

I. Executive Summary

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of the Draft Environmental Impact Report (EIR) contains a brief summary of the 3822 South Figueroa Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, an overview of existing Project Site conditions, a general description of the Project, issues raised during the Notice of Preparation (NOP) process, including areas of controversy, a description of the public review process for this Draft EIR, a summary of environmental impacts, a list of the Project Design Features (PDFs) and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR that would reduce or avoid impacts, including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in Section 15121 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or that potentially may be significant. Feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This Draft EIR is a "Project EIR," as defined by Section 15161 of the CEQA Guidelines. Furthermore, this Draft EIR complies with Section 15064 of the CEQA Guidelines, which discusses determining the significance of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Land Use and Climate Innovation, responsible agencies, owners and occupants within a 500-foot radius of the Project Site, and all other interested parties on April 2, 2025 for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental impact area is or

is not analyzed further in this Draft EIR. The City determined through the Initial Study that the environmental factors listed below would be potentially impacted by the Project:

- Air Quality
- Cultural Resources
- Greenhouse Gas Emissions
- Land Use and Planning
- Noise
- Public Services (Fire Protection and Police Protection)
- Transportation
- Tribal Cultural Resources

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to: aesthetics; agriculture and forestry resources; air quality (odors); biological resources; energy; geology and soils; hazards and hazardous materials; hydrology and water quality; land use (physical division of an established community); mineral resources; noise (airport or airstrip-related hazards); population and housing; public services (schools, parks, and other public facilities); recreation; transportation (hazards due to a geometric design feature); utilities and service systems; and wildfire. Therefore, these topics are not analyzed further in this Draft EIR. The Initial Study, which demonstrated that no significant impacts would occur for these issue areas, is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of the Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, existing conditions, Project summary, issues raised during the NOP process, including areas of controversy, public review process, summary of environmental impacts, project design features, mitigation measures, and summary of alternatives.
- II. **Project Description.** This section describes the location, existing conditions, objectives, and characteristics of the Project, and identifies requested permits and approvals.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects in the vicinity of the Project Site.
- IV. **Environmental Impact Analysis.** This section contains the environmental setting for the specific environmental topics, Project and cumulative impact analyses, project design features (where applicable), mitigation measures (where

necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources; greenhouse gas emissions; land use and planning; noise; public services (fire protection and police protection); transportation; and tribal cultural resources.

- V. Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project Alternative; Historic Preservation Alternative; Partial Preservation Alternative; and Complies with Existing Zoning Alternative.
- VI. Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also included. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.
- VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers.** This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A Initial Study, Notice of Preparation (NOP), and NOP Comment Letters
 - Appendix A-1 Initial Study
 - Appendix A-2 Notice of Preparation (NOP)
 - Appendix A-3 NOP Comment Letters
- Appendix B Air Quality Assessment
- Appendix C Historic Resources Technical Report
- Appendix D Archaeological Resources Assessment
- Appendix E Greenhouse Gas Emissions Assessment
- Appendix F Land Use Tables

- Appendix G Noise and Vibration Assessment
- Appendix H Public Service Provider Response Letters
- Appendix I Transportation
- Appendix J Civil Engineering Report
- Appendix K Operational Air Quality, Greenhouse Gas, Energy, and Noise Analysis Utilizing VMT Calculator Data
- Appendix L Tribal Cultural Resources Correspondence

4. Existing Project Site Conditions

The 1.4-acre Project Site is located at 3822-3828 South Figueroa Street; 3801-3833 ½ South Flower Drive; and 468-470 West 39th Street (APN 5037-031-001 to -007, -015, -016) directly east of Exposition Park within an urbanized area approximately two miles southwest of Downtown Los Angeles. The Project Site is generally bounded by South Figueroa Street to the west, West 38th Street to the north, South Flower Drive and the Interstate 110 (I-110) freeway to the east, and existing residential uses and an auto servicing center to the south.

The Project Site is relatively flat with limited landscaping. Existing landscaping within the Project Site includes a total of 14 on-site trees and nine street trees located within the public right-of-way surrounding the Project Site. Existing on-site trees include species such as Mexican Fan Palm, Spineless Yucca, and Queen Palm. None of the on-site trees or street trees are protected by the City of Los Angeles Protected Tree and Shrubs Ordinance No. 186,873.

The eastern portion of the Project Site is within the boundaries of the Flower Drive Historic District, which is a designated historic resource per the California Register of Historic Resources (CRHR), and which was determined eligible for listing in the California Register by the State Historical Resources Commission (SHRC) in 2008. As such, the district as a whole and each of its contributors are considered historical resources for the purposes of CEQA.

The Project Site is currently developed with seven, two-story multi-family residential buildings that are part of the Flower Drive Historic District along Flower Drive, and a two-story multi-family residential building and surface parking along South Figueroa Street. Six of the buildings within the Flower Drive Historic District are considered contributing resources, and one building is considered a non-contributing resource. All existing households on the Project Site would be subject to the City's Rent Stabilization Ordinance (RSO), and lower income households on the Project Site are entitled to relocation benefits subject to Government Code Section 7260 et seq. as well as the right of first refusal (Right to Return) to a comparable unit (same bedroom type) when the Project is completed.

The Los Angeles County Metropolitan Transportation Authority (Metro) operates multiple rail and bus-rapid transit lines that serve the Project Site. The Project Site is approximately 0.3 miles from the Expo Park and USC Metro rail stations which serve the Metro E Line and provides service to Santa Monica and Downtown Los Angeles. Metro also operates multiple local and express bus lines and stops within a 0.5-mile radius that serve the Project Site, including the 2,

81, and 550 Lines. The Los Angeles Department of Transportation (LADOT) also serves the Project Site with the DASH Southeast and DASH King-East service routes, with a stop located approximately 400 feet south of the Project Site along South Figueroa Street. The Project Site is located within the boundaries of the Greater Downtown Housing Incentive Area, the Exposition/University Park Redevelopment Project Area, a Transit Priority Area, the Los Angeles State Enterprise Zone, the South Los Angeles Alcohol Sales Specific Plan, and the North University Park-Exposition Park-West Adams Neighborhood Stabilization Overlay (NSO) Zone (although the NSO overlay is not applicable to the Project since it has a frontage along South Figueroa Street, pursuant to Ordinance 180218).

The area surrounding the Project Site is urbanized and includes a mix of low- to mid-rise buildings containing a variety of commercial, residential and public facilities uses. The surrounding properties are generally zoned C2-1L, RD1.5-1, and PF-1, which are generally consistent with the zoning on the Project Site. Bordering the Project Site to the south are two, two-story multi-family units, surface parking, and commercial uses (currently an auto servicing center) which are zoned C2-1L and RD1.5-1. Further south across West 39th Street is the 3900 South Figueroa Street mixed-use project currently under construction. The western portion of the Project Site fronting South Figueroa Street is bordered to the north by the seven-story “Hub Los Angeles Coliseum,” a private student housing development that includes ground floor retail, multi-family units, surface parking, and commercial uses.

Exposition Park is located west of the Project Site across South Figueroa Street and includes the Los Angeles Memorial Coliseum, the BMO Stadium, the California Science Center, the Dr. Theodore T. Alexander Jr. Science Center School, the California African American Museum, the Los Angeles County Natural History Museum, the Exposition Park Rose Garden, the Wallis Annenberg Building, the Expo Center, and the Lucas Museum of Narrative Art which is currently under construction. To the north of the Project Site across West 38th Street are commercial and residential developments including the University of Southern California’s (USC) University Park Campus and Garrett Gardens apartment complex. To the east of the Project Site across South Flower Drive is the I-110 freeway.

5. Description of the Project

The Project proposes to develop a new seven-story mixed-use building comprised of 209 dwelling units, including 16 units for Low-Income households, 22 units for Very Low-Income households, and four units for Extremely Low-Income households and 2,705 square feet of ground level retail and restaurant uses. The Project would have a maximum building height of 86 feet and a total floor area of 252,148 square feet on a 62,988 square-foot (1.4-acre) Project Site, for a FAR of 4.5:1. The Project would include 23,127 square feet of open space consisting of private patios, courtyard areas, roof decks, and indoor amenities for residents, as well as 34 residential parking spaces and six commercial parking spaces at the ground level. The Project involves the demolition of eight multi-family residential buildings (seven of which are within the Flower Drive Historic District), and the removal of existing surface parking areas. The 209 residential units would consist of 34 studios, 43 one-bedroom units, 45 two-bedroom units, 34 three-bedroom units, and 53 four-bedroom units.

The Project would provide 23,127 square feet of open space that would contain amenities such as courtyards, a pool, roof decks, recreation rooms, and private patios. Open space areas would be accessible from South Figueroa Street, West 38th Street, and from the interior of the Project Site. The landscape design would emphasize native and drought-tolerant shrubs and grasses and ornamental trees. The Project would provide 54 new trees on the Project Site (one tree provided for every four units, per LAMC Section 12.21 G).

Vehicular access to the Project Site would be provided by a new driveway with access along South Flower Drive that would provide ingress and egress into the wrapped at-grade parking garage. Per AB 2097, the Project is not required to provide a minimum number of parking spaces as it is a mixed-use residential project located 0.3 miles from a major transit stop served by an existing rail transit station and two or more bus lines within a 20-minute service interval during the morning and afternoon commute periods, as described above. Nonetheless, the Project would voluntarily include 40 vehicle spaces, consisting of 34 parking spaces for residents and six parking spaces for visitors. The Project would provide 36 EV Ready spaces (all 34 of the residential parking spaces and 25 percent, or two, of the commercial parking spaces would be EV Ready) and would further be subject to the most updated version of the California Green Building Code at time of Project filing. The Project would also provide short- and long-term bicycle spaces for both residential and commercial uses. A total of 16 short-term bicycle spaces would be located on South Figueroa Street and West 38th Street in bike racks proposed to be located in the public right-of-way. In addition, 130 long-term bicycle spaces would be located on the ground floor of the Project Site within the at-grade parking garage with access from the main entrance lobby and parking garage. Residential access would be provided from the ground floor to the main lobby along South Figueroa Street and a secondary lobby along West 38th Street. Retail and restaurant access for pedestrians would be provided from the ground floor along South Figueroa Street.

6. Areas of Controversy

Based on the NOP comment letters provided in Appendix A of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts associated with aesthetics, air quality, cultural and historic resources, greenhouse gas, land use, noise, population and housing, public services, safety, traffic, cumulative impacts, and utilities. In addition, agencies such as Caltrans and the South Coast Air Quality Management District (SCAQMD) submitted NOP comment letters that provided input for evaluating the impacts of the Project. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters received during the NOP comment period.

7. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Land Use and Climate Innovation, responsible agencies, and other interested parties on April 2, 2025, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR.

This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

8. Summary of Environmental Impacts

Table I-1 below summarizes the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis 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 regard to direct Project and cumulative impacts on historic resources.

Table I-1: Summary of Impacts Under the Project

Environmental Topic	Project Impact Determination
A. Air Quality	
Regional Emissions	
Construction	Less Than Significant
Operation	Less Than Significant
Localized Emissions	
Construction	Less Than Significant
Operation	Less Than Significant
Toxic Air Contaminants	
Construction	Less Than Significant
Operation	Less Than Significant
B. Cultural Resources	
Archaeological Resources	Less Than Significant
Historic Resources	Significant and Unavoidable
C. Greenhouse Gas Emissions	
Greenhouse Gas Emissions	Less Than Significant
D. Land Use and Planning	
Conflict with Land Use Plans	Less Than Significant
E. Noise	
Construction	
On-Site Noise	Less Than Significant with Mitigation
Off-Site Noise	Less Than Significant
On-Site Vibration (Building Damage)	Less Than Significant with Mitigation
On-Site Vibration (Human Annoyance)	Less Than Significant
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance)	Less Than Significant
Operation	
On-Site Noise	Less Than Significant
Off-Site Noise	Less Than Significant
F. Public Services	
Fire Protection	

Environmental Topic	Project Impact Determination
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
G. Transportation	
Conflict with Transportation Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant
Hazardous Geometric Design Features	Less Than Significant
Emergency Access	Less Than Significant
H. Tribal Cultural Resources	
Tribal Cultural Resources	Less Than Significant

9. Project Design Features

The following project design features would be implemented as part of the Project:

a. Air Quality

Project Design Feature AQ-PDF-1: Off-Road Diesel-Powered Construction Equipment. All off-road diesel-powered construction equipment greater than 90 horsepower would meet California Air Resources Board Tier 4 Final off-road emissions standards. Requirements for Tier 4 Final equipment will be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's Best Available Control Technology (BACT) documentation (certified tier specification or model year specification), and CARB or SCAQMD operating permit (if applicable) will be provided to the City upon request.

b. Cultural Resources

Project Design Feature CUL-PDF-1: Prior to initiating ground-disturbing activities, the Project applicant shall retain a qualified professional archaeologist meeting Secretary of the Interior professional qualifications (Project Archaeologist). Archaeological Resources Training shall be provided to all construction managers and construction personnel engaged in relevant job activities prior to commencing any ground disturbance work within the Project Site. The training shall be prepared and conducted by a qualified professional archaeologist meeting Secretary of the Interior professional qualifications. The training content shall include, but not be limited to, information about archaeological resources in the vicinity, types of common archaeological resources in southern California, and the procedures to be followed to protect any such resources in the case of inadvertent discovery. The training may be discontinued when ground disturbance activities for the Project are completed. Construction personnel shall not be permitted to operate equipment within the construction area during the relevant construction period unless they

have attended the training. A copy of the training transcript and/or training video, as well as a list of the names of all personnel who attended the training shall be maintained by the Project.

Project Design Feature CUL-PDF-2: The Project Archaeologist shall monitor, or supervise archaeological monitors (Monitors), for as needed and intermittent archaeological monitoring during ground disturbing activities. Archaeological monitoring will begin once excavation reaches the bottom of the artificial fill layer, which is approximately four feet below ground surface. After initiation, intermittent archaeological monitoring shall occur for a minimum of 20 hours per week. The Project Archaeologist shall have the ability to recommend monitoring be decreased or eliminated after the first two weeks of spot monitoring during ground-disturbing activities below four feet are complete. The recommendation shall be based on the absence of cultural resources and/or indication of subsurface soils possessing a low likelihood for significant intact resources. In the event that archaeological resources are inadvertently unearthed or encountered during excavation and grading activities, the Project Archaeologist/Monitors may request that construction halt within 50 feet of the find and the Project Archaeologist shall record and assess the resource. Actions recommended by the Project Archaeologist to manage the discovery, such as avoidance or excavation of the find, shall be adhered to and documented within the resource record.

c. Noise

Project Design Feature NOI-PDF-1: Operation of permanently wired amplified sound systems at the rooftop pool deck and ground floor parklets shall be limited to between the hours of 7:00 a.m. and 10:00 p.m. and shall not exceed a volume of 80 dBA measured at 3 feet from any speaker. In addition, all speakers shall be designed and installed to direct sound toward the center of the Project terraces.

d. Police Protection

Project Design Feature POL-PDF-1: During construction, the Project shall implement temporary security measures, including security fencing, lighting, and locked entry. The Project Site would be monitored via surveillance cameras, security on-site, or security drive-by patrols depending on the stage of construction to monitor the Project Site during nighttime hours.

Project Design Feature POL-PDF-2: The Project shall provide sufficient lighting of building entries and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.

Project Design Feature POL-PDF-3: Prior to the issuance of a building permit, the Project Applicant shall consult with LAPD's Crime Prevention Unit regarding the incorporation of features that are appropriate for the design of the Project, including applicable features in LAPD's "Design Out Crime" Guidelines.

Project Design Feature POL-PDF-4: Upon completion of construction of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a

diagram of the Project Site to the LAPD's Southwest Community Police Station's Commanding Officer that includes access routes and any additional information that might facilitate police response.

e. Transportation

Project Design Feature TRAF-PDF-1: Construction Traffic Management Plan: The contractor would develop a detailed Construction Traffic Management Plan as part of the Project, including provision of construction worker parking in designated areas, temporary traffic controls during all construction activities adjacent to public right-of-ways, street closure information, detour plans, haul routes, and staging plans among other provisions. The contractor would submit the Construction Traffic Management Plan to the City of Los Angeles for approval. The Construction Management Plan would include the following:

- Scheduling workdays to begin and end prior to the morning and afternoon peak hours, respectively, to the extent feasible so as to avoid worker trips during those peak hours.
- Coordination with various City departments and offices to ensure adequate access to the Project Site and land uses in proximity of the Project Site is maintained.
- Scheduling pick-ups, deliveries, and exports of construction materials so as to occur during off-peak hours. Hauling shall be from 9:00 A.M. to 3:00 P.M. weekdays, and 8:00 A.M. to 4:00 P.M. on Saturdays. No hauling shall be performed on Sundays and holidays.
- Reduce the potential of trucks waiting for extended periods to load or unload.
- Provision of worker parking on-site or in designated off-site private parking areas and prohibition of construction-related vehicle parking on surrounding streets, other than the streets adjacent to the Project Site.
- Temporary traffic controls during all construction activities adjacent to public ROWs to improve traffic flow on public roadways (e.g., flag personnel) and to maintain access for land uses in the vicinity of the Project Site. Determine the number and location of flag personnel required during traffic rerouting and deliveries.
- Contractor to post advance bilingual notification to adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation, at several locations on the Project Site.
- Establish requirements for storage of materials and loading/unloading on the Project Site.
- Worksite traffic control plans approved by the City would be implemented to route vehicles, bicyclist and pedestrians around the area during any parking,

travel lane or sidewalk closures and provide for protective measures for the public.

- Maintenance of a log, available on the job site, documenting the dates of hauling and the number of trips (i.e., trucks) per day.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.

10. Mitigation Measures

The following mitigation measures would be implemented as part of the Project:

a. Cultural Resources

Mitigation Measure CUL-MM-1: Interpretive Display. The Applicant shall prepare an interpretive display consisting of at least one panel and install the display(s) in a location visible from the public right-of-way along South Flower Drive between West 38th Street and West 39th Street. The interpretive display shall include a brief history of the area as well as the district and its significance within the context of multi-family residential housing development. The text in the interpretive display shall be accompanied by photographs of the district and other available visual ephemera, such as historic maps and aerial images. The interpretive display shall be professionally written and designed. The written content shall be prepared by a person or persons meeting the Secretary of the Interior's Professional Qualifications Standards for history and/or architectural history. Prior to fabrication and installation of the interpretive display, a digital draft shall be made available to the City of Los Angeles Office of Historic Resources staff for review and comment. The finished interpretive display shall be installed prior to the issuance of the final Certificate of Occupancy.

Mitigation Measure CUL-MM-2: Updated California Register Nomination. The Applicant shall submit an updated California Register historic district nomination for the contributing buildings remaining after construction of the project prior to the issuance of the final Certificate of Occupancy. The nomination shall be prepared in accordance with OHP instructions by a person or persons meeting the Secretary of the Interior's Professional Qualifications Standards for history and/or architectural history. The photographic documentation shall be carried out only after framing and exterior finishes, at a minimum, of the proposed multi-family building are complete, in order to convey a full understanding of the changes to feeling and setting. This mitigation measure will be considered complete when the Applicant ensures the nomination is prepared and submitted to OHP for consideration.

b. Noise

Mitigation Measure NOI-MM-1: Noise Shielding and Muffling. Power construction equipment (including combustion engines), fixed or mobile, shall be equipped with noise shielding and muffling devices consistent with manufacturers' standards or the Best Available Control Technology. All equipment shall be properly maintained, and the Applicant or Owner shall require any construction contractor to keep documentation on-site during any earthwork or construction activities demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

Mitigation Measure NOI-MM-2: Enclosure or Screening of Outdoor Mechanical Equipment. All outdoor mechanical equipment (e.g., generators, compressors) shall be enclosed or visually screened. The equipment enclosure or screen shall be impermeable (i.e., solid material with minimum weight of two pounds per square foot) and break the line-of-sight between the equipment and any off-site Noise Sensitive Uses.

Mitigation Measure NOI-MM-3: Location of Construction Staging Areas. Construction staging areas shall be located as far from Noise-Sensitive Uses as reasonably possible and technically feasible in consideration of site boundaries, topography, intervening roads and uses, and operational constraints. The burden of proving what constitutes "as far as possible" shall be upon the Applicant or Owner, in consideration of the above factors.

Mitigation Measure NOI-MM-4: Temporary Walls. Noise barriers, such as temporary walls (minimum ½-inch thick plywood) or sound blankets (minimum STC 25 rating), that are a minimum of eight feet tall, shall be erected between construction activities and Noise-Sensitive Uses to achieve a minimum reduction of 5 dBA at sensitive residential receptors located adjacent to the west and south of the Project Site.

Mitigation Measure NOI-MM-5: Baseline Survey and Vibration Control Plan. Prior to demolition, grading/excavation, or construction, the Applicant shall retain the services of a Qualified Structural Engineer who shall prepare a survey establishing baseline structural conditions of potentially affected structures and a Vibration Control Plan, which shall include methods to minimize vibration, including, but not limited to:

- Documentation of a visual inspection of the potentially affected structures (by video and/or photography) to note the apparent physical condition of the buildings (e.g., cracks, broken panes, etc.);
- Details on types of equipment to be used, estimated vibration velocities, and distance to receptors;
- A shoring design to protect the identified structures from potential damage;
- Details on the equipment and/or alternative construction techniques to be used within the required setbacks to ensure that vibration velocities do not exceed

potential structural damage thresholds of 0.25 in/sec PPV at the historic structures to the south of the Project Site (along South Flower Drive), 0.30 in/sec PPV at the older residential uses to the south of the Project Site (along South Figueroa Street), or 0.50 in/sec PPV at residential uses to the north of West 38th Street or the groundborne noise threshold of 93 VdB at adjacent residential uses.

Mitigation Measure NOI-MM-6: Construction Vibration (Except Shoring). Prior to construction, the Applicant shall retain a contractor to manage Project construction. The contractor shall ensure that when in operation, construction equipment such as vibratory compactors/rollers, large bulldozers/caisson drills, and loaded trucks are prohibited within 30 feet, 17 feet, and 16 feet, respectively, of any adjacent residential structures to ensure that vibration velocities would not exceed 93 VdB. This measure does not apply to temporary shoring activities or shoring infrastructure that must be installed to provide adequate physical support for excavation.

Mitigation Measure NOI-MM-7: Repair of Damage. In the event of damage to any non-historic building due to construction vibration, as verified by the Qualified Structural Engineer, a letter describing the damage to the impacted building(s) and recommendations for repair shall be prepared by the Qualified Structural Engineer within 60 days of the time when damage occurred. Repairs shall be undertaken and completed, at the Owner's or Applicant's expense, in conformance with all applicable codes.

In the event of vibration damage to any building that is designated or determined to be a historic resource pursuant to local or state law or that is determined to be potentially eligible for historic designation in a Historic Resources Survey, a letter describing the damage to the impacted building(s) and recommendations for repair shall be prepared by a Qualified Historian within 60 days of the time when damage occurred. Repairs shall be undertaken and completed, at the Owner's or Applicant's expense, in conformance with the California Historical Building Code (Title 24, Part 8) as well as the Secretary of the Interior's Standards for the Treatment of Historic Properties and associated guidelines, as applicable and as determined by a Qualified Historian.

11. Summary of Alternatives

This Draft EIR examined four alternatives to the Project, including the No Project Alternative, the Historic Preservation Alternative, the Partial Preservation Alternative, and the Complies with Existing Zoning Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project Alternative

In accordance with CEQA Guidelines, the No Project Alternative (Alternative 1) for a development project on an identifiable property consists of the circumstances under which the project does not proceed. Section 15125.6(e)(3)(B) of the CEQA Guidelines states in part that “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environment setting is maintained.” Therefore, for the purpose of this analysis, Alternative 1, 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 under existing conditions.

Specifically, the existing seven, two-story multi-family residential buildings that are part of the Flower Drive Historic District along South Flower Drive, and a two-story multi-family residential building and surface parking along South Figueroa Street would remain on the Project Site, and no new construction would occur.

Alternative 1 would avoid the Project’s significant and unavoidable direct impacts on historic resources, as no development would occur and the historic resources on the Project Site would not be demolished. Additionally, Alternative 1 would avoid the significant and unavoidable cumulative impact to historic resources that would occur in conjunction with The Fig Project (Related Project No. 6) because Alternative 1 would not have a cumulatively considerable contribution to the impact on contributing resources on the Project Site. In addition, Alternative 1 would result in no impact in all other topical areas, which would result in either less than significant or less than significant with mitigation impacts caused by the Project. Therefore, impacts associated with all environmental issues discussed in the Draft EIR would be less than the impacts caused by the Project.

b. Alternative 2: Historic Preservation Alternative

The Historic Preservation Alternative (Alternative 2) would preserve six multi-family residential buildings that are contributing resources to the Flower Drive Historic District (3801 South Flower Drive and 468 West 38th Street, 3813-3815 South Flower Drive, 3819 South Flower Drive, 3821-3823 South Flower Drive, 3825-3829 South Flower Drive and 3831-3833 South Flower Drive) on the Project Site and demolish one multi-family residential building that is a non-contributing resource on the Project Site (3809-3811 South Flower Drive). Alternative 2 would not result in the demolition of historical resources on the Project Site; however, Alternative 2 would alter the immediate surroundings of the Flower Drive Historic District by constructing a new three-story multi-family residential building with increased residential density on the portion of the Project Site containing the non-contributing building (within the Flower Drive Historic District boundary), and a new twenty-one-story mixed-use building at 3822-3828 South Figueroa Street (immediately outside the Flower Drive Historic District boundary). Alternative 2 would involve less demolition than the Project due to the retention of six of the existing buildings on the Project Site.

Alternative 2 would include the development of 137 residential units and 2,480 square feet of commercial space. The twenty-one-story mixed-use building would contain the commercial development and 132 units with one level of subterranean parking and the three-story multi-family

residential building would contain five additional units. This alternative would utilize state Density Bonus Program incentives and waivers to obtain additional height and floor area in excess of LAMC requirements to maximize new residential density on portions of the Project Site that do not contain historic contributors while following the Project's objectives and supporting its economic viability.

Alternative 2 would avoid the significant and unavoidable impacts related to historic resources because it would not demolish any of the six historic contributor buildings on the Project Site. Due to the reduced number of dwelling units that would be developed under this Alternative, Alternative 2 would result in less impacts than the Project related to operational air quality impacts, GHG emissions, operational noise, and public services. Given that Alternative 2 would include a reduced number of residential units in a Transit Priority Area (TPA), it is expected that Alternative 2 would have a greater impact related to VMT. As such, under Alternative 2, impacts to VMT would be greater than the less than significant impact of the Project, but would remain less than significant. In all other environmental areas analyzed above, Alternative 2 would result in similar impacts to the Project.

c. Alternative 3: Partial Preservation Alternative

The Partial Preservation Alternative (Alternative 3) would involve demolition of two contributing buildings and one non-contributing building to the Flower Drive Historic District on the Project Site (3801 – 3815 South Flower Drive), while preserving four contiguous contributing buildings (3819 – 3833 South Flower Drive). Two new four-story buildings would be constructed, one within the boundaries of the Flower Drive Historic District at 3801 – 3815 South Flower Drive, and one immediately outside the Flower Historic District at 3822 – 3828 ½ South Figueroa Street. Alternative 3 would include 58 residential dwelling units, including 12 affordable units, and the development of 2,160 square feet of ground floor commercial uses. Demolition and grading would be less than the Project as fewer existing buildings would be demolished and fewer units would be constructed.

Alternative 3 would not avoid the significant and unavoidable impacts related to historic resources because demolition of two historic contributor buildings would still occur; however, due to the lower scale of proposed development and preservation of additional contributors, the new construction would be more visually compatible with the remaining two-story contributors to the Flower Drive Historic District and would preserve more of the remaining Flower Drive Historic District, thus reducing the severity of the significant and unavoidable impact. Changes to the setting within and immediately surrounding the Flower Drive Historic District would also be reduced. Therefore, direct and cumulative impacts to historical resources under Alternative 3 would remain significant and unavoidable, but they would be lessened as compared to the Project.

Due to the reduced number of dwelling units and commercial uses and preservation of historic structures, Alternative 3 would result in less impacts than the Project related to operational air quality impacts, historic impacts, GHG emissions, operational noise, and public services. Impacts to VMT would be greater than the Project. In all other environmental areas analyzed above, Alternative 3 would result in similar impacts to the Project.

d. Alternative 4: Complies with Existing Zoning Alternative

Alternative 4, Complies with Existing Zoning Alternative (Alternative 4), would consist of a development of two buildings with a maximum height of three stories (45 feet in height), which is fully consistent with the current zoning applicable to the Project Site without any density bonus units, incentives, or waivers provided by the inclusion of affordable housing. Under existing conditions, the Project Site is split-zoned. Lots fronting South Figueroa Street are zoned C2-1L (“Figueroa Lots”), while lots fronting South Flower Drive are zoned RD1.5-1 (“Flower Lots”). Pursuant to the development standards for these zones, development on the Flower Lots would have a front yard setback of 15 feet, side yard setbacks of seven feet, and a rear yard setback of 15 feet (assuming four stories of development). The Figueroa Lots would be built to a residential density of one dwelling unit per 400 square feet of lot area, and a floor area ratio (FAR) of 1.5:1. The Flower Lots would be built to a density of one dwelling unit per 1,500 square feet of lot area, and a FAR of 3:1. Therefore, Alternative 4 would total approximately 168,164 square feet and would contain a total of 68 residential units. Alternative 4 would also not include any affordable housing, thus eliminating the 42 affordable housing units provided by the Project. However, Alternative 4 would still contain 2,705 square feet of commercial uses as proposed under the Project.

Like the Project, Alternative 4 would involve the demolition of six contributing buildings and one non-contributing building to the Flower Drive Historic District, and a new three-story building would be constructed within the boundaries of the Flower Drive Historic District. Additionally, a second three-story building would be constructed immediately outside of the Flower Drive Historic District at 3822-3828 Figueroa Street.

Alternative 4 would not avoid the significant and unavoidable impacts related to historic resources because demolition of the six historic contributor buildings would still occur, though this Alternative would reduce indirect impacts to the Flower Drive Historic District, as it would construct a three story building along South Figueroa Street and a second, three-story building along South Flower Drive, resulting in a total of 68 units which would be more similar in scale to the existing development surrounding the Project Site and within the Flower Drive Historic District. Due to the reduced number of dwelling units that would be developed under this Alternative, Alternative 4 would result in less impacts than the Project related to operational air quality impacts, GHG emissions, operational noise impacts, and public services.

It is expected that Alternative 4 would have a greater impact related to VMT, as the Alternative results in less residential density within a designated TPA. As such, under Alternative 4, impacts to VMT would be greater than the less than significant impact of the Project but would remain less than significant. In all other environmental areas analyzed above, Alternative 4 would result in similar impacts to the Project.

e. Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The State 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.

Alternative 1, the No Project Alternative would avoid the Project's significant and unavoidable environmental impacts related to the direct and cumulative Project impacts on historical resources. Alternative 1 would also reduce all of the Project's less than significant impacts to no impact. However, the No Project Alternative would not meet any of the Project's basic objectives.

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 Historic Preservation Alternative, would be the Environmentally Superior Alternative. Alternative 2 would reduce the Project's significant environmental impacts related to direct impacts to historic resources. Alternative 2 would also lessen many of the Project's already less than significant impacts including operational air quality, GHG, operational noise, and public services. However, Alternative 2 includes a twenty-one-story mixed-use building that is considerably taller than the surrounding development, and therefore, Alternative 2 would not meet the Project's objective of providing a development that complements the visual character of the area to the same degree as the Project.

Due to the fewer number of housing units, Alternative 2 would not meet the Project's objectives related to providing new market-rate and affordable housing, specifically it would not meet the objectives of developing an infill mixed-use project that provides new multi-family affordable housing in a diverse mixed-use urban environment near multiple transit opportunities and institutional uses, to the same extent as the Project. Similarly, Alternative 2 would not meet the goals and objectives of the City's Housing Element or contribute to the City's RHNA numbers to the same degree as the Project.

In addition, due to the smaller commercial area, Alternative 2 would not provide commercial uses that provide short- and long-term employment opportunities and sales tax revenue to the same degree as the Project. Therefore, Alternative 2 would fail to meet three of the Project's basic objectives to the extent of the Project.