

# ALSTON & BIRD

333 South Hope Street, 16th Floor  
Los Angeles, CA 90071-1410  
213-576-1000 | Fax: 213-576-1100

Edward J. Casey

Direct Dial: 213-576-1005

Email: [ed.casey@alston.com](mailto:ed.casey@alston.com)

*VIA ELECTRONIC MAIL*

February 26, 2021

Sergio Ibarra, City Planner  
City of Los Angeles  
Department of City Planning  
200 North Spring Street, Suite 721  
Los Angeles, CA 90012

Re: **Olympic Tower Project**  
**Response to Capital Hall Partners' Appeal Justification**  
**Case No. CPC-2015-4557-MCUP-CUX-TDR-SPR-DD;**  
**ENV-2015-4558-EIR**

Dear Mr. Ibarra:

This letter is hereby submitted on behalf of Olymfig26, LLC (“Project Applicant”) in response to the appeal justification letter dated June 10, 2020 (“June 2020 Letter”), submitted by LA Fig Property Owner, LLC and Capital Hall Partners, LLC (collectively, Capital Hall”), concerning their administrative appeal of the City Planning Commission’s (“CPC”) approvals for the Olympic Tower Project (“Project”). Capital Hall’s comments in the June 2020 Letter do not raise any new concerns about the Project that were not previously raised in Capital Hall’s appeal letter submitted on October 25, 2019, or in their letters dated February 10 and March 10, 2020, concerning their appeal. For the reasons previously submitted, the appeal justifications are without merit, and Capital Hall’s appeals should be denied.

## **I. Responses Previously Provided Addressing Capital Hall’s Key Issues**

As summarized in the chart in Attachment A, each of Capital Hall’s concerns has been thoroughly addressed during the design, entitlement, and environmental review process. The Project Applicant has responded to each of Capital Hall’s concerns in previously submitted response letters dated March 5, March 11 and April 10, 2020. The Project Applicant hereby incorporates its responses in those previous submissions. Capital Hall has not raised any potential environmental impacts that have not already been considered and addressed thoroughly in the environmental impact report (“EIR”), and no recirculation of the EIR is required.

## II. Proposed Changes to Mitigation Measures

The EIR and Project Applicant's previous submissions provide substantial evidence supporting the City's approval and findings for the Project. However, after reviewing prior comment letters submitted to the City concerning the Project, the Project Applicant suggests the following clarifications to certain mitigation measures and provides further evidence supporting the efficacy of the Project's mitigation measures. Proposed additions to the mitigation measures are provided in bold underline.

### Air Quality

For the measures to mitigate the Project's potential air quality impacts, Capital Hall asserts mitigation measures MM C-1 and MM C-2 are unenforceable and ineffective. However, Capital Hall provides no substantial evidence to support such a claim, providing no evidence that Tier 4 engines or 2010 model year or newer diesel haul trucks cannot be deployed during construction. Tier 4 engines have been phased in nationwide since 2008 for all engine types. While some manufacturers were given limited flexibility to phase in compliant engines under the Transition Program for Equipment Manufacturers ("TPEM"), this provided up to seven years of additional time to offer such equipment. For engines less than 56 horsepower (hp), this TPEM period ended at the end of 2014. Engines between 56 and 130 hp had until the end of 2018, while larger engines of 130 hp or more ended at the end of 2017. As a result, Tier 4 equipment is commercially available from all manufactures, especially for common types of equipment to be used during construction of the Project. MM C-1 confirms any emissions control devices shall achieve appropriate performance standards. Mitigation measures C-1 and C-2 are technically feasible and enforceable.

For further clarification, the Project Applicant suggests the following revisions (in bold below) to MM C-1:

**Mitigation Measure C-1** - All off-road construction equipment greater than 50 horsepower shall be required to meet USEPA **Final** Tier 4 emission standards to reduce NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions at the Project Site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.

During plan check, the Project Applicant shall make available to the lead agency and SCAQMD a comprehensive inventory of all off-road construction equipment, equal to or greater than 50 horsepower that shall

be used during any portion of demolition/excavation activities and concrete pour days for mat foundation for the Project. The inventory shall include the horsepower rating, engine production year, and certification of the specified Tier standard. A copy of each unit's certified tier specification, Best Available Control Technology documentation, and CARB or SCAQMD operating permit shall be available on-Site at the time of mobilization of each applicable unit of equipment to allow the Construction Monitor to compare the on-site equipment with the inventory and certified Tier specification and operating permit. Off road diesel-powered equipment within the construction inventory list described above shall meet **Final** Tier 4 CARB/U.S. EPA standards.

### **Cultural Resources**

Capital Hall asserts the Project's measures to mitigate impacts to the inadvertent discovery of archaeological resources are ineffective because they only require the Project Applicant to study and monitor resources during construction. However, MM D-2 requires the Project Applicant to prepare a Monitoring and Mitigation Plan, which will address treatment of such resources if discovered. In addition, the City's environmental condition of approval No. 5 as required in the CPC's Letter of Determination dated May 26, 2020, mandates any resources discovered must be treated in accordance with state requirements. Substantial evidence supports the finding that potential impacts to archeological resources will be less than significant.

### **Noise/Vibration**

Finally, Capital Hall asserts the measures to mitigate the Project's potential impacts related to noise and vibration lack performance standards and are not enforceable. For the reasons already submitted to the City, substantial evidence shows the noise and vibration mitigation measures are feasible and effective. However, for further clarification, the Project Applicant suggest the following revisions (in bold) to MM I-1 and MM I-2:

**Mitigation Measure I-1** - All diesel-powered construction vehicles shall be equipped with exhaust mufflers **capable of achieving a sound attenuation of at least 3dBA** or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA. Should they be required, generators shall be solar-powered.

**Mitigation Measure I-2** - Temporary sound barriers capable of achieving a sound attenuation of at least 5 dBA **from sensitive receptors** shall be erected along the Project's boundaries.

For the reasons summarized above and in previous submissions by the Project Applicant to the City during the administrative process, there has been no new information provided by Capital Hall that shows the Project would cause a significant impact that has not already been disclosed and analyzed in the EIR. Further, substantial evidence supports the finding that recirculation of the EIR is not required. Based on the City's extensive environmental

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review of the Project and the substantial evidence in the record that supports the City's findings, we urge the City Council to deny Capital Hall's appeal. We look forward to the City's further consideration of the Project.

Very truly yours,



Edward J. Casey

EJC/dtc

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ATTACHMENT A

**Olympic Tower Project**

**Capital Hall Concerns Previously Raised and Addressed by Applicant**

<b>Issue Area</b>	<b>Capital Hall Concern Raised in June 20, 2020 Letter</b>	<b>Concern Raised in Previous Capital Hall Submissions</b>	<b>Addressed in Environmental Review &amp; Previous Applicant Responses</b>
<b>Public Notice</b>	<ul style="list-style-type: none"><li>• The City did not provide adequate notice of the CPC hearing on October 10, 2019. (p. 2.)</li></ul>	<ul style="list-style-type: none"><li>• October 25, 2019 (p. 2.)</li><li>• February 10, 2020 (p. 2.)</li></ul>	<ul style="list-style-type: none"><li>• City provided adequate notice of CPC hearing. (Project Applicant Response to Capital Hall Appeal, March 5, 2020.)</li></ul>

Issue Area	Capital Hall Concern Raised in June 20, 2020 Letter	Concern Raised in Previous Capital Hall Submissions	Addressed in Environmental Review & Previous Applicant Responses
<p style="text-align: center;"><b>Design</b></p>	<ul style="list-style-type: none"> <li>• The Project’s height, massing, and density are inappropriate for the site and incompatible with nearby historic resources. (pp. 2-3.)</li> <li>• The Project will be built to the Hotel Figueroa property line, with no setback, blocking the Hotel Figueroa’s southern frontage. (p. 4.)</li> <li>• The Project will eliminate air and sunlight at the Hotel Figueroa, including at its recently renovated pool and outdoor areas. (p. 4.)</li> <li>• Project construction will take three years, with no staging area. (p. 4.)</li> </ul>	<ul style="list-style-type: none"> <li>• October 25, 2019 (pp. 2-3.)</li> <li>• February 10, 2020 (pp. 2-4.)</li> </ul>	<ul style="list-style-type: none"> <li>• Appropriateness and compatibility of Project addressed in the Draft EIR – Section IV.D (Cultural Resources), Draft EIR – Appendix D (<i>Olympic Tower L.A. Historic Resources Report</i>), Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy (Mar. 5, 2020), Response to YWCA (Mar. 5, 2020), Response to Capital Hall – Attachment B – Historic Resources Report (April 10, 2020)</li> <li>• Setback and frontage of Project addressed in Draft EIR – Section IV.B (Aesthetics), Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy (Mar. 5, 2020), Response to YWCA (Mar. 5, 2020)</li> <li>• Air and sunlight to adjacent properties addressed in Draft EIR – Section IV.B (Aesthetics), Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy</li> </ul>

<b>Issue Area</b>	<b>Capital Hall Concern Raised in June 20, 2020 Letter</b>	<b>Concern Raised in Previous Capital Hall Submissions</b>	<b>Addressed in Environmental Review &amp; Previous Applicant Responses</b>
			<p>(Mar. 5, 2020), Response to YWCA (Mar. 5, 2020), Response to Capital Hall – Attachment C – Shade and Shadow Report (April 10, 2020)</p> <ul style="list-style-type: none"> <li>• Construction staging area addressed Response to Capital Hall – Attachment D – Noise and Vibration Report (April 10, 2020)</li> </ul>



Issue Area	Capital Hall Concern Raised in June 20, 2020 Letter	Concern Raised in Previous Capital Hall Submissions	Addressed in Environmental Review & Previous Applicant Responses
Noise	<ul style="list-style-type: none"> <li>• Independent noise consultant Ganddini Group provided analysis and peer review of EIR’s noise analysis. (p. 4.)</li> <li>• EIR failed to adequately analyze construction noise impacts because did not evaluate sensitive receptors, relies on erroneous construction equipment assumptions, fails to correctly model all phases of construction, incorrectly applies City’s CEQA thresholds. (p. 4.)</li> <li>• Mitigation measures for noise impacts are inadequate. (pp. 4-5.)</li> <li>• The EIR fails to disclose, analyze, and mitigate the following impacts of the Project: Traffic noise impacts; and Operational noise impacts. (p. 6.)</li> </ul>	<ul style="list-style-type: none"> <li>• October 25, 2019 (p. 6.)</li> <li>• February 10, 2020 (pp. 4-5.)</li> </ul>	<ul style="list-style-type: none"> <li>• Potential noise impacts on Hotel Figueroa addressed in Draft EIR – Section IV.I (Noise), Final EIR – Response to Comment GSEJA-8, Response to Capital Hall (Mar. 5, 2020), Response to Capital Hall – Attachment D – Noise Report (April 10, 2020)</li> <li>• Model assumptions for noise analysis addressed in Draft EIR – Section IV.I (Noise), Final EIR – Response to Comment GSEJA-7, Response to Capital Hall (Mar. 5, 2020), Response to Capital Hall – Attachment D – Noise Report (April 10, 2020)</li> <li>• Potential traffic and operational noise impacts including on Hotel Figueroa addressed in Draft EIR – Section IV.I (Noise), Final EIR – Response to Comments GSEJA-7–9, Response to Capital Hall (Mar. 5, 2020), Response to Capital Hall – Attachment D – Noise and Vibration Report (April 10, 2020)</li> </ul>

<b>Issue Area</b>	<b>Capital Hall Concern Raised in June 20, 2020 Letter</b>	<b>Concern Raised in Previous Capital Hall Submissions</b>	<b>Addressed in Environmental Review &amp; Previous Applicant Responses</b>
			<ul style="list-style-type: none"> <li>• Evaluation of Ganddini Group's analysis, Response to Capital Hall – Attachment D – Noise and Vibration Report (April 10, 2020)</li> </ul>

<b>Vibration / Structural</b>	<ul style="list-style-type: none"> <li>• The EIR admits that Project construction will result in significant vibration impacts on the historic, 1920's era Hotel Figueroa. (p.6.)</li> <li>• The EIR masks the full extent of the Project's vibration impacts by relying on an incomplete and inaccurate list of construction equipment. (p. 6.)</li> <li>• The proposed mitigation measures lack performance standards, are unenforceable, and infeasible, including MM I-3 and MM I-5. (p. 6.)</li> <li>• MM I-5 may physically and structurally damage the Hotel Figueroa. (p. 6.)</li> <li>• Proposes different mitigation measures for potential vibration impacts (pp. 6-8.)</li> <li>• EIR is missing shoring or vibration mitigation plans. (p. 8.)</li> <li>• Project could led to cracking of concrete floor slabs, cracking of walls, and damages to finishes at Hotel Figueroa. (p. 8.)</li> <li>• Proposes different mitigation measures for potential structural impacts (pp. 9.)</li> </ul>	<ul style="list-style-type: none"> <li>• October 25, 2019 (pp. 4-5.)</li> <li>• February 10, 2020 (pp. 5-7.)</li> </ul>	<ul style="list-style-type: none"> <li>• Potential construction vibration impacts on the Hotel Figueroa addressed in Draft EIR – Section IV.D (Cultural Resources), Draft EIR – Appendix D (<i>Olympic Tower L.A. Historic Resources Report</i>), Final EIR – Response to Comment GSEJA-8, Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy (Mar. 5, 2020), Response to YWCA (Mar. 5, 2020), Response to Capital Hall – Attachments B, D, and E (April 10, 2020)</li> <li>• Equipment assumptions for vibration analysis addressed in Draft EIR – Section IV.D (Cultural Resources), Draft EIR – Section IV.I (Noise), Response to Capital Hall (Mar. 5, 2020), Response to Capital Hall – Attachments D and E (April 10, 2020)</li> <li>• Adequacy of mitigation measures for vibration impacts addressed in Draft EIR – Section IV.I (Noise), Final EIR – Response to Comment GSEJA-8, Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy (Mar. 5,</li> </ul>
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			<p>2020), Response to YWCA (Mar. 5, 2020), Response to Capital Hall – Attachment D – Noise and Vibration Report (April 10, 2020)</p> <ul style="list-style-type: none"> <li>• Enforceability of mitigation measures for vibration impacts addressed in Draft EIR – Section IV.I (Noise), Final EIR – Response to Comment GSEJA-8, Response to Capital Hall (Mar. 5, 2020), Response to Capital Hall – Attachment D – Noise and Vibration Report (April 10, 2020)</li> <li>• Scope of mitigation measures for vibration impacts addressed in Draft EIR – Section IV.I (Noise), Final EIR – Response to Comment GSEJA-8, Response to Capital Hall (Mar. 5, 2020), Response to Capital Hall – Attachment D – Noise and Vibration Report (April 10, 2020)</li> <li>• Adequacy of mitigation measures to protect Hotel Figueroa from structural damage addressed in Draft EIR – Section IV.D (Cultural Resources), Draft EIR – Appendix D (<i>Olympic Tower L.A. Historic Resources</i></li> </ul>
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			<p><i>Report</i>), Draft EIR – Section IV.I (Noise), Final EIR – Response to Comment GSEJA-8, Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy (Mar. 5, 2020), Response to YWCA (Mar. 5, 2020), Response to Capital Hall – Attachment D – Noise and Vibration Report (April 10, 2020)</p>
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Issue Area	Capital Hall Concern Raised in June 20, 2020 Letter	Concern Raised in Previous Capital Hall Submissions	Addressed in Environmental Review & Previous Applicant Responses
<p><b>Cultural Resources</b></p>	<ul style="list-style-type: none"> <li>• Peer review of analysis on cultural and historic resources by Historic Resources Group (HRG) concludes EIR’s analysis is flawed. (p. 9.)</li> <li>• Project is incompatible with the Hotel Figueroa and threatens its historic integrity. (p. 10.)</li> <li>• The Project violates the Secretary of the Interior’s Standards for the Treatment of Historic Properties and is inconsistent with Standard 9 regarding “related new construction.” (pp. 10-11.)</li> <li>• Mitigation for potential impacts to archeological resources is inadequate. (p. 11.)</li> </ul>	<ul style="list-style-type: none"> <li>• October 25, 2019 (p.5.)</li> <li>• February 10, 2020 (pp. 8-9.)</li> </ul>	<ul style="list-style-type: none"> <li>• Response to HRG analysis Response to Capital Hall – Attachment B – Historic Resources Report (April 10, 2020)</li> <li>• Potential aesthetic impacts on historic resources addressed in Draft EIR – Section IV.B (Aesthetics), Draft EIR – Section IV.D (Cultural Resources), Draft EIR – Appendix D (<i>Olympic Tower L.A. Historic Resources Report</i>), Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy (Mar. 5, 2020), Response to YWCA (Mar. 5, 2020), Response to Capital Hall – Attachment B – Historic Resources Report (April 10, 2020)</li> <li>• Inapplicability of Secretary of Interior Standard’s and informative analysis in Draft EIR – Section IV.D (Cultural Resources), Draft EIR – Appendix D (<i>Olympic Tower L.A. Historic Resources Report</i>), Supplemental</li> </ul>

Issue Area	Capital Hall Concern Raised in June 20, 2020 Letter	Concern Raised in Previous Capital Hall Submissions	Addressed in Environmental Review & Previous Applicant Responses
			Response to Capital Hall (Mar. 13, 2020), Response to Capital Hall – Attachment B – Historic Resources Report (April 10, 2020)
	<ul style="list-style-type: none"> <li>Capital Hall cites to concerns from the L.A. Conservancy and YWCA Greater Los Angeles concerning impacts to Hotel Figueroa’s physical and historic integrity. (p. 11.)</li> </ul>		<ul style="list-style-type: none"> <li>YWCA concerns addressed in Response to YWCA (Mar. 5, 2020)</li> <li>LA Conservancy concerns addressed in Response to LA Conservancy (Mar. 5, 2020)</li> <li>Response to Capital Hall (April 10, 2020)</li> </ul>
<b>Aesthetics</b>	<ul style="list-style-type: none"> <li>Project will degrade existing visual character of surroundings. (p. 11.)</li> <li>Project will cause significant impacts on surrounding historic resources. (p. 11.)</li> <li>Project will cause shade/shadow impacts, citing to report from Architectonica International Corporation. (p. 11.)</li> <li>The EIR improperly relies on SB 743 to conclude that the Project will have no aesthetic impacts. (p. 12.)</li> </ul>	<ul style="list-style-type: none"> <li>October 25, 2019 (p. 4.)</li> <li>February 10, 2020 (pp. 9-10.)</li> </ul>	<ul style="list-style-type: none"> <li>Applicability of SB 743 and lack of impacts on historic resources addressed in Draft EIR – Section IV.B (Aesthetics), Draft EIR – Section IV.D (Cultural Resources), Draft EIR – Appendix D (<i>Olympic Tower L.A. Historic Resources Report</i>), Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy (Mar. 5, 2020), Response to YWCA (Mar. 5, 2020), Response to</li> </ul>

Issue Area	Capital Hall Concern Raised in June 20, 2020 Letter	Concern Raised in Previous Capital Hall Submissions	Addressed in Environmental Review & Previous Applicant Responses
			<p>Capital Hall – Attachments B and C (April 10, 2020)</p> <ul style="list-style-type: none"> <li>• Potential shade and shadow impacts addressed in Draft EIR – Section IV.B (Aesthetics), Response to Capital Hall (Mar. 5, 2020), Response to LA Conservancy (Mar. 5, 2020), Response to YWCA (Mar. 5, 2020), Response to Capital Hall – Attachment C – Shade and Shadow Report (April 10, 2020)</li> </ul>
<p><b>Air Quality/ Greenhouse Gas</b></p>	<ul style="list-style-type: none"> <li>• Project could lead to significant pollutant emissions. (p. 12.)</li> <li>• EIR fails to include information on Project’s health risks from toxic air contaminants. (p. 12.)</li> <li>• EIR does not adequately mitigate for construction emissions impacts, applying only two standard mitigation measures. (p.12.)</li> <li>• GHG analysis uses improper methodology, relying on inadequate emissions reduction plans. (p. 12.)</li> </ul>	<ul style="list-style-type: none"> <li>• October 25, 2019 (pp. 6-7.)</li> <li>• February 10, 2020 (p.11.)</li> </ul>	<ul style="list-style-type: none"> <li>• Project’s potential air quality impacts and adequacy of mitigation measures addressed in Draft EIR – Section IV.C-1 (Air Quality), Final EIR – Response to Comment SCAQMD-2, Final EIR – Responses to Comments CREED LA, Response to Capital Hall (March 5, 2020).</li> <li>• Health Risk Assessment for Project’s impacts not warranted or necessary. Final EIR – Response to Comment CREED LA 2-10, Response to Capital Hall (March 5, 2020).</li> </ul>



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			<ul style="list-style-type: none"> <li>Project’s potential greenhouse gas impacts addressed in Draft EIR – Section IV.F-1 (Greenhouse Gas), Final EIR – Response to Comment CREED LA 2/SWAPE AQ-1, Response to Capital Hall (March 5, 2020).</li> </ul>
<b>Hazardous Materials</b>	<ul style="list-style-type: none"> <li>Project site previously operated as a gas station with underground fuel storage tanks. Project construction will disturb contaminated soil. (p. 13.)</li> </ul>	<ul style="list-style-type: none"> <li>October 25, 2019 (p.7.)</li> <li>February 10, 2020 (p.11.)</li> </ul>	<ul style="list-style-type: none"> <li>Project’s potential impacts related to hazards and hazardous materials addressed in Draft EIR – Section IV.G-1 (Hazards and Hazardous Materials), Final EIR – Response to Comment CREED LA 2-25.</li> </ul>
<b>Land Use</b>	<ul style="list-style-type: none"> <li>Project is inconsistent with City’s land use policies related to affordable housing, density, and land use compatibility. (p. 13.)</li> </ul>	<ul style="list-style-type: none"> <li>October 25, 2019 (p. 7.)</li> <li>February 10, 2020 (p.11.)</li> </ul>	<ul style="list-style-type: none"> <li>Project’s potential land use impacts addressed in Draft EIR – Section IV.H-1 (Land Use and Planning), Response to Capital Hall (March 5, 2020).</li> </ul>

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<b>Population and Housing</b>	<ul style="list-style-type: none"> <li>EIR fails to adequately analyze and mitigate Project’s potential impacts related to population and housing. (p. 13.)</li> </ul>	<ul style="list-style-type: none"> <li>October 25, 2019 (p. 7.)</li> <li>February 10, 2020 (p. 11.)</li> </ul>	<ul style="list-style-type: none"> <li>Project’s potential population and housing impacts addressed in Draft EIR – Section IV.J-1 (Population and Housing), Final EIR – Response to Comment GSEJA-10, Response to Capital Hall (March 5, 2020).</li> </ul>
<b>Transportation</b>	<ul style="list-style-type: none"> <li>Project’s significant and unavoidable traffic impacts will interfere with operations of surrounding businesses, including Hotel Figueroa. (p. 13.)</li> <li>Project does not apply all feasible mitigation measures to reduce the traffic impacts. (pp. 13-14.)</li> </ul>	<ul style="list-style-type: none"> <li>October 25, 2019 (pp. 7-8.)</li> <li>February 10, 2020 (p.11.)</li> </ul>	<ul style="list-style-type: none"> <li>Project’s potential transportation impacts addressed in Draft EIR – Section IV.L-1 (Transportation/Traffic), Response to Capital Hall (March 5, 2020).</li> </ul>
<b>Alternatives</b>	<ul style="list-style-type: none"> <li>EIR fails to evaluate reasonable range of alternatives. (p. 14.)</li> </ul>	<ul style="list-style-type: none"> <li>October 25, 2019 (p.8.)</li> <li>February 10, 2020 (p.11.)</li> </ul>	<ul style="list-style-type: none"> <li>Analysis of alternatives to Project addressed in Draft EIR – Section VI-1 (Alternatives to the Proposed Project), Response to Capital Hall (March 5, 2020).</li> </ul>