

I. Executive Summary

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the Our Lady of Mt. Lebanon Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project and proposed entitlements, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in CEQA Guidelines Sections 15123(a) and 15362, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

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

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

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for

public comment to the State Clearinghouse, Governor's Office of Planning and Research (OPR), responsible agencies, and other interested parties on August 9, 2019, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A to this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Cultural Resources
- Energy
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Land Use and Planning
- Noise
- Public Services (fire protection, police protection, and libraries)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (water supply/infrastructure and energy infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to: aesthetics; agriculture and forestry resources; air quality (odors); biological resources; cultural resources (archaeological resources and human remains); geology and soils; hydrology and water quality; hazards and hazardous materials (hazardous materials sites, airport hazards, emergency response plans, and wildland fires); land use and planning (division of an established community); mineral resources; population and housing; public services (schools and parks); recreation; utilities and service systems (telecommunications facilities, wastewater, and solid waste); and wildfires. Therefore, these areas were not analyzed further in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A.1 to this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. Executive Summary. This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, a summary of environmental impacts and mitigation measures, and a summary of alternatives.
- **II. Project Description.** This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.
- **III. Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related Projects anticipated to be built in the vicinity of the Project Site.
- IV. Environmental Impact Analysis. This section contains the environmental setting, Project and cumulative impact analyses, project design features, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: air quality; cultural resources; energy; greenhouse gas emissions; hazards and hazardous materials; land use and planning; noise; public services (fire protection, police protection, and libraries); transportation; tribal cultural resources; and utilities and service systems (water supply and infrastructure and energy infrastructure).
- V. Alternatives. This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; No Project/Development Alternatives; Reduced Density Alternative (30%); Modified Design Alternative; and Reduced Grading Alternative.
- VI. Other CEQA Considerations. This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.

- **VII. References.** This section lists the references and sources used in the preparation of this Draft EIR.
- **VIII. Acronyms and Abbreviations.** This section provides a list of acronyms and abbreviations used in this Draft EIR.
- IX. List of Preparers. This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

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

- Appendix A Initial Study, NOP, and NOP Comment Letters
 - Appendix A.1 Initial Study
 - Appendix A.2 Notice of Preparation
 - Appendix A.3 NOP Comment Letters and Scoping Meeting Comments
- Appendix B Air Quality and Greenhouse Gas Emissions
 - Appendix B.1 Air Quality and Greenhouse Gas Emissions Methodology
 - Appendix B.2 Air Quality Worksheet and Modeling Output Files
 - Appendix B.3 Greenhouse Gas Worksheets and Modeling Output Files
- Appendix C Historical Report
- Appendix D Archaeological Records Search
- Appendix E Energy Calculations
- Appendix F Energy Utility Report
- Appendix G Phase I ESA
- Appendix H Phase II ESA
- Appendix I Soil Characterization Report
- Appendix J Interim ACM-LBP Survey
- Appendix K Methane Report

- Appendix L Soil Management Plan
- Appendix M Supplemental ERM Survey
- Appendix N Land Use Tables
- Appendix O Noise Calculation Worksheets
- Appendix P Los Angeles Fire Department Letter
- Appendix Q Los Angeles Police Department Letter
- Appendix R Los Angeles Public Libraries Letter
- Appendix S Transportation Study
- Appendix T Transportation Addendum
- Appendix U TCR Report
- Appendix V Water Utility Report

4. Existing Project Site Conditions

The 42,285-square-foot (0.97-acre) Project Site is currently developed with the following improvements: a one-story, 6,848-square-foot cathedral; three ancillary church buildings with a total of 12,370 square feet of floor area, including a two-story, 2,520-square-foot rectory, a one-story, 5,426-square-foot social hall, and a three-story, 4,424-square-foot building with offices and meeting rooms; and a surface parking lot. The cathedral is situated on the eastern portion of the Project Site at the intersection of San Vicente Boulevard and Burton Way located southeast of the Project Site. The ancillary church buildings are located to the north and west of the cathedral, while the surface parking lot is located on the western portion of the Project Site. Access to the Project Site is currently available via two driveways along Burton Way and at various points along the publicly-accessible alley that abuts the Project Site to the north. Existing landscaping within the Project Site includes shrubs and six non-protected trees.¹

The Project Site is located within the planning boundary of the Wilshire Community Plan area. The Project Site has a General Plan land use designation of High Medium Residential and is zoned [Q]R4-1-O (Multiple Dwelling, Height District 1, Oil Drilling). The

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The Tree Resource, Tree Report for the Project Site, May 14, 2018. See Appendix IS-1 to the Project's Initial Study, which is included as Appendix A to this Draft EIR.

"Q" prefix indicates restrictions on the property as a result of a Zone Change to ensure compatibility with the surrounding properties. Pursuant to Ordinance No. 167711, the "Q" Conditions applicable to the Project Site include standards and limitations relating to setbacks, residential parking regulations, parking garage restrictions, landscaping and open space. The R4 designation indicates that the Project is located within a Multiple Dwelling Zone, which permits residential uses; churches; child care facilities or nursery schools; hotels, motels, and apartment hotels; fraternity or sorority hours and dormitories; schools or educational institutions; museums or libraries; accessory uses and home occupations; and retirement hotels. Height District 1, in conjunction with the R4 Zone, does not restrict building height or number of stories, but does limit the maximum floor area ratio (FAR) to 3:1. The "O" designation indicates the Project Site is located within an Oil Drilling District where the drilling of oil wells or the production from the wells of oil, gases, or other hydrocarbon substances is permitted.

Our Lady of Mt. Lebanon currently holds church services at the cathedral Monday through Friday at 8:00 A.M., on Saturday at 8:00 A.M., and on Sunday at 9:00 A.M. and 11:30 A.M. Prior to the COVID-19 pandemic, Our Lady of Mt. Lebanon's congregation included approximately 350 families, and the size of the congregation is not expected to increase following completion of the Project. The church offices house a three-person staff and are open Monday through Friday from 8:00 A.M. to 5:00 P.M. The church also holds meetings and classes in its meeting rooms and at the rectory approximately one to three times a week on Monday through Friday from 7:00 P.M. to 11:00 P.M. In addition, the church currently hosts 25 to 30 events each year, primarily in the social hall (which has a maximum capacity of approximately 230 people) for weddings, funerals and other church functions. Most of these events take place in the evening, but have occurred from 11:00 A.M. Currently, off-site parking is required at times for special masses and social hall events.

5. Description of the Proposed Project

a. Project Overview

The Project includes the development of new multi-family residential uses, and rehabilitation and limited alteration of the existing Our Lady of Mt. Lebanon–St. Peter Maronite Catholic Cathedral. Specifically, the Project includes the development of 153 residential units (including 17 units for Very Low Income households), the rehabilitated cathedral, and new ancillary church uses, including church offices, meeting rooms for use by the church, and a new multi-purpose room.

The proposed residential units would be provided in a new, 19-story residential building with a maximum height of 225 feet, while the new ancillary church uses would be located in a new, three-story church building with a height of approximately 42 feet. During

construction, the cathedral would be deconstructed and temporarily stored at an off-site location to allow excavation and construction activities for the proposed subterranean parking structure and the residential and church buildings. Upon completion of the proposed five-level subterranean parking structure and partial construction of the residential and church buildings, the cathedral building would be reassembled in its approximate original location (moved forward approximately two feet) and rehabilitated with limited alterations. During reassembly of the cathedral building, there would be limited modifications to create a more functional sanctuary and congregation seating area, including American with Disabilities Act (ADA)-compliant aisles and access ramps, additional accessible bathrooms, and an expanded cry room.² Following reassembly, two small additions would be appended to the rear (north) façade and the north end of the side (east) façade of the cathedral for an expanded chancel³ and ramp up to the chancel, respectively.

As part of the Project, three existing ancillary church structures, which include the parish rectory, church offices, and the social hall, would be demolished and replaced with the new church building that includes the replacement offices, meeting rooms and multi-purpose room. The development of the Project would also require the removal of six non-protected trees,⁴ including two fern pine trees, one olive tree, one cedar tree, one cypress tree, and one jacaranda tree. The Project includes the planting and retention of 53 trees.

As part of the residential component of the Project, approximately 16,800 square feet of open space would be provided, including 9,200 square feet of common open space and 7,600 square feet of private open space. Specifically, Level 4 of the building would include an indoor 676-square-foot fitness room and 1,266-square-foot recreation room; and an outdoor 5,242-square-foot recreation deck and a 2,016-square-foot pool deck. Outdoor open space amenities would also include barbecue stations, a spa, pool, firepit areas, built-in banquet seating, and informal seating. Private open space amenities include four patios for the ground floor residences and 144 balconies throughout the residences on all other levels of the residential building

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A cry room is a space designed for people to take infants and/or small children for privacy and/or to reduce the disturbance of others.

³ A chancel is the part of a church near the altar, reserved for the clergy and choir, and typically separated from the nave by steps or a screen.

Section 17.05.R of the LAMC (Protected Tree Regulations) regulates the relocation or removal of all Southern California native oak trees (excluding scrub oak), California black walnut trees, Western sycamore trees, and California Bay trees of at least 4 inches in diameter at breast height. These tree species are defined therein as "protected."

The Project includes a total of 397 vehicle parking spaces, including 252 residential parking spaces and 145 church parking spaces. Vehicular access to the five-level subterranean parking structure would be provided by a driveway along a publicly-accessible alley that abuts the Project Site to the north. The alley would also provide access for freight vehicles to the loading area. In addition, there would be passenger drop-off areas on Burton Way. Pedestrian access to the Project Site would be located along the perimeter of the Project Site. Specifically, pedestrian access to the cathedral would be along both San Vicente Boulevard and Burton Way. Access to the ancillary church building would be through the church courtyard, as well as church lobby on Burton Way. The residential building would be accessed through a residential lobby entrance along Burton Way. Primary pedestrian access to the proposed subterranean parking structure would be located at the northwest and northeast corners of the Project Site, accessible from the alley, Holt Avenue, and San Vicente Boulevard.

Construction of the Project would commence with demolition of the existing rectory building, social hall building and church office building, followed by the deconstruction of the cathedral building. This would be followed by excavation for the subterranean parking garage, construction of the subterranean parking structure and construction of the new residential and ancillary church buildings. Upon completion of the subterranean parking structure and the partial construction of the residential and ancillary church buildings, the cathedral would be reassembled at its approximate current location. Building construction would continue, followed by paving/concrete and landscape installation. It is anticipated that project construction would be completed in 2024. It is estimated that approximately 110,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase. The haul route from the Project Site is anticipated to include Burton Way, Robertson Boulevard, Wilshire Boulevard, La Cienega Boulevard, I-10, and South Vincent Avenue. Incoming haul trucks are anticipated to access the Project Site from South Vincent Avenue, I-10, Venice Boulevard, Cadillac Avenue, La Cienega Boulevard, Wilshire Boulevard, South San Vicente Boulevard, and Burton Way.

Overall, the Project would result in a net increase of approximately 160,862 square feet of new floor area on the Project Site. Upon completion of the Project, the total floor area of the Project Site would be approximately 180,080 square feet, with a maximum FAR of 4.99:1.

Following the completion of the Project, Our Lady of Mt. Lebanon would resume its current church service schedule and operation of the church offices and resume holding periodic meetings and classes in the ancillary church building. These activities are expected to continue at the same times and frequency as they currently do. In addition, the church would continue to hold 25 to 30 events each year, including weddings, funerals, fundraisers and other church events. These events would primarily take place in the

multi-purpose room, which would have a capacity of approximately 475 people. While the frequency of these events would remain the same, the size of some of these events would increase because the multi-purpose room would have a larger capacity than the existing social hall, which has a capacity of approximately 230 people. In addition, it is expected that six to eight community events unrelated to church activities would be held in the multi-purpose room each year.

b. Preservation and Rehabilitation of the Cathedral

The Project includes the deconstruction, temporary storage, reassembly, and rehabilitation of the cathedral building as part of the Project. The cathedral would be deconstructed and temporarily relocated to an off-site location to allow excavation, the construction of the subterranean parking structure and the partial construction of the new residential and ancillary church buildings. A complete analysis of the cathedral's eligibility as a historic resource is included in Section IV.B, Cultural Resources, of this Draft EIR.

During disassembly, the cathedral's roof structure, including painted/stenciled ceiling and trusses and purlins; exterior doors and frames; and original decorative features, including columns, trim, moldings, surrounds and precast concrete vent/grilles, would be photo-documented, numbered, and indexed so that the components can be reassembled in their exact original configuration and historic paint palette of the cathedral building would be restored, based on forensic evidence of original painted finishes. Non-original decorative wall finishes, such as the murals at the altar, would not be documented or replicated. New clay tile roofing would be installed and would match the historic roofing based on documentation (existing clay tile roof materials date to the 1990s and would not be salvaged). Exterior and interior original wood-frame walls and finishes would be discarded and reconstructed. Exterior stucco and interior plaster samples would be salvaged so that the stucco/plaster can be replicated to match the original in color, texture, and composition. The existing building systems, including mechanical units and ductwork, electrical panels and wiring, plumbing conduits and fixtures, would not be salvaged during disassembly. The cathedral would include all new code-compliant building systems as part of the reassembly process, as well as building-wide fire suppression systems and improved acoustical performance, including a full audio/visual system.

Upon completion of the subterranean parking and the partial construction of the residential and ancillary church buildings, the cathedral building would be reassembled in its approximate existing location (moved forward approximately two feet) and rehabilitated with limited alterations. The cathedral's original form, massing, roof pitch, fenestration pattern, and decorative cast stone features would be restored, as would its large open interior volume and general configuration of interior spaces.

Some modifications to the floor plan would be implemented during reassembly of the building in order to accommodate a more functional sanctuary and congregation seating area. These include ADA-compliant aisles and access ramps, additional accessible restrooms, and an expanded crying room. Specifically, each of the side aisles flanking the nave would be widened by 18 inches, and secondary spaces at the north and south ends of the building (crying room, restrooms, confessional/confessor rooms, and sacristies⁵) would be reconfigured. The overall length of the building would increase by approximately 8 feet toward the rear of the property to accommodate a larger entry vestibule and chancel. The nave, the most significant, intact primary interior space, would retain the same dimensions as it does currently, and its relationship to the entry vestibule, chancel, side aisles, and secondary spaces would not change.

Upon reassembly, two additions would be appended to the rear (north) façade and the north end of the side (east) façade of the cathedral building to accommodate an expanded chancel and ramp up to the chancel, respectively. The proposed additions would be modest in size, simple in design, and constructed of similar materials (stucco cladding, clay tile roofing) as the historic cathedral building. The rear and side additions would serve as a visual transition between the historic building and the more contemporary, flat-roofed portions of the new development.

As part of its reassembly, the non-historic rounded bay additions currently present on either side of the main entrance volume would not be recreated. Rather, the original articulation of the primary façade would be restored—side wing walls would be set back from the primary entrance volume, as they were historically, and two windows (one circular and one rectangular), originally located on either side of the main entrance, would be reconstructed based on historic documentation. A small, non-historic side chapel at the west façade of the building would also be removed and the original configuration of that elevation would be restored. In addition, the historic exterior paint palette of the cathedral building would be restored, based on forensic evidence of original painted finishes. Also, the non-historic social hall would be removed as part of the Project, and a new courtyard will be constructed in its place along the south edge of the property, reestablishing historic views of the west elevation of the cathedral building from Burton Way.

c. Requested Permits and Approvals

The list below includes the anticipated approvals and permits required for the Project. This Draft EIR analyzes the impacts associated with the Project and provides environmental review sufficient for all necessary entitlements, permits, approvals, and

⁵ A sacristy is a room for keeping vestments and other church furnishings, sacred vessels, and parish records.

public agency actions associated with the Project. The discretionary entitlements, permits, and approvals requested for the Project include, but are not necessarily limited to, the following:

- Pursuant to LAMC Section 12.22 A.25 Affordable Housing Incentives—Density Bonus, a 35-percent increase in density, in exchange for setting aside 15 percent of the permitted base density for the Project Site for Very Low Income restricted affordable households; and parking consistent with LAMC Section 12.22 A.25(d)(1) (Affordable Housing Reduced Parking Option 1) for all residential units.
- Pursuant to LAMC Section 12.22 A.25(e)(1), Affordable Housing On-Menu Incentives as follows:
 - Pursuant to LAMC Section 12.22 A.25(f)(4)(i), an On-Menu incentive to allow a 35-percent increase in allowable Floor Area Ratio (FAR) equal to the percentage of Density Bonus, which increases the maximum allowable FAR from 3:1 to 4.05:1;
 - Pursuant to LAMC Section 12.22 A.25(f)(7), an On-Menu incentive to include the area of any land required to be dedicated for street or alley purposes as lot area for calculating the maximum density permitted by the underlying zone in which the Project is located; and
 - Pursuant to LAMC Section 12.22 A.25(f)(1), an On-Menu incentive to allow a 12-foot 10-inch westerly side yard setback, in lieu of the otherwise required 16-foot side yard setback per LAMC Section 12.11 C.2.
- Pursuant to LAMC 12.22 A.25(g)(3)(ii), and California Government Code Section 65915(e)(1), requests for Affordable Housing Off-Menu Waivers of Development Standards as follows:
 - A Waiver of Development Standard to allow an additional increase in FAR from 4.05:1 to 4.99:1, resulting in 180,080 square feet of total floor area;
 - A Waiver of Development Standard to allow a variable width of 0–16 feet for the easterly side yard setback, in lieu of the otherwise required 16-foot side setback per LAMC Section 12.11 C.2;
 - A Waiver of Development Standard to allow a reduction of the common usable open space landscaping requirements to 23 percent on the Level 4 Recreation Deck Area and 10 percent on the Level 4 Pool Deck area, in lieu of the otherwise required 50 percent per Ordinance No. 167711, "Q" Condition No. 6.B; and
 - A Waiver of Development Standard to allow 37 trees to be planted within the common usable open space areas, in lieu of the otherwise required 51 trees

in the common usable open space area per Ordinance No. 167711, "Q" Condition No. 6.B, and to have the remaining balance of trees, or 14 trees, outside of common usable open space areas throughout the entire property (including the 10 street trees); and

- A Waiver of Development Standard to allow non-building structures and improvements, including, without limitation, hardscape, stairs, walkways, gates, and fences and guard railing that exceed 42 inches in height, within 5 feet from the property line along W. Burton Way, as otherwise prohibited per Ordinance No. 77072 (Building Line), Section 1.
- Pursuant to LAMC Section 12.24 X.7, a Zoning Administrator's Determination to allow a fence up to 8 feet in height within the front yard setback area located along the W. Burton Way frontage.
- Pursuant to LAMC Section 16.05, approval of Site Plan Review for a development project that includes 50 or more dwelling units.
- Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map (VTT-82229) to subdivide the property into one master lot and five (5) airspace lots; and a haul route for the export of up to 110,000 cubic yards of export material.
- Other discretionary and ministerial permits and approvals that are or may be required, including, but not limited to, extended construction hours for mat pour, temporary street closure permits, grading permits, excavation permits, foundation permits, building permits, and sign permits.

6. Areas of Controversy

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant and unavoidable impact has been identified. In addition, issues raised during the public scoping meeting and NOP comment period include aesthetics, pedestrian access, parking, historical impacts, alley operations, noise, air quality, subsidence, traffic, economic impacts, emergency access, church operations, public services, construction impacts, energy infrastructure, hydrology, tree removal, and cumulative impacts.⁶ With the exception of parking and economic impacts which are not impacts under CEQA, all of these issues were evaluated in this Draft EIR or the Initial Study prepared for the Project and included as Appendix A.1 to this Draft EIR. Based on the analysis provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant Project-level and cumulative impacts that cannot be feasibly mitigated

NOP Comment Letters and Scoping Meeting Comments are included in Appendix A.3 to this Draft EIR.

with respect to on-site and off-site noise during construction, on-site and off-site vibration during construction (pursuant to the threshold for human annoyance), and operational noise associated with the loading docks. In addition, as evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, cumulative noise impacts from on-site and off-site noise during construction and off-site vibration during construction (pursuant to the threshold for human annoyance) would be significant and unavoidable.

7. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, OPR, responsible agencies, and other interested parties on August 9, 2019, for a 30-day review period. The City also carried out a public scoping meeting for the Project on August 22, 2019. The Initial Study, NOP, NOP comment letters, and scoping meeting comments are included in Appendix A.3 to this Draft EIR.

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

8. Summary of Environmental Impacts

Table I-1 on page I-14 summarizes the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant Project-level impacts that cannot be feasibly mitigated with respect to on-site and off-site noise during construction, on-site and off-site vibration during construction (pursuant to the threshold for human annoyance), and operational noise associated with the loading docks. The Project would also result in cumulative impacts that cannot be feasibly mitigated with respect to on-site and off-site noise during construction, operational noise associated with loading activities, and off-site vibration during construction (pursuant to the threshold for human annoyance). In addition, as evaluated in Section IV, Environmental Impact Analysis, of this Draft EIR, cumulative noise impacts from on-site and off-site noise during construction and off-site vibration during construction (pursuant to the threshold for human annoyance) would be significant and unavoidable.

Table I-1 Summary of Impacts Under the Project

Environmental Topic	Project Impact Determination
A. AIR QUALITY	
Regional and Localized Emissions	
Construction	Less Than Significant
Operation	Less Than Significant
Toxic Air Contaminants	
Construction	Less Than Significant
Operation	Less Than Significant
B. CULTURAL RESOURCES	
Historical Resources	Less Than Significant
C. ENERGY	
Wasteful, Inefficient, or Unnecessary Consumption of Energy Res	ources
Construction	Less Than Significant
Operation	Less Than Significant
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant
D. GREENHOUSE GAS EMISSIONS	
GHG Emissions	Less Than Significant
Conflict with GHG Reduction Plans/Policies/Regulations	Less Than Significant
E. HAZARDS AND HAZARDOUS MATERIALS	
Construction	Less Than Significant
Operation	Less Than Significant
F. LAND USE AND PLANNING	
Conflict with Land Use Plans	Less Than Significant
G. NOISE	
Construction	
On-Site Noise ^a	Significant and Unavoidable
Off-Site Noise ^a	Significant and Unavoidable
On-Site Vibration (Building Damage)	Less Than Significant
On-Site Vibration (Human Annoyance)	Significant Unavoidable
Off-Site Vibration (Building Damage)	Less Than Significant
Off-Site Vibration (Human Annoyance) ^a	Significant Unavoidable
Operation	
On-Site Noise ^a	Significant and Unavoidable
Off-Site Noise	Less Than Significant
Vibration	Less Than Significant

Table I-1 (Continued) Summary of Impacts Under the Project

Environmental Topic	Project Impact Determination
H. PUBLIC SERVICES	·
Fire Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Police Protection	
Construction	Less Than Significant
Operation	Less Than Significant
Libraries	•
Construction	Less Than Significant
Operation	Less Than Significant
I. TRANSPORTATION	
Conflict with Transportation Plans	Less Than Significant
Vehicle Miles Traveled	Less Than Significant with Mitigation
Hazardous Design Features or Incompatible Uses	Less Than Significant
Emergency Access	Less Than Significant
J. TRIBAL CULTURAL RESOURCES	
Tribal Cultural Resources	Less Than Significant
K. UTILITIES AND SERVICE SYSTEMS	
Water Supply and Infrastructure	
Construction	Less Than Significant
Operation	Less Than Significant
Energy Infrastructure	•
Construction	Less Than Significant
Operation	Less Than Significant

As discussed in Section IV.G, Noise, of this Draft EIR, cumulative on- and off-site noise impacts, cumulative off site vibration impacts with respect to human annoyance during Project construction, and cumulative operational noise associated with the loading dock would be significant and unavoidable.

Source: Eyestone Environmental, April 2021.

9. Project Design Features

a. Cultural Resources

Project Design Feature CUL-PDF-1: A Cathedral Deconstruction, Reassembly, and Rehabilitation Plan prepared by a qualified historic consultant will be submitted to the Department of City Planning. The plan will

address the deconstruction, temporary relocation, reassembly, and rehabilitation of the cathedral building. The plan will be supported by an analysis of the building's structure and architectural drawings.

b. Greenhouse Gas Emissions

- **Project Design Feature GHG-PDF-1:** The design of the new buildings shall incorporate the following sustainability features:
 - a. Use of Energy Star-labeled products and appliances.
 - b. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
 - c. Water-efficient plantings with drought-tolerant species;
 - d. Fenestration designed for solar orientation; and
 - e. Pedestrian- and bicycle-friendly design with short-term and longterm bicycle parking.
- **Project Design Feature GHG-PDF-2:** The Project shall prohibit the use of natural gas-fueled fireplaces in the proposed residential units.

c. Noise

- Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.
- Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment will be screened from off-site noise-sensitive receptors. The equipment screen will be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line of sight from the equipment to the off-site noise-sensitive receptors.
- **Project Design Feature NOI-PDF-3:** A 6-foot wall will be provided along the west and north side of the west loading dock and along the north side of the east loading dock to acoustically screen the loading dock from off-site noise-sensitive receptors.
- **Project Design Feature NOI-PDF-4:** Project construction will not include the use of driven (impact) pile systems.
- Project Design Feature NOI-PDF-5: Outdoor amplified sound systems, if any, will be designed so as not to exceed a maximum noise level of

75 dBA (L_{eq-1hr}) at a distance of 15 feet from the amplified speaker sound systems at the Level 1 exterior courtyard and at the Level 4 outdoor recreation and pool decks. A qualified noise consultant will provide written documentation that the design of the system complies with this maximum noise level.

d. Public Services—Police Protection

- Project Design Feature POL-PDF-1: During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.
- **Project Design Feature POL-PDF-2:** During operation, the Project will include a closed circuit camera system and keycard entry for the residential building and the residential parking areas.
- **Project Design Feature POL-PDF-3:** During operation, the Project will provide lighting of buildings and walkways to provide for pedestrian orientation and clearly identify a secure route between parking areas and points of entry into buildings.
- Project Design Feature POL-PDF-4: During operation, the Project will provide lighting of parking areas to maximize visibility and reduce areas of concealment.
- **Project Design Feature POL-PDF-5:** The Project will design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites.
- Project Design Feature POL-PDF-6: Upon completion of the Project and prior to the issuance of a certificate of occupancy, the Applicant will submit a diagram of the Project Site to the LAPD's Wilshire Service Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

e. Transportation

Project Design Feature TR-PDF-1: Prior to the start of construction, the Applicant will prepare a Construction Traffic Management Plan (CTM Plan) that will include a Worksite Traffic Control Plan (WTC Plan), which will be submitted to the Los Angeles Department of Transportation (LADOT) for review and approval. The WTC Plan consists of a set of plans and will identify the location of any temporary street parking or sidewalk closures; show traffic/bus detours, haul routes, and hours of operation; provide for the posting of signs advising transit riders and pedestrians of temporary sidewalk closures and providing alternative routes; provide for the installation of other construction-related warning signs;

and show access to abutting properties. In addition, the CTM Plan will include, but not be limited to, the following measures:

- Maintain access for land uses in the vicinity of the Project Site during construction.
- Schedule construction material deliveries during off-peak periods to the extent practical.
- Organize Project Site deliveries and the staging of all equipment and materials in the most efficient manner possible, to avoid an impact to the surrounding roadways.
- Coordinate truck activity and deliveries to minimize trucks waiting to unload or load at or adjacent to the Project Site, to the extent feasible, and impact roadway traffic.
- Control truck and vehicle access to the Project Site with a flagman.
- Implement the approved haul truck route program that specifies the construction truck routes to and from the Project Site.
- Limit sidewalk and lane closures to the extent practical, and avoid peak hours to the extent practical. Where such closures are necessary, the WTC Plan will identify the location of any temporary sidewalk or lane closures and identify all traffic control measures, signs, delineators, and work instructions to be implemented by the construction contractor through the duration of demolition and construction activity. The WTC Plan will specifically state that signs will be posted advising pedestrians of temporary sidewalk closures and provide an alternative route or routes (e.g., if the sidewalk on the west side of San Vicente Boulevard adjacent to the Project Site is temporarily closed, a sign or signs would direct pedestrians to use the sidewalk on the east side of San Vicente Boulevard as an alternative route).
- Parking for construction workers will be provided either on-site or at off-site, off-street locations.

10. Mitigation Measures

a. Noise

Mitigation Measure NOI-MM-1: Temporary and impermeable sound barriers shall be erected at the locations listed below. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

 Along the northern property line of the Project Site between the construction areas and the residential use across the alley

- (receptor location R1). The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of the residential use (receptor location R1).
- Along the western property line of the Project Site between the construction areas and residential use at the west side of Holt Avenue (receptor location R2). The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of receptor location R2.
- Along the southern property line of the Project Site between the construction areas and residential use on the south side of Burton Way (receptor location R3). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R3.

b. Transportation

- Mitigation Measure TR-MM-1: Applicant shall prepare a TDM program for the Project that shall include the following TDM strategies consistent with Table 2.2-2 of the July 2019 Transportation Assessment Guidelines: Unbundle Parking and Promotions and Marketing. Specific elements are as follows:
 - Unbundle Parking—At the time of initial opening of the development, least \$25.00 per month per parking space shall be charged for a residential unit, separate from the monthly cost to rent the residential unit.
 - Promotions and Marketing—Marketing and promotional tools shall be utilized for the Project to educate and inform residents about alternative transportation options and the effects of their travel choices. Rather than two-way communication tools or tools that would encourage an individual to consider a different mode of travel at the time the trip is taken (i.e., smartphone application, daily email, etc.), this strategy includes passive educational and promotional materials, such as posters, information boards, or a website with information that residents can choose to read at their own leisure.

11. Summary of Alternatives

This Draft EIR examined four alternatives to the Project in detail, which include the No Project/No Build Alternative, the No Project/Development Alternative, the Reduced Density Alternative (30%), the Modified Design Alternative, and the Reduced Grading Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a

comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the Project does not proceed. Pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the No Project analysis must discuss "what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." Section 15126.6(e)(3)(B) states further that "[i]f disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed," while "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained."

For purposes of this alternatives analysis, in the event the Project does not proceed, it is reasonably expected that either (1) no new development would occur on the Project Site, which is the "No Project/No Build Alternative" discussed in this Section, or (2) Our Lady of Mt. Lebanon would sell the Project Site to a developer, which would demolish all of the existing improvements, including the cathedral, and develop a residential project on the Project Site, which is the "No Project/Development Alternative" discussed in the following Section.

Under the No Project/No Build Alternative, which is also designated as "Alternative 1," the physical conditions of the Project Site would generally remain as they are today and the Project Site would continue to be developed with the following improvements: (1) a one-story, 6,848-square-foot cathedral; (2) three ancillary church buildings with a total of 12,370 square feet of floor area, including a two-story, 2,520-square-foot rectory; a one-story, 5,426-square-foot social hall; and a three-story, 4,424-square-foot building with offices and meeting rooms; and (3) a surface parking lot. No new construction would occur.

Alternative 1 would avoid the Project's significant and unavoidable impacts with respect to on-site and off-site noise during construction, on-site and off-site vibration during construction (pursuant to the threshold for human annoyance), and operational noise associated with the loading docks. Alternative 1 would also eliminate the Project's significant and unavoidable cumulative impacts with respect on-site and off-site noise during construction and off-site vibration during construction (pursuant to the threshold for human annoyance). The impacts associated with the other environmental topics would be less than those of the Project. Overall, Alternative 1 would be less impactful than the Project.

b. Alternative 2: No Project/Development Alternative

Under the No Project/Development Alternative, which is also designated as "Alternative 2," Our Lady of Mt. Lebanon would sell the Project Site and existing improvements to a developer. In this event, it is reasonable to assume that the buyer/developer would seek to demolish all of the existing improvements, including the cathedral building, and obtain approval of a different project on the Project Site. Without the need to preserve the existing cathedral, the developer would have greater flexibility in the design of a residential project that conforms with existing zoning, and the design and construction costs would be substantially reduced, because the developer would not have to (1) design the residential building around the cathedral building and new ancillary church space or (2) deconstruct, reassemble and rehabilitate the cathedral.

Therefore, the No Project Alternative/Alternative 2 is the demolition of all the existing facilities on the Project Site and the redevelopment of the Project Site with a residential project that includes the same number of residential units and approximately the same floor area as the residential component of the proposed Project (i.e., a 148,641-square-foot residential building with 153 dwelling units). Without church uses, one less level of subterranean parking would be required.

Alternative 2 would not avoid the Project's significant and unavoidable impacts with respect to on-site and off-site noise, off-site vibration (pursuant to the threshold for human annoyance) during construction, and operational noise associated with the loading docks, nor would it avoid the significant and unavoidable cumulative impacts with respect to on-site and off-site construction noise and off-site construction vibration (pursuant to the threshold for human annoyance). Alternative 2 would also result in a new significant and unavoidable impact with respect to historical resources. All other impacts would be less than or similar to those of the Project. Overall, Alternative 2 would be more impactful than the Project.

c. Alternative 3: Reduced Density Alternative

The Reduced Density Alternative, which is also designated as "Alternative 3," would involve the development of the Project Site with a 30-percent reduction in proposed uses and a 40-percent reduction in floor area. Under this Alternative, the proposed residential units would be reduced from 153 to 107 units, and the proposed ancillary church uses would be reduced from 23,649 square feet to 14,189 square feet. Given that the proposed number of residential units (107 units) is less than the base permitted density allowed on the Project Site without a density bonus (113 units), the Reduced Density Alternative would not be required to include any affordable housing units. Total floor area under Alternative 3 would be reduced from 180,080 square feet to approximately 108,048 square feet, and the residential building height would be reduced from 19 stories and 225 feet to 14 stories and

approximately 175 feet, while the ancillary church uses would be located in a three-story building that is 42 feet in height, similar to the Project.

Like the Project, Alternative 3 would include the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral building, and would incorporate the same building design, architectural elements, lighting and signage. Alternative 3 would reduce the proposed 16,800 square feet of open space to approximately 11,760 square feet consistent with the LAMC and would eliminate 77 parking spaces and one subterranean parking level, resulting in 320 parking spaces provided within four subterranean parking levels, in addition to a reduction of bicycle parking spaces from 124 spaces to 87 spaces. Similar to the Project, the number of parking spaces dedicated for church uses would exceed the number of code-required parking spaces to provide sufficient parking for holiday services and larger events in the multi-purpose room. Parking access would remain unchanged from the Project.

With the substantial reduction in the number of residential units, Alternative 3 would not include affordable housing units and the Applicant would not seek the Density Bonus and related On-Menu Incentives and Off-Menu Waivers of Development Standards associated with the Project. In their place, the requested entitlements would include the following: a Zone Change to allow: (1) a reduction of the common usable open space landscaping requirements to 23 percent on the Level 4 Recreation Deck Area and 10 percent on the Level 4 Pool Deck area, in lieu of the otherwise required 50 percent per Ordinance No. 167711, "Q" Condition No. 6.B; and (2) the removal of the Building Line established in Ordinance No. 77072; a Zoning Administrator's Adjustments to allow: (1) an increase the permitted density from 106 to 107 residential units; (2) an increase the maximum permitted floor area ratio (FAR) from 3:1 to 3.55:1, to allow 108,388 square feet in floor area in lieu of the otherwise permitted maximum of 128,388 square feet; (3) a 12-foot 10-inch westerly side yard setback, in lieu of the otherwise required 16-foot side yard setback per LAMC Section 12.11 C.2; and (4) a variable width of 0-16 feet for the easterly side yard setback in lieu of the otherwise required 16-foot side setback per LAMC Section 12.11 C.2; and a Zone Variance to allow parking to be reduced consistent with the parking that would otherwise be permitted under LAMC Section 12.22 A.25(d)(1) (Affordable Housing Reduced Parking Option 1) for all residential units;.

As with the Project, the three existing ancillary church structures, which include the parish rectory, church offices, and the social hall, would be demolished and replaced with the new church building that includes the replacement offices, meeting rooms and a multi-purpose room. With regard to construction activities, the Alternative 3 would require less grading/excavation than the Project since the number of subterranean parking levels would be reduced from five to four levels, therefore reducing the grading quantities and amount of soil that would be exported from the Project Site. Similarly, the overall construction duration under Alternative 3 would be reduced compared to the Project due to

the reduction in grading/excavation and the reduced size of the subterranean parking structure, the residential building, and the ancillary church building.

Alternative 3 would not avoid the Project's significant and unavoidable impacts with respect to on-site and off-site noise, off-site vibration (pursuant to the threshold for human annoyance) during construction, and operational noise associated with the loading docks, nor would it avoid the significant and unavoidable cumulative impacts with respect to on-site and off-site construction noise and off-site construction vibration (pursuant to the threshold for human annoyance). All other impacts would be less than or similar to those of the Project. Overall, Alternative 3 would be less impactful than the Project.

d. Alternative 4: Modified Design Alternative

The Modified Design Alternative, which is also designated as "Alternative 4," would involve the development of a 12-story, 142-foot-tall residential building, as compared to the proposed 19-story, 225-foot-tall residential building under the Project. Like the Project, the Alternative 4 would include 153 residential units, the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral building, and approximately 23,649 square feet of ancillary church uses, including offices, meeting rooms and a multi-purpose room. In this Alternative, the residential building would form an "L" shape along the lengths of the western and northern property lines, spreading the massing across the Project Site and rising abruptly behind the cathedral. The design, placement, and massing of the ancillary church building would be similar to the Project. The footprint for Alternative 4 would be the same as the footprint of the Project.

Alternative 4 would include 16,800 square feet of open space, consistent with the LAMC, and maintain the Project's 397 vehicle parking spaces within five subterranean parking levels, with access provided by a driveway along the publicly accessible alley that abuts the Project Site to the north. As with the Project, Alternative 4 would include 124 bicycle parking spaces and the same architectural elements, lighting and signage. This Alternative would require the same entitlements as the Project and also require the demolition of the three existing ancillary church structures, including the parish rectory, church offices, and the social hall, and their replacement with the new church building that would include the offices, meeting rooms and multi-purpose room.

Alternative 4 construction activities would include the same amount of grading, excavation and export as the Project since the building footprint and number of subterranean levels would remain the same, and the overall construction duration would be the same.

Alternative 4 would not avoid the Project's significant and unavoidable impacts with respect to on-site and off-site noise, off-site vibration (pursuant to the threshold for human annoyance) during construction, and operational noise associated with the loading docks, nor would it avoid the significant and unavoidable cumulative impacts with respect to on-site and off-site construction noise and off-site construction vibration (pursuant to the threshold for human annoyance). Alternative 4 would also result in a new significant and unavoidable impact with respect to historical resources. All other impacts would be similar to those of the Project. Overall, Alternative 4 would be more impactful than the Project.

e. Alternative 5: Reduced Grading Alternative

The Reduced Grading Alternative, which is also designated as "Alternative 5," would include the same components as the Project, but parking would be provided in two-and-ahalf subterranean levels and five above-grade levels, as compared to five subterranean levels for the Project.⁷ The addition of above-grade parking levels would increase the residential component of the Project from 19 stories and 225 feet in height to 26 stories and 287 feet in height. Due to design constraints associated with above-grade parking, the ancillary church space would be located above the parking levels and would no longer have immediate access to the rehabilitated cathedral. In addition, the multi-purpose room would be reduced in size from 12,600 square feet to approximately 9,286 square feet, and its maximum occupancy would decrease from 475 to 370. The multi-purpose room would be located on the 7th level of the podium. The above-grade parking levels, as well as the multi-purpose room and some of the church office space, would be located within an eight-level, 106-foot-tall podium. The residential building would be constructed over the podium at the same location as the Project. Total development under Alternative 5 would be approximately 176,766 square feet, as compared to the Project's 180,080 square feet of floor area.

Like the Project, Alternative 5 would include a residential building with 153 residential units, 16,800 square feet of open space, and the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral building. It would also include the same ancillary church uses consisting of offices, meeting rooms and the multi-purpose room, but the square footage would be reduced from 23,649 square feet to 20,335 square feet as a result of the smaller multi-purpose room. Alternative 5 would include 397 parking spaces and access to the two-and-a-half subterranean levels, which would provide the church parking, with access from the alley, while access to the five above-grade levels, which would provide the residential parking, would be provided from Holt Avenue.

⁷ The conversion of below-grade parking to above-grade parking results in more parking levels because the footprint of each above-grade parking level is smaller than the footprint of each below-grade parking level.

Like the Project, Alternative 5 would include 124 bicycle parking spaces and the same architectural elements, lighting, and signage, as well as the demolition of three existing ancillary church structures, including the parish rectory, church offices, and the social hall, which would be replaced with the new church building that would include the offices, meeting rooms and multi-purpose room. This Alternative would also require the same entitlements as the Project, except that an additional Off-Menu Incentive/Waiver of Development Standards would be required to deviate from a "Q" Condition that would otherwise prohibit above-grade parking that exceeds one level and 10 feet in height.

With regard to construction activities, Alternative 5 would require approximately half the grading/excavation of the Project since the number of subterranean parking levels would be reduced from five to two and a half. In addition, the reduction in the number of subterranean parking levels would reduce the amount of grading and soil export. Consequently, the overall construction duration under Alternative 5 would be incrementally reduced compared to the Project.

Alternative 5 would not avoid the Project's significant and unavoidable impacts with respect to on-site and off-site noise, off-site vibration (pursuant to the threshold for human annoyance) during construction, and operational noise associated with the loading docks, nor would it avoid the significant and unavoidable cumulative impacts with respect to on-site and off-site construction noise and off-site construction vibration (pursuant to the threshold for human annoyance). Alternative 5 would also result in a new significant and unavoidable impact with respect to historical resources. All other impacts would be less than or similar to those of the Project. Overall, Alternative 5 would be more impactful than the Project.

f. Environmentally Superior Alternative

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

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, the No Project/No Build Alternative; Alternative 2, the No Project/Development Alternative; Alternative 3, the Reduced Density Alternative; Alternative 4, the Modified Design Alternative; and Alternative 5, Reduced Grading Alternative. Table I-1 on page I-14 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed

description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1, the No Project/No Build Alternative, would avoid the Project's significant and unavoidable impacts with respect to on- and off-site construction noise, on- and off-site construction vibration (pursuant to the threshold for human annoyance), and operational noise. Alternative 1 would also eliminate the Project's significant and unavoidable cumulative impacts with respect to on- and off-site construction noise and off-site construction vibration (pursuant to the threshold for human annoyance). Alternative 1 would eliminate all of the Project's remaining less-than-significant and less-than-significant-with-mitigation impacts as no changes to the existing conditions would occur. However, Alternative 1 would not meet most of the Project objectives or the Project's underlying purpose to modernize existing facilities and introduce a residential use, while preserving the historic cathedral to allow for the fulfillment of the cathedral's mission now and in the future.

Alternative 2, the No Project/Development Alternative would not avoid the Project's significant and unavoidable impacts with respect to on- and off-site construction noise, off-site vibration (pursuant to the threshold for human annoyance) during construction, and operational noise associated with the loading docks, nor would it avoid the significant and unavoidable cumulative impacts with respect to on-site and off-site construction noise and off-site construction vibration (pursuant to the threshold for human annoyance). Alternative 2 would also result in a new significant and unavoidable impact with respect to historical resources. All other impacts would be less than or similar to those of the Project. Additionally, while Alternative 2 would meet the Project objectives related to housing, it would not meet the Project's underlying purpose to modernize existing facilities and introduce a residential use, while preserving the historic cathedral to allow for the fulfillment of the cathedral's mission now and in the future or any of the objectives related to church facilities and the cathedral since they would be demolished.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project/ Alternative (here, both Alternative 1—No Project/No Build Alternative and Alternative—No Project/Development Alternative), a comparative evaluation of Alternatives 3, 4, and 5 indicates that Alternative 3, the Reduced Density Alternative, would be the Environmentally Superior Alternative. As discussed above, Alternative 3 would not avoid the Project's significant and unavoidable environmental impacts related to on-site and off-site noise and off-site vibration (pursuant to the threshold for human annoyance) during construction, nor would it avoid the significant and unavoidable cumulative impacts with respect to on-site and off-site construction noise and off-site construction vibration (pursuant to the threshold for human

annoyance). However, Alternative 3 would reduce, although not avoid, many of the Project's less-than-significant impacts. In addition, unlike Alternatives 4 and 5, Alternative 3 would not result in significant and unavoidable impacts with respect to historical resources that cannot be mitigated.

Overall, as discussed above in Section V.B.4, Alternative 3 would only partially meet the Project's underlying purpose because the replacement church facilities would be reduced by 40 percent and would not meet, or would only partially meet, many of the Project's objectives, including the objectives to provide affordable housing. Therefore, Alternative 3 would not satisfy the underlying purpose and objectives of the Project to the same extent as the Project.