V. PROJECT ALTERNATIVES
A. INTRODUCTION

A. INTRODUCTION

Pursuant to CEQA Guidelines Section 15126.6(a), an EIR is required to 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 discussion of alternatives need not be exhaustive, but rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR must also evaluate a "no project" alternative. An EIR is not required to consider alternatives that are infeasible.

1. Analytical Assumptions and Methodology

The level of detail required in the alternatives analysis does not need to be as detailed as required for the environmental analysis of the Proposed Project. Rather, an EIR should include "sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project." As such, the alternatives analysis is presented as a comparative qualitative and quantitative analysis to the Proposed Project, and assumes that all applicable mitigation measures proposed for the Proposed Project would apply to each alternative. Impacts associated with each alternative are evaluated in comparison to the Proposed Project's impacts and are classified as increased, reduced, or essentially equivalent to the level of impact associated with the Proposed Project.

B. ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines Section 15126.6(b) states that "the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." Thus, the consideration of feasible alternatives was focused on lessening or avoiding the Project's significant and unavoidable impacts associated with construction noise and vibration, and historic resources.

In accordance with CEQA Guidelines Section 15126.6(c), An analysis of an alternative project site was rejected from further consideration because of the Applicant's ownership of the property and intended plan to redevelop and existing property. "The key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR" [CEQA Guidelines Section 15126.6(f)(2)(A)]. Further analysis of an alternative project site was rejected from consideration because a primary objective of the Proposed Project is to redevelop an existing site that is currently developed with commercial office and medical office uses. The existing office buildings need a substantial investment with respect to building repairs and upgrades in order to stay economically viable. As such, the Applicant is seeking

ways to make an underutilized site viable with a new land use development plan that is consistent with the Applicant's stated Project Objectives. The continuation of the existing uses is not consistent with the Project Objectives for developing a mixed-use residential project. Furthermore, from an environmental perspective, the Project is consistent with responsible planning policies adopted by SCAG's 2016-2040 RTP/SCS and SB 375 which encourages high-density housing on infill lots in close proximity to transit and employment centers. The Project Site is located in a jobs-rich area of the City of Los Angeles and is in a designated High Priority Transit area. Thus, the location of the Project is advantageous with respect to minimizing vehicle miles travelled throughout the region, which would in turn result in reduced traffic congestion and reduced air quality emissions. The re-use of an existing developed site would also encourage revitalization of an older neighborhood with contemporary land uses that are consistent with the Community Plan's policies. For these reasons, an evaluation of developing the Proposed Project at an alternative location was rejected from further analysis.

C. SELECTION OF ALTERNATIVES

The objective of the project alternatives analysis, as directed by CEQA, is to identify alternatives that could 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. Based on this directive, the Project Alternatives evaluated within the scope of this EIR are as follows:

1) No Project Alternative
2) Adaptive Reuse Alternative – (Residential/Retail on the South Block and Residential on the North Block)
3) Commercial Reuse Alternative – (Retail/Office on the South Block and Residential on the North Block), and
4) Reduced Density Alternative.

A detailed description and environmental analysis for each of these alternatives is provided within Sections V.B through V.E below. The identification of the alternative that would be most capable of reducing the Proposed Project's adverse environmental impacts is presented in Section V.F, Environmentally Superior Alternative. While the No Project Alternative was selected as the environmentally superior alternative, CEQA requires an alternative other than the No Project Alternative to be selected. Based on the environmental analysis presented in this Section, and as further summarized in Section V.F, Environmentally Superior Alternative, the Adaptive Reuse Alternative was selected as the environmentally superior alternative as it would be more effective in reducing or eliminating the projects significant cultural impact as compared to the range of alternatives evaluated in this EIR.

V. PROJECT ALTERNATIVES
B. NO PROJECT ALTERNATIVE

A. DESCRIPTION OF THE ALTERNATIVE

The No Project Alternative is the circumstance under which the Proposed Project does not proceed. CEQA Guidelines (Section 15126.6(e)) provides that the "no project" analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what can reasonably be expected to occur in the foreseeable future if the project is not approved based on current plans and consistent with available infrastructure and community services. In March 2016, at the time the NOP was published for the Proposed Project, the Project Site was developed with approximately 111,272 gross square feet of building area, of which 97,242 square feet consisted of leasable floor area, with 27,204 square feet of general office, 58,112 square feet of medical office, 996 square feet of high turn over restaurant space, and 10,930 square feet of vacant office space. The North Block consists of a three-level parking structure that provides parking for the two commercial buildings on the South Block.

Under the No Project Alternative, no buildings would be demolished and no new buildings would be constructed. The parking structure on the North Block would remain as is with no changes. It is reasonable to assume that there would continue to be fluctuation in the active leasable area on the South Block. Building repair and upgrades would be necessary for the commercial uses to remain occupied and viable. While it may be possible for commercial vacancies to fluctuate over time, the No Project Alternative assumes that the leasable area of the two commercial office and medical office buildings on the South Block would remain similar to current conditions. Currently, the commercial office and medical office buildings are operating with a vacancy rate of approximately 11 percent. In the second quarter of 2016, the average vacancy rate for the downtown Los Angeles office space market was approximately 14 percent.[1] Thus, the assumption that the existing vacancy rate of approximately 11 percent would remain consistent in the immediate future is reasonable and supported by current market data. As such, the Project Site's active land uses would include approximately 97,242 square feet of leasable commercial space, as summarized in Table V.B-1, No Project Alternative Land Uses, below.

Table V.B-1
No Project Alternative Land Uses

Land Use	Leasable Floor Area (sf)[a]
General Office	38,134 [a]
Medical/Dental Office	58,112
High-Turnover Restaurant	996
Parking Garage	NA
TOTAL	**97,242**

Note: General office includes 27,204 square feet of leased general office space and 10,930 square feet of vacant office space.

[1] *CBRE, 2016, Los Angeles Market View Q2 2016.*

B. ENVIRONMENTAL ANALYSIS

1. Aesthetics

The No Project Alternative would not involve any new construction or demolition associated with the Proposed Project. No improvements or physical modifications would occur and the Project Site would remain in its present form. Therefore, views of the Proposed Project would remain unchanged (refer to Figures IV.A-1 through IV.A-3 located in Section IV.A, Aesthetics, for existing views of the Project Site). Additionally, the No Project Alternative would retain the existing sources of lighting and glare on the Project Site and in the surrounding area. Since the No Project Alternative includes no physical alterations to the current site, the No Project Alternative would have no impact when compared to the Proposed Project.

The Related Projects identified in Section II, Project Description, would proceed independently of the Project and would alter the aesthetic quality of the neighborhood. Specifically, the Bixel and Lucas Project, which fronts the south side of W. 6th Street (across from the Project Site), would alter views along W. 6th Street, Bixel Street, and Lucas Avenue.

2. Air Quality

a. Construction

The No Project Alternative would not create any construction emissions, as demolition and construction activities would not occur. The No Project Alternative would have no impact when compared to the Proposed Project with respect to air quality during the construction phase.

b. Operation

Operational air pollutant emissions are generated at the Project Site by existing commercial office and retail land uses. Stationary sources, such as space and water heating, architectural coatings (paint), consumer products and mobile vehicle traffic traveling to and from the Project Site contribute to the Project Site's existing emissions. It is reasonable to assume that the active leasable area on the South Block would be similar to existing conditions. The similar utilization of the Project Site as compared to existing conditions would create similar air pollution emissions from stationary sources and mobile sources. The No Project Alternative would not violate any air quality standards. Compared to existing conditions, the No Project Alternative would result in no increased air quality impacts. The No Project Alternative would have reduced air quality impacts when compared to the Proposed Project.

3. Cultural Resources

a. Historic Resources

The two commercial office and medical office buildings on-site, located at 1111 W. 6th Street and 1125 W. 6th Street, were determined to be historical resources. Under the No Project Alternative, no new construction or physical modification associated with the Proposed Project would occur on the Project Site. As such, the two historic buildings would continue to operate similar to existing conditions and maintain their eligibility for historic listing. Continued occupancy and use of the existing buildings would necessitate renovations and updates to the buildings and on-site infrastructure. It is reasonable to assume that under the No Project Alternative any potential future upgrades or renovations would conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. Therefore, the No Project Alternative would have a less than significant impact upon cultural resources. As compared to the Proposed Project, which would result in a significant unavoidable adverse impact associated with the demolition of both historic resources, impacts would be reduced to less than significant levels under the No Project Alternative.

b. Archaeological Resources

The Proposed Project would result in a less than significant impact upon archaeological resources, as the Project Site has been subject to past ground disturbing activities and, based on cultural resources records search conducted by the South Central Coastal Information Center (SCCIC), no known archaeological resources have been recorded within the Project Site. The No Project Alternative would not involve any earthwork or ground disturbing activities. As such, there would be no potential for any adverse impacts to occur to archaeological resources.

c. Paleontological Resources

The Proposed Project would result in a less than significant impact upon paleontological resources, as the Project Site has been subject to past ground disturbing activities and, based on a records search by the Natural History Museum of Los Angeles County - Vertebrate Paleontology Department, no known Paleontological resources have been recorded within the Project Site. The No Project Alternative would not involve any earthwork or ground disturbing activities. As such, there would be no potential for any adverse impacts to occur to paleontological resources.

4. Geology and Soils

Under the No Project Alternative, the Project Site remains in its current condition and retains its current on-site operations. The No Project Alternative does not include the construction of any new structures or buildings. As such, the No Project Alternative would not result in any new sources or increased risk of loss, injury, or death involving strong seismic ground shaking, liquefaction, landslides, or ground failure on-site. The No Project Alternative would have no impact to geology and soils. When compared to the Proposed Project, the No Project Alternative would have a reduced impact upon potential geotechnical hazards.

5. Greenhouse Gas Emissions

a. Construction

Construction of the Proposed Project would generate approximately 1,446 CO_2eMT, with an annual maximum of 927 CO_2eMT occurring in 2017. The No Project Alternative would not create any construction related greenhouse gas emissions, since demolition and Project construction would not occur. Hence, the No Project Alternative would have reduced construction GHG emissions when compared to the Proposed Project.

b. Operation

GHG emissions are currently generated at the Project Site by stationary sources, such as space and water heating, electricity use, water use, solid waste generation, and mobile vehicle traffic traveling to and from the Project Site. It is reasonable to assume that there would be fluctuation in the active leasable area on the South Block but that utilization of the Project Site would remain similar to existing conditions. Greenhouse gas emissions from stationary sources and mobile sources would be similar to existing operations on-site. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. Under the current conditions, the Project Site generates approximately 3,386.45 CO_2eMT per year. These emissions would persist under the No Project Alternative and would be less than the 5,887.32 CO_2eMT per year estimated to occur under the Proposed Project. Therefore, GHG emissions under the No Project Alternative would be less than significant and reduced as compared to the Proposed Project.

6. Hazardous Materials and Risk of Upset

The Project Site is identified on the following databases: HAZNET, CHMIRS, EDR Historic Auto Station and EDR Historic Cleaners. The Good Samaritan Hospital, located to the southwest of the Project Site was identified as a Leaking Underground Storage Tank (LUST) and EDR Historic Auto Station site, and the adjacent property to the southeast was identified as a UST, CA FID UST, HIST UST, and SWEEPS UST site in the regulatory database report. Although environmental issues were identified regarding the historical uses of the Project Site, which included dry cleaning facilities and automotive repair operations that may have impacted the soil and groundwater with petroleum hydrocarbons and VOCs, no current or historical recognized environmental conditions were identified on-site. Subsurface petroleum hydrocarbons and fuel-related VOC contaminants at the Project Site have been identified in two distinctly different distributions in the subsurface of the Project Site and are likely resultant of two (or potentially more) different sources.

The No Project Alternative does not include any construction or alterations to the Project Site and does not include any additional or new sources of hazardous materials that have not been previously in use. Therefore, the No Project Alternative will not produce any new hazardous emissions or handle hazardous materials. As such, no impact would occur. When compared to the Proposed Project, the No Project Alternative would have a reduced impact upon hazards and risk of upset.

7. Land Use and Planning

Under the No Project Alternative, the Project Site would experience no changes in land uses or changes to the condition of the Project Site. The Project Site includes three land use categories that guide development on-site defined by the Specific Plan. Since the No Project Alternative would result in no changes to the current land use and zoning designations or to the physical condition of the Project Site, the No Project Alternative would have no impact to land use and planning and no discretionary permits would be required. Compared to the Proposed Project, the No Project Alternative would result in a reduced impact with regards to land use and planning.

8. Noise

a. Construction

The No Project Alternative would involve no new construction. As such, no construction noise or vibration is anticipated to occur under this alternative. In the event any future upgrades or building renovation occurs, such activities would likely generate a temporary increase in noise levels during the permissible hours of construction. Noise related to interior renovations would be attenuated by the existing walls and windows of the structures and thus would not substantially increase noise levels within the broader Project area. Further, because the Project Site is already developed no earthwork or grading activities would occur under this alternative. Thus, there would be no potential for building renovations to generate groundborne vibration impacts. Under the No Project Alternative, impacts with respect to construction noise or vibration would be reduced as compared to the Proposed Project.

b. Operation

The No Project Alternative would not introduce any new activities to the Project Site with the potential to create operational noise impacts or sensitive receptors with the potential to be impacted by noise impacts. Operation noise on-site would be typical of commercial office and medical office noise, consistent with existing uses on-site. Under the No Project Alternative, no increased impact would occur with respect to operational noise. Impacts with respect to operational noise would be reduced when compared to the Proposed Project's less than significant impact.

9. Population, Housing, and Employment

The No Project Alternative would result in the continued operation of two commercial office and medical office buildings and a 996 square foot restaurant. No residential uses exist on-site. Under the No Project Alternative, no impact would occur with respect to population, housing, and employment. Impacts with respect to population, housing, and employment would be reduced when compared to the Proposed Project's less than significant impact.

10. Public Services

The No Project Alternative does not include the construction of any new structures or buildings on-site. The similar occupancy of the existing on-site buildings would not substantially increase the demand on local fire protection services, police protection services, schools, and parks compared to existing operations. Under the No Project Alternative, a less than significant impact would occur with respect to public services. When compared to the Proposed Project, the No Project Alternative would have a reduced impact.

11. Traffic / Transportation

The No Project Alternative would result in the continued operation of two commercial office and medical office buildings and a 996 square foot restaurant and there would be no change in the amount of traffic generated as compared to existing conditions. The No Project Alternative would not create any new traffic impacts or changes to traffic patterns in the Project area. When compared to the Proposed Project, the No Project Alternative would have a reduced impact.

12. Utilities and Service Systems

a. Water

The No Project Alternative would result in the continued operation of two commercial office and medical office buildings and a 996 square foot restaurant. The existing baseline water demand is approximately 23,915 gpd, which accounts for the occupied commercial offices and medical offices on-site. The existing building is operating at an approximate 11 percent vacancy rate, which is expected to remain constant in the foreseeable future. The continuation of the existing on-site operations under the No Project Alternative would not generate any additional demands for water facilities. Therefore, the No Project Alternative would have a less than significant impact. When compared to the Proposed Project, the No Project Alternative would have a reduced demand for water and thus a reduced environmental impact upon water resources.

b. Wastewater

Under the No Project Alternative, the existing baseline wastewater generation is approximately 19,929 gpd, which accounts for the occupied commercial offices and medical offices on-site. The existing building is operating at an approximate 11 percent vacancy rate, which is expected to remain constant in the foreseeable future. The Hyperion Water Reclamation Plant would continue to treat the wastewater from the Project Site under the No Project Alternative. Therefore, the No Project Alternative would have no impact upon wastewater. As compared to the Proposed Project, the No Project Alternative would have a reduced environmental impact upon wastewater treatment systems.

c. Energy Conservation

Under the No Project Alternative, the Project Site currently generates approximately 1,410,892 kWh/year in electricity demands and 173,520 cf/month in natural gas demands, since 10,930 square feet of the Project Site is vacant. The continuation of the existing on-site operations under the No Project Alternative would not generate a substantial increase in electricity or natural gas demands. The No Project Alternative would also not incorporate EV parking, Title 24 standards, the Los Angeles Green Building Code standards, or other energy efficient features, which the Proposed Project would incorporate. Therefore, the No Project Alternative would have no impact. When compared to the Proposed Project, the No Project Alternative would have a reduced impact.

d. Solid Waste

Under the No Project Alternative, the existing baseline solid waste generation is approximately 675 lbs/day, which accounts for the occupied commercial office and medical offices on-site. Currently, approximately 10,930 square feet of office space is unoccupied. The Sunshine Canyon Landfill and the Chiquita Canyon Landfill have sufficient capacity and would continue accepting solid waste from the Project Site. Therefore, the No Project Alternative would have no impact. When compared to the Proposed Project, the No Project Alternative would have a reduced environmental impact upon solid waste facilities.

V. PROJECT ALTERNATIVES
C. ADAPTIVE REUSE ALTERNATIVE (RESIDENTIAL/RETAIL ON THE SOUTH BLOCK AND RESIDENTIAL ON THE NORTH BLOCK)

A. DESCRIPTION OF THE ALTERNATIVE

The Adaptive Reuse Alternative consists of a new residential development project with the preservation and adaptive re-use of the existing buildings on the South Block, converting the existing commercial uses to residential dwelling units in Building A and Building B with ground floor retail space in Building B on the South Block, and the redevelopment of the North Block with a mid-rise multi-family residential building. Under this Alternative, a total of 223 residential units would be provided with 9,810 square feet of commercial retail floor area and 227 structured parking spaces. 142 multi-family dwelling units would be provided on the North Block. The South Block would contain 81 multi-family dwelling units with 57 dwelling units in Building A and 24 dwelling units and 9,810 square feet of retail space in Building B. A summary of the development program under this alternative is provided in Table V.C-1, Adaptive Reuse Alternative Project, below.

Table V.C-1
Adaptive Reuse Alternative Project

Land Uses	Dwelling Units	Floor Area (Square Feet)[a]
Proposed Project:		
North Block		
Studio Units	104	*132,550 sf*
1-Bedroom Units	18	
2-Bedroom Units	20	
3-Bedroom Units	0	
North Building Residential Subtotal	*142 du*	
South Block		
Building A		
Studio Units	24	*72,531 sf*
1-Bedroom Units	10	
2-Bedroom Units	18	
3-Bedroom Units	5	
Subtotal Building A	*57 du*	
Building B		
Residential		
Studio Units	12	*43,264 sf*
1-Bedroom Units	6	
2-Bedroom Units	6	
Subtotal Building B	*24 du*	
Ground Floor Retail	9,810 sf	
TOTAL	**223 du**	**248,345 sf**

[a] *Includes common circulation and amenity areas.*
Source: Steinberg Architects, August 2016.

1. North Block

The North Block is currently developed with a 3-level surface parking structure. This parking currently supports the existing commercial office and medical office building uses on the South Block. This Alternative would result in the demolition of the existing parking structure and the construction of a new mid-rise multi-family residential building with 142 dwelling units and 227 parking spaces. Parking would be provided in four levels of parking (two below grade and two above grade) to meet the residential parking demand for both the North Block and South Block, as well as the retail uses on the South Block. The development on the North Block would be similar to the Proposed Project, with 142 multi-family residential dwelling units and 132,550 square feet of residential floor area. However, this alternative would result in smaller unit sizes as the first and second levels would be occupied by vehicle parking area. Under this alternative the North Block would include 104 studio units, 18 one-bedroom units, and 20 two-bedroom units.

The building height, scale, and massing of the North Building under this alternative would be the same as the Proposed Project. Architectural features for the North Block would include a mix of materials and architectural elements, which may include but is not limited to: aluminum windows, pre-finished metal panels, painted metal railing, glass railing, vinyl window, exterior plaster, and composite siding. Building elevations depicting the scale and massing of the proposed structure are shown in Figure II-24, North Building – North and South Elevation. The typical floor plan layout would be the same as proposed under the Proposed Project.

2. South Block

a. Building A

The existing 5-story building located at 1115-1135 W. 6th Street (Building A) is currently developed with approximately 69,160 square feet of gross floor area and is improved with commercial office and medical office land uses. This alternative would include an adaptive re-use of Building A with 57 residential units consisting of 24 studio units, 10 one-bedroom units, and 18 two-bedroom units, and five townhomes. An approximate 5,441 square foot fitness amenity area would be provided on the ground floor. The ground floor would also include a residential lobby/lounge area and set aside area for bicycle storage. The basement level would be converted to storage areas and would include a basement level for the five townhome units.

b. Building B

The existing 4-story building located at 1101-1113 W. 6th Street and 517 and 521 S. Bixel Street (Building B) is currently developed with approximately 42,112 square feet of gross floor area and is improved with commercial office and medical office uses. This alternative would include an adaptive re-use of Building B with 24 residential units consisting of 12 studio units, six one-bedroom units, and six two-bedroom units. Building B would also include approximately 9,810 square feet of commercial retail uses. For analytical purposes, it is assumed that the retail area may be developed with up to 6,410 square feet of general retail space, 2,200 square feet of restaurant space, and a 1,200 square foot coffee shop.[2]

[2] *The area allocated to restaurant and coffee shop is the same as proposed under the Proposed Project.*

An illustrative site plan and cross section rendering of this alternative is provided in Figure V.C-1, Adaptive Reuse Alternative Site Plan and Cross Section.

3. Parking

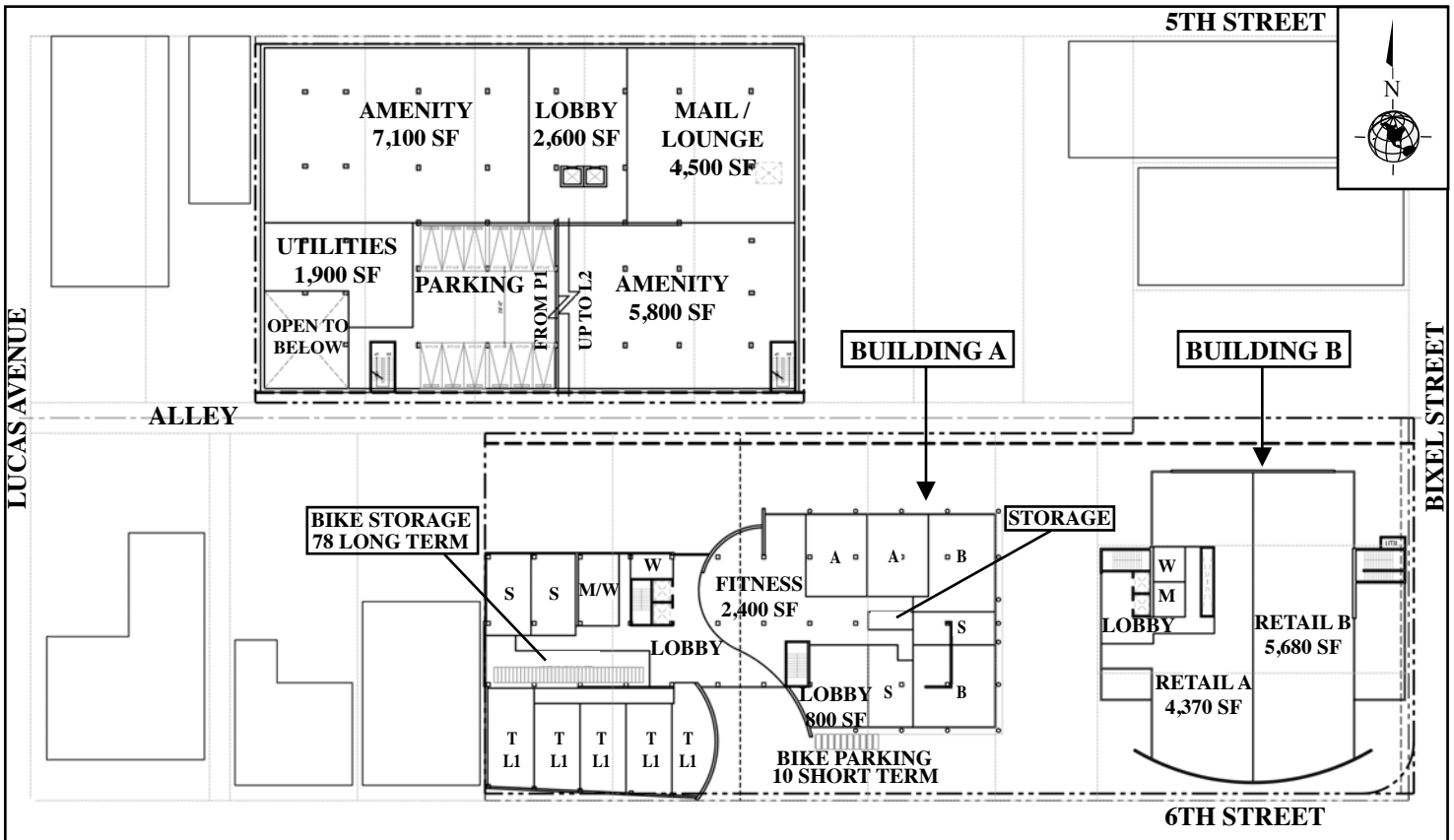
Parking for the alternative would be provided within the new residential building on the North Block. Buildings A and B on the South Block do not have any existing space allocated for parking areas and have existing covenants that require the parking demands to be accommodated in the neighboring North Block. Thus, all parking would be provided in the structured parking garage on the North Block. Under this alternative, two levels of underground parking and two levels of above grade parking would be provided. Vehicular access to the North Building would be provided via one ingress/egress driveway on the alleyway. On-site parking would serve the residential parking demands for the North Building and Buildings A and B on the South Block and the retail parking demand for Building B. Similar to the Proposed Project, the alley would be converted to a one-way westbound operation.

As summarized in Table V.C-2, below, this Alternative would require and provide a total of 227 parking spaces with 132 residential spaces for the North Block, 79 residential spaces for Buildings A and B on the South Block, and 16 retail spaces for Building B on the South Block. Similar to the Proposed Project, this Alternative would seek a 10 percent reduction in the number of residential stalls required, and a 20 percent reduction in the number of commercial stalls required pursuant to LAMC 12.21.A.4.

Table V.C-2
Summary of Required and Proposed Parking Spaces
For the Adaptive Reuse Alternative

Description	Quantity	Parking Required by Code [a]		Parking Provided
		Rate	Spaces	
North Block				
Residential				
Less than three habitable rooms	104	1.00 stall/du	104	***132***
Three habitable rooms	18	1.00 stall/du	18	
More than three habitable rooms	20	1.25 stall/du	25	
		10% Reduction [b]	*-15*	
		Subtotal Residential	***132***	
South Block				
Residential				
Less than three habitable rooms	36	1.00 stall/du	36	***79***
Three habitable rooms	16	1.00 stall/du	16	
More than three habitable rooms	29	1.25 stall/du	36	
		10% Reduction [b]	*-9*	
		Subtotal Residential	***79***	
Commercial				
Retail	9,810 sf	2 stalls / 1,000 sf	20	***16***
		20% Reduction [b]	*-4*	
		Subtotal Retail	***16***	
		TOTAL	**227**	**227**

Notes:
du = dwelling unit, sf = square feet
[a] *LAMC 12.21.A.4(p)*
[b] *Bicycle Parking Ordinance (No. 182,386), March 13, 2013.*
Source: Steinberg Architects, August 2016.



LEGEND

RESIDENTIAL UNITS:

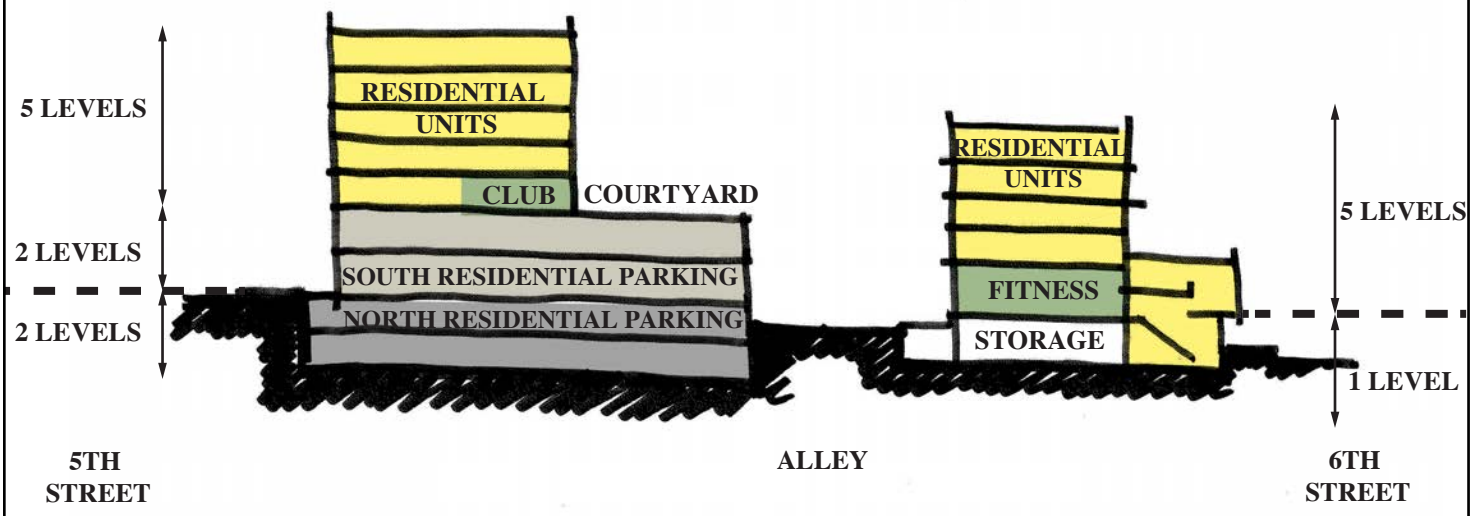
A - 1-BEDROOM UNIT

B - 2-BEDROOM UNIT

T - TOWNHOME UNIT

S - STUDIO UNIT

Conceptual Ground Floor Plot Plan



Conceptual Building Cross Section

Source: Steinberg, August 10, 2016.

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Figure V.C-1
Adaptive Reuse Alternative (Residential / Retail)
Conceptual Site Plan and Cross Section

4. Open Space and Landscaping

Under the Adaptive Reuse Alternative, an open space courtyard would be provided on the 3rd level podium deck above the parking structure on the North Block. Amenities proposed within the common open space areas within the North Building include a swimming pool, a spa, landscaped courtyards, cabana, outdoor seating, a fitness center, barbeque areas, and outdoor relaxing areas. Similar to the Proposed Project, this alternative's landscape palate would feature ornamental plants and drought-tolerant species.

The open space requirements and amount of open space proposed for the Adaptive Reuse Alternative are summarized in Table V.C-3, Summary of Required and Proposed Open Space Areas Adaptive Reuse Alternative, below. As shown in Table V.C-3, the Adaptive Reuse Alternative would provide 15,060 square feet of common open space and 5,310 square feet would be private open space.

Similar to the Proposed Project, the three existing street trees along 5th Street would be removed and replaced in consultation with the City of Los Angeles Division of Urban Forestry and approved by the Department of Public Works. Due to the lack of existing available open space in the South Block and the

Table V.C-3
Summary of Required and Proposed Open Space Areas for the Adaptive Reuse Alternative

LAMC Open Space Requirements [a]	Dwelling Units		Open Space Required (square feet)	
	North Block	South Block	North Block	South Block [c]
Less than three habitable rooms (100 sf/du)	122	52	12,200	0
Three habitable rooms (125 sf/du)	20	24	2,500	0
More than three habitable rooms (175 sf/du)	0	5	0	0
Subtotal	**142**	**81**	**14,700**	**0**
Proposed Open Space			**Open Space Proposed (square feet)**	
Common Open Space	--	--	15,060	
Private Open Space [b]	--	--	5,310	

Notes:
[a] *LAMC 12.21.G and Central City West Specific Plan*
[b] *Per the Central City West Specific Plan, 50 sf/unit may be counted towards required open space if 150 sf/unit is provided on at least 50% of units.*
[c] *LAMC 12.21.G.2, Open Space is required for new construction only.*
Source: Steinberg Architects, August 2016 and Parker Environmental Consultants.

existing configuration of the existing building, this Alternative would need an exception to deviate from the requirements of CCWSP Appendix D-C.2 in order to provide less than 38 trees within the South Block.

5. Entitlement Requests

Discretionary entitlements, reviews, and approvals required for implementation of the Adaptive Reuse Alternative would include, but may not be limited to:

1. Pursuant to Los Angeles Municipal Code ("LAMC") Section 11.5.7-C, a Project Permit Compliance Approval of the Central City West Specific Plan ("CCWSP").
2. Pursuant to LAMC Section 11.5.7-F, the Applicant requests the following Specific Plan Exceptions of the Central City West Specific Plan:
    a. To allow a (0) zero-foot front yard setback for the North Building, in lieu of the 15 ft.; as required by the CCWSP, Section 6.F-2,
    b. To allow (0) zero-foot side yard setbacks for the east and west property lines for the North Building, in lieu of the 10 ft. required by the CCWSP, Section 6.F-2,
    c. To allow a (0) zero-foot rear yard setback for the seven-story North Building, in lieu of the 19 ft. (15 ft.+ 1 ft. above the 3rd floor) required by the CCWSP, Section 6.F-2,
    d. To deviate from the street standards of 5th Street, as required by the CCWSP Appendix C.1.K to be consistent with the newly adopted Mobility Plan.
    e. To deviate from the requirements of CCWSP Appendix D-C.2 in order to provide less than 38 trees within the South Block.
3. Pursuant to LAMC Section 12.27, the Applicant requests a Variance to allow commercial parking to be located within the R5 Zone to accommodate the commercial parking requirements for the South Building.
4. Pursuant to LAMC Section 12.24.X.1 the Applicant would request permission to convert the existing office buildings located in the South Block using the Adaptive Reuse Ordinance. The Applicant would request permission to construct a total of 81 residential dwelling units with 57 residential dwelling units to be located within Building A and 24 residential dwelling units to be located within Building B. As permitted by LAMC Section 12.24.X.1(b)(2), the Applicant would also request permission to modify the following development standard:
    a. LAMC Section 12.21.A.4(a) which requires a residential parking space to be located on the same lot as the unit. The Applicant would request permission to allow Code required parking for the adaptive reuse Buildings to be provided in the adjacent parking structure within the new building.

Pursuant to various sections of the LAMC, the Applicant will request approvals and permits from the Department of Building and Safety (and other municipal agencies) for construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route, removal of existing street trees, and building and tenant improvements. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the alternative project.

B. ENVIRONMENTAL ANALYSIS

1. Aesthetics

The Project Site is located in a Transit Priority Area. Similar to the Proposed Project, Adaptive Reuse Alternative's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

The Adaptive Reuse Alternative would involve the demolition of the parking structure and the construction of 142 residences on the North Block and the rehabilitation and adaptive reuse of the two commercial office and medical office buildings into residential buildings on the South Block. The Adaptive Reuse Alternative would revitalize the two buildings on the South Block and would generally maintain the existing views of the South Block along W. 6th Street and Bixel Street (refer to Figures IV.A-1 through IV.A-3). Similar to the Proposed Project, the Adaptive Reuse Alternative would enhance views of the Project Site fronting the North Block along W. 5th Street with the demolition of the parking structure and the construction of a residential building with 142 multi-family units that would be visually consistent with the residential buildings that front the north side of W. 5th Street. Since development of the Adaptive Reuse Alternative would be limited to the North Block, this alternative would have minimal impacts on views of downtown Los Angeles along W. 5th Street and W. 6th Street. Further, the Adaptive Reuse Alternative would implement code compliance measures to ensure the upkeep and aesthetic quality of the Project Site. As required by the CCWSP's Urban Design Guidelines, all open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with the LAMC. Additionally, every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104. With regards to views, the Adaptive Reuse Alternative would result in a less than significant impact. Since the Adaptive Reuse Alternative would maintain the two existing buildings on the South Block and would visually improve the North Block by removing the parking structure, the Adaptive Reuse Alternative would have a reduced impact when compared to the Proposed Project.

The Adaptive Reuse Alternative would generally retain the existing sources of lighting and glare on the South Block, but has the possibility of increasing nighttime lighting and daytime glare sources along W. 6th Street and Bixel Street. The Adaptive Reuse Alternative would increase nighttime lighting and daytime glare sources along W. 5th Street. The conversion of the Project Site to residential uses would increase daytime and especially nighttime activity on the Project Site. Nighttime lighting would be generated through light radiating from windows of the residences, security and pedestrian lighting fixtures, and headlights from vehicles entering and exiting the Project Site. Glare may be generated in the Project area by Project residents and guests parking their vehicles on surrounding streets. While the residential building on the North Block would be constructed with materials designed to reduce glare to the greatest extent feasible, it is still likely that the façade materials and windows would generate some degree of glare. The two buildings on the South Block would generally continue generating the same

amount of glare. Similar to the Proposed Project, the Adaptive Reuse Alternative shall comply with Section 99.05.106.8, Light Pollution Reduction, of the City of Los Angeles Green Building Code (Ord. 182849) to ensure that lighting impacts would be reduced. With regards to nighttime lighting and daytime glare, the Adaptive Reuse Alternative would result in a less than significant impact. Since the Adaptive Reuse Alternative would maintain the two existing buildings on the South Block and only redevelop the North Block, the Adaptive Reuse Alternative would have a reduced impact when compared to the Proposed Project.

The Related Projects identified in Section II, Project Description, would proceed independently of the Project and would alter the aesthetic quality of the neighborhood. Specifically, the Bixel and Lucas Project, which fronts the south side of W. 6th Street (across from the Project Site), would alter views along W. 6th Street.

2. Air Quality

a. Construction

A significant impact would occur if a project would considerably increase the release of criteria pollutants for which the project region is in non-attainment; if a project would conflict with applicable air quality plans or violate any air quality standards; or if a project were to create objectionable odors affecting a substantial number of people. The Adaptive Reuse Alternative would generate less construction emissions compared to the Proposed Project, since the Adaptive Reuse Alternative only includes the demolition and construction of the North Block. The construction-related air quality emissions on the South Block would be greatly reduced, as no demolition or grading activities would occur and building construction emissions would be limited to renovation activities. The duration of the construction period under this alternative is expected to be reduced as there would be a reduction in the total grading and new building construction. Similar to the Proposed Project, the Adaptive Reuse Alternative would be required to comply with applicable SCAQMD rules and regulations for new or modified sources, such as SCAQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings), which are further discussed in Section IV.B, Air Quality. The Adaptive Reuse Alternative would result in a less than significant impact. Since the Adaptive Reuse Alternative would maintain the two existing buildings on the South Block and only redevelop the North Block, the Adaptive Reuse Alternative would have a reduced impact when compared to the Proposed Project.

b. Operation

Operational air pollutant emissions would be generated at the Project Site by stationary sources, such as space and water heating, architectural coatings (paint), consumer products and mobile vehicle traffic traveling to and from the Project Site. The increase in tenants and guests on-site would increase air pollution emissions from stationary sources and mobile sources and contribute to increased emissions compared to the existing operations on-site, which include partially vacant commercial uses.

The Proposed Project would include a total of 369 dwelling units, which includes 142 dwelling units on the North Block and 227 dwelling units on the South Block, and 22,000 square feet of ground floor

commercial uses on the South Block. The Adaptive Reuse Alternative includes a total of 223 dwelling units, which includes 142 dwelling units on the North Block and 81 dwelling units on the South Block, and 9,810 square feet of ground floor commercial uses on the South Block. As such, the Adaptive Reuse Alternative would be smaller than the Proposed Project by approximately 146 dwelling units and 12,190 square feet of commercial space.

The Adaptive Reuse Alternative would not violate any air quality standards and would be required to comply with applicable SCAQMD rules and regulations for new or modified sources, such as SCAQMD Rule 1138 (Odor-Reducing Equipment) . The Adaptive Reuse Alternative would result in a less than significant impact. Compared to the Proposed Project, the Adaptive Reuse Alternative would have reduced air quality impacts.

3. Cultural Resources

a. Historic Resources

The two commercial office and medical office buildings on-site, located at 1111 W. 6th Street and 1125 W. 6th Street, were determined to be historic resources. Under the Adaptive Reuse Alternative, both buildings on the South Block would be maintained and revitalized as residential buildings. As such, the two historic buildings would visually maintain their current existing conditions and maintain their eligibility for historic listing. Continued occupancy and use of the existing buildings would necessitate renovations and updates to the buildings and on-site infrastructure. It is reasonable to assume that under the Adaptive Reuse Alternative any potential future upgrades or renovations would conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. Therefore, the Adaptive Reuse Alternative would have a less than significant impact upon historic resources, and impacts upon historic resources would be reduced as compared to the Proposed Project.

b. Archaeological Resources

The Proposed Project would result in a less than significant impact upon archaeological resources. The Project Site has been subject to past ground disturbing activities and, based on an SCCIC cultural resources records search, no known archaeological resources have been recorded within the Project Site. Potential impacts associated with the unlikely discovery of unknown resource materials would be avoided or reduced to less than significant levels through implementation of existing regulatory code-compliance measures. The Adaptive Reuse Alternative would not involve any earthwork or ground disturbing activities on the South Block. As such, there would be no potential for any adverse impacts to occur to archaeological resources within the South Block, and the potential for any unknown resources to be disturbed would be reduced as compared to the Proposed Project. Similar to the Proposed Project, the potential for significant archaeological impacts to occur during grading and earthwork activity on the North Block would be reduced to less than significant levels with adherence to the California Public Resources Code Section 21083.2 for the proper handling of such resources and with State Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98 for the proper

handling of human remains. Thus, impacts to archaeological resources under this alternative would be similarly less than significant but slightly reduced as compared to the Proposed Project.

c. Paleontological Resources

The Proposed Project would result in a less than significant impact upon paleontological resources, as the Project Site has been subject to past ground disturbing activities and, based on a records search by the Natural History Museum of Los Angeles County - Vertebrate Paleontology Department, no known Paleontological resources have been recorded within the Project Site. Potential impacts associated with the unlikely discovery of unknown resource materials would be avoided or reduced to less than significant levels through implementation of existing regulatory code-compliance measures. The Adaptive Reuse Alternative would not involve any earthwork or ground disturbing activities on the South Block. As such, there would be no potential for any adverse impacts to occur to paleontological resources within the South Block. Similar to the Proposed Project, the potential for significant paleontological impacts to occur during grading and earthwork activity on the North Block would be reduced to less than significant levels with adherence to regulatory code compliance measures. Thus, impacts to paleontological resources under the Adaptive Reuse Alternative would be similarly less than significant but slightly reduced as compared to the Proposed Project.

4. Geology and Soils

A significant impact may occur if a project would place a new structure or building in an area that is susceptible to geological hazards or unstable soils. As discussed in the Geotechnical Investigation for the Project Site, seismic hazards relating to surface rupture, liquefaction, lateral spreading, landsliding, subsidence, and collapse are considered low-risk issues on the Project Site. The primary seismic hazard for the Project Site is the potential for strong ground motion. The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The Project Site is located in a seismically active region, as is all of Southern California. These geologic hazards are common and ubiquitous throughout Southern California. The Adaptive Reuse Alternative would be designed and constructed in conformance with the most recently adopted California Building Code and Los Angeles Building Code design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. Further, similar to the Proposed Project, the design and construction of the Adaptive Reuse Alternative would be subject to the review and approval of the Department of Building and Safety. However, seismic retrofit of the adaptive reuse structures would be subject to the 2013 California State Historical Building Code (SHBC). The Adaptive Reuse Alternative would be required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter and Project's Geotechnical Report and the requirements outlined in the latest edition of the City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, as discussed in Section IV.D, Geology and Soils. The Adaptive Reuse Alternative would have a less than significant impact with respect to seismic hazards. When compared to the Proposed Project, the Adaptive Reuse Alternative would have similar impacts upon potential seismic hazards.

The Adaptive Reuse Alternative construction impacts on soil erosion, sedimentation, and groundwater dewatering would be less than significant with compliance to the requirements outlined in the Chapter IX, Division 70 of the City's Uniform Building Code; the LID Ordinance 181,809; and the Standard Urban Stormwater Mitigation Plan (SUSMP), as stated in Section IV.D, Geology and Soils. The Adaptive Reuse Alternative would be required to implement the soil erosion control measures and LID Ordinance to control soil erosion and sedimentation. Further, any dewatering activities would comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. The Adaptive Reuse Alternative would have a less than significant impact with respect to soil erosion, sedimentation, and groundwater dewatering. When compared to the Proposed Project, the Adaptive Reuse Alternative would have reduced impacts upon erosion and dewatering because of the smaller development area on-site.

5. Greenhouse Gas Emissions

a. Construction

The Adaptive Reuse Alternative would generate fewer greenhouse gas emissions during construction compared to the Proposed Project, since the Adaptive Reuse Alternative only includes the demolition and construction of the North Block. Further, the duration of the construction period under this alternative would be shorter than the Proposed Project's construction period as there would be a reduction in the total building volume. The Adaptive Reuse Alternative would result in a less than significant impact. Since the Adaptive Reuse Alternative would maintain the two existing buildings on the South Block and only redevelop the North Block, the Adaptive Reuse Alternative would have a reduced impact when compared to the Proposed Project.

b. Operation

A significant impact would occur if a project would generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, or if a project, would conflict with applicable plans, policies, or regulations adopted for the purpose of reducing greenhouse gas emissions. greenhouse gas emissions are currently generated at the Project Site by stationary sources, such as space and water heating, electricity use, water use, solid waste generation, and mobile vehicle traffic traveling to and from the Project Site. Operation of the Adaptive Reuse Alternative would increase air pollution emissions from stationary sources and mobile sources and contribute to increased greenhouse gas emissions compared to the existing operations on-site, which include partially vacant commercial uses.

The Proposed Project would include a total of 369 dwelling units, which includes 142 dwelling units on the North Block and 227 dwelling units on the South Block, and 22,000 square feet of ground floor commercial uses on the South Block. The Adaptive Reuse Alternative includes a total of 223 dwelling units, which includes 142 dwelling units on the North Block and 81 dwelling units on the South Block, and 9,810 square feet of ground floor commercial uses on the South Block. As such, the Adaptive Reuse Alternative would be smaller than the Proposed Project by approximately 146 dwelling units and 12,190

square feet of commercial space. The Adaptive Reuse Alternative would comply with the energy efficiency requirements of the L.A. Green Building Code, as applicable for an adaptive reuse project. Further, the Adaptive Reuse Alternative would implement Mitigation Measure E-1, which require 20 percent of parking spaces on-site to be able to support electric vehicle supply equipment. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. The Adaptive Reuse Alternative would result in a less than significant impact. Compared to the Proposed Project, the Adaptive Reuse Alternative would have reduced impacts relating to greenhouse gas emissions.

6. Hazardous Materials and Risk of Upset

A significant impact may occur if a project produces a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; if a project would upset and accidently release hazardous materials into the environment; if a project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or if a project is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

As described above, the Project Site is identified on the following databases: HAZNET, CHMIRS, EDR Historic Auto Station and EDR Historic Cleaners. The Good Samaritan Hospital, located to the southwest of the Project Site was identified as a Leaking Underground Storage Tank (LUST) and EDR Historic Auto Station site, and the adjacent property to the southeast was identified as a UST, CA FID UST, HIST UST, and SWEEPS UST site in the regulatory database report. No current or historical recognized environmental conditions were identified on-site. Although, environmental issues were identified regarding the historical uses of the Project Site, which included dry cleaning facilities and automotive repair operations that may have impacted the soil and groundwater with petroleum hydrocarbons and VOCs. Subsurface petroleum hydrocarbons and fuel-related VOC contaminants at the Project Site have been identified in two distinctly different distributions in the subsurface of the Project Site and are likely resultant of two (or potentially more) different sources.

The Adaptive Reuse Alternative includes construction on the North Block, which would include the demolition of the existing parking structure. Aside from interior renovations, no new construction or earthwork activities would occur on the South Block. The Applicant would be required to provide letters to the Department of Building and Safety indicating that no Asbestos-Containing Materials or lead-based paint are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. Additionally, should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. Similar mitigation measures as discussed in Section IV.F, Hazardous Materials and Risk of Upset, requiring communication and coordination with administrators at the LAUSD and efforts to ensure safe routes to schools during construction would also apply to the Adaptive Reuse Alternative. With the implementation of the identified mitigation measure, the Adaptive Reuse Alternative would have a less than significant impact

with respect to the hazardous materials. When compared to the Proposed Project, the Adaptive Reuse Alternative would have similar and essentially equivalent impacts upon hazards and risk of upset.

7. Land Use and Planning

Similar to the Proposed Project, the Adaptive Reuse Alternative would require a Project Permit Compliance Approval of the Central City West Specific Plan and Specific Plan exceptions regarding setbacks on the North Block and deviation from the street standards for 5th Street. However, the Adaptive Reuse Alternative would also require a Specific Plan Exception to provide less than 38 trees within the South Block as there would be less space on the ground level between the existing building and the public right-of-way to plant new trees, a Zoning Administrator's Determination to permit the Adaptive Reuse of the South Block and to permit parking to be located within the North Block; and a Zone Variance to locate commercial parking for the South Block to be located within the R5 zone of the North Block. This Alternative would eliminate the Proposed Project's request for a building setback on the South Block and would also eliminate the request to average or reallocate the permitted density and floor area within the South Block as the residential uses would be within the existing buildings. This Alternative would also eliminate the request for a Director's Decision to allow a 10% increase in the qualifying area of interior open space. With approval of the requests described above, the Adaptive Reuse Alternative would be in conformance with applicable provisions of the LAMC, General Plan, and Central City West Specific Plan. Land use impacts would be less than significant under this alternative. Compared to the Proposed Project, this alternative would generate similar impacts as the Proposed Project.

8. Noise

a. Construction

Construction noise under the Adaptive Reuse Alternative would be reduced with respect to the level of noise occurring on a daily basis during construction, as the proposed construction activities would be limited to interior improvements and would not entail any earthwork or grading activities on the South Block. The construction activities and associated noise impacts would be similar in nature as described under the Proposed Project for the North Block. The overall duration of the construction period would be reduced commensurate with the reduction in building volume on the Project Site. The same construction noise mitigation measures and code compliance requirements identified in Section IV.H, Noise, would also be applicable to this alternative. Nevertheless, construction noise impacts would be significant and unavoidable, and similar to the Proposed Project.

b. Operation

The operational noise generated under the Adaptive Reuse Alternative would be typical of that of residential and commercial land uses and would be consistent with the noise that already exists in the Project Site area. As discussed above, the Adaptive Reuse Alternative would be smaller than the Proposed Project by approximately 146 dwelling units and 12,190 square feet of commercial space. Therefore, operational noise levels under this alternative would be lower than the Proposed Project. Nevertheless, the same operational noise mitigation measure (MM H-6) and code compliance requirements identified in

Section IV.H, Noise, would also be applicable to this alternative. Thus, operational noise impacts would be less than significant and similar to the Proposed Project.

9. Population, Housing, and Employment

As discussed in Section IV.I, Population, Housing, and Employment, the Proposed Project would be consistent with the Westlake Community Plan and the SCAG 2016-2040 RTP/SCS growth projections. The Adaptive Reuse Alternative includes a total of 223 dwelling units, which includes 142 dwelling units on the North Block and 81 dwelling units on the South Block, and 9,810 square feet of ground floor commercial uses. As such, the Adaptive Reuse Alternative would be smaller than the Proposed Project by approximately 146 dwelling units and 12,190 square feet of commercial space. Since this alternative would generate fewer residents and housing units than the Proposed Project, this alternative would also be within the Westlake Community Plan and the SCAG 2016-2040 RTP/SCS growth projections and would also result in a less than significant impact. The Adaptive Reuse Alternative would generate fewer employees and residents proportional to the reduction in commercial and residential square footage, respectively. Impacts to population, housing, and employment under this alternative would be less than significant and would be reduced compared to the Proposed Project.

10. Public Services

A significant impact would occur if a project were to increase the number of on-site persons beyond the allowable capacity for the Project Site and for the buildings on-site. The Proposed Project was found to have a less than significant impact on fire protection services, schools, and parks. With regards to police protection services, the Proposed Project would implement Mitigation Measures MM J.2-1 through MM J.2-3, which would reduce the Proposed Project's impacts to a less than significant level on police services.

As discussed above, the Adaptive Reuse Alternative would be smaller than the Proposed Project by approximately 146 dwelling units and 12,190 square feet of commercial space. Since the Adaptive Reuse Alternative is smaller than the Proposed Project, this alternative would create less of a demand on fire protection services, police protection services, and schools with the reduction of on-site residents. Similar to the Proposed Project, the Adaptive Reuse Alternative would also implement Mitigation Measures MM J.2-1 through MM J.2-3. With the implementation of MM J.2-1 through J.2-3, this alternative would result in a less than significant impact to public services. When compared to the Proposed Project, the Adaptive Reuse Alternative would have a reduced impact on fire protection services, police protection services, and schools.

As shown in Table V.C-3, this alternative would be required to provide 14,700 square feet of open space and proposes to provide 15,060 square feet of common open space and 5,310 square feet of private open space on the South Block. With the payment of the applicable park and recreation dwelling unit construction tax, this alternative would result in a less than significant impact with respect to parks. Compared to the Proposed Project, the Adaptive Reuse Alternative would have a slightly increased impact on local parks.

11. Traffic / Transportation

Similar to the Proposed Project, development of this alternative may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, similar to the Proposed Project, the Adaptive Reuse Alternative would not cause permanent alterations to vehicular circulation routes and patterns or impede public access or travel upon public rights-of-way. This alternative would also be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the Adaptive Reuse Alternative would not be expected to result in inadequate emergency access, and similar to the Proposed Project a less than significant impact would occur.

As concluded in Section IV.K, Traffic and Transportation, the addition of Proposed Project traffic would not create a significant impact at any of the ten study intersections, and any increases in critical movement analysis (CMA) would be less than the threshold for a significant impact to occur. The Adaptive Reuse Alternative would be smaller than the Proposed Project by approximately 146 dwelling units and 12,190 square feet of commercial space. As such, it would generate less traffic than the Proposed Project and impacts upon area roadways would be reduced. As shown in Table V-C-4, below, the Adaptive Reuse Alternative would result in approximately 1,766 daily trips with 140 a.m. peak hour trips and 145 p.m. peak hour trips. As compared to the existing conditions, this alternative would reduce traffic as it would generate 393 fewer average daily trips with 20 fewer trips during the a.m. peak hour and 42 fewer trips during the p.m. peak hour. Thus, similar to the Proposed Project, traffic impacts at the ten study intersections would be less than significant, and traffic impacts would be reduced under this alternative compared to the Proposed Project.

Table V.C-4
Net Trip Generation Comparison of the Existing Conditions, Proposed Project, and the Adaptive Reuse Alternative

Comparative Scenarios	ADT	AM Peak Hour Trips	PM Peak Hour Trips
Existing Conditions	2,159	160	187
Proposed Project Gross Trips	2,746	206	240
Proposed Project Net Trips [a]	587	46	53
Adaptive Reuse Alternative Gross Trips	1,766	140	145
Adaptive Reuse Alternative Net Trips	-393	-20	-42

Notes:
ADT = Average Daily Trips
[a] *The Net trip generation is the total Proposed Project trips less existing trips. (See Table 5 of the Traffic Study in Appendix J).*
[b] *The Net trip generation is the total trips generated by the Adaptive Reuse Alternative minus the existing trips.*
Source: Parker Environmental Consultants.

12. Utilities and Service Systems

a. Water

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Adaptive Reuse Alternative as compared to the Proposed Project and would be less than significant. With respect to anticipated water demands, the Adaptive Reuse Alternative would result in a decrease in water demand as this alternative would result in 146 fewer dwelling units and 12,190 fewer square feet of commercial retail space. Under the Proposed Project, the anticipated water demand is expected to result in a net increase of 30,666 gallons per day or approximately 34 acre feet of water per year. Comparatively, as shown in Table V.C-5, below, the net water demand associated with the Adaptive Reuse Alternative is approximately 8,947 gpd or 10 acre feet per year. The 2015 UWMP has evaluated the City's water supply in comparison to the 2012 RTP growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region. Similar to the Proposed Project, because this alternative would not exceed the planned growth projections for the existing General Plan and zoning density requirements of the Project Site, the projected water demands associated with the

Table V.C-5
Estimated Water Demand by the Adaptive Reuse Alternative

Type of Use	Quantity Unit	Water Use (gpd/unit)	Proposed Water Demand (gpd)	(AFY)
Existing Uses				
General Office	27,204 sf	0.18 gpd / sf	4,897	27
Medical/Dental Office	58,112 sf	0.3 gpd / sf	17,434	
High-Turnover Restaurant (996 sf)	66 seat [b]	24 gpd / seat	1,584	
		Existing Water Demand:	**23,915**	
Adaptive Reuse Alternative Proposed Uses				
Residential Units (223 total du)				
Studio	140 du	90 gpd / du	12,600	29
One Bedroom	34 du	132 gpd / du	4,488	
Two Bedroom	44 du	180 gpd / du	7,920	
Three Bedroom	5 du	228 gpd / du	1,140	
		Residential Total:	***26,148***	
Commercial Uses (9,810 total sf)				
Retail	6,410 sf	60 gpd / 1,000 sf	385	8
Restaurant (2,200 sf)	147 seat [b]	36 gpd / seat	5,292	
Coffee Shop	1,200 sf	864 gpd / 1,000 sf	1,037	
		Commercial Subtotal:	***6,714***	
		Total Adaptive Reuse Alternative Water Demand:	**32,862**	**37**
		Less Existing Demand:	*-23,915*	*-27*
		Net Additional Water Demand:	**8,947**	**10**

Notes: du: dwelling unit, sf: square feet, gpd: gallons per day; AFY: acre feet per year
All numbers rounded to the nearest gpd or AFY.
[a] *Rates provided by LADWP in their correspondence letter dated January 10, 2017. Water consumption is assumed to be 120% of wastewater generation.*
[b] *Restaurant assumes 15 sf/seat. Source: California Green Building Code, Chapter 10, Table 1004.1.2*
Source: Parker Environmental Consultants.

Adaptive Reuse Alternative can be accommodated by the City's water supply. Therefore, similar to the Proposed Project, this alternative would result in less than significant impacts. Compared to the Proposed Project, water demands would be further reduced under this alternative.

b. Wastewater

Similar to the Proposed Project, the Adaptive Reuse Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. The Adaptive Reuse Alternative would result in a decrease in wastewater generation as this alternative would result in 146 fewer dwelling units and 12,190 fewer square feet of commercial retail space. Under the Proposed Project, the anticipated wastewater generation is expected to result in a net increase of 25,555 gpd. Comparatively, as shown in Table V.C-6, below, the net wastewater generation associated with the Adaptive Reuse Alternative is approximately 7,456 gpd, or roughly 29 percent of the Proposed Project's wastewater generation.

Table V.C-6
Estimated Wastewater Generation by the Adaptive Reuse Alternative

Type of Use	Size	Wastewater Demand Rate (gpd/unit) [a]	Total Wastewater Demand (gpd)
Existing Uses			
General Office	27,204 sf	0.15 gpd / sf	4,081
Medical/Dental Office	58,112 sf	0.25 gpd / sf	14,528
High-Turnover Restaurant (996 sf)	66 seat [b]	20 gpd / seat	1,320
		Existing Wastewater Generation:	**19,929**
Adaptive Reuse Proposed Uses			
Residential Units (223 total du)			
Studio	140 du	75 / du	10,500
One Bedroom	34 du	110 / du	3,740
Two Bedroom	44 du	150 / du	6,600
Three Bedroom	5 du	190 / du	950
		Residential Subtotal:	***21,790***
Commercial Uses (9,810 total sf)			
Retail	6,410 sf	50 gpd / 1,000 sf	321
Restaurant (2,200 sf)	147 seat [b]	30 gpd / seat	4,410
Coffee Shop	1,200 sf	720 gpd / 1,000 sf	864
		Commercial Subtotal:	***5,595***
		Total Adaptive Reuse Alternative Wastewater Generation:	**27,385**
		Less Existing Wastewater Generation:	*-19,929*
		Net Total Wastewater Generation:	**7,456**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] *Rates provided by LADWP in their correspondence letter dated January 10, 2017*
[b] *Restaurant assumes 15 sf/seat. Source: California Green Building Code, Chapter 10, Table 1004.1.2.*
Source: Parker Environmental Consultants.

As concluded in Section IV.L-2, Wastewater, the existing wastewater infrastructure on the Project Site for the existing commercial office and medical office buildings would be expected to adequately serve the Proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. As the projected demands associated with

the Adaptive Reuse Alternative are less than the Proposed Project, the same conclusion can be reached that this Alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment.

c. Energy Conservation

As discussed in Section IV.L-3, Public Utilities, Energy, of the EIR, the estimated net increase in electricity consumption by the Proposed Project would be approximately 3,115,647 kilowatts per year. As shown in Table V.C-7, Estimated Electricity Demand by the Adaptive Reuse Alternative, below, the estimated net increase in electricity consumption by the Adaptive Reuse Alternative would be approximately 1,250,510 kilowatts per year, which is roughly 40 percent of the energy demand of the Proposed Project.

Table V.C-7
Estimated Electricity Demand by the Adaptive Reuse Alternative

Land Use	Size	Electricity Demand Rate (kWh/unit/year) [a]	Total Electricity Demand (kWh/year)
Existing Uses			
General Office	27,204 sf	12.95 kWh/sf/year	352,292
Medical/Dental Office	58,112 sf	12.95 kWh/sf/year	752,550
High-Turnover Restaurant	996 sf	47.45 kWh/sf/year	47,260
Parking Garage	59,492 sf	4.35 kWh/sf/year	258,790
		Existing Electricity Demand:	**1,410,892**
Adaptive Reuse Alternative Uses			
Multi-Family Residential	223 du	5,626.5 kWh/du/year	1,254,710
Retail	6,410 sf	13.55 kWh/sf/year	86,858
Restaurant/Coffee Shop	3,400 sf	47.45 kWh/sf/year	161,330
Parking Garage	110,334 sf	10.5 kWh/sf/year	1,158,507
		Total Adaptive Reuse Alternative Electricity Demand:	**2,661,402**
		Less Existing Electricity Demand:	*-1,410,892*
		Net Total Electricity Demand:	**1,250,510**

Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour
[a] *SCAQMD, CEQA Air Quality Handbook, Table A9-11-A: Electricity Usage Rate. 1993.*
Source: Parker Environmental Consultants.

The projected increase in electrical demand due to the Proposed Project would not have an adverse impact on its electrical system. Energy supplies are adequate to serve the Proposed Project, and the installation of needed new infrastructure would not be expected to result in any significant secondary environmental effects. Similar to the Proposed Project, the Adaptive Reuse Alternative would exceed Title 24 energy efficiency requirements and further reduce demand for electricity under the Adaptive Reuse Alternative. Because the Adaptive Reuse Alternative would demand less energy than the Proposed Project, impacts would be similarly less than significant and further reduced as compared to the Proposed Project.

The EIR concluded the Proposed Project's net natural gas demands are estimated to be approximately 1,350,908 cubic feet (cf) per month, or approximately 16,210,896 cf/year. As shown in Table V.C-8, below, the estimated net increase in natural gas demands by the Adaptive Reuse Alternative would be approximately 719,764 cf/month, which is roughly 53 percent of the natural gas demand of the Proposed Project.

Table V.C-8
Estimated Natural Gas Demand by the Adaptive Reuse Alternative

Land Use	Size	Natural Gas Demand Rate (cubic feet /unit/month) [a]	Total Natural Gas Demand (cubic feet/month)
Existing Uses			
General Office	27,204 sf	2.0 cf/sf/month	54,408
Medical/Dental Office	58,112 sf	2.0 cf/sf/month	116,224
High-Turnover Restaurant	996 sf	2.9 cf/sf/month	2,888
Parking Garage	59,492 sf	0 cf/sf/month	0
		Existing Natural Gas Demand:	**173,520**
Adaptive Reuse Alternative			
Multi-Family Residential	223 du	4,012 cf/du/month	870,604
Commercial/Retail	6,410 sf	2.0 cf/sf/month	12,820
Restaurant/Coffee Shop	3,400	2.9 cf/sf/month	9,860
Parking Garage	110,334 sf	0 cf/sf/month	0
		Total Adaptive Reuse Alternative Natural Gas Demand:	**893,284**
		Less Existing Natural Gas Demand:	*-173,520*
		NET TOTAL Natural Gas Demand:	**719,764**

Notes: sf =square feet; du = dwelling unit
[a] SCAQMD, CEQA Air Quality Handbook, Table A9-12-A: Natural Gas Usage Rate. 1993
Source: Parker Environmental Consultants.

Similar to the Proposed Project, it is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Adaptive Reuse Alternative. Both the Proposed Project and the Adaptive Reuse Alternative would require local infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment. Therefore, impacts associated with natural gas consumption under this alternative would be less than significant and similar to the Proposed Project, though natural gas demands would be further reduced.

d. Solid Waste

Similar to the Proposed Project, the Adaptive Reuse Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The Proposed Project's demolition and construction activities are estimated to generate approximately 14,316 tons of debris. Comparatively, as shown in Table V.C-9, Estimated Construction and Demolition Debris

Table V.C-9
Estimated Construction and Demolition Debris by the Adaptive Reuse Alternative

Construction Activity	Size	Rate [a] (lbs/sf)	Generated Waste (tons)
Demolition			
Parking Garage	59,492 sf	155 lbs/sf	4,611 tons
Total Alternative Demolition Debris Generation:			**4,611 tons**
Construction /Renovation			
Multi-Family Units	127,067 sf [b]	4.38 lbs/sf	278 tons
Commercial/Retail	9,810 sf	3.89 lbs/sf	19 tons
Parking Garage	110,334 sf	3.89 lbs/sf	215 tons
Total Construction/Renovation Debris Generation:			**512 tons**
Net Demolition and Construction/Renovation Debris Total:			**5,123 tons**

Notes: sf = square feet; lbs = pounds
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *Includes 111,272 square feet of the existing buildings on the south block proposed for adaptive reuse and 115,795 square feet of new residential floor area on the North Block.*
Source: Parker Environmental Consultants.

by the Adaptive Reuse Alternative, below, the Adaptive Reuse Alternative would generate 5,123 tons of construction and demolition debris, which equates to roughly 36 percent of the solid waste material generated by the Proposed Project.

Similar to the Proposed Project, all construction and demolition debris generated by the Adaptive Reuse Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the Proposed Project, the amount of solid waste generated during construction of the Adaptive Reuse Alternative would fall well within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the Proposed Project and less than significant, though impacts to regional landfill capacity would be further reduced.

Similar to the Proposed Project, operation of the Adaptive Reuse Alternative would cause on-going generation of solid waste throughout the lifespan of the Project. As discussed in Section IV.L-4, Public Utilities/Solid Waste, the Proposed Project would generate approximately 4,533 pounds (2.27 tons) of solid waste per day, or approximately 827 tons per year. Comparatively, as shown in Table V.C-10 below, the Adaptive Reuse Alternative would generate approximately 2,368 lbs/day of solid waste or approximately 432 tons per year. Operational solid waste under the Adaptive Reuse Alternative would be approximately 52 percent of the solid waste generated by the Proposed Project. Therefore, similar to the conclusion regarding the Proposed Project, solid waste impacts under the Adaptive Reuse Alternative would be less than significant upon regional solid waste disposal resources, though impacts to regional landfill capacity would be further reduced under this alternative.

Table V.C-10
Estimated Operational Solid Waste Generation by the Adaptive Reuse Alternative

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses			
General Office	27,204 sf	0.006 lbs/sf/day	163
Medical/Dental Office	58,112 sf	0.007 lbs/sf/day	407
High-Turnover Restaurant (996 sf)	10 emp [b]	10.53 lbs/emp/day	105
Parking Garage	59,492 sf	0 lbs/sf/day	0
		Existing Solid Waste Generation:	**675**
Adaptive Reuse Alternative			
Multi-Family Residential	223 du	12.23 lbs/du/day	2,727
Commercial (9,810 sf)	30 emp [b]	10.53 lbs/employee/day	316
		Total Adaptive Reuse Alternative Solid Waste Generation:	**3,043**
		Less Existing Uses:	*-675*
		NET TOTAL Solid Waste Generation:	**2,368**

Notes: sf =square feet; du = dwelling units; emp = employee
[a] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[b] *Employee generation based on Section IV.I, Population, Housing, and Employment.*
Source: Parker Environmental Consultants.

V. PROJECT ALTERNATIVES
D. COMMERCIAL REUSE ALTERNATIVE (RETAIL/OFFICE ON THE SOUTH BLOCK AND RESIDENTIAL ON THE NORTH BLOCK)

A. DESCRIPTION OF THE ALTERNATIVE

The Commercial Reuse Alternative consists of a new residential development project on the North Block with the preservation and commercial re-use of the existing buildings on the South Block with commercial office and retail land uses. Under this Alternative, a total of 142 residential units would be provided with 84,305 square feet of commercial area consisting of approximately 74,495 square feet of general office floor area and 9,810 square feet of ground floor retail space. A summary of the development program under this alternative is provided in Table V.D-1, Commercial Reuse Alternative Project, below. The increased parking demands associated with retaining the existing office uses on the South Block would require a redesign of the multi-family residential building on the North Block to include 7 levels of parking (two below grade and five above grade) and would necessitate constructing a high-rise residential building with 10 residential levels above the parking podium. The total height of the building would increase to approximately 150 feet above grade.

Table V.D-1
Commercial Reuse Alternative Project

Land Uses	Units (DU or SF)	Floor Area (Square Feet)
Proposed Project:		
North Block		
Studio Units	56	*132,550 sf*
1-Bedroom Units	45	
2-Bedroom Units	30	
3-Bedroom Units	11	
North Building Residential Subtotal	***142 du***	
South Block		
Building A		
General Office	54,395 sf	*54,395 sf*
Subtotal Building A	*54,395 sf*	
Building B		
General Office	20,100 sf	*30,077 sf*
Ground Floor Retail	9,810 sf	
Subtotal Building B	*29,910 sf*	
South Block Commercial Subtotal	***84,305 sf***	
TOTAL	**Residential: 142 DU** **Commercial: 84,305 SF**	**216,855 sf**

Source: Steinberg Architects, August 15, 2016.

1. North Block

The North Block is currently developed with a 3-level parking structure. This parking structure currently supports the existing medical office building uses on the South Block. This alternative would result in the demolition of the existing parking structure and the construction of a new mid-rise multi-family residential building with 142 dwelling units and 452 parking spaces. Parking would be provided below and above grade to meet the residential and office parking demand for both the North Block and South Block. The development on the North Block would be the same as proposed under the Proposed Project, with 142 multi-family residential dwelling units and 132,550 square feet of floor area.

Architectural features for the North Block would include a mix of materials and architectural elements, which may include but is not limited to: aluminum windows, pre-finished metal panels, painted metal railing, glass railing, vinyl window, exterior plaster, and composite siding. Building elevations depicting the scale and massing of the proposed structure are shown in Figure II-24, North Building – North and South Elevation. The typical floor plan layout would be the same as proposed under the Proposed Project.

2. South Block

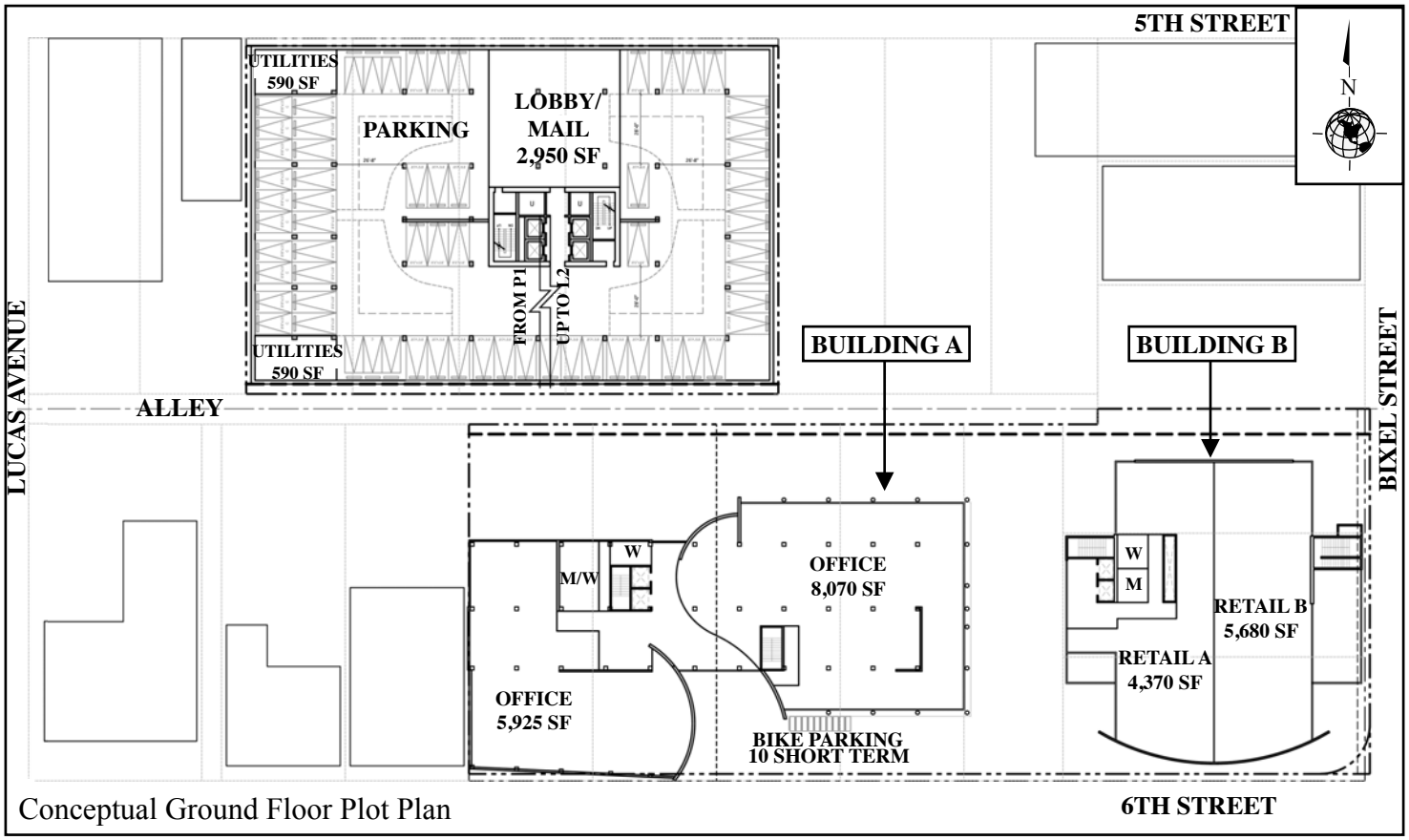
a. Building A

The existing 5-story building located at 1115-1135 W. 6th Street (Building A) is currently developed with approximately 69,160 square feet of gross floor area and is improved with approximately 59,738 leasable square feet of commercial office and medical office land uses with a 996 square foot restaurant. Under this alternative, the existing Building A on the South Block would be rehabilitated and would operate as general office. Under this alternative the interior space of Building A would be renovated and reconfigured to provide 54,395 square feet of floor area. All changes would be done in conformance with the Secretary of Interior's Standards for the Rehabilitation of Historic Buildings. No major alterations to the exterior of Building A are proposed.

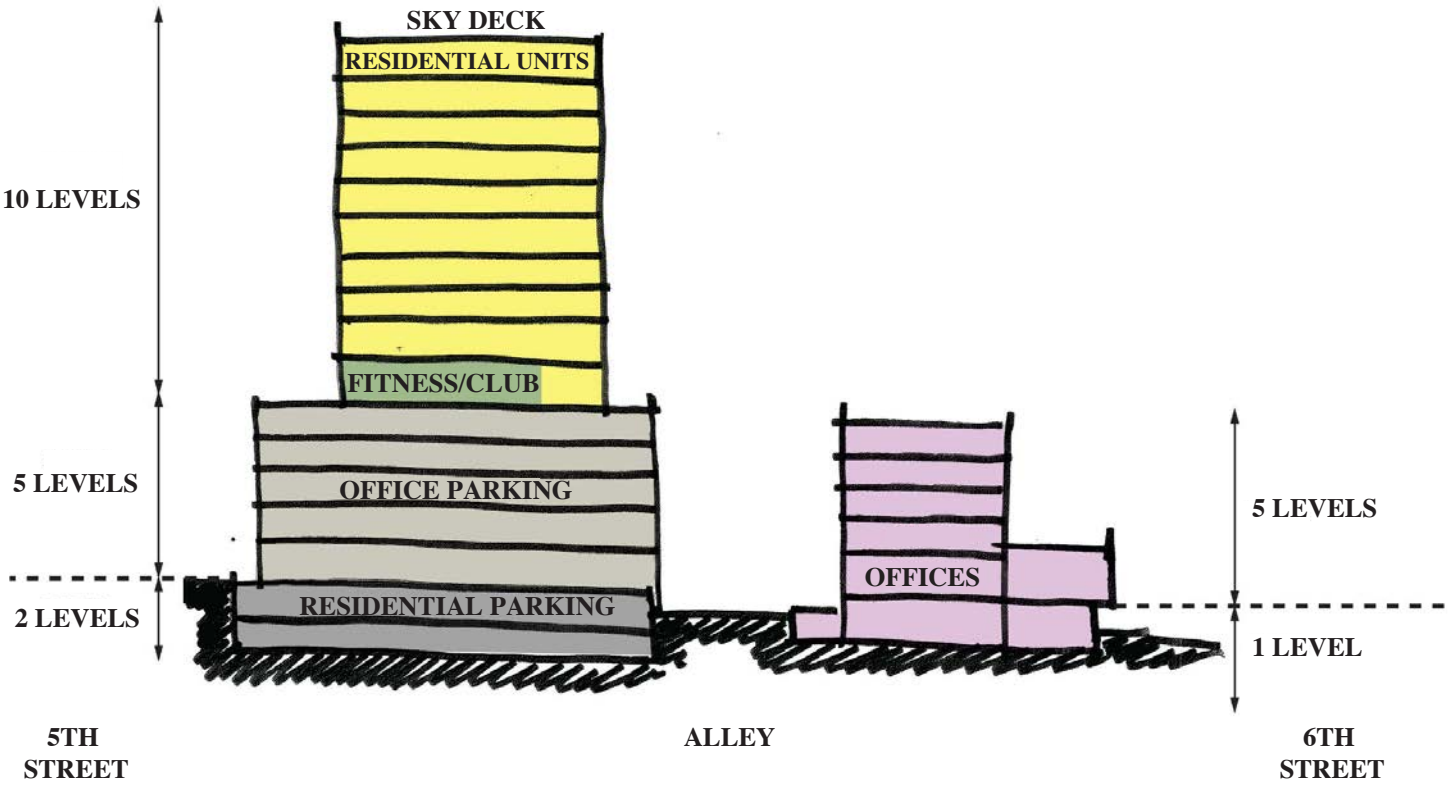
b. Building B

The existing 4-story building located at 1101-1113 W. 6th Street and 517 and 521 S. Bixel Street (Building B) is currently developed with approximately 42,112 square feet of gross floor area and is improved with approximately 37,504 leasable square feet of commercial office and medical office land uses. Under this alternative, the existing Building B on the South Block would be rehabilitated to provide 20,100 square feet of general office uses and 9,810 square feet of retail land uses. Similar to the Proposed Project, for analytical purposes the retail uses are assumed to include 6,410 square feet of general retail space, approximately 2,200 square feet of restaurant uses, and a 1,200 square foot coffee shop.

An illustrative site plan and cross section rendering of this alternative is provided in Figure V.D-1, Commercial Reuse Alternative (Residential/Office/Retail) Conceptual Site Plan and Cross Section.



Conceptual Ground Floor Plot Plan



Conceptual Building Cross Section

Source: Steinberg, August 15, 2016.

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Figure V.D-1
Commercial Reuse Alternative (Residential/Office/Retail)
Conceptual Site Plan and Cross Section

3. Parking

Parking for the Proposed Project would be provided within the new residential building on the North Block. Buildings A and B on the South Block do not have any existing space allocated for parking areas and have existing covenants that require the parking demands to be accommodated in the neighboring North Block. Thus, all parking would be provided in the structured parking garage on the North Block. Vehicular access to the North Building would be provided via one ingress/egress driveway on the alleyway. On-site parking would serve the residential parking demands for the North Building and Buildings A and B on the South Block and the retail parking demand for Building B. Similar to the Proposed Project, the alley would be converted to a one-way westbound operation.

As summarized in Table V.D-2, below, this Alternative would require and provide a total of 454 parking spaces with 137 residential spaces for the North Building, and 315 commercial spaces for Buildings A and B on the South Block. Similar to the Proposed Project, this Alternative would seek a 10 percent reduction in the number of residential stalls required.

Table V.D-2
Summary of Required and Proposed Parking Spaces for the Commercial Reuse Alternative

Description	Quantity	Parking Required by Code [a]		Parking Provided
		Rate	Spaces	
North Block				
Residential				
Less than three habitable rooms	56	1.00 stall/du	56	***137***
Three habitable rooms	45	1.00 stall/du	45	
More than three habitable rooms	41	1.25 stall/du	51	
		10% Reduction [b]	*-15*	
		Subtotal Residential	***137***	
South Block				
General Office	74,495 sf	1.7 stalls / 1,000 sf [c, d]	126	***315***
Neighborhood Serving Commercial	9,810 sf	2 stalls / 1,000 sf [e]	20	
		Subtotal Commercial	***146***	
		Total Required Parking With Covenants	**454 [f]**	**454**

Notes:
du = dwelling unit, sf = square feet
[a] *LAMC 12.21.A.4(p)*
[b] *Bicycle Parking Ordinance (No. 182,386), March 13, 2013.*
[c] *CCWSP Section 10 A (Office Use).*
[d] *CCWSP Section 10. Requires 15% of the parking to be provided for HOV spaces.*
[e] *LAMC Section 12.21 A4(x) (3)(6).*
[f] *Pursuant to existing covenants, the number of existing spaces in the off-site parking structure on the North Block must be maintained to serve the parking demands of the commercial office land uses on the South Block. As the covenants would result in a greater number of required spaces than would be allowed per the LAMC, a total of 315 spaces would be required for the South Block.*
Source: Steinberg Architects, August 15, 2016.

Similar to the existing conditions and pursuant to the LAMC and existing parking covenants[3], all existing parking stalls for the South Block would be provided and maintained on the North Block. To accommodate the additional parking within the North Block, the North Building would provide seven levels of parking. For purposes of this alternative, it is assumed that two levels of parking would be provided below grade and five levels of parking would be provided above grade.

4. Open Space and Landscaping

Open space courtyards and landscaping features are proposed throughout the Proposed Project. Amenities proposed within the common open space areas within the North Building include swimming pools, spas, landscaped courtyards, cabana, outdoor seating, clubhouse, fitness center, skydeck, ping pong table, fire pit, barbeque areas, outdoor relaxing areas, outdoor kitchen, and dog wash station. Similar to the Proposed Project, this alternative's landscape palate for the North Building would feature ornamental plants and drought-tolerant species.

The open space requirements and amount of open space proposed for the Commercial Reuse Alternative are summarized in Table V.D-3, Summary of Required and Proposed Open Space Areas Commercial Reuse Alternative, below. As shown in Table V.D-3, the Commercial Reuse Alternative would include 29,100 square feet of open space within the North Building. Similar to the Proposed Project the three existing street trees along 5th Street would be removed and replaced in consultation with the City of Los Angeles Division of Urban Forestry and approved by the Department of Public Works.

Table V.D-3
Summary of Required and Proposed Open Space Areas for the Commercial Reuse Alternative

LAMC Open Space Requirements [a]	Dwelling Units		Open Space Required (square feet)	
	North Block	South Block	North Block	South Block
Less than three habitable rooms (100 sf/du)	101	0	10,100	0
Three habitable rooms (125 sf/du)	30	0	3,750	0
More than three habitable rooms (175 sf/du)	11	0	1,925	0
Total Required	**142**	**0**	**15,775**	**0**
Proposed Open Space			**Open Space Proposed (square feet)**	
Common Open Space	--	--	27,550	0
Private Open Space [b]	--	--	1,550	0
Total Proposed	**142**	**0**	**29,100**	**0**

Notes:
[d] *LAMC 12.21.G and Central City West Specific Plan*
[e] *Per the Central City West Specific Plan, 50 sf/unit may be counted towards required open space if 150 sf/unit is provided on at least 50% of units.*
Source: Steinberg Architects, August 15, 2016.

[3] *Pursuant to "Covenant and Agreement Regarding Maintenance of Off-Site Parking Space" recorded May 24, 2004 as Instrument No. 04-1322563 of Official Records, and "Affidavit Regarding Maintenance of Parking" recorded April 04, 2006 as Instrument No. 06-0726827 of Official Records. Both covenants require parking to be maintained on the North Block for the benefit of the existing land uses on the South Block. (See Appendix K, Parking Covenants to this DEIR.)*

5. Architectural Features

Under the Commercial Reuse Alternative, the scale and massing of the North Block would be altered substantially to accommodate the increased parking demands. As a result of retaining the existing buildings in place on the South Block, all parking for the South Block would be provided on the North Block. For purposes of this alternative, it is assumed that parking within the North Building would include two levels of subterranean parking and five levels of parking above grade. The building height of the North Building would increase by approximately 52 feet from 98 feet and 2 inches to approximately 150 feet. The height of the structure would be approximately 526 feet above mean sea level (MSL), which is still well below the CCWSP's maximum height limit of 1,218 feet above MSL. The below grade parking garage would be similar to the Proposed Project. The additional five parking levels above grade would alter the scale and character of the proposed building in that the residential units would start on the sixth level and would include 10 residential floors with a smaller building footprint atop the parking podium.

6. Entitlement Requests

Discretionary entitlements, reviews, and approvals required for implementation of the Commercial Reuse Alternative would include, but may not be limited to:

1. Pursuant to Los Angeles Municipal Code ("LAMC") Section 11.5.7-C, a Project Permit Compliance Approval of the Central City West Specific Plan ("CCWSP").
2. Pursuant to LAMC Section 11.5.7-F, the Applicant requests the following Specific Plan Exceptions of the Central City West Specific Plan:
    a. To allow a (0) zero-foot front yard setback for the North Building, in lieu of the 15 ft.; as required by the CCWSP, Section 6.F-2,

    b. To allow (0) zero-foot side yard setbacks for the east and west property lines for the North Building, in lieu of the 10 ft. required by the CCWSP, Section 6.F-2,

    c. To allow a (0) zero-foot rear yard setback for the seven-story North Building, in lieu of the 19 ft. (15 ft.+ 1 ft. above the 3rd floor) required by the CCWSP, Section 6.F-2,

    d. To deviate from the street standards of 5th Street, as required by the CCWSP Appendix C.1.K to be consistent with the newly adopted Mobility Plan.

3. A Variance to allow commercial parking in the R5 Zone to accommodate the commercial parking requirements for the South Building.

Pursuant to various sections of the LAMC, the Applicant will request approvals and permits from the Department of Building and Safety (and other municipal agencies) for Project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route, removal of existing street trees, and building and tenant improvements. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the

Proposed Project.

B. ENVIRONMENTAL ANALYSIS

1. Aesthetics

The Project Site is located in a Transit Priority Area. Similar to the Proposed Project, Commercial Reuse Alternative's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

The Commercial Reuse Alternative would involve the demolition of the parking structure and the construction of 142 residences on the North Block and the rehabilitation of the two commercial office and medical office buildings as future general office and retail uses on the South Block. The Commercial Reuse Alternative would revitalize the two commercial office and medical buildings on the South Block and would generally maintain the existing views of the South Block along W. 6th Street and Bixel Street (refer to Figures IV.A-1 through IV.A-3).

The Commercial Reuse Alternative would enhance views of the Project Site along W. 5th Street with the demolition of the parking structure and the construction of a residential building with 142 multi-family units that would be visually consistent with the residential buildings that front the north side of W. 5th Street. The residential building proposed for the North Block would increase in height by approximately 8 levels or 50 feet as compared to the Proposed Project as this alternative would include five levels of above grade parking. Since new building construction under the Commercial Reuse Alternative would be limited to the North Block, this alternative would have minimal impacts of views of downtown Los Angeles along W. 6th Street. Private views from neighboring residential land uses would be blocked, however, private views are not protected by ordinance and thus the increased obstruction of views would be considered less than significant. Further, the Commercial Reuse Alternative would adhere to code compliance measures to ensure the upkeep and aesthetic quality of the Project Site, as discussed in Section A.1, Aesthetics. As required by the CCWSP's Urban Design Guidelines, all open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with the LAMC. Additionally, every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104. With regards to views, the Commercial Reuse Alternative would result in a less than significant impact. Since the Commercial Reuse Alternative would maintain the two existing buildings on the South Block and would visually improve the North Block by removing the parking structure, the Commercial Reuse Alternative would have a reduced impact when compared to the Proposed Project.

The Commercial Reuse Alternative would generally retain the existing sources of lighting and glare on the South Block, but has the possibility of increasing nighttime lighting and daytime glare sources along W. 6th Street and Bixel Street. The Commercial Reuse Alternative would increase nighttime lighting and daytime glare sources along W. 5th Street as the conversion of the North Block to residential uses would

increase daytime and especially nighttime activity on the Project Site. Nighttime lighting would be generated through light radiating from windows of the residences, security and pedestrian lighting fixtures, and parking garage. Glare may be generated in the Project area by Project residents and guests parking their vehicles on surrounding streets. While the residential building on the North Block would be constructed with materials designed to reduce glare, it is still likely that the façade materials and windows would generate some degree of glare. The two buildings on the South Block would generally continue generating the same amount of glare. Similar to the Proposed Project, the Commercial Reuse Alternative shall comply with Section 99.05.106.8, Light Pollution Reduction, of the City of Los Angeles Green Building Code (Ord. 182849) to ensure that lighting impacts would be reduced. With regard to nighttime lighting and daytime glare, the Commercial Reuse Alternative would result in a less than significant impact but slightly increased impacts as compared to the Proposed Project.

2. Air Quality

a. Construction

A significant impact would occur if a project would considerably increase the release of criteria pollutants for which the project region is in non-attainment; if a project would conflict with applicable air quality plans or violate any air quality standards; or if a project were to create objectionable odors affecting a substantial number of people. The Commercial Reuse Alternative would generate less construction emissions compared to the Proposed Project, since the Commercial Reuse Alternative only includes the demolition and construction of the North Block. This alternative would require the export of approximately 36,599 cubic yards of soil, a reduction of approximately 62 percent as compared to the Proposed Project. Further, the duration of the construction period under this alternative is expected to be reduced commensurate with the reduction in building volume. Similar to the Proposed Project, the Commercial Reuse Alternative would be required to comply with applicable SCAQMD rules and regulations for new or modified sources, such as SCAQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings), which are further discussed in Section IV.B, Air Quality. The Commercial Reuse Alternative would result in a less than significant impact. Since the Commercial Reuse Alternative would maintain the two existing buildings on the South Block and only redevelop the North Block, this Alternative would have a less than significant and reduced construction air quality impact when compared to the Proposed Project.

b. Operation

Operational air pollutant emissions are generated at the Project Site by stationary sources, such as space and water heating, architectural coatings (paint), consumer products. and mobile vehicle traffic traveling to and from the Project Site. The increase in tenants and guests on-site would increase air pollution emissions from stationary sources and mobile sources and contribute to increased emissions compared to the existing operations on-site, which include partially vacant commercial uses.

The Proposed Project would include a total of 369 dwelling units, which includes 142 dwelling units on the North Block and 227 dwelling units on the South Block, and 22,000 square feet of ground floor commercial uses. By comparison, the Commercial Reuse Alternative includes a total of 142 dwelling

units on the North Block and 74,495 square feet of general office space and 9,810 square feet of ground floor commercial uses on the South Block. As such, the residential component of the Commercial Reuse Alternative would be smaller than the Proposed Project by approximately 227 dwelling units, but would include 84,305 square feet of commercial uses instead of residential uses on the South Block. As discussed in further detail below under the traffic impacts discussion, Table V.D-4 shows that the Commercial Reuse Alternative would generate 369 fewer daily trips than the Proposed Project. As such, it follows that this alternative's mobile source emissions would be slightly decreased as compared to the Proposed Project. As the Proposed Project's operational emissions are more than 40 percent below the SCAQMD thresholds of significance for operational air quality impacts for all criteria pollutants, further decrease in mobile source emissions would not trigger a significant operational air quality impact. Similar to the Proposed Project, the Commercial Reuse Alternative would not violate any air quality standards and would be required to comply with applicable SCAQMD rules and regulations for new or modified sources, such as SCAQMD Rule 1138 (Odor-Reducing Equipment). The Commercial Reuse Alternative would result in a less than significant impact. Compared to the Proposed Project, the Commercial Reuse Alternative would have reduced air quality impacts.

3. Cultural Resources

a. Historic Resources

The two commercial office and medical office buildings on-site, located at 1111 W. 6th Street and 1125 W. 6th Street, were determined to be historic resources. Under the Commercial Reuse Alternative, both historic buildings on the South Block would be maintained and revitalized as commercial buildings. As such, the two historic buildings would visually maintain their current existing conditions and maintain their eligibility for historic listing. Continued occupancy and use of the existing buildings would necessitate renovations and updates to the buildings and on-site infrastructure. Under the Commercial Reuse Alternative, any potential future upgrades or renovations would conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings. Therefore, the Commercial Reuse Alternative would have a less than significant impact upon cultural resources, and impacts upon historic resources would be reduced when compared to the Proposed Project. This alternative would avoid a significant and unavoidable historic impact that would occur under the Proposed Project.

b. Archeological Resources

No known archaeological resources are known to occur within the Project Site. Under the Proposed Project, earthwork and excavation would occur on the North and South Blocks, which would have the potential to uncover unknown archaeological resources. Potential impacts upon unknown archaeological resources under the Proposed Project would be reduced to less than significant levels with adherence to applicable laws and regulations governing the protection of archaeological resources. Grading under the Commercial Reuse Alternative would have similar potential for discovery on the North Block but reduced impacts on the South Block. The buildings on the South Block would be retained in place under this alternative and thus no earthwork would occur on the South Block. Similar to the Proposed Project,

potential impacts upon archaeological resources would be less than significant, but slightly reduced as there would be no potential for archaeological resources to be impacted on the South Block.

c. Paleontological Resources

No known paleontological resources are known to occur within the Project Site. Under the Proposed Project, earthwork and excavation would occur on the North and South Blocks which would have the potential to uncover unknown paleontological resources. Potential impacts upon paleontological resources under the Proposed Project would be reduced to less than significant levels with adherence to applicable laws and regulations governing the protection of paleontological resources. Grading under the Commercial Reuse Alternative would have similar potential for resource discovery on the North Block but reduced impacts on the South Block. The buildings on the South Block would be retained in place under this alternative and thus no earthwork would occur on the South Block. Similar to the Proposed Project, potential impacts upon paleontological resources would be less than significant, but slightly reduced as there would be no potential for paleontological resources to be impacted on the South Block.

4. Geology and Soils

A significant impact may occur if a project would place a new structure or building in an area that is susceptible to geological hazards or unstable soils. As discussed in the Geotechnical Investigation for the Project Site, seismic hazards relating to surface rupture, liquefaction, lateral spreading, landsliding, subsidence, and collapse are considered low risk issues on the Project Site. The primary seismic hazard for the Project Site is the potential for strong ground motion. The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The Project is located in a seismically active region, as is all of Southern California. These geologic hazards are common and ubiquitous throughout Southern California. The Commercial Reuse Alternative would be designed and constructed in conformance with the most recently adopted California Building Code and Los Angeles Building Code design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. Further, the design and construction of the Commercial Reuse Alternative would be subject to the review and approval of the Department of Building and Safety. The Commercial Reuse Alternative would be required comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter and Project's Geotechnical Report and the requirements outlined in the latest edition of the City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, as discussed in Section IV.D, Geology and Soils. This alternative would have a less than significant impact with respect to seismic hazards. When compared to the Proposed Project, the Commercial Reuse Alternative would have similar and essentially equivalent impacts upon potential seismic hazards.

This alternative would not involve the excavation and export of soil from the South Block. Under this scenario, approximately 36,559 cubic yards of soil would be excavated from the North Block. The total amount of soil export would be reduced by approximately 62% as compared to the Proposed Project. Similar to the Proposed Project, the Commercial Reuse Alternative's construction impacts on soil erosion, sedimentation, and groundwater dewatering on the North Block would be less than significant with

compliance to the requirements outlined in the Chapter IX, Division 70 of the City's Uniform Building Code; the LID Ordinance 181,809; and the Standard Urban Stormwater Mitigation Plan (SUSMP), as stated in Section IV.D, Geology and Soils. The Commercial Reuse Alternative would also be required to implement the soil erosion control measures and LID Ordinance to control soil erosion and sedimentation within the North Block. Similar to the Proposed Project dewatering activities would comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. The Commercial Reuse Alternative would have a less than significant impact and reduced impacts with respect to the potential for soil erosion, sedimentation, and groundwater dewatering. When compared to the Proposed Project, the Commercial Reuse Alternative would have reduced impacts upon erosion and dewatering because of the smaller development area on-site.

5. Greenhouse Gas Emissions

a. Construction

The Commercial Reuse Alternative would generate less greenhouse gas emissions during construction compared to the Proposed Project, since this alternative includes the demolition and construction of the North Block and only renovation activities on the South Block. Further, the duration of the construction period under this alternative is expected to be reduced commensurate with the reduction in building volume. The Commercial Reuse Alternative would result in a less than significant impact. Since the Commercial Reuse Alternative would maintain the two existing buildings on the South Block and only redevelop the North Block, the Commercial Reuse Alternative would have a reduced impact when compared to the Proposed Project.

b. Operation

Similar to the Proposed Project, operation of the Commercial Reuse Alternative would increase air pollution emissions from stationary sources and mobile sources and contribute to increased greenhouse gas emissions compared to the existing operations on-site, which include partially vacant commercial uses. The Proposed Project would include a total of 369 dwelling units, which includes 142 dwelling units on the North Block and 227 dwelling units on the South Block, and 22,000 square feet of ground floor commercial uses on the South Block. By comparison, the Commercial Reuse Alternative includes a total of 142 dwelling units on the North Block and 74,495 square feet of commercial office and 9,810 square feet of ground floor commercial uses on the South Block. The Commercial Reuse Alternative would comply with the energy efficiency requirements of the L.A. Green Building Code, as applicable for a Commercial reuse project. Further, the Commercial Reuse Alternative would implement Mitigation Measure E-1, which require 20 percent of parking spaces on-site to be able to support electric vehicle supply equipment. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. The Commercial Reuse Alternative would result in a less than significant impact. Compared to the Proposed Project, the Commercial Reuse Alternative would have reduced impacts relating to greenhouse gas emissions.

With respect to operational GHG emissions associated with mobile sources, the Commercial Reuse Alternative would result in 88 additional average daily trips as compared to the Proposed Project. Thus, the operational GHG emissions associated with vehicles traveling to and from the Project Site during the life of this alternative would be slightly increased when compared to the Proposed Project. However, impacts to GHG emissions would still be considered less than significant, as the alternative would be consistent with the applicable state, regional, and local policies that have been enacted for purposes of reducing greenhouse gas emissions (such as promoting in fill development, providing high-density housing in transit-oriented areas, and building new construction with energy efficient features).

6. Hazardous Materials and Risk of Upset

A significant impact may occur if a project produces a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; if a project would upset and accidently release hazardous materials into the environment; if a project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or if a project is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

As described above, the Project Site is identified on the following databases: HAZNET, CHMIRS, EDR Historic Auto Station and EDR Historic Cleaners. The Good Samaritan Hospital, located to the southwest of the Project Site was identified as a Leaking Underground Storage Tank (LUST) and EDR Historic Auto Station site, and the adjacent property to the southeast was identified as a UST, CA FID UST, HIST UST, and SWEEPS UST site in the regulatory database report. No current or historical recognized environmental conditions were identified on-site. Although, environmental issues were identified regarding the historical uses of the Project Site, which included dry cleaning facilities and automotive repair operations that may have impacted the soil and groundwater with petroleum hydrocarbons and VOCs. Subsurface petroleum hydrocarbons and fuel-related VOC contaminants at the Project Site have been identified in two distinctly different distributions in the subsurface of the Project Site and are likely resultant of two (or potentially more) different sources.

The Commercial Reuse Alternative includes construction on the North Block, which would include the demolition of the existing parking structure. Aside from interior renovations, no new construction or earthwork activities would occur on the South Block. The Applicant would be required to provide letters to the Department of Building and Safety indicating that no Asbestos-Containing Materials or lead-based paint are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. Additionally, should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. Similar mitigation measures as discussed in Section IV.F, Hazardous Materials and Risk of Upset, pertaining to communication and coordination with the LAUSD and ensuring safe school pedestrian routes are maintained during the construction process would also apply to the Commercial Reuse Alternative. With implementation of identified mitigation measures, the Commercial Reuse Alternative would have a less

than significant impact with respect to the hazardous materials. When compared to the Proposed Project, the Commercial Reuse Alternative would have similar and essentially equivalent impacts upon hazards and risk of upset.

7. Land Use and Planning

Similar to the Proposed Project, the Commercial Reuse Alternative would require a Project Permit Compliance Approval of the Central City West Specific Plan; Specific Plan exceptions regarding setbacks on the North Block and deviation from the street standards for 5th Street. This alternative would eliminate the Proposed Project's request for a building setback on the South Block, the request to average or reallocate the permitted density and floor area within the South Block, and would also eliminate the request for a Director's Decision to allow a 10% increase in the qualifying area of interior open space. However, this alternative would also require a Variance to allow commercial parking in the R Zone to accommodate the commercial parking requirements for the South Building, since this alternative includes the rehabilitation of the existing commercial office and medical office buildings on-site. With approval of these requests, the Commercial Reuse Alternative would be in conformance with the applicable provisions of the LAMC and General Plan. However, this alternative would not be consistent with the Central City West Specific Plan (Section 6(G)), which requires that non-residential buildings provide a Ground Floor (as defined in the CCWSP) that provides a minimum of 75 percent coverage with neighborhood serving commercial land uses. The existing buildings on the South Block are not in conformance with this standard as the ground floor fronting 6th Street is located more than 3 feet above the sidewalk curb level. Compared to the Proposed Project, this alternative would generate increased land use consistency impacts as compared to the Proposed Project, as parking for commercial uses would be located in an R Zone, unlike the Proposed Project. Though it is anticipated that the land use inconsistencies would be remedied through Specific Plan findings as the conflicts with the CCWSP are created by the retention of a historic resource.

8. Noise

a. Construction

Construction noise under the Commercial Reuse Alternative would be reduced with respect to the level of noise occurring on a daily basis during construction, as the proposed construction activities would be limited to interior improvements and would not entail any earthwork or grading activities on the South Block. The construction activities and associated noise impacts would be similar in nature as described under the Proposed Project for the North Block. The overall duration of the construction period would be reduced commensurate with the reduction in new building on the South Block. The same construction noise mitigation measures and code compliance requirements identified in Section IV.H, Noise, would also be applicable to this alternative. Thus, construction noise impacts would be significant and unavoidable and similar to the Proposed Project.

b. Operation

The operational noise generated under the Commercial Reuse Alternative would be typical of that of residential and commercial land uses and would be consistent with the noise that already exists in the Project Site area. As discussed under the Traffic / Transportation subheading below, the Commercial Reuse Alternative would generate 369 fewer daily trips than the Proposed Project with 41 additional trips during the a.m. peak hour and 31 fewer trips during the p.m. peak hour. Therefore, mobile source operational noise levels under this alternative would be slightly higher than the Proposed Project. Nevertheless, the same operational noise mitigation measure (MM H-6) and code compliance requirements identified in Section IV.H, Noise, would also be applicable to this alternative. Thus, operational noise impacts would be less than significant and would be reduced compared to the Proposed Project.

9. Population, Housing, and Employment

As discussed in Section IV.I, Population, Housing, and Employment, the Proposed Project would be consistent with the Westlake Community Plan and the SCAG 2016-2040 RTP/SCS growth projections. The Commercial Reuse Alternative includes a total of 142 dwelling units, 74,495 square feet of general office space, and 9,810 square feet of ground floor commercial uses on the South Block. Since this alternative would generate fewer residences and housing units than the Proposed Project, this alternative would also be within the Westlake Community Plan and the SCAG 2016-2040 RTP/SCS growth projections and would also result in a less than significant impact. The Commercial Reuse Alternative would generate a higher jobs-to-housing ratio as more employees would be generated by the retention of the commercial land uses on the South Block. Impacts to population, housing, and employment under this alternative would be less than significant and would be reduced compared to the Proposed Project.

10. Public Services

A significant impact would occur if a project were to increase the number of on-site persons beyond the allowable capacity for the Project Site and for the buildings on-site. The Proposed Project was found to have a less than significant impact on fire protection services, schools, and parks. With regards to police protection services, the Proposed Project would implement Mitigation Measures MM J.2-1 through MM J.2-3which would reduce the Project's impacts on police services to a less than significant level..

Similar to the Proposed Project, the Commercial Reuse Alternative would also implement Mitigation Measures MM J.2-1 through MM J.2-3. With the implementation of MM J.2-1 through MM J.2-3, this alternative would result in a less than significant impact to public services. When compared to the Proposed Project, the Commercial Reuse Alternative would have similar impacts on fire protection services and police protection services. With regards to this alternative's demand on parks and schools, the Commercial Reuse Alternative would generate a reduced demand on parks and school facilities in the area due to the reduction of on-site residents.

11. Traffic / Transportation

Similar to the Proposed Project, development of the Commercial Reuse Alternative may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and

Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, similar to the Proposed Project, the Commercial Reuse Alternative would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. This alternative would also be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the Commercial Reuse Alternative would not be expected to result in inadequate emergency access, and similar to the Proposed Project a less than significant impact would occur.

As concluded in Section IV.K, Traffic and Transportation, the addition of Proposed Project traffic would not create a significant impact at any of the ten study intersections, and any increases in critical movement analysis (CMA) would be less than the threshold for a significant impact to occur. As shown in Table V.D-4, below, the Commercial Reuse Alternative would generate approximately 218 net additional average daily trips as compared to the existing conditions with 87 additional a.m. peak hour trips and 22 additional p.m. peak hour trips.[4] This Alternative would generate 369 fewer daily trips, 41 additional a.m. peak hour trips, and 31 fewer p.m. peak hour trips as compared to the Proposed Project.

Table V.D-4
Trip Generation Comparison of the Existing Conditions, Proposed Project, and the Commercial Reuse Alternative

Comparative Scenarios	ADT	AM Peak Hour Trips	PM Peak Hour Trips
Existing Conditions	2,159	160	187
Proposed Project Gross Trips	2,746	206	240
Proposed Project Net Trips	587	46	53
Commercial Reuse Alternative Gross Trips	2,377	247	209
Commercial Reuse Alternative Net Trips	218	87	22

Notes:
ADT = Average Daily Trips
Source: Parker Environmental Consultants.

Since the p.m. peak hour trips would be slightly reduced under this alternative as compared to the Proposed Project, it follows that the alternative's impact to the ten area intersections would be less than significant and the same as compared to the Proposed Project during the p.m. peak hour. For the a.m. peak hour, this alternative would result in 41 additional trips (an approximate 33 percent increase) as compared to the Proposed Project's net a.m. peak hour trips. Under the Future (2019) with Project Conditions, all of the ten study intersections are operating at LOS C or better with the exception of intersection 6 (Bixel Street and 7th). The Proposed Project would increase the CMA value at this intersection by 0.014 during the a.m. peak hour. A 33 percent increase to the Proposed Project's incremental increase at this intersection would yield a total incremental increase of 0.018, resulting in a total CMA value of 0.855. Pursuant to the LADOT's thresholds of significance for determining a significant impact, a significant impact would occur if the Project-related increase in CMA value is equal to or greater than 0.020. Since the incremental Project-related increase in CMA value under this

[4] *For purposes of estimating vehicle trips, the commercial office space under this alternative was assumed to have a 50/50 split between medical office and general office.*

alternative is still below 0.020, the Commercial Reuse Alternative's a.m. peak hour impact would be less than significant and impacts would be the same as compared to the Proposed Project.

12. Utilities and Service Systems

a. Water

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Commercial Reuse Alternative as compared to the Proposed Project and would be less than significant. Under the Proposed Project, the anticipated water demand is expected to result in a net increase of 30,666 gpd or approximately 34 acre feet of water per year. Comparatively, as shown in Table V.D-5, below, the net water demand associated with the Commercial Reuse Alternative is approximately 18,225 gpd or 20 acre feet per year, or roughly 60 percent of the Proposed Project's water demand.

Table V.D-5
Estimated Water Demand by the Commercial Reuse Alternative

Type of Use	Quantity Unit	Water Use (gpd/unit)	Proposed Water Demand (gpd)	(AFY)
Existing Uses				
General Office	27,204 sf	0.18 gpd/sf	4,897	**27**
Medical/Dental Office	58,112 sf	0.3 gpd/sf	17,434	
High-Turnover Restaurant (996 sf)	66 seat [b]	24 gpd/seat	1,584	
		Existing Water Demand:	**23,915**	
Commercial Reuse Alternative				
Residential Units (142 total du)				
Studio	56 du	90 gpd / du	5,040	21
One Bedroom	45 du	132 gpd / du	5,940	
Two Bedroom	30 du	180 gpd / du	5,400	
Three Bedroom	11 du	228 gpd / du	2,508	
		Residential Total:	***18,888***	
Commercial Uses (84,305 total sf) [b]				
General Office	37,247.5	144 gpd / 1,000 sf	5,364	26
Medical Office	37,247.5	300 gpd / 1,000 sf	11,174	
Retail	6,410 sf	60 gpd / 1,000 sf	385	
Restaurant (2,200 sf)	147 seat [c]	36 gpd / seat	5,292	
Coffee Shop	1,200 sf	864 gpd / 1,000 sf	1,037	
		Commercial Subtotal:	***23,252***	
		Total Commercial Reuse Alternative Water Demand:	**42,140**	**47**
		Less Existing Demand:	*-23,915*	*-27*
		Net Additional Water Demand:	**18,225**	**20**

Notes: du: dwelling unit, sf: square feet, gpd: gallons per day; AFY: acre feet per year
All numbers rounded to the nearest gpd or AFY.
[a] Rates provided by LADWP in their correspondence letter dated January 10, 2017. Water consumption is assumed to be 120% of wastewater generation.
[b] For purposes of this analysis this alternative assumes that the total commercial office use would be comprised on 50% general office and 50% medical office, which is comparable to the existing utilization of the site.
[c] Restaurant assumes 15 sf/seat. Source: California Green Building Code, Chapter 10, Table 1004.1.2.
Source: Parker Environmental Consultants.

The 2015 UWMP has evaluated the City's water supply in comparison to the 2012 RTP growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the

region. Similar to the Proposed Project, because this alternative would not exceed the planned growth projections for the existing General Plan and zoning density requirements of the Project Site, the projected demands associated with the Commercial Reuse Alternative can be accommodated by the City's water supply. Therefore, similar to the Proposed Project, this alternative would result in a less than significant impact. Compared to the Proposed Project, water demands would be further reduced under this alternative.

b. Wastewater

Similar to the Proposed Project, the Commercial Reuse Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. With respect to anticipated wastewater generation, the Commercial Reuse Alternative would result in a decrease in wastewater generation. Under the Proposed Project, the anticipated wastewater generation is expected to result in a net increase of 25,555 gpd (see Table IV.L-12 in Section IV.L, Public Utilities). Comparatively, as shown in Table V.D-6, below, the net wastewater generation associated with the Commercial Reuse Alternative is approximately 15,188 gpd, or roughly 59 percent of the Proposed Project's wastewater generation.

Table V.D-6
Estimated Wastewater Generation by the Commercial Reuse Alternative

Type of Use	Size	Wastewater Demand Rate (gpd/unit) [a]	Total Wastewater Demand (gpd)
Existing Uses			
General Office	27,204 sf	0.15 gpd / sf	4,081
Medical/Dental Office	58,112 sf	0.25 gpd / sf	14,528
High-Turnover Restaurant (996 sf)	66 seat [b]	20 gpd / seat	1,320
		Existing Wastewater Generation:	**19,929**
Commercial Reuse Alternative			
Residential Units (369 total du)			
Studio	56 du	75 gpd / du	4,200
One Bedroom	45 du	110 gpd / du	4,950
Two Bedroom	30 du	150 gpd / du	4,500
Three Bedroom	11 du	190 gpd / du	2,090
		Residential Subtotal:	***15,740***
Commercial Uses (84,307 total sf) [b]			
General Office	37,247.5 sf	120 gpd / 1,000 sf	4,470
Medical Office	37,247.5 sf	250 gpd / 1,000 sf	9,312
Retail	6,410 sf	50 gpd / 1,000 sf	321
Restaurant (2,200 sf)	147 seat [c]	30 gpd / seat	4,410
Coffee Shop	1,200 sf	720 gpd / 1,000 sf	864
		Commercial Subtotal:	***19,377***
		Total Commercial Reuse Alternative Wastewater Generation:	**35,117**
		Less Existing Wastewater Generation:	*-19,929*
		NET TOTAL Wastewater Generation:	**15,188**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] Rates provided by LADWP in their correspondence letter dated January 10, 2017.
[b] For purposes of this analysis this alternative assumes that the total commercial office use would be comprised on 50% general office and 50% medical office, which is comparable to the existing utilization of the site.
[c] Restaurant assumes 15 sf/seat. Source: California Green Building Code, Chapter 10, Table 1004.1.2.
Parker Environmental Consultants.

As concluded in Section IV.L-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the Proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. As the projected demands associated with the Commercial Reuse Alternative are less than the Proposed Project, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment. The Commercial Reuse Alternative would result in a less than significant impact with regards to wastewater generation.

c. Energy Conservation

As discussed in Section IV.L-3, Public Utilities, Energy, of the EIR, the estimated net increase in electricity consumption by the Proposed Project would be approximately 1,826,847 kilowatts per year. As shown in Table V.D-7, below, the estimated net increase in electricity consumption by the Commercial Reuse Alternative would be approximately 1,390,927 kilowatts per year, which is roughly 40 percent of the energy demand of the Proposed Project.

Table V.D-7
Estimated Electricity Demand by the Commercial Reuse Alternative

Land Use	Size	Electricity Demand Rate (kWh/unit/year) [a]	Total Electricity Demand (kWh/year)
Existing Uses			
General Office	27,204 sf	12.95 kWh/sf/year	352,292
Medical/Dental Office	58,112 sf	12.95 kWh/sf/year	752,550
High-Turnover Restaurant	996 sf	47.45 kWh/sf/year	47,260
Parking Garage	59,492 sf	4.35 kWh/sf/year	258,790
		Existing Electricity Demand:	**1,410,892**
Commercial Reuse Alternative Uses			
Multi-Family Residential	142 du	5,626.5 kWh/du/year	798,963
General and Medical Office	74,495 sf	12.95 kWh/sf/year	964,710
Retail	6,410 sf	13.55 kWh/sf/year	86,856
Restaurant/Coffee Shop	3,400 sf	47.45 kWh/sf/year	161,330
Parking Garage [b]	181,600 sf	4.35 kWh/sf/year	789,960
		Total Commercial Reuse Alternative Electricity Demand:	**2,801,819**
		Less Existing Electricity Demand:	*-1,410,892*
		NET TOTAL Electricity Demand:	**1,390,927**

Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour
[a] *SCAQMD, CEQA Air Quality Handbook, Table A9-11-A: Electricity Usage Rate. 1993.*
[b] *The total parking GSF was estimated with an assumption of 400 sf per parking space to account for stalls and drive isles within the parking garage.*
Parker Environmental Consultants.

The EIR concluded that the projected increase in electrical demand due to the Proposed Project would not have an adverse impact on energy. Energy supplies are adequate to serve the Project and the installation of needed new infrastructure would not be expected to result in any significant secondary environmental

effects. Similar to the Proposed Project, the Commercial Reuse Alternative would exceed Title 24 energy efficiency requirements and further reduce demand for electricity under the Commercial Reuse Alternative. Because the Commercial Reuse Alternative would demand less energy than the Proposed Project, impacts would have similarly a less than significant impact and further reduced as compared to the Proposed Project.

The EIR concluded the Proposed Project's net natural gas demands are estimated to be approximately 1,350,908 cubic feet (cf) per month, or approximately 16,210,896 cf/year. As shown in Table V.D-8, below, the estimated net increase in natural gas demands by the Commercial Reuse Alternative would be approximately 889,766 cf/month, which is roughly 66 percent of the natural gas demand of the Proposed Project.

Table V.D-8
Estimated Natural Gas Demand by the Commercial Reuse Alternative

Land Use	Size	Natural Gas Demand Rate (cubic feet /unit/month) [a]	Total Natural Gas Demand (cubic feet/month)
Existing Uses			
General Office	27,204 sf	2.0 cf/sf/month	54,408
Medical/Dental Office	58,112 sf	2.0 cf/sf/month	116,224
High-Turnover Restaurant	996 sf	2.9 cf/sf/month	2,888
Parking Garage	59,492 sf	0 cf/sf/month	0
		Existing Natural Gas Demand:	**173,520**
Commercial Reuse Alternative			
Multi-Family Residential	142 du	4,012 cf/du/month	894,676
General and Medical Office	74,495 sf	2.0 cf/sf/month	148,990
Commercial/Retail	9,810 sf	2.0 cf/sf/month	19,620
		Total Commercial Reuse Alternative Natural Gas Demand:	**1,063,286**
		Less Existing Natural Gas Demand:	*-173,520*
		NET TOTAL Natural Gas Demand:	**889,766**

Notes: sf =square feet; du = dwelling unit
[a] *SCAQMD, CEQA Air Quality Handbook, Table A9-12-A: Natural Gas Usage Rate. 1993*
Source: Parker Environmental Consultants.

Similar to the Proposed Project, it is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Commercial Reuse Alternative. Both the Proposed Project and the Commercial Reuse Alternative would require local infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature and thus result in less than significant impacts upon the environment. Therefore, impacts associated with natural gas consumption under this alternative would be less than significant and similar to the Proposed Project, though natural gas demands would be further reduced.

d. Solid Waste

Similar to the Proposed Project, the Commercial Reuse Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. As concluded in the EIR, the Proposed Project's demolition and construction activities are estimated to generate approximately 14,316 tons of debris. Comparatively, as shown in Table V.D-9, below, the Commercial Reuse Alternative would generate 5,470 tons of construction and demolition debris, which equates to roughly 38 percent of the solid waste material generated by the Proposed Project.

Table V.D-9
Estimated Construction and Demolition Debris by the Commercial Reuse Alternative

Construction Activity	Size	Rate [a] (lbs/sf)	Generated Waste (tons)
Demolition			
Parking Garage	59,492 sf	155 lbs/sf	4,611 tons
Total Alternative Demolition Debris Generation:			**4,611 tons**
Construction /Renovation			
Multi-Family Units	132,550 sf	4.38 lbs/sf	290 tons
Commercial/Retail	111,272 sf [c]	3.89 lbs/sf	216 tons
Parking Garage	181,600 sf	3.89 lbs/sf	353 tons
Total Construction/Renovation Debris Generation:			**859 tons**
Net Demolition and Construction/Renovation Debris Total:			**5,470 tons**

Notes: sf = square feet; lbs = pounds
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *Includes 74,495 square feet of general office space and 9,810 square feet of retail space.*
[c] *The total parking GSF was estimated with an assumption of 400 sf per parking space to account for stalls and drive isles within the parking garage.*
Source: Parker Environmental Consultants.

Similar to the Proposed Project, all construction and demolition debris generated by the Commercial Reuse Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion in the EIR regarding the Proposed Project, the amount of solid waste generated during construction of the Commercial Reuse Alternative would fall well within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the Proposed Project and less than significant, though impacts to regional landfill capacity would be further reduced.

Similar to the Proposed Project, operation of the Commercial Reuse Alternative would cause on-going generation of solid waste throughout the lifespan of the Project. As discussed in Section IV.L-4, Public Utilities/Solid Waste, the Proposed Project would generate approximately 4,533 pounds (2.27 tons) of solid waste per day, or approximately 827 tons per year. Comparatively, as shown in Table V.D-10 below, the Commercial Reuse Alternative would generate approximately 3,726 lbs/day of solid waste or approximately 680 tons per year. Operational solid waste under the Commercial Reuse Alternative would be approximately 82 percent of the solid waste generated by the Proposed Project. Compared to the Proposed Project, the Commercial Reuse Alternative would result in reduced operational solid waste

generation. Therefore, similar to the EIR's conclusion for the Proposed Project, solid waste impacts under the Commercial Reuse Alternative would be less than significant upon regional solid waste disposal resources.

Table V.D-10
Estimated Operational Solid Waste Generation by the Commercial Reuse Alternative

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses			
General Office	27,204 sf	0.006 lbs/sf/day	163
Medical/Dental Office	58,112 sf	0.007 lbs/sf/day	407
High-Turnover Restaurant (996 sf)	10 emp [b]	10.53 lbs/emp/day	105
		Existing Solid Waste Generation:	**675**
Proposed Project			
Multi-Family Residential	142 du	12.23 lbs/du/day	1,737
Commercial (84,305 sf)	253 emp [b]	10.53 lbs/employee/day	2,664
		Total Commercial Reuse Alternative Solid Waste Generation:	**4,401**
		Less Existing Uses:	*-675*
		NET TOTAL Solid Waste Generation:	**3,726**

Notes: sf =square feet; du = dwelling units; emp = employee
[c] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[d] *Employee generation based on Section IV.I, Population, Housing, and Employment.*
Source: Parker Environmental Consultants.

A. DESCRIPTION OF THE ALTERNATIVE

The Reduced Density Alternative would result in the development of a mixed-use project, similar to the Proposed Project, but with an approximate 25 percent reduction in total floor area and residential density. Similar to the Proposed Project, the Reduced Density Alternative would include the demolition of the existing structures on-site and the construction of two buildings; a five–story residential building fronting 5th Street and a six-story mixed use residential building with ground floor retail space on W. 6th Street. The Reduced Density Alternative would consist of 277 residential units and 16,500 square feet of ground floor retail use. The North Building would include 103 residential units and the South Building would include 174 residential units with approximately 16,500 square feet of ground floor retail space. The retail space may include retail, restaurant, and coffee shop uses. Similar to the Proposed Project the two buildings would be connected by a footbridge that spans above the adjacent alleyway. A summary of the Proposed Project with the proposed unit mix and floor area for Proposed Project is provided in Table V.E-1, Reduced Density Alternative Development Program, below.

Table V.E-1
Reduced Density Alternative Development Program

Land Uses	Dwelling Units	Floor Area (Square Feet)
Proposed Project:		
North Building		
Residential		
Studio Units	42	84,857 sf
1-Bedroom Units	32	
2-Bedroom Units	21	
3-Bedroom Units	8	
North Building Residential Subtotal	*103 du*	
South Building		
Residential		
Studio Units	101	128,632 sf
1-Bedroom Units	42	
2-Bedroom Units	21	
3-Bedroom Units	10	
South Building Residential Subtotal	*174 du*	
Commercial		
Retail and Restaurant	--	16,500 sf
Retail Subtotal	--	*16,500 sf*
TOTAL	**277 du**	**229,989 sf**

Source: Parker Environmental Consultants.

1. Residential Uses

The Reduced Density Alternative would include up to 277 residential units within two buildings (North Building and South Building). The North Building would include up to 103 residential units, anticipated to include 42 studio units, 32 one-bedroom units, 21 two-bedroom units, and 8 three-bedroom units.

The South Building would include up to 174 residential units, anticipated to include 101 studio units, 42 one-bedroom units, 21 two-bedroom units, and 10 three-bedroom units. In total, the Proposed Project would include approximately 143 studio units, 74 one-bedroom units, 42 two-bedroom units, and 18 three-bedroom units; of varying sizes and configurations. The permitted Density of the South Block is 191 units within the C4 (Regional Center – R5 density) portion of the site and 36 units within the C2 (Community Commercial – R4 density). Consistent with the allowable density within each zone, approximately 27 units would be provided within the C2 Zone and 147 dwelling units would be provided within the C4 Zone.

Similar to the Proposed Project, the Reduced Density Alternative would include residential lobbies, mailroom, residential amenities, and a leasing office. Residential amenities may include but are not limited to: swimming pools, spas, landscaped courtyards, cabana, outdoor seating, clubhouse, fitness center, skydeck, ping pong table, fire pit, barbeque areas, outdoor relaxing areas, outdoor kitchen, and dog wash station.

2. Floor Area

The Project Site's gross lot area is approximately 83,659 square feet. Total allowable floor area ratio (FAR) for the Site is 4.70:1, which allows up to 363,228 square feet of development. The Reduced Density Alternative proposes approximately 229,989 square feet of floor area, which results in a FAR of 3.0:1. A summary of the maximum allowable code floor area and the Reduced Density Alternative's floor area is provided in Table V.E-2, below.

Table V.E-2
Lot Area and Maximum FAR by Zone

Portion of Site	Zone	Lot Area	Buildable Area	Maximum Allowable Floor Area	Proposed Floor Area	Proposed FAR
North Block	R5(CW)-U/6	30,880	24,554	147,322	84,857	3.5
South Block	C4(CW)-U/4.5	38,379	38,379	172,706	113,489	2.96
	C2(CW)-U/3	14,400	14,400	43,200	31,642	2.19
Subtotal South Block		52,779	52,779	215,906	145,132	2.75
TOTAL SITE		**83,659**	**77,333**	**363,228**	**229,989**	**3.0**

Source: Parker Environmental Consultants.

3. Architectural Features

For purposes of the Reduced Density Alternative, it is assumed that the proposed residential and mixed-use structures would be developed within the same general building footprint as proposed under the Proposed Project, but would include reduced building heights. As compared to the Proposed Project, the North Building would be reduced by two floors and would include five levels of residential above grade and two levels of subterranean parking. The South Building would be reduced by one level and would include six levels above grade and one and one-half levels below grade.

4. Parking and Access

Parking and access for the Reduced Density Alternative would be similar to the Proposed Project, but the number of parking stalls would be reduced to correspond to the reduction in parking demand. Parking would be provided on-site via multi-level structures located under the two proposed buildings, with three access points provided. Parking within the South Building would be provided within two levels of subterranean parking and partially at-grade. Vehicular access to the South Building would be provided via one ingress/egress driveway on 6th Street and one ingress/egress driveway on the adjacent alleyway. Parking within the North Building would be provided in one level of subterranean parking and one level partially at-grade. Vehicular access to the North Building would be provided via one ingress/egress driveway from the alley. On-site parking would serve both residential and retail uses. Retail parking would be provided in the South Building and accessed through the 6th Street vehicular driveway. Residential parking for both buildings would be accessed through the driveways along the alleyway. As part of the Proposed Project, this alley would be converted to one-way westbound operation.

As summarized in Table V.E-3, and discussed in further detail below, the Reduced Density Alternative would be consistent with the applicable parking requirements of the LAMC. The Reduced Density Alternative would require and provide a total of 279 parking spaces with 253 residential spaces and 26 retail spaces, which includes a parking reduction allowed under LAMC 12.21.A.4. Pursuant to LAMC 12.21.A.4, the Proposed Project seeks a 10 percent reduction in the number of residential stalls required and a 20 percent reduction in the number of commercial stalls required. The total number of spaces provided is consistent with what would be required with these reductions.

The Reduced Density Alternative would provide 329 bicycle parking spaces, including 286 long-term and 43 short-term term bicycle parking spaces for the residential units and commercial space, based upon the provisions of Ordinance 182,386 (effective March 13, 2013) (See LAMC Section 12.21 A.4).

Table V.E-3
Summary of Required and Proposed Parking Spaces for the Reduced Density Alternative

Description	Quantity	Parking Required by Code [a]		Parking Provided
		Rate	Spaces	
North Building				
Residential				
Less than three habitable rooms	74	1.00 stall/du	74	94
Three habitable rooms	21	1.00 stall/du	21	
More than three habitable rooms	8	1.25 stall/du	10	
		10% Reduction [b]	*-11*	
		Subtotal Residential	***94***	
South Building				
Residential				
Less than three habitable rooms	143	1.00 stall/du	143	***159***
Three habitable rooms	21	1.00 stall/du	21	
More than three habitable rooms	10	1.25 stall/du	13	
		10% Reduction [b]	*-18*	
		Subtotal Residential	***159***	
Commercial				
Retail	16,500 sf	2 stalls / 1,000 sf	33	26
		20% Reduction [b]	*-7*	
		Subtotal Retail	***26***	
		TOTAL	**279**	**279**

Notes:
du = dwelling unit, sf = square feet
[a] *LAMC 12.21.A.4(p)*
[b] *Bicycle Parking Ordinance (No. 182,386), March 13, 2013.*
Source: Parker Environmental Consultants, January 2016.

5. Open Space and Landscaping

Similar to the Proposed Project, open space courtyards and landscaping features would be provided throughout the Reduced Density Alternative. Amenities proposed within the common open space areas within the North Building and South Building include swimming pools, spas, landscaped courtyards, cabana, outdoor seating, clubhouse, fitness center, skydeck, ping pong table, fire pit, barbeque areas, outdoor relaxing areas, outdoor kitchen, and dog wash station. Similar to the Proposed Project this Alternative's landscape palate for the North Building and South Building would feature ornamental plants and drought-tolerant species.

The open space requirements and amount of open space proposed for the Reduced Density Alternative are summarized in Table V.E-4, Summary of Required and Proposed Open Space Areas for the Reduced Density Alternative, below. As shown in Table V.E-4, the Reduced Density Alternative would include 11,425 square feet of open space within the North Building and 18,675 square feet of open space in the South Building. Similar to the Proposed Project the three existing street trees along 5th Street would be removed and replaced in consultation with the City of Los Angeles Division of Urban Forestry and approved by the Department of Public Works.

Table V.E-4
Summary of Required and Proposed Open Space Areas for the Reduced Density Alternative

LAMC Open Space Requirements [a]	Dwelling Units		Open Space Required (square feet)	
	North Block	South Block	North Block	South Block
Less than three habitable rooms (100 sf/du)	74	143	7,400	14,300
Three habitable rooms (125 sf/du)	21	21	2,625	2,625
More than three habitable rooms (175 sf/du)	8	10	1,400	1,750
Total Required	**103**	**174**	**11,425**	**18,675**
Proposed Open Space			**Open Space Proposed (square feet)**	
Common Open Space	--	--	9,550	16,775
Private Open Space [b]	--	--	1,875	1,900
Total Proposed	**103**	**174**	**11,425**	**18,675**

Notes:
[a] *LAMC 12.21.G and Central City West Specific Plan*
[b] *Per the Central City West Specific Plan, 50 sf/unit may be counted towards required open space if 150 sf/unit is provided on at least 50% of units.*
Source: Parker Environmental Consultants, 2016.

6. Entitlement Requests

Discretionary entitlements, reviews, and approvals required for implementation of the Reduced Density Alternative would include, but may not be limited to:

1. Pursuant to Los Angeles Municipal Code ("LAMC") Section 11.5.7-C, a Project Permit Compliance Approval of the Central City West Specific Plan ("CCWSP").
2. Pursuant to LAMC Section 11.5.7-F, the Applicant requests the following Specific Plan Exceptions of the Central City West Specific Plan:
    a. To allow a (0) zero-foot front yard setback for the North Building, in lieu of the 15 ft.; as required by the CCWSP, Section 6.F-2,

    b. To allow (0) zero-foot side yard setbacks for the east and west property lines for the North Building, in lieu of the 10 ft. required by the CCWSP, Section 6.F-2,

    c. To allow a (0) zero-foot rear yard setback in lieu of the 19 ft. for the South Building; as required by CCWSP Section 6.F-6.

    d. To deviate from the street standards of 5th Street, as required by the CCWSP Appendix C.1.K to be consistent with the newly adopted Mobility Plan.

Pursuant to various sections of the LAMC the Applicant will request approvals and permits from the Department of Building and Safety (and other municipal agencies) for Project construction activities including, but not limited to, the following: excavation, shoring, grading, foundation, haul route, removal

of existing street trees, building and tenant improvements. Other approvals (as needed), ministerial or otherwise, may be necessary, as the City finds appropriate in order to execute and implement the Proposed Project.

B. ENVIRONMENTAL ANALYSIS

1. Aesthetics

The Project Site is located in a Transit Priority Area. Similar to the Proposed Project, Reduced Density Alternative's aesthetic impacts shall not be considered significant impacts on the environment pursuant to Public Resources Code Section 21099.

Aesthetic impacts under the Reduced Density Alternative would be nearly identical to the Proposed Project with the exception of slightly lower building heights. The North Building would be reduced by two levels and would stand five levels above grade and the South Building would be reduced by one level and would stand six levels above grade. Similar to the Proposed Project, parking for both buildings would be concealed interior to the proposed buildings. Further the Reduced Density Alternative would adhere to the same code compliance measures to ensure the upkeep and aesthetic quality of the Project Site. As required by the CCWSP's Urban Design Guidelines, all open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with the LAMC. Additionally, every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair, and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104. With regards to views, the Reduced Density Alternative would result in a less than significant impact. From an aesthetic and urban massing standpoint, the Reduced Density Alternative would have a similar impact when compared to the Proposed Project.

Light and glare impacts under the Reduced Density Alternative would be the same as identified under the Proposed Project. Similar to the Proposed Project, the Reduced Density Alternative shall comply with Section 99.05.106.8, Light Pollution Reduction, of the City of Los Angeles Green Building Code (Ord. 182849) to ensure that lighting impacts would be reduced. With regards to nighttime lighting and daytime glare, the Reduced Density Alternative would result in a less than significant impact.

2. Air Quality

b. Construction

A significant impact would occur if a project would considerably increase the release of criteria pollutants for which the project region is in non-attainment; if a project would conflict with applicable air quality plans or violate any air quality standards; or if a project were to create objectionable odors affecting a substantial number of people. The Reduced Density Alternative would generate less construction emissions compared to the Proposed Project, since this alternative would include a 25 percent reduction to the overall building area. Further, the duration of the construction period under this alternative is expected

to be reduced commensurate with the reduction in building volume. Similar to the Proposed Project, this alternative would be required to comply with applicable SCAQMD rules and regulations for new or modified sources, such as SCAQMD Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings), which are further discussed in Section IV.B, Air Quality. Similar to the Proposed Project, the Reduced Density Alternative would result in a less than significant impact, but impacts would be further reduced by approximately 25 percent. However, due to the typical construction activity on any given day, it is anticipated that the daily emissions associated with the Reduced Density Alternative would be the same as under the Proposed Project. Impacts under the Reduced Density Alternative would be similar to the Proposed Project and less than significant.

c. Operation

Operational air pollutant emissions would are generated at the Project Site by stationary sources, such as space and water heating, architectural coatings (paint), consumer products and mobile vehicle traffic traveling to and from the Project Site. The increase in tenants and guests on-site would increase air pollution emissions from stationary sources and mobile sources and contribute to increased emissions compared to the existing operations on-site, which include partially vacant commercial uses.

The Proposed Project would include a total of 369 dwelling units, which includes 142 dwelling units on the North Block and 227 dwelling units on the South Block, and 22,000 square feet of ground floor commercial uses on the South Block. By comparison, the Reduced Density Alternative includes a total of 277 dwelling units, which includes 103 dwelling units on the North Block and 174 dwelling units on the South Block, and 16,500 square feet of ground floor commercial uses on the South Block. As discussed in further detail below under the traffic impacts discussion, the Reduced Density Alternative would generate 686 fewer daily trips than the Proposed Project. As such, this alternative's mobile source emissions would be reduced as compared to the Proposed Project. The traffic volumes and associated mobile source emissions under this alternative would be below the existing conditions. Similar to the Project, the Reduced Density Alternative would not violate any air quality standards and would be required to implement all required SCAQMD rules and regulations. Compared to the Proposed Project, the Reduced Density Alternative would have similarly a less than significant impact, and would further reduced air quality impacts.

3. Cultural Resources

a. Historic Resources

The two commercial office and medical office buildings on-site, located at 1111 W. 6th Street and 1125 W. 6th Street, were determined to be historic resources. Under the Reduced Density Alternative, both buildings on the South Block would be demolished to allow for the construction of the new residential buildings. Therefore, the Reduced Density Alternative would have a similar conclusion as compared to the Proposed Project, and would result in a significant adverse impact associated with the demolition of a historic resource.

b. Archeological Resources

No known archaeological resources are known to occur within the Project Site. Under the Proposed Project, earthwork and excavation would occur on the North and South Blocks which would have the potential to uncover unknown archaeological resources. Potential impacts upon unknown archaeological resources under the Proposed Project would be reduced to less than significant levels with adherence to applicable laws and regulations governing the protection of archaeological resources. Grading under the Reduced Density Alternative would have similar potential for discovery on the North and South Blocks as both the Project and this alternative would require excavation on both sites. Similar to the Proposed Project, potential impacts upon archaeological resources would be less than significant, and the same as compared to the Proposed Project.

c. Paleontological Resources

No known paleontological resources are known to occur within the Project Site. Under the Proposed Project, earthwork and excavation would occur on the North and South Blocks which would have the potential to uncover unknown paleontological resources. Potential impacts upon paleontological resources under the Proposed Project would be reduced to less than significant levels with adherence to applicable laws and regulations governing the protection of paleontological resources. Grading under the Reduced Density Alternative would have similar potential for resource discovery as grading and excavation would occur on the North and South Blocks. Potential impacts upon paleontological resources would be similar to the Proposed Project and less than significant under the Reduced Density Alternative.

4. Geology and Soils

A significant impact may occur if a project would place a new structure or building in an area that is susceptible to geological hazards or unstable soils. As discussed in the Geotechnical Investigation for the Project Site, seismic hazards relating to surface rupture, liquefaction, lateral spreading, landsliding, subsidence, and collapse are considered low risk issues on the Project Site. The primary seismic hazard for the Project Site is the potential for strong ground motion. The Project Site is susceptible to ground motion and shaking as a result of potential movement along faults in the region. The Project is located in a seismically active region, as is all of Southern California. These geologic hazards are common and ubiquitous throughout Southern California. The Reduced Density Alternative would be designed and constructed in conformance with the most recently adopted California Building Code and Los Angeles Building Code design parameters, which are specifically tailored to minimize the risk of structure failure due to seismic hazards. Further, the design and construction of the Reduced Density Alternative would be subject to the review and approval of the Department of Building and Safety. The Reduced Density Alternative would be required to comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter and Project's Geotechnical Report and the requirements outlined in the latest edition of the City of Los Angeles Uniform Building Code, including all applicable provisions of Chapter IX, Division 70 of the LAMC, as discussed in Section IV.D, Geology and Soils. This alternative would have a less than significant impact with respect to seismic hazards.

When compared to the Proposed Project, the Reduced Density Alternative would have similar and essentially equivalent impacts upon potential seismic hazards.

Similar to the Proposed Project, the Reduced Density Alternative's construction impacts on soil erosion, sedimentation, and groundwater dewatering would be less than significant with compliance to the requirements outlined in the Chapter IX, Division 70 of the City's Uniform Building Code; the LID Ordinance 181,809; and the Standard Urban Stormwater Mitigation Plan (SUSMP), as stated in Section IV.D, Geology and Soils. The Reduced Density Alternative would be required to implement the soil erosion control measures and LID Ordinance to control soil erosion and sedimentation. Further, any dewatering activities would comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. Similar to the Proposed Project, the Reduced Density Alternative would result in a less than significant impact related to erosion and dewatering impacts.

5. Greenhouse Gas Emissions

a. Construction

The Reduced Density Alternative would generate less greenhouse gas emissions during construction compared to the Proposed Project, since this alternative includes a 25 percent reduction in the overall gross building area. Further, the duration of the construction period under this alternative is expected to be reduced commensurate with the reduction in building volume. The Reduced Density Alternative would result in a less than significant impact and construction impacts would be the same as compared to the less than significant impacts under the Proposed Project.

b. Operation

Similar to the Proposed Project, operation of the Reduced Density Alternative would generate air pollution emissions from stationary sources and mobile sources and contribute to increased greenhouse gas emissions compared to the existing operations on-site, which include partially vacant commercial uses. The Proposed Project would include a total of 369 dwelling units, which includes 142 dwelling units on the North Block and 227 dwelling units on the South Block, and 22,000 square feet of ground floor commercial uses on the South Block. By comparison, the Reduced Density Alternative includes a total of 277 dwelling units, which includes 103 dwelling units on the North Block and 174 dwelling units on the South block, and 16,500 square feet of ground floor commercial uses on the South Block. A total of 277 dwelling units would be developed in lieu of the Proposed Project's 369 dwelling units. The Reduced Density Alternative would comply with the same energy efficiency requirements of the L.A. Green Building Code, as applicable for a commercial reuse project. Further, the Reduced Density Alternative would implement Mitigation Measure E-1, which require 20 percent of parking spaces on-site to be able to support electric vehicle supply equipment. On-site operations would be required to comply with applicable local, state, and federal regulations governing energy efficiency. The Reduced Density Alternative would result in a less than significant impact with respect to GHG emissions. Compared to the

Proposed Project, the Reduced Density Alternative would have reduced impacts relating to greenhouse gas emissions.

With respect to operational GHG emissions associated with mobile sources, the Reduced Density Alternative would result in 686 fewer average daily trips as compared to the Proposed Project. Thus, the operational GHG emissions associated with vehicles traveling to and from the Project Site during the operation of the Reduced Density Alternative would be reduced, as compared to the Proposed Project. The Reduced Density Alternative would similarly result in a less than significant impact.

6. Hazardous Materials and Risk of Upset

A significant impact may occur if a project produces a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials; if a project would upset and accidently release hazardous materials into the environment; if a project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; or if a project is located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

As described above, the Project Site is identified on the following databases: HAZNET, CHMIRS, EDR Historic Auto Station and EDR Historic Cleaners. The Good Samaritan Hospital, located to the southwest of the Project Site was identified as a Leaking Underground Storage Tank (LUST) and EDR Historic Auto Station site, and the adjacent property to the southeast was identified as a UST, CA FID UST, HIST UST, and SWEEPS UST site in the regulatory database report. No current or historical recognized environmental conditions were identified on-site. Although, environmental issues were identified regarding the historical uses of the Project Site, which included dry cleaning facilities and automotive repair operations that may have impacted the soil and groundwater with petroleum hydrocarbons and VOCs. Subsurface petroleum hydrocarbons and fuel-related VOC contaminants at the Project Site have been identified in two distinctly different distributions in the subsurface of the Project Site and are likely resultant of two (or potentially more) different sources.

Demolition and soil disturbance impacts would be similar under the Reduced Density Alternative as compared to the Proposed Project. The Applicant would be required to provide letters to the Department of Building and Safety indicating that no Asbestos-Containing Materials or lead-based paint are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations. Additionally, should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations. Similar mitigation measures as discussed in Section IV.F, Hazardous Materials and Risk of Upset, pertaining to communication and coordination with the LAUSD with respect to construction activities and ensuring safe pedestrian routes to schools during construction would also apply to the Reduced Density Alternative. With the implementation of identified mitigation measures, the Reduced Density Alternative would have a less

than significant impact with respect to the hazardous materials. When compared to the Proposed Project, this Alternative would have similar and essentially equivalent impacts upon hazards and risk of upset.

7. Land Use and Planning

Similar to the Proposed Project, the Reduced Density Alternative would require a Project Permit Compliance Approval of the Central City West Specific Plan and Specific Plan exceptions regarding setbacks for the North Building front yards and side yards and deviation from the street standards for 5th Street. The Reduced Density Alternative would eliminate the need for a Specific Plan Exception of the Central City West Specific Plan for rear yard setbacks for the North Building and South Building. The Reduced Density Alternative would also eliminate the need for a Specific Plan Project Permit Adjustment and Director's Decision to allow a 10% increase in qualifying area of interior open space. With approval of the requests, the Reduced Density Alternative would be in conformance with applicable provisions of the LAMC, General Plan, and Central City West Specific Plan. Land use impacts would be less than significant under this alternative. This alternative would generate similar less than significant land use impacts as compared to the Proposed Project.

8. Noise

a. Construction

Construction noise under the Reduced Density Alternative would be reduced with respect to the level of noise generated, since this alternative would require less construction activity due to the 25 percent reduction in the size of the Project. While the day-to-day noise levels during active construction periods would be the same, the overall duration of construction is anticipated to be reduced. The same construction noise mitigation measures and code compliance requirements identified in Section IV.H, Noise, would also be applicable to this alternative. Thus, construction noise and vibration impacts would be significant and unavoidable and similar to the Proposed Project.

b. Operation

The operational noise generated under the Reduced Density Alternative would be typical of residential and commercial land uses and would be consistent with the noise that already exists in the Project Site area. As discussed above, the Reduced Density Alternative would generate fewer average daily trips than the Proposed Project. Therefore, operational noise levels under this alternative would be lower than the Proposed Project. Nevertheless, the same operational noise mitigation measure (MM H-6) and code compliance requirements identified in Section IV.H, Noise, would also be applicable to this alternative. Thus, operational noise impacts would be less than significant and would be reduced compared to the Proposed Project.

9. Population, Housing, and Employment

As discussed in Section IV.I, Population, Housing, and Employment, the Proposed Project would be consistent with the Westlake Community Plan and the SCAG 2016-2040 RTP/SCS growth projections. The Reduced Density Alternative includes a total of 277 dwelling units, which is 92 dwelling units less than the Proposed Project's 369 dwelling units. Therefore, the Reduced Density Alternative would also be consistent with the Westlake Community Plan and the SCAG 2016-2040 RTP/SCS growth projections. Impacts to population, housing, and employment under this alternative would be less than significant and would be reduced compared to the Proposed Project.

10. Public Services

A significant impact would occur if a project were to increase the number of on-site persons beyond the allowable capacity for the Project Site and for the buildings on-site. The Proposed Project was found to have a less than significant impact on fire protection services, schools, and parks. With regards to police protection services, the Proposed Project would implement Mitigation Measures MM J.2-1 through MM J.2-3, which would reduce Project impacts on police services to a less than significant level.

It is anticipated that this alternative would create similar but slightly reduced demands on fire protection services andpolice protection services, and reduced demand upon schools and parks with the reduction of on-site residents. Similar to the Proposed Project, the Reduced Density Alternative would also implement Mitigation Measures MM J.2-1 through MM J.2-3. With the implementation of MM J.2-1 through MM J.2-3, this alternative would result in a less than significant impact to public services. When compared to the Proposed Project, the Reduced Density Alternative would have a similarly less than significant impacts on fire protection services, police protection services, parks and schools.

11. Traffic / Transportation

Similar to the Proposed Project, development of the Reduced Density Alternative may require temporary and/or partial street closures due to construction activities. However, any such closures would be temporary in nature and would be coordinated with the Departments of Transportation, Building and Safety, and Public Works. Nonetheless, while such closures may cause temporary inconvenience, they would not be expected to substantially interfere with emergency response or evacuation plans. Therefore, similar to the Proposed Project, the Reduced Density Alternative would not cause permanent alterations to vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way. This alternative would also be subject to the site plan review requirements of the LAFD and the LAPD to ensure that all access roads, driveways and parking areas would remain accessible to emergency service vehicles. Therefore, the Reduced Density Alternative would not be expected to result in inadequate emergency access, and similar to the Proposed Project, a less than significant impact would occur.

As concluded in Section IV.K, Traffic / Transportation, the addition of Proposed Project traffic would not create a significant impact at any of the ten study intersections, and any increases in critical movement analysis (CMA) would be less than the threshold for a significant impact to occur. As shown in Table V.E-5, below, the Reduced Density Alternative would generate 686 fewer daily trips, 51 fewer a.m. peak

Table V.E-5
Trip Generation Comparison of the Existing Conditions, Proposed Project, and the Reduced Denisty Alternative

Comparative Scenarios	ADT	AM Peak Hour Trips	PM Peak Hour Trips
Existing Conditions	2,159	160	187
Proposed Project	2,746	206	240
Reduced Density Alternative	2,060	155	180

Notes:
ADT = Average Daily Trips
Source: Parker Environmental Consultants.

hour trips, and 60 fewer p.m. peak hour trips as compared to the Proposed Project. As such, the traffic impacts under this alternative would be similar to the Proposed Project in that all ten intersections would experience less than significant impacts. Compared to the Proposed Project, the Reduced Density Alternative would create reduced impacts to traffic and transportation.

12. Utilities and Service Systems

a. Water

Impacts associated with local water conveyance and infrastructure upgrades are anticipated to be similar under the Reduced Density Alternative as compared to the Proposed Project and would be less than significant. Under the Proposed Project, the anticipated water demand is expected to result in a net increase of 30,666 gallons per day or approximately 34 acre feet of water per year. Comparatively, as shown in Table V.E-6, below, the net water demand associated with the Reduced Density Alternative would be approximately 17,502 gpd or 19 acre feet per year, which is roughly 57 percent of the Proposed Project's water demand. The 2015 UWMP has evaluated the City's water supply in comparison to the 2012 RTP growth projections and has determined that the City has adequate capacity to serve the anticipated growth in the region. Similar to the Proposed Project, because this project would not exceed the planned growth projections for the existing General Plan and zoning density requirements of the Project Site, the projected demands associated with this alternative can be accommodated by the City's water supply. Therefore, similar to the Proposed Project, the Reduced Density Alternative would result in less than significant impacts. Compared to the Proposed Project, future water demands would be further reduced under this alternative.

Table V.E-6
Estimated Water Demand by the Reduced Density Alternative

Type of Use	Quantity Unit	Water Use (gpd/unit)	Proposed Water Demand (gpd)	(AFY)
Existing Uses				
General Office	27,204 sf	0.18 gpd / sf	4,897	27
Medical/Dental Office	58,112 sf	0.3 gpd / sf	17,434	
High-Turnover Restaurant (996 sf)	66 seat [b]	24 gpd / seat	1,584	
		Existing Water Demand:	**23,915**	
Proposed Uses				
Residential Units (277 total du)				
Studio	143 du	90 gpd / du	12,870	38
One Bedroom	74 du	132 gpd / du	9,768	
Two Bedroom	42 du	180 gpd / du	7,560	
Three Bedroom	18 du	228 gpd / du	4,104	
		Residential Total:	***34,302***	
Commercial Uses (16,500 total sf)				
Retail	13,100 sf	60 gpd / 1,000 sf	786	8
Restaurant (2,200 sf)	147 seat [b]	36 gpd / seat	5,292	
Coffee Shop	1,200 sf	864 gpd / 1,000 sf	1,037	
		Commercial Subtotal:	***7,115***	
		Total Reduced Density Alternative Water Demand:	**41,417**	**46**
		Less Existing Demand:	*-23,915*	*-27*
		Net Additional Water Demand:	**17,502**	**19**

Notes: du: dwelling unit, sf: square feet, gpd: gallons per day; AFY: acre feet per year
All numbers rounded to the nearest gpd or AFY.
[c] *Rates provided by LADWP in their correspondence letter dated January 10, 2017. Water consumption is assumed to be 120% of wastewater generation.*
[d] *Restaurant assumes 15 sf/seat. Source: California Green Building Code, Chapter 10, Table 1004.1.2*
Parker Environmental Consultants.

b. Wastewater

Similar to the Proposed Project, the Reduced Density Alternative would result in a less than significant impact upon regional wastewater treatment capacity and local conveyance infrastructure. With respect to anticipated wastewater generation, the Reduced Density Alternative would result in a decrease in wastewater generation. Under the Proposed Project, the anticipated wastewater generation is expected to result in a net increase of 25,555 gpd. Comparatively, as shown in Table V.E-7, below, the net wastewater generation associated with the Reduced Density Alternative would be approximately 14,585 gpd, or roughly 57 percent of the Proposed Project's wastewater generation. As concluded in Section IV.L-2, Wastewater, the existing local wastewater infrastructure would be expected to adequately serve the

Table V.E-7
Estimated Wastewater Generation by the Reduced Density Alternative

Type of Use	Size	Wastewater Demand Rate (gpd/unit) [a]	Total Wastewater Demand (gpd)
Existing Uses			
General Office	27,204 sf	.015 gpd / 1,000 sf	4,081
Medical/Dental Office	58,112 sf	0.25 gpd / 1,000 sf	14,528
High-Turnover Restaurant (996 sf)	66 seat [b]	20 gpd / seat	1,320
		Existing Wastewater Generation:	**19,929**
Reduced Density Alternative Uses			
Residential Units (277 total du)			
Studio	143 du	75 gpd / du	10,725
One Bedroom	74 du	110 gpd / du	8,140
Two Bedroom	42 du	150 gpd / du	6,300
Three Bedroom	18 du	190 gpd / du	3,420
		Residential Subtotal:	***28,585***
Commercial Uses (16,500 total sf)			
Retail	13,100 sf	50 gpd / 1,000 sf	655
Restaurant (2,200 sf)	147 seat [b]	30 gpd / seat	4,410
Coffee Shop	1,200 sf	720 gpd / 1,000 sf	864
		Commercial Subtotal:	***5,929***
		Total Reduced Density Wastewater Generation:	**34,514**
		Less Existing Wastewater Generation:	*-19,929*
		NET TOTAL Wastewater Generation:	**14,585**

Notes: sf =square feet; du = dwelling units, gpd: gallons per day
[a] *Rates provided by LADWP in their correspondence letter dated January 10, 2017.*
[b] *Restaurant assumes 15 sf/seat. Source: California Green Building Code, Chapter 10, Table 1004.1.2.*
Parker Environmental Consultants.

Proposed Project and the anticipated wastewater flows would be less than significant and within the treatment capacity of the Hyperion Water Reclamation Plant. As the projected demands associated with the Reduced Density Alternative are less than the Proposed Project, the same conclusion can be reached that this alternative can be adequately accommodated by the City's wastewater infrastructure and treatment facilities without any significant impact to the environment. The Reduced Density Alternative would result in a less than significant impact with regards to wastewater generation.

c. Energy Conservation

As discussed in Section IV.L-3, Public Utilities, Energy, of the EIR, the estimated net increase in electricity consumption by the Proposed Project would be approximately 1,826,847 kilowatt hours per year (kWh/year). As shown in Table V.E-8, below, the estimated net increase in electricity consumption by the Reduced Density Alternative would be approximately 1,942,466 kWh/year, which is roughly 115,619 kWh/year more in energy demand than the Proposed Project.

Table V.E-8
Estimated Electricity Demand by the Reduced Density Alternative

Land Use	Size	Electricity Demand Rate (kWh/unit/year) [a]	Total Electricity Demand (kWh/year)
Existing Uses			
General Office	27,204 sf	12.95 kWh/sf/year	352,292
Medical/Dental Office	58,112 sf	12.95 kWh/sf/year	752,550
High-Turnover Restaurant	996 sf	47.45 kWh/sf/year	47,260
Parking Garage	59,492 sf	4.35 kWh/sf/year	258,790
		Existing Electricity Demand:	**1,410,892**
Reduced Density Alternative Uses			
Multi-Family Residential	277 du	5,626.5 kWh/du/year	1,558,541
Retail	13,100 sf	13.55 kWh/sf/year	177,505
Restaurant/Coffee Shop	3,400 sf	47.45 kWh/sf/year	161,330
Parking Garage	138,663 sf	10.5 kWh/sf/year	1,455,962
		Total Reduced Density Alternative Electricity Demand:	**3,353,338**
		Less Existing Electricity Demand:	*-1,410,892*
		NET TOTAL Electricity Demand:	**1,942,466**

Notes: sf =square feet; du = dwelling unit; kWh = kilowatt-hour
[c] *SCAQMD, CEQA Air Quality Handbook, Table A9-11-A: Electricity Usage Rate. 1993.*
Parker Environmental Consultants.

The projected increase in electrical demand due to the Proposed Project would not have an adverse impact on its electrical system. Energy supplies are adequate to serve the Proposed Project and the installation of needed new infrastructure would not be expected to result in any significant secondary environmental effects. Similar to the Proposed Project, the Reduced Density Alternative would exceed Title 24 energy efficiency requirements and further reduce demand for electricity under the Reduced Density Alternative. Because the Reduced Density Alternative would demand less energy than the Proposed Project, impacts would be similarly less than significant and further reduced as compared to the Proposed Project.

The Proposed Project's net natural gas demands are estimated to be approximately 1,350,908 cubic feet (cf) per month, or approximately 16,210,896 cf/year. As shown in Table V.E-9, below, the estimated net increase in natural gas demands by the Reduced Density Alternative would be approximately 970,804 cf/month, which is roughly 72 percent of the natural gas demand of the Proposed Project.

Table V.E-9
Estimated Natural Gas Demand by the Reduced Density Alternative

Land Use	Size	Natural Gas Demand Rate (cubic feet /unit/month) [a]	Total Natural Gas Demand (cubic feet/month)
Existing Uses			
General Office	27,204 sf	2.0 cf/sf/month	54,408
Medical/Dental Office	58,112 sf	2.0 cf/sf/month	116,224
High-Turnover Restaurant	996 sf	2.9 cf/sf/month	2,888
Parking Garage	59,492 sf	0 cf/sf/month	0
		Existing Natural Gas Demand:	**173,520**
Reduced Density Alternative			
Multi-Family Residential	277 du	4,012 cf/du/month	1,111,324
Commercial/Retail	16,500 sf	2.0 cf/sf/month	33,000
		Total Reduced Density Alternative Natural Gas Demand:	**1,144,324**
		Less Existing Natural Gas Demand:	*-173,520*
		NET TOTAL Natural Gas Demand:	**970,804**

Notes: sf =square feet; du = dwelling unit
[a] *SCAQMD, CEQA Air Quality Handbook, Table A9-12-A: Natural Gas Usage Rate. 1993*
Source: Parker Environmental Consultants.

Similar to the Proposed Project, it is not anticipated that any new electricity or natural gas distribution infrastructure or facilities would be constructed or expanded as a result of the Reduced Density Alternative. Both the Proposed Project and the Reduced Density Alternative would require local infrastructure improvements to connect to the existing infrastructure serving the Project area. However, impacts associated with utility upgrades or additional connections would be temporary in nature, and thus would result in less than significant impacts upon the environment. Therefore, impacts associated with electricity and natural gas consumption under this alternative would be less than significant and similar to the Proposed Project; although, electricity demands would increase by approximately 115,619 kWh/year compared to the Proposed Project and natural gas demands would be reduced compared to the Proposed Project.

d. Solid Waste

Similar to the Proposed Project, the Reduced Density Alternative would comply with all federal, state and local statutes and regulations related to solid waste and impacts would be less than significant. The Proposed Project's demolition and construction activities are estimated to generate approximately 14,316 tons of debris. Comparatively, as shown in Table V.E-10, below, the Reduced Density Alternative would generate 14,041 tons of construction and demolition debris, which equates to roughly 2 percent decrease in the solid waste material as compared to the Proposed Project.

Table V.E-10
Estimated Construction and Demolition Debris by the Reduced Density Alternative

Construction Activity	Size	Rate [a] (lbs/sf)	Generated Waste (tons)
Demolition			
Commercial/Medical Offices	111,272 sf	155 lbs/sf	8,624 tons
Parking Garage	59,492 sf	155 lbs/sf	4,611 tons
		Total Project Demolition Debris Generation:	**13,235 tons**
Construction			
Multi-Family Units	229,989 sf [b]	4.38 lbs/sf	504 tons
Commercial/Retail	16,500 sf [c]	3.89 lbs/sf	32 tons
Parking Garage	138,663 sf	3.89 lbs/sf	270 tons
		Total Construction Debris Generation:	**806 tons**
		Net Demolition and Construction Debris Total:	**14,041 tons**

Notes: sf = square feet; lbs = pounds
[a] *USEPA Report No EPA530-98-010, Characterization of Building Related Construction and Demolition Debris in the United States, July 1998.*
[b] *Includes 229,989 square feet of new residential floor area on the North and South Blocks.*
[c] *Includes 16,500 square feet of commercial retail space.*

Source: Parker Environmental Consultants.

Similar to the Proposed Project, all construction and demolition debris generated by the Reduced Density Alternative would be delivered to a Certified Construction and Demolition Waste Processing Facility. Similar to the conclusion regarding the Proposed Project, the amount of solid waste generated during construction of the Reduced Density Alternative would fall well within the available permitted daily intake capacity of area landfills and recycling centers. Therefore, impacts associated with demolition and construction debris would be similar to the Proposed Project and less than significant.

Similar to the Proposed Project, operation of the Reduced Density Alternative would cause on-going generation of solid waste throughout the lifespan of the Project. As discussed in Section IV.L-4, Public Utilities/Solid Waste, the Proposed Project would generate approximately 4,533 pounds (2.27 tons) of solid waste per day, or approximately 827 tons per year. Comparatively, as shown in Table V.E-11 below, the Reduced Density Alternative would generate approximately 3,240 lbs/day of solid waste or approximately 591 tons per year. Operational solid waste under the Reduced Density Alternative would be approximately 71 percent of the solid waste generated by the Proposed Project. Therefore, similar to the EIR's conclusion for the Proposed Project, solid waste impacts under the Reduced Density Alternative would be less than significant upon regional solid waste disposal resources. Compared to the Proposed Project, the operational solid waste impacts would be reduced under the Reduced Density Alternative.

Table V.E-11
Estimated Operational Solid Waste Generation by the Reduced Density Alternative

Type of Use	Size	Solid Waste Generation Rate [a] (lbs/unit/day)	Total Solid Waste Generated (lbs/day)
Existing Uses			
General Office	27,204 sf	0.006 lbs/sf/day	163
Medical/Dental Office	58,112 sf	0.007 lbs/sf/day	407
High-Turnover Restaurant (996 sf)	10 emp [b]	10.53 lbs/emp/day	105
Parking Garage	59,492 sf	0 lbs/sf/day	0
		Existing Solid Waste Generation:	**675**
Proposed Project			
Multi-Family Residential	277 du	12.23 lbs/du/day	3388
Commercial/Retail (16,500 sf)	50 emp [b]	10.53 lbs/employee/day	527
		Total Reduced Density Alternative Solid Waste Generation:	**3,915**
		Less Existing Uses:	*-675*
		NET TOTAL Solid Waste Generation:	**3,240**

Notes: sf =square feet; du = dwelling units; emp = employee
[e] *L.A. CEQA Thresholds Guide, page M.3-2. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*
[f] *Employee generation based on Section IV.I, Population, Housing, and Employment.*
Source: Parker Environmental Consultants.

V. PROJECT ALTERNATIVES
F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6 of the State CEQA Guidelines requires that an "environmentally superior" alternative be selected among the alternatives that are evaluated in the EIR. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. As discussed in this chapter, the environmentally superior alternative would be the No Project Alternative. The No Project Alternative would eliminate the Project's significant and unavoidable impacts related to the loss of a designated historic resource and construction noise and vibration impacts. The No Project Alternative would not achieve any of the Applicant's stated Project Objectives, as it would maintain the status quo.

However, as required by CEQA, when the No Project Alternative is shown to be environmentally superior over the Proposed Project, a separate Environmentally Superior Project Alternative shall be identified among the alternatives analyzed within the EIR. Based on a review of the project alternatives identified in this EIR, none of the alternatives would be effective in eliminating the Project's significant and unavoidable construction noise and vibration impacts. Table V.F-1, Environmentally Superior Alternative Matrix presents a summary of the impact conclusions for each alternative relative to the impact statements for each impact areas evaluated in the EIR for the Proposed Project.

Of the alternatives evaluated, the Adaptive Reuse Alternatives and the Commercial Reuse Alternative, would both eliminate the project's significant and unavoidable impact associated with the proposed demolition of a historic resource. Although these alternatives would both reduce the amount of construction noise and vibration, significant noise and vibration impacts would still occur on a temporary basis. Although the construction period would be reduced as compared to the Proposed Project, the level of intensity for construction noise and vibration would be similar to the Proposed Project relative to the demolition and construction activities proposed for the North Block.

In evaluating the environmental benefits of either the Adaptive Reuse Alternative or Commercial Reuse Alternative, the reduction in environmental impacts appears to be relatively equal. Therefore, for purposes of selecting an environmentally superior alternative these alternatives were evaluated for their ability to achieve the Project Objectives. Table V.F-2, below, provides a table comparison of the alternatives ability to meet the Project Objectives. As shown in Table V.F-2, the Adaptive Reuse Alternative has the potential to meet more Project Objectives than the Commercial Reuse Alternative. For that reason, the Adaptive Reuse Alternative is identified as the environmentally superior alternative.

Table V.F-1
Environmentally Superior Alternative Matrix

Environmental Impacts	Proposed Project	No Project Alternative	Adaptive Reuse Alternative	Commercial Reuse Alternative	Reduced Density Alternative
Aesthetics	LTS	LTS (reduced)	LTS (reduced)	LTS (increased)	LTS (same)
Air Quality	LTS	LTS (reduced)	LTS (reduced)	LTS (increased)	LTS (reduced)
Cultural Resources					
Historic Resources	SU	LTS (reduced)	LTS (reduced)	LTS (reduced)	SU (same)
Archaeological Resources	LTS	LTS (reduced)	LTS (reduced)	LTS (reduced)	LTS (same)
Paleontological Resources	LTS	LTS (reduced)	LTS (reduced)	LTS (reduced)	LTS (same)
Geology/Soils	LTS	LTS (reduced)	LTS (same)	LTS (same)	LTS (same)
Greenhouse Gas Emissions	LTS	LTS (reduced)	LTS (reduced)	LTS (reduced)	LTS (reduced)
Hazards and Hazardous Materials	LTS	LTS (reduced)	LT S (same)	LTS (same)	LTS (same)
Land Use and Planning	LTS	LTS (reduced)	LTS (same)	LTS (same)	LTS (same)
Noise					
Construction	SU	No Impact (reduced)	SU (reduced)	SU (reduced)	SU (reduced)
Operation	LTS	LTS	LTS (reduced)	LTS (increased)	LTS (reduced)
Population, Housing and Employment	LTS	LTS (reduced)	LTS (reduced)	LTS (reduced)	LTS (reduced)
Public Services	LTS	LTS (reduced)	LTS (reduced)	LTS (reduced)	LTS (reduced)
Traffic	LTS	LTS (reduced)	LTS (reduced)	LTS (increased)	LTS (reduced)
Public Utilities	LTS	LTS (reduced)	LTS (reduced)	LTS (reduced)	LTS (reduced)

Notes: LTS = Less Than Significant Impact after mitigation (where mitigation is needed).
SU= Significant and Unavoidable Impact.
All impact conclusions refer to the level of impact after mitigation. Impact comparisons as to the same, increased or reduced refers to the level of impact as compared to the Proposed Project. Shaded cells indicate a change from a Proposed Project significant unavoidable impact to a less than significant impact.

Table V.F-2
Comparison of Adaptive Reuse Alternative and Commercial Reuse Alternative to Meet the Project Objectives

Project Objectives	Alternatives Evaluation	
	Adaptive Reuse Alternative	**Commercial Reuse Alternative**
1. To contribute to the revitalization of the Central City West Specific Plan area by providing new "smart-growth" infill development with residential, retail and restaurant uses.	**Partially.** Reutilization of the parking structure on the North Block would represent smart growth principles by making better utilization of the land with respect to increasing density in a developed part of the city. Although no new development would occur on the South Block, the adaptive reuse of the existing buildings would contribute to the revitalization of the neighborhood as it would keep the site active and productive with residential and retail land uses.	**Partially.** Reutilization of the parking structure on the North Block would represent smart growth principles by making better utilization of the land with respect to increasing density in a developed part of the city. Although no new development would occur on the South Block, the adaptive reuse of the existing buildings would contribute to the revitalization of the neighborhood as it would keep the site active and productive with commercial office and retail uses.
2. To provide housing in order to contribute to housing needs based on the current and projected housing demand in the City of Los Angeles.	**Yes. (Superior)** This alternative would provide a total of 223 multi-housing units, with 142 dwelling units on the North Block and 81 adaptive re-use dwelling units on the South Block. Although 173 fewer units would be realized as compared to the Proposed Project, this alternative would include 81 more units than the Adaptive Reuse Alternative.	**Yes.** This alternative would provide a total of 142 dwelling units on the North Block. This Alternative would result in 227 fewer units as compared to the Proposed Project and 81 fewer units as compared to the Commercial Reuse Alternative.
3. To provide new high-quality structures that meet current California Green Code (Cal Green) and the City of Los Angeles Green Building Code standards.	**No.** The adaptive reuse of the buildings on the South Block would serve to prolong the lifespan and economic viability of the existing structures, this alternative would not achieve the Project's objective to replace the existing underutilized and aging structures with new structures that meet Cal Green Code and City of LA Green Building Code Standards.	**No.** Unlike the adaptive reuse of the buildings on the South Block would serve to prolong the lifespan and economic viability of the existing structures, this alternative would not achieve the Project's objective to replace the existing underutilized and aging structures with new structures that meet Cal Green Code and City of LA Green Building Code Standards.
4. To provide a viable project that promotes the City's economic well-being by significantly increasing tax revenues.	**No.** It is currently unknown whether this alternative is financially feasible from a development standpoint. While this alternative, if developed, would increase the City's tax revenues, revenue would be greatly reduced as compared to the Project, as there would be no new development on the South Block.	**No.** It is currently unknown whether this alternative is financially feasible from a development standpoint. While this alternative, if developed would, increase the City's tax revenues, revenue would be greatly reduced as compared to the Project, as there would be no new development on the South Block.
5. To enhance the neighborhood with new, modern and attractive infill predominantly residential mid-rise development.	**Partially.** This alternative would provide new construction on the North Block (replacing an unsightly garage with residential uses, and would include interior aesthetic improvements to the existing structures on the South Block. The unattractive older buildings on the	**Partially.** This alternative would provide new construction on the North Block (replacing an unsightly garage with residential uses, and would include interior aesthetic improvements to the existing structures on the South Block. The unattractive older buildings on the

	South Block would remain in place and there would not be an appreciable improvement in the appearance and curb appeal of the neighborhood as viewed form 6th Street.	South Block would remain in place and there would not be an appreciable improvement in the appearance and curb appeal of the neighborhood as viewed form 6th Street.
6. To orient housing and retail toward the street to make for a safer neighborhood ("eyes on the street") and enhance pedestrian activity by including residential stoops and other design features.	**No.** The Adaptive Reuse Alternative would require two levels of above grade parking on 5th Street which would preclude the ability of the project to provide residential stoops on the ground floor. The ground floor would include a residential lobby with a secured access for residents and a separate entry to access the commercial parking area. This alternative would result in reduced pedestrian activity on 5th Street as all the residences would be accessible via the interior elevator and stairways.	**No.** The Commercial Reuse Alternative would require five levels of above grade parking on 5th Street which would preclude the ability of the project to provide residential stoops on the ground floor. The ground floor would include a residential lobby with a secured access for residents and a separate entry to access the commercial parking area. This alternative would result in reduced pedestrian activity on 5th Street as all the residences would be accessible via the interior elevator and stairways.
7. To support a reduction in vehicle miles traveled by providing high-density multi-family housing and jobs in a designated Transit Priority Area in close proximity to mass transit.	**Yes. (Superior)** The Adaptive Reuse Alternative would result in approximately 1,766 average daily trips. Comparatively, this alternative would result in 393 fewer average daily trips as compared to the existing conditions and 980 fewer average daily trips as compared to the Proposed Project.	**Yes.** The Commercial Reuse Alternative would generate approximately 2,377 average daily trips. Comparatively, this alternative would result in 218 additional average daily trips as compared to the existing land uses and 369 fewer daily trips as compared to the Proposed Project. Compared to the Proposed Project this Alternative would reduce the average daily trips associated with new development.
8. To create an arrangement of land uses and new development that encourage and contribute to the economic, social, and physical health of the expanding residential community in the Westlake community.	**Yes.** The Adaptive Reuse Alternative would result in new development that encourages and contributes to the economic, social, and physical health of the expanding residential community in the Westlake community.	**Yes.** The Commercial Reuse Alternative would result in new development that encourages and contributes to the economic, social, and physical health of the expanding residential community in the Westlake community.
9. To provide on-site parking in secure areas on-site that minimizes the distance between the future tenants' and visitors' parking space and destination.	**No.** This alternative would retain the existing land use on the South Block and would require all of the parking to be provided within the new residential building in the North Block. The residents of the adaptive reuse building would not have secured on site parking and would be required to park across the alley. This configuration would increase the walking distance between parking stall and dwelling units and would be less secured as compared to on-site parking.	**No.** This alternative would retain the existing land use on the South Block and would require all of the parking to be provided within the new residential building in the North Block. The commercial employees and visitors of the commercial uses on the South Block would be required to park across the alley, resulting in a co-mingling of commercial and residential parking spaces. This configuration would increase the walking distance between parking stall and dwelling units and would be less secured as compared to on-site parking.
10. To activate the retail pedestrian	**No.** The Adaptive Reuse Alternative would provide	**No.** The Commercial Adaptive Reuse Alternative would

activity on 6th Street with neighborhood serving commercial retail land uses that are highly visible and accessible at-grade level.	limited retail uses on 6th Street in Building B and no commercial retail space in Building A. Further, ground floor of the existing Building B is blocked by a mural wall that limits accessibility and visibility of the retail space. The ground floor of Building A is set back from the sidewalk and is elevated such that the façade and entry is removed from the street level activity. The retention of the existing Buildings would not activate the pedestrian activity on 6th Street.	provide limited ground floor retail uses on 6th Street in Building B and ground floor commercial office space in Building A. The ground floor of Building B is blocked by a mural wall that limits accessibility and visibility of the retail space. The ground floor of Building A is set back from the sidewalk and is elevated such that the façade and entry is removed from the street level activity. The retention of the existing Buildings would not activate the pedestrian activity on 6th Street.
11. To provide a balance of residential unit types and sizes that will accommodate a variety of residential needs for an array of household types in a transit oriented district within close proximity to employment opportunities and schools.	**No**. As a result of the increased parking demands, this alternative would result in mostly studios and smaller unit sizes on the North Block as compared to the Proposed Project. The first two levels of the residential building would be occupied by parking areas, thus there would be two fewer levels of residential floor area. On the South Block, smaller unit sizes result from the configuration of the existing building, while maintaining an acceptable unit count. Smaller units sizes would reduce the diversity of households that would be attracted to the Project Site as fewer families would be able to reside on site. The Project would predominately serve single-family or two-person households.	**No**. As a result of the increased parking demands within the North Building, this alternative would result in smaller unit sizes as compared to the Proposed Project. This Alternative would result in fewer units overall and would necessitate smaller units due to the reduced building area allocated to residential uses. Smaller units sizes would reduce the diversity of households that would be attracted to the Project Site as fewer families would be able to reside on site. The Project would predominately serve single-family or two-person households.