

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. As described in Public Resources Code (PCR) Section 21001, 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 could avoid or substantially lessen such significant effects. Additionally, PCR Section 21002.1(a) states, in part, that the purpose of an environmental impact report (EIR) is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which significant effects can be mitigated or avoided.

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

An EIR shall describe a range of 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 the Project's alternatives are based primarily on the ability of that alternative to avoid or substantially lessen significant impacts of the Project, even if these alternatives would impede, to some degree, the attainment of the Project objectives or be more costly. The CEQA Guidelines further direct that the range of selected alternatives be guided by the "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, State CEQA Guidelines Section 15126.6(e) requires the analysis of a "no project" alternative and State 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 must be designated. If the environmentally superior

alternative is the No Project Alternative, then the EIR would be required to identify an environmentally superior alternative among the other alternatives.

2. Overview of Selected Alternatives

As indicated above, the intent of the Project alternatives is to avoid or substantially reduce significant impacts of a project while 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 a significant and unavoidable impact that cannot be mitigated with respect to direct Project and cumulative impacts on historic resources. In addition, potential impacts related to construction noise and vibration would require the imposition of mitigation measures for the Project, which would reduce those impacts to less than significant levels.

Specifically, by demolishing six existing buildings which are contributing resources to the Flower Drive Historic District, the Project would materially impair the physical characteristics of key character defining features that convey the Flower Drive Historic District's historical significance and justify its eligibility for listing in the California Register; therefore, the Project would result in a direct significant impact to the Flower Drive Historic District that cannot be mitigated.

Additionally, the mixed-use project located at 3900 South Figueroa Street (Related Project No. 6, also known as the Fig Project) was identified as a project which would result in cumulatively considerable impacts to the Flower Drive Historic District boundary. Taken together, the Project and the Fig Project would result in the loss of ten buildings within the district (eight contributing, two non-contributing). Within the Fig Project portion of the Flower Historic District, a total of five contributing buildings would remain within the Flower Drive block south of 39th Street: two contributing building would remain in place, one contributing building would be relocated from within the Historic District to a location adjacent to the two to remain, and two additional contributing buildings would be relocated outside the district boundaries to the immediate south of the historical district boundary along South Flower Drive. The Project's impacts would be cumulatively considerable when considered in conjunction with the impacts from Related Project No. 6, the Fig Project. Therefore, the cumulative impact to the Flower Drive Historic District would be significant with no mitigation available to reduce the impact to a less than significant level.

Accordingly, based on the significant environmental impacts of the Project, the basic objectives established for the Project (see Section II, Project Description of this Draft EIR), and the feasibility of the alternatives considered, the following alternatives to the Project were selected for evaluation.

- **Alternative 1: No Project Alternative:** Alternative 1 assumes that the Project would not be implemented, 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 seven two-story multi-family residential buildings that are part of the Flower Drive Historic District along South Flower Drive, and the 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 2: Historic Preservation Alternative:** Alternative 2 would preserve six multi-family residential buildings that are contributing resources to the Flower Drive Historic District on the Project Site and demolish one multi-family residential building that is a non-contributing resource on the Project Site to construct a new three-story multi-family residential building 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 (immediately outside the Flower Drive Historic District boundary).

Alternative 2 would result in the development of 137 residential units and 2,480 square feet of commercial space.

- **Alternative 3: 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, while preserving four contiguous contributing buildings. Two new four-story buildings would be constructed, one within the boundaries of the Flower Drive Historic District, and one immediately outside the boundaries. Alternative 3 would result in the development of 58 residential dwelling units, including 12 affordable units, and 2,160 square feet of ground floor commercial uses.
- **Alternative 4: Complies with Existing Zoning Alternative:** Alternative 4 would involve the demolition of six contributing buildings and one non-contributing building to the Flower Drive Historic District for the development of two buildings with a maximum height of three stories (45 feet in height), which would be 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. 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.

Table V-1 on page V-4 provides a comparison of the Project and the four 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 of Alternatives

| | Project | Alternative 1: No Project Alternative | Alternative 2 : Historic Preservation Alternative | Alternative 3: Partial Preservation Alternative | Alternative 4: Complies with Existing Zoning Alternative |
|--|------------------------|--|--|--|---|
| Existing Use to Remain | None | 8 multi-family residential buildings and surface parking | 6 multi-family residential buildings | 4 multi-family residential buildings | None |
| Overall FAR | 4.5:1 | 0.73:1* | 3.04:1* | 1.52:1* | 1.13:1 |
| Number of New Buildings | 1 | None | 2 | 2 | 2 |
| Affordable Housing | 42 du | None | 12 du | 12 du | None |
| Residential | 249,443 sf (209 du) | 51 du (existing) | 153,034 sf (137 du) | 62,734 sf (58 du) | 68,352 sf (68 du) |
| Commercial | 2,705 sf | 0 sf (existing) | 2,480 sf | 2,160 sf | 2,705 sf |
| Maximum Height | 7 stories (86 feet) | 2 stories (approximately 22 feet) (existing) | 21 stories (215 feet) | Four stories (56 feet) | Three stories (45 feet) |
| sf=square feet du = dwelling units FAR = floor area ratio * Includes all development within entire Project Site boundary (new and existing). Source: Kimley-Horn & Associates, 2026. | | | | | |

3. Alternatives Considered and Rejected as Infeasible

As stated in CEQA Guidelines 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 15126.6(c), an EIR should briefly describe the rationale for selecting the alternatives to be discussed as well as identify any alternatives that were considered for evaluation but rejected as infeasible and briefly provide the reasons for their rejection. Per the CEQA Guidelines, among the factors that may be used to eliminate an alternative from further consideration are the alternative's failure to meet most of the basic project objectives, its infeasibility, of the alternative's inability to avoid the significant and unavoidable environmental impacts. The alternatives considered but rejected as infeasible include the following:

- Full Preservation/Commercial Development Only Alternative.** This alternative would consist of the development of only commercial uses and no housing on the portion of the Project Site zoned as C2, and no further development on the portion of the Project Site zoned as R1.5. While this alternative would avoid the significant and unavoidable historic impact created by the Project, it would not be consistent with key objectives of the Project which aim to develop an infill mixed-use project that maximizes the available residential density on the site with a mix of market-rate and

affordable multi-family housing near existing public transit facilities and institutional facilities and; developing dense, multi-family housing to support the goals of the City's Housing Element and the City's Regional Housing Needs Assessment. As such, this alternative was considered but rejected from further consideration.

- **Alternative Location Alternative.** This alternative would include the development of the Project at a different location. This Alternative was rejected as infeasible because it is not expected, and would be speculative, that the Applicant can reasonably acquire, control, or have access to a suitable alternative site that would provide for the uses and square footage proposed by the Project. Additionally, development of the Project on an alternative site could potentially produce other environmental impacts that would otherwise not occur on this Project Site and could result in greater environmental impacts when compared to this Project. Thus, in accordance with CEQA Guidelines Section 15126.6(f), this alternative was rejected from further consideration.

4. Alternatives Analysis Format

In accordance with State CEQA Guidelines 15126.6(c), each alternative should be evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding environmental impacts of the Project. Each alternative is also evaluated to determine whether the Project's basic objectives, as identified in Section II, Project Description, of this Draft EIR, would be substantially met by the alternatives, as described in State CEQA Guidelines 15126.6(c). The evaluation of each alternative follows the process described below:

- a. The net environmental impacts of the alternative are determined for each of the environmental issues areas analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of the Draft EIR unless otherwise specified.
- b. Post-mitigation significant and non-significant environmental impacts of each alternative and the Project are compared for each of the environmental issue areas as described below:
 - **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 would be described as "less."
 - **Greater.** Where the net impacts of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact would be described as "greater."
 - **Similar.** Where the impact of the alternative and the Project would be roughly equivalent, the comparative analysis would be described as "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 below in Table V-2 below.

Table V-2: Comparison of Impacts Associated with the Alternatives and Impacts of the Project

| Impact Area | Project | Alternative 1: No Project Alternative | Alternative 2: Historic Preservation Alternative | Alternative 3: Partial Preservation Alternative | Alternative 4: Complies with Existing Zoning Alternative |
|--|-----------------------------|---------------------------------------|--|---|--|
| A. Air Quality | | | | | |
| <i>Plan Consistency</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| <i>Regional and Localized Air Quality Impacts</i> | | | | | |
| <i>Construction</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| <i>Operation</i> | Less than significant | Less (No impact) | Less (Less than significant) | Less (Less than significant) | Less (Less than significant) |
| <i>Exposure of Sensitive Receptors</i> | | | | | |
| <i>Construction</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| <i>Operation</i> | Less than significant | Less (No impact) | Less (Less than significant) | Less (Less than significant) | Less (Less than significant) |
| B. Cultural Resources | | | | | |
| <i>Historical Resources</i> | Significant and unavoidable | Less (No impact) | Less (Less than significant) | Less (Significant and unavoidable) | Similar (Significant and unavoidable) |
| <i>Archeological Resources</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| <i>Human Remains</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| C. Greenhouse Gas Emissions | | | | | |
| <i>Significant Generation of GHG/ Plan Consistency</i> | Less than significant | Less (No impact) | Less (Less than significant) | Less (Less than significant) | Less (Less than significant) |
| D. Land Use and Planning | | | | | |
| <i>Plan Conflict</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |

| Impact Area | Project | Alternative 1: No Project Alternative | Alternative 2: Historic Preservation Alternative | Alternative 3: Partial Preservation Alternative | Alternative 4: Complies with Existing Zoning Alternative |
|--|---------------------------------------|---------------------------------------|--|---|--|
| E. Noise | | | | | |
| <i>Substantial Temporary or Permanent Noise</i> | | | | | |
| <i>Construction</i> | Less than significant with mitigation | Less (No impact) | Similar (Less than significant with mitigation) | Similar (Less than significant with mitigation) | Similar (Less than significant with mitigation) |
| <i>Operation</i> | Less than significant | Less (No impact) | Less (Less than significant) | Less (Less than significant) | Less (Less than significant) |
| <i>Excessive Groundborne Noise and Vibration</i> | | | | | |
| <i>Construction</i> | Less than significant with mitigation | Less (No impact) | Similar (Less than significant with mitigation) | Similar (Less than significant with mitigation) | Similar (Less than significant with mitigation) |
| <i>Operation</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| F. Public Services | | | | | |
| <i>Police Protection</i> | Less than significant | Less (No impact) | Less (Less than significant) | Less (Less than significant) | Less (Less than significant) |
| <i>Fire Protection</i> | Less than significant | Less (No impact) | Less (Less than significant) | Less (Less than significant) | Less (Less than significant) |
| G. Transportation | | | | | |
| <i>Plan Consistency</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| <i>Vehicle Miles Traveled</i> | Less than significant | Less (No impact) | Greater (Less than significant) | Greater (Less than significant) | Greater (Less than significant) |
| <i>Emergency Access</i> | | | | | |
| <i>Construction</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| <i>Operation</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |
| H. Tribal Cultural Resources | | | | | |
| <i>Tribal Cultural Resources</i> | Less than significant | Less (No impact) | Similar (Less than significant) | Similar (Less than significant) | Similar (Less than significant) |

V. Alternatives

A. Alternative 1: No Project Alternative

1. Description of the 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. Existing development on the Project Site totals 51 residential units and 26,597 square feet of floor area.

a. Air Quality

(1) Consistency with Applicable Air Quality Plans

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. As no new development would occur, Alternative 1 would not have the potential to cause any inconsistencies with applicable air quality plans to the Project Site and would result in no impact. Thus, impacts related to inconsistencies with applicable air quality plans would be **less** under Alternative 2 than the less than significant impacts of the Project.

(2) Regional and Localized Air Quality Impacts

(a) *Construction*

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty equipment. Therefore, construction-related regional and localized air quality impacts would not occur. Thus, impacts related to regional and localized emissions during construction would be **less** under Alternative 1 than 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 generated by the existing uses on the Project Site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur. Thus, impacts related to regional and localized emissions during operation would be **less** under Alternative 1 than the less than significant impacts of the Project.

(3) Exposure of Sensitive Receptors

(a) *Construction*

Alternative 1 would not result in any development or construction activities on the Project Site. Therefore, Alternative 1 would not include construction activities that would generate short-term emissions of criteria air pollutants. Thus, impacts related to exposure of sensitive receptors to construction-related emissions would be **less** under Alternative 1 than the less than significant impacts of the Project.

(b) *Operation*

Alternative 1 would not result in any development or increased operations, and the uses on the Project Site would remain similar to existing conditions. Therefore, Alternative 1 would not introduce any change to operational emissions associated with area sources, energy sources, or mobile sources. Therefore, no operational air quality impacts associated with exposure of sensitive receptors to area source, energy source, or mobile source emissions would occur. Thus, impacts related to regional and localized emissions during operation would be **less** under Alternative 1 than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. Alternative 1 would not include demolition, grading, or other earthwork activities that would impact historical resources, specifically the contributing resources to the Flower Drive Historic District, on the Project Site. As discussed in Section IV.B, Cultural Resources, of this Draft EIR, by demolishing six contributing resources, the Project would materially impair the physical characteristics of key character defining features of the Flower Drive Historic District that convey its historical significance and justify its eligibility for listing in the California Register; therefore, the direct impact to the Flower Drive Historic District caused by the Project would be significant and unavoidable. Thus, impacts related to historical resources would be **less** under Alternative 1 than the significant and unavoidable impacts of the Project.

(2) Archeological Resources

As discussed above, Alternative 1 would include no demolition, grading, or excavation as the Project Site would remain generally the same as existing conditions. Therefore, there would

be no potential to inadvertently discover previously unknown archeological resources at the Project Site. Thus, impacts related to archaeological resources under Alternative 1 would be **less** than the less than significant impacts of the Project.

(3) Human Remains

As discussed above, Alternative 1 would include no demolition, grading, or excavation as the Project Site would remain generally the same as existing conditions. Therefore, there would be no potential to inadvertently discover previously unknown human remains at the Project Site. Thus, impacts related to the discovery of human remains under Alternative 1 would be **less** than the less than significant impacts of the Project.

c. Greenhouse Gas Emissions

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. Therefore, Alternative 1 would not develop new uses on the Project Site that would generate new greenhouse gas (GHG) emissions that would impact global climate change. As discussed in Section IV.C, Greenhouse Gas Emissions, of this Draft EIR, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs, and Project-specific impacts with regard to GHG emissions would be less than significant. As such, under Alternative 1, the Project would have no impact related to GHG emissions. As such, the impact under Alternative 1 would be **less** than the less than significant impacts of the Project.

d. Land Use and Planning

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would remain as they are under existing conditions. Therefore, Alternative 1 would not result in any changes to the physical or operational characteristics of the existing multi-family residential buildings or surface parking lot. As no change to the Project Site would occur, this Alternative would not result in any inconsistencies with existing land use plans and policies that are applicable to the Project, and impacts would be **less** than the less than significant impacts of the Project.

e. Noise

(1) Temporary or Permanent Noise

(a) Construction

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. Therefore, Alternative 1 would not include any new construction activities that could result in construction-related noise on- or off the Project Site. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant impacts related to construction noise with the implementation of the mitigation measures, including noise shielding and muffling, enclosure or screening of outdoor mechanical equipment, approved locations for construction staging areas, and temporary sound walls. As such, Alternative 1 would reduce the Project's less than significant impact related to

construction noise to no impact. Therefore, the impact under Alternative 1 would be **less** than those of the Project.

(b) Operation

Alternative 1 would not modify the existing uses on the Project Site or introduce new stationary or mobile noise sources to the Project Site or Project Vicinity. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant impacts related to operational noise. In addition, the Project would implement a project design feature that would further limit the times of use for outdoor amplified sound systems. As such, Alternative 1 would reduce the Project's less than significant impact related to operational noise to no impact. Therefore the impact under Alternative 1 would be **less** than those of the Project.

(2) Excessive Groundborne Noise and Vibration

(a) Construction

Alternative 1 does not include any construction activities or any changes to the uses on the Project Site, and therefore, would not have any impact related to groundborne vibration. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant groundborne noise and vibration construction impacts after the implementation of mitigation measures, which address temporary construction vibration impacts from heavy equipment during the limited phase of construction when such equipment is used. These mitigation measures include the preparation of a baseline survey and vibration control plan limiting certain construction equipment near residences, and a requirement for evaluation and repairs in the event of any damage to any non-historic or historic building. As such, Alternative 1 would reduce the Project's less than significant impact related to construction groundborne noise and vibration to no impact. As such, the impact under Alternative 1 would be **less** than those of the Project.

(b) Operation

Alternative 1 would not result in any new development or change to the uses on the Project Site. According to Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant impacts to groundborne noise and vibration associated with on-site and off-site sources during Project operation. As such, Alternative 1 would reduce the Project's less than significant operational groundborne noise and vibration impact to no impact. As such, the impact under Alternative 1 would be **less** than those of the Project.

f. Public Services

(1) Police Protection

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. Therefore, there would be no potential for the Alternative to exceed the capacity of existing police facilities or necessitate construction of additional police infrastructure. As discussed in Section IV.F.1, Public Services – Police Protection, the Project would have a less than significant impact on police protection services provided by the Los Angeles Police Department (LAPD), specifically the Southwest Community Police Station. As such, Alternative 1 would result in no impacts to police protection.

As such, the impact under Alternative 1 would be **less** than the less than significant impact of the Project.

(2) Fire Protection

As discussed above, Alternative 1 would not result in any new development, so there would be no potential for the Alternative to exceed the capacity of existing fire facilities or necessitate construction of additional fire protection infrastructure. As discussed in Section IV.F.2, Public Services – Fire Protection, the Project would have a less than significant impact on fire protection services provided by the Los Angeles Fire Department (LAFD). As such, Alternative 1 would result in no impacts to fire protection. As such, the impact under Alternative 1 would be **less** than the less than significant impact of the Project.

g. Transportation

(1) Plan Consistency

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. As discussed in Section IV.G, Transportation, of this Draft EIR, impacts related to conflicts with a program, plan, ordinance or policy addressing the circulation system were determined to be less than significant without mitigation. As such, Alternative 1 would reduce the Project's less than significant impacts related to transportation plan consistency to no impact. Thus, the impact under Alternative 1 would be **less** than the less than significant impact of the Project.

(2) Vehicle Miles Traveled

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. Therefore, no new vehicle trips would be generated under Alternative 1. As discussed in Section IV.G, Transportation, of this Draft EIR, impacts related to vehicle miles traveled (VMT) were determined to be less than significant without mitigation. As such, Alternative 1 would reduce the Project's less than significant impacts related to VMT to no impact. Thus, the impact under Alternative 1 would be **less** than the less than significant impact of the Project.

(3) Emergency Access

(a) Construction

Under Alternative 1, no development would occur, and there would be no construction activities on the Project Site which would generate vehicle trips associated with heavy-duty construction equipment, haul trucks, or construction worker vehicles. As discussed in Section IV.G, Transportation, of this Draft EIR, impacts related to emergency access during construction were determined to be less than significant without mitigation. As such, Alternative 1 would reduce the Project's less than significant impacts related to emergency access during construction to no impact. Thus, the impact under Alternative 1 would be **less** than the less than significant impact of the Project.

(b) *Operation*

Under Alternative 1, no development would occur, and no changes to the operation of the existing Project Site would occur. As discussed in Section IV.G, Transportation, of this Draft EIR, impacts related to operational emergency access were determined to be less than significant without mitigation. As such, Alternative 1 would reduce the Project's less than significant impacts related to emergency access during operation to no impact. Thus, the impact under Alternative 1 would be **less** than the less than significant impact of the Project.

h. Tribal Cultural Resources

Under Alternative 1, no development would occur, and the physical conditions of the Project Site would generally remain as they are under existing conditions. Therefore, Alternative 1 would not result in any construction activities that would have the potential to disturb existing but undiscovered tribal cultural resources. As discussed in Section IV.H, Tribal Cultural Resources, of this Draft EIR, impacts related to tribal cultural resources would be less than significant with incorporation of applicable regulatory requirements related to the inadvertent discovery of tribal cultural resources. As such, Alternative 1 would reduce the Project's less than significant impact related to tribal cultural resources to no impact. As such, under Alternative 1, the impact would be **less** than the less than significant impact of the Project.

2. Comparison of Impacts

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.

3. Relationship of the Alternative to Project Objectives

Under Alternative 1, the 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 not be demolished, and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project or any of the Project's basic objectives. Specifically, Alternative 1 would not:

- Develop an infill mixed-use project that maximizes the available residential density on the site with a mix of market-rate and affordable multi-family residential units near existing public transit facilities and institutional facilities;
- Develop dense, multi-family housing to support the goals of the City's Housing Element and the City's Regional Housing Needs Assessment by providing new market

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- rate and affordable housing in a variety of sizes for different household types and income levels;
- Promote local and regional economic growth by developing new commercial uses that provide short- and long-term employment opportunities and sales tax revenue in the City;
 - Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions;
 - Complement the visual character of the area and improve the pedestrian environment through a high level of architectural design, new trees and landscaping, and active ground floor commercial uses; and
 - Promote local, regional, and State land use and mobility objectives by intensifying development on an infill site located near jobs, retail, and entertainment and in proximity to transit and transportation infrastructure in order to reduce vehicle miles traveled (VMT) and encourage pedestrian and other non-vehicular modes of travel.

Overall, the No Project Alternative would not meet the Project's underlying purpose of creating new mixed-use infill development that would provide much needed affordable and market-rate housing; promote the use of transit; improve the visual character of the area and pedestrian environment; and reduce VMT and pollutant emissions and increase energy efficiency.

V. Alternatives

B. Alternative 2: Historic Preservation Alternative

1. Description of the 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; however, parking for the twenty-one-story mixed-use building would include one level of subterranean parking, and therefore the amount of excavation would be greater.

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.

2. Environmental Impacts

a. Air Quality

(1) Consistency with Applicable Air Quality Plans

Alternative 2 would include less demolition than the Project due to the retention of the six historic contributor buildings on the Project Site and a smaller construction footprint for new construction as the two new residential buildings would be developed on three parcels of the Project Site (one parcel with a non-contributing structure in the Historic District, and two parcels outside of the Historic District). However, parking for the twenty-one-story mixed-use building would include one level of subterranean parking, therefore the amount and depth of excavation

would be greater. As with the Project, Alternative 2 would be consistent with the applicable air quality plans. Alternative 2 would also serve to implement applicable policies of the City of Los Angeles pertaining to air quality. As such, Alternative 2 would result in less than significant impacts associated with applicable air quality plans. Thus, impacts related to inconsistencies with applicable air quality plans under Alternative 2 would be **similar** to the less than significant impacts of the Project.

(2) Regional and Localized Air Quality Impacts

(a) *Construction*

Under Alternative 2, the six existing historic contributor buildings would be rehabilitated, and the remainder of the Project Site would be demolished and developed with two new multi-family residential buildings. Alternative 2 would involve less demolition, grading, and excavation than the Project due to the retention of six of the existing buildings on the Project Site. As with the Project, construction of Alternative 2 would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. While the overall amount of building construction would be less than what is proposed under the Project, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Since maximum daily conditions are used for measuring the significance of impacts, regional impacts on these days would be similar to those of the Project and would be less than significant. As evaluated in Section IV.A, Air Quality, of this Draft EIR, localized emissions under the Project would not exceed the SCAQMD localized screening threshold during construction. Therefore, the emissions generated by Alternative 2 would similarly not exceed SCAQMD screening thresholds during construction. Thus, impacts associated with regional and localized construction emissions under Alternative 2 would be **similar** to the less than significant impacts of the Project.

(b) *Operation*

Alternative 2 would reduce the number of units as compared to the Project; therefore, the number of net new daily vehicle trips would be less than that anticipated under the Project (see also subsection (g), Transportation). Operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, as well as consumption of electricity and natural gas. Since the amount of vehicle emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 2 would be less than those of the Project. With the reduction of overall units, both area sources and stationary sources would generate less on-site operational air emissions when compared to the Project, even though the Project was found to have a less than significant impact associated with operational regional impacts. Therefore, impacts associated with regional air pollutant emissions during operation under Alternative 2 would be **less** than the less than significant impact of the Project.

Localized operational impacts are primarily determined by peak-hour intersection traffic volumes. As previously discussed, Alternative 2 would result in fewer net new trips than the Project. Additionally, as with the Project, Alternative 2 would not introduce any new major sources of air pollution within the Project Site. Therefore, Alternative 2 would be expected to result in less

than significant impacts to operational regional and localized emissions. Thus, impacts associated with regional and localized operational emissions under Alternative 2 would be **less** than the less than significant impacts of the Project.

(3) Exposure of Sensitive Receptors

(a) *Construction*

As with the Project, Alternative 2 would include construction activities that would generate short-term emissions of criteria air pollutants. As discussed in Section IV.A, Air Quality, of this Draft EIR, on-site construction activities would not expose sensitive receptors to substantial pollutant concentrations and impacts with regard to localized emissions would be less than significant, and impacts related to localized construction mobile-source CO emissions would also be considered less than significant. As with the Project, the greatest potential for TAC emissions during construction for Alternative 2 would be from diesel particulate emissions associated with heavy equipment operations. As discussed above, under Alternative 2, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar to the Project on days with maximum construction activities, and Project-related TAC impacts during construction would be less than significant. Therefore, impacts associated with exposure of sensitive receptors during construction would be **similar** to the less than significant impacts of the Project.

(b) *Operation*

Alternative 2 would result in fewer residential units than the Project, and thus fewer vehicle trips than the Project. As discussed in Section IV.A, Air Quality, of this Draft EIR, operation of the Project would not introduce any major new sources of air pollution within the Project Site. Similar to the Project, Alternative 2's on-site operational activities, including generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations, and would not include a land use that has the potential to significantly impact nearby sensitive receptors with TAC generation during the operational phase. Additionally, the proposed Project would not generate trips by heavy-duty diesel trucks, which are an emitter of diesel particulate matter (DPM), and impacts to sensitive receptors from substantial pollutant concentrations would be less than significant. As such, because Alternative 2 would reduce air pollutant emissions during operation due to the generation of fewer vehicle trips, impacts associated with exposure of sensitive receptors would be **less** than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

Alternative 2 would preserve six existing multi-family residential buildings on the Project Site that are contributing resources to the Flower Drive Historic District and demolish one residential building that is non-contributing resource to the Flower Drive Historic District (3809 Flower Drive). Thus, unlike the Project, Alternative 2 would not result in the demolition of historical resources on the Project Site. However, Alternative 2 would alter the Flower Drive Historic District's immediate surroundings by constructing a new three-story, multi-family residential building 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 immediately outside the Flower Drive Historic District boundary. The design for the new three-story multi-family residential building would comply with the Secretary of the Interior's Standards and the new twenty-one-story building would not substantially alter the Flower Drive Historic District such that its historical significance could potentially be materially impaired. Therefore, Alternative 2 would eliminate the Project's significant and unavoidable impacts to the Historic District. Thus, impacts associated with historical resources under Alternative 2 would be **less** than the significant and unavoidable impacts of the Project and would be less than significant.

(2) Archaeological Resources

Alternative 2 would include less demolition than what is proposed under the Project by only demolishing two of the existing buildings and retaining and rehabilitating the remaining six buildings on the Project Site. However, Alternative 2 would still include excavation and ground disturbance that would have the potential to uncover subsurface archaeological resources, similar to the Project.

Alternative 2 would include the same Project Design Features as the Project in the event that archeological resources are discovered during construction activities. Therefore, the impact to archeological resources would be less than significant under Alternative 2. As such, impacts to archaeological resources under Alternative 2 would be **similar** to the less than significant impacts of the Project.

(3) Human Remains

As discussed above, Alternative 2 would include less demolition than what is proposed under the Project by only demolishing two of the existing buildings and retaining and rehabilitating the remaining six buildings on the Project Site. However, Alternative 2 would still include excavation and ground disturbance that would have the potential to inadvertently uncover subsurface human remains, similar to the Project. Alternative 2 would be required to comply with the same regulatory requirements as the Project in the event that human remains are discovered during construction activities. Therefore, the impact related to the discovery of human remains would be less than significant under Alternative 2. As such, impacts to human remains under Alternative 2 would be **similar** to the less than significant impacts of the Project.

c. Greenhouse Gas Emissions

As with the air quality impacts, the GHG emissions from a development project are largely determined by the number of daily vehicle trips generated and the amount of energy consumed by the proposed land uses. As previously discussed, Alternative 2 would result in fewer residential units than the Project, thereby resulting in fewer vehicle trips and lesser consumption to energy when compared to the Project. Therefore, the amount of GHG emissions generated by Alternative 2 would be less than the Project. As with the Project, Alternative 2 would be required to comply with applicable regulations that serve to reduce GHG emissions, including but not limited to the CALGreen Code and the Los Angeles Green Building Code. Alternative 2 would also increase urban density in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle parking, which would reduce VMT and associated fuel usage

and GHG emissions. Therefore, Alternative 2 would be expected to be consistent with the GHG reduction goals and objectives adopted under state, regional, and local regulatory plans. As such, impacts related to the GHG emissions under Alternative 2 would be **less** than the less than significant, impacts of the Project.

d. Land Use and Planning

As with the Project, Alternative 2 includes residential and commercial uses, however, Alternative 2 would result in a greater building height, greater square footage of commercial uses, and fewer residential units. Alternative 2 would include fewer housing units, including affordable housing units, than the Project. Therefore, Alternative 2 would not maximize housing production to meet the City's Regional Housing Needs Allocation (RHNA) to the same extent as the Project. As such, impacts associated with land use compatibility would be **similar** to the less than significant impacts of the Project.

e. Noise

(1) Temporary or Permanent Noise

(a) Construction

As previously discussed, the types of construction activities under Alternative 2 would be substantially similar to the Project, although the duration of construction and the amount of new building construction would be reduced compared to the Project. Regarding on-site construction noise, as with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment. Under Alternative 2, on- and off-site construction activities would require similar construction methods and similar heavy-duty equipment as the Project. As such, the associated construction noise would be expected to be similar when compared to the Project. Regarding off-site construction noise, as with the Project, Alternative 2 would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the construction. Additionally, it is expected that Alternative 2 would also be required to implement mitigation measures including noise shielding and muffling, enclosure or screening of outdoor mechanical equipment, approved locations for construction staging areas, and temporary sound walls that would decrease the impact from potentially significant to less than significant with mitigation incorporated, **similar** to those of the Project.

(b) Operation

Regarding operational noise, as with the Project, Alternative 2 would result in the generation of noise from mechanical equipment (e.g., HVAC, etc.), potential amplified music on the roof deck, parking and access noise, and trash/recycling truck pickup noise. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant impacts related to operational noise. In addition, Alternative 2 would also implement the proposed project design feature that would further limit the times of use for outdoor amplified sound systems. Alternative 2 would result in reduced vehicle trips when compared to the Project, resulting in less permanent noise impacts from operation. As such, Alternative 2 would result in less than significant impacts related to permanent noise impacts, and such impacts would also be **less** than those the Project.

(2) Excessive Groundborne Noise and Vibration

(a) Construction

Increases in groundborne vibration levels attributable to the Project would be primarily associated with short-term impacts from heavy equipment during the limited phase of construction when such equipment is used. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant groundbourne noise and vibration impacts after implementation of mitigation measures. As such, Alternative 2 would also be required to implement mitigation measures including the preparation of a baseline survey and vibration control plan, limitation of certain construction equipment near residences, and a requirement for evaluation and repairs in the event of any damage to any non-historic or historic building, a requirement for evaluation and repairs. As such, Alternative 2 would result in less than significant impacts with mitigation related to excessive groundborne noise and vibration from construction, **similar** to those of the Project.

(b) Operation

With respect to vibration-generating activities, operation of the Project would primarily involve personal automobiles used by employees, customers, and occasional loading and unloading. Due to the rapid drop-off rate of groundborne vibration and the short duration of the associated events, vehicular traffic-induced groundborne vibration is rarely perceptible beyond the roadway right-of-way and rarely results in vibration levels that cause damage to buildings in the vicinity. According to Section IV.E, Noise of this Draft EIR, the Project would result in less than significant impacts to groundbourne noise and vibration associated with on-site and off-site sources during Project operation. Since Alternative 2 would include similar operational uses as the Project, Alternative 2 would also be expected not to result in any significant effects relating to groundborne vibration or groundborne noise during operation. As such, Alternative 2 would result in less than significant impacts related to excessive operational groundborne noise and vibration, **similar** to those of the Project.

f. Public Services

(1) Police Protection

As with the Project, Alternative 2 would generate an additional residential population, as well as a new visitor and employee population on the Project Site which would contribute to an increase in demand for police protection services provided by LAPD, specifically the Southwest Community Police Station. However, as previously discussed, Alternative 2 would result in fewer residential units than the Project, and therefore, would result in less demand for police protection services than the Project. As with the Project, Alternative 2 would also implement the project design features related to police protection, including the implementation of temporary security measures, sufficient lighting, installation of crime prevention features, and submittal of a diagram copy of the Project Site to the Area Commanding Officer (ACO) for the Southwest Community Police Station. Alternative 2 would also implement the project design feature included in the Project, further discussed under subsection (g), Transportation, below, TRAF-PDF-1, which requires the preparation of a Construction Traffic Management Plan, which would assist in guiding emergency access to the Project Site, including police vehicles. Furthermore, Alternative 2 would

also generate revenues to the City's Municipal Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Therefore, the impact on police protection services would be less than significant under both the Project and Alternative 2, as neither would require the construction of new police facilities that would result in significant impacts. Thus, under Alternative 2, impacts to police protection would be **less** than the less than significant impacts of the Project.

(2) Fire Protection

As with the Project, Alternative 2 would generate an additional residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for fire protection services provided by LAFD. However, as discussed previously, Alternative 2 would result in fewer residential units than the Project, and therefore, less demand for fire protection services than the Project. As with the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Similar to the Project, Alternative 2 would implement all applicable LABC and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, like the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided to reduce the demand for LAFD facilities and equipment, and would not result in the need for construction of new fire service facilities. Therefore, under Alternative 2, overall impacts with regard to fire protection and facilities would be **less** than the less than significant impact of the Project.

g. Transportation

(1) Plan Consistency

Alternative 2 would result in less vehicle trips during operation due to the reduced number of residential units when compared to the Project, and would still be consistent with the applicable plans analyzed in Section IV.G, Transportation, of this Draft EIR (i.e., SCAG 2024-2050 RTP/SCS, Mobility Plan 2035, Plan for a Healthy Los Angeles, South Los Angeles Community Plan, Exposition/University Park Redevelopment Plan, LADOT Vision Zero). Alternative 2 would encourage pedestrian activity and reduce VMT, improve mobility and accessibility, and encourage transit use due to its proximity to public transit and design elements that support active transportation and electric vehicles (EVs). Therefore, Alternative 2 would result in less than significant impacts related to transportation plan consistency. Thus, under Alternative 2, impacts to transportation plan consistency would be **similar** to the less than significant impact of the Project.

(2) Vehicle Miles Traveled

Section IV.G, Transportation, of this Draft EIR found that the Project would result in less than significant impacts related to VMT. VMT is calculated based on land use types and the

number of units and/or square feet related to those types of uses. 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.

(3) Emergency Access

(a) *Construction*

As discussed previously, construction of Alternative 2 would generate additional trips from heavy-duty construction equipment, haul trucks, and construction worker trips; however, the overall construction timeline would be shorter than the Project, and as such, Alternative 2 would result in less construction vehicle trips and construction worker trips than the Project. Similar to the Project, Alternative 2 would implement a Construction Traffic Management Plan that would assist in managing construction impacts to ensure adequate emergency access. Like the Project, all existing traffic lanes would remain open during the construction of Alternative 2 and some sidewalk closures would be required. Impacts to traffic, access, and parking during construction would be less than significant under Alternative 2. Therefore, under Alternative 2, construction-related impacts to emergency access would be **similar** to the less than significant impact of the Project.

(b) *Operation*

Like the Project, the operation of Alternative 2 would not impact emergency vehicle access. Alternative 2's access points and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, which includes emergency vehicle access. Compliance with applicable codes and regulations would be confirmed as part of the LAFD fire/life safety plan review and inspections for new construction projects as detailed in LAMC Section 57.118 prior to issuance of a building permit. Alternative 2 would not include any design features or barriers that could impede emergency vehicle access. Because Alternative 2 operations would not impact emergency vehicle access, operation impacts would be less than significant. Therefore, under Alternative 2, operation-related impacts to emergency access would be **similar** to the less than significant impact of the Project.

h. Tribal Cultural Resources

As with the Project, Alternative 2 would result in construction activities that have the potential to disturb existing but undiscovered tribal cultural resources. During the preparation of the Draft EIR, tribal consultation was completed for the Project. As discussed in Section IV.H, Tribal Cultural Resources, of this Draft EIR, impacts related to tribal cultural resources would be less than significant with adherence to applicable regulations associated with the inadvertent discovery of tribal cultural resources. Alternative 2 would be expected to also comply with the same applicable regulations to address potential impacts to tribal cultural resources. Therefore, Alternative 2 would result in less than significant impacts **similar** to the Project.

3. Comparison of Impacts

As discussed in the analysis above, 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. However, Alternative 2 would not maximize housing production to meet the City's Regional Housing Needs Allocation (RHNA) to the same extent as the Project and is less compatible with state housing mandates and objectives of the City's Housing Element. Additionally, given that Alternative 2 would include a reduced number of residential units in a 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.

4. Relationship of the Alternative to Project Objectives

Overall, Alternative 2 represents a reduced scope of development when compared to the Project; however, it would still provide new residential and commercial uses on site. Therefore, Alternative 2 would achieve most of the Project's underlying basic objectives, but to a lesser extent than the Project.

Alternative 2 would meet the following Project objectives:

- Promote local and regional economic growth by developing new commercial uses that provide short- and long-term employment opportunities and sales tax revenue in the City;
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions;
- Promote local, regional, and State land use and mobility objectives by intensifying development on an infill site located near jobs, retail, and entertainment and in proximity to transit and transportation infrastructure in order to reduce vehicle miles traveled (VMT) and encourage pedestrian and other non-vehicular modes of travel.

However, Alternative 2 would not meet the following Project objectives to the same extent as the Project:

- Complement the visual character of the area and improve the pedestrian environment through a high level of architectural design, new trees and landscaping, and active ground floor commercial uses;
- Develop an infill mixed-use project that maximizes the available residential density on the site with a mix of market-rate and affordable multi-family residential units near existing public transit facilities and institutional facilities; and

- Develop dense, multi-family housing to support the goals of the City's Housing Element and the City's Regional Housing Needs Assessment by providing new market rate and affordable housing in a variety of sizes for different household types and income levels.

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 infill mixed-use project that provides new student and multi-family affordable housing in a diverse mixed-use urban environment near multiple transit opportunities and the University of Southern California's campus, 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. While the Project would retain the existing low-profile historic structures on South Flower Drive, the inclusion of a twenty-one-story mixed-use building that is considerably taller than the surrounding development would not meet the Project's objective of providing a development that complements the visual character of the area.

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 not achieve the Project's basic objectives to the same extent as the Project.

V. Alternatives

C. Alternative 3: Partial Preservation Alternative

1. Description of the Alternative

The Partial Preservation Alternative (Alternative 3) would involve the demolition of three multi-family residential buildings on the Project Site, of which two are contributing resources to the Flower Drive Historic District (3801 – 3815 South Flower Drive), while preserving four contiguous multi-family residential buildings that are contributing resources to the Flower Drive Historic District (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.

2. Environmental Impacts

a. Air Quality

(1) Consistency with Applicable Air Quality Plans

Under Alternative 3, two contributing resources and one non-contributing resource to the Flower Drive Historic District would be demolished as compared to the six existing contributor buildings and one non-contributing building that would be demolished under the Project. However, the residential development proposed under Alternative 3 would be less dense than the Project by resulting in a reduction of 151 residential units for a total of 58 residential units. Alternative 3 would also result in a reduction in commercial square footage. As with the Project, Alternative 3 would be expected to be consistent with the applicable air quality plans as Alternative 3 would decrease the density and number of dwelling units compared to the Project. Alternative 3 would also serve to implement applicable policies of the City of Los Angeles pertaining to air quality. Thus, impacts related to inconsistencies with applicable air quality plans under Alternative 3 would be **similar** to the less than significant impacts of the Project.

(2) Regional and Localized Air Quality Impacts

(a) Construction

Alternative 3 would involve less demolition, grading, and excavation than the Project because it would demolish fewer existing units and fewer new housing units would be constructed. The construction timeline would be expected to be less under Alternative 3 because it includes the construction of smaller buildings with four stories rather than the seven stories proposed under

the Project. As with the Project, construction of Alternative 3 would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. While the overall timeline of building construction would be less than what is proposed under the Project, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring the significance of impacts, regional impacts on these days would be similar to those of the Project and would be less than significant. Additionally, due to the amount of grading and excavation needed to demolish the existing buildings and develop the new building on the Project Site, localized impacts would be similar to those of the Project, which would not exceed the SCAQMD localized screening threshold during construction. Therefore, the emissions generated by Alternative 3 would similarly not exceed SCAQMD screening thresholds during construction. Thus, impacts associated with regional and localized construction emissions under Alternative 3 would be **similar** to the less than significant impacts of the Project.

(b) Operation

Alternative 3 would reduce the number of residential units and density proposed by the Project; therefore, the number of net new daily vehicle trips would be less than that anticipated under the Project (see also subsection (g), Transportation). Operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, as well as consumption of electricity and natural gas. Since the amount of vehicle emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 3 would be less than those of the Project. With the reduction of overall units, both area sources and stationary sources would generate less on-site operational air emissions when compared to the Project, though the Project was found to have a less than significant impact associated with operational regional impacts. Therefore, impacts associated with regional air pollutant emissions during operation under Alternative 3 would be less than the less than significant impact of the Project.

Localized operational impacts are primarily determined by peak-hour intersection traffic volumes. As previously discussed, Alternative 3 would result in fewer net new trips than the Project. Additionally, as with the Project, Alternative 3 would not introduce any new major sources of air pollution within the Project Site. Therefore, Alternative 3 would be expected to result in less than significant impacts to operational regional and localized emissions. Thus, impacts associated with regional and localized operational emissions under Alternative 3 would be **less** than the less than significant impacts of the Project.

(3) Exposure of Sensitive Receptors

(a) Construction

As with the Project, Alternative 3 would include construction activities that would generate short-term emissions of criteria air pollutants. As discussed in Section IV.A, Air Quality, of this Draft EIR, on-site construction activities would not expose sensitive receptors to substantial pollutant concentrations and impacts with regard to localized emissions would be less than significant, and impacts related to localized construction mobile-source CO emissions would also be considered less than significant. As with the Project, the greatest potential for TAC emissions

during construction for Alternative 2 would be from diesel particulate emissions associated with heavy equipment operations. Project-related TAC impacts during construction would be less than significant. As discussed above, under Alternative 3, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar to the Project on days with maximum construction activities. Therefore, impacts associated with exposure of sensitive receptors during construction would be **similar** to the less than significant impacts of the Project.

(b) Operation

Alternative 3 would result in fewer residential units and an overall reduced density than the Project, and thus fewer vehicle trips than the Project. As discussed in Section IV.A, Air Quality, of this Draft EIR, operation of the Project would not introduce any major new sources of air pollution within the Project Site. Similar to the Project, Alternative 3's on-site operational activities, including generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations, and would not include a land use that has the potential to significantly impact nearby sensitive receptors with TAC generation during operational phase. Additionally, the proposed Project would not generate trips by heavy-duty diesel trucks, which are an emitter of diesel particulate matter (DPM), and impacts to sensitive receptors from substantial pollutant concentrations would be less than significant. As such, because Alternative 3 would reduce air pollutant emissions during operation due to the generation of fewer vehicle trips, impacts associated with exposure of sensitive receptors would be **less** than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

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. Thus, Alternative 3 would not eliminate the significant and unavoidable impacts to the Flower Drive Historic District that would result from demolition of contributing resources; however, due to the lower scale of proposed development and preservation of four contributing resources, the new construction would be more visually compatible with the remaining two-story contributors to the 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, although direct and cumulative impacts to historical resources under Alternative 3 would remain significant and unavoidable, they would be **less** than the Project.

(2) Archaeological Resources

Under Alternative 3, demolition and grading would be less than the Project but Alternative 3 would still include excavation and ground disturbance that would have the potential to uncover

subsurface archaeological resources, similar to the Project. Alternative 3 would include the same Project Design Features as the Project in the event that archeological resources are discovered during construction activities. Therefore, impacts associated with archeological resources under Alternative 3 would be **similar** to the less than significant impacts of the Project.

(3) Human Remains

As discussed above, Alternative 3 would have the same impact footprint as the Project, resulting in the same amount of demolition, grading, and excavation on the Project Site. As such, Alternative 3 would include excavation and ground disturbance that would have the potential to inadvertently uncover subsurface human remains, similar to the Project. Therefore, Alternative 3 would be required to comply with the same regulatory requirements as the Project in the event that human remains are discovered during construction activities. Therefore, impacts associated with the discovery of human remains under Alternative 3 would be **similar** to the less than significant impacts of the Project.

c. Greenhouse Gas Emissions

As with the air quality impacts, the GHG emissions from a development project are largely determined by the number of daily vehicle trips generated and the amount of energy consumed by the proposed land uses. As discussed previously, Alternative 3 would result in fewer residential units than the Project, thereby resulting in fewer vehicle trips and lesser consumption of energy as compared to the Project. Therefore, the amount of GHG emissions generated by Alternative 3 would be less than the Project. As with the Project, Alternative 3 would be required to comply with applicable regulations that serve to reduce GHG emissions, including but not limited to the CALGreen Code and the Los Angeles Green Building Code. Alternative 3 would also increase urban density in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle parking, which would reduce VMT and associated fuel usage and GHG emissions. Therefore, Alternative 3 would be expected to be consistent with the GHG reduction goals and objectives adopted under state, regional, and local regulatory plans. As such, impacts related to the GHG emissions under Alternative 3 would be **less** than the less than significant impacts of the Project.

d. Land Use and Planning

As with the Project, Alternative 3 includes residential and commercial uses, however, with Alternative 3, building density, height, and the number of dwelling units would be reduced. Although Alternative 3 would not support the goals and policies of the City's General Plan and South Los Angeles Community Plan which support the development of housing, including affordable housing, and commercial uses near transit and services to the same extent as the Project, impacts associated with land use compatibility would be **similar** to the less than significant impacts of the Project.

e. Noise

(1) Temporary or Permanent Noise

(a) *Construction*

As previously discussed, the types of construction activities under Alternative 3 would be substantially similar to the Project, although the duration of construction and the amount of new building construction would be reduced compared to the Project. Regarding on-site construction noise, as with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment. Under Alternative 3, on- and off-site construction activities and the associated construction noise would be expected to be similar to that of the Project during maximum activity days since the overall duration, construction methods, and heavy-duty equipment required would be similar under Alternative 3 when compared to the Project. Regarding off-site construction noise, as with the Project, Alternative 3 would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the Project Site during construction.

Additionally, it is expected that Alternative 3 would also be required to implement mitigation measures including noise shielding and muffling, enclosure or screening of outdoor mechanical equipment, approved locations for construction staging areas, and temporary sound walls that would reduce impacts regarding on-site and off-site construction noise to less than significant with mitigation incorporated, **similar** to those of the Project.

(b) *Operation*

Regarding operational noise, as with the Project, Alternative 3 would result in the generation of noise from mechanical equipment (e.g., HVAC, etc.), potential amplified music on the roof deck, parking and access noise, and trash/recycling truck pickup noise. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant impacts related to operational noise. In addition, Alternative 3 would also implement the proposed project design feature that would further limit the times of use for outdoor amplified sound systems. Alternative 3 would result in reduced vehicle trips when compared to the Project, resulting in less permanent noise impacts from operation. As such, impacts related to permanent noise impacts would be **less** than the less than significant impacts of the Project.

(2) Excessive Groundborne Noise and Vibration

(a) *Construction*

Alternative 3 would result in less demolition and grading compared to the Project. Increases in groundborne vibration levels attributable to Alternative 3 and the Project would be primarily associated with short-term construction impacts from heavy equipment during the limited phase of construction when such equipment is used. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant groundborne noise and vibration impacts after implementation of mitigation measures. As such, Alternative 3 would also be required to implement mitigation measures including the preparation of a baseline survey and vibration control plan, the limitation of certain construction equipment near residences, and in the event of any damage to any non-historic or historic building, a requirement for evaluation and

repairs. As such, Alternative 3 would result in less than significant impacts with mitigation related to excessive groundborne noise and vibration from construction with mitigation incorporated, **similar** to those of the Project.

(b) Operation

With respect to vibration-generating activities, operation of the Project would primarily involve personal automobiles used by employees, customers, and occasional loading and unloading. Due to the rapid drop-off rate of groundborne vibration and the short duration of the associated events, vehicular traffic-induced groundborne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. According to Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant impacts to groundborne noise and vibration associated with on-site and off-site sources during Project operation. Since Alternative 3 would include similar operational uses as the Project, Alternative 3 would also be expected not result in any significant effects relating to groundborne vibration or groundborne noise during operation. As such, Alternative 3 result in less than significant impacts related to excessive groundborne noise and vibration, **similar** to those of the Project.

f. Public Services

(1) Police Protection

As with the Project, Alternative 3 would generate an additional residential population, as well as a new visitor and employee population on the Project Site which would contribute to an increase in demand for police protection services provided by LAPD, specifically the Southwest Community Police Station. However, as previously discussed, Alternative 3 would result in fewer residential units than the Project, and therefore, would result in less demand for police protection services than the Project. As with the Project, Alternative 3 would also implement the project design features related to police protection and implement the project design feature included in the Project, further discussed under subsection(g), Transportation, below, TRAF-PDF-1, which requires preparation of a Construction Traffic Management Plan. Furthermore, Alternative 3 would generate revenues to the City's Municipal Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Therefore, under Alternative 3, the impact on police protection services would be less than significant as the Alternative would not require the construction of new police facilities resulting in significant environmental impacts. Thus, under Alternative 3 impacts to police protection would be **less** than the less than significant impact of the Project.

(2) Fire Protection

As with the Project, Alternative 3 would generate an additional residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for fire protection services provided by LAFD. However, as discussed previously, Alternative 3 would result in fewer residential units than the Project, and therefore, less demand for fire protection services than the Project. As with the Project, a Construction Traffic

Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Similar to the Project, Alternative 3 would implement all applicable LABC and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, like the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided to reduce the demand for LAFD facilities and equipment, and would not require the construction of new fire service facilities resulting in significant impacts. Therefore, under Alternative 3, overall impacts with regard to fire facilities under Alternative 3 would be less than significant, and would be **less** than the less than significant impact of the Project.

g. Transportation

(1) Consistency with Applicable Plans

Alternative 3 would result in fewer vehicle trips during operation due to the reduced number of residential units when compared to the Project, but would still be consistent with the applicable plans analyzed in Section IV.G, Transportation, of this Draft EIR (i.e., SCAG 2024-2050 RTP/SCS, Mobility Plan 2035, Plan for a Healthy Los Angeles, South Los Angeles Community Plan, Exposition/University Park Redevelopment Plan, LADOT Vision Zero). Alternative 3 would encourage pedestrian activity and reduce VMT, improve mobility and accessibility, and encourage transit use due to its proximity to public transit and design elements that support active transportation and EVs. Therefore, Alternative 3 would result in less than significant impacts related to transportation plan consistency. Thus, under Alternative 3, impacts to transportation plan consistency would be **similar** to the less than significant impact of the Project.

(2) Vehicle Miles Traveled

Section IV.G, Transportation, of this Draft EIR found that the Project would result in less than significant impacts related to VMT. VMT is calculated based on land use types and the number of units and/or square feet related to those types of uses. Given that Alternative 3 would include a reduced number of residential units and commercial square footage in a TPA, it is expected that Alternative 3 would have a greater impact related to VMT. As such, under Alternative 3, impacts to VMT would be **greater** than the less than significant impact of the Project but would still remain less than significant.

(3) Emergency Access

(a) Construction

As discussed previously, construction of Alternative 3 would generate additional trips from heavy-duty construction equipment, haul trucks, and construction worker trips; however, the overall construction timeline would be shorter than the Project, and as such, Alternative 3 would result in less construction vehicle trips and construction worker trips than the Project. Similar to the Project, Alternative 3 would implement a Construction Traffic Management Plan that would manage construction impacts to ensure adequate emergency access. Like the Project, all existing

traffic lanes would remain open during the construction of Alternative 3 and some sidewalk closures would be required. Impacts to traffic, access, and parking during construction would be less than significant under Alternative 3. Therefore, under Alternative 2, construction-related impacts to emergency access would be **similar** to the less than significant impact of the Project.

(b) Operation

Operation of Alternative 3 would not impact emergency vehicle access. Alternative 3's access points and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, which includes emergency vehicle access. Compliance with applicable codes and regulations would be confirmed as part of the LAFD fire/life safety plan review and inspections for new construction projects as detailed in LAMC Section 57.118 prior to issuance of a building permit. Alternative 3 would not include any design features or barriers that could impede emergency vehicle access. Because Alternative 3 operations would not impact emergency vehicle access, operation impacts would be less than significant. Thus, impacts related to emergency access during operation would be **similar** to the less than significant impact of the Project.

h. Tribal Cultural Resources

As with the Project, Alternative 3 would result in construction activities that have the potential to disturb existing but undiscovered tribal cultural resources. During the preparation of the Draft EIR, tribal consultation was completed for the Project. As discussed in Section IV.H, Tribal Cultural Resources, of this Draft EIR, impacts related to tribal cultural resources would be less than significant with compliance with regulatory requirements if tribal cultural resources are discovered during construction. As such, Alternative 3 would be expected to also implement regulations applicable to address potential impacts to tribal cultural resources. Therefore, Alternative 3 would result in less than significant impacts **similar** to the Project.

3. Comparison of Impacts

As discussed in the analysis above, 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 four 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 square footage, as well as the 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.

4. Relationship of the Alternative to Project Objectives

Overall, Alternative 3 represents a reduced scope of development when compared to the Project; however, it would still provide new residential uses and commercial uses on the Project Site. Therefore, Alternative 3 would achieve most of the Project's underlying basic objectives, but to a lesser extent than the Project. Alternative 3 would meet the following Project objectives:

- Promote local and regional economic growth by developing new commercial uses that provide short- and long-term employment opportunities and sales tax revenue in the City;
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions;
- Complement the visual character of the area and improve the pedestrian environment through a high level of architectural design, new trees and landscaping, and active ground floor commercial uses; and
- Promote local, regional, and State land use and mobility objectives by intensifying development on an infill site located near jobs, retail, and entertainment and in proximity to transit and transportation infrastructure in order to reduce vehicle miles traveled (VMT) and encourage pedestrian and other non-vehicular modes of travel.

However, Alternative 3 would not meet the following Project objectives to the same extent as the Project:

- Develop an infill mixed-use project that maximizes the available residential density on the site with a mix of market-rate and affordable multi-family residential units near existing public transit facilities and institutional facilities; and
- Develop dense, multi-family housing to support the goals of the City's Housing Element and the City's Regional Housing Needs Assessment by providing new market- rate and affordable housing in a variety of sizes for different household types and income levels.

Therefore, although Alternative 3 would assist with the revitalization of the Project Site, Alternative 3 would provide a reduced number of residential units as compared to the Project and would therefore not as fully support the Project objectives related to the provision of additional housing that is accessible to transit, commercial, entertainment, and educational uses to the same extent as the Project, and would also fail to maximize the density of the Project Site. Similarly, the reduction in the number of both affordable and market-rate units would not meet the demand for both housing types at the same level as the Project. Therefore, Alternative 3 would not achieve the Project's basic objectives to the same extent as the Project.

V. Alternatives

D. Alternative 4: Complies with Existing Zoning Alternative

1. Description of the 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 six feet, and a rear yard setback of 15 feet (assuming four stories of development). Development on the Figueroa Lots would have a front yard setback of 15 feet, side yard setbacks of six feet, and a rear yard setback of 15 feet. 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. This represents a reduction in 141 dwelling units compared to the Project. 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.

2. Environmental Impacts

a. Air Quality

(1) Consistency with Applicable Air Quality Plans

Under Alternative 4, the six existing historic contributor buildings on the Project Site would still be demolished. However, the residential development proposed under Alternative 4 would be less dense than the Project, resulting in 65 total residential units. The same square footage of commercial uses would be implemented as part of Alternative 4, and the impact footprint would be the same under both Alternative 4 and the Project. Therefore, Alternative 4 would include the same amount of demolition, grading, and excavation as the Project. As with the Project,

Alternative 4 would be expected to be consistent with the applicable air quality plans. Alternative 4 would also serve to implement applicable policies of the City of Los Angeles pertaining to air quality. Thus, impacts related to inconsistencies with applicable air quality plans under Alternative 4 would be **similar** to the less than significant impacts of the Project.

(2) Regional and Localized Air Quality Impacts

(a) *Construction*

Alternative 4 would involve the same amount of demolition, grading, and excavation as the Project because it would have the same impact footprint as the Project. However, the construction timeline would be expected to be less under Alternative 4 because it includes the construction of a smaller building with three stories rather than the seven stories proposed under the Project. As with the Project, construction of Alternative 4 would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. While the overall timeline of building construction would be less than what is proposed under the Project, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Since maximum daily conditions are used for measuring the significance of impacts, regional impacts on these days would be similar to those of the Project and would be less than significant. Additionally, due to the amount of grading and excavation needed to demolish the existing buildings and develop the new building on the Project Site, which would not exceed the SCAQMD localized screening threshold during construction. Therefore, the emissions generated by Alternative 4 would similarly not exceed SCAQMD screening thresholds during construction. Thus, impacts associated with regional and localized construction emissions under Alternative 4 would be **similar** to the less than significant impacts of the Project.

(b) *Operation*

Alternative 4 would reduce the number of residential units and density proposed by the Project; therefore, the number of net new daily vehicle trips would be less than that anticipated under the Project (see also subsection (g), Transportation). Operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, as well as consumption of electricity and natural gas. Since the amount of vehicle emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 4 would be less than those of the Project. With the reduction of overall units, both area sources and stationary sources would generate less on-site operational air emissions when compared to the Project, though the Project was found to have a less than significant impact associated with operational regional impacts. Therefore, impacts associated with regional air pollutant emissions during operation under Alternative 4 would be **less** than the less than significant impacts of the Project.

Localized operational impacts are primarily determined by peak-hour intersection traffic volumes. As previously discussed, Alternative 4 would result in fewer net new trips than the Project. Additionally, as with the Project, Alternative 4 would not introduce any new major sources of air pollution within the Project Site. Therefore, Alternative 4 would be expected to result in less than significant impacts to operational regional and localized emissions. Thus, impacts associated

with regional and localized operational emissions under Alternative 4 would be **less** than the less than significant impacts of the Project.

(3) Exposure of Sensitive Receptors

(a) *Construction*

As with the Project, Alternative 4 would include construction activities that would generate short-term emissions of criteria air pollutants. As discussed in Section IV.A, Air Quality, of this Draft EIR, on-site construction activities would not expose sensitive receptors to substantial pollutant concentrations and impacts with regard to localized emissions would be less than significant, and impacts related to localized construction mobile-source CO emissions would also be considered less than significant. As with the Project, the greatest potential for TAC emissions during construction for Alternative 4 would be from diesel particulate emissions associated with heavy equipment operations. Project-related TAC impacts during construction would be less than significant. As discussed above, under Alternative 4, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar to the Project on days with maximum construction activities. Therefore, impacts associated with exposure of sensitive receptors during construction would be **similar** to the less than significant impacts of the Project.

(b) *Operation*

Alternative 4 would result in fewer residential units and an overall reduced density than the Project, and thus fewer vehicle trips than the Project. As discussed in Section IV.A, Air Quality, of this Draft EIR, operation of the Project would not introduce any major new sources of air pollution within the Project Site. Similar to the Project, Alternative 3's on-site operational activities, including generation of criteria pollutants, would not expose sensitive receptors to substantial pollutant concentrations, and would not include a land use that has the potential to significantly impact nearby sensitive receptors with TAC generation during the proposed Project's operational phase. Additionally, the proposed Project would not generate trips by heavy-duty diesel trucks, which are an emitter of diesel particulate matter (DPM), and impacts to sensitive receptors from substantial pollutant concentrations would be less than significant. As such, because Alternative 4 would reduce air pollutant emissions during operation due to the generation of fewer vehicle trips, impacts associated with exposure to sensitive receptors would be **less** than the less than significant impacts of the Project.

b. Cultural Resources

(1) Historical Resources

Like the Project, Alternative 4 would involve the demolition of six contributing buildings and one non-contributing building to the Flower Drive Historic District on the Project Site, and a new three-story building would be constructed within the boundaries of the Flower Drive Historic District. Additionally, a second new three-story building would be constructed immediately outside of the Flower Drive Historic District at 3822-3828 Figueroa Street. Alternative 4 would not eliminate the significant and unavoidable impacts to the Flower Drive Historic District that result from demolition of contributing buildings; however, due to the lower scale of proposed development, the new construction would be more visually compatible with the remaining two-

story contributors to the Flower Drive Historic District. However, direct and cumulative impacts to historical resources under Alternative 4 would remain significant and unavoidable, and would be **similar** to the significant and unavoidable impacts of the Project.

(2) Archaeological Resources

Alternative 4 would have the same impact footprint as the Project, resulting in the same amount of demolition on the Project Site, although the overall construction timeline would be less due to the reduced density of the proposed building. As such, Alternative 4 would still include excavation and ground disturbance that would have the potential to inadvertently uncover subsurface archaeological resources, similar to the Project. Alternative 4 would include the same Project Design Features as the Project in the event that archeological resources are discovered during construction activities. Therefore, impacts associated with archeological resources under Alternative 4 would be **similar** to the less than significant impacts of the Project.

(3) Human Remains

As discussed above, Alternative 4 would include have the same impact footprint as the Project, resulting in the same amount of demolition on the Project Site, although the overall construction timeline would be less due to the reduced density of the proposed building. As such, Alternative 4 would include excavation and ground disturbance that would have the potential to inadvertently uncover subsurface human remains, similar to the Project. Therefore, Alternative 4 would be required to comply with the same regulatory requirements as the Project in the event that human remains are discovered during construction activities. Therefore, the impacts associated with the discovery of human remains under Alternative 4 would be **similar** to the less than significant impacts of the Project.

c. Greenhouse Gas Emissions

As with the air quality impacts, the GHG emissions from a development project are largely determined by the number of daily vehicle trips generated and the amount of energy consumed by the proposed land uses. As discussed previously, Alternative 4 would result in fewer residential units than the Project, thereby resulting in fewer vehicle trips and lower consumption of energy when compared to the Project. Therefore, the amount of GHG emissions generated by Alternative 4 would be less than the Project. As with the Project, Alternative 4 would be required to comply with applicable regulations that serve to reduce GHG emissions, including but not limited to the CALGreen Code and the Los Angeles Green Building Code. Alternative 2 would also increase urban density in proximity to transit, would include LAMC-required bicycle parking, and would include electric vehicle parking, which would reduce VMT and associated fuel usage and GHG emissions. Therefore, Alternative 4 would be expected to be consistent with the GHG reduction goals and objectives adopted under state, regional, and local regulatory plans. As such, impacts related to the GHG emissions under Alternative 4 would be **less** than the less than significant impacts of the Project.

d. Land Use and Planning

As with the Project, Alternative 4 includes residential and commercial uses, however, building density, height, and the number of dwelling units would be reduced under Alternative 4.

Although Alternative 3 would not support the goals and policies of the City's General Plan and the South Los Angeles Community Plan which support the development of housing, including affordable housing, and commercial uses near transit and services to the same extent as the Project, impacts associated with land use compatibility would be **similar** to the less than significant impacts of the Project.

e. Noise

(1) Temporary or Permanent Noise

(a) Construction

As previously discussed, the types of construction activities under Alternative 4 would be substantially similar to the Project, although the duration of construction and the amount of new building construction would be reduced compared to the Project. Regarding on-site construction noise, as with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment. Under Alternative 4, on- and off-site construction activities and the associated construction noise would be expected to be similar to that of the Project during maximum activity days since the overall duration, construction methods, and heavy-duty equipment required would be similar under Alternative 4 when compared to the Project. Regarding off-site construction noise, as with the Project, Alternative 4 would generate mobile-source noise from delivery/haul trucks and construction workers traveling to and from the Project Site during the construction. Additionally, it is expected that Alternative 3 would also be required to implement mitigation measures including noise shielding and muffling, enclosure or screening of outdoor mechanical equipment, approved locations for construction staging areas, and temporary sound walls that reduce impacts to. As such, impacts related to on-site and off-site construction noise would be less than significant with mitigation incorporated **similar** to those of the Project

(b) Operation

Regarding operational noise, as with the Project, Alternative 4 would result in the generation of noise from mechanical equipment (e.g., HVAC, etc.), potential amplified music on the roof deck, parking and access noise, and trash/recycling truck pickup noise. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant impacts related to operational noise. In addition, Alternative 4 would also implement the proposed project design feature that would further limit the times of use for outdoor amplified sound systems. Alternative 4 would result in reduced vehicle trips when compared to the Project, resulting in less permanent noise impacts from the operation of Alternative 4. As such, permanent noise impacts would be **less** than the less than significant impacts of the Project.

(2) Excessive Groundborne Noise and Vibration

(a) Construction

Alternative 4 would result in less demolition and grading compared to the Project. Increases in groundborne vibration levels attributable to Alternative 4 and the Project would be primarily associated with short-term construction impacts from heavy equipment during the limited

phase of construction when such equipment is used. As discussed in Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant groundborne noise and vibration impacts after implementation of mitigation measures.

As such, Alternative 4 would also be required to implement mitigation measures including the preparation of a baseline survey and vibration control plan, limitation of certain construction equipment near residences, and in the event of any damage to any non-historic or historic building, a requirement for evaluation and repairs. As such, Alternative 4 would result in less than significant impacts with mitigation related to excessive groundborne noise and vibration from construction, **similar** to those of the Project.

(b) Operation

With respect to vibration-generating activities, operation of the Project would primarily involve personal automobiles used by employees, customers, and occasional loading and unloading. Due to the rapid drop-off rate of groundborne vibration and the short duration of the associated events, vehicular traffic-induced groundborne vibration is rarely perceptible beyond the roadway right-of-way, and rarely results in vibration levels that cause damage to buildings in the vicinity. According to Section IV.E, Noise, of this Draft EIR, the Project would result in less than significant impacts to groundborne noise and vibration associated with on-site and off-site sources during Project operation. Since Alternative 4 would include similar operational uses as the Project, Alternative 4 would also be expected not result in any significant effects relating to groundborne vibration or groundborne noise during operation. As such, Alternative 4 would result in less than significant impacts related to excessive groundborne noise and vibration, **similar** to those of the Project.

f. Public Services

(1) Police Protection

As with the Project, Alternative 4 would generate an additional residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for police protection services provided by LAPD, specifically the Southwest Community Police Station. However, as previously discussed, Alternative 4 would result in fewer residential units than the Project, and therefore, would result in less demand for police protection services than the Project. As with the Project, Alternative 4 would also implement the project design features related to police protection and implement the project design feature included in the Project, further discussed under subsection(g), Transportation, below, TRAF-PDF-1 which requires the preparation of a Construction Traffic Management Plan that would assist in guiding emergency access to the Project Site. Furthermore, Alternative 4 would generate revenues to the City's Municipal Fund (in the form of property taxes, sales tax revenue, etc.) that could be applied toward the provision of new police facilities and related staffing in the community, as deemed appropriate. Therefore, under Alternative 4, the impact on police services would be less than significant, as it would not require the construction of new police facilities with associated significant impacts, but the impact to police facilities under Alternative 4 would be **less** than the less than significant impact of the Project.

(2) Fire Protection

As with the Project, Alternative 4 would generate an additional residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for fire protection services provided by LAFD. However, as discussed previously, Alternative 4 would result in fewer residential units than the Project, and therefore, less demand for fire protection services. However, as with the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Similar to the Project, Alternative 4 would implement all applicable LABC and Los Angeles Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, like the Project, compliance with applicable regulatory requirements, including LAFD's fire/life safety plan review and LAFD's fire/life safety inspection, would ensure that adequate fire prevention features would be provided to reduce the demand on LAFD facilities and equipment. Therefore, under Alternative 4, overall impacts with regard to LAFD fire protection would be less than significant, but would be **less** than the less than significant impact of the Project.

g. Transportation

(1) Consistency with Applicable Plans

Alternative 4 would result in fewer vehicle trips during operation due to the reduced number of residential units when compared to the Project, but would still be consistent with the applicable plans analyzed in Section IV.G, Transportation, of this Draft EIR (i.e., SCAG 2024-2050 RTP/SCS, Mobility Plan 2035, Plan for a Healthy Los Angeles, South Los Angeles Community Plan, Exposition/University Park Redevelopment Plan, LADOT Vision Zero), as Alternative 4 would still encourage pedestrian activity and reduce VMT, improve mobility and accessibility, and encourage transit use due to its proximity to public transit and design elements that support active transportation and EVs. Therefore, as with the Project, Alternative 4 would result in less than significant impacts related to transportation plan consistency. Thus, under Alternative 4, impacts would be **similar** to the less than significant impact of the Project.

(2) Vehicle Miles Traveled

Section IV.G, Transportation, of this Draft EIR found that the Project would result in less than significant impacts related to VMT. Given that Alternative 4 proposes reduced residential uses within the same development envelope as the Project which is located in a TPA, it would result in less vehicle trips than the Project and is also expected that Alternative 4 would result in greater impacts related to VMT. 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.

(3) Emergency Access

(a) Construction

As discussed previously, construction of Alternative 4 would generate additional trips from heavy-duty construction equipment, haul trucks, and construction worker trips; however, the

overall construction timeline would be shorter than the Project, and as such, Alternative 4 would result in less construction vehicle trips and construction worker trips than the Project. Similar to the Project, Alternative 4 would implement a Construction Traffic Management Plan that would manage construction impacts to ensure adequate emergency access. Like the Project, all existing traffic lanes would remain open during the construction of Alternative 4 and some sidewalk closures would be required. Impacts on traffic, access, and parking during construction would be less than significant under Alternative 4. As such, under Alternative 4 impacts to emergency access during construction would be **similar** to the less than significant impact of the Project.

(b) Operation

Like the Project, the operation of Alternative 4 would not impact emergency vehicle access. Alternative 4's access points and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding site access, which includes emergency vehicle access. Compliance with applicable codes and regulations would be confirmed as part of the LAFD fire/life safety plan review and inspections for new construction projects as detailed in LAMC Section 57.118 prior to issuance of a building permit. Alternative 4 would not include any design features or barriers that could impede emergency vehicle access. Because Alternative 4 operations would not impact emergency vehicle access, operation impacts would be less than significant. As such, under Alternative 4, impacts to emergency access during operation would be **similar** to the less than significant impact of the Project.

h. Tribal Cultural Resources

As with the Project, Alternative 4 would result in construction activities that have the potential to disturb existing but undiscovered tribal cultural resources. During the preparation of the Draft EIR, tribal consultation was completed for the Project. As discussed in Section IV.G, Tribal Cultural Resources, of this Draft EIR, impacts related to tribal cultural resources would be less than significant after compliance with applicable regulations related to the inadvertent discovery of the tribal cultural resources. As such, Alternative 4 would be expected to also comply with the same applicable regulations that address potential impacts to tribal cultural resources. Therefore, Alternative 4 would result in less than significant impacts, **similar** to the Project.

3. Comparison of Impacts

As discussed in the analysis above, 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 Boulevard 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.

Alternative 4 would not meet the goals and objectives of the City's Housing Element or contribute to the City's RHNA numbers, particularly with respect to the provision of new affordable

housing units, as none would be developed. It would also not meet the City's General Plan Land Use Element policies that support the development of housing, including affordable housing, near transit and services to the same extent as the Project. 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.

4. Relationship of the Alternative to Project Objectives

Overall, Alternative 4 represents a reduced scope of development when compared to the Project; however, it would still provide new residential uses and commercial uses on the Project Site. Therefore, Alternative 4 would achieve most of the Project's underlying basic objectives, but to a less extent than the Project. Alternative 4 would meet the following Project objectives:

- Promote local and regional economic growth by developing new commercial uses that provide short- and long-term employment opportunities and sales tax revenue in the City;
- Create a development with high quality design that supports environmental sustainability through energy efficiency, water conservation, and the reduction of greenhouse gas emissions;
- Complement the visual character of the area and improve the pedestrian environment through a high level of architectural design, new trees and landscaping, and active ground floor commercial uses; and
- Promote local, regional, and State land use and mobility objectives by intensifying development on an infill site located near jobs, retail, and entertainment and in proximity to transit and transportation infrastructure in order to reduce vehicle miles traveled (VMT) and encourage pedestrian and other non-vehicular modes of travel.

However, Alternative 4 would not meet the following Project objectives to the same extent as the Project:

- Develop an infill mixed-use project that maximizes the available residential density on the site with a mix of market-rate and affordable multi-family residential units near existing public transit facilities and institutional facilities; and
- Develop dense, multi-family housing to support the goals of the City's Housing Element and the City's Regional Housing Needs Assessment by providing new market-rate and affordable housing in a variety of sizes for different household types and income levels.

Therefore, although Alternative 4 would assist with the revitalization of the Project Site, it would provide a reduced number of residential units as compared to the Project, and would therefore not as fully support the Project objectives to the same extent as the Project, and would also fail to maximize the density of the Project Site. Similarly, the reduction in the number of both affordable and market-rate units would not meet demand for both housing types at the same

level as the Project. Therefore, Alternative 4 would not achieve the Project's basic objectives to the same extent as the Project.

V. Alternatives

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.

With respect to identifying an Environmentally Superior Alternative, among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1 - No Project Alternative; Alternative 2 - Historic Preservation Alternative; Alternative 3 – Partial Preservation Alternative; and Alternative 4 - Complies with Existing Zoning Alternative. Table V-1, Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project, 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 Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Of the alternatives analyzed in this Draft EIR, 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. As discussed above, 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.

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 same extent as the Project.