

Chapter V

Alternatives

1. Introduction

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

Guidance regarding the definition of project alternatives is provided in CEQA Guidelines Section 15126.6(a) and is summarized in part in the excerpt below.

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.

The CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability of the alternative to avoid or substantially lessen significant impacts relative to the proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.”¹ The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are analyzed.²

The project alternatives selected for analysis in an EIR, must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

¹ CEQA Guidelines Section 15126.6(b).

² CEQA Guidelines Section 15126.6(f).

CEQA Guidelines Section 15626.6(e) requires the analysis of a “no project” alternative and, depending on the circumstances, evaluation of alternative location(s) for the project, if feasible.³ Based on the alternatives analysis, an environmentally superior alternative is to be designated. In general, the environmentally superior alternative is the alternative with the least adverse impacts on the environment. If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify another environmentally superior alternative among the other alternatives.⁴

CEQA Guidelines Section 15126.6(d) states that the EIR is required to provide sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project. It further states that, if an alternative would cause one or more significant effects in addition to those that would be caused by the proposed project, the alternatives analysis need not discuss those effects in the same level of detail as the significant effects of the proposed project are discussed.

2. Objectives of the Project

Chapter II, *Project Description*, of this Draft EIR sets forth the Project Objectives defined by the Applicant and the Lead Agency. The underlying purpose of the Project is to redevelop the Project Site, which contains low-rise commercial buildings, with a mixed-use development that provides medical office and retail-commercial uses.

1. Encourage economic growth in the community through the creation of construction jobs and full-time, on-site jobs.
2. Redevelop the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities to serve the local community and regional area near a key regional medical center.
3. Incorporate sustainable and green building design and construction that exceed building code and Title 24 requirements in areas related to landscape design (green roofs/balconies) to incorporate ecofriendly building materials, systems and features, solar efficiency (solar ready roofs), efficient and low flow water management non-VOC paints and adhesives, high performance building envelope and energy efficient building systems.
4. Develop the site with a well-designed commercial and medical office project within a transit priority area which would maximize the benefit of nearby Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, an Antelope Valley Transit Authority (AVTA) bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station (expected to

³ CEQA Guidelines Sections 15126.6(e), 15126.6(f)(1).

⁴ CEQA Guidelines Section 15126.6(e)(2).

open in 2023) and, thus, would support smart growth with the intent of reducing air quality emissions and VMT generation.

5. Construct a medical office building at an intensity consistent with the zoning for commercial buildings on Wilshire Boulevard which include similar mid-rise office buildings in proximity of transit and along corridors.
6. Enhance the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area.

3. Overview of Alternatives Selected for Analysis

As stated above, the intent of the alternatives analysis is to determine if there are feasible alternatives that would avoid or substantially reduce the significant impacts of a proposed project. Based on the analysis in **Chapter IV, *Environmental Impact Analysis***, of this Draft EIR, implementation of the Project would result in significant construction impacts that cannot be feasibly mitigated with regard to construction noise and construction groundborne vibration as it relates to human annoyance from on-site construction activities. The Project would not result in any significant operational impacts. The following alternatives to the Project have been selected to inform evaluation of the Project in light of the significant environmental impacts of the Project, the objectives established for the Project (listed above), the feasibility of the alternatives considered, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Development under Existing Zoning Alternative
- Alternative 3: Reduced Square Footage Alternative
- Alternative 4: Residential Mixed-Use Alternative

Alternative 1 is a No Project/No Build Alternative pursuant to CEQA Guidelines Section 15126.6(e). Under the No Project/No Build Alternative, the Project would not be developed and existing on-site uses would remain as under the existing conditions.

In addition to the No Project/No Build Alternative, three development alternatives are included for analysis in this Draft EIR. Two alternatives (Alternatives 2 and 3) would limit the amount of development and density to reduce the floor area ratio (FAR) as compared to the Project's FAR of 4.5:1. Another alternative (Alternative 4) would consist of an equivalent FAR as compared to the Project but would provide a residential mixed-use development as compared to the Project's medical office and commercial uses. The four alternatives, including the No Project/No Build Alternative, are listed below and described in more detail in this chapter. The alternatives considered for evaluation are compared to the Project, as summarized in **Table V-1, *Overview of the Project Alternatives***.

**TABLE V-1
OVERVIEW OF THE ANALYZED ALTERNATIVES**

Use or Feature	Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Square Footage	Alternative 4: Residential Mixed-Use
Maximum Building Heights (including architectural elements)	12 stories 230 feet	Same as existing (no change)	3 stories 45 feet	9 stories 180 feet	12 stories 191 feet
Medical Office Floor Area	140,305 sf	0 sf	46,768 sf	105,229 sf	N/A
Retail-Commercial Floor Area	5,000 sf	0 sf	1,666 sf	3,750 sf	5,000 sf
Residential Units	N/A	N/A	N/A	N/A	80 du (140,305 sf)
Total Open Space	4,643 sf ^a	0 sf	0 sf	0 sf	10,000 sf
Excavation Depth	30 feet bgs (for footings)	N/A	30 feet bgs (to accommodate two subterranean parking levels)	30 feet bgs (for footings)	30 feet bgs (for footings)
Parking Spaces Required	418 spaces ^b	0 spaces	169 spaces ^c	313 spaces ^b	285 spaces
Parking Spaces Provided	418 spaces	0 spaces	169 spaces	313 spaces	285 spaces
Total New Floor Area	145,305 sf	0 sf	48,435 sf	108,979 sf	145,305 sf
FAR	4.5:1	0	1.5:1	3.4:1	4.5:1

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<p>sf = square feet du = dwelling unit bgs = below ground surface FAR = Floor Area Ratio</p> <p>^a Note that open space is not required for commercial uses, such as the Project.</p> <p>^b Pursuant to Los Angeles Municipal Code (LAMC) Section 12.21 A.4(c), the combination of medical office and retail-restaurant uses would require a total of 746 vehicle parking spaces. Pursuant to LAMC Section 12.32 P, the Project is requesting a reduction in parking not to exceed 20 percent, incident to a legislative action, reducing the required vehicle parking to a total of 597 spaces. As required by LAMC Section 12.21 A.16, the project would be required to provide 15 bicycle parking spaces. However, pursuant to LAMC Section 12.21 A.4(c), non-residential projects within a TPA may replace up to 30 percent of the required automobile parking spaces, or a reduction of 179 vehicle parking spaces, with bicycle parking at a rate of four bicycle parking spaces per vehicle parking space, thereby, further reducing the required vehicle parking spaces by 179 spaces to 418 spaces, in exchange for providing 716 bicycle parking spaces. Alternative 3 accounts for both permitted vehicle parking reductions pursuant to LAMC Section 12.21 A.4(c) and LAMC Section 12.32 P.</p> <p>^c Permitted vehicle parking reductions pursuant to LAMC Section 12.21 A.4(c) is similarly accounted for Alternative 2.</p>					

4. Alternatives Considered and Rejected as Infeasible

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

a) Alternative Off-Site Location

According to the guidance provided by CEQA Guidelines Section 15126.6(f)(2), one or more alternative location(s) for a proposed project should be considered if placing the proposed project in the alternative location would avoid or substantially lessen any of the significant effects of the project to be avoided or substantially lessened; if the EIR concludes that no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion. The factors that may be considered when addressing the feasibility of an alternative site are suitability, economic viability, availability of infrastructure, general plan consistency, and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site.

The approximately 0.76-acre (33,087 square feet, 32,290 net square feet) site is located within a Transit Priority Area (TPA) at the intersection of South San Vicente Boulevard and Wilshire Boulevard. Objectives of the Project include encouraging economic growth in the community; redeveloping the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities; incorporating sustainable and green building design and construction that exceed building code and Title 24 requirements; developing the Project Site with a well-designed commercial and medical office project within a TPA; construction a medical office building at an intensity consistent with the zoning for commercial buildings on Wilshire Boulevard; and enhancing the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area. Considering these objectives, the Applicant does not own such a property and it is not anticipated that the Applicant would be able to find an equivalent-sized building site with similar proximity to the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station.

With regard to the Project's significant and unavoidable construction noise and vibration impacts at nearby residential uses (noise and vibration sensitive receptors), the proximity of residential uses, which include two-story apartment buildings across the adjacent alley to the north of the Project Site in an area also characterized with mid- to high-rise commercial buildings, to the northwest and southeast, would also be expected at alternative locations within a TPA suitable for the Project's scale and density. As such, it is expected that the Project's construction noise and vibration impacts on sensitive receptors would be similar to those of the Project at alternative sites.

Therefore, because of the improbability of finding an equivalent site that could meet the Project's objectives, it is not expected that the acquisition of an equivalent off-site location would be feasible. Also, because of the objective to develop commercial and medical office uses within a TPA to maximize the benefit of nearby Metro bus lines, AVTA bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station, it is expected that an alternative location that meets this objective would also be near other residential uses and, thus, result in similar significant construction noise and vibration impacts as under the Project. It is not expected that an alternative location would avoid or reduce these construction noise and vibration impacts to a less-than-significant level. Therefore, the development of the Project at an off-site location would not be feasible based on CEQA criteria and is not considered further in this chapter as a Project alternative.

b) Alternatives to Eliminate Significant Noise and Vibration Impacts during Construction

As discussed in **Section IV.G, Noise**, of this Draft EIR, the Project would result in short-term significant and unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant and unavoidable construction-related noise impacts related to Project-level on-site construction activities and cumulative on-site and off-site construction activities, and significant and unavoidable vibration (human annoyance) impacts related to Project-level on-site construction activities. Alternatives, including those that would reduce construction duration or Project scale/intensity, were considered to substantially reduce or avoid these significant and unavoidable impacts. Based on the thresholds upon which the construction noise and vibration analysis is based, a substantial reduction in the intensity of construction activities would be necessary to reduce construction-related impacts to a less-than-significant level. In addition, significant construction noise and vibration impacts within the Project Site would be expected to occur with most reduced development scenarios because construction activities, and the need to grade the Project Site, are inherently disturbing. Thus, reducing temporary construction noise and vibration impacts below a level of significance at adjacent uses would not be possible while still achieving the Project's objectives.

Furthermore, any reduction in the intensity of construction activities would instead increase the overall duration of the construction period. Therefore, alternatives to eliminate the Project's short-term noise and vibration impacts during construction were rejected as infeasible based on the inability to avoid significant environmental impacts under a reasonable construction schedule.

5. Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. Each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified above, would be substantially attained by the alternative. The evaluation of each of the alternatives follows the process described below:

- A description of the alternative.
- The net environmental impacts of the alternative before and after implementation of reasonable mitigation measures for each environmental topic area analyzed in **Chapter IV, Environmental Impact Analysis**, of this Draft EIR, are described. Where appropriate, the evaluation is divided between temporary impacts that would occur during the alternative project's construction phase and operational phases.
- Environmental impacts of each alternative as compared to the Project are identified for each environmental topic area addressed in this Draft EIR. Where the impact of the alternative would be clearly less than the impact of the Project, the comparative impact is said to be "less than the Project." Where the alternative's impact would clearly be more than the Project, the comparative impact is said to be "greater than the Project." Where the impacts of the alternative and the Project would be roughly equivalent, the comparative impact is said to be "similar to the Project." The evaluation also documents whether an impact would be entirely avoided, whether a significant impact could be reduced to a less-than-significant level, or whether a significant unavoidable impact could be reduced to a less-than-significant level when compared to the Project.
- The comparative analysis of the impacts is followed by a general discussion of the extent to which the underlying purpose and Project objectives are attained by the alternative.

At the end of this chapter, a relative comparison of each alternative's impacts and their ability to achieve Project objectives is provided. Additionally, pursuant to CEQA Guidelines Section 15126.6(e)(2), an "Environmentally Superior Alternative" is identified.

6. Alternatives Analysis

a) Alternative 1: No Project/No Build Alternative

(1) Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative (Alternative 1) for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, “in certain instances, Alternative 1 means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1 assumes that no new development would occur within the Project Site. The vacant educational building on the Project Site is assumed to continue to be vacant under this scenario and the Big 5 Sporting Goods store located on the Project Site would continue to operate as under existing conditions.

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

Alternative 1 would not involve any new construction or change current activities on the Project Site. Because new development would not occur, Alternative 1 would not generate new emissions or cause the Air Basin’s criteria pollutant emissions to worsen so as to impede the objectives of the Air Quality Management Plan (AQMP). Therefore, because Alternative 1 would not result in any new emissions generation, no air quality impacts would occur, and impacts would be less than the Project’s less-than-significant impacts.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

Alternative 1 would not involve construction or generate any new criteria pollutants. Accordingly, Alternative 1 would not generate any construction emissions. Therefore, no construction air quality thresholds impacts under Alternative 1 would occur, and impacts would be less than the Project’s less-than-significant impacts.

(b) Operation

Alternative 1 would not result in any new emissions over existing conditions. Accordingly, Alternative 1 would not involve any new operational activities. Therefore, no operational air quality thresholds impacts under Alternative 1 would occur, and impacts would be less than the Project’s less-than-significant impacts.

(iii) *Sensitive Receptors*

(a) *Localized Emissions*

Alternative 1 would not involve any construction or increased activity at the Project Site compared to existing conditions. Therefore, Alternative 1 would not generate any emissions that would exceed the localized screening indicators for nitrogen oxides (NO_x), carbon monoxide (CO), inhalable particles with diameters that are generally 10 micrometers (µm) and smaller (PM₁₀) and fine inhalable particles with diameters that are generally 2.5 µm and smaller (PM_{2.5}), including at the nearest receptors located 15 feet (five meters) to the northeast of the Project Site. Therefore, localized emission impacts under Alternative 1 would be less than significant, and less than the Project's less-than-significant impacts with incorporated mitigation.

(b) *Carbon Monoxide Hotspots*

Alternative 1 would not increase traffic or other activity at the Project Site that would increase CO levels compared to existing conditions. Accordingly, Alternative 1 would not generate traffic that would exceed the numerical indicators of significance for CO hotspots. Therefore, CO hotspots impacts under Alternative 1 would be less than significant, and less than the Project's less-than-significant impacts.

(c) *Toxic Air Contaminants*

(i) *Construction*

Alternative 1 would not involve any construction or new development at the Project Site that would generate toxic air contaminants (TACs). Accordingly, no construction activities would occur under Alternative 1. Therefore, no construction TAC impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts with incorporated mitigation.

(ii) *Operation*

No new development would occur under Alternative 1 that would generate TAC emissions. Accordingly, Alternative 1 would not result in any new occupancy of the Project Site or operation emissions. Therefore, no operational TAC impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(b) *Cultural Resources*

(i) *Historical Resources*

Alternative 1 would not change conditions on the Project Site. Accordingly, Alternative 1 would not directly or indirectly affect existing historical resources. Therefore, no impacts on historical resources would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(ii) *Archaeological Resources*

Alternative 1 would not require any excavation activities that would potentially encounter previously undiscovered archaeological resources. Therefore, no potential impacts on archaeological resources would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts with incorporated mitigation.

(c) *Energy*

(i) *Efficient Energy Consumption*

Alternative 1 would not involve any changes at the Project Site that would generate an increase in demand for energy over existing uses during construction or operation. Therefore, no efficient energy consumption impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(ii) *Conflict with Plans for Renewable Energy or Energy Efficiency*

Alternative 1 would not be subject to review pursuant to plans for renewable energy and energy efficiency. Therefore, no impact regarding conflicting with plans would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(d) *Geology and Soils*

(i) *Liquefaction*

Alternative 1 would not require any new development at the Project Site or increase or change exposure to existing environmental conditions, such as liquefaction. Accordingly, because Alternative 1 would not require any new development or earthwork, it would not change existing exposure to geologic conditions. Therefore, no liquefaction impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(ii) *Unstable Geologic Units*

Alternative 1 would not include any new development that would expose more people or structures to unstable geologic units, such as landslides, lateral spreading, subsidence, liquefaction, or collapse. Therefore, no unstable geologic units impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(iii) *Expansive Soils*

Alternative 1 would not include any new development that would expose more people or structures to geologic hazards, such as expansive soils. Therefore, no

expansive soils impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(iv) *Paleontological Resources*

Alternative 1 would not require any excavation activities; as such, it would have no potential to encounter previously undiscovered paleontological resources. Therefore, no impacts on paleontological resources would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts with incorporated mitigation.

(e) *Greenhouse Gas Emissions*

Alternative 1 would not include construction of any new buildings, higher occupancy of the Project Site, or other activity that would generate new greenhouse gas (GHG) emissions. Therefore, no GHG emissions impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(f) *Land Use and Planning*

Alternative 1 would not change the existing land use and occupancy of the Project Site. The existing vacant educational building and Big 5 Sporting Goods store on the Project Site would remain. Because no changes would occur on the Project Site, Alternative 1 would not conflict with any City and regional plans and policies related to avoiding or reducing environmental impacts and no impacts would occur. However, unlike the Project, this alternative would not further regional and local policies to enhance pedestrian activity or increase transit use. Nevertheless, no land use and planning impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(g) *Noise*

(i) *Noise Levels in Excess of Standards*

(a) *Construction*

Alternative 1 would not involve any construction activities, and, therefore, it would have no construction noise impacts. Accordingly, Alternative 1 would avoid the exceedance of the noise threshold and eliminate the corresponding significant and unavoidable construction noise impact. Therefore, no construction noise impacts would occur under Alternative 1, and impacts would be less than the Project's significant and unavoidable impacts.

(b) *Operation*

Occupancy and activity at the Project Site would not change under Alternative 1, and no new noise impacts would be generated. Accordingly, Alternative 1 would involve no additional noise associated with the use of the Project Site or generate

off-site traffic noise. Therefore, no operational noise impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(ii) *Groundborne Vibration*

(a) *Construction*

Alternative 1 would not involve any new development or construction and, therefore, would not generate any vibration impacts. Accordingly, Alternative 1 would not involve any construction activity and would avoid the Project's significant and unavoidable human annoyance impacts. Therefore, no construction vibration impacts would occur under Alternative 1, and impacts would be less than the Project's significant and unavoidable impacts.

(b) *Operation*

Occupancy and activity at the Project Site would not change under Alternative 1, and no new structural vibration and human annoyance impacts as it relates to groundborne vibration would be generated. Therefore, no operational vibration and human annoyance impacts would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(h) *Public Services*

(i) *Fire Protection*

Alternative 1 would not cause any changes in activity or occupancy of the Project Site that would increase demand for fire protection and no impacts would occur. Therefore, no fire protection impacts under Alternative 1 would occur, and impacts would be less than the Project's less-than-significant impacts.

(ii) *Police Protection*

Alternative 1 would not change existing conditions or increase the level of activity at the Project Site and, therefore, would not alter demand for police protection services or affect emergency response times. Therefore, no police protection impacts under Alternative 1 would occur, and impacts would be less than the Project's less-than-significant impacts.

(i) *Transportation*

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

Alternative 1 would not involve any new development and, as such, would not conflict with or implement any objectives related to the circulation system, transit, roadways, or bicycle and pedestrian facilities, including those of Mobility Plan 2035, the City of Los Angeles Complete Streets Design Guide, and Wilshire Community Plan. As such, Alternative 1 would neither implement nor conflict with any such objectives. Therefore, no impacts related to consistency with programs, plans, ordinances or policies addressing the circulation system would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

Alternative 1 would not result in an increase in the intensity of on-site development and, thus, would result in no additional vehicle miles traveled (VMT) over existing conditions as required under CEQA Guidelines Section 15064.3(b). Therefore, no VMT impacts under Alternative 1 would occur, and impacts would be less than the Project's less-than-significant impacts.

(j) *Tribal Cultural Resources*

Alternative 1 would not change existing conditions or cause any impact with respect to tribal cultural resources. Accordingly, Alternative 1 would not involve any disturbance to the Project Site. Therefore, no impacts related to tribal cultural resources would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impacts.

(3) **Relationship of the Alternative to Project Objectives**

As described above, Alternative 1 assumes that no new development would occur on the Project Site. The on-site uses would continue to operate similar to existing conditions. As Alternative 1 would not include a development program, it would not contribute to growth and development within the Wilshire Community Plan area, and, therefore, it would not achieve any of the Project objectives. The relationship of Alternative 1 to the Project objectives is presented in **Table V-2, Ability of Alternatives to Meet Project Objectives**, at the end of this chapter.

b) Alternative 2: Development Under Existing Zoning

(1) Description of the Alternative

With Development under the Existing Zoning Alternative (Alternative 2), the Project Site would be developed in accordance with the existing C1-1VL-O (Limited Commercial, Height District 1VL, Oil Drilling District) zoning. The C1 Zone generally permits commercial and retail uses. The “1VL” indicates Height District 1VL, which is a Very Limited Height District. In conjunction with the C1 Zone, Height District 1VL allows for three stories and 45 feet in height, and a maximum FAR of 1.5:1. The “O” designation identifies the City’s Oil Drilling (O) district, which is designated for areas where drilling of oil wells or the production from the wells of oil, gasses or hydrocarbon substances is permitted. Similar to the Project, this alternative would include medical office uses and commercial uses.

Alternative 2 would develop a total of 48,435 square feet of floor area on the Project Site compared to the Project’s proposed 145,305 square feet, for a 67 percent reduction in floor area. Alternative 2’s floor area would be comprised of 46,768 square feet of medical office uses and 1,666 square feet of ground floor retail-commercial uses. Consistent with the 1VL Height District, the proposed building under Alternative 2 would be three stories (45 feet in height), a reduction from the 12 stories (218 feet in height) as proposed under the Project. There would be no open space in Alternative 2; therefore, total open space provided by Alternative 2 would be less than the total open space provided by the Project.

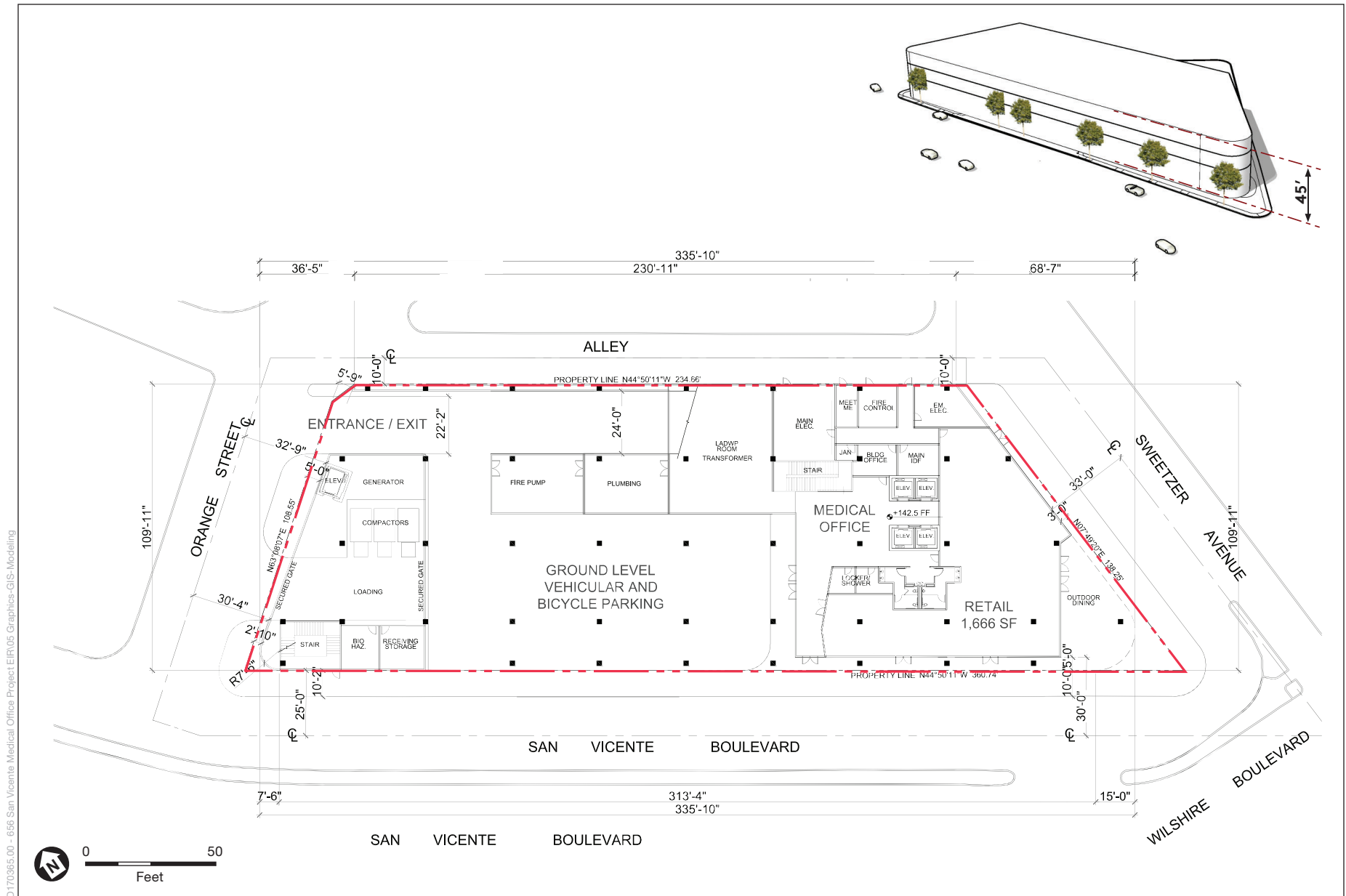
Due to the 1VL Height District , which restricts the proposed building under Alternative 2 to three stories (45 feet in height), the vehicle parking spaces would be provided in two subterranean parking levels and one ground-level parking area with double height stackers and full valet service. As an existing groundwater channel is located within 20 feet below ground surface of the Project Site, the subterranean parking would require relocation of this existing underground groundwater channel. Pursuant to LAMC Section 12.21 A.4(c), the combination of medical office and retail-restaurant uses would require a total of 249 vehicle parking spaces. However, similar to the Project, the vehicular parking does account for a permitted reduction pursuant to Los Angeles Municipal Code (LAMC) Section 12.21 A.4(c), and a total of 169 vehicle parking spaces would be provided under Alternative 2. This is a reduction from the 418 vehicle parking spaces provided under the Project. As it related to bicycle parking spaces, 300 short-term and long-term bicycle parking spaces would be provided on the ground level and roof under Alternative 2, a reduction from the 716 short-term and long-term bicycle parking spaces provided under the Project.

Unlike the Project, Alternative 2 would not provide a visitor drop-off and valet area. Rather, all ingress and egress for visitor and employee vehicles to access the

subterranean and ground-level parking would be provided via a driveway along Orange Street. A loading dock serving the medical office and retail/commercial uses would be located and accessed from Orange Street. No vehicular access would be provided through the alley. Pedestrian access to the retail-commercial uses would continue to be provided from South Sweetzer Avenue and the frontage road of South San Vicente Boulevard. Access to the medical office uses would continue to be provided from the ground level lobby for the office building along the frontage road of South San Vicente Boulevard and from the parking levels via internal stairs and elevators.

As with the Project, Alternative 2 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. With reduced density and square footage, the overall length and intensity of construction would be less than that of the Project. However, construction of Alternative 2 would require more excavation as subterranean parking would be required to accommodate a portion of the vehicle parking spaces provided under this alternative, and the existing subterranean groundwater channel must be relocated.

Figure V-1, *Site Plan and Building Massing for Alternative 2*, provides a site plan and building massing proposed for Alternative 2 as described above.



SOURCE: ZGF Architects, 2020

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Figure V-1
Site Plan and Building Massing for Alternative 2

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

Similar to the Project, Alternative 2 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 2 would be consistent with the growth projections in the 2016 AQMP, since the growth would occur in a High Quality Transit Area (HQTa). As with the Project, Alternative 2 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 2 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Wilshire Community Plan area. The location of Alternative 2 would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. For all of these reasons, impacts under Alternative 2 with respect to consistency with air quality management plans would be less than significant and similar to the Project's less-than-significant impacts.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, construction of Alternative 2 has the potential to generate temporary regional criteria pollutant emissions through the operation of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities such as the application of paint and other surface coatings. It is assumed that while the grading/excavation phase would be extended for the subterranean parking levels assumed under Alternative 2 and relocation of the existing subterranean groundwater channel, as the square footage and building height would be significantly reduced, the building construction phase would also be reduced, thus reducing the overall construction duration of the alternative. The maximum emissions under Alternative 2 would be similar to the Project, because emission levels are based on a single day in which maximum construction activity would occur. As with the Project, Alternative 2 would comply with South Coast Air Quality Management District (SCAQMD) Rule 403 (Control of Fugitive Dust) and SCAQMD Rule 1113 (Architectural Coatings). Similar to the Project, construction emissions under Alternative 2 would not exceed SCAQMD numerical significance thresholds for volatile organic compound (VOC), NO_x, CO, sulfur oxide (SO_x), PM₁₀, and PM_{2.5}. Thus, as with the Project, impacts during construction would be less than significant under Alternative 2 for these criteria pollutants. While more

excavation would be required under Alternative 2, with reduced density and square footage, the overall length and intensity of construction would be less than that of the Project. As Alternative 2 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project's less-than-significant impacts.

(b) Operation

During operation, Alternative 2 would generate regional criteria pollutant emissions through mobile sources such as vehicle trips from patrons and employees and delivery trucks traveling to and from the Project Site, and through area (consumer products, architectural coatings, and landscaping) and energy sources (natural gas). Similar to the Project, Alternative 2 would comply with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Also, mobile sources emissions would be reduced under Alternative 2 compared to the Project due to the reduction in traffic trips. Similar to the Project, operational emissions under Alternative 2 would not exceed SCAQMD numerical significance thresholds for VOC, CO, SO_x, PM₁₀, and PM_{2.5} and emissions related to air quality standards would be less than significant. As Alternative 2 would be developed at a lower intensity and have less traffic than the Project, impacts under Alternative 2 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project's less-than-significant impacts.

(iii) Sensitive Receptors

(a) Localized Emissions

(i) Construction

As with the Project, Alternative 2 would generate construction activity and an increase in localized emission levels. It can be expected that maximum daily localized construction emissions would be similar to the Project. As with the Project, maximum localized construction emissions would be below the localized screening thresholds for all analyzed criteria pollutants except PM_{2.5}. Similar to the Project, with incorporation of Mitigation Measure AIR-MM-1, which would require the use of diesel-powered construction equipment that meet United States Environmental Protection Agency (USEPA) Tier 4 Final off-road emissions standards, localized construction emissions would be reduced to below the significance thresholds and impacts would be mitigated to less than significant. Therefore, similar to the Project, with respect to localized construction, impacts to sensitive receptors would be less than significant under Alternative 2 with implementation of mitigation. While more excavation would be required under Alternative 2, Alternative 2 would reduce the duration of construction. The reduction in construction would reduce the duration of localized emissions during construction. Accordingly, impacts under Alternative 2 with respect to localized

emissions during construction would be less than the Project's less-than-significant impacts with incorporated mitigation.

(ii) *Operation*

As with the Project, Alternative 2 would generate an increase in localized emission levels during operation due to consumer product usage, architectural coatings usage, energy usage, emergency generator usage, and charbroiler usage. Because of its smaller scale and intensity, localized operational emissions under Alternative 2 would be less than the Project. As with the Project, maximum localized operational emissions at sensitive receptors would be below the localized screening thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, similar to the Project, with respect to localized operation emissions, impacts to sensitive receptors would be less than significant under Alternative 2. Alternative 2 would reduce the scale and building floor area compared to the Project. The reduction in building floor area and reduced occupancy of the Project Site under Alternative 2 would reduce daily operational localized emissions from less consumer product usage, architectural coatings usage, and building energy demand, as well as a smaller emergency generator and charbroiler usage. Accordingly, impacts under Alternative 2 with respect to localized emissions would be less than the Project's less-than-significant impacts.

(b) *Carbon Monoxide Hotspots*

Vehicle trips would be less under Alternative 2 than the Project. As such, as with the Project, Alternative 2 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. As Alternative 2 would reduce the Project's daily vehicle trips, impacts would be less than the Project's less-than-significant impacts.

(c) *Toxic Air Contaminants*

(i) *Construction*

Under Alternative 2, as with the Project, temporary TAC emissions associated with diesel particulate matter (DPM) emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective California Air Resources Board (CARB) and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. As with the Project, with implementation of the required mitigation, Alternative 2 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. While more excavation would be required under Alternative 2, Alternative 2 would reduce the duration of construction activities; as such, impacts under Alternative 2 would be less than the Project's less-than-significant impacts with incorporated mitigation.

(ii) *Operation*

Alternative 2, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling activities associated with the potential restaurant uses and consumer products associated with re-applying architectural coatings and cleaning building surfaces. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, under Alternative 2, as with the Project, it is anticipated that one emergency generator would be implemented onsite, which would be required to comply with SCAQMD's Rule 1470 (Requirements For Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) and the emergency generator would be certified to the most stringent CARB and USEPA Tier 4 emissions standards, and emissions minimized to the lowest technically feasible level for equipment of this size and type. Compliance with Rule 1470 and the Tier 4 standards would ensure the TAC emissions from the emergency generator installed onsite would not cause or contribute to adverse health impacts at nearby sensitive receptors. With respect to the use of consumer products and architectural coatings, the medical office and retail/restaurant uses associated with Alternative 2 would be expected to generate minimal emissions from these sources. The Alternative 2's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 2 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 2, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. However, because of Alternative 2's reduced overall scale of development and reduction in use of consumer products and other sources, such as architectural coatings, impacts under Alternative 2 would be less than the Project's less-than-significant impacts.

(b) *Cultural Resources*

(i) *Historical Resources*

As with the Project, Alternative 2 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. Both buildings are not considered a historical resource pursuant to CEQA. In addition, the vacant educational building does not qualify as a contributor to a potential historic district. Furthermore, the Project Site is not situated in a designated or previously evaluated historic district. As with the Project, even though construction of Alternative 2 would alter the low-rise setting

of the Project Site, the setting of the Project Site has already been substantially altered by large-scale infill construction and redevelopment, and Alternative 2 is situated at enough of a distance from the historical resources so as not to cause any material impairment or substantial visual impact. After project completion, historical resources in the vicinity of the Project Site would retain their existing eligibility and visibility within the urban environment. Therefore, impacts under Alternative 2 with respect to historical resources would be less than significant and similar to the Project's less-than-significant impacts.

(ii) *Archaeological Resources*

Excavation associated with Alternative 2 would reach depths of approximately 30 feet to accommodate two subterranean parking levels and relocation of the underground groundwater channel, whereas excavation associated with Project would also reach depths of approximately 30 feet, but would require less earth movement as excavation would only be for building footings. Similar to the Project, excavation under Alternative 2 could have the potential to disturb existing or undiscovered archaeological resources. Disturbance or destruction of these resources could constitute a significant impact. As with the Project, Alternative 2 would also implement Mitigation Measures CUL-MM-1 through CUL-MM-3, which require archaeological monitoring, treatment of unanticipated discoveries, and reporting, would ensure that potentially significant impacts to archaeological resources are reduced to a less-than-significant level. Under Alternative 2, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level. However, because Alternative 2 would involve more earth movement, it would have a greater potential impact on such resources. Thus, impacts related to archaeological resources under Alternative 2 would be greater than the Project's less-than-significant impacts with incorporated mitigation.

(c) *Energy*

(i) *Efficient Energy Consumption*

During construction of Alternative 2, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction of Alternative 2 would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction workers travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). With regard to construction, while Alternative 2 would require more excavation for subterranean parking, overall Alternative 2 would have a reduced density and square footage as compared to the Project. As such, the overall length and intensity of construction would be less than that of the Project. A shorter construction length would mean less overall electricity and transportation energy

usage during construction. Construction equipment would comply with federal, State, and regional requirements where applicable. In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

During operation of Alternative 2, energy would be consumed for multiple purposes, including, but not limited to, HVAC; refrigeration; lighting; and the use of electronics, equipment, and appliances. Energy would also be consumed during operation of Alternative 2 related to water usage, solid waste disposal, and vehicle trips. As with the Project, Alternative 2 would comply with existing minimum energy efficiency requirements such as the 2019 Title 24 standards and applicable 2019 California Green Building Standards (CALGreen) requirements. In addition, similar to the Project, the design of Alternative 2 and its characteristics would be consistent with and would not conflict with the goals of the SCAG Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020–2045 RTP/SCS). In particular, Alternative 2 includes a mixed-use design and increase in density, which is located on an infill site within an HQTa and in close proximity to existing high-quality transit including the future Wilshire/La Cienega Metro D (Purple) Line Station in 2023 and multiple Metro bus routes; its proximity to existing restaurant, office, retail, entertainment, and residential land uses; and its highly walkable environment support the conclusion that Alternative 2 has been properly designed and located so that its development would achieve a reduction in VMT greater than the regional and Statewide averages.

Section IV.C, *Energy*, of this Draft EIR concludes that the Project's energy requirements would not substantially affect local and regional supplies or capacity during construction or operation, and that the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With its reduction in floor area of approximately 67 percent compared to the Project, Alternative 2 would generate a lower level of energy demand than would the Project. Thus, impacts related to efficient energy consumption as with the Project would be less than significant and, because the scale of development would be less, impacts with respect to energy consumption would be less than the Project's less-than-significant impacts.

(ii) *Conflict with Plans for Renewable Energy or Energy Efficiency*

As with the Project, Alternative 2 is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Code, which have been incorporated into the Los Angeles Green Building Code as amended by the City, to be more stringent than State requirements in LAMC Chapter 9, Article 9, Los Angeles Green Building Code. In addition, Alternative 2's land use characteristics indicate that Alternative 2 has been properly designed and located so that its development would achieve a reduction in VMT greater than the regional and Statewide averages.

Based on the above, Alternative 2 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As with the Project, the impact of Alternative 2 with respect to compliance with renewable energy and energy efficiency would be less than significant. As Alternative 2 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 2 would be similar to the Project's less-than-significant impacts.

(d) *Geology and Soils*

(i) *Liquefaction*

Alternative 2 would be built within the same boundaries of the Project Site, which include soils potentially susceptible to liquefaction. As with the Project, Alternative 2 would require a deepened foundation system that consists of drilled friction piles, or equivalent foundation system that would be embedded a minimum of 10 feet into the bedrock, which is located 30 feet below ground surface in accordance with the City's building code requirements. Under this design of the deepened foundation system, the friction piles would extend through the potentially liquefiable soil layers and, as such, would not subject the proposed building to liquefaction. Alternative 2 would also comply with LAMC Section 91.7006, which would require this alternative to provide a final, site-specific Geotechnical Report that would include the preliminary recommendations for the Geotechnical Report as well as the final recommendations from the report that would be enforced by the Los Angeles Department of Building and Safety (LADBS). As with the Project, through implementation of mitigation measures and adherence to the California Building Code (CBC) and the recommendations of the Final Geotechnical Report, impacts with respect to liquefaction under Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(ii) *Unstable Geologic Units*

Excavation under Alternative 2, as with the Project, would cause disturbance of existing soils and could contribute to potential localized raveling or caving of excavated areas (e.g., the excavated side walls losing stability). All required excavations would be sloped and properly shored in accordance with the applicable provisions of the CBC incorporated into the City's Building Code to minimize the potential for site stability hazards during temporary excavation activities. In addition, Alternative 2 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulatory requirements. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(iii) *Expansive Soils*

Alternative 2 would be built within the same boundaries of the Project Site, which include soils that have a moderate potential for expansion. However, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, compliance with standard construction and engineering practices (i.e., on-site excavation requiring suitable engineered stabilization in accordance with the CBC and proper engineering erosion control and proper engineering drainage design), addressing expansive soils and building code regulations pertinent to foundation stability would ensure that expansive soils are removed, as necessary. As such, as with the Project, impacts related to expansive soils under Alternative 2 would be less than significant and similar to the Project's less-than-significant.

(iv) *Paleontological Resources*

Excavation associated with Alternative 2 would reach depths of approximately 30 feet to accommodate two subterranean parking levels and relocation of the underground groundwater channel, whereas excavation associated with Project would also reach depths of approximately 30 feet, but would require less earth movement as excavation would only be for building footings. Similar to the Project, excavation under Alternative 2 could have the potential to directly or indirectly destroy a unique paleontological resource not identified in the analysis conducted for the Project Site and, as such, could result in a potentially significant impact. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 2 would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources

to less than significant. However, because earth movement under Alternative 2 would be greater, impacts related to paleontological resources would be greater than the Project's less-than-significant impacts with incorporated mitigation.

(e) *Greenhouse Gas Emissions*

The construction and operation of the Project Site under Alternative 2, as with the Project, would increase GHG emissions. The smaller scale and lower mobile emissions associated with Alternative 2 would generate lower GHG emissions than the Project's maximum GHG operational emissions. As with the Project, Alternative 2 would incorporate applicable project design features, including Project Design Feature TRAF-PDF-1, which would encourage residents and employees of the Project to utilize alternative modes of travel by providing bicycle and pedestrian amenities, promoting alternative transportation modes, supporting carpools and rideshares, and implementing an employee parking management program. GHG emission impacts under Alternative 2, as with the Project, would be less than significant. Due to its lower GHG emissions, under Alternative 2 with respect to GHG emissions, impacts on the environment would be less than the Project's less-than-significant impacts.

Alternative 2, as with the Project, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS, L.A.'s Green New Deal (Sustainability pLAn 2019), and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 2. As discussed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR, the results of the analysis show that with the Project, the employee VMT per capita would be 7.5 compared to the threshold of 7.6. As shown in the Alternatives Transportation Analysis Memo, provided in Appendix L of this Draft EIR, the uses proposed under Alternative 2 would similarly generate an employee VMT per capita of 7.5. As such, because Alternative 2 would result in a similar VMT rate and would not conflict with applicable GHG plans, similar to the Project, impacts under Alternative 2 with respect to conflicts with GHG plans adopted for the purpose of reducing the emissions of GHGs would be less than significant. As the smaller scale and lower mobile emissions associated with Alternative 2 would generate lower GHG emissions than the Project's maximum GHG operational emissions, impacts related to GHG emissions would be less than the Project's less-than-significant impacts.

(f) *Land Use and Planning*

Alternative 2 proposes 48,435 square feet of medical office and ground floor retail-commercial uses, with an approximate FAR of 1.5:1. The FAR and uses would be consistent with the existing C1-1VL-O zoning for the Project Site. Conversely, the Project proposes up to 145,305 square feet of medical office and ground floor

retail-commercial uses with an approximate FAR of 4.5:1. Alternative 2 would require full valet parking and double height stackers on the first floor. Alternative 2 would not require the Project's proposed amended zoning to (Q)C2-2D-O and a General Plan Amendment from Limited Commercial to Regional Center Commercial to allow for the Project's proposed building height and floor area.

As with the Project, the density and location of Alternative 2 would not conflict with policies of regional and local land use plans adopted to avoid or mitigate environmental effects, including SCAG's 2020–2045 RTP/SCS, City of Los Angeles General Plan Framework Element, Wilshire Community Plan, or LAMC, and, as such, impacts with respect to land use would be less than significant. As no changes in zoning or land use designations would be required under Alternative 2, impacts in relation to existing plans that avoid or reduce environmental impacts would be less than the Project's less-than-significant impacts.

(g) *Noise*

(i) *Noise Levels in Excess of Standards*

(a) *Construction*

Construction activities under Alternative 2 would be similar to those of the Project and would generally include site demolition, site preparation, grading/excavation, drainage/utilities/trenching, building construction, foundation concrete pour, architectural coating, and paving. Similar to the Project, maximum construction activities under Alternative 2 would increase noise levels at several sensitive receptor locations in the vicinity of the Project Site. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 2 would be the same as the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 through NOI-MM-4 would be implemented under Alternative 2 to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors would still exceed the significance threshold. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 2. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater than five A-weighted decibels [dBA] equivalent sound level [L_{eq}]) compared to existing traffic noise levels along any of the studied roadway segments, and impacts would be

less than significant. Although Alternative 2 would involve more earth movement due to the proposed two levels of subterranean parking, the overall length and intensity of construction would be less than that of the Project. Therefore, the duration of construction noise exceedance levels would be shorter. As such, impacts related to construction noise under Alternative 2 would be less than the Project's significant and unavoidable impacts.

(b) Operation

Alternative 2, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, outdoor spaces, parking facilities, loading docks and refuse collection, and emergency generators. However, Alternative 2 would involve a smaller scale project with fewer overall off-site vehicle trips. Therefore, operational mobile source noise impacts would be incrementally less under Alternative 2 than the Project. As the Project would not exceed the significance thresholds for off-site traffic noise, off-site traffic noise impacts under Alternative 2 would also not exceed any significance thresholds and impacts would be less than significant.

With a decrease in square footage of medical office and ground floor retail-commercial uses compared to the Project, operational noise levels from on-site operational noise would be incrementally less than the Project. Under Alternative 2, fixed mechanical equipment, loading docks and refuse collection, and emergency generators would be located in similar locations as the Project and would include similar enclosures. As with the Project, noise levels from these noise sources under Alternative 2 would be less significant. In addition, the reduced size of outdoor open spaces would result in a reduced size in occupant load of Project outdoor spaces and would incrementally reduce the noise generated by outdoor spaces. As the noise contribution from outdoor spaces would be minimal and impacts would be less than significant under the Project, outdoor noise generated under Alternative 2 would similarly be less than significant. Furthermore, parking under Alternative 2 would be provided in both subterranean and ground-level parking areas. As with the Project, these parking areas would be completely enclosed on all sides and, therefore, noise generated within the parking areas would be shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. Impacts from parking facilities under Alternative 2, as with the Project, would be less than significant. Overall, composite operational noise levels would be less than significant. Given the reduced number of vehicle trips and reduced outdoor noise sources under Alternative 2, impacts would be less than the Project's less-than-significant impacts.

(ii) *Groundborne Vibration*

(a) Construction

Construction of Alternative 2, as with the Project, would generate groundborne construction vibration from the operation of heavy equipment (e.g., backhoe,

dozer, excavators, drill rig, loader, scraper, and haul trucks). As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 2 would be below the structural damage significance criteria at off-site building structures. In addition, as with the Project, the structural damage vibration impacts from off-site construction traffic would also be below the structural damage significance criteria. Therefore, on-site and off-site vibration impacts pursuant to the significance criteria for building damage would be less than significant.

Regarding human annoyance, as with the Project, the estimated vibration levels due to construction equipment would exceed the vibration significance threshold for human annoyance at receptors V1, V3, and V4. Therefore, the on-site vibration impacts pursuant to the significance criteria for human annoyance during construction of Alternative 2 would be potentially significant. However, similar to the Project, there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors V1, V2, V3, V4 and V5. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 2. However, because the overall scale of development would be reduced by approximately 67 percent under Alternative 2, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 2 would be less than the Project's significant and unavoidable impacts.

(b) Operation

Day-to-day operations under Alternative 2, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 2, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 2 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 2 would be less than significant. As Alternative 2 would reduce the overall occupancy of the Project Site, off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 2, and, as such, impacts under Alternative 2 would be less than the Project's less-than-significant impacts.

(h) *Public Services*

(i) *Fire Protection*

Alternative 2, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. As with the Project, Alternative 2 would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to minimize disruptions to traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. As with the Project, Alternative 2 would also incorporate Project Design Feature TRAF-PDF-3, which would identify alternate parking location(s) and the method of transportation to and from the Project Site. The implementation of these project design features would facilitate emergency access. As such, similar to the Project, construction under Alternative 2 would result in less-than-significant impacts with respect to performance objectives for fire protection.

During operation, Alternative 2 would result in a net population increase of 156 employees. By comparison, the Project would result in a net population increase of 566 employees. Alternative 2, as with the Project, would comply with the applicable Federal Occupational Safety and Health Administrations (OSHA), Building Code, Fire Code, other LAMC, and Los Angeles Fire Department (LAFD) requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, as the Project Site is not located with the distance standards of an Engine Company or Truck Company, automatic fire sprinklers would be required to be installed under Alternative 2. However, as the Project Site is located within a highly urbanized area accessed via an established street system, impacts on emergency response would not be significant. Alternative 2, as with the Project, would also be consistent with LAMC fire flow requirements. As such, Alternative 2, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 2, as with the Project, would be less than significant. However, because Alternative 2 would reduce construction duration and Project Site occupancy (employees) compared to the Project, impacts related to fire protection services under Alternative 2 would be less than the Project's less-than-significant impacts.

(ii) *Police Protection*

Alternative 2, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 2's construction phase, although of shorter duration than that of the Project, could increase in demand for police protection

services. To reduce Los Angeles Police Department (LAPD) demand during construction, Alternative 2, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 2 may involve temporary partial lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. As with the Project, Alternative 2 would implement Project Design Features TRAF-PDF-2 and TRAF-PDF-3. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, it is not anticipated that any additional officers from LAPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during construction would reduce the potential for incidents that would require police responses.

As with the Project, operation of Alternative 2 would only contribute to increasing the number of non-resident site populations (visitors and employees). As such, Alternative 2 does not propose any residential uses and would therefore not directly generate any new residential population in the Wilshire Community Area. Thus, the officer to resident population ratio of 1:933 for the Wilshire Community Area would be maintained under operation of Alternative 2. The City does not separately consider non-residential population increases when calculating increased demand for police services. Moreover, as with the Project, demand for police services under Alternative 2 would be reduced with implementation of Project Design Feature POL-PDF-2, which includes the implementation of operational security features such as gated entries, keycard access, and closed circuit TV monitoring (CCTV), which would help to offset the Project's operational demand for police protection services from LAPD. With the implementation of Project Design Feature POL-PDF-2, Alternative 2 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 2, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, with the reduction in scale of development and occupancy under Alternative 2, impacts to police protection services under Alternative 2 would be less than the Project's less-than-significant impacts.

(i) *Transportation*(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

Similar to the Project, Alternative 2 would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 2, as with the Project, would not conflict with policies of Mobility Plan 2035. In addition, Alternative 2 would be consistent with applicable transportation goals of the Wilshire Community Plan. As with the Project, Alternative 2 would implement Project Design Feature TRAF-PDF-1, which would encourage employees and patrons of the Project to utilize alternative modes of travel by providing bicycle and pedestrian amenities, promoting alternative transportation modes, supporting carpools and rideshares, and implementing an employee parking management program. Alternative 2, as with the Project, would not conflict with any of the policies and procedures contained in the Los Angeles Department of Transportation (LADOT) Manual of Policies and Procedures; with Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025 (Vision Zero) to reduce traffic-related deaths; and with LAMC Section 12.21.A.16 and LAMC Section 12.26J. Consistent with Plan for a Healthy Los Angeles, Alternative 2 would prioritize safety and access for all individuals utilizing the Project Site by complying with all Americans with Disabilities Act (ADA) requirements and providing direct connections to pedestrian amenities at adjacent intersections. Alternative 2 would also be consistent with Citywide Design Guidelines as they relate to Pedestrian-First Design. Alternative 2 would implement many of the key features identified in the Mobility Hubs Reader's Guide, including LAMC-required short-term and long-term bicycle parking that both facilitates and encourages bicycling in and around the Project Site. Similar to the Project, Alternative 2 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project's less-than-significant impacts.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

As analyzed within **Section IV.I, Transportation**, the Project would generate 7.5 work VMT per employee, which is below the threshold of significance for the Central Area Planning Commission (APC) of 7.6 work VMT per employee. As shown in the Alternatives Transportation Analysis Memo, provided in Appendix L of this Draft EIR, the uses proposed under Alternative 2 would similarly generate an employee VMT per capita of 7.5. As such, Alternative 2 would result in a similar VMT rate, and similar to the Project, the work VMT generated under Alternative 2

would be below the threshold of significance for the Central APC work VMT per employee. Note that Alternative 2, as with the Project, is exempt from evaluation of the retail VMT, because the retail component under Alternative 2 is less than 50,000 square feet and considered local-serving. As worker VMT is below the Central APC thresholds, impacts with respect to CEQA Guidelines Section 15064(b) would be less than significant for Alternative 2 and similar to the Project's less-than-significant impacts.

(j) *Tribal Cultural Resources*

The records search results for the Project Site indicates that no archaeological resources have been recorded within the Project Site or a 0.5-mile radius. In addition, the results of the Sacred Lands File (SLF) search conducted by the Native American Heritage Commission (NAHC) indicate that Native American cultural resources are not known to be located within the Project Site. No known tribal cultural resources have been identified as a result of the research or consultation with the tribes. However, as with the Project, excavations associated with Alternative 2 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are encountered during construction under Alternative 2, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent tribal cultural resource discoveries. With compliance with the City's standard Conditions of Approval, Alternative 2, as with the Project, would result in less-than-significant impacts to tribal cultural resources. However, because earth movement under Alternative 2 would be greater, impacts related to tribal cultural resources would be greater than the Project's less-than-significant impacts.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 2, the Development under Existing Zoning Alternative, would consist of a three-story, 48,435-square-foot medical office and retail-commercial building, consisting of 46,768 square feet of medical office uses and 1,666 square feet of ground floor retail-commercial uses. Alternative 2 would consist of a 67 percent reduction in floor area as compared to the Project.

Alternative 2 would create jobs with construction of the proposed building as well as incorporate green building design and active the ground floor with commercial uses within a mixed use medical office building. As such, Alternative 2 is considered to be fully consistent with the following objectives:

1. Encourage economic growth in the community through the creation of construction jobs and full-time, on-site jobs.
3. Incorporate sustainable and green building design and construction that exceed building code and Title 24 requirements in areas related to landscape design (green roofs/balconies) to incorporate ecofriendly building materials,

systems and features, solar efficiency (solar ready roofs), efficient and low flow water management non-VOC paints and adhesives, high-performance building envelope and energy efficient building systems.

6. Enhance the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area.

While Alternative 2 would provide similar uses as the Project, it would provide these uses within a reduced building size. As such, it would not meet the following objectives to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objectives:

2. Redevelop the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities to serve the local community and regional area near a key regional medical center.
4. Develop the site with a well-designed commercial and medical office project within a transit priority area which would maximize the benefit of nearby Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, an Antelope Valley Transit Authority (AVTA) bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station (expected to open in 2023) and, thus, would support smart growth with the intent of reducing air quality emissions and VMT generation.
5. Construct a medical office building at an intensity consistent with the zoning for commercial buildings on Wilshire Boulevard which include similar mid-rise office buildings in proximity of transit and along corridors.

c) Alternative 3: Reduced Square Footage Alternative

(1) Description of the Alternative

Under the Reduced Square Footage Alternative (Alternative 3), the Project would see a 25 percent reduction in density and square feet. With this reduction, Alternative 3 would include 105,229 square feet of medical office uses and 3,750 square feet of ground floor retail-commercial uses (750 square feet of retail and 3,000 square feet of restaurant uses), for a total of 108,979 square feet compared to the Project's proposed 145,305 square feet. This alternative would have a FAR of 3.4:1. The proposed building under Alternative 3 would be nine stories (180 feet in height), a reduction from the 12 stories (218 feet in height) as proposed under the Project. There would be no open space in Alternative 3; therefore, total open space provided by Alternative 3 would be less than the total open space provided by the Project.

Under Alternative 3, 313 vehicle parking spaces would be provided in four above-ground parking levels (Floors 2 through 5), and 664 short-term and long-term

bicycle parking spaces would be provided on the ground level and roof. Similar to the Project, the vehicular parking accounts for a permitted reduction pursuant to LAMC Section 12.21 A.4(c) and LAMC Section 12.32 P.

As with the Project, Alternative 3 would provide a visitor drop-off and valet area that would be accessible from the visitor entrance off the frontage road of South San Vicente Boulevard to accommodate a parking queue and ride-share drop off area. Vehicle access for employees to the parking levels (Floors 2 through 5) would be provided from Orange Street. A loading dock serving the medical office and retail-commercial uses would be located and accessed from Orange Street. No vehicular access would be provided through the alley. Pedestrian access to the retail-commercial uses would continue to be provided from the South Sweetzer Avenue and the frontage road of South San Vicente Boulevard. Access to the medical office uses would continue to be provided from the ground level lobby for the office building along the frontage road of South San Vicente Boulevard and from the parking levels.

As with the Project, Alternative 3 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. With reduced density and square footage, the overall length and intensity of construction would be less than that of the Project.

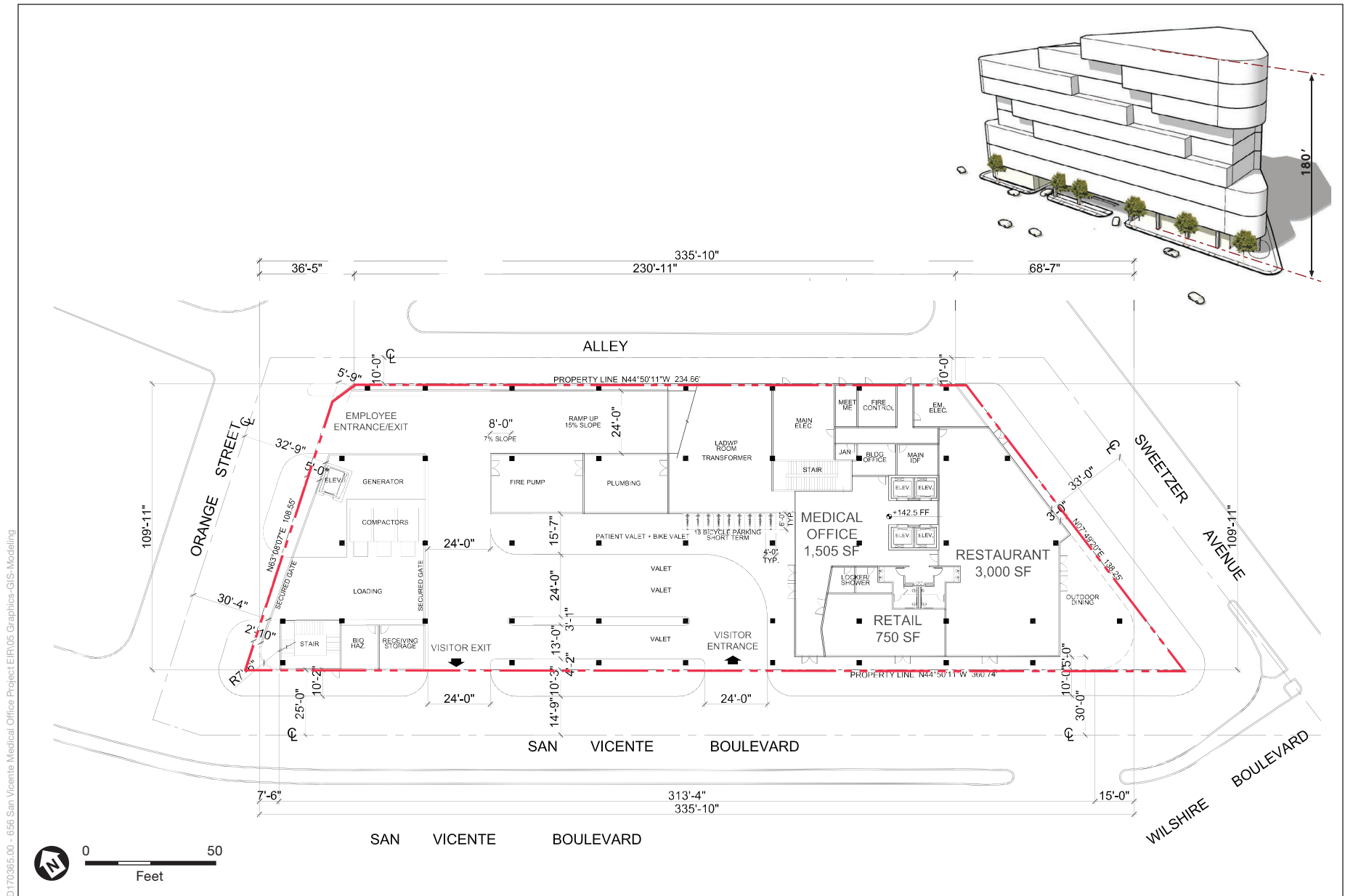
Figure V-2, *Site Plan and Building Massing for Alternative 3*, provides a site plan and building massing proposed for Alternative 3 as described above.

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

Similar to the Project, Alternative 3 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 3 would be consistent with the growth projections in the 2016 AQMP, since the growth would occur in a HQTAs. As with the Project, Alternative 3 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 3 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Wilshire Community Plan area. The location of Alternative 3 would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. For all of these reasons, impacts under Alternative 3 with respect to consistency with air quality management plans would be less than significant and similar to the Project's less-than-significant impacts.



SOURCE: ZGF Architects, 2020

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Figure V-2
Site Plan and Building Massing for Alternative 3

(ii) *Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards*

(a) Construction

As with the Project, construction of Alternative 3 has the potential to generate temporary regional criteria pollutant emissions through the operation of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities such as the application of paint and other surface coatings. The maximum emissions under Alternative 3 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. As with the Project, Alternative 3 would comply with SCAQMD Rule 403 (Control of Fugitive Dust) and SCAQMD Rule 1113 (Architectural Coatings). Similar to the Project, construction emissions under Alternative 3 would not exceed SCAQMD numerical significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. Thus, as with the Project, impacts during construction would be less than significant under Alternative 3 for these criteria pollutants. Alternative 3 would require similar earth movement as the Project, but as the building under Alternative 3 would result in reduced density and square footage as compared to the Project, the overall length and intensity of construction would be less than that of the Project. As Alternative 3 would reduce construction duration, impacts with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project's less-than-significant impacts.

(b) Operation

During operation, Alternative 3 would generate regional criteria pollutant emissions through mobile sources such as vehicle trips from patrons and employees and delivery trucks traveling to and from the Project Site, and through area (consumer products, architectural coatings, and landscaping) and energy sources (natural gas). Similar to the Project, Alternative 3 would comply with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Also, mobile sources emissions would be reduced under Alternative 3 compared to the Project due to the reduction in traffic trips. Similar to the Project, operational emissions under Alternative 3 would not exceed SCAQMD numerical significance thresholds for VOC, CO, SO_x, PM₁₀, and PM_{2.5} and emissions related to air quality standards would be less than significant. As Alternative 3 would be developed at a lower intensity and have less traffic than the Project, impacts under Alternative 3 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project's less-than-significant impacts.

(iii) *Sensitive Receptors*

(a) Localized Emissions

(i) *Construction*

As with the Project, Alternative 3 would generate construction activity and an increase in localized emission levels. It can be expected that maximum daily localized construction emissions would be similar to the Project. As with the Project, maximum localized construction emissions would be below the localized screening thresholds for all analyzed criteria pollutants except PM_{2.5}. Similar to the Project, with incorporation of Mitigation Measure AIR-MM-1, which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards, localized construction emissions would be reduced to below the significance thresholds and impacts would be mitigated to less than significant. Therefore, similar to the Project, with respect to localized construction, impacts to sensitive receptors would be less than significant under Alternative 3 with implementation of mitigation. Alternative 3 would require similar earth movement as the Project, but as the building under Alternative 3 would result in reduced density and square footage as compared to the Project, the overall length and intensity of construction would be less than that of the Project. Accordingly, impacts under Alternative 3 with respect to localized emissions during construction would be less than the Project's less-than-significant impacts with incorporated mitigation.

(ii) *Operation*

As with the Project, Alternative 3 would generate an increase in localized emission levels during operation due to consumer product usage, architectural coatings usage, energy usage, emergency generator usage, and charbroiler usage. Because of its smaller scale and intensity, localized operational emissions under Alternative 3 would be less than the Project. As with the Project, maximum localized operational emissions at sensitive receptors would be below the localized screening thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, similar to the Project, with respect to localized operation emissions, impacts to sensitive receptors would be less than significant under Alternative 3. Alternative 3 would reduce the scale and building floor area compared to the Project. The reduction in building floor area and reduced occupancy of the Project Site under Alternative 3 would reduce daily operational localized emissions from less consumer product usage, architectural coatings usage, and building energy demand, as well as a smaller emergency generator and charbroiler usage. Accordingly, impacts under Alternative 3 with respect to localized emissions would be less than the Project's less-than-significant impacts.

(b) Carbon Monoxide Hotspots

Vehicle trips would be less under Alternative 3 than the Project. As such, as with the Project, Alternative 3 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. As

Alternative 3 would reduce the Project's daily vehicle trips, impacts would be less than the Project's less-than-significant impacts.

(c) Toxic Air Contaminants

(i) Construction

Under Alternative 3, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. As with the Project, with implementation of the required mitigation, Alternative 3 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. Alternative 3 would require similar earth movement as the Project, but as the building under Alternative 3 would result in reduced density and square footage as compared to the Project, the overall length and intensity of construction would be less than that of the Project. As such, impacts under Alternative 3 would be less than the Project's less-than-significant impacts with incorporated mitigation.

(ii) Operation

Alternative 3, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling activities associated with the restaurant uses and consumer products associated with re-applying architectural coatings and cleaning building surfaces. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, under Alternative 3, as with the Project, it is anticipated that one emergency generator would be implemented onsite, which would be required to comply with SCAQMD's Rule 1470 (Requirements For Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) and the emergency generator would be certified to the most stringent CARB and USEPA Tier 4 emissions standards, and emissions minimized to the lowest technically feasible level for equipment of this size and type. Compliance with Rule 1470 and the Tier 4 standards would ensure the TAC emissions from the emergency generator installed onsite would not cause or contribute to adverse health impacts at nearby sensitive receptors. With respect to the use of consumer products and architectural coatings, the medical office and retail/restaurant uses associated with Alternative 3 would be expected to generate minimal emissions from these sources. The Alternative 3's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses

expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 3 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 3, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. However, because of Alternative 3's reduced overall scale of development and reduction in use of consumer products and other sources, such as architectural coatings, impacts under Alternative 3 would be less than the Project's less-than-significant impacts.

(b) *Cultural Resources*

(i) *Historical Resources*

As with the Project, Alternative 3 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. Both buildings are not considered a historical resource pursuant to CEQA. In addition, the vacant educational building does not qualify as a contributor to a potential historic district. Furthermore, the Project Site is not situated in a designated or previously evaluated historic district. As with the Project, even though construction of Alternative 3 would alter the low-rise setting of the Project Site, the setting of the Project Site has already been substantially altered by large-scale infill construction and redevelopment and Alternative 3 is situated at enough of a distance from the historical resources so as not to cause any material impairment or substantial visual impact. After project completion, historical resources in the vicinity of the Project Site would retain their existing eligibility and visibility within the urban environment. Therefore, impacts under Alternative 3 with respect to historical resources would be less than significant and similar to the Project's less-than-significant impacts.

(ii) *Archaeological Resources*

Similar to the Project, excavation under Alternative 3 would reach depths of approximately 30 feet for building footings. Similar to the Project, excavation under Alternative 3 could have the potential to disturb existing or undiscovered archaeological resources. Disturbance or destruction of these resources could constitute a significant impact. Alternative 3, as with the Project, would implement Mitigation Measures CUL-MM-1 through CUL-MM-3, which require archaeological monitoring, treatment of unanticipated discoveries, and reporting, would ensure that potentially significant impacts to archaeological resources are reduced to a less-than-significant level. Under Alternative 3, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level and would be similar to the Project's less-than-significant impacts with incorporated mitigation.

(c) *Energy*

(i) *Efficient Energy Consumption*

During construction of Alternative 3, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction of Alternative 3 would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction workers travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As previously discussed, overall Alternative 3 would have a reduced density and square footage as compared to the Project. As such, the overall length and intensity of construction would be less than that of the Project. A shorter construction length would mean less overall electricity and transportation energy usage during construction. Construction equipment would comply with federal, State, and regional requirements where applicable. In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

During operation of Alternative 3, energy would be consumed for multiple purposes, including, but not limited to, HVAC; refrigeration; lighting; and the use of electronics, equipment, and appliances. Energy would also be consumed during operation of Alternative 3 related to water usage, solid waste disposal, and vehicle trips. As with the Project, Alternative 3 would comply with existing minimum energy efficiency requirements such as the 2019 Title 24 standards and applicable 2019 CALGreen requirements. In addition, similar to the Project, the design of Alternative 3 and its characteristics would be consistent with and would not conflict with the goals of the SCAG 2020–2045 RTP/SCS. In particular, Alternative 3 includes a mixed-use design and increase in density, which is located on an infill site within an HQTa and in close proximity to existing high-quality transit including the future Wilshire/La Cienega Metro D (Purple) Line Station in 2023 and multiple Metro bus routes; its proximity to existing restaurant, office, retail, entertainment, and residential land uses; and its highly walkable environment support the conclusion that Alternative 3 has been properly designed and located so that its development would achieve a reduction in VMT greater than the regional and Statewide averages.

Section IV.C, *Energy*, of this Draft EIR concludes that the Project's energy requirements would not substantially affect local and regional supplies or capacity

during construction or operation, and that the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With its reduction in floor area of approximately 25 percent compared to the Project, Alternative 3 would generate a lower level of energy demand than would the Project. Thus, impacts related to efficient energy consumption as with the Project would be less than significant and, because the scale of development would be less, impacts with respect to energy consumption would be less than the Project's less-than-significant impacts.

(ii) Conflict with Plans for Renewable Energy or Energy Efficiency

As with the Project, Alternative 3 is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Code, which have been incorporated into the Los Angeles Green Building Code as amended by the City, to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Los Angeles Green Building Code). In addition, Alternative 3's land use characteristics indicate that Alternative 3 has been properly designed and located so that its development would achieve a reduction in VMT greater than the regional and Statewide averages.

Based on the above, Alternative 3 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As with the Project, the impact of Alternative 3 with respect to compliance with renewable energy and energy efficiency would be less than significant. As Alternative 3 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 3 would be similar to the Project's less-than-significant impacts.

(d) Geology and Soils

(i) Liquefaction

Alternative 3 would be built within the same boundaries of the Project Site, which include soils potentially susceptible to liquefaction. As with the Project, Alternative 3 would require a deepened foundation system that consists of drilled friction piles, or equivalent foundation system that would be embedded a minimum of 10 feet into the bedrock, which is located 30 feet below ground surface in accordance with the City's building code requirements. Under this design of the deepened foundation system, the friction piles would extend through the potentially liquefiable soil layers and, as such, would not subject the proposed building to liquefaction. Alternative 3 would also comply with LAMC Section 91.7006, which

would require this alternative to provide a final, site-specific Geotechnical Report that would include the preliminary recommendations for the Geotechnical Report as well as the final recommendations from the report that would be enforced by the LADBS. As with the Project, through implementation of mitigation measures and adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to liquefaction under Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(ii) *Unstable Geologic Units*

Excavation under Alternative 3, as with the Project, would cause disturbance of existing soils and could contribute to potential localized raveling or caving of excavated areas (e.g., the excavated side walls losing stability). However, all required excavations would be sloped and properly shored in accordance with the applicable provisions of the CBC incorporated into the City's Building Code to minimize the potential for site stability hazards during temporary excavation activities. In addition, Alternative 3 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulatory requirements. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(iii) *Expansive Soils*

Alternative 3 would be built within the same boundaries of the Project Site, which include soils that have a moderate potential for expansion. However, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, compliance with standard construction and engineering practices (i.e., on-site excavation requiring suitable engineered stabilization in accordance with the CBC and proper engineering erosion control and proper engineering drainage design), addressing expansive soils and building code regulations pertinent to foundation stability would ensure that expansive soils are removed, as necessary. As such, as with the Project, impacts related to expansive soils under Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(iv) *Paleontological Resources*

Excavation associated with both Alternative 3 and the Project would reach depths of approximately 30 feet and would require similar earth movement. As with the Project, excavation under Alternative 3 could have the potential to directly or

indirectly destroy a unique paleontological resource not identified in the analysis conducted for the Project Site and, as such, could result in a potentially significant impact. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 3 would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less than significant. Impacts under Alternative 3 would be similar to the Project's less-than-significant impacts with incorporated mitigation.

(e) *Greenhouse Gas Emissions*

The construction and operation of the Project Site under Alternative 3, as with the Project, would increase GHG emissions. The smaller scale and lower mobile emissions associated with Alternative 3 would generate lower GHG emissions than the Project's maximum GHG operational emissions. As with the Project, Alternative 3 would incorporate applicable project design features, including Project Design Feature TRAF-PDF-1, which would encourage residents and employees of the Project to utilize alternative modes of travel by providing bicycle and pedestrian amenities, promoting alternative transportation modes, supporting carpools and rideshares, and implementing an employee parking management program. GHG emission impacts under Alternative 3, as with the Project, would be less than significant. Due to its lower GHG emissions, under Alternative 3 with respect to GHG emissions, impacts on the environment would be less than the Project.

Alternative 3, as with the Project, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS, L.A.'s Green New Deal (Sustainability pLAN 2019), and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 3. As discussed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR, the results of the analysis show that with the Project, the employee VMT per capita would be 7.5 compared to the threshold of 7.6. As shown in the Alternatives Transportation Analysis Memo, provided in Appendix L of this Draft EIR, the uses proposed under Alternative 3 would similarly generate an employee VMT per capita of 7.5. As such, because Alternative 3 would result in a similar VMT rate and would not conflict with applicable GHG plans, similar to the Project, impacts under Alternative 3 with respect to conflicts with GHG plans adopted for the purpose of reducing the emissions of GHGs would be less than significant. As the smaller scale and lower mobile emissions associated with Alternative 3 would generate lower GHG emissions than the Project's maximum GHG operational emissions, impacts related to GHG emissions would be less than the Project's less-than-significant impacts.

(f) *Land Use and Planning*

Alternative 3 proposes 108,979 square feet of medical office and ground floor retail-commercial uses, with an approximate FAR of 3.4:1. Similar to the Project, Alternative 3 would also require amended zoning of (Q)C2-2D-O and a General Plan Amendment from Limited Commercial to Regional Center Commercial to allow for Alternative 3's proposed building height and floor area.

As with the Project, the density and location of Alternative 3 would not conflict with policies of regional and local land use plans adopted to avoid or mitigate environmental effects, including SCAG's 2020–2045 RTP/SCS, City of Los Angeles General Plan Framework Element, Wilshire Community Plan, or LAMC, and, as such, impacts with respect to land use would be less than significant. Changes in zoning or land use designations would be similar to the Project, impacts in relation to existing plans that avoid or reduce environmental impacts would be similar to the Project's less-than-significant impacts.

(g) *Noise*

(i) *Noise Levels in Excess of Standards*

(a) *Construction*

Construction activities under Alternative 3 would be similar to those of the Project and would generally include site demolition, site preparation, grading/excavation, drainage/utilities/trenching, building construction, foundation concrete pour, architectural coating, and paving. Similar to the Project, maximum construction activities under Alternative 3 would increase noise levels at several sensitive receptor locations in the vicinity of the Project Site. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum construction noise levels under Alternative 3 would be the same as the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 through NOI-MM-4 would be implemented under Alternative 3 to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors would still exceed the significance threshold. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 3. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater than five dBA Leq) compared to existing traffic noise levels along any of the studied roadway

segments, and impacts would be less than significant. Alternative 3 would require similar earth movement as the Project, but as the building under Alternative 3 would result in reduced density and square footage as compared to the Project, the overall length and intensity of construction would be less than that of the Project. Therefore, the duration of construction noise exceedance levels would be shorter. As such, impacts related to construction noise under Alternative 3 would be less than the Project's significant and unavoidable impacts.

(b) Operation

Alternative 3, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, outdoor spaces, parking facilities, loading docks and refuse collection, and emergency generators. However, Alternative 3 would involve a smaller scale project with fewer overall off-site vehicle trips. Therefore, operational mobile source noise impacts would be incrementally less under Alternative 3 than the Project. As the Project would not exceed the significance thresholds for off-site traffic noise, off-site traffic noise impacts under Alternative 3 would also not exceed any significance thresholds and impacts would be less than significant.

With a decrease in square footage of medical office and ground floor retail-commercial uses compared to the Project, operational noise levels from on-site operational noise would be incrementally less than the Project. Under Alternative 3, fixed mechanical equipment, loading docks and refuse collection, and emergency generators would be located in similar locations as the Project and would include similar enclosures. As with the Project, noise levels from these noise sources under Alternative 3 would be less significant. In addition, the reduced size of outdoor open spaces would result in a reduced size in occupant load of Project outdoor spaces and would incrementally reduce the noise generated by outdoor spaces. As the noise contribution from outdoor spaces would be minimal and impacts would be less than significant under the Project, outdoor noise generated under Alternative 3 would similarly be less than significant. Furthermore, parking under Alternative 3 would be provided in above ground parking levels, as with the Project; these parking areas would be completely enclosed on all sides and, therefore, noise generated within the parking areas would be shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. Impacts from parking facilities under Alternative 3, as with the Project, would be less than significant. Overall, composite operational noise levels would be less than significant. Given the reduced number of vehicle trips and reduced outdoor noise sources under Alternative 3, impacts would be less than the Project's less-than-significant impacts.

(ii) *Groundborne Vibration*

(a) Construction

Construction of Alternative 3, as with the Project, would generate groundborne construction vibration from the operation of heavy equipment (e.g., backhoe, dozer, excavators, drill rig, loader, scraper, and haul trucks). As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 3 would be below the structural damage significance criteria at off-site building structures. In addition, as with the Project, the structural damage vibration impacts from off-site construction traffic would also be below the structural damage significance criteria. Therefore, on-site and off-site vibration impacts pursuant to the significance criteria for building damage would be less than significant.

Regarding human annoyance, as with the Project, the estimated vibration levels due to construction equipment would exceed the vibration significance threshold for human annoyance at receptors V1, V3, and V4. Therefore, the on-site vibration impacts pursuant to the significance criteria for human annoyance during construction of Alternative 3 would be potentially significant. However, similar to the Project, there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors V1, V2, V3, V4, and V5. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 3. However, because the overall scale of development would be reduced by approximately 25 percent under Alternative 3, the duration of construction and overall construction activity causing vibration would be less, and impacts under Alternative 3 would be less than the Project's significant and unavoidable impacts.

(b) Operation

Day-to-day operations under Alternative 3, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas. It is anticipated that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 3, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 3 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 3 would be less than significant. As Alternative 3 would reduce the overall occupancy of the Project Site, off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 3, and, as such, impacts under Alternative 3 would be less than the Project's less-than-significant impacts.

(h) *Public Services*

(i) *Fire Protection*

Alternative 3, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. As with the Project, Alternative 3 would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to minimize disruptions to traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. As with the Project, Alternative 3 would also incorporate Project Design Feature TRAF-PDF-3, which would identify alternate parking location(s) and the method of transportation to and from the Project Site. The implementation of these project design features would facilitate emergency access. As such, similar to the Project, construction under Alternative 3 would result in less-than-significant impacts with respect to performance objectives for fire protection.

During operation, Alternative 3 would result in a net population increase of 411 employees. By comparison, the Project would result in a net population increase of 566 employees. Alternative 3, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, as the Project Site is not located with the distance standards of an Engine Company or Truck Company, automatic fire sprinklers would be required to be installed under Alternative 3. However, as the Project Site is located within a highly urbanized area accessed via an established street system, impacts on emergency response would not be significant. Alternative 3, as with the Project, would also be consistent with LAMC fire flow requirements. As such, Alternative 3, would not result in substantial adverse physical impacts associated with the provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 3, as with the Project, would be less than significant. However, because Alternative 3 would reduce construction duration and Project Site occupancy (employees) compared to the Project, impacts related to fire protection services under Alternative 3 would be less than the Project's less-than-significant impacts.

(ii) *Police Protection*

Alternative 3, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 3's construction phase, although of shorter duration than that of the Project, could increase in demand for police protection services. To reduce LAPD demand during construction,

Alternative 3, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 3 may involve temporary partial lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. As with the Project, Alternative 3 would implement Project Design Features TRAF-PDF-2 and TRAF-PDF-3. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, it is not anticipated that any additional officers from LAPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during construction would reduce the potential for incidents that would require police responses.

As with the Project, operation of Alternative 3 would only contribute to increasing the number of non-resident site populations (visitors and employees). As such, Alternative 3 does not propose any residential uses and would therefore not directly generate any new residential population in the Wilshire Community Area. Thus, the officer to resident population ratio of 1:933 for the Wilshire Community Area would be maintained under operation of Alternative 3. The City does not separately consider non-residential population increases when calculating increased demand for police services. Moreover, as with the Project, demand for police services under Alternative 3 would be reduced with implementation of Project Design Feature POL-PDF-2, which includes the implementation of operational security features such as gated entries, keycard access, and CCTV, which would help to offset the Project's operational demand for police protection services from LAPD. With the implementation of Project Design Feature POL-PDF-2, Alternative 3 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility would be required to maintain service. As such, Alternative 3, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, with the reduction in scale of development and occupancy under Alternative 3, impacts to police protection services under Alternative 3 would be less than the Project's less-than-significant impacts.

(i) *Transportation*(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

Similar to the Project, Alternative 3 would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 3, as with the Project, would not conflict with policies of Mobility Plan 2035. In addition, Alternative 3 would be consistent with applicable transportation goals of the Wilshire Community Plan. As with the Project, Alternative 3 would implement Project Design Feature TRAF-PDF-1, which would encourage employees and patrons of the Project to utilize alternative modes of travel by providing bicycle and pedestrian amenities, promoting alternative transportation modes, supporting carpools and rideshares, and implementing an employee parking management program. Alternative 3, as with the Project, would not conflict with any of the policies and procedures contained in the LADOT Manual of Policies and Procedures; with Vision Zero to reduce traffic-related deaths; and with LAMC Section 12.21.A.16 and LAMC Section 12.26J. Consistent with Plan for a Healthy Los Angeles, Alternative 3 would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities at adjacent intersections. Alternative 3 would also be consistent with Citywide Design Guidelines as they relate to Pedestrian-First Design. Alternative 3 would implement many of the key features identified in the Mobility Hubs Reader's Guide, including LAMC-required short-term and long-term bicycle parking that both facilitates and encourages bicycling in and around the Project Site. Similar to the Project, Alternative 3 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project's less-than-significant impacts.

(ii) *Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)*

As analyzed within **Section IV.I, Transportation**, the Project would generate 7.5 work VMT per employee, which is below the threshold of significance for the Central APC of 7.6 work VMT per employee. As shown in the Alternatives Transportation Analysis Memo, provided in Appendix L of this Draft EIR, the uses proposed under Alternative 3 would similarly generate an employee VMT per capita of 7.5. As such, Alternative 3 would result in a similar VMT rate, and similar to the Project, the work VMT generated under Alternative 3 would be below the threshold of significance for the Central APC work VMT per employee. Note that Alternative 3, as with the Project, is exempt from evaluation of the retail VMT,

because the retail component under Alternative 3 is less than 50,000 square feet and considered local-serving. As worker VMT is below the Central APC thresholds, impacts with respect to CEQA Guidelines Section 15064(b) would be less than significant for Alternative 3 and similar to the Project's less-than-significant impacts.

(j) *Tribal Cultural Resources*

The records search results for the Project Site indicates that no archaeological resources have been recorded within the Project Site or a 0.5-mile radius. In addition, the results of the SLF search conducted by the NAHC indicate that Native American cultural resources are not known to be located within the Project Site. No known tribal cultural resources have been identified as a result of the research or consultation with the tribes. However, as with the Project, excavations associated with Alternative 3 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are encountered during construction under Alternative 3, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent tribal cultural resource discoveries. With compliance with the City's standard Conditions of Approval, Alternative 3, as with the Project, would result in less-than-significant impacts to tribal cultural resources and impacts would be similar to the Project's less-than-significant impacts.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 3, the Reduced Square Footage Alternative, would consist of a nine-story, 108,979-square-foot medical office and retail-commercial building, consisting of 105,229 square feet of medical office uses and 3,750 square feet of ground floor retail-commercial uses, which is a 25 percent reduction in floor area as compared to the Project.

Alternative 3 would create jobs during construction of the proposed building as well as the operation of a mixed-use retail and medical office building. As such, Alternative 3 is considered to be fully consistent with the following objectives:

1. Encourage economic growth in the community through the creation of construction jobs and full-time, on-site jobs.
3. Incorporate sustainable and green building design and construction that exceed building code and Title 24 requirements in areas related to landscape design (green roofs/balconies) to incorporate ecofriendly building materials, systems and features, solar efficiency (solar ready roofs), efficient and low flow water management non-VOC paints and adhesives, high-performance building envelope and energy efficient building systems.

6. Enhance the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area.

While Alternative 3 would provide similar uses as the Project, it would provide these uses within a reduced building size. As such, it would not meet the following objectives to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objectives:

2. Redevelop the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities to serve the local community and regional area near a key regional medical center.
4. Develop the site with a well-designed commercial and medical office project within a transit priority area which would maximize the benefit of nearby Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, an Antelope Valley Transit Authority (AVTA) bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station (expected to open in 2023) and, thus, would support smart growth with the intent of reducing air quality emissions and VMT generation.
5. Construct a medical office building at an intensity consistent with the zoning for commercial buildings on Wilshire Boulevard which include similar mid-rise office buildings in proximity of transit and along corridors.

d) Alternative 4: Residential Mixed-Use Alternative

(1) Description of the Alternative

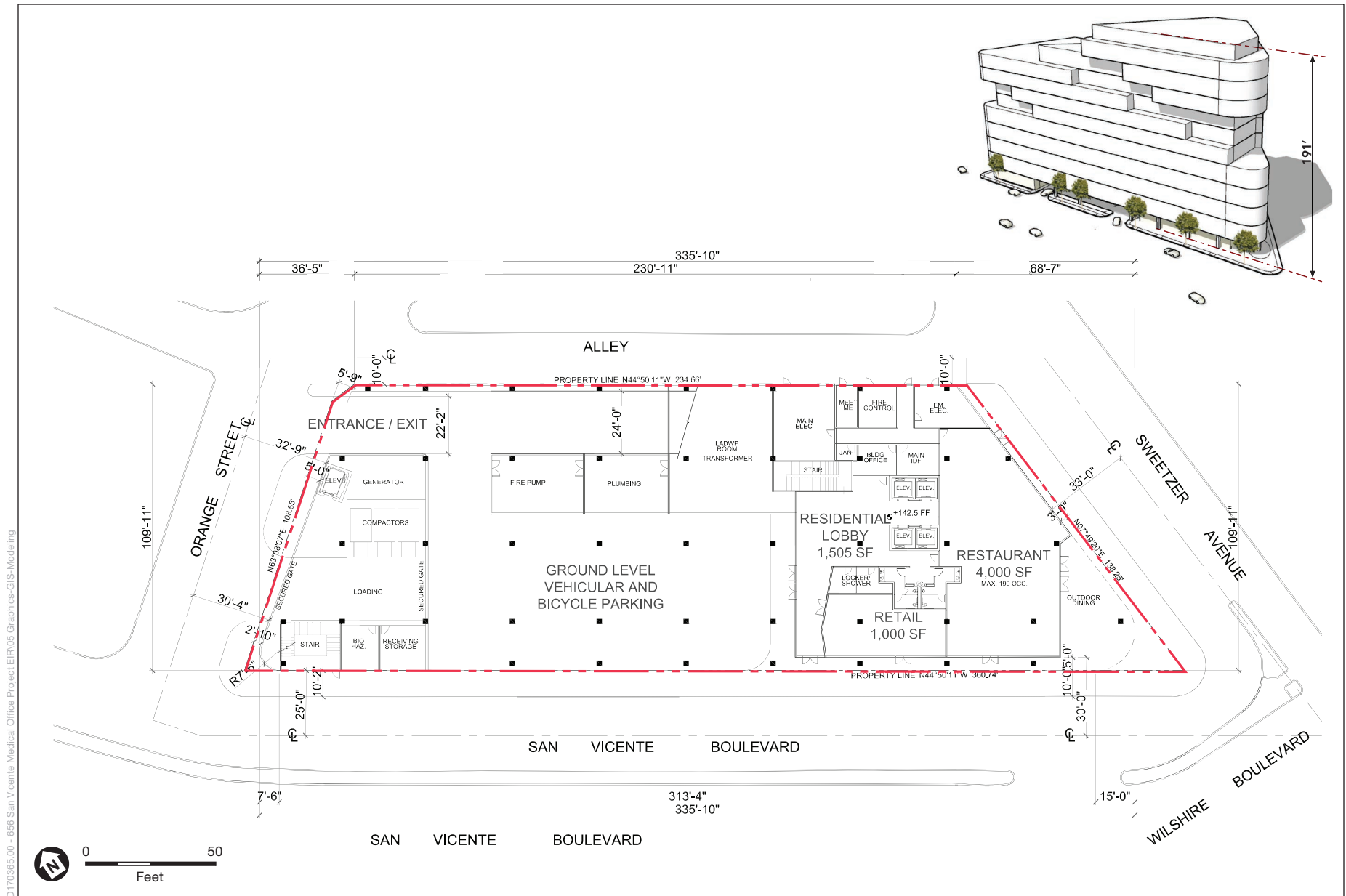
The Residential Mixed-Use Alternative (Alternative 4) is an alternative use scheme that would include a building with a mix of commercial and residential uses. No medical office uses would be included under this alternative. Similar to the Project, Alternative 4 would include 5,000 square feet of ground-floor commercial retail and restaurant uses (1,000 square feet of retail and 4,000 square feet of restaurant uses). In addition, up to 80 residential dwelling units, encompassing 140,305 square feet, would be developed. Similar to the Project, the proposed building under this alternative would total 145,305 square feet for a total FAR of 4.5:1. The proposed building under Alternative 4 would have a similar number of stories and slightly reduced height as proposed under the Project (i.e., 12 stories and 191 feet in height). Alternative 4 would provide 10,000 square feet of open space pursuant to LAMC Section 12.21.G; therefore, the total open space provided by Alternative 4 would be greater than the total open space provided by the Project due to the open space requirements for residential uses. Of the 10,000 square feet of open space, 6,500 square feet would be rooftop common outdoor open space, of which 25 percent would be landscaped (1,625 square feet landscaped area) as required by the LAMC.

Under Alternative 4, 164 commercial vehicle parking spaces and 121 residential vehicle parking spaces, for a total of 285 vehicle parking spaces, would be provided in a ground-floor parking area and in four above ground-parking levels (Floors 2 through 5), and 120 short-term and long-term bicycle parking spaces would be provided on the ground level and roof. Unlike the Project, the vehicular parking does not account for a permitted reduction pursuant to LAMC Section 12.21 A.4(c).

With regard to access and circulation, Alternative 4 would not include a visitor drop-off and valet area. Rather, one driveway from Orange Street would provide access to the ground-floor parking area and above-ground parking levels (Floors 2 through 5) for the commercial and residential vehicle parking spaces. The driveway off Orange Street would be located in a similar area as under the Project. No vehicular access would be provided through the alley. Pedestrian access to the retail-commercial uses would continue to be provided from the South Sweetzer Avenue and the frontage road of South San Vicente Boulevard. Access to the residential uses would be provided from a ground-level lobby that would be provided along the frontage road of South San Vicente Boulevard and from the parking levels via internal stairs and elevators.

As with the Project, Alternative 4 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. However, as the density and square footage proposed under this alternative would be similar to that of the Project, the overall length and intensity of construction would be similar to the Project.

Figure V-3, *Site Plan and Building Massing for Alternative 4*, provides a site plan and building massing proposed for Alternative 4 as described above.



SOURCE: ZGF Architects, 2020

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Figure V-3
Site Plan and Building Massing for Alternative 4

(2) Environmental Impacts

(a) Air Quality

(i) Consistency with Air Quality Management Plan

Similar to the Project, Alternative 4 would include new development on the Project Site that would generate new criteria pollutant emissions. Similar to the Project, Alternative 4 would be consistent with the growth projections in the 2016 AQMP, since the growth would occur in a HQTAs. As with the Project, Alternative 4 would be consistent with the AQMP in its incorporation of appropriate control strategies for emissions reduction during construction and operation. In addition, Alternative 4 would also be consistent with applicable goals, objectives, and policies of the Air Quality Element of the General Plan that support and encourage pedestrian activity in the Wilshire Community Plan area. The location of Alternative 4 would provide opportunities for the use of alternative modes of transportation, including convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. For all of these reasons, impacts under Alternative 4 with respect to consistency with air quality management plans would be less than significant and similar to the Project's less-than-significant impacts.

(ii) Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standards

(a) Construction

As with the Project, construction of Alternative 4 has the potential to generate temporary regional criteria pollutant emissions through the operation of heavy-duty construction equipment, such as excavators and forklifts, through vehicle trips generated by workers and haul trucks traveling to and from the Project Site, and through building activities such as the application of paint and other surface coatings. The maximum emissions under Alternative 4 would be similar to the Project because emission levels are based on a single day in which maximum construction activity would occur. As with the Project, Alternative 4 would comply with SCAQMD Rule 403 (Control of Fugitive Dust) and SCAQMD Rule 1113 (Architectural Coatings). Similar to the Project, construction emissions under Alternative 4 would not exceed SCAQMD numerical significance thresholds for VOC, NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. Thus, as with the Project, impacts during construction would be less than significant under Alternative 4 for these criteria pollutants. Alternative 4 would require similar earth movement as the Project and would develop the same square footage as the Project. As such, impacts under Alternative 4 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be similar to Project's less-than-significant impacts.

(b) Operation

During operation, Alternative 4 would generate regional criteria pollutant emissions through mobile sources such as vehicle trips from residents and employees and delivery trucks traveling to and from the Project Site, and through area (consumer products, architectural coatings, and landscaping) and energy sources (natural gas). Similar to the Project, Alternative 4 would comply with SCAQMD Rule 1113 (Architectural Coatings), which limits the VOC content of architectural coatings. Mobile source emissions would be reduced under Alternative 4 compared to the Project due to the reduction in traffic trips, which would be reduced significantly from 382 vehicle trips to 33 vehicle trips because of the proposed residential uses, which have a lower trip generation compared to medical office uses proposed under the Project.⁵ Residential uses would also decrease emissions related to area sources as it relates to landscaping as less landscaping would be proposed under this alternative as compared to the Project. As such, overall criteria pollutant emissions under Alternative 4 would be less than that of the Project's emissions. Similar to the Project, operational emissions under Alternative 4 would not exceed SCAQMD numerical significance thresholds for VOC, CO, SO_x, PM₁₀, and PM_{2.5} and emissions related to air quality standards would be less than significant. As Alternative 4 would have less traffic than the Project, impacts under Alternative 4 with respect to cumulative increases in criteria pollutants and violations of air quality standards would be less than the Project's less-than-significant impacts.

(iii) Sensitive Receptors

(a) Localized Emissions

(i) Construction

As with the Project, Alternative 4 would generate construction activity and an increase in localized emission levels. It can be expected that maximum daily localized construction emissions would be similar to the Project. As with the Project, maximum localized construction emissions would be below the localized screening thresholds for all analyzed criteria pollutants except PM_{2.5}. Similar to the Project, with incorporation of Mitigation Measure AIR-MM-1, which would require the use of diesel-powered construction equipment that meet USEPA Tier 4 Final off-road emissions standards, localized construction emissions would be reduced to below the significance thresholds and impacts would be mitigated to less than significant. Therefore, similar to the Project, with respect to localized construction, impacts to sensitive receptors would be less than significant under Alternative 4 with implementation of mitigation. Alternative 4 would require similar earth movement as the Project and would develop the same square footage as the Project. As such, impacts under Alternative 4 with respect to localized emissions

⁵ Gibson Transportation Consulting, Inc., Transportation Analysis of Project Alternatives for the 656 San Vicente Medical Office Project, Los Angeles, California, October 8, 2020. Provided in Appendix L of this Draft EIR.

during construction would be similar to Project's less-than-significant impacts with incorporated mitigation.

(ii) *Operation*

As with the Project, Alternative 4 would generate an increase in localized emission levels during operation due to consumer product usage, architectural coatings usage, energy usage, emergency generator usage, and charbroiler usage. Localized operational emissions under Alternative 4 would be less than the Project as residential uses require less area source uses related to landscaping as less landscaping would be proposed under this alternative as compared to the Project. While Alternative 4 would result in higher localized emissions as compared to the Project, the increase would not exceed the localized screening thresholds for NO_x, CO, PM₁₀, and PM_{2.5}. Therefore, similar to the Project, with respect to localized operation emissions, impacts to sensitive receptors would be less than significant under Alternative 4. Alternative 4 would increase daily operational localized emissions as it relates to increased area source emissions from residential uses. Accordingly, impacts under Alternative 4 with respect to localized emissions would be less than the Project's less-than-significant impacts.

(b) *Carbon Monoxide Hotspots*

Vehicle trips would be less under Alternative 4 than the Project. As such, as with the Project, Alternative 4 would not cause or contribute considerably to the formation of CO hotspots, and impacts would be less than significant. As Alternative 4 would reduce the Project's daily vehicle trips, impacts would be less than the Project's less-than-significant impacts.

(c) *Toxic Air Contaminants*

(i) *Construction*

Under Alternative 4, as with the Project, temporary TAC emissions associated with DPM emissions from heavy construction equipment would occur during construction activities. Mitigation Measure AQ-MM-1 would require utilization of off-road diesel-powered construction equipment that meets or exceeds the most stringent and environmentally protective CARB and USEPA Tier 4 off-road emissions standards. The Tier 4 standards would reduce DPM emissions by approximately 81 to 96 percent compared to equipment that meet the Tier 2 off-road emissions standards. As with the Project, with implementation of the required mitigation, Alternative 4 would not expose sensitive receptors to substantial TAC concentrations, and impacts would be less than significant. Alternative 4 would require similar earth movement as the Project and would develop the same square footage as the Project. As such, impacts under Alternative 4 with respect to TAC emissions would be similar to Project's less-than-significant impacts with incorporated mitigation.

(ii) *Operation*

Alternative 4, as with the Project, would use consumer products and architectural coatings or involve other sources, such as charbroiling activities associated with the restaurant uses and consumer products associated with re-applying architectural coatings and cleaning building surfaces. TAC emissions from these sources are anticipated to be minimal and all restaurant emissions would be regulated under SCAQMD Rule 1138. In addition, under Alternative 4, as with the Project, it is anticipated that one emergency generator would be implemented onsite, which would be required to comply with SCAQMD's Rule 1470 (Requirements For Stationary Diesel-Fueled Internal Combustion and Other Compression Ignition Engines) and the emergency generator would be certified to the most stringent CARB and USEPA Tier 4 emissions standards, and emissions minimized to the lowest technically feasible level for equipment of this size and type. Compliance with Rule 1470 and the Tier 4 standards would ensure the TAC emissions from the emergency generator installed onsite would not cause or contribute to adverse health impacts at nearby sensitive receptors. With respect to the use of consumer products and architectural coatings, the residential and retail/restaurant uses associated with Alternative 4 would be expected to generate minimal emissions from these sources. The Alternative 4's land uses would not include installation of industrial-sized paint booths or require extensive use of commercial or household cleaning products. As a result, toxic or carcinogenic air pollutants are not expected to occur in any substantial amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, as with the Project, potential long-term operational impacts associated with the release of TACs under Alternative 4 would be minimal, regulated, and controlled, and would not be expected to exceed the applicable SCAQMD numerical significance thresholds. Operation of Alternative 4, as with the Project, would not expose sensitive receptors to substantial TAC concentrations, and operational impacts would be less than significant. As the overall scale of development proposed under Alternative 4 would be similar to that of the Project, impacts under Alternative 4 would be similar to Project's less-than-significant impacts.

(b) *Cultural Resources*

(i) *Historical Resources*

As with the Project, Alternative 4 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. Both buildings are not considered a historical resource pursuant to CEQA. In addition, the vacant educational building does not qualify as a contributor to a potential historic district. Furthermore, the Project Site is not situated in a designated or previously evaluated historic district. As with the Project, even though construction of Alternative 4 would alter the low-rise setting of the Project Site, as the setting of the Project Site has already been substantially

altered by large-scale infill construction and redevelopment and Alternative 4 is situated at enough of a distance from the historical resources so as not to cause any material impairment or substantial visual impact. After project completion, historical resources in the vicinity of the Project Site would retain their existing eligibility and visibility within the urban environment. Therefore, impacts under Alternative 4 with respect to historical resources would be less than significant and similar to the Project's less-than-significant impacts.

(ii) *Archaeological Resources*

Similar to the Project, excavation under Alternative 4 would reach depths of approximately 30 feet for building footings. Similar to the Project, excavation under Alternative 4 could have the potential to disturb existing or undiscovered archaeological resources. Disturbance or destruction of these resources could constitute a significant impact. Alternative 4, as with the Project, would implement Mitigation Measures CUL-MM-1 through CUL-MM-3, which require archaeological monitoring, treatment of unanticipated discoveries, and reporting, would ensure that potentially significant impacts to archaeological resources are reduced to a less-than-significant level. Under Alternative 4, as with the Project, potentially significant impacts to archaeological resources would be mitigated to a less-than-significant level and would be similar to the Project's less-than-significant impacts with incorporated mitigation.

(c) *Energy*

(i) *Efficient Energy Consumption*

During construction of Alternative 4, energy would be consumed in the form of electricity on a limited basis for powering lights, electronic equipment, or other construction activities necessitating electrical power. Construction of Alternative 4 would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Site, construction workers travel to and from the Project Site, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities). As discussed above, the overall length and intensity of construction would be similar to the Project. As such, overall electricity and transportation energy usage during construction of Alternative 4 would be similar as the Project's electricity and transportation energy usage during construction. Construction equipment would comply with federal, State, and regional requirements where applicable. In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

During operation of Alternative 4, energy would be consumed for multiple purposes, including, but not limited to, HVAC; refrigeration; lighting; and the use of electronics, equipment, and appliances. Energy would also be consumed during operation of Alternative 4 related to water usage, solid waste disposal, and vehicle trips. As with the Project, Alternative 4 would comply with existing minimum energy efficiency requirements such as the 2019 Title 24 standards and applicable 2019 CALGreen requirements. In addition, similar to the Project, the design of Alternative 4 and its characteristics would be consistent with and would not conflict with the goals of the SCAG 2020–2045 RTP/SCS. In particular, Alternative 4 includes a mixed-use design and increase in density, which is located on an infill site within an HQTAs and in close proximity to existing high-quality transit including the future Wilshire/La Cienega Metro D (Purple) Line Station in 2023 and multiple Metro bus routes; its proximity to existing restaurant, office, retail, entertainment, and residential land uses; and its highly walkable environment support the conclusion that Alternative 4 has been properly designed and located so that its development would achieve a reduction in VMT greater than the regional and Statewide averages.

Section IV.C, *Energy*, of this Draft EIR concludes that the Project’s energy requirements would not substantially affect local and regional supplies or capacity during construction or operation, and that the Project would not cause wasteful, inefficient, or unnecessary consumption of energy during construction or operation and, as such, impacts related to efficient energy consumption would be less than significant. With the change from medical office to residential uses, Alternative 4 would generate a lower level of transportation energy demand than would the Project. Thus, impacts related to efficient energy consumption as with the Project would be less than significant and, because vehicles trips would be less under this alternative, impacts with respect to energy consumption would be less than the Project’s less-than-significant impacts.

(ii) *Conflict with Plans for Renewable Energy or Energy Efficiency*

As with the Project, Alternative 4 is designed in a manner that is consistent with and not in conflict with relevant energy conservation plans that are intended to encourage development that results in the efficient use of energy resources. Alternative 4 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the Title 24 standards and CALGreen Code, which have been incorporated into the Los Angeles Green Building Code as amended by the City, to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Los Angeles Green Building Code). In addition, Alternative 4’s land use characteristics indicate that Alternative 4 has been properly designed and located so that its development would achieve a reduction in VMT greater than the regional and Statewide averages.

Based on the above, Alternative 4 would have a less-than-significant impact regarding the provisions of plans for renewable energy and energy efficiency. As with the Project, the impact of Alternative 4 with respect to compliance with renewable energy and energy efficiency would be less than significant. As Alternative 4 would be in compliance with plans for renewable energy and energy efficiency, impacts under Alternative 4 would be similar to the Project's less-than-significant impacts.

(d) *Geology and Soils*

(i) *Liquefaction*

Alternative 4 would be built within the same boundaries of the Project Site, which include soils potentially susceptible to liquefaction. As with the Project, Alternative 4 would require a deepened foundation system that consists of drilled friction piles, or equivalent foundation system that would be embedded a minimum of 10 feet into the bedrock, which is located 30 feet below ground surface in accordance with the City's building code requirements. Under this design of the deepened foundation system, the friction piles would extend through the potentially liquefiable soil layers and, as such, would not subject the proposed building to liquefaction. Alternative 4 would also comply with LAMC Section 91.7006, which would require this alternative to provide a final, site-specific Geotechnical Report that would include the preliminary recommendations for the Geotechnical Report as well as the final recommendations from the report that would be enforced by the LADBS. As with the Project, through implementation of mitigation measures and adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to liquefaction under Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(ii) *Unstable Geologic Units*

Excavation under Alternative 4, as with the Project, would cause disturbance of existing soils and could, and without code compliance, contribute to potential localized raveling or caving of excavated areas (e.g., the excavated side walls losing stability). However, all required excavations would be sloped and properly shored in accordance with the applicable provisions of the CBC incorporated into the City's Building Code to minimize the potential for site stability hazards during temporary excavation activities. In addition, Alternative 4 would comply with CBC requirements and, prior to issuance of a grading permit, a qualified geotechnical engineer must prepare and submit to the LADBS a Final Geotechnical Report that includes site-specific design recommendations for seismic safety and design requirements for foundations, retaining walls/shoring and excavation to meet applicable State and City code and regulatory requirements. As with the Project, through adherence to the CBC and the recommendations of the Final Geotechnical Report, impacts with respect to geologic units under Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(iii) *Expansive Soils*

Alternative 4 would be built within the same boundaries of the Project Site, which include soils that have a moderate potential for expansion. However, expansive soil hazards would be further evaluated for the Project Site as part of the LADBS approved Final Geotechnical Report that would include site-specific design recommendations for addressing expansive soils, as needed. Further, compliance with standard construction and engineering practices (i.e., on-site excavation requiring suitable engineered stabilization in accordance with the CBC and proper engineering erosion control and proper engineering drainage design), addressing expansive soils and building code regulations pertinent to foundation stability would ensure that expansive soils are removed, as necessary. As such, as with the Project, impacts related to expansive soils under Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(iv) *Paleontological Resources*

Excavation associated with both Alternative 4 and Project would reach depths of approximately 30 feet and would require similar earth movement. As with the Project, excavation under Alternative 4 could have the potential to directly or indirectly destroy a unique paleontological resource not identified in the analysis conducted for the Project Site and, as such, could result in a potentially significant impact. Similar to the Project, implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3 under Alternative 4 would provide for appropriate treatment and/or preservation of resources and would mitigate impacts to paleontological resources to less than significant. Impacts under Alternative 4 would be similar to the Project's less-than-significant impacts with incorporated mitigation.

(e) *Greenhouse Gas Emissions*

The construction and operation of the Project Site under Alternative 4, as with the Project, would increase GHG emissions. The lower mobile emissions associated with Alternative 4 would generate lower GHG emissions than the Project's maximum GHG operational emissions. As with the Project, Alternative 4 would incorporate applicable project design features, including Project Design Feature TRAF-PDF-1, which would encourage residents and employees of the Project to utilize alternative modes of travel by providing bicycle and pedestrian amenities, promoting alternative transportation modes, supporting carpools and rideshares, and implementing an employee parking management program. GHG emission impacts under Alternative 4, as with the Project, would be less than significant. Due to its lower GHG emissions, under Alternative 4 with respect to GHG emissions, impacts on the environment would be less than the Project.

Alternative 4, as with the Project, would be consistent with applicable strategies outlined in CARB's Climate Change Scoping Plan, SCAG's 2020–2045 RTP/SCS, L.A.'s Green New Deal (Sustainability pLAn 2019), and the City's Green Building Code. As such, similar to the Project, impacts related to conflicts with an applicable

plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs would be less than significant under Alternative 4. As discussed in **Section IV.E, Greenhouse Gas Emissions**, of this Draft EIR, the results of the analysis show that with the Project, the employee VMT per capita would be 7.5 compared to the threshold of 7.6. As shown in the Alternatives Transportation Analysis Memo, provided in Appendix L of this Draft EIR, the residential uses proposed under Alternative 4 would generate an average household VMT per capita of 5.3, which falls below the significant criteria impact. As such, because Alternative 4 would result in a reduced VMT rate and would not conflict with applicable GHG plans, similar to the Project, impacts under Alternative 4 with respect to conflicts with GHG plans adopted for the purpose of reducing the emissions of GHGs would be less than significant. As the lower mobile emissions associated with Alternative 4 would generate lower GHG emissions than the Project's maximum GHG operational emissions, impacts related to GHG emissions would be less than the Project's less-than-significant impacts.

(f) *Land Use and Planning*

Alternative 4 proposes 140,305 square feet of residential and ground floor retail-commercial uses, with an approximate FAR of 4.5:1. Similar to the Project, Alternative 4 would also require amending the existing zoning and a general plan amendment to allow for Alternative 4's proposed building height and floor area.

As with the Project, the density and location of Alternative 4 would not conflict with policies of regional and local land use plans adopted to avoid or mitigate environmental effects, including SCAG's 2020–2045 RTP/SCS, City of Los Angeles General Plan Framework Element, Wilshire Community Plan, or LAMC, and, as such, impacts with respect to land use would be less than significant. While changes in zoning or land use designations include the introduction of residential uses on the Project Site, impacts in relation to existing plans that avoid or reduce environmental impacts would be similar to the Project's less-than-significant impacts.

(g) *Noise*

(i) *Noise Levels in Excess of Standards*

(a) *Construction*

Construction activities under Alternative 4 would be similar to those of the Project and would generally include site demolition, site preparation, grading/excavation, drainage/utilities/trenching, building construction, foundation concrete pour, architectural coating, and paving. Similar to the Project, maximum construction activities under Alternative 4 would increase noise levels at several sensitive receptor locations in the vicinity of the Project Site. As with the Project, because the maximum amount of construction equipment operating simultaneously within the Project Site would be constrained by the size of the property, the maximum

construction noise levels under Alternative 4 would be the same as the Project. Based on a conservative impact analysis, in which noise levels were calculated with all pieces of construction equipment operating simultaneously and located at the construction area nearest to the affected receptors, construction noise levels would exceed the applicable noise significance thresholds at several nearby noise sensitive receptors. Therefore, as with the Project, Mitigation Measures NOI-MM-1 through NOI-MM-4 would be implemented under Alternative 4 to reduce construction noise impacts at off-site noise sensitive receptors to the extent technically feasible. However, with implementation of technically feasible mitigation, construction noise impacts at noise-sensitive receptors would still exceed the significance threshold. Therefore, as with the Project, construction noise impacts associated with on-site noise sources would remain temporarily significant and unavoidable for Alternative 4. Similar to the Project, maximum construction traffic would not result in significant noise levels (greater than five dBA L_{eq}) compared to existing traffic noise levels along any of the studied roadway segments, and impacts would be less than significant. Alternative 4 would require similar earth movement as the Project and would develop the same square footage as the Project. As such, the overall length and intensity of construction would be similar to that of the Project. Therefore, the duration of construction noise exceedance levels would be similar and impacts related to construction noise under Alternative 4 would be similar to the Project's significant and unavoidable impacts.

(b) Operation

Alternative 4, as with the Project, would increase off-site traffic and generate on-site composite noise associated with fixed equipment, outdoor spaces, parking facilities, loading docks and refuse collection, and emergency generators. However, Alternative 4 includes the development of residential uses, which generates fewer overall off-site vehicle trips. Therefore, operational mobile source noise impacts would be incrementally less under Alternative 4 than the Project. As the Project would not exceed the significance thresholds for off-site traffic noise, off-site traffic noise impacts under Alternative 4 would also not exceed any significance thresholds and impacts would be less than significant.

Under Alternative 4, fixed mechanical equipment, loading docks and refuse collection, and emergency generators would be located in similar locations as the Project and would include similar enclosures. As with the Project, noise levels from these noise sources under Alternative 4 would be less significant. In addition, as the residential uses require more outdoor open space, the occupant load of outdoor spaces under Alternative 4 would incrementally increase the noise generated by outdoor spaces. However, accounting for distance attenuation and barrier-insertion loss by the existing buildings, it is not anticipated that the increased occupant load within the outdoor spaces proposed under Alternative 4 would increase the ambient noise levels greater than five dBA and would not result in noise levels above the applicable standards. As such, outdoor noise generated

under Alternative 4 would similarly be less than significant. Furthermore, parking under Alternative 4 would be provided in above ground parking levels, as with the Project; these parking areas would be completely enclosed on all sides and, therefore, noise generated within the parking areas would be shielded from off-site sensitive receptor locations in the immediate vicinity of the Project Site. Impacts from parking facilities under Alternative 4, as with the Project, would be less than significant. Overall, composite operational noise levels would be less than significant. Given the reduced number of vehicle trips, but incrementally increased outdoor noise sources under Alternative 4, impacts would be similar to the Project's less-than-significant impacts.

(ii) *Groundborne Vibration*

(a) Construction

Construction of Alternative 4, as with the Project, would generate groundborne construction vibration from the operation of heavy equipment (e.g., backhoe, dozer, excavators, drill rig, loader, scraper, and haul trucks). As with the Project, the estimated vibration velocity levels from all construction equipment (maximum construction conditions) under Alternative 4 would be below the structural damage significance criteria at off-site building structures. In addition, as with the Project, the structural damage vibration impacts from off-site construction traffic would also be below the structural damage significance criteria. Therefore, on-site and off-site vibration impacts pursuant to the significance criteria for building damage would be less than significant.

Regarding human annoyance, as with the Project, the estimated vibration levels due to construction equipment would exceed the vibration significance threshold for human annoyance at receptors V1, V3, and V4. Therefore, the on-site vibration impacts pursuant to the significance criteria for human annoyance during construction of Alternative 4 would be potentially significant. However, similar to the Project, there are no feasible mitigation measures that could be implemented to reduce the temporary vibration impacts from on-site construction associated with human annoyance at the vibration-sensitive receptors V1, V2, V3, V4 and V5. As with the Project, construction vibration levels would be significant and unavoidable under Alternative 4. As the duration of construction and overall construction activity causing vibration would be the same as under the Project, and impacts under Alternative 4 would be similar to the Project's significant and unavoidable impacts.

(b) Operation

Day-to-day operations under Alternative 4, as with the Project, would include typical commercial-grade stationary mechanical and electrical equipment, which would produce vibration at low levels that would not cause damage or annoyance impacts to on-site or off-site environment. Primary sources of transient vibration would include vehicle circulation within the proposed parking areas. It is anticipated

that mechanical equipment, including air handling units, condenser units, and exhaust fans, under Alternative 4, as with the Project, would be located on building rooftops. Therefore, as with the Project, groundborne vibration from the operation of such mechanical equipment under Alternative 4 would not impact any of the off-site sensitive receptors. Thus, similar to the Project, operational vibration impacts under Alternative 4 would be less than significant. As with the Project, off-site groundborne operation vibration is not anticipated to be perceptible under Alternative 4, and, as such, impacts under Alternative 4 would be similar to the Project's less-than-significant impacts.

(h) *Public Services*

(i) *Fire Protection*

Alternative 4, as with the Project, would involve construction activities and intensify the use of the Project Site so that it would increase demand on fire protection and emergency medical services, as well as potentially reduce emergency access. Alternative 4, as with the Project, would incorporate Project Design Feature TRAF-PDF-2 to provide a Construction Traffic Management Plan to minimize disruptions to traffic flow and maintain emergency vehicle access to the Project Site and neighboring land uses. Project Design Feature TRAF-PDF-3 would identify alternate parking location(s) and the method of transportation to and from the Project Site. The implementation of these project design features would facilitate emergency access. As such, similar to the Project, construction under Alternative 4 would result in less-than-significant impacts with respect to performance objectives for fire protection.

During operation, Alternative 4 would result in a direct residential population increase of 193 residents⁶ and the indirect employee population would be reduced from 48 employees under the existing uses to 11 employees related to the retail/restaurant uses for a combined (residential and employee) net population increase of 156 persons. By comparison, the Project would result in a net population increase of 566 employees. Alternative 4, as with the Project, would comply with the applicable OSHA, Building Code, Fire Code, other LAMC, and LAFD requirements and recommendations, which would reduce demand on LAFD facilities and equipment without creating the need for new or expanded fire facilities. In addition, as the Project Site is not located with the distance standards of an Engine Company or Truck Company, automatic fire sprinklers would be required to be installed under Alternative 4. However, as the Project Site is located within a highly urbanized area accessed via an established street system, impacts on emergency response would not be significant. Alternative 4, as with the Project, would also be consistent with LAMC fire flow requirements. As such, Alternative 4, would not result in substantial adverse physical impacts associated with the

⁶ 2.41 persons per dwelling unit X 80 dwelling units = 193 persons. Persons per dwelling unit rate based on the 2018 Census American Community Survey 5-Year Estimate data (2014–2018).

provision of or need for new or altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives. Impacts under Alternative 4, as with the Project, would be less than significant. As the Project would introduce residential uses, the occurrence of fires from residential uses would increase; however, Project Site occupancy (both direct and indirect) would be reduced as compared to the Project. Therefore, impacts related to fire protection services under Alternative 4 would be similar to the Project's less-than-significant impacts.

(ii) *Police Protection*

Alternative 4, as with the Project, would result in construction and operation activities that could affect emergency access and increase demand for police protection services. As with the Project, Alternative 4's construction phase, although of shorter duration than that of the Project, could increase in demand for police protection services. To reduce LAPD demand during construction, Alternative 4, as with the Project, would implement a number of security measures under Project Design Feature POL-PDF-1 to limit access to construction areas, including private security, construction fencing, and locked entry. Similar to the Project, construction activities under Alternative 4 may involve temporary partial lane closures or increase travel time due to flagging or stopping traffic to accommodate trucks entering and exiting the Project Site. As with the Project, Alternative 3 would implement Project Design Features TRAF-PDF-2 and TRAF-PDF-3. Under Project Design Feature TRAF-PDF-2, a Construction Traffic Management Plan would ensure that adequate and safe access remains available at the Project Site during construction activities. Project Design Feature TRAF-PDF-3 would implement a Construction Worker Parking Plan to identify and enforce parking location requirements for construction workers. Furthermore, it is not anticipated that any additional officers from LAPD would be needed to monitor the Project Site during construction outside of the existing officers that patrol the area. Additionally, the various safety and control features that would be implemented during construction would reduce the potential for incidents that would require police responses.

As the development of Alternative 4 includes residential uses and retail/restaurant uses, the Project would have both a direct and indirect population increase. For residential uses, the direct population increase would be 320 persons.⁷ The retail/restaurant uses would include an indirect population increase of 15 persons. Accounting for the indirect population of 42 persons under the existing uses, Alternative 4 would have a net increase the LAPD service population by 293. As

⁷ 4 persons per unit X 80 units = 320 persons. Persons per unit rate based on the 2006 L.A. CEQA Threshold Guide police service population conversion factors for three-, four-bedroom units.

discussed in **Section IV.H.2, Public Services - Police Protection**, LAPD does not provide crime rates for non-resident population. For the new residential population generated by Alternative 4 (i.e., 320 persons), Alternative 4 could generate an additional nine crimes per year in the Wilshire Community Area.⁸ The new residents generated by Alternative 4 would result in an officer-to-resident ratio of 1:935 and would require an additional 0.34 officers to maintain the existing ratio of 1:933.⁹ LAPD does not provide crime rates for non-resident population; rather, crime associated with non-resident population is incorporated into the overall community service ratio based on the residential population. As Project does not include any direct population increase, the officer to resident population ratio of 1:933 for the Wilshire Community Area would be maintained under operation of the Project. As with the Project, demand for police services under Alternative 4 would be reduced with implementation of Project Design Feature POL-PDF-2, which includes the implementation of operational security features such as gated entries, keycard access, and CCTV, which would help to offset the Project's operational demand for police protection services from LAPD. While Alternative 4 includes a direct population increase, development of Alternative 4 would not increase police services demand to the extent that the addition of a new police facility, or the expansion, consolidation or relocation of an existing facility would be required to maintain service. As such, Alternative 4, as with the Project, would not result in potential physical impacts associated with construction of police facilities and impacts with respect to police protection would be less than significant. However, with the increase in direct population as compared to the Project, impacts to police protection services under Alternative 4 would be greater than the Project's less-than-significant impacts.

(i) *Transportation*

(i) *Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities*

Similar to the Project, Alternative 4 would support multimodal transportation options and a reduction in VMT, as well as promote transportation-related safety in the Project area. Alternative 4, as with the Project, would not conflict with policies of Mobility Plan 2035. In addition, Alternative 4 would be consistent with applicable transportation goals of the Wilshire Community Plan. As with the Project, Alternative 4 would implement Project Design Feature TRAF-PDF-1, which would encourage residents and employees of the Project to utilize alternative modes of travel by providing bicycle and pedestrian amenities, promoting alternative

⁸ 320 new residents X 26 crimes/1,000 residents = nine additional crimes per year.

⁹ 249,200 existing residents + 320 new residents = 249,520 residents/267 existing officers = one officer per 935 residents. 320 new residents X (one officer per 933 residents) = 0.34 additional officers.

transportation modes, supporting carpools and rideshares, and implementing an employee parking management program. Alternative 4, as with the Project, would not conflict with any of the policies and procedures contained in the LADOT Manual of Policies and Procedures; with Vision Zero to reduce traffic-related deaths; and with LAMC Section 12.21.A.16 and LAMC Section 12.26J. Consistent with Plan for a Healthy Los Angeles, Alternative 4 would prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements and providing direct connections to pedestrian amenities at adjacent intersections. Alternative 4 would also be consistent with Citywide Design Guidelines as they relate to Pedestrian-First Design. Alternative 4 would implement many of the key features identified in the Mobility Hubs Reader's Guide, including LAMC-required short-term and long-term bicycle parking that both facilitates and encourages bicycling in and around the Project Site. Similar to the Project, Alternative 4 would not conflict with programs, plans, ordinances or policies addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities and, as such, impacts relative to plans and programs would be less than significant and similar to the Project's less-than-significant impacts.

*(ii) Consistency with CEQA Guidelines
Section 15064.3, Subdivision (b)*

As analyzed within **Section IV.I, Transportation**, the Project would generate 7.5 work VMT per employee, which is below the threshold of significance for the Central APC of 7.6 work VMT per employee. As shown in the Alternatives Transportation Analysis Memo, provided in Appendix L of this Draft EIR, the residential uses proposed under Alternative 4 would generate an average household VMT per capita of 5.3, which falls below the significant criteria impact. Note that Alternative 4, as with the Project, is exempt from evaluation of the retail VMT, because the retail component under Alternative 4 is less than 50,000 square feet and considered local-serving. As average household VMT is below the Central APC thresholds, impacts with respect to CEQA Guidelines Section 15064(b) would be less than significant for Alternative 4, as with the Project. Further, as Alternative 4 would have a reduced VMT compared to that of the Project, impacts would be less than the Project's less-than-significant impacts.

(j) Tribal Cultural Resources

The records search results for the Project Site indicates that no archaeological resources have been recorded within the Project Site or a 0.5-mile radius. In addition, the results of the SLF search conducted by the NAHC indicate that Native American cultural resources are not known to be located within the Project Site. No known tribal cultural resources have been identified as a result of the research or consultation with the tribes. However, as with the Project, excavations associated with Alternative 4 could have a potential, albeit a low potential, to encounter previously unknown and buried tribal cultural resources. However, similar to the Project, in the event that buried tribal cultural resources are

encountered during construction under Alternative 4, the Project Applicant will be required to comply with the City's standard Conditions of Approval for the treatment of inadvertent tribal cultural resource discoveries. With compliance with the City's standard Conditions of Approval, Alternative 4, as with the Project, would result in less-than-significant impacts to tribal cultural resources and impacts would be similar to the Project's less-than-significant impacts.

(3) Relationship of the Alternative to Project Objectives

As described above, Alternative 4, the Residential Mixed-Use Alternative, would consist of a 12-story, 145,305-square-foot residential and retail-commercial building, consisting of 140,305 square feet of residential uses and 5,000 square feet of ground floor retail-commercial uses. Alternative 4 would include residential uses rather than medical office uses. The proposed building under Alternative 4 would have a similar number of stories and slightly reduced height as proposed under the Project.

Alternative 4 would create jobs with construction of the proposed building as well as incorporate green building design and active the ground floor with commercial uses. As such, Alternative 4 is considered to be fully consistent with the following objectives:

1. Encourage economic growth in the community through the creation of construction jobs and full-time, on-site jobs.
3. Incorporate sustainable and green building design and construction that exceed building code and Title 24 requirements in areas related to landscape design (green roofs/balconies) to incorporate ecofriendly building materials, systems and features, solar efficiency (solar ready roofs), efficient and low flow water management non-VOC paints and adhesives, high-performance building envelope and energy efficient building systems.
6. Enhance the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area.

While Alternative 4 does not propose medical office uses, Alternative 4 is a mixed-use project within a TPA. As such, it would not meet the following objective to the same extent as under the Project and is, thus, considered to be only partially consistent with the following objective:

4. Develop the site with a well-designed commercial and medical office project within a transit priority area which would maximize the benefit of nearby Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, an Antelope Valley Transit Authority (AVTA) bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station (expected to open in 2023) and, thus, would support smart growth with the intent of reducing air quality emissions and VMT generation.

As Alternative 4 would not include medical office uses, and, as such, would not meet the following objectives:

2. Redevelop the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities to serve the local community and regional area near a key regional medical center.
5. Construct a medical office building at an intensity consistent with the zoning for commercial buildings on Wilshire Boulevard which include similar mid-rise office buildings in proximity of transit and along corridors.

7. Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

Selection of an environmentally superior alternative is based on comparison of the four alternatives that would reduce or eliminate the significant impacts associated with the Project, and on a comparison of the remaining environmental impacts of each alternative to the Project. The comparative impacts of the Project and the Project Alternatives are summarized in **Table V-2, Comparison of Impacts Associated with the Alternatives and the Project**, below.

Of the alternatives analyzed in this Draft EIR, Alternative 1, No Project/No Build Alternative would be considered the environmentally superior because it would avoid the Project’s significant and unavoidable impacts to construction noise and vibration. However, because no new development would occur and because Alternative 1 would not meet any of the Project Objectives, the identification of another environmentally superior alternative is required.

As shown in Table V-2, Alternative 2, the Development under Existing Zoning Alternative would reduce most of the Project’s less-than-significant impacts. However, Alternative 2 would require more excavation as subterranean parking and relocation of the underground groundwater channel would be required to accommodate a portion of the vehicle parking spaces provided under this alternative. As such, impacts directly related to ground disturbance, including archaeological, paleontological, and tribal cultural resources, would be greater under this alternative. In addition, Alternative 2 would not reduce the Project’s significant and unavoidable impacts related to construction noise and vibration. However, this alternative would reduce the duration of construction activity in which the significant and unavoidable impacts would occur. Alternative 2 would fully meet

three of the Project's objectives and only partially meet the remaining three objectives.

Alternative 3, the Reduced Square Footage Alternative, as a reduced-scale development having an FAR of 3.4:1 compared to the Project's FAR of 4.5:1, would also reduce many of the Project's less-than-significant impacts, as shown in Table V-2. No impacts under this alternative would be greater than the Project. As with Alternative 2, significant and unavoidable noise and vibration impacts under Alternative 3 would not be reduced to less-than-significant levels. Although Alternative 3, would not reduce environmental impacts to the same extent as under Alternative 2, it would reduce the overall scale of development and the range of impacts associated with construction duration compared to the Project. Similar to Alternative 2, Alternative 3 would fully meet three of the Project's objectives and only partially meet the remaining three objectives.

Alternative 4, the Residential Mixed-Use Alternative, would include the development of residential and retail/commercial uses rather than medical office and retail/commercial uses. The building square footage would be the same as compared to the Project (145,305 square feet), but the height of the building would be reduced from 230 feet to 191 feet, due to the reduced ceiling requirements for residential uses. As shown in Table V-2, more than half of the alternative's less-than-significant impacts would be similar to the impacts under the Project as many of the impacts related to construction and ground disturbance would be similar to the Project. As such, the significant and unavoidable noise and vibration impacts under Alternative 4 would be similar to the Project and would not be reduced to less-than-significant levels. Alternative 4 would result in a reduced VMT rate as compared to the Project's VMT rate. However, the change in uses as proposed under this alternative would also result in greater police protection impacts. As Alternative 4 proposes the development of residential uses rather than medical office uses, most of the Project's objectives would not be met, with three fully met and one partially met by this alternative.

Because Alternative 3 would reduce many of the Project's less-than-significant impacts, as shown in Table IV-2, would not have any impacts greater than the Project, which is not the case under Alternative 2 and Alternative 4, and would either fully or partially meet all of the Project's objectives, Alternative 3 is considered to be the Environmentally Superior Alternative.

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Impact	Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Square Footage	Alternative 4: Residential Mixed-Use
Air Quality					
Consistency with Air Quality Management Plan	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standard Construction	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Cumulative Increase in Criteria Pollutants/Violation of Air Quality Standard Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Localized Emissions	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)
Carbon Monoxide Hotspots	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Toxic Air Contaminants Construction	Less than Significant with Mitigation	Less (No Impact)	Less (Less than Significant with Mitigation)	Less (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Toxic Air Contaminants Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Cultural Resources					
Historical Resources	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Archaeological Resources	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Impact	Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Square Footage	Alternative 4: Residential Mixed-Use
Energy					
Efficient Energy Consumption	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Geology and Soils					
Liquefaction	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Unstable Geologic Units	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Expansive Soils	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Paleontological Resources	Less than Significant with Mitigation	Less (No Impact)	Greater (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)	Similar (Less than Significant with Mitigation)
Greenhouse Gas Emissions					
Greenhouse Gas Impacts	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Land Use and Planning					
Land Use and Planning Impacts	Less than Significant	Less (No Impact)	Less (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Noise					
Noise Levels in Excess of Standards Construction	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)

TABLE V-2
COMPARISON OF IMPACTS ASSOCIATED WITH THE ALTERNATIVES AND THE PROJECT

Impact	Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Development under Existing Zoning	Alternative 3: Reduced Square Footage	Alternative 4: Residential Mixed-Use
Noise Levels in Excess of Standards Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Groundborne Vibration Construction	Significant and Unavoidable with Mitigation	Less (No Impact)	Less (Significant and Unavoidable with Mitigation)	Less (Significant and Unavoidable with Mitigation)	Similar (Significant and Unavoidable with Mitigation)
Groundborne Vibration Operation	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Public Services					
Fire Protection	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Similar (Less than Significant)
Police Protection	Less than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Greater (Less than Significant)
Transportation					
Conflict with Programs, Plans, Ordinances or Policies Addressing the Circulation System, Transit, Roadways, Bicycle and Pedestrian Facilities	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
Consistency with CEQA Guidelines Section 15064.3, Subdivision (b)	Less than Significant	Less (No Impact)	Similar (Less than Significant)	Similar (Less than Significant)	Less (Less than Significant)
Tribal Cultural Resources					
Tribal Cultural Resources Impacts	Less than Significant	Less (No Impact)	Greater (Less than Significant)	Similar (Less than Significant)	Similar (Less than Significant)
SOURCE: ESA, 2020.					

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