

V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

Direction regarding the consideration and discussion of project alternatives in an EIR is provided in CEQA Guidelines Section 15126.6(a) as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.

The CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability 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. 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 addressed. In selecting project alternatives for analysis, potential alternatives 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 [...], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [...]

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a “no project” alternative and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives considered.

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to avoid or substantially lessen any of the significant effects of a project while still feasibly obtaining most of the basic project objectives. Based on the analyses provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant impacts that cannot be feasibly mitigated with respect to on- and off-site noise sources (water main line improvements) during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Cumulative impacts associated with on- and off-site noise during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also be significant and unavoidable.

Based on the significant environmental impacts of the Project, the basic objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the alternatives considered, the alternatives to the Project listed below were selected for evaluation.

- **Alternative 1—No Project Alternative:** Alternative 1, the No Project Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today.
- **Alternative 2—Reduced Density Alternative:** Alternative 2, the Reduced Density Alternative, would include the same uses proposed under the Project while reducing the amount of total construction of new floor area proposed under the Project by approximately 25 percent. Specifically, upon completion, Alternative 2 would result in a total floor area of 328,673 square feet, with an approximate floor area ratio (FAR) of 5.64:1, and a maximum building height of 35 stories at

approximately 398 feet. Comparatively, the Project would include a total floor area of 420,201 square feet, with an overall FAR of 7.5:1, and a maximum building height of 43 stories at approximately 530 feet.

- **Alternative 3—Reduced Excavation Alternative:** Alternative 3, the Reduced Excavation Alternative, would include the same uses proposed by the Project while eliminating the subterranean parking. Specifically, all parking for the proposed uses would be provided within nine above-grade parking levels. Upon completion, the height of the building would be a maximum height of 50 stories and 570 feet. Overall, this alternative would reduce the amount of export estimated for the Project from approximately 115,796 cubic yards to 12,753 cubic yards (a reduction of 103,043 cubic yards). The remaining project components, and approximate FAR, would be the same as the Project.

Table V-1 on page V-4 provides a comparison of the Project and the three alternatives being considered. Each of these alternatives is described further in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such rejected alternatives are described below.

Table V-1
Summary Comparison of Development Proposed under the Alternatives to the Project

	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Excavation Alternative
Retail	—	—	—	—
Restaurant	36,737 sf ^b	—	36,075 sf ^b	36,737 sf ^b
Office	8,000 sf ^b	—	8,000 sf ^b	8,000 sf ^b
Residential	375,464 sf (419 du)	—	281,598 sf (314 du)	375,464 sf (419 du)
Existing Square Footage to be Removed	6,137 sf	—	6,137 sf	6,137 sf
Existing and Reconfigured Floor Area to Remain	42,092 sf	—	42,092 sf	42,092 sf
Proposed New Construction Floor Area	378,109 sf		283,581 sf	378,109 sf
Total Floor Area Upon Completion (New + Existing and Reconfigured Floor Area to Remain)	420,201 sf	—	325,673 sf	420,201 sf
Approximate FAR	7.51:1	—	5.64:1	7.51:1
Total Parking	443 spaces	—	332 spaces	443 spaces
Maximum Height	530 ft (43 levels)	—	398 ft (35 levels)	570 ft (50 levels)
Maximum Depth of Excavation	80 ft below grade (4 subterranean levels)	—	60 ft below grade (3 subterranean levels)	40 ft below grade (no subterranean levels, excavation limited to building foundations)
Soil Export	115,796 cy		86,847 cy	57,898 cy
<i>sf = square feet</i>				

Table V-1 (Continued)
Summary Comparison of Development Proposed under the Alternatives to the Project

	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Excavation Alternative
<i>du = dwelling unit</i> <i>ft = feet</i> <i>cy = cubic yards</i> ^a <i>Square footage is calculated pursuant to the Los Angeles Municipal Code (LAMC) definition of floor area for the purpose of calculating FAR. In accordance with LAMC Section 12.03, floor area is defined as “[t]he area in square feet confined within the exterior walls of a building, but not including the area of the following: exterior walls, stairways, shafts, rooms housing building-operating equipment or machinery, parking areas with associated driveways and ramps, space for the landing and storage of helicopters, and basement storage areas.”</i> ^b <i>Square footage reflects proposed floor area upon completion (existing and reconfigured floor area to remain + proposed new construction floor area).</i> <i>Source: Eyestone Environmental, 2026.</i>				

3. Alternatives Considered and Rejected as Infeasible

As set forth in CEQA Guidelines Section 15126.6(c), the range of potential alternatives to a proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant impacts. As further set forth in CEQA Guidelines Section 15126.6(c), the EIR should briefly describe the rationale for selecting the alternatives to be discussed as well as identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, among the factors that may be used to eliminate an alternative from detailed consideration are 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. Based on the CEQA Guidelines, the alternatives that have been considered and rejected include the following:

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 impacts associated with on- and off-site noise during construction (Project-level and cumulative) and on- and off-site vibration with regard to human annoyance (Project-level and cumulative). The following approaches were considered to avoid or reduce these impacts:

- Approach (a)—Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project was reviewed and rejected as infeasible for the following reasons:
 - Construction noise levels are dependent on the type and number of pieces of construction equipment operating simultaneously (on-site equipment). It is anticipated that the daily number of on-site construction equipment and off-site construction trips would be reduced under this approach as construction activities would be extended over a longer duration. Typically, a reduction of 50 percent in the number of pieces of construction equipment would be required to reduce the construction-related noise levels by 3 dBA (just perceptible). For example, a reduction from 23 pieces to 12 pieces of construction equipment (an approximate 48-percent reduction) for the building construction phase would reduce the construction noise level at the off-site receptors by 0.1 dBA L_{eq} at receptor location R1 and 1.4 dBA L_{eq} at receptor location R2 (as compared to the Project). However, the estimated construction noise levels with a 48-percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 17.0 dBA L_{eq} at receptor location R1, and 0.2 dBA L_{eq} at receptor location R2 during the building construction phase. Therefore, while the construction noise levels under this approach would be less than the Project (depending on the amount

of reduction), the construction-related noise levels would still exceed the significance threshold. In addition, this approach would be inefficient as it would not maximize the use of construction equipment to advance construction completion and would increase the number of days that sensitive receptors would be impacted by construction activities. Furthermore, due to the proximity of the off-site noise sensitive receptors and the proposed building heights, it would not be practical to reduce the construction noise levels below the significance threshold by further extending the duration of construction (and reducing the number of pieces of construction equipment) as even a single piece of equipment would result in noise levels above the significance threshold. As such, while the on-site construction noise impacts under this approach would be less than those of the Project, such impacts would remain significant.

- The on-site construction vibration impacts (human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and the extended construction duration approach would utilize similar construction equipment to the Project (e.g., drill rig and large bulldozer) during the site grading/excavation phase. Since the same types of construction equipment would be used, vibration levels would be similar to the Project. In addition, because the haul routes would be the same, off site construction vibration impacts (human annoyance) due to heavy trucks traveling by sensitive receptors would also continue to be significant, similar to the Project.
- Approach (b)—Central Location of Development: An approach where the proposed construction activities and development are moved closer to the center of the Project Site, creating a greater distance between the proposed development and associated construction activities and the off-site sensitive receptors, was reviewed and rejected as infeasible for the following reasons:
 - An alternative with a smaller building footprint could potentially reduce the Project's construction-related on-site noise impacts by providing greater separation distances between the on-site construction noise sources and the off-site receptor locations. Under this approach, construction activities would be located approximately 50 feet closer to the center of the Project Site. Construction-related on-site noise impacts with an additional 50-foot distance from construction activities would be reduced by approximately 14 dBA at receptor location R1, but would remain significant even with implementation of a noise barrier, which could provide a maximum 20 dBA noise reduction.

With respect to the on-site vibration impacts, moving the development by approximately 50 feet inward, would reduce the vibration levels at receptor location R1 to 75.6 VdB, which would still exceed the 72 VdB significance threshold.

In addition, this alternative would significantly reduce the buildable area on the Project Site to the extent that an economically viable project could not be developed. Therefore, this alternative to eliminate the Project's significant on-site construction noise and vibration impacts has been rejected from further consideration in this Draft EIR.

- Because the haul routes would remain the same, the off-site construction vibration impacts (human annoyance) due to heavy trucks traveling by sensitive receptors would be significant, similar to the Project.

Alternative Project Site: The Applicant owns the Project Site, and its location is conducive to the development of a mixed-use project. The Project Site is located in the Miracle Mile district of the Wilshire Community Plan area, and is surrounded primarily by a mix of low- to high-rise commercial and residential uses. These uses make the Project Site particularly suitable for high-density multi-family housing uses and ground floor commercial space. The Project Site is also well-served by transit. The Applicant does not own another site with similar existing conditions in a similar area. Furthermore, the Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Given its urban location, if an alternative site in the Wilshire Community Plan Area that could accommodate the Project could be found, it would be expected that the significant and unavoidable construction noise and vibration impacts due to construction of the Project would also occur at an alternative site. Therefore, an alternative site is not considered feasible as the Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid the Project's significant impacts. Thus, in accordance with CEQA Guidelines Section 15126.6(f), the alternative site alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the Project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.¹ The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that each alternative (with the exception of the No

¹ State of California, CEQA Guidelines Section 15126.6(c).

Project Alternative) would implement the same project design features (PDFs) and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.

- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue as follows:
 - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided in Table V-2 on page V-10.

**Table V-2
Comparison of Impacts Associated with the Alternatives**

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Excavation Alternative
A. AIR QUALITY				
<i>Regional Emissions</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Localized Emissions</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Toxic Air Contaminants</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
B. CULTURAL RESOURCES				
<i>Historical Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Archaeological Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
C. ENERGY				
<i>Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Excavation Alternative
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GEOLOGY AND SOILS				
<i>Paleontological Resources</i>	Less Than Significant with Mitigation	Less (No Impact)	Less (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
E. GREENHOUSE GAS EMISSIONS				
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
F. LAND USE AND PLANNING				
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
G. NOISE^a				
<i>Construction</i>				
<i>On-Site Noise</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>Off-Site Noise</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Excavation Alternative
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Less (Less Than Significant with Mitigation)
<i>Off-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable)
Operation				
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Vibration</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
H. PUBLIC SERVICES				
Fire Protection				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Police Protection				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Excavation Alternative
I. TRANSPORTATION				
<i>Conflict with Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Freeway Safety Analysis</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
J. TRIBAL CULTURAL RESOURCES				
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
K. UTILITIES AND SERVICE SYSTEMS				
<i>Water Supply and Infrastructure</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Wastewater</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
<i>Energy Infrastructure</i>				
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)

Table V-2 (Continued)
Comparison of Impacts Associated with the Alternatives

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Density Alternative	Alternative 3: Reduced Excavation Alternative
^a Cumulative on- and off-site noise impacts and cumulative on- and off-site vibration impacts with respect to human annoyance during Project construction would be significant and unavoidable. Also, off-site noise impacts would be significant and unavoidable during installation of water conveyance improvements. Source: Eyestone Environmental, 2026.				

V. Alternatives

A. Alternative 1: No Project Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project Alternative, assumes that the Project would not be approved, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they are today. Specifically, the existing buildings and surface parking would remain unchanged by Alternative 1.

2. Environmental Impacts

a. Air Quality

(1) Consistency with Air Quality Plans

Alternative 1 would not alter the existing on-site uses or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in air quality impacts that could result in a potential conflict with the goals and policies of the South Coast Air Quality Management District’s (SCAQMD’s) Air Quality Management Plan (AQMP) or the City of Los Angeles General Plan. Thus, no impacts would occur, and such impacts would be less than the less-than-significant impacts associated with the Project.

(2) Regional Emissions

(a) Construction

Alternative 1 would not alter the existing on-site uses or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with the use of heavy-duty construction equipment, vehicle trips generated from haul trucks and construction workers traveling to and from the Project Site, or fugitive dust from demolition and construction activities. No construction-related regional air quality impacts would occur. Thus, impacts related to regional emissions during

construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. As such, no operational air quality impacts associated with regional emissions would occur. Thus, impacts related to regional emissions during operation would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(3) Localized Emissions

(a) Construction

As indicated previously, Alternative 1 would not result in any construction emissions associated with the use of heavy-duty construction equipment, vehicle trips generated from haul trucks and construction workers traveling to and from the Project Site, or fugitive dust from demolition and construction activities. Therefore, construction-related localized air quality impacts would not occur. Thus, impacts related to localized emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses. Therefore, no operational air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

(4) Toxic Air Contaminants

(a) Construction

Since construction activities would not occur on the Project Site, Alternative 1 would not result in diesel particulate emissions during construction that could generate substantial toxic air contaminants (TACs). As such, no impacts associated with the construction-related release of TACs would occur under Alternative 1. Therefore, the construction-related TACs impacts of this alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site. As such, no increase in mobile source emissions and their associated TACs would be generated under Alternative 1, and no impact would occur. Therefore, the operational TACs impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are historical resources on the Project Site. These include contributing buildings to the Miracle Mile Historic District and The Darkroom Historic-Cultural Monument (HCM). No demolition, grading, or other earthwork activities that could potentially affect these resources would occur under Alternative 1. Therefore, no impact on historical resources would occur. As such, impacts to historical resources under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Alternative 1 would not result in new development that would require grading or earthwork activities. As such, Alternative 1 would not result in the potential discovery of previously unknown archaeological resources. No impacts associated with archaeological resources would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Construction activities would not occur under Alternative 1. As such, Alternative 1 would not generate a short-term demand for energy during construction, which could result in the wasteful, inefficient, or unnecessary consumption of energy resources, and no impacts would occur. Therefore, the construction-related energy impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources. As such, impacts would be less when compared to the less-than-significant impacts of the Project.

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

Alternative 1 would not involve any new development or modify existing onsite uses. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans would occur under this alternative. Therefore, impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

Alternative 1 would not result in new development that would require grading or earthwork activities. As such, Alternative 1 would not result in the potential discovery of previously unknown paleontological resources. No impacts associated with paleontological resources would occur under Alternative 1, and impacts would be less than the impacts of the Project, which would be less than significant with mitigation.

e. Greenhouse Gas Emissions

Alternative 1 would not develop new or different uses on the Project Site. As such, no new greenhouse gas (GHG) emissions beyond what is currently generated by the existing uses on the Project Site would be generated under Alternative 1. Therefore, no impacts related to GHG emissions would occur, and the GHG impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

f. Land Use and Planning

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing Project Site. No impacts associated with conflicts with land use plans or regulations would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

No new construction activities would occur under Alternative 1. As such, no construction-related noise would be generated on- or off-site under this alternative, and no construction noise impacts would occur. As such, Alternative 1 would eliminate the significant and unavoidable on- and off-site construction noise impacts (Project-level and cumulative), and impacts would be less when compared to the impacts of the Project.

(b) Operation

Alternative 1 would not develop new or different uses on the Project Site, and no changes to existing site operations would occur. Thus, no new stationary or mobile (e.g., traffic) noise sources would be introduced to the Project Site or the vicinity of the Project Site under this alternative. As such, no impacts associated with operational on-site and off-site noise would occur under Alternative 1. Therefore, the operational on-site and off-site noise impacts of Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

No new construction activities would occur under Alternative 1. Therefore, no construction-related vibration would be generated on-site or off-site under Alternative 1, and no construction-related vibration impacts would occur. As such, Alternative 1 would eliminate the significant and unavoidable on- and off-site construction vibration impacts with respect to human annoyance (Project-level and cumulative) as well as the Project's less-than-significant with mitigation on- and off-site construction vibration impacts related to building damage.

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new on- or off-site vibration sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on- and off-site vibration would occur under Alternative 1, and such impacts would be less when compared to the less-than-significant impacts of the Project.

h. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not include any construction activities, it would not result in a construction-related demand for Los Angeles Fire Department (LAFD) fire protection facilities or services. Therefore, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing on-site land uses or operations would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the LAFD stations that serve the Project Site. No impacts to fire protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As Alternative 1 would not include any construction, it would not result in a construction-related demand for police protection facilities or services from the Los Angeles Police Department (LAPD). Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing on-site land uses or operations would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the LAPD stations that serve the Project Site. No impacts to police protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

i. Transportation

Since Alternative 1 would not develop new land uses on the Project Site or change the existing onsite uses, Alternative 1 would not generate any additional vehicle trips or vehicle miles traveled (VMT). Alternative 1 also would not alter existing access or circulation

within the Project Site. Therefore, no transportation impacts would occur under Alternative 1, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; VMT; and freeway off ramp safety. Impacts would be less than the less-than-significant impacts of the Project.

j. Tribal Cultural Resources

Grading and other earthwork activities would not occur under Alternative 1. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. As such, impacts under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term water demand on the Project Site. No operational impacts to water supply and water infrastructure would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate wastewater during construction and construction-related impacts to wastewater conveyance and treatment facilities would not occur. As such, Alternative 1 impacts related to wastewater would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase operational wastewater flows from the Project Site. Since no operational impacts related to wastewater conveyance and treatment facilities would occur, Alternative 1 impacts related to wastewater would be less when compared to the less-than-significant impacts of the Project.

(3) Energy Infrastructure*(a) Construction*

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not generate a short-term demand for energy during construction, and construction-related impacts to energy infrastructure would not occur. As such, impacts related to energy infrastructure under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. Since no operational impacts related to energy infrastructure would occur under Alternative 1, impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 1 would eliminate the Project's significant and unavoidable impacts with respect to on- and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Furthermore, Alternative 1 would avoid the Project's significant and unavoidable cumulative impacts with respect to on- and off-site noise during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). In addition, Alternative 1 would avoid the Project's impacts that were determined to be less than significant with mitigation, including paleontological resources and on- and off-site vibration during construction (pursuant to the significance threshold for building damage). Impacts associated with the remaining environmental issues also would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing buildings and surface parking would remain on the Project Site, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project, which is to promote the revitalization of the Wilshire community and the surrounding area by transforming the underutilized infill Project Site while preserving existing contributors to the Miracle Mile Historic District, and integrating high-density multi-family housing uses and ground floor commercial space in close proximity to a future rail station. As Alternative 1 would not involve any new development, it would not meet any of the Project Objectives, as listed below:

- Provide housing to further the goals of the City's Housing Element and help the City meet its Regional Housing Needs Assessment obligations.
- Provide housing with a range of unit types, affordability levels, and sizes adjacent to public transit, to serve the surrounding area and citywide market.
- Ensure that the Wilshire community's historically significant resources are protected, preserved, and enhanced.
- Promote development that preserves and enhances the physical appearance of the corridor and contributes to the Miracle Mile's unique historical context.
- Reduce vehicle miles traveled (VMT), consistent with the objectives of SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy, by locating high-density residential uses near a future regional-serving transit hub (i.e., the Metro D Line Wilshire/La Brea Station) and an abundance of new and existing commercial uses that will provide services to residents and employment opportunities.
- Promote resource and energy conservation by incorporating sustainable building design and construction standards above Title 24 (CALGreen) code requirements.
- Provide fiscal benefits, economic development, and job creation by generating tax revenues for the City and creating jobs during project operation and construction.

V. Alternatives

B. Alternative 2: Reduced Density Alternative

1. Description of the Alternative

Alternative 2, the Reduced Density Alternative, would include the same uses proposed under the Project while reducing the amount of total new floor area proposed by the Project by approximately 25 percent. Specifically, as with the Project, Alternative 2 would utilize the City's Transit Oriented Communities (TOC) Guidelines to construct a podium tower (Residential Tower) comprised of residential units, a restaurant, and open space. However, this alternative would reduce the number of residential units proposed by the Project from 419 units to 314 units, including 35 Extremely Low-Income affordable units. Alternative 2 would also include a reduced, 1,983-square-foot restaurant (compared to the Project's 2,645-square-foot restaurant). Additionally, the amount of open space would be reduced from 47,534 square feet to 35,650 square feet. As with the Project, the existing commercial buildings, including Los Angeles HCM No. 451, which is limited to the façade of the Dark Room storefront along Wilshire Boulevard, would be retained and would provide 31,569 square feet of office and restaurant uses. In total, Alternative 2 would include 33,552 square feet of commercial floor area (reduced from 44,737 square feet as proposed by the Project) inclusive of the existing floor area to remain and would be comprised of 27,552 square feet of restaurant uses and 6,000 square feet of office uses. Additionally, as with the Project, 6,137 square feet of existing building area that were rear additions to the southwestern portion of the commercial building along Wilshire Boulevard would be removed.

With the reduction in floor area, Alternative 2 would also reduce the amount of parking to be provided. Specifically, Alternative 2 would provide up to 332 vehicle parking spaces within three below-grade and four above-grade parking levels. Comparatively, the Project would include 443 vehicle parking spaces within four below-grade and five above-grade parking levels. Accordingly, the amount of export would be reduced from 115,796 cubic yards to 86,847 cubic yards. Vehicular and pedestrian access would be similar to the Project. Alternative 2 would provide 35,650 square feet of open space with similar amenities to the Project, compared to 47,534 square feet of open space under the Project. Upon completion, Alternative 2 would result in a total floor area of 315,150 square feet (a reduction of 105,051 square feet compared to the Project), with an approximate overall FAR of 5.64:1, and a maximum building height of 34 stories at approximately 397 feet (compared to the Project's 43 stories at approximately 530 feet).

2. Environmental Impacts

a. Air Quality

(1) Consistency with Air Quality Plans

Alternative 2 would develop the same uses proposed under the Project while reducing the amount of total new floor area proposed by the Project by approximately 25 percent. Therefore, similar to the Project, Alternative 2 would concentrate new residential and commercial uses within a Transit Priority Area (TPA) and High Quality Transit Corridor (HQTC), thus reducing VMT. As with the Project, Alternative 2 would not increase the frequency or severity of an existing air quality violation or cause or contribute to new air quality violations, exceed any of the state and federal standards, or delay timely attainment of air quality standards or interim emission reductions specified in the AQMP. Thus, Alternative 2 would be consistent with the goals and policies of the AQMP. In addition, similar to the Project, Alternative 2 would support the City of Los Angeles and SCAQMD's objectives of reducing VMT and the related vehicular air emissions. As such, similar to the Project, Alternative 2 would not conflict with or obstruct implementation of the AQMP and would serve to advance applicable policies of the City pertaining to air quality. Impacts under Alternative 2 would be less than significant and similar to the impacts of the Project.

(2) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 2 has the potential to create air quality impacts associated with the use of heavy-duty construction equipment and from vehicle trips generated by haul trucks and construction workers traveling to and from the Project Site. In addition, fugitive dust emissions could result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, mobile source emissions could result from the use of construction equipment, such as dozers, loaders, and cranes. As with the Project, during the finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release volatile organic compounds (VOCs).

Under Alternative 2, construction activities would be reduced in comparison to the Project due to the reduction in development (i.e., 315,150 square feet for Alternative 2 compared to 420,201 square feet for the Project). This alternative would also reduce the number of subterranean parking levels from four to three levels, thus requiring less excavation. However, the intensity of air pollutant emissions and fugitive dust from excavation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional impacts on these days would be similar to those of the Project. Therefore, the construction-related regional emissions under Alternative 2 would be less than significant

and similar when compared to the less-than-significant impacts of the Project. However, the overall duration of construction activities and associated daily construction emissions would be reduced under Alternative 2 compared to the Project.

(b) Operation

Operational regional air pollutant emissions are generated by vehicle trips and VMT, which are the largest contributors to operational air pollutant emissions and, to a lesser extent, by the consumption of natural gas.

As discussed above, Alternative 2 would develop the same uses proposed under the Project while reducing the amount of total new floor area proposed by the Project by approximately 25 percent. As such, the number of daily trips and daily VMT generated by Alternative 2 would be less than the number of daily trips generated by the Project. Specifically, Alternative 2 would generate a total of 3,489 daily vehicle trips and 21,598 daily VMT, which would be less than the Project's 3,936 daily vehicle trips and 24,274 daily VMT.² As vehicle trips and VMT, which are the largest contributors to operational air pollutant emissions, and the consumption of natural gas would be reduced under Alternative 2 due to the reduction in development, the operational regional emissions of Alternative 2 would be less than those of the Project. Therefore, the operational regional air pollutant emissions of Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(3) Localized Emissions

(a) Construction

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. Although Alternative 2 would result in a reduction in development and excavation compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to the less-than-significant impacts of the Project. Therefore, as with the Project, localized impacts under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As identified above, Alternative 2 would generate a total of 3,489 daily vehicle trips and

² See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternative 2.

21,598 daily VMT, which would be less than the Project's 3,936 daily vehicle trips and 24,274 daily VMT.³ As such, total vehicular emissions under Alternative 2 would be less when compared to the Project. In addition, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. On-site sources would generate less operational emissions compared to the Project as the development proposed under Alternative 2 would be reduced compared to the Project. Accordingly, localized air quality impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(4) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy-duty equipment operations. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction TAC emissions given the short-term construction schedule. Overall construction TAC emissions generated by Alternative 2 would be less than those of the Project due to the reduction in construction activities. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include diesel particulate matter (DPM) from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent facility operations (e.g., emergency generators). Under Alternative 2, the overall increase in the number of deliveries and associated DPM emissions would be less than the Project due to the reduction in development. Similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Accordingly, as with the Project, operation of Alternative 2 would not release substantial amounts of TACs that would exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. Therefore, impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

³ See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternative 2.

b. Cultural Resources

(1) Historical Resources

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are historical resources on the Project Site. These include contributing buildings to the Miracle Mile Historic District and The Darkroom HCM.

As with the Project, Alternative 2 would retain the four existing on-site buildings along Wilshire Boulevard which are all contributors to the Miracle Mile Historic District. Alternative 2 would also retain the Darkroom HCM. Like the Project, Alternative 2 would not result in the substantial adverse change in the significance of historical resources on the Project Site or the greater Area of Potential Impact (API). No historical resources would be demolished, destroyed, or relocated as a result of Alternative 2 (the rear additions of the existing on-site buildings would be removed, but these additions are not character-defining features of these buildings). With respect to potential future tenant improvements (e.g., replacement of doors or window panes), as with the Project, any future improvements would be reviewed and approved by OHR in accordance with LAMC 91.106.4.5 such that the historic integrity of the buildings would not be materially impaired. To assist in these regulatory compliance efforts, like the Project, Alternative 2 would include Project Design Feature CUL-PDF-1 which requires preparation of an HSR which will thoroughly identify historic materials and character-defining features, provide documentary, graphic, and physical information about their existing conditions, and make recommendations for their treatment which will be adhered to. Further, like the Project, Alternative 2 would be required to implement mitigation during construction activities to monitor construction vibration levels and reduce impacts of vibratory equipment during construction as well as repair any vibration damage as applicable. Hence, the historic integrity of the existing on-site buildings would not be materially impaired by Alternative 2, similar to the Project. Lastly, like the Project, the introduction of a new visual feature in the form of the proposed Residential Tower would not diminish the historic integrity of the Miracle Mile Historic District or the other historical resources (i.e., the siren and three potential historic districts) in the API.

Overall, Alternative 2 would result in less-than-significant impacts with respect to historical resources, and such impacts would be similar when compared to the less-than-significant impacts of the Project.

(2) Archaeological Resources

As detailed in Section IV.B, Cultural Resources, of this Draft EIR, the results of the archaeological records search indicate that no archaeological resources have been previously recorded within the Project Site. The closest documented prehistoric resource to

the Project Site (P-19-000159/CA-LAN-159 [La Brea Women, etc.]) was identified approximately 0.7 miles west of the Project Site within the La Brea Tar Pits grounds.

Alternative 2 would include excavation activities in the same areas of the Project Site as the Project; however, as this alternative would construct fewer subterranean parking levels than the Project, the depth of excavation and total soil export under this alternative would be less than under the Project. Specifically, the depth of excavation would be reduced from 80 feet below ground surface to 60 feet below ground surface and the associated soil export would be reduced from 115,796 cubic yards to 86,847 cubic yards. Therefore, the potential for Alternative 2 to uncover previously unidentified archaeological resources during construction would be less than for the Project. Nevertheless, similar to the Project, Alternative 2 would implement the City's standard archaeological resources Condition of Approval (COA) to address the inadvertent discovery of archaeological resources. Therefore, Alternative 2 would result in less-than-significant impacts with respect to archaeological resources, and such impacts would be less when compared to the less-than-significant impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities under Alternative 2 would consume electricity associated with the conveyance of water for dust control and, on a limited basis, to power lighting, electric equipment, and other construction activities necessitating electrical power. As with the Project, the electricity demand during construction of Alternative 2 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off to avoid unnecessary energy consumption. Similar to the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, 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 worker 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). Construction equipment/vehicles used during construction of Alternative 2 would also comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Overall, as with the Project, Alternative 2 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in excavation

and overall amount of construction activities. Therefore, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 2 operations would generate an increased demand for electricity and natural gas. However, since the development under Alternative 2 would be reduced when compared to the Project, buildout of Alternative 2 would result in a lower projected net increase in the on-site demand for electricity and natural gas than the Project. Additionally, similar to the Project, Alternative 2 would comply with applicable energy conservation requirements during operation, including California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Los Angeles Green Building Code, and would implement Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment, which together would minimize electricity and natural gas consumption. Furthermore, as provided in the VMT Calculator results for the alternatives in Appendix L of this Draft EIR, Alternative 2 would generate a total of 3,489 daily vehicle trips and 21,598 daily VMT compared to the Project's 3,936 daily vehicle trips and 24,274 daily VMT and, thus, would consume less operation-related petroleum-based fuels than the Project.⁴ Therefore, as with the Project, operation of Alternative 2 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 2 would result in less-than-significant impacts related to energy use during operation, and such impacts would be less when compared to the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City's Building Code, Alternative 2, as with the Project, would not conflict with applicable plans for renewable energy or energy efficiency because both Alternative 2 and the Project would comply with the most current version of these codes in effect at the time building permits are issued. Alternative 2 would also implement Project Design Feature GHG-PDF-1 which prohibit the use of natural gas during Project operations, excluding restaurant cooking equipment. With regard to transportation-related energy usage, Alternative 2 would also comply with the goals of SCAG's RTP/SCS, which incorporate VMT targets established by SB 375. As with the Project, Alternative 2 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road

⁴ See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternative 2.

Diesel Fleet regulations during construction. Therefore, as with the Project, Alternative 2 would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 2 would be less-than-significant and similar to the less-than-significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, according to the records search conducted through the Natural History Museum of Los Angeles (NHMLA), there are no previously encountered fossil vertebrate localities located within the Project Site. However, the records search documented significant fossil finds nearby from the same sedimentary deposits that occur within the Project Site, either at the surface or at depth. The closest identified locality (LACM VP 1724) was discovered less than 0.5 miles west of the Project Site, near the Hauser Boulevard and Wilshire Boulevard intersection, at a depth of eight feet below grade surface.

Alternative 2 would include excavation activities in the same areas of the Project Site as the Project; however, as this alternative would construct fewer subterranean parking levels than the Project, the depth of excavation and total soil export under this alternative would be less than under the Project. Specifically, the depth of excavation would be reduced from 80 feet below ground surface to 60 feet below ground surface and the associated soil export would be reduced from 115,796 cubic yards to 86,847 cubic yards. Therefore, the potential for Alternative 2 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Nevertheless, Alternative 2 would comply with the same regulatory requirements and would implement the same mitigation measures as the Project in the event paleontological resources are uncovered during site grading activities (i.e., Mitigation Measures GEO-MM-1 through GEO-MM-3). Therefore, as with the Project, impacts to paleontological resources under Alternative 2 would be less than significant with mitigation. However, such impacts would be less when compared to the less-than-significant with mitigation impacts of the Project.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by the energy consumption from proposed land uses. As previously discussed above, the number of daily trips and daily VMT under Alternative 2 would be reduced compared to the Project due to the reduction in development. Specifically, Alternative 2 would generate a total of 3,489 daily vehicle trips and 21,598 daily VMT, which would be less than the Project's

3,936 daily vehicle trips and 24,274 daily VMT.⁵ In addition, energy and water consumption from the proposed land uses would be reduced compared to the Project due to the reduction in development (i.e., 315,150 square feet for Alternative 2 compared to 420,201 square feet for the Project). Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. As with the Project, Alternative 2 would also include Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment. Consistent with the Project, Alternative 2 would be designed to comply with the requirements of the current version of CALGreen and the Los Angeles Green Building Code in effect at the time of building permit issuance and include a new mixed-use development in proximity to existing jobs and a variety of commercial uses and services with convenient access to public transit. Specifically, the Project Site is located adjacent to the future Metro D Line Wilshire/La Brea Station, as well as several bus lines within 0.25 miles, including Metro Bus Lines 20 and 720, LADOT DASH Fairfax Line, and Antelope Valley Transit Authority Bus Line 786. Alternative 2 would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC, which would reduce VMT and associated fuel usage and GHG emissions. In compliance with applicable regulations and implementation of comparable sustainability features as the Project, Alternative 2 would be consistent with the GHG reduction plans and policies, such as the 2022 Scoping Plan, the RTP/SCS, and the City's Green New Deal. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

f. Land Use and Planning

Alternative 2 would include the same uses proposed under the Project while reducing the amount of new floor area proposed under the Project by approximately 25 percent. Alternative 2 would require the same discretionary approvals as the Project; therefore, Alternative 2 would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including SCAG's RTP/SCS; the General Plan, including the Framework Element, Transportation Element (Mobility Plan), Housing Element, Conservation Element, and Health and Wellness Element (Plan for a Healthy Los Angeles); Wilshire Community Plan; LAMC (Zoning Code); the TOC Guidelines; Citywide Design Guidelines; and the Miracle Mile Community Design Overlay (CDO). Therefore, impacts related to conflicts with land use plans would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

⁵ See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternative 2.

g. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be similar to the Project, although the amount of construction activities and duration would be reduced due to a smaller development proposed under Alternative 2. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. Although the amount of construction activities would be reduced under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to those of the Project during maximum activity days (i.e., similar types and number of construction equipment). As with the Project, Alternative 2 would implement similar project design features such as enclosing outdoor mounted mechanical equipment and locating loading docks inside an enclosed space to minimize construction noise. In addition, Alternative 2 would implement similar mitigation measures as the Project, including installation of a temporary and impermeable sound barrier, which would reduce noise levels at the ground level of nearby sensitive receptors. However, the temporary sound barrier would not be effective in reducing the construction noise at upper levels of nearby sensitive receptors. Since there are no other feasible mitigation measures to further reduce construction-related noise at the upper levels of nearby sensitive receptors, on-site construction noise would also be significant and unavoidable under Alternative 2.

With regard to off-site noise sources, Alternative 2 would similarly require a mat foundation pour and off-site water infrastructure improvements and would generate truck trips associated with construction. Given the use of the same haul route as the Project and similar construction activities, off-site construction noise impacts associated with haul trucks under Alternative 2 would similarly be less than significant while off-site construction noise impacts during construction of the water infrastructure improvements would be significant and unavoidable as with the Project.

As with the Project, the cumulative noise impacts due to on- and off-site construction activities would be significant and unavoidable as construction noise levels during maximum activity days under Alternative 2 would be similar to the Project. However, given the overall reduction in construction activities, impacts would occur over a shorter construction period.

(b) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including outdoor mechanical equipment (e.g., heating, ventilation, and air conditioning [HVAC] equipment),

activities associated with the proposed outdoor spaces, parking facilities, and loading dock and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 2 would introduce noise from on-site noise sources similar to the Project. However, it is anticipated that with the overall reduction in uses under this alternative, the noise levels from building mechanical equipment and outdoor spaces would be reduced. As with the Project, Alternative 2 would also comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. In addition, similar to the Project, Alternative 2 would implement project design features such as acoustic screening of outdoor mechanical equipment and controls on outdoor amplified sound systems, which would minimize on-site operational noise. Thus, operational on-site noise impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 2 would generate less operational traffic than the Project due to the reduction in the number of residential units and total development. Specifically, Alternative 2 would generate a total of 3,489 daily vehicle trips and 21,598 daily VMT, which would be less than the Project's 3,936 daily vehicle trips and 24,274 daily VMT.⁶ The reduction in vehicle trips would result in a decrease in off-site operational traffic-related noise levels under Alternative 2. Therefore, as with the Project, off-site noise impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be reduced. As with the Project, construction of Alternative 2 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. On- and off-site vibration levels would be expected to be similar to those of the Project during peak construction activities. Accordingly, as with the Project, construction activities under Alternative 2 would result in less-than-significant with mitigation on- and off-site vibration impacts (building damage) and significant and unavoidable on- and off-site vibration impacts with respect to human annoyance. While the construction-related vibration impacts of Alternative 2 would be similar to the Project, given the overall reduction in construction activities, such impacts would occur over a shorter construction period.

⁶ See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternative 2.

(b) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 2. As with the Project, vehicular-induced vibration from Alternative 2, including vehicle circulation, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 2 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 2 would also be less than significant. However, such impacts would be less than those of the Project due to the reduction in vehicle trips and floor area under this alternative.

h. Public Services

(1) Fire Protection

(a) Construction

The overall amount of construction under Alternative 2 would be reduced as compared to the Project due to the decrease in total floor area and reduced excavation. As with the Project, as discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, construction under Alternative 2 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous material, which would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Additionally, similar to the Project, Alternative 2 would maintain travel lanes in each direction on all streets around the Project Site throughout the construction period and would implement a Construction Traffic Management Plan (CTMP) to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Also, as with the Project, Alternative 2 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to California

Vehicle Code (CVC) Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Therefore, based on the above, construction of Alternative 2, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, Alternative 2 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for LAFD fire protection services. However, due to the reduction in total new floor area and uses, Alternative 2 would generate a smaller service population compared to the Project. As such, the overall increased demand for LAFD fire protection services would be reduced compared to that of the Project.

Similar to the Project, Alternative 2 would implement all applicable Los Angeles Building Code and Fire Code requirements, including, but not limited to, structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review and LAFD's fire/life safety inspection to ensure compliance with the above, which would reduce the demand for fire protection services and also ensure adequate emergency access. Furthermore, as with the Project, traffic generated by Alternative 2 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal circulation under Alternative 2 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

Given the reduction in total floor area, the fire and domestic water need for Alternative 2 would be less than the Project. However, as with the Project, Alternative 2 could potentially require replacing a portion of the existing 6-inch water main on Detroit Street, as well as installation of three new fire hydrants that will connect to the existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard, as determined by the LAFD and Los Angeles Department of Water and Power (LADWP), to ensure that adequate fire flow is available. As discussed in Section IV.K.1 Utilities and Service Systems—Water Supply and Infrastructure, impacts associated with this potential infrastructure improvement would be less than significant. Therefore, similar to the Project, Alternative 2 would not

necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts would be less than significant and less than the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Similar to the Project, construction of Alternative 2 would not generate a permanent population on the Project Site that would substantially increase the police service population of the Wilshire Community Police Station because the daytime population generated during construction would be temporary in nature. As with the Project, Alternative 2 would implement similar project design features as the Project, which would include security fencing, lighting, and locked entry to secure construction areas of the Project Site during construction, thereby reducing demand for police protection services.

Furthermore, as previously discussed, Alternative 2 would implement a CTMP to ensure that adequate and safe access is available within and near the Project Site during construction activities. Lastly, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 2 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Construction-related impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As indicated in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As with the Project, Alternative 2 would introduce a new residential and visitor population to the Project Site and would increase LAPD's residential service population in the Wilshire Area; however, due to the reduction in total new floor area, Alternative 2 would generate a smaller residential service population compared to the Project. Similar to the Project, Alternative 2 would implement project design features as the Project during operation, which would help reduce the demand for police services. Furthermore, as with the Project, Alternative 2 would generate revenues to the City's General Fund that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Therefore, Alternative 2, as with the Project, would not result in the

need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

i. Transportation

As previously described, Alternative 2 would be developed within the same Project Site as the Project and would include similar uses as the Project. However, Alternative 2 results in a 25 percent reduction in overall development. As such, the same transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 2. These include the Mobility Plan, Wilshire Community Plan, Miracle Mile CDO, Plan for a Healthy Los Angeles, LAMC, Vision Zero, and the Citywide Design Guidelines. As with the Project, Alternative 2 would not conflict with these plans, policies and regulations. In particular, Alternative 2 would represent a mixed-use development with multi-family residential uses and commercial uses and would be served by a variety of public transit options, including the future Metro D Line Wilshire/La Brea Station (located immediately east of the Project Site). As with the Project, this alternative would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Wilshire Community Plan; prioritize safety and access for all individuals utilizing the Project Site by complying with all American with Disabilities Act (ADA) requirements as required by the LAMC; include public realm improvements (i.e., new street trees and landscaping); bicycle parking in accordance with LAMC requirements; and encourage walking, biking, and transit use as called for by the Wilshire Community Plan and Plan for a Healthy Los Angeles. Alternative 2 would also reduce VMT per capita for residents, including through the implementation of transportation demand management (TDM) strategies (e.g., the provision of short- and long-term bicycle parking that would serve to promote use of bicycles) as called for by the Mobility Plan, SCAG's RTP/SCS, and the City's TDM Ordinance. Furthermore, while Wilshire Boulevard has been identified as part of the Vision Zero's High Injury Network, no specific Vision Zero projects are planned near the Project Site, and, as with the Project, Alternative 2 would not preclude future improvements by the City. Therefore, as with the Project, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar between the Alternative 2 and the Project as neither would conflict with an applicable transportation plan.

As provided in the VMT Calculator Output included in Appendix L of this Draft EIR, Alternative 2 would generate an average daily household VMT of 4.6 per capita and an average daily work VMT of 6.8 per capita, which would be below the average daily household VMT per capita significance threshold of 6.0 for the Central APC and below the average daily

work VMT per capita significance threshold of 7.6 for the Central APC.⁷ Therefore, as with the Project, Alternative 2 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding VMT. As such, the VMT impacts of Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

Regarding freeway off-ramp safety, as required by Los Angeles Department of Transportation (LADOT's) Interim Guidance for Freeway Safety Analysis, if a project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. The Project would add fewer than 25 trips to all the freeway off-ramps in both the morning and afternoon peak hours such that further analysis was not required, and thus, the Project was determined to result in less-than-significant freeway off-ramp safety impacts.⁸ Since Alternative 2 would generate less daily traffic when compared to the Project, Alternative 2 would also result in less-than-significant freeway off-ramp safety impacts, and such impacts would be less when compared to the less-than-significant impacts of the Project.

j. Tribal Cultural Resources

As indicated in Section IV.J, Tribal Cultural Resources, of this Draft EIR, the South Central Coastal Information Center (SCCIC) and Sacred Lands File (SLF) records search results were negative for tribal cultural resources or potential tribal cultural resources within the Project Site or a 0.5-mile radius. In addition, the consultations with the applicable California Native American Tribes conducted in accordance with Assembly Bill (AB) 52 did not identify any tribal cultural resources on the Project Site.

As previously discussed, Alternative 2 would include excavation activities in the same areas of the Project Site as the Project; however, as this alternative would construct fewer subterranean parking levels than the Project, the depth of excavation and total soil export under this alternative would be less than under the Project. Specifically, the depth of excavation would be reduced from 80 feet below ground surface to 60 feet below ground surface and the associated soil export would be reduced from 115,796 cubic yards to 86,847 cubic yards. Notwithstanding, as the typical average depth for buried tribal cultural resources in the Los Angeles Basin is approximately 12 feet below the surface, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be similar compared to that of the Project. In addition, like the Project, Alternative 2 would implement the City's standard COA for the inadvertent discovery of tribal cultural resources. Therefore, Alternative 2 would result in less-than-significant impacts with respect to tribal cultural

⁷ See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternative 2.

⁸ Fehrs & Peers, Wilshire and Cloverdale Project Transportation Assessment, November 2024.

resources, and such impacts would be similar to the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 2 would result in a temporary demand for dust control, cleaning of equipment, excavation, and grading/recompaction activities. Construction-related water use under Alternative 2 would be less since the amount of new construction and the construction duration required under Alternative 2 would be reduced. Furthermore, while Alternative 2 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 2 would implement a CTMP to ensure the safe and efficient flow of vehicular and pedestrian traffic, and that emergency access to the Project Site and adjacent properties would be maintained during the construction period. As such, as with the Project, Alternative 2 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Alternative 2 would result in less-than-significant impacts related to water supply and infrastructure, which would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development, the water demand for Alternative 2 would be less than the Project's estimated increase in water demand. Thus, the estimated water demand under Alternative 2 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2045. As with the Project, Alternative 2 could potentially require replacing a portion of the existing 6-inch water main on Detroit Street, as well as installation of three new hydrants that will connect to the existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard, as determined by the LAFD and LADWP, to ensure that adequate fire flow is available. As discussed above, the construction activities associated with these improvements would not cause significant environmental effects. Therefore, impacts to water supply under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, temporary facilities (e.g., portable toilet, hand wash stations, etc.) would be provided by the construction contractor; however, any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Therefore, like the Project, wastewater generation from construction activities under Alternative 2 would not cause a measurable increase in wastewater flows.

As with the Project, Alternative 2 would require the installation of new on-site sewer line connections to connect the proposed uses to the existing off-site public sewer mains along the streets surrounding the Project Site. Construction impacts associated with the installation of new sewer line connections would primarily be confined to trenching in order to place the new sewer line connections below surface for connection into the existing off-site sewer public infrastructure. As with the Project, any off-site work that may affect services to the existing sewer lines in the vicinity of the Project Site would be coordinated with the City's Bureau of Engineering (BOE). In addition, similar to the Project, Alternative 2 would implement a CTMP to reduce any temporary pedestrian and traffic impacts that might result from trenching and installation of new sewer line connections. The CTMP would also ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. As such, as with the Project, Alternative 2 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts.

Therefore, based on the above, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in development, wastewater generation under Alternative 2 would be less than the Project's estimated wastewater flow. Since the Project's wastewater flows would be accommodated by the existing infrastructure, the wastewater generated by Alternative 2 would also be accommodated by the existing capacity of the Hyperion Water Reclamation Plant (HWRP), and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site.

Given that wastewater flows generated by Alternative 2 would be less than the estimated wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 2. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, operational impacts with regard to wastewater generation and infrastructure capacity under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

The energy consumed by Alternative 2 would be reduced compared to the Project due to the reduction in the overall amount of construction activities. Therefore, as with the Project, impacts on infrastructure capacity associated with short-term construction activities under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, Alternative 2 operation would result in less electricity and natural gas consumption than the Project due to the reduction in development under this alternative. Therefore, since the existing electricity and natural gas infrastructure would be adequate to serve Project operation, existing energy infrastructure would be adequate to serve Alternative 2 operation. Furthermore, as with the Project, Alternative 2 would be developed in accordance with applicable energy conservation requirements, including those in current version of Title 24, CALGreen Code and the Los Angeles Green Building Code in effect at the time of building permit issuance, and would implement Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment, all of which would minimize electricity and natural gas consumption. Therefore, as with the Project, Alternative 2 operation would not result in an increase in energy demand that would exceed available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Thus, operational impacts related to energy under Alternative 2 would be less-than-significant and less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 2 would not avoid the Project's significant and unavoidable impacts with respect to on- and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Additionally, Alternative 2 would not avoid the Project's significant and unavoidable cumulative impacts regarding on- and off-site noise during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). These impacts would continue to be significant and unavoidable under Alternative 2, although the duration of such impacts would be reduced due to the overall reduction in development and associated construction activities.

Alternative 2 would result in similar impacts associated with the following environmental topics where the Project's impacts were concluded to be less than significant with mitigation: on- and off-site vibration during construction (pursuant to the significance threshold for building damage).

Alternative 2 would result in less than significant with mitigation impacts associated with paleontological resources that would be less than the less-than-significant with mitigation impacts of the Project due to the reduction in the depth of excavation.

Additionally, Alternative 2 would result in similar less-than-significant impacts as the Project with regard to the following topics: historical resources, land use and planning, conflicts with transportation plans, tribal cultural resources, and wastewater (construction).

Furthermore, Alternative 2 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: operational regional and local air pollutant emissions, TACs, archaeological resources, energy use during construction and operation, GHG emissions, public services (fire protection and police protection), VMT, freeway off ramp safety, and utilities and service systems (water supply and infrastructure, wastewater [operation], and energy infrastructure).

4. Relationship of the Alternative to Project Objectives

Alternative 2 would include the same uses proposed under the Project while reducing the amount of total new floor area proposed under the Project by approximately 25 percent. While the amount of development under this alternative would be less than under the Project, Alternative 2 would generally meet the underlying purpose of the Project, which is to promote the revitalization of the Wilshire community and the surrounding area by transforming the underutilized infill Project Site while preserving existing contributors to the Miracle Mile

Historic District, and integrating high-density multi-family housing uses and ground floor commercial space in close proximity to a future rail station. However, Alternative 2 would be less effective than the Project in meeting this purpose as a result of the reduced amount of development under this alternative.

Regarding the Project objectives, Alternative 2 would meet the following Project objectives to the same extent as the Project:

- Ensure that the Wilshire Community's historically significant resources are protected, preserved, and enhanced.
- Promote development that preserves and enhances the physical appearance of the corridor and contributes to the Miracle Mile's unique historical context.
- Promote resource and energy conservation by incorporating sustainable building design and construction standards above Title 24 (CALGreen) code requirements.

Alternative 2 would also meet the following Project objectives but not to the same extent as the Project due primarily to the reduced number of residential units:

- Provide housing to further the goals of the City's Housing Element and help the City meet its Regional Housing Needs Assessment obligations.
- Provide housing with a range of unit types, affordability levels, and sizes adjacent to public transit, to serve the surrounding area and citywide market.
- Reduce vehicle miles traveled (VMT), consistent with the objectives of SCAG's 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy, by locating high-density residential uses near a future regional-serving transit hub (i.e., the Metro D Line Wilshire/La Brea Station) and an abundance of new and existing commercial uses that will provide services to residents and employment opportunities.
- Provide fiscal benefits, economic development, and job creation by generating tax revenues for the City and creating jobs during project operation and construction.

V. Alternatives

C. Alternative 3: Reduced Excavation Alternative

1. Description of the Alternative

Alternative 3, the Reduced Excavation Alternative, would include the same uses proposed by the Project but would eliminate all subterranean parking. Specifically, parking for the proposed uses under this alternative would be provided within nine above-grade parking levels. Both the Project and Alternative 3 would construct a podium tower (Residential Tower) comprised of up to 419 residential units, including 47 Extremely Low-Income affordable units, a 2,645 square-foot restaurant, and 47,534 square feet of open space. Existing commercial buildings, including Los Angeles HCM No. 451, which is limited to the façade of the Dark Room storefront along Wilshire Boulevard, would be retained and would provide 42,092 square feet of office and restaurant uses. In total, like the Project, Alternative 3 would include 44,737 square feet of commercial floor area inclusive of 36,737 square feet of restaurant uses and 8,000 square feet of office uses. Additionally, 6,137 square feet of existing building area that were rear additions to the southwestern portion of the commercial building along Wilshire Boulevard would similarly be removed as part of this alternative. Under Alternative 3, the proposed uses would be located within a single 50-story tower with an approximate height of 570 compared to the maximum height of 43 stories and 530 feet proposed by the Project. With the elimination of subterranean parking, the amount of export would be reduced from 115,796 cubic yards to 57,898 cubic yards (a reduction of 57,898 cubic yards). The remaining project components, and approximate FAR, would be the same as the Project.

2. Environmental Impacts

a. Air Quality

(1) Consistency with Air Quality Plans

Alternative 3 would include the same development program as the Project (the only difference being the development of above- rather than below-grade parking levels). Thus, similar to the Project, Alternative 3 would concentrate new residential and commercial uses within a TPA and HQTIC, thus reducing VMT. As with the Project, Alternative 3 would not increase the frequency or severity of an existing air quality violation or cause or contribute to new violations, exceed any of the state and federal standards, or delay timely attainment of

air quality standards or interim emission reductions specified in the AQMP. Thus, Alternative 3 would be consistent with the goals and policies of the AQMP. In addition, similar to the Project, Alternative 3 would support the City of Los Angeles and SCAQMD's objectives of reducing VMT and the related vehicular air emissions. Thus, similar to the Project, Alternative 3 would not conflict with or obstruct implementation of the AQMP and would serve to advance applicable policies of the City pertaining to air quality. Impacts under Alternative 3 would be less than significant and similar to the impacts of the Project.

(2) Regional Emissions

(a) Construction

As with the Project, construction of Alternative 3 has the potential to create air quality impacts associated with the use of heavy-duty construction equipment and from vehicle trips generated by haul trucks and construction workers traveling to and from the Project Site. In addition, fugitive dust emissions could result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, mobile source emissions could result from the use of construction equipment, such as dozers, loaders, and cranes. As with the Project, during the finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs.

As described above, while Alternative 3 would involve the construction of the same amount of floor area as the Project, the amount of excavation and export would be reduced by 50 percent in comparison to the Project. Accordingly, peak day construction emissions associated with the reduction in excavation and export would be expected to be reduced under Alternative 3. The overall duration of construction activities and associated daily construction emissions would also be reduced. Because maximum daily conditions are used for measuring impact significance, regional impacts would be reduced compared to the Project. Therefore, the construction-related regional emissions under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

Similar to the Project, operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. As discussed above, Alternative 3 would include the same development program as the Project. As such, the number of daily vehicle trips and related VMT as well as the consumption of electricity and natural gas generated by Alternative 3 would be the same as the Project. Therefore, the operational regional air pollutant emissions of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Localized Emissions

(a) Construction

On-site construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. In addition, while Alternative 3 would involve the construction of the same amount of floor area as the Project, the amount of excavation and export would be reduced by 50 percent in comparison to the Project. Accordingly, peak day construction emissions associated with the reduction in excavation and export would be expected to be reduced under Alternative 3. The overall duration of construction activities and associated daily construction emissions would also be reduced. Because maximum daily conditions are used for measuring impact significance, localized impacts would be reduced compared to the Project. Therefore, as with the Project, construction-related localized impacts under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

Localized operational impacts are determined primarily by traffic volumes. As identified above, Alternative 3 would generate the same number of daily trips and VMT as the Project. As such, total vehicular emissions under Alternative 3 would be similar when compared to the Project. In addition, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. On-site sources under Alternative 3 would generate similar operational emissions compared to the Project. Accordingly, localized air quality impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(4) Toxic Air Contaminants

(a) Construction

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy-duty equipment operations. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to construction TAC emissions given the short-term construction schedule. As previously described, while Alternative 3 would involve the construction of the same amount of floor area as the Project, the amount of excavation and export would be reduced by 50 percent in comparison to the Project. Therefore, overall construction TAC emissions generated by Alternative 3 would be less than those of the Project due to the reduction in excavation activities. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As set forth in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential TAC emissions associated with Project operations would include DPM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent facility operations (e.g., emergency generators). Under Alternative 3, the overall increase in the number of deliveries and associated DPM emissions would be similar as the Project due to the same development program as the Project. Similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Accordingly, as with the Project, operation of Alternative 3 would not release substantial amounts of TACs that would exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0. Therefore, impacts under Alternative 3 would be less than significant and similar when compared to the less-than-significant impacts of the Project.

b. Cultural Resources**(1) Historical Resources**

As discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are historical resources on the Project Site. These include contributing buildings to the Miracle Mile Historic District and The Darkroom HCM.

As with the Project, Alternative 3 would retain the four existing on-site buildings along Wilshire Boulevard which are all contributors to the Miracle Mile Historic District. Alternative 3 would also retain the Darkroom HCM. Like the Project, Alternative 3 would not result in the substantial adverse change in the significance of historical resources on the Project Site or the greater API. No historical resources would be demolished, destroyed, or relocated as a result of Alternative 3 (the rear additions to one of these existing on-site buildings would be removed; however, these additions are not character-defining features of the buildings). With respect to potential future tenant improvements (e.g., replacement of doors or window panes), as with the Project, any future improvements would be reviewed and approved by OHR in accordance with LAMC 91.106.4.5 such that the historic integrity of the buildings would not be materially impaired. To assist in these regulatory compliance efforts, like the Project, Alternative 3 would include Project Design Feature CUL-PDF-1 which requires preparation of an HSR which will thoroughly identify historic materials and character-defining features, provide documentary, graphic, and physical information about their existing conditions, and make recommendations for their treatment which will be adhered to. Further, like the Project, Alternative 3 would be required to implement Mitigation Measures NOI-MM-2 and NOI-MM-3 during construction activities to monitor construction vibration levels as well as reduce impacts of vibratory equipment during construction and repair any vibration damage, as applicable. Hence, as with the Project, the historic integrity of the existing on-site buildings would not be materially impaired by Alternative 3. Lastly, although Alternative

3 would be taller than the Project, like the Project, the introduction of a new visual feature in the form of the proposed Residential Tower would not diminish the historic integrity of the Miracle Mile Historic District or the other historical resources (i.e., the siren and three potential historic districts) in the API because the broad setting has already been altered since the period of significance.

Overall, Alternative 3 would result in less-than-significant impacts with respect to historical resources, and such impacts would be similar when compared to the less-than-significant impacts of the Project.

(2) Archaeological Resources

As detailed in Section IV.B, Cultural Resources, of this Draft EIR, the results of the archaeological records search indicate that no archaeological resources have been previously recorded within the Project Site. The closest documented prehistoric resource to the Project Site (P-19-000159/CA-LAN-159 [La Brea Women, etc.]) was identified approximately 0.7 miles west of the Project Site within the La Brea Tar Pits grounds.

Alternative 3 would eliminate the four subterranean parking levels proposed by the Project. This would result in shallower maximum excavation depths under Alternative 3 (i.e., 40 feet below ground surface) than under the Project (i.e., 80 feet below ground surface). Therefore, the potential for Alternative 3 to uncover previously unidentified archaeological resources during construction would be less than for the Project. Nevertheless, like the Project, Alternative 3 would implement the City's standard archaeological resources COA to address the inadvertent discovery of archaeological resources. Therefore, Alternative 3 would result in less-than-significant impacts with respect to archaeological resources, and such impacts would be less when compared to the less-than-significant impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(a) Construction

Similar to the Project, construction activities under Alternative 3 would consume electricity associated with the conveyance of water for dust control and, on a limited basis, to power lighting, electric equipment, and other construction activities necessitating electrical power. As with the Project, the electricity demand during construction of Alternative 3 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment

would be powered off to avoid unnecessary energy consumption. Similar to the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, 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 worker 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). Construction equipment/vehicles used during construction of Alternative 3 would also comply with Title 24 standards and other applicable energy conservation requirements, CARB anti-idling and In-Use Off-Road Diesel-Fueled Fleet regulations, federal fuel efficiency standards, and other applicable requirements. Overall, as with the Project, Alternative 3 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. However, the overall energy demand during construction of Alternative 3 would be reduced compared to the Project due to the reduction in excavation activities. Therefore, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 3 and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 3 operations would generate an increased demand for electricity. Since Alternative 3 would include the same development program as the Project, buildout of Alternative 3 would result in a similar projected net increase in the on-site demand for electricity and natural gas as the Project. Additionally, similar to the Project, Alternative 3 would comply with applicable energy conservation requirements during operation, including California's Building Energy Efficiency Standards (Title 24 standards), CALGreen Code, and the Los Angeles Green Building Code, and would implement Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment, which together would minimize electricity and natural gas consumption. Furthermore, Alternative 3 would generate the same number of daily trips and related VMT as the Project and, thus, would consume the same operation-related petroleum-based fuels as the Project. Therefore, as with the Project, operation of Alternative 3 would not involve the wasteful, inefficient, or unnecessary consumption of energy resources. As such, Alternative 3 would result in less-than-significant impacts related to energy use during operation, and such impacts would be similar when compared to the less-than-significant impacts of the Project.

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

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City's Building Code, Alternative 3, as with

the Project, would not conflict with applicable plans for renewable energy or energy efficiency because both Alternative 2 and the Project would comply with the most current version of these codes in effect at the time building permits are issued. Alternative 3 would also implement Project Design Feature GHG-PDF-1 which prohibit the use of natural gas during Project operations, excluding restaurant cooking equipment. With regard to transportation-related energy usage, Alternative 3 would also comply with the goals of SCAG's RTP/SCS, which incorporate VMT targets established by SB 375. As with the Project, Alternative 3 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction. Therefore, as with the Project, Alternative 3 would not conflict with plans for renewable energy or energy efficiency. The impacts of Alternative 3 would be less-than-significant and similar to the less-than-significant impacts of the Project.

d. Geology and Soils (Paleontological Resources)

As discussed in Section IV.D, Geology and Soils, of this Draft EIR, according to the records search conducted through the NHMLA, there are no previously encountered fossil vertebrate localities located within the Project Site. However, the records search documented significant fossil finds nearby from the same sedimentary deposits that occur within the Project Site, either at the surface or at depth. The closest identified locality (LACM VP 1724) was discovered less than 0.5 miles west of the Project Site, near the Hauser Boulevard and Wilshire Boulevard intersection, at a depth of eight feet below grade surface.

As previously discussed, Alternative 3 would eliminate the four subterranean parking levels proposed by the Project. This would result in shallower maximum excavation depths under Alternative 3 (i.e., 40 feet below ground surface) than under the Project (i.e., 80 feet below ground surface). Therefore, the potential for Alternative 3 to uncover subsurface paleontological resources would be reduced when compared to that of the Project. Nevertheless, Alternative 3 would comply with the same regulatory requirements and would implement the same mitigation measures as the Project in the event paleontological resources are uncovered during site grading activities (i.e., Mitigation Measures GEO-MM-1 through GEO-MM-3). Overall, as with the Project, impacts to paleontological resources under Alternative 3 would be less than significant with mitigation. However, such impacts would be less when compared to the less-than-significant with mitigation impacts of the Project due to the reduced excavation proposed under this alternative.

e. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily vehicle trips generated and associated VMT, as well as by the energy consumption from proposed land uses. As previously discussed above, Alternative 3 would include the same development program as the Project. As such, the number of daily trips

and related VMT generated by Alternative 3 would be the same as the Project. In addition, energy and water consumption from the proposed land uses would be similar when compared to the Project due to the same development program. Thus, the amount of GHG emissions generated by Alternative 3 would be similar as the amount generated by the Project. As with the Project, Alternative 3 would also include Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment. Like the Project, Alternative 3 would be designed to comply with the requirements of the current version of CALGreen and the Los Angeles Green Building Code in effect at the time of building permit issuance and would include a new mixed-use development in proximity to existing jobs and a variety of commercial uses and services with convenient access to public transit. Specifically, the Project Site is located adjacent to the future Metro D Line Wilshire/La Brea Station, as well as several bus lines within 0.25 miles, including Metro Bus Lines 20 and 720, LADOT DASH Fairfax Line, and Antelope Valley Transit Authority Bus Line 786. Alternative 3 would also provide short- and long-term bicycle parking spaces in compliance with the requirements of the LAMC, which would reduce VMT and associated fuel usage and GHG emissions. With compliance with applicable regulations and implementation of comparable sustainability features as the Project, Alternative 3 would be consistent with the applicable GHG reduction plans and policies, such as the 2022 Scoping Plan, the RTP/SCS, and the Green New Deal. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

f. Land Use and Planning

As previously discussed, Alternative 3 would include the same uses proposed by the Project but would eliminate the number of subterranean parking levels. Alternative 3 would also require the same discretionary approvals as the Project; therefore, Alternative 3 would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site and that were adopted to avoid or mitigate an environmental effect, including SCAG's RTP/SCS; the General Plan, including the Framework Element, Transportation Element (Mobility Plan), Housing Element, Conservation Element, and Health and Wellness Element (Plan for a Healthy Los Angeles); Wilshire Community Plan; LAMC (Zoning Code); Citywide Design Guidelines; and the Miracle Mile CDO. Therefore, impacts related to conflicts with land use plans would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

g. Noise

(1) Noise

(a) Construction

As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips. As described above, while Alternative 3 would involve the construction of the same amount of floor area as the Project, the amount of excavation and export would be reduced by 50 percent in comparison to the Project. Accordingly, on- and off-site construction activities and the associated construction noise levels under Alternative 3 would be expected to be reduced compared to those of the Project during maximum activity days. Therefore, noise levels during maximum activity days would be less than those of the Project. In addition, as with the Project, Alternative 3 would implement similar project design features and mitigation, which would reduce construction noise levels. However, Alternative 3 would continue to result in significant and unavoidable on-site and off-site construction noise impacts, although such impacts would be reduced compared to the Project.

(b) Operation

As discussed in Section IV.G, Noise, of this Draft EIR, sources of operational noise under the Project would include (a) on-site stationary noise sources, including mechanical equipment, activities within the proposed outdoor spaces (i.e., outdoor dining and terraces), parking facilities and loading dock; and (b) off-site mobile (roadway traffic) noise sources. Regarding on-site operational noise, Alternative 3 would introduce noise from similar on-site noise sources as this alternative would include the same amount of development as the Project. Alternative 3 would also implement project design features similar to the Project, including regarding acoustic screening of loading areas from off-site noise receptors and controls on amplified sound, which would minimize on-site operational noise. As with the Project, Alternative 3 would also comply with the regulations under LAMC Section 112.02 which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. Thus, operational on-site noise impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

With regard to operational off-site (i.e., traffic) noise, Alternative 3 would generate the same level of operational traffic when compared to the Project. Therefore, as with the Project, off-site noise impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be reduced with the elimination of the subterranean parking. As with the Project, construction of Alternative 3 would generate on- and off-site vibration from the use of heavy-duty construction equipment and from truck trips. On- and off-site vibration levels would be expected to be less than those of the Project with the elimination of the subterranean parking and associated excavation and soil export activities. However, as with the Project, construction activities under Alternative 3 would result in less-than-significant with mitigation on- and off-site vibration impacts (building damage) and would result in significant and unavoidable on- and off-site vibration impacts with respect to human annoyance, although such impacts would be reduced compared to the Project.

(b) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation, would not generate perceptible vibration levels at off-site sensitive uses. In addition, as with the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 3 would not increase the existing vibration levels in the immediate vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 3 would also be less than significant and similar to the Project.

h. Public Services

(1) Fire Protection

(a) Construction

As previously described, the overall amount of construction activities and duration of construction would be reduced compared to the Project as Alternative 3 would eliminate the four subterranean parking levels proposed by the Project. As with the Project, construction under Alternative 3 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of

hazardous material, which would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Additionally, similar to the Project, Alternative 3 would maintain travel lanes in each direction on all streets around the Project Site throughout the construction period and would implement a CTMP to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Also, as with the Project, Alternative 3 would include temporary traffic controls such as flag persons to control traffic movement during temporary traffic flow disruptions. Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and traffic flow is maintained on adjacent rights-of-way. Furthermore, pursuant to CVC Section 21806, the drivers of emergency vehicles are able to avoid traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic.

Therefore, based on the above, construction of Alternative 3, as with the Project, would not result in the need for new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, the development program under Alternative 3 would be the same as under the Project (i.e., the same types and quantities of uses). As such, the increase in LAFD fire protection service demand under Alternative 3 would be similar to the Project. In addition, similar to the Project, Alternative 3 would implement all applicable Los Angeles Building Code and Fire Code requirements, including, but not limited to, structural design, building materials, site access, clearances, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, life safety features (e.g., automatic fire sprinkler systems, fire service access elevators, etc.) and would undergo LAFD fire/life safety plan review and LAFD's fire/life safety inspection to ensure compliance with the above, which would reduce the demand for fire protection services and also ensure adequate emergency access.

Furthermore, as with the Project, traffic generated by Alternative 3 would not significantly impact emergency vehicle response to the Project Site and surrounding area as the drivers of emergency vehicles have the ability to bypass traffic by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. The driveways and internal

circulation under Alternative 3 would also be designed to incorporate all applicable City Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

As discussed above, the development program under the Alternative 3 would be the same as under the Project (i.e., the same types and quantities of uses); therefore, the fire and domestic water need for Alternative 3 would be the same as the Project. As with the Project, Alternative 3 could potentially require replacing a portion of the existing 6-inch water main on Detroit Street, as well as installation of three new hydrants that will connect to the existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard, as determined by the LAFD and LADWP, to ensure that adequate fire flow is available. As discussed in Section IV.K.1 Utilities and Service Systems—Water Supply and Infrastructure, impacts associated with this potential infrastructure improvement would be less than significant. Therefore, similar to the Project, Alternative 3 would not necessitate the construction of new or altered government facilities (i.e., fire stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As previously described, the overall amount of construction activities and duration of construction would be reduced compared to the Project as Alternative 3 would eliminate the subterranean parking levels proposed by the Project. Similar to the Project, construction of Alternative 3 would not generate a permanent population on the Project Site that would substantially increase the police service population of the Wilshire Community Police Station because the daytime population generated during construction would be temporary in nature. As with the Project, Alternative 3 would implement similar project design features as the Project, which would include security fencing, lighting, and locked entry to secure construction areas of the Project Site during construction, thereby reducing demand for police protection services.

Furthermore, as previously discussed, Alternative 3 would implement a CTMP to ensure that adequate and safe access is available within and near the Project Site during construction activities. Lastly, pursuant to CVC Section 21806, emergency vehicles can use their sirens to clear a path of travel or drive in the lanes of opposing traffic during an emergency to avoid traffic. Therefore, as with the Project, construction of Alternative 3 would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project.

(b) Operation

As indicated in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, LAPD considers the residential population within their service area to evaluate service capacity. As previously discussed, Alternative 3 would include the same development program as the Project (the only difference being the development of above- rather than below-grade parking levels). Therefore, Alternative 3 would be expected to generate the same residential service population as the Project and the same level of demand for LAPD services and facilities within LAPD's Wilshire Division (i.e., Wilshire Community Police Station, etc.). Like the Project, Alternative 3 would implement similar project design features as the Project during operation, which would help reduce the demand for police services. Furthermore, as with the Project, Alternative 3 would generate revenues to the City's General Fund that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Therefore, Alternative 3, as with the Project, would not result in the need for new or altered government facilities (i.e., police stations), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

i. Transportation

As previously described, Alternative 3 would be developed within the same Project Site as the Project and would include the same uses as the Project. Alternative 3 would also include similar access points as the Project and the same number of vehicle parking spaces (i.e., 443). As such, the same transportation-related plans, policies, and programs applicable to the Project would also apply to Alternative 3. These include the Mobility Plan, Wilshire Community Plan, Miracle Mile CDO, Plan for a Healthy Los Angeles, LAMC, Vision Zero, and the Citywide Design Guidelines. As with the Project, Alternative 3 would not conflict with these plans, policies and regulations. In particular, Alternative 3 would represent a mixed-use development with multi-family residential uses and commercial uses and would be served by a variety of public transit options, including the future Metro D Line Wilshire/La Brea Station (located immediately east of the Project Site). As with the Project, this alternative would enhance pedestrian access within and around the Project Site as called for by the Mobility Plan and the Wilshire Community Plan; prioritize safety and access for all individuals utilizing the Project Site by complying with all ADA requirements as required by the LAMC; include public realm improvements (i.e., new street trees and landscaping); bicycle parking in accordance with LAMC requirements; and encourage walking, biking, and transit use as called for by the Wilshire Community Plan and Plan for a Healthy Los Angeles. Like the Project, Alternative 3 would also reduce VMT per capita for residents, including through the implementation of TDM strategies (e.g. the provision of short- and long-term bicycle parking that would serve to promote use of bicycles) as called for by the Mobility Plan, SCAG's RTP/SCS, and the City's TDM Ordinance. Furthermore, while Wilshire Boulevard has been identified as part of the Vision Zero's High Injury Network, no specific

Vision Zero projects are planned near the Project Site, and, as with the Project, Alternative 3 would not preclude future improvements by the City. Therefore, as with the Project, Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would be less than significant. The degree of the impacts would be similar between the Alternative 3 and the Project as neither would conflict with an applicable transportation plan.

Based on the population assumptions, with respect to VMT, both Alternative 3 and the Project would generate an average daily household VMT of 4.6 per capita and an average daily work VMT of 6.7 per capita, which would be below the average daily household VMT per capita significance threshold of 6.0 for the Central APC and below the average daily work VMT per capita significance threshold of 7.6 for the Central APC.⁹ Therefore, as with the Project, Alternative 3 would not conflict or be inconsistent with CEQA Guidelines Section 15064.3(b) regarding VMT. As such, the VMT impacts of Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

Regarding freeway off-ramp safety, as required by LADOT's Interim Guidance for Freeway Safety Analysis, if a project is not expected to generate more than 25 or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required. The Project would add fewer than 25 trips to all the freeway off-ramps in both the morning and afternoon peak hours such that further analysis was not required, and thus, the Project was determined to result in less-than-significant freeway off-ramp safety impacts.¹⁰ Since Alternative 3 would generate similar daily traffic compared to the Project, Alternative 3 would also result in less-than-significant freeway off-ramp safety impacts, and such impacts would be similar to the less-than-significant impacts of the Project.

j. Tribal Cultural Resources

As indicated in Section IV.J, Tribal Cultural Resources, of this Draft EIR, the SCCIC and SLF records search results were negative for tribal cultural resources or potential tribal cultural resources within the Project Site or a 0.5-mile radius. In addition, the consultations with the applicable California Native American Tribes conducted in accordance with AB 52 did not identify any tribal cultural resources on the Project Site.

As previously discussed, Alternative 3 would eliminate the four subterranean parking levels proposed by the Project. This would result in shallower maximum excavation depths under Alternative 3 (i.e., 40 feet below ground surface) than under the Project (i.e., 80 feet below ground surface). Notwithstanding, as the typical average depth for buried tribal

⁹ See Appendix L of this Draft EIR for VMT Calculator Outputs for Alternative 2.

¹⁰ Fehrs & Peers, Wilshire and Cloverdale Project Transportation Assessment, November 2024.

cultural resources in the Los Angeles Basin is approximately 12 feet below the surface, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be similar compared to that of the Project. In addition, like the Project, Alternative 3 would implement the City's standard COA for the inadvertent discovery of tribal cultural resources. Therefore, Alternative 3 would result in less-than-significant impacts with respect to tribal cultural resources, and such impacts would be similar to the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities for Alternative 3 would result in a temporary demand for dust control, cleaning of equipment, excavation, and grading/recompaction activities. Construction-related water use under Alternative 3 would be less than the Project as this alternative would eliminate the subterranean parking levels proposed by the Project. Furthermore, while Alternative 3 would require trenching for connection to the existing water mains in the adjacent streets similar to the Project, Alternative 3 would implement a CTMP to ensure the safe and efficient flow of vehicular and pedestrian traffic and that emergency access to the Project Site and adjacent properties would be maintained during the construction period. As such, as with the Project, Alternative 3 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts. Alternative 3 would result in less-than-significant impacts related to water supply and infrastructure, which would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 3 would include the same development program as the Project (the only difference being the development of above- rather than below-grade parking levels); therefore, Alternative 3 would result in the same water demand as the Project. Thus, the estimated water demand under Alternative 3 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2045. As with the Project, Alternative 3 could potentially require replacing a portion of the existing 6-inch water main on Detroit Street, as well as installation of three new hydrants that will connect to the existing water mains located along 8th Street, Cloverdale Avenue, and Wilshire Boulevard, as determined by the LAFD and LADWP, to ensure that adequate fire flow is available. As discussed above, the construction activities associated with these improvements would not cause significant environmental effects. Therefore, impacts to

water supply under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, temporary facilities (e.g., portable toilet, hand wash stations, etc.) would be provided by the construction contractor. Any sewage generated from these facilities would be collected and hauled off-site and would not be discharged into the public sewer system. Therefore, like the Project, wastewater generation from construction activities under Alternative 3 would not cause a measurable increase in wastewater flows.

As with the Project, Alternative 3 would require the installation of new on-site sewer line connections to connect the proposed uses to the existing off-site public sewer mains along the streets surrounding the Project Site. Construction impacts associated with the installation of new sewer line connections would primarily be confined to trenching in order to place the new sewer line connections below surface for connection into the existing off-site sewer public infrastructure. As with the Project, any off-site work that may affect services to the existing sewer lines in the vicinity of the Project Site would be coordinated with the City's BOE. In addition, similar to the Project, Alternative 3 would implement a CTMP to reduce any temporary pedestrian and traffic impacts that might result from trenching and installation of new sewer line connections. The CTMP would also ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. As such, as with the Project, Alternative 3 would not result in construction activities that require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental impacts.

Therefore, based on the above, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As previously discussed, Alternative 3 would include the same development program as the Project (the only difference being the development of above- rather than below-grade parking levels); therefore, wastewater generation under Alternative 3 would be similar to the Project's estimated wastewater flow. Since the Project's wastewater flows would be accommodated by the existing infrastructure, the wastewater generated by Alternative 3 would also be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that wastewater flows generated by Alternative 3 would be similar to the estimated wastewater flow of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to accommodate the flows from Alternative 3. In addition, sanitary sewer connections and on-site infrastructure would be designed and constructed in accordance with applicable LASAN and California Plumbing Code standards. Therefore, operational impacts with regard to wastewater generation and infrastructure capacity under Alternative 3 would be less than significant and similar to the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

As previously noted, the overall energy demand during construction of Alternative 3 would be reduced compared to the Project due to the reduction in excavation activities. Therefore, as with the Project, impacts on infrastructure capacity associated with short-term construction activities under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. Alternative 3 operation would result in a similar electricity and natural gas consumption as the Project due to the development of the same type and amount of uses under this alternative. Since the existing electricity and natural gas infrastructure would be adequate to serve Project operation, existing energy infrastructure would be adequate to serve operation of Alternative 3. Furthermore, as with the Project, Alternative 3 would be developed in accordance with applicable energy conservation requirements, including those in current version of Title 24, CALGreen Code and the Los Angeles Green Building Code in effect at the time of building permit issuance, and would implement Project Design Feature GHG-PDF-1, which prohibits the use of natural gas during Project operations, excluding restaurant cooking equipment, all of which would minimize electricity and natural gas consumption. Therefore, as with the Project, Alternative 3 operation would not result in an increase in energy demand that would exceed available supplies or distribution infrastructure capabilities that would require the construction of new or expanded energy facilities, the construction or relocation of which could cause significant environmental effects. Thus, operational impacts under Alternative 3 would be less-than-significant and similar when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

Alternative 3 would not avoid or substantially lessen the Project-level and cumulative significant and unavoidable impacts with respect to on- and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). These impacts would continue to be significant and unavoidable under Alternative 3, although the duration of such impacts would be reduced due to the overall reduction in excavation activities and export of soils under Alternative 3.

Alternative 3 would result in similar impacts associated with the following environmental topics where the Project's impacts were concluded to be less than significant with mitigation: on- and off-site vibration during construction (pursuant to the significance threshold for building damage).

Alternative 3 would result in less than significant with mitigation impacts associated with paleontological resources that would be less than the less-than-significant with mitigation impacts of the Project.

Alternative 3 would result in similar less-than-significant impacts as the Project with regard to the following topics: operational regional and local air pollutant emissions, TACs (operation), historical resources, energy (operation), GHG emissions, land use and planning, public services (fire protection and police protection) (operation), transportation (conflicts with transportation plans, VMT, and freeway off ramp safety), water supply and infrastructure (operation), wastewater (construction and operation), and energy infrastructure (operation).

Alternative 3 would reduce several of the less-than-significant impacts associated with the Project, including those related to the following: construction regional and local air pollutant emissions, TACs (construction), archaeological resources, energy (construction), noise (operation), public services (fire protection and police protection) (construction), water supply and infrastructure (construction), and energy infrastructure (construction).

4. Relationship of the Alternative to Project Objectives

As indicated previously, Alternative 3 would develop the Project Site with the same development program as the Project, except that parking would be provided in above-grade rather than below-grade parking levels. Accordingly, Alternative 3 would meet the underlying purpose of the Project, which is to promote the revitalization of the Wilshire community and the surrounding area by transforming the underutilized infill Project Site while preserving existing contributors to the Miracle Mile Historic District, and integrating

high-density multi-family housing uses and ground floor commercial space in close proximity to a future rail station.

Regarding the Project objectives, Alternative 3 would meet all the objectives of the Project, as listed below, as effectively as the Project:

- Provide housing to further the goals of the City's Housing Element and help the City meet its Regional Housing Needs Assessment obligations.
- Provide housing with a range of unit types, affordability levels, and sizes adjacent to public transit, to serve the surrounding area and citywide market.
- Ensure that the Wilshire Community's historically significant resources are protected, preserved, and enhanced.
- Promote development that preserves and enhances the physical appearance of the corridor and contributes to the Miracle Mile's unique historical context.
- Reduce vehicle miles traveled (VMT), consistent with the objectives of SCAG's 2024–2050 Regional Transportation Plan/Sustainable Communities Strategy, by locating high-density residential uses near a future regional-serving transit hub (i.e., the Metro D Line Wilshire/La Brea Station) and an abundance of new and existing commercial uses that will provide services to residents and employment opportunities.
- Promote resource and energy conservation by incorporating sustainable building design and construction standards above Title 24 (CALGreen) code requirements.
- Provide fiscal benefits, economic development, and job creation by generating tax revenues for the City and creating jobs during project operation and construction.

V. Alternatives

D. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, the No Project Alternative; Alternative 2, the Reduced Density Alternative; and Alternative 3, the Reduced Excavation Alternative. Table V-2 on page V-10 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

As previously discussed, implementation of the Project would result in significant and unavoidable impacts regarding the following: on- and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance). Cumulative impacts with respect to on- and off-site noise during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also be significant and unavoidable. Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project Alternative, would avoid all of the Project’s significant environmental impacts. However, Alternative 1 would not meet any of the Project’s objectives or underlying purpose to promote the revitalization of the Wilshire community and the surrounding area by transforming the underutilized Project Site while preserving existing contributors to the Miracle Mile Historic District and integrate high-density multi-family housing uses and ground floor commercial space in close proximity to a future rail station.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 2, the Reduced Density Alternative, would be the Environmentally Superior Alternative. As described in Table V-1 on page V-4, Alternative 2 would include the same uses proposed under the Project while reducing the

amount of total new floor area proposed under the Project by approximately 25 percent. This reduction in overall total new floor area would result in a corresponding decrease in the environmental impacts of Alternative 2. Specifically, while Alternative 2 (and Alternative 3) would not avoid the Project-level and cumulative significant and unavoidable impacts with respect to on- and off-site noise sources during construction and on- and off-site vibration during construction (pursuant to the significance threshold for human annoyance), it would: (1) reduce these impacts; (2) reduce the Project's less than significant with mitigation impacts (i.e., paleontological resources); and (3) reduce the majority of the Project's less than significant impacts. Furthermore, Alternative 2 would not result in greater impacts compared to the Project. Comparatively, Alternative 3 would include the same amount of new floor area as the Project while eliminating the subterranean parking thereby resulting in generally similar environmental impacts as the Project.

In summary, based on the above and as summarized in Table V-2 on page V-10, while Alternative 2 would not avoid the Project's significant and unavoidable impacts, Alternative 2 would reduce more of the Project's environmental impacts than Alternative 3, and in many cases to a greater extent. Lastly, as indicated previously, Alternative 2 would not result in greater impacts than the Project. Therefore, of the range of alternatives analyzed, Alternative 2, the Reduced Density Alternative, would be the Environmentally Superior Alternative.