

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. Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such alternatives, individual projects may be approved in spite of one or more significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

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

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

The CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [...], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site....

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

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives is to reduce the significant impacts of a project. 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 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.

Accordingly, based on the Project’s significant environmental impacts, the objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the potential alternatives, the alternatives to the Project listed below were selected for evaluation. The rationale for selecting the range of alternatives was based on the likelihood of the alternatives being able to avoid or substantially lessen one or more of the identified significant impacts and to meet the underlying purpose of the Project to 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 1: No Project/No Build Alternative
- Alternative 2: No Project/Development Alternative

- Alternative 3: Reduced Density Alternative (30%)
- Alternative 4: Modified Design Alternative
- Alternative 5: Reduced Grading Alternative

A comparison of the Project with the five land use alternatives is provided below in Table V-1 on page V-8. Each of these alternatives is described 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 potential alternatives are also discussed below. on page

3. Alternatives Considered and Rejected as Infeasible

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

- **Alternative Project Site:** The Applicant already owns the Project Site, and its location is conducive to the development of a mixed-use project. The Project Site along the western edge of the Beverly Grove District, which is a neighborhood in the Mid-City West area of the City characterized by a mix of commercial and residential uses. The Project Site is also well-served by transit. Furthermore, the Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Given its urbanized location, if an alternative site in the Wilshire Community Plan area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with construction noise and on-site and off-site vibration due to construction would also occur. In addition, considering the mixes of uses in the Community Plan area, development of the Project at an alternative site could potentially produce other significant environmental impacts that would otherwise not occur at the Project Site, such as construction air quality impacts due to proximity to sensitive receptors, displacement of existing people or housing, and the relocation or expansion of utility infrastructure, and result in greater overall environmental impacts when compared with the Project. Therefore, an alternative site is not considered feasible as the Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid the Project's significant

impacts. Furthermore, an alternative Project Site would not include the preservation of the historic cathedral. For these reasons, this alternative was rejected from further consideration.

- **Alternative Addressing the Significant Unavoidable Construction-Related Noise and Vibration Impacts of the Project:** As discussed in Section IV.G, Noise, of this Draft EIR, the Project would result in short-term significant unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant unavoidable construction-related noise impacts related to on-site construction activities, as well as significant unavoidable vibration (human annoyance) impacts related to both on-site construction activities and off-site construction traffic. The following approaches were considered, but rejected as infeasible, to substantially reduce or avoid these impacts:
 - Approach (a)—Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project, was also evaluated. This approach was rejected for the following reasons:
 - Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). It is anticipated the number of on-site construction equipment and off-site construction trips would be reduced under this approach. Typically, a reduction of 50 percent in the number of construction equipment pieces or construction traffic (haul and delivery trucks) trips would reduce the construction-related noise levels by approximately 3 dBA (just perceptible).¹ For example, a 50 percent reduction in the construction trucks during the site grading phase, from 12 to 6 truck trips per hour, would reduce the Project-related truck noise along Burton Way, Holt Avenue, 3rd Street, La Cienega Boulevard, Cadillac Avenue, and San Vicente Boulevard to 54.2 dBA Leq, 59.8 dBA Leq, 58.6 dBA Leq, 61.4 dBA Leq, 60.6 dBA Leq, and 54.2 dBA Leq, respectively (a 3.0 dBA reduction as compared to the Project). However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks), the actual noise levels would only be reduced by 0.3 dBA, 1.5 dBA, 1.1 dBA, 1.1 dBA, 1.6 dBA and 0.7 dBA along Burton Way, Holt Avenue, 3rd Street, La Cienega Boulevard, Cadillac Avenue, and San

¹ The reference to 3 dBA here and in other parts of the discussion of the noise options considered does not have to do with how much construction noise levels need to be reduced to avoid significant impacts. Rather, it has to do with: (1) the minimum reduction required to be audible to the human ear; and (2) the fact that a lowering of the number of construction pieces and volume of construction traffic by 50 percent is required to result in an audible reduction in on- and off-site construction noise, respectively. Another words, reducing peak day construction activities by 50 percent would result in a barely audible reduction in construction noise.

Vicente Boulevard, respectively. In addition, a 50 percent reduction in construction trucks during the mat foundation phase (i.e., concrete trucks), from 44 to 22 truck trips per hour, would reduce the Project-related truck noise along Burton Way, Holt Avenue, 3rd Street, La Cienega Boulevard, Cadillac Avenue, and San Vicente Boulevard to 59.5 dBA Leq, 65.1 dBA Leq, 63.9 dBA Leq, 66.9 dBA Leq, 65.9 dBA Leq, and 59.5 dBA Leq, respectively (a 3.0 dBA reduction as compared to the Project). However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks), the noise increase due to construction-related trucks would only be reduced from 0.9 to 2.4 dBA (along the anticipated truck routes) and the noise increase would still exceed the 5 dBA significance threshold along Holt Avenue and Cadillac Avenue by 1.5 dBA and 1.9 dBA, respectively. Thus, as analyzed, even with a 50 percent reduction in the truck trips, the off-site construction noise plus ambient noise would result in a minimal reduction in noise (i.e., less than the 3 dBA perceptible level) and noise impacts would remain significant.

- The on-site construction vibration impacts (human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and the approach would utilize similar construction equipment (e.g., drill rig and large bulldozer). In addition, off-site construction noise and vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant, similar to the Project.
- Approach (b)—Central Location of Development: An approach where the proposed building is moved closer to the center of the Project Site (including, potentially a single tower in the center of the site), thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors, was reviewed and rejected for the following reasons:
 - This approach would be incompatible with the Project's objectives related to church operations and the preservation of the historic cathedral. Specifically, such a project design would materially impair the cathedral's historic integrity. Similar to Alternative 3, this approach would provide no meaningful transition between the proposed building and the cathedral. This approach would also result in significant separation between the cathedral and the ancillary church uses.
 - Construction noise levels can be reduced by providing and situating the proposed building in the center of the site to provide an additional buffer zone between the sensitive receptors and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling of distance. The construction noise levels associated with the building phases for the proposed building placed closer to the

center of the site would be lower than the Project. However, the noise level reduction, depending the setback from the property line, would be limited due the size of the Project Site (average 150 feet between the north and south property lines). In addition, noise levels during the site demolition, site preparation and grading would be similar to the Project, as construction activities for these phases would still be up to the property line, similar to the Project. As such, the on-site construction noise impacts under this approach would remain significant.

- Similar to the Project, the on-site construction vibration impacts (human annoyance) of this option would be significant as heavy construction equipment (e.g., drill rig and large bulldozer) used for the site grading would still operate near the property line and adjacent sensitive uses under this option. Also similar to the Project, the off-site construction vibration impacts (human annoyance) of this option due to heavy trucks traveling by sensitive receptors would be significant.
- Approach (c)—Significantly Reduced Development: An approach that would significantly reduce the amount of development that would occur under the Project, to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced, was also considered. However, due to the close proximity of the sensitive receptors (i.e., directly across from the Project Site) and a constrained Project Site that does not have the space to create a meaningful buffer zone, the construction of a significantly smaller project would not mitigate the on-site construction noise impacts of the Project, especially at the upper levels of the adjacent residential buildings. In addition, the on-site construction vibration impacts (human annoyance) associated with this option would still be significant since the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site. In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would be significant.

As discussed above, none of the above approaches would feasibly substantially reduce or avoid the significant and unavoidable impacts associated with on- and off-site construction noise or on- and off-site construction vibration. This is because the significant unavoidable construction-related noise and vibration impacts of the Project are heavily influenced by the close proximity of the Project Site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount, duration, and type of Project construction activities. Therefore, an alternative that includes one or more of these approaches would not substantially reduce or eliminate the significant noise and vibration impacts of the Project and thus no further consideration of these approaches in the EIR is required.

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.² The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:
 - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided below in Table V-1 on page V-8.

As evaluated in the Initial Study prepared for the Project included in Appendix A to this Draft EIR, the Project would not result in significant impacts related to the following aesthetics; agriculture and forest resources; biological resources; cultural resources (archaeological resources and human remains); geology and soils; hydrology and water

² *State of California, CEQA Guidelines Section 15126.6 (c).*

Table V-1
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

| Impact Area | Project | Alternative 1: No Project/ No Build Alternative | Alternative 2: No Project/ Development Alternative | Alternative 3: Reduced Density Alternative (30%) | Alternative 4: Modified Design Alternative | Alternative 5: Reduced Grading Alternative |
|---|-----------------------|--|---|---|---|---|
| A. AIR QUALITY | | | | | | |
| <i>Construction</i> | | | | | | |
| <i>Regional and Localized Emissions</i> | Less Than Significant | Less (No Impact) | Similar (Less than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| <i>Toxic Air Contaminants</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| <i>Operation</i> | | | | | | |
| <i>Regional and Localized Emissions</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| <i>Toxic Air Contaminants</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| B. CULTURAL RESOURCES | | | | | | |
| <i>Historic Resources</i> | Less Than Significant | Less (No Impact) | Greater (Significant and Unavoidable) | Similar (Less Than Significant) | Greater (Significant and Unavoidable) | Greater (Significant and Unavoidable) |
| C. ENERGY | | | | | | |
| <i>Construction</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

| Impact Area | Project | Alternative 1: No Project/ No Build Alternative | Alternative 2: No Project/ Development Alternative | Alternative 3: Reduced Density Alternative (30%) | Alternative 4: Modified Design Alternative | Alternative 5: Reduced Grading Alternative |
|---|-----------------------------|--|---|---|---|---|
| <i>Operation</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| D. GREENHOUSE GAS EMISSIONS | | | | | | |
| <i>Greenhouse Gas Emissions</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| E. HAZARDS AND HAZARDOUS MATERIALS | | | | | | |
| <i>Construction</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| <i>Operation</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| F. LAND USE | | | | | | |
| <i>Conflict with Land Use Plans</i> | Less Than Significant | Less (No Impact) | Similar (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| G. NOISE | | | | | | |
| <i>Construction^a</i> | | | | | | |
| <i>On-Site Noise</i> | Significant and Unavoidable | Less (No Impact) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) |

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

| Impact Area | Project | Alternative 1: No Project/ No Build Alternative | Alternative 2: No Project/ Development Alternative | Alternative 3: Reduced Density Alternative (30%) | Alternative 4: Modified Design Alternative | Alternative 5: Reduced Grading Alternative |
|---|-----------------------------|--|---|---|---|---|
| <i>Off-Site Noise</i> | Significant and Unavoidable | Less (No Impact) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) |
| <i>On-Site Vibration (Building Damage)</i> | Less Than Significant | Less (No Impact) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| <i>On-Site Vibration (Human Annoyance)</i> | Significant and Unavoidable | Less (No Impact) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) |
| <i>Off-Site Vibration (Building Damage)</i> | Less Than Significant | Less (No Impact) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| <i>Off-Site Vibration (Human Annoyance)</i> | Significant and Unavoidable | Less (No Impact) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) |
| <i>Operation</i> | | | | | | |
| <i>On-Site Noise</i> | Significant and Unavoidable | Less (No Impact) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) | Similar (Significant and Unavoidable) |
| <i>Off-Site Noise</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

| Impact Area | Project | Alternative 1: No Project/ No Build Alternative | Alternative 2: No Project/ Development Alternative | Alternative 3: Reduced Density Alternative (30%) | Alternative 4: Modified Design Alternative | Alternative 5: Reduced Grading Alternative |
|----------------------------|-----------------------|--|---|---|---|---|
| H. PUBLIC SERVICES | | | | | | |
| <i>Fire Protection</i> | | | | | | |
| <i>Construction</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| <i>Operation</i> | Less Than Significant | Less (No Impact) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| <i>Police Protection</i> | | | | | | |
| <i>Construction</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| <i>Operation</i> | Less Than Significant | Less (No Impact) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| <i>Libraries</i> | | | | | | |
| <i>Construction</i> | Less Than Significant | Less (No Impact) | Similar (Less Than Significant) | 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) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| I. TRANSPORTATION | | | | | | |
| <i>Conflict with Plans</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

| Impact Area | Project | Alternative 1: No Project/ No Build Alternative | Alternative 2: No Project/ Development Alternative | Alternative 3: Reduced Density Alternative (30%) | Alternative 4: Modified Design Alternative | Alternative 5: Reduced Grading Alternative |
|---|-----------------------|--|---|---|---|---|
| <i>Vehicle Miles Travelled</i> | Less Than Significant | Less (No Impact) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) | Similar (Less Than Significant) |
| J. TRIBAL CULTURAL RESOURCES | | | | | | |
| <i>Tribal Cultural Resources</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| K. UTILITIES AND SERVICE SYSTEMS | | | | | | |
| <i>Water Supply and Infrastructure</i> | | | | | | |
| <i>Construction</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| <i>Operation</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| <i>Energy Infrastructure</i> | | | | | | |
| <i>Construction</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |
| <i>Operation</i> | Less Than Significant | Less (No Impact) | Less (Less Than Significant) | Less (Less Than Significant) | Similar (Less Than Significant) | Less (Less Than Significant) |

Table V-1 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

| Impact Area | Project | Alternative 1: No Project/ No Build Alternative | Alternative 2: No Project/ Development Alternative | Alternative 3: Reduced Density Alternative (30%) | Alternative 4: Modified Design Alternative | Alternative 5: Reduced Grading Alternative |
|--|---------|--|---|--|--|---|
| <p>^a Cumulative on- and off-site noise impacts and cumulative on- and-off site vibration impacts with respect to human annoyance during Project construction would be significant and unavoidable. Source: Eyestone Environmental, 2021.</p> | | | | | | |

quality; land use and planning (physical division of a community); population and housing; public services (schools and parks); recreation; utilities and service systems (wastewater and solid waste); and wildfire]. Therefore, no further analysis of these topics in this Draft EIR is required or provided and these topics are not considered with respect to any of the alternatives considered as the same analytic conclusions are anticipated.

5. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain “a statement of the objectives sought by the proposed project.” Section 15124(b) of the CEQA Guidelines further states that “the statement of objectives should include the underlying purpose of the project.” The underlying purpose of the Project is to modernize and expand Our Lady of Mt. Lebanon’s existing church facilities, while preserving the historic cathedral, and introduce a residential use, to allow for the fulfillment of Our Lady of Mt. Lebanon’s mission now and in the future. Consistent with the CEQA Guidelines, the Project’s basic and fundamental objectives are as follows:

1. Consistent with Mayor Eric Garcetti’s goal in Executive Directive 13 of providing 100,000 affordable housing units by 2021, the Density Bonus Ordinance, the Housing Element of the City’s General Plan, and the Wilshire Community Plan, provide a substantial number of new housing units to help meet the significant, unmet demand for market-rate and affordable housing in the Project vicinity and the City.
2. Develop a residential building that will generate sufficient revenue for Our Lady of Mt. Lebanon to ensure its long-term survival.
3. Provide housing near transit stations, transit corridors, and substantial retail/commercial areas and medical facilities, to allow a range of transit options for residents and reduce vehicle miles traveled (VMT) by residents, which results in associated reductions in air pollutants and greenhouse gas emissions.
4. Maintain and enhance the religious presence and operation of the church on the site that has been the home of Our Lady of Mt. Lebanon for more than 50 years, including the retention and expansion of its faith-based programs and charitable ministry.
5. Preserve and rehabilitate the historic cathedral building at its approximate current location in a manner that would not materially impair the significance of the historical resources and meet the current needs of Our Lady of Mt. Lebanon.

6. Replace the existing and outdated ancillary church space with modern and expanded ancillary church facilities to allow Our Lady of Mt. Lebanon to meet the growing needs of its parishioners and the Maronite community.
7. Implement a Project design that is compatible with the building design, configuration and location of the historic cathedral and provides a compatible transition from the cathedral to the residential building.
8. Design the residential building to minimize, to the extent feasible, (a) the impact on views from the residential buildings to the north and west of the Project Site and (b) the privacy of project residents and residents to the north and west of the Project Site within their residential units.
9. Include underground parking for Project uses to provide an appropriate visual separation and transition in massing between, and preserve the design integrity of the respective Project buildings.
10. Locate the multi-purpose room on the same level as, and the other ancillary church space in close proximity to, the cathedral to allow the cohesive and efficient functioning of the church facilities.

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the Project does not proceed. 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: 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. No new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 1 would not alter the existing uses or require any construction activities on the Project Site. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur, and impacts would be less than the Project's impacts, which are less than significant.

(b) Toxic Air Contaminants

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

(2) Operation

(a) Regional and Localized Air Quality Impacts

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 beyond what is currently generated by the existing uses on the Project Site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur. Thus, such operational impacts associated with regional and localized emissions would be less than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

Alternative 1 would not result in new development or increase the intensity of the existing uses on the Project Site. Therefore, no new increase in mobile source emissions and their associated TACs would occur. No operational impact associated with TACs would occur, and such impact would be less than the Project's less-than-significant impact.

b. Cultural Resources

The existing cathedral is eligible for designation as a City of Los Angeles Historic-Cultural Monument (HCM). However, no demolition, grading, or other earthwork activities

that could potentially affect this historical resource would occur under Alternative 1. Therefore, no impact on historical resources would occur, and the impact would be less than the Project's less-than-significant impact.

c. Energy

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

(a) Construction

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

(b) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. As such, the impact would be less than the Project's less-than-significant impacts.

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

Alternative 1 would not alter the existing land uses or site operations on the Project Site. However, unlike the Project, Alternative 1 would not include new buildings meeting updated energy efficiency targets such as the applicable CalGreen requirements and the Los Angeles Green Building Code. Rather, the Project Site would continue to operate with buildings constructed between 1937 and 1969. No impact with respect to conflicts with plans for renewable energy or energy efficiency would occur, and the impact would be less than the Project's less-than-significant impact.

d. Greenhouse Gas Emissions

Alternative 1 would not include the development of any new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated and no new impact associated with global climate change would occur. As such, the impact associated with GHG emissions would be less than the Project's less-than-significant impact.

e. Hazards and Hazardous Materials

(1) Construction

Construction activities would not occur under Alternative 1. Therefore, Alternative 1 would not result in the use, handling, storage, or disposal of hazardous materials. As such, the impact would be less than the Project's less-than-significant impact.

(2) Operation

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase use, handling, storage, or disposal of hazardous materials. As such, the impact would be less than the Project's less-than-significant impact.

f. Land Use

Under Alternative 1, there would be no changes to the physical or operational characteristics of the existing on-site uses. No land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistency with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impact associated with conflicts with land use regulations and plans would occur, and the impact would be less than the Project's less-than-significant impact.

g. Noise

(1) Construction

Construction activities would not occur on the Project Site under Alternative 1. Therefore, no construction-related noise or vibration would be generated on-site or off-site. As such, Alternative 1 would avoid the Project's significant and unavoidable on- and off-site construction noise and on- and off-site construction vibration (pursuant to the threshold for human annoyance) during construction. Alternative 1 would also avoid the Project's cumulative impacts with respect to on- and off-site construction noise and off-site vibration during construction (pursuant to the threshold for human annoyance). No impacts associated with construction noise and vibration would occur, and the impacts would be less than the Project's significant and unavoidable impacts.

(2) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Therefore, no new stationary or mobile noise sources would be introduced to the Project Site or the Project Site vicinity. As such, Alternative 1 would avoid the Project's significant and unavoidable operational noise impact associated with the loading docks. No impact would occur, and the impact would be less than Project's significant and unavoidable impact.

h. Public Services

(1) Fire Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no changes to current conditions, introduction of novel uses, or alterations to the public right of way that would necessitate the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. No impact on fire protection would occur, and the impact would be less than the Project's less-than-significant impact.

(2) Police Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no changes to current conditions, introduction of novel uses, or alterations to the public right of way that would necessitate the addition of a new police station or the expansion, consolidation, or relocation of an existing facility in order to maintain service. No impact on police protection services would occur, and the impact would be less than the less-than-significant impacts of the Project.

(3) Libraries

Alternative 1 would not construct new development or increase operations on-site. Therefore, Alternative 1 would not increase the library service population such that the addition of new library facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impact on library services would occur, and the impact would be less than the Project's less-than-significant impact on libraries.

i. Transportation

Since the No Project/No Build Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or

alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to potential conflicts with programs, plans, ordinances, or policies addressing the circulation system or vehicle miles traveled (VMT). Thus, no impacts would occur, and the impacts would be less than the Project's less-than-significant impacts.

j. Tribal Cultural Resources

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

k. Utilities and Service Systems

(1) Water Supply

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term water demand on the Project Site. No impact on water supply and water infrastructure would occur, and the impact would be less than the Project's less-than-significant impact.

(2) Energy Infrastructure

Alternative 1 would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site and no new or upgraded infrastructure would be required. No operational impact related to energy infrastructure would occur, and the impact would be less than the Project's less-than-significant impact.

3. Comparison of Impacts

As evaluated above, the No Project/No Build Alternative 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.

4. Relationship of the Alternative to Project Objectives

Under Alternative 1, the existing uses would remain on the Project Site and no new development would occur. As such, Alternative 1 would partially meet Project objectives 4 and 5 because the religious operation of the church would be maintained, but not enhanced, and the cathedral would be preserved but not rehabilitated:

4. Maintain and enhance the religious presence and operation of the church on the site that has been the home of Our Lady of Mt. Lebanon for more than 50 years, including the retention and expansion of its faith-based programs and charitable ministry.
5. Preserve and rehabilitate the historic cathedral building at its approximate current location in a manner that would not materially impair the significance of the historical resources and meet the current needs of Our Lady of Mt. Lebanon.

However, Alternative 1 would not meet the underlying purpose of the Project or the Project objectives. Specifically, the Project would not:

1. Consistent with Mayor Eric Garcetti's goal in Executive Directive 13 of providing 100,000 affordable housing units by 2021, the Density Bonus Ordinance, the Housing Element of the City's General Plan, and the Wilshire Community Plan, provide a substantial number of new housing units to help meet the significant, unmet demand for market-rate and affordable housing in the Project vicinity and the City.
2. Develop a residential building that will generate sufficient revenue for Our Lady of Mt. Lebanon to ensure its long-term survival.
3. Provide housing near transit stations, transit corridors, and substantial retail/commercial areas and medical facilities, to allow a range of transit options for residents and reduce vehicle miles traveled (VMT) by residents, which results in associated reductions in air pollutants and greenhouse gas emissions.
6. Replace the existing and outdated ancillary church space with modern and expanded ancillary church facilities to allow Our Lady of Mt. Lebanon to meet the growing needs of its parishioners and the Maronite community.
7. Implement a Project design that is compatible with the building design, configuration and location of the historic cathedral and provides a compatible transition from the cathedral to the residential building.

8. Design the residential building to minimize, to the extent feasible, (a) the impact on views from the residential buildings to the north and west of the Project Site and (b) the privacy of project residents and residents to the north and west of the Project Site within their residential units.
9. Include underground parking for Project uses to provide an appropriate visual separation and transition in massing between , and preserve the design integrity of the respective Project buildings.
10. Locate the multi-purpose room on the same level as, and the other ancillary church space in close proximity to, the cathedral to allow the cohesive and efficient functioning of the church facilities.

Overall, Alternative 1 would not meet the Project's underlying purpose to modernize existing church 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.

V. Alternatives

B. Alternative 2: No Project/Development Alternative

1. Description of the 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, , the buyer/developer could 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/Development Alternative 2 is the demolition of all of 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.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 2 would result in air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day

to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 2, because the overall amount of construction would be reduced in comparison to the Project, the number of truck trips would also be reduced in comparison to the Project. Excavation for subterranean parking would also be reduced with one less parking level. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. As maximum daily conditions are used for measuring impact significance, regional and localized impacts under Alternative 2 on these days would be similar to the Project's less-than-significant impact.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 2 would be less than those of the Project because Alternative 2 would require less overall construction as it would not include the reconstruction of the cathedral or the construction of the ancillary church building and would result in fewer truck trips and less excavation with respect to the subterranean parking levels. Therefore, the impact due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant and less than the Project's less-than-significant impact.

(2) Operation

(a) Regional and Localized Air Quality Impacts

As with the Project, under Alternative 2, operational regional air pollutant emissions would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. Development of Alternative 2 would result in fewer daily trips than the Project (i.e., 530 under Alternative 2 vs. 580 with the Project³). As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be

³ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 2.

less than the Project. Therefore, the impact associated with regional operational emissions would be less than significant and less than the Project's less-than-significant impact.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, the localized impact from on-site emission sources associated with Alternative 2 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. Therefore, the impact would be less than significant and less than the Project's less-than-significant impact.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers), though with reduced square footage, fewer truck trips would be anticipated. However, the proposed uses associated with the Project, and similarly with Alternative 2, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not part of the Project or Alternative 2. Similar to the Project, Alternative 2 would not cause the release of substantial amounts of TACs and would be consistent with California Air Resources Board (CARB) and South Coast Air Quality Management District (SCAQMD) guidelines regarding TAC sources in proximity to existing sensitive land uses. Therefore, the operational TAC impact under Alternative 2 would be less than significant and less than the Project's less-than-significant impact due to the reduced square footage.

b. Cultural Resources

Under Alternative 2, the Project Site and its existing improvements would be sold to a developer. It is reasonable to assume that the buyer/developer would seek to demolish all of the existing improvements, including the cathedral building, the only historical resource on the Project Site because it is eligible for designation as a Los Angeles HCM. Demolition of the cathedral would materially impair the cathedral's historic integrity, so that it would no longer be eligible for a listing as a Los Angeles HCM. Therefore, the direct impact on historical resources under Alternative 2 would be significant and unavoidable, and would be greater than the Project's less-than-significant impact. With respect to indirect impacts, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no other historical resources within 0.25 mile of the Project Site. Therefore, similar to

the Project, Alternative 2 would not result in any significant indirect impact to any adjacent historical resource.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, the Los Angeles Department of Water and Power (LADWP) has confirmed that it would have the energy capacity to serve the Project during construction, so that adequate capacity exists for Alternative 2, which involves reduced construction activity. Furthermore, as with the Project, through regulatory requirements, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, the impact on energy resources associated with short-term construction activities under Alternative 2 would be less than significant and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than for the Project. In addition, as previously discussed, Alternative 2 would result in fewer daily vehicle trips than the Project (i.e., 530 under Alternative 2 vs. 580 with the Project⁴). Thus, the associated consumption of petroleum-based fuels under Alternative 2 would also be less than for the Project. Accordingly, under Alternative 2, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 2 would implement project design features that would improve energy efficiency and reduce the impact on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. Therefore, the impact on energy resources under

⁴ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 2.

Alternative 2 would be less than significant, and less than the Project's less-than-significant impact.

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

Like the Project, Alternative 2 would comply with Title 24 requirements for "Solar Ready Buildings" which requires a certain area of rooftop to be set aside for installation of solar panels and would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, wind, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, Alternative 2 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, similar to the Project, Alternative 2 would not conflict with plans for renewable energy or energy efficiency and its impact would be less than significant.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 2 is a residential project that includes the same number of residential units and approximately the same floor area as the residential component of the Project. Therefore, under Alternative 2, the total energy and water consumption would be reduced compared to the Project. In addition, as discussed above, the number of trips generated by Alternative 2 would be less than the number of trips generated by the Project (i.e., 530 under Alternative 2 vs 580 with the Project⁵). Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. As with the Project, Alternative 2 would incorporate project design features to reduce GHG emissions similar to GHG-PDF-1, which includes sustainability features that exceed applicable code requirements and GHG-PDF-2, which prohibits the use of natural gas-fueled fireplaces in the proposed residential units and would be designed to comply with the City's Green Building Ordinance, as applicable. Similar to the Project, Alternative 2 would be a mixed-use development on an urban infill site within a TPA and HQTA. Because of Alternative 2's location, reduction in VMT, compliance with the City's Green Building Ordinance, and the implementation of appropriate sustainability features, it is

⁵ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 2.

anticipated that Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, including the Climate Change Scoping Plan and its subsequent updates, SCAG's RTP/SCS, and the City's Green New Deal. Thus, the impact related to GHG emissions under Alternative 2 would be less than significant, and less than the Project's less-than-significant impact.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 2, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Such use would be expected to be reduced in comparison to the Project due to the reduced construction activities. In any event, like the Project, Alternative 2 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. In addition, the potential for construction activities associated with this alternative to uncover unknown underground storage tanks would be similar to that of the Project due to similar excavation activities. Similarly, the potential to encounter previously unidentified oil wells during construction would be similar to the Project.

With respect to the perchloroethylene (PCE), trichloroethylene (TCE), and cis-1,2-dichloroethylene (cis-1,2-DCE) identified in groundwater and soil vapor samples in the Phase II, Alternative 2 would be required to follow the recommendations of a Soil Management Plan prepared to address the following: describe specific soil handling controls required to comply with local, state, and federal overseeing agencies; prevent unacceptable exposure to contaminated soil; and prevent the improper disposal of contaminated soil.

Similar to the Project, while asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, Alternative 2 would also comply with relevant regulations and requirements related to asbestos-containing materials and lead-based paint to ensure that impacts would be less than significant. Furthermore, as with the Project, in the event that polychlorinated biphenyls (PCBs) are found within areas proposed for demolition during construction of Alternative 2, suspect materials would

be removed in accordance with all applicable federal, state, and local regulations. In addition, a temporary dewatering system would be in place during demolition and building construction of Alternative 2, which would reduce impacts associated with methane gas.

With regard to emergency response plans, like the Project, construction activities for Alternative 2 would be primarily confined to the Project Site. Also, similar to the Project, construction of Alternative 2 would not close or block access to any properties in the vicinity of the Project Site.

Based on the above, due to the reduced construction activities, construction-related impact associated with hazards and hazardous materials under Alternative 2 would be less than significant and less than the Project's less-than-significant impact.

(2) Operation

Similar to the Project, Alternative 2 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 2 would not include the installation of underground or aboveground storage tanks. The operation of Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in developments such as Alternative 2, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced compared to the Project due to the reduction in uses. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements.

With respect to the PCE, TCE, and cis-1,2-DCE identified in groundwater and soil vapor samples in the Phase II, like the Project, development of Alternative 2 would not exacerbate the potential impact of this existing groundwater and soil contamination on future residents. The maximum contaminant levels (MCLs) identified in the Phase II are drinking water standards, and future residents would not be exposed to or drink the groundwater. Moreover, as explained in the methane discussion below, the proposed mat foundation and retaining walls for the subterranean parking structure would be designed and waterproofed to for an undrained condition that would withstand hydrostatic forces and thereby prevent methane intrusion. This methane barrier would be equally effective in preventing the intrusion of soil vapors.

As with the Project, Alternative 2 would also comply with the City's Methane Mitigation Ordinance No. 175790. Based on the methane mitigation requirements therein, the Project Site is considered to be Design Level V. Therefore, Alternative 2 would be required to include methane mitigation measures as described in Los Angeles Municipal Code (LAMC) Section 91.7104. These requirements include both passive systems such as dewatering and perforated horizontal pipes as well as active systems such as mechanical

extraction and alarm systems. Alternately, similar to the Project, Alternative 2 may include an alternative methane mitigation system designed by an architect, engineer or geologist that is equivalent to providing a permanent dewatering system and related mitigation as described in the City's methane mitigation requirements (LAMC Section 91.7104).

Based on the above, due to the reduction in development, the impact related to hazards and hazardous materials associated with the operation of Alternative 2 would be less than significant, and less than the Project's less-than-significant impact.

f. Land Use

Alternative 2 would involve the removal of existing facilities, 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 Project. The total square footage would be reduced from approximately 180,080 square feet to approximately 148,641 square feet. Accordingly, the Alternative's floor area ratio and density would be reduced compared to the Project; specifically, the Project would have a floor area ratio (FAR) of 4.11:1 as compared to the Project's FAR of 4.99:1. Alternative 2 would include the same number of residential units and, with approval of discretionary actions and implementation of design features comparable to those of the Project, Alternative 2 would be consistent with the overall intent of applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including the City's General Plan and the LAMC. Thus, the Project's impact related to land use consistency under Alternative 2 would be less than significant and similar to the Project's less-than-significant impact.

g. Noise

(1) Construction

Alternative 2 would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation), but would require less excavation and soil export than the Project since Alternative 2 includes one less subterranean parking level. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 2 would not require the extent of site excavation and soil export necessary under the Project, the amount and the overall duration of construction would be reduced. Alternative 2 would also implement project design features similar to NOI-PDF-1 through NOI-PDF-4 to reduce construction noise and vibration impacts during construction. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be expected to be

similar since only the overall duration, but not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 2 when compared to the Project. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 2 would also be similar to those associated with the Project. Alternative 2 would comply with the same applicable regulatory requirements and implement similar project design features (NOI-PDF-1 through NOI-PDF-4, as noted above) and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance during construction, including Mitigation Measure NOI-MM-1, which requires the installation of a temporary sound barrier. As with the Project, construction of Alternative 2 would result in significant and unavoidable impacts with respect to on-site noise and vibration during construction, as well as significant and unavoidable cumulative off-site noise impacts.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the mat foundation phase. Since Alternative 2 would not require the extent of site excavation and soil export necessary under the Project, the number of construction haul trucks, and thereby trips, would be reduced. Thus, it can be reasonably concluded that temporary noise and vibration impacts (pursuant to the threshold for building damage) from off-site construction traffic generated by Alternative 2 would also be less than significant and less than the impacts of the Project. However, although construction haul trucks and trips would be reduced under Alternative 2, vibration created by construction trucks traveling along the proposed haul route could exceed the threshold of significance for human annoyance for sensitive uses. Thus, it is conservatively assumed that temporary and intermittent off-site vibration impacts (pursuant to the threshold for human annoyance) under Alternative 2 would be significant and unavoidable and similar to the Project's significant and unavoidable impact.

In addition, similar to the Project, Alternative 2 would result in significant cumulative on-site and off-site construction noise and off-site vibration impacts related to human annoyance.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 2 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). Alternative 2 would also implement a project design feature similar to NOI-PDF-5 to

limit the noise level of any outdoor amplified sound systems. In addition, under Alternative 2, the proposed loading dock and trash collection areas would be enclosed and located within the building, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Specifically, like the Project, simultaneous operation of the two loading docks under Alternative 2 would result in a significant impact at receptor location R1. Outdoor noise sources associated with open space areas would be similar to the Project because these areas would include the same uses and would be located at similar distances from sensitive receptors as the Project. Alternative 2 would include fewer vehicle parking spaces than the Project; however, since the parking levels would be fully enclosed, potential noise associated with parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 2 would be substantially similar to the Project. As such, due to the simultaneous operation of the loading docks, the on-site operational noise impact under Alternative 2 would be significant and unavoidable, and similar to the Project's significant and unavoidable impact.

As discussed above, Alternative 2 would result in fewer daily vehicle trips than the Project (i.e., 530 under Alternative 2 vs 580 with the Project⁶). Accordingly, the off-site noise impact associated with traffic under Alternative 2 would be less than significant and less than the Project's less-than-significant impact.

h. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the Project, construction of Alternative 2 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities of Alternative 2 to expose people to the risk of fire or explosion related to hazardous materials.

⁶ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 2.

In addition, similar to the Project, a Construction Traffic Management (CTM) Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, due to the reduction in construction activities and duration, the construction-related impact on fire protection services under Alternative 2 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

Given the reduction in uses under Alternative 2, the fire service population generated by this alternative would be less than the Project's estimated fire service population. While Alternative 2 would increase the existing fire service population of the Project area compared to existing conditions, the increase would be less than the Project due to the omission of church facilities. Like the Project, Alternative 2 would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9), the Fire Code (Chapter 7) and Section 57.507.3.1 regarding fire flow requirements. As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates adequate hydrant pressure and flow is not currently available at the Project Site. Therefore like the Project, Alternative 2 would include necessary upgrades to improve the surrounding water infrastructure that would facilitate flow and pressure requirements, but those upgrades would be limited to increasing the fire flow of two fire hydrants and would not be substantial. Thus, as with the Project, Alternative 2 would not result in the need for new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on fire protection services under Alternative 2 would be less than significant, and similar to the Project's less-than-significant impact.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to those of the Project. However, due to the reduction in development, the overall amount of construction activities and duration of construction would be reduced compared to the Project. Alternative 2 would also implement a project design feature similar to POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a CTM Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, due to the reduction in construction activities and duration, the

construction-related impact on police protection services under Alternative 2 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

Given the reduction in uses proposed under Alternative 2, the police service population generated by this alternative would be less than the Project's estimated police service population. While Alternative 2 would increase the existing police service population of the Project area compared to existing conditions, the increase would be less than the Project due to the omission of church facilities. Like the Project, Alternative 2 would implement project design features similar to POL-PDF-2 through POL-PDF6 which include a 24-hour camera network, on-site security, appropriate lighting to ensure security, the prevention of concealed spaces, and coordination with the Los Angeles Police Department (LAPD). The design features would help offset the increase in demand for police protection services generated by Alternative 2, by reducing the number of calls for police protection services. Thus, as with the Project, Alternative 2 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on police protection services under Alternative 2 would be less than significant, and similar to the Project's less-than-significant impact.

(3) Libraries

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, the impact on library facilities and services during construction of Alternative 2 would be less than significant and similar to the Project's less-than-significant impact.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 2 would generate a new residential population on the Project Site, which could create a demand for library facilities and services. Alternative 2 would include the same number of residential units, which would generate the same number of residents as the Project. Alternative 2 would also eliminate the existing church employees because the existing church facilities would be removed. As such, the impact on library facilities and services under Alternative 2 would be less than significant and less than the Project's less-than-significant impact.

i. Transportation

As discussed above, Alternative 2 would include the same number of residential units on the Project Site, but the existing church use would be eliminated, resulting in a lower on-site population than the Project. Specifically, using the City's VMT calculator, the proposed uses for Alternative 2 would result in a total on-site population of 345 persons which is the same as the Project and 530 daily vehicle trips compared to 580 with the Project.⁷ As such, the impact to transit, bicycle, and pedestrian facilities would be less than the Project's less-than-significant impact. As discussed below, the impact with respect to VMT would be less than significant, similar to the Project. Therefore, the impact under Alternative 2 associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than the Project's less-than-significant impact.

With respect to VMT, accounting for the same project design features as the Project and including the implementation of Mitigation Measure TR-MM-1, Alternative 2 would generate 2,645 daily VMT compared to 3,312 daily VMT with the Project. As detailed in the Los Angeles Department of Transportation's (LADOT) Transportation Assessment Guidelines (TAG), because, like the Project, Alternative 2 would not include office or commercial uses, the VMT per employee for these uses was not considered for purposes of identifying significant work VMT impacts. Thus, based on the population assumptions, Alternative 2 would generate an average household VMT of 5.8 per capita, which is the same as the Project and would fall below the significance threshold for the Central Area Planning Commission (APC) of 6.0. Therefore, the impact under Alternative 2 with respect to conflicts with CEQA Guidelines Section 15064.3(b) would be less than significant and similar to the Project's less-than-significant impact.

⁷ *The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 2.*

j. Tribal Cultural Resources

As previously discussed, Alternative 2 would include one less subterranean parking level than the Project. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Like the Project, Alternative 2 would be subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. Accordingly, because Alternative 2 involves less excavation, the impact on tribal cultural resources under Alternative 2 would be less than significant and less than the Project's less-than-significant impact.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. This demand would be less than for the Project due to the reduction in construction activities and duration. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 2 would also be expected to be met by the City's available water supplies.

Furthermore, as with the Project, the construction of new on-site water distribution lines to serve the new buildings would be required. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a CTM Plan, similar to the Project, would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, the impact on water supply and infrastructure associated with short-term construction activities under Alternative 2 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 2 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development, water demand for Alternative 2 would be less than the Project's estimated increase in water demand. Additionally, like the Project, Alternative 2 would include a project design feature similar to WAT-PDF-1 to reduce water demand. Therefore, as with the Project, the estimated water demand under Alternative 2 would not exceed the available supplies projected by LADWP. Furthermore, the estimated water demand under Alternative 2 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be less than the water demand generated by the Project. Moreover, similar to the Project, Alternative 2 would include the construction of the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new building. Therefore, the impact related to operational water supply under Alternative 2 would be less than significant, and less than the Project's less-than-significant impact.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, the impact on energy infrastructure associated with short-term construction activities under Alternative 2 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 2 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, the operational impact on energy infrastructure under Alternative 2 would be less than significant and less than the Project's less-than-significant impact.

3. Comparison of Impacts

As evaluated above, 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.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would include the same residential component as the Project. Alternative 2 would not meet the underlying purpose of the Project to modernize and expand Our Lady of Mt. Lebanon's existing church facilities, while preserving the historic cathedral, and introduce a residential use, to allow for the fulfillment of Our Lady of Mt. Lebanon's mission now and in the future. Alternative 2 also would not meet Objectives 2, 4, 5, 6, 7, 9, and 10 because the cathedral and other church facilities would be demolished. Specifically, Alternative 2 would not:

2. Develop a residential building that will generate sufficient revenue for Our Lady of Mt. Lebanon to ensure its long-term survival.
4. Maintain and enhance the religious presence and operation of the church on the site that has been the home of Our Lady of Mt. Lebanon for more than 50 years, including the retention and expansion of its faith-based programs and charitable ministry.
5. Preserve and rehabilitate the historic cathedral building at its approximate current location in a manner that would not materially impair the significance of the historical resources and meet the current needs of Our Lady of Mt. Lebanon.
6. Replace the existing and outdated ancillary church space with modern and expanded ancillary church facilities to allow Our Lady of Mt. Lebanon to meet the growing needs of its parishioners and the Maronite community.
7. Implement a Project design that is compatible with the building design, configuration and location of the historic cathedral and provides a compatible transition from the cathedral to the residential building.

9. Include underground parking for Project uses to provide an appropriate visual separation and transition in massing between , and preserve the design integrity of the respective Project buildings.
10. Locate the multi-purpose room on the same level as, and the other ancillary church space in close proximity to, the cathedral to allow the cohesive and efficient functioning of the church facilities.

However, Alternative 2 would meet all of the Project's residential objectives to a similar extent as the Project because it would redevelop 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 as the proposed Project. Specifically, Alternative 2 would or could:

1. Consistent with Mayor Eric Garcetti's goal in Executive Directive 13 of providing 100,000 affordable housing units by 2021, the Density Bonus Ordinance, the Housing Element of the City's General Plan, and the Wilshire Community Plan, provide a substantial number of new housing units to help meet the significant, unmet demand for market-rate and affordable housing in the Project vicinity and the City.
3. Provide housing near transit stations, transit corridors, and substantial retail/commercial areas and medical facilities, to allow a range of transit options for residents and reduce vehicle miles traveled (VMT) by residents, which results in associated reductions in air pollutants and greenhouse gas emissions.
8. Design the residential building to minimize, to the extent feasible, (a) the impact on views from the residential buildings to the north and west of the Project Site and (b) the privacy of project residents and residents to the north and west of the Project Site within their residential units.

V. Alternatives

C. Alternative 3: Reduced Density Alternative

1. Description of the 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 the proposed residential density and ancillary church 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. Graphic illustrations of this Alternative are shown in Figure V-1 and Figure V-2 on pages V-42 and V-43.

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



Figure V-1
Reduced Density Alternative



Figure V-2
Reduced Density Alternative

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.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 3, because the overall amount of construction would be reduced in comparison to the Project, the number of truck trips would also be reduced in comparison to the Project. Excavation for subterranean parking would also be reduced with one less parking level. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. As maximum daily conditions are used for measuring impact significance, regional and localized construction impacts under Alternative 3 on these days would be similar to the Project's less-than-significant impact.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 3 would be less than those of the Project because Alternative 3 would require less overall construction due to the decrease in building height and overall square footage, fewer truck trips, and less excavation for subterranean parking levels. Therefore, the construction impact related to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant, and less when compared to the Project's less-than-significant impact.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. Development of Alternative 3 would result in fewer daily trips than the Project (i.e., 411 under Alternative 3 vs 580 with the Project).⁸ As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, the impact associated with regional operational emissions under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

⁸ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 3.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. Therefore, the operational impact under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers), though with reduced square footage, fewer truck trips would be anticipated. However, the proposed uses associated with the Project, and similarly with Alternative 3, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not part of the Project or Alternative 3. Similar to the Project, Alternative 3 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Therefore, the operational TAC impact under Alternative 3 would be less than significant, and similar to the Project's less-than-significant impact.

b. Cultural Resources

As with the Project, Alternative 3 would include the deconstruction, reassembly, rehabilitation, and limited alteration of the existing cathedral building, which is eligible for designation as a Los Angeles HCM. Therefore, similar to the Project, Alternative 3 would not cause a substantial adverse change in the significance of the cathedral, the only historical resource on the Project Site and which would be rehabilitated. Although the deconstruction and reassembly of the cathedral would impact the building's integrity of design, workmanship, materials, and feeling, these aspects of integrity have already been diminished by previous alterations. As such, like the Project, Alternative 3 would not materially impair the cathedral's integrity in a way that would make it no longer eligible for a listing as a Los Angeles HCM. Therefore, similar to the Project, the direct impact on historical resources under Alternative 3 would be less than significant, and similar to the Project's less-than-significant impact. With respect to indirect impacts, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no other historical resources within 0.25 mile of the Project Site. Since there are no historical resources in the

immediate vicinity of the Project Site, similar to the Project, Alternative 3 would not result in any significant indirect impact to any adjacent historical resource.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the supply in the Project area would have the capacity to serve the Project during construction, so that adequate capacity exists for reduced-density Alternative 3. Furthermore, as with the Project, through compliance with regulatory requirements, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, the impact on energy resources associated with short-term construction activities under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 3 would generate increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than the Project. In addition, as previously discussed, Alternative 3 would result in fewer daily vehicle trips than the Project (i.e., 411 under Alternative 3 vs. 580 with the Project).⁹ Therefore, the associated consumption of petroleum-based fuels under Alternative 3 would also be less than the Project. Accordingly, under Alternative 3, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 3 would implement project design features that would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. Therefore, the operational impact on

⁹ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 2.

energy resources under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

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

Like the Project, Alternative 3 would comply with Title 24 requirements for "Solar Ready Buildings," which requires a certain area of rooftop to be set aside for installation of solar panels and would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, wind, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, Alternative 3 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, similar to the Project, Alternative 3 would not conflict with plans for renewable energy or energy efficiency and its impact would be less than significant.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 3 would involve a similar mix of land uses as the Project but would reduce the total amount of development on the Project Site by 72,032 square feet. Therefore, under Alternative 3, the total energy and water consumption would be reduced compared to the Project. In addition, as discussed above, the number of trips generated by Alternative 3 would be less than the number of trips generated by the Project (i.e., 411 under Alternative 3 vs 580 with the Project¹⁰). Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. As with the Project, Alternative 3 would incorporate project design features to reduce GHG emissions similar to GHG-PDF-1, which includes sustainability features that exceed applicable code requirements and GHG-PDF-2, which prohibits the use of natural gas-fueled fireplaces in the proposed residential units and would be designed to comply with the City's Green Building Ordinance, as applicable. Similar to the Project, Alternative 3 would be a mixed-use development on an urban infill site within a TPA and HQT. Because of Alternative 3's mixed-use nature, location, reduction in VMT, compliance with the City's Green Building Ordinance, and the implementation of appropriate sustainability

¹⁰ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 3.

features, Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans including the Climate Change Scoping Plan and its subsequent updates, SCAG's RTP/SCS, and the City's Green New Deal. Therefore, the impact related to GHG emissions under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 3, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Such use would be expected to be reduced in comparison to the Project due to the reduced construction activities. In any event, like the Project, Alternative 3 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. In addition, the potential for construction activities associated with this alternative to uncover unknown underground storage tanks would be similar to that of the Project due to similar excavation activities. Similarly, the potential to encounter previously unidentified oil wells during construction would be similar to the Project.

With respect to the PCE, TCE, and cis-1,2-DCE identified in groundwater and soil vapor samples in the Phase II, as is the case with the Project, Alternative 3 would follow the recommendations of the Soil Management Plan that was prepared to address the following: describe specific soil handling controls required to comply with local, state, and federal overseeing agencies; prevent unacceptable exposure to contaminated soil; and prevent the improper disposal of contaminated soil.

Similar to the Project, while asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, Alternative 3 would also comply with relevant regulations and requirements related to asbestos-containing materials and lead-based paint to ensure that impacts would be less than significant. Furthermore, as with the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 3, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. In addition, a temporary dewatering

system would be in place during demolition and building construction of Alternative 3, which would reduce impacts associated with methane gas.

Based on the above, due to the reduced construction activities, construction-related impact associated with hazards and hazardous materials under Alternative 3 would be less than significant, and less than the less-than-significant impact of the Project.

(2) Operation

Similar to the Project, Alternative 3 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 3 would not include the installation of underground or aboveground storage tanks. The operation of Alternative 3 would involve the limited use of potentially hazardous materials typical of those used in developments such as Alternative 3, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced compared to the Project due to the reduction in uses. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements.

With respect to the PCE, TCE, and cis-1,2-DCE identified in groundwater and soil vapor samples in the Phase II, like the Project, development of Alternative 3 would not exacerbate the potential impact of this existing groundwater and soil contamination on future residents. The MCLs identified in the Phase II are drinking water standards, and future residents would not be exposed to or drink the groundwater. Moreover, as explained in the methane discussion below, the proposed mat foundation and retaining walls for the subterranean parking structure would be designed and waterproofed to for an undrained condition that would withstand hydrostatic forces and thereby prevent methane intrusion. This methane barrier would be equally effective in preventing the intrusion of soil vapors.

As with the Project, Alternative 3 would also comply with the City's Methane Mitigation Ordinance No. 175790. Based on the methane mitigation requirements therein, the Project Site is considered to be Design Level V. Similar to the Project, Alternative 3 would include an alternative methane mitigation system designed by an architect, engineer or geologist that is equivalent to providing a permanent dewatering system and related mitigation as described in the City's methane mitigation requirements (LAMC Section 91.7104) and the proposed mat foundation would be designed and waterproofed to for an undrained condition that would withstand hydrostatic forces and thereby prevent methane intrusion.

Based on the above, due to the reduction in development, the impact related to hazards and hazardous materials during operation of Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

f. Land Use

Alternative 3 would involve the same uses as the Project with an approximately 30-percent density reduction and an approximately 40-percent reduction in floor area, which would reduce the residential units from 153 to 107 and reduce the proposed ancillary church uses from 23,649 square feet to 14,189 square feet. Accordingly, the floor area ratio and density under Alternative 3 would be reduced compared to the Project, and Alternative 3 would have an FAR of 3:1 as compared to the Project's FAR of 4.99:1. With approval of the required discretionary actions, Alternative 3 would be consistent with the overall intent of applicable policies and objectives in local and regional plans that govern development on the Project Site, including the City's General Plan, the Community Plan, and the LAMC. Therefore, the impact related to land use consistency under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

g. Noise

(1) Construction

Alternative 3 would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation), but would require less excavation and soil export than the Project since Alternative 3 includes one less parking level. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 3 would not require the extent of site excavation and soil export necessary under the Project, the amount and the overall duration of construction would be reduced. Alternative 3 would also implement project design features similar to NOI-PDF-1 through NOI-PDF-4 to reduce construction noise and vibration impacts during construction. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be expected to be similar since only the overall duration, but not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 3 when compared to the Project. Furthermore, like the Project, Alternative 3 would require demolition of the existing non-historic buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 3 would also be similar to those associated with the Project. Alternative 3 would comply with the same applicable regulatory requirements and implement similar project design features (NOI-PDF-1 through NOI-PDF-4, as noted above) and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance during construction, including Mitigation Measure NOI-MM-1, which requires the installation of a temporary sound barrier. As with the Project, construction of Alternative 3 would result in significant and unavoidable impacts

with respect to on-site noise and vibration during construction, as well as significant and unavoidable cumulative off-site noise impacts.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the mat foundation phase. Since Alternative 3 would not require the extent of site excavation and soil export necessary under the Project, the number of construction haul trucks and, thereby, trips would be reduced. Thus, it can be reasonably concluded that temporary noise and vibration impacts (pursuant to the threshold for building damage) from off-site construction traffic generated by Alternative 3 would also be less than significant and less than the impacts of the Project. However, although construction haul trucks and trips would be reduced under Alternative 3, vibration created by construction trucks traveling along the proposed haul route could exceed the threshold of significance for human annoyance for sensitive uses. Thus, it is conservatively assumed that temporary and intermittent off-site vibration impacts (pursuant to the threshold for human annoyance) under Alternative 3 would be significant and unavoidable, and similar to the Project's significant and unavoidable impact.

In addition, similar to the Project, Alternative 3 would result in significant cumulative on-site and off-site construction noise and off-site vibration impacts related to human annoyance.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 3 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). Alternative 3 would also implement a project design feature similar to NOI-PDF-5 to limit the noise level of any outdoor amplified sound systems. In addition, under Alternative 3, the proposed loading dock and trash collection areas would be enclosed and located within the building, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Specifically, like the Project, simultaneous operation of the two loading docks under Alternative 3 would result in a significant impact at receptor location R1. Outdoor noise sources associated with open space areas would be similar to the Project because these areas would include the same uses and would be located at similar distances from sensitive receptors as the Project. Alternative 3 would include fewer vehicle parking spaces than the Project; however, since the parking levels would be fully enclosed, potential noise associated with

parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 3 would be substantially similar to the Project. As such, due to the simultaneous operation of the loading docks, the on-site operational noise impact under Alternative 3 would be significant and unavoidable, and similar to the Project's significant and unavoidable impact.

As discussed above, Alternative 3 would result in fewer daily vehicle trips than the Project (i.e., 411 under Alternative 3 vs 580 with the Project¹¹). Accordingly, the off-site noise impact associated with traffic under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

h. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the Project, construction of Alternative 3 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities of Alternative 3 to expose people to the risk of fire or explosion related to hazardous materials.

In addition, similar to the Project, a CTM Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, due to the reduction in construction activities and duration, the construction-related impact on fire protection services under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

Given the reduction in uses proposed under Alternative 3, the fire service population generated by this alternative would be less than the Project's estimated fire service

¹¹ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 3.

population. While Alternative 3 would increase the existing fire service population of the Project area compared to existing conditions, the increase would be less than the Project due to the reduction in floor area. Like the Project, Alternative 3 would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9), the Fire Code (Chapter 7) and Section 57.507.3.1 regarding fire flow requirements. As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates adequate hydrant pressure and flow is not currently available at the Project Site. Therefore, like the Project, Alternative 3 would include necessary upgrades to improve the surrounding water infrastructure that would facilitate flow and pressure requirements, but those upgrades would be limited to increasing the fire flow of two fire hydrants and would not be substantial. Thus, as with the Project, Alternative 3 would not result in the need for new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on fire protection services under Alternative 3 would be less than significant, and similar to the Project's less-than-significant impact.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3 would be similar to those of the Project. However, due to the reduction in development, the overall amount of construction activities and duration of construction would be reduced compared to the Project. Alternative 3 would also implement a project design feature similar to POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a CTM Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, due to the reduction in construction activities and duration, the construction-related impact on police protection services under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

Given the reduction in uses proposed under Alternative 3, the police service population generated by this alternative would be less than the Project's estimated police service population. While Alternative 3 would increase the existing police service population of the Project area compared to existing conditions, the increase would be less than the Project due to the 30-percent density reduction and 40-percent reduction in floor area. Like the Project, Alternative 3 would implement project design features similar to

POL-PDF-2 through POL-PDF6 which include a 24-hour camera network, on-site security, appropriate lighting to ensure security, the prevention of concealed spaces and coordination with LAPD. The design features would help offset the increase in demand for police protection services generated by Alternative 3 by reducing the number of calls for police protection services. Thus, as with the Project, Alternative 3 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on police protection services under Alternative 3 would be less than significant, similar to the Project's less-than-significant impact.

(3) Libraries

(a) Construction

Similar to the Project, construction of Alternative 3 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, the impact on library facilities and services during construction of Alternative 3 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 3 would generate a new residential population on the Project Site, which could create a demand for library facilities and services. However, Alternative 3 would include fewer residential units, which would consequently generate fewer residents than the Project. The number of church employees generated by Alternative 3 would be the same as the Project, and the number of employees under either scenario would be the same as the number of existing church employees. As such, the operational impact on library

facilities and services under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

i. Transportation

As discussed above, Alternative 3 would include 108,048 square feet of uses on the Project Site compared to the Project's 180,080 square feet of uses, and would result in a lower on-site population than the Project. Specifically, using the City's VMT calculator, the proposed uses for Alternative 3 would result in a total on-site population of 241 persons compared to 345 persons with the Project and 411 daily vehicle trips compared to 580 with the Project.¹² As such, the impact on transit, bicycle, and pedestrian facilities would be less than the Project's less-than-significant impact. As discussed below, the impact with respect to VMT would be less than significant, similar to the Project. Therefore, the impacts under Alternative 3 associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than the Project's less-than-significant impact.

With respect to VMT, accounting for the same project design features as the Project and including the implementation of Mitigation Measure TR-MM-1, Alternative 3 would generate 2,356 daily VMT compared to 3,312 daily VMT with the Project. As detailed in the TAG, because like the Project Alternative 3 would not include office or commercial uses, the VMT per employee for these uses was not considered for purposes of identifying significant work VMT impacts. Thus, based on the population assumptions, Alternative 3 would generate an average household VMT of 5.8 per capita, which is the same as the Project and would fall below the significance threshold for the Central Area Planning Commission (APC) of 6.0. Therefore, the impact under Alternative 3 with respect to conflicts with CEQA Guidelines Section 15064.3(b) would be less than significant, and similar to the Project's less-than-significant impact.

j. Tribal Cultural Resources

As previously discussed, Alternative 3 would include one less subterranean parking level than the Project. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. Like the Project, Alternative 3 would be subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. Accordingly, due to less excavation, the impact on tribal cultural resources under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

¹² The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 3.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. This demand would be less than for the Project due to the reduction in construction activities and duration. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 3 would also be expected to be met by the City's available water supplies.

Furthermore, as with the Project, the construction of new on-site water distribution lines to serve the new buildings would be required. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a CTM Plan, similar to the Project, would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, the impact on water supply and infrastructure associated with short-term construction activities under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 3 would generate an increased demand for water relative to existing conditions. However, based on the reduction in total development, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. Additionally, like the Project, Alternative 3 would include a project design feature similar to WAT-PDF-1 to reduce water demand. Therefore, as with the Project, the estimated water demand under Alternative 3 would not exceed the available supplies projected by LADWP. Furthermore, the estimated water demand under Alternative 3 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water

distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be less than the water demand generated by the Project. Moreover, similar to the Project, the Alternative 3 would include the construction of the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new building. Therefore, the operational impact on water supply under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, the impact on energy infrastructure associated with short-term construction activities under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 3 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, the operational impact on energy infrastructure under Alternative 3 would be less than significant, and less than the Project's less-than-significant impact.

3. Comparison of Impacts

As evaluated above, 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.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would include the same components as the Project but the residential density would be reduced by approximately 30 percent and total floor area would be reduced by 40 percent. As such, Alternative 3 would meet Objective 8 to a greater extent than the Project because a smaller development is proposed:

8. Design the residential building to minimize, to the extent feasible, (a) the impact on views from the residential buildings to the north and west of the Project Site and (b) the privacy of project residents and residents to the north and west of the Project Site within their residential units.

Alternative 3 would meet Objectives 5, 7, 9, and 10 to the same extent as the Project because the cathedral would be preserved, parking would be located underground, and the multi-purpose room would be located in roughly the same location:

5. Preserve and rehabilitate the historic cathedral building at its approximate current location in a manner that would not materially impair the significance of the historical resource and would meet the current needs of Our Lady of Mt. Lebanon.
7. Implement a Project design that is compatible with the building design, configuration and location of the historic cathedral and provides a compatible transition from the cathedral to the residential building.
9. Include underground parking for Project uses to provide an appropriate visual separation and transition in massing between, and preserve the design integrity of the respective Project buildings.
10. Locate the multi-purpose room on the same level as, and the other ancillary church space in close proximity to, the cathedral to allow the cohesive and efficient functioning of the church facilities.

Alternative 3 would meet a portion of the underlying purpose of the Project to introduce a residential use to allow for the fulfillment of Our Lady of Mt. Lebanon's mission now and in the future. However, it would only partially meet the balance of the underlying purpose, which is to modernize and expand Our Lady of Mt. Lebanon's existing church facilities, while preserving the historic cathedral, to allow for the fulfillment of Our Lady of Mt. Lebanon's mission now and in the future.

Alternative 3 would partially meet, or meet to a lesser extent, the Project's other residential objectives because it includes no affordable housing, substantially fewer residential units, and a substantially smaller building for the ancillary church uses:

1. Consistent with Mayor Eric Garcetti's goal in Executive Directive 13 of providing 100,000 affordable housing units by 2021, the Density Bonus Ordinance, the Housing Element of the City's General Plan, and the Wilshire Community Plan, provide a substantial number of new housing units to help meet the significant, unmet demand for market-rate and affordable housing in the Project vicinity and the City.
2. Develop a residential building that will generate sufficient revenue for Our Lady of Mt. Lebanon to ensure its long-term survival.
3. Provide housing near transit stations, transit corridors, and substantial retail/commercial areas and medical facilities, to allow a range of transit options for residents and reduce vehicle miles traveled (VMT) by residents, which results in associated reductions in air pollutants and greenhouse gas emissions.
4. Maintain and enhance the religious presence and operation of the church on the site that has been the home of Our Lady of Mt. Lebanon for more than 50 years, including the retention and expansion of its faith-based programs and charitable ministry.
6. Replace the existing and outdated ancillary church space with modern and expanded ancillary church facilities to allow Our Lady of Mt. Lebanon to meet the growing needs of its parishioners and the Maronite community.

V. Alternatives

D. Alternative 4: Modified Design Alternative

1. Description of the 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. As shown in Figure V-3 and Figure V-4 on pages V-62 and V-63, 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 resulting in a consistent building height, including a 142 building height adjacent to 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.



Figure V-3
Modified Design Alternative



Figure V-4
Modified Design Alternative

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 4 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 4, because the overall amount of construction would be the same as the Project, the number of truck trips would also be similar to the Project. In addition, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. As maximum daily conditions are used for measuring impact significance, regional and localized construction impacts under Alternative 4 on these days would be similar to the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 4 would also be the same as those of the Project because the Project footprint and number of subterranean levels for Alternative 4 would remain the same as for the Project. Therefore, the construction impact due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project Site and the consumption of

electricity and natural gas. Development of Alternative 4 would result the same number of daily trips as the Project (580 daily trips¹³). As vehicular emissions depend on the number of trips, vehicular sources would therefore not increase air emissions when compared to the Project. In addition, because Alternative 4 would include the same types and amounts of uses, demand for electricity and natural gas would be similar to the Project. Therefore, the impact associated with regional operational emissions under Alternative 4 would be less than significant and similar to the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, because Alternative 4 would include the same types and amounts of uses, localized impacts from on-site emission sources associated with Alternative 4 would also be less than significant, and similar to the Project's less-than-significant impact. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. Therefore, the operational impact under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers). However, the uses associated with the Project, and similarly with Alternative 4, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not part of the Project or Alternative 4. Similar to the Project, Alternative 4 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Therefore, the operational TAC impact under Alternative 4 would be less than significant, and similar to that of the Project's less-than-significant impact.

b. Cultural Resources

As with the Project, Alternative 4 would also include the deconstruction, reassembly, and limited alteration of the existing cathedral, which is eligible for designation as a Los Angeles HCM. However, the massing of the new building would overwhelm the cathedral building, providing no meaningful transition between the 19-story residential building and

¹³ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 4.

the one-story cathedral. As shown in Figures V-3 and V-4, the residential building would loom directly over the cathedral, without the low-rise ancillary church building between them to allow a transition from the cathedral to the residential building and to preserve the cathedral's integrity of feeling and setting. This significant diminishment in the integrity of feeling and setting of the cathedral building, when combined with the previous diminishment in the integrity of design, workmanship and materials of the cathedral as a result of prior alterations, as well as the further diminishment in the integrity of design, workmanship and materials associated with the deconstruction, reassembly, rehabilitation and limited further alteration of the cathedral as part of Alternative 4, would materially impair the significance of the cathedral such that it would no longer be eligible for designation as a Los Angeles HCM. Therefore, the direct impact on historical resources under Alternative 4 would be significant and unavoidable, which is greater than the Project's less-than-significant impact. With respect to indirect impacts, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no other historical resources within 0.25 mile of the Project Site. Since there are no historical resources in the immediate vicinity of the Project Site, similar to the Project, Alternative 4 would not result in any significant indirect impact to any adjacent historical resource.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. As Alternative 4 would include the same building footprint and number of subterranean levels as the Project, the same amount of grading, excavation and export would be required, resulting in similar levels of energy consumption. In addition, LADWP has confirmed that the supply in the Project area would have the capacity to serve the Project during construction, so that adequate capacity also exists for Alternative 4. Furthermore, as with the Project, through compliance with regulatory requirements, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, similar to the Project, the impact on energy resources associated with short-term construction activities under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. Alternative 4 would result in the same number of daily vehicle trips as the Project (i.e., 580 daily trips¹⁴). Therefore, the associated consumption of petroleum-based fuels under Alternative 4 would be similar to the Project. Accordingly, under Alternative 4, the total energy consumption would be similar to the Project. Similar to the Project, Alternative 4 would also implement project design features that would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. Therefore, the operational impact on energy resources under Alternative 4 would be less than significant, and less than the Project's less-than-significant impact.

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

Like the Project, Alternative 4 would comply with Title 24 requirements for "Solar Ready Buildings" which requires a certain area of rooftop to be set aside for installation of solar panels and would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site's location, other on-site renewable energy sources would not be feasible to install as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, wind, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, Alternative 4 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, similar to the Project, Alternative 4 would not conflict with plans for renewable energy or energy efficiency. Alternative 4's impact would be less than significant and similar to the Project's less than significant impact.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 4 would involve a similar mix of land uses as the Project but with a modified design. Therefore, under Alternative 4, the total energy and water consumption would be similar to the Project. In addition, as discussed above, the number

¹⁴ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 4.

of trips generated by Alternative 4 would be similar to the number of trips generated by the Project (i.e., 580 daily trips¹⁵). Thus, the amount of GHG emissions generated by Alternative 4 would be similar to the amount generated by the Project. As with the Project, Alternative 4 would incorporate project design features to reduce GHG emissions similar to GHG-PDF-1, which includes sustainability features above code, and GHG-PDF-2, which prohibits the use of natural gas-fueled fireplaces in the proposed residential units and would be designed to comply with the City's Green Building Ordinance, as applicable. Similar to the Project, Alternative 4 would be a mixed-use development on an urban infill site within a TPA and HQT. Because of Alternative 4's mixed-use nature, location, reduction in VMT, compliance with the City's Green Building Ordinance, and the implementation of appropriate sustainability features, Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans, including the Climate Change Scoping Plan and its subsequent updates, SCAG's RTP/SCS, and the City's Green New Deal. Therefore, the impact related to GHG emissions under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 4, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Such use would be expected to be the same as the Project because Alternative 4 would require the same amount of construction activity. In any event, like the Project, Alternative 4 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. In addition, due to similar excavation activities, the potential for construction activities associated with Alternative 4 to uncover unknown underground storage tanks would be similar to that of the Project. Similarly, the potential to encounter previously unidentified oil wells during construction would be similar to the Project.

¹⁵ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 4.

With respect to the PCE, TCE, and cis-1,2-DCE identified in groundwater and soil vapor samples in the Phase II, like the Project, Alternative 4 would follow the recommendations of the Soil Management Plan that was prepared to address the following: describe specific soil handling controls required to comply with local, state, and federal overseeing agencies; prevent unacceptable exposure to contaminated soil; and prevent the improper disposal of contaminated soil.

Similar to the Project, while asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, Alternative 4 would also comply with relevant regulations and requirements related to asbestos-containing materials and lead-based paint to ensure that impacts would be less than significant. Furthermore, as with the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 4, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. In addition, a temporary dewatering system would be in place during demolition and building construction of Alternative 4, which would reduce impacts associated with methane gas.

With regard to emergency response plans, like the Project, construction activities for Alternative 4 would be primarily confined to the Project Site. Also, similar to the Project, construction of Alternative 4 would not close or block access to any properties in the vicinity of the Project Site.

Based on the above, the construction-related impact associated with hazards and hazardous materials under Alternative 4 would be less than significant, similar to the Project's less-than-significant impact.

(2) Operation

Similar to the Project, Alternative 4 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 4 would not include the installation of underground or aboveground storage tanks. The operation of Alternative 4 would involve the limited use of potentially hazardous materials typical of those used in developments such as Alternative 4, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be similar to the Project. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements.

With respect to the PCE, TCE, and cis-1,2-DCE identified in groundwater and soil vapor samples in the Phase II, like the Project, development of Alternative 4 would not exacerbate the potential impact of this existing groundwater and soil contamination on future residents. The MCLs identified in the Phase II are drinking water standards, and

future residents would not be exposed to or drink the groundwater. Moreover, as explained in the methane discussion below, the proposed mat foundation and retaining walls for the subterranean parking structure would be designed and waterproofed to for an undrained condition that would withstand hydrostatic forces and thereby prevent methane intrusion. This methane barrier would be equally effective in preventing the intrusion of soil vapors.

As with the Project, Alternative 4 would also comply with the City's Methane Mitigation Ordinance No. 175790. Based on the City's methane mitigation requirements therein, the Project Site is considered to be Design Level V. Similar to the Project, Alternative 4 would include an alternative methane mitigation system designed by an architect, engineer or geologist that is equivalent to providing a permanent dewatering system and related mitigation as described in the City's methane mitigation requirements (LAMC Section 91.7104) and the proposed mat foundation would be designed and waterproofed to for an undrained condition that would withstand hydrostatic forces and thereby prevent methane intrusion.

Based on the above, the impact related to hazards and hazardous materials during operation of Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

f. Land Use

Alternative 4 would involve the same uses as the Project but with a reconfigured plan. Like the Project, this Alternative 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. Alternative 4 would also include 16,800 square feet of open space, similar to the Project. Alternative 4 would include the residential uses in a 12-story residential building up to approximately 142 feet, as compared to a 19-story, 225-foot-high residential building for the Project. In order to maintain the same number of proposed residential units, 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 ancillary church building would be similar to the Project. Like the Project, a total of 397 vehicle parking spaces would be provided within five subterranean parking levels, with access provided by a driveway along the publicly accessible alley that abuts the Project Site to the north. Alternative 4 would require the same entitlements as the Project. With approval of the requested discretionary actions and implementation of design features comparable to those of the Project, Alternative 4 would be not conflict with the overall intent of applicable policies and objectives in local and regional plans that govern development on the Project Site, including the City's General Plan, the Community Plan, and the LAMC. Therefore, the

impact related to land use conflicts under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

g. Noise

(1) Construction

Alternative 4 would involve the same general phases of construction as the Project (i.e., demolition, site grading, building construction, and finishing/landscape installation), and would require the same amount of grading, excavation and export as the Project since Alternative 4 would have the same footprint as the Project and would include the same number of subterranean levels. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. On-site construction activities and the associated construction noise and vibration levels would be expected to be similar to the Project. Alternative 4 would also include project design features similar to NOI-PDF-1 through NOI-PDF-4 to reduce construction noise and vibration impacts during construction. Furthermore, like the Project, Alternative 4 would require demolition of the existing non-historic buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 4 would also be similar to those associated with the Project. Alternative 4 would comply with the same applicable regulatory requirements and implement similar project design features (NOI-PDF-1 through NOI-PDF-4, as noted above) and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance during construction including Mitigation Measure NOI-MM-1, which requires the installation of a temporary sound barrier. As with the Project, construction of Alternative 4 would result in significant and unavoidable impacts with respect to on-site noise and vibration during construction, as well as significant and unavoidable cumulative off-site noise impacts.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the mat foundation phase. Alternative 4 would require the same extent of site excavation and soil export necessary as the Project, and would require the same number of construction haul trucks and, thereby, truck trips. Temporary noise and vibration impacts (pursuant to the threshold for building damage) from off-site construction traffic generated by Alternative 4 would also be less than significant and similar to the impacts of the Project. However, like the Project, vibration created by construction trucks traveling along the proposed haul route could exceed the threshold of significance for human annoyance for sensitive uses. Therefore, similar to the Project, it is conservatively assumed that temporary and intermittent off-site vibration impacts (pursuant to the threshold for human annoyance) under Alternative 4 would be significant and unavoidable, similar to the Project's significant-and-unavoidable impacts.

In addition, similar to the Project, Alternative 4 would result in significant cumulative on-site and off-site construction noise and off-site vibration impacts related to human annoyance, similar to the Project's significant cumulative impacts.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 4 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). Alternative 4 would also implement a project design feature similar to NOI-PDF-5 to limit the noise level of any outdoor amplified sound systems. In addition, under Alternative 4, the proposed loading dock and trash collection areas would be enclosed and located within the building, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Specifically, like the Project, simultaneous operation of the two loading docks under Alternative 4 would result in a significant impact at receptor location R1. Outdoor noise sources associated with open space areas would be similar to the Project because these areas would include the same uses and would be located at similar distances from sensitive receptors as the Project. Alternative 4 would include the same amount of vehicle parking spaces as the Project. In addition, because the parking levels would be fully enclosed, potential noise associated with parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 4 would be substantially similar to those of the Project. As such, due to the simultaneous loading dock operations across the alley from sensitive receptor R1, the on-site operational noise impact under Alternative 4 would be significant and unavoidable, similar to the Project's significant-and-unavoidable impact.

As discussed above, Alternative 4 would result in the same amount of daily vehicle trips as the Project (i.e. 580 daily trips¹⁶). Accordingly, the off-site noise impact associated with traffic would be less than significant, similar than the Project's less-than-significant impact.

¹⁶ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 4.

h. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the Project, construction of Alternative 4 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities of Alternative 4 to expose people to the risk of fire or explosion related to hazardous materials.

In addition, similar to the Project, a CTM Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, because the amount and duration of construction would be the same, the construction-related impact on fire protection services under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Operation

Alternative 4 would include the same components as the Project, including 153 residential units, the deconstruction, reassembly, rehabilitation, and limited alteration of the existing cathedral, and approximately 23,649 square feet of ancillary church uses. Alternative 4 would generate a fire service population similar to the Project. Like the Project, Alternative 4 would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9), the Fire Code (Chapter 7) and Section 57.507.3.1 regarding fire flow requirements. As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates that adequate hydrant pressure and flow is not currently available at the Project Site. Therefore, like the Project, Alternative 4 would include necessary upgrades to improve the surrounding water infrastructure that would facilitate flow and pressure requirements, but those upgrades would be limited to increasing the fire flow of two hydrants and would not be substantial. Thus, as with the Project, Alternative 4 would not result in the need for new or physically altered fire protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on fire protection services under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 4 would be similar to those of the Project. Alternative 4 would include a project design feature similar to POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a CTM Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, the construction-related impact on police protection services under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Operation

Alternative 4 would include the same components as the Project, including 153 residential units, the deconstruction, reassembly, rehabilitation, and limited alteration of the existing cathedral, and approximately 23,649 square feet of ancillary church uses. Alternative 4 would generate a police service population similar to the Project. Like the Project, Alternative 4 would include project design features similar to POL-PDF-2 through POL-PDF-6, which include a 24-hour camera network, on-site security, appropriate lighting to ensure security, the prevention of concealed spaces, and coordination with LAPD. The project design features would help offset the increase in demand for police protection services generated by Alternative 4 by reducing the number of calls for police protection services. Thus, as with the Project, Alternative 4 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on police protection services under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(3) Libraries

(a) Construction

Similar to the Project, construction of Alternative 4 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by

Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, the impact on library facilities and services during construction of Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 4 would generate a new residential population from the construction of 153 dwelling units on the Project Site, which could create the same demand for library facilities and services. The number of church employees associated with Alternative 4 would be same as the Project, and the number of employees under either scenario would be the same as the number of existing church employees. As such, the operational impact on library facilities and services under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

i. Transportation

As discussed above, Alternative 4 would include the same components as the Project and would be developed within the same footprint and provide the same number of subterranean levels as the Project. Using the City's VMT calculator, the proposed uses for Alternative 4 would result in a total on-site population of 345 persons and 580 daily vehicle trips,¹⁷ the same as the Project. As such, the impact to transit, bicycle, and pedestrian facilities would be similar to the Project's less-than-significant impact. As discussed below, the impact with respect to VMT would be less than significant like the Project. Therefore, the impacts under Alternative 4 associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than significant, and similar to the Project's less-than-significant impact.

¹⁷ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 3.

With respect to VMT, accounting for the same project design features as the Project and including the implementation of Mitigation Measure TR-MM-1, Alternative 4 would generate 3,312 daily VMT, the same as the Project. As detailed in the TAG, because, like the Project, Alternative 4 would not include office or commercial uses, the VMT per employee for these uses was not considered for purposes of identifying significant work VMT impacts. Thus, based on the population assumptions, Alternative 4 would generate an average household VMT of 5.8 per capita, which is the same as the Project and would fall below the significance threshold for the Central APC of 6.0. Therefore, the impact under Alternative 4 with respect to conflicts with CEQA Guidelines Section 15064.3(b) would be less than significant, and similar to the Project's less-than-significant impact.

j. Tribal Cultural Resources

Alternative 4 would include the same number of subterranean parking levels as the Project. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be similar to the Project. Like the Project, Alternative 4 would be subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. Accordingly, the impact on tribal cultural resources under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar the Project, construction activities associated with Alternative 4 would generate a short-term demand for water. This demand would be similar to the Project as the same amount and duration of construction that would be required under Alternative 4. This demand would also be less than the existing condition. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be similar to the Project, the temporary and intermittent demand for water during construction under Alternative 4 would also be expected to be met by the City's available water supplies.

Furthermore, as with the Project, the construction of new on-site water distribution lines to serve the new buildings would be required. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance, Project

contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a CTM Plan, similar to the Project, would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, the impact on water supply and infrastructure associated with short-term construction activities under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Operation

As with the Project, 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, which would result in the same net water demand generated by the Project. Additionally, like the Project, Alternative 4 would include a project design feature similar to WAT-PDF-1 to reduce water demand. Therefore, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Furthermore, the estimated net water demand under Alternative 4 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 4 since the water demand would be similar to the Project. Moreover, similar to the Project, Alternative 4 would include construction of the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new building under Alternative 4. Therefore, the operational impact on water supply under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be similar to the Project because Alternative 4 would require the same overall amount of construction and duration of construction. Therefore, the impact on energy infrastructure associated with short-term construction activities under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. Because the same amount and types of uses are proposed, the consumption of electricity and natural gas under Alternative 4 would be the same as the Project, and the corresponding impact on energy infrastructure would be the same as the Project. Therefore, the operational impact on energy infrastructure under Alternative 4 would be less than significant, and similar to the Project's less-than-significant impact.

3. Comparison of Impacts

As evaluated above, 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.

4. Relationship of the Alternative to Project Objectives

Alternative 4 would include the same components as the Project but with a reconfigured plan that spreads the massing of a single new building across the Project Site. Alternative 4 would meet a portion of the underlying purpose of the Project to introduce a residential use to allow for the fulfillment of the cathedral's mission now and in the future. However, it would only partially meet the balance of the underlying purpose, which is to modernize and expand Our Lady of Mt. Lebanon's existing church facilities, while preserving the historic cathedral, to allow for the fulfillment of Our Lady of Mt. Lebanon's mission now and in the future because the massing of the new building would overwhelm the cathedral building, providing no meaningful transition between the residential building and the cathedral, and thereby significantly diminish the cathedral's integrity of setting and feeling.

The significant diminishment in the integrity of feeling and setting of the cathedral building, when combined with the previous diminishment in the integrity of design, workmanship and materials of the cathedral as a result of prior alterations, as well as the further diminishment in the integrity of design, workmanship and materials associated with the deconstruction, reassembly, rehabilitation and limited further alteration of the cathedral as part of Alternative 4 (the same as the Project), would materially impair the significance

of the cathedral such that it would no longer be eligible for designation as a Los Angeles HCM. As a result, Objective 5 would not be met. In addition, Alternative 4 would not meet Objectives 7 and 8 because the massing of the new building would overwhelm the cathedral building, and entirely block southerly views from the 11-story condominium building to the north and easterly views from the five-story, multi-family condominium to the west across Holt Avenue, which would in turn minimize the privacy of residents to the north and west of the Project Site:

5. Preserve and rehabilitate the historic cathedral building at its approximate current location in a manner that would not materially impair the historic significance of the cathedral and would meet the current needs of Our Lady of Mt. Lebanon.
7. Implement a Project design that is compatible with the building design, configuration and location of the historic cathedral and provides a compatible transition from the cathedral to the residential building.
8. Design the residential building to minimize, to the extent feasible, (a) the impact on views from the residential buildings to the north and west of the Project Site and (b) the privacy of project residents and residents to the north and west of the Project Site within their residential units.

Alternative 4 would meet the other residential objectives and church objectives to the same extent as the Project because Alternative 4 would include the same components as the Project:

1. Consistent with Mayor Eric Garcetti's goal in Executive Directive 13 of providing 100,000 affordable housing units by 2021, the Density Bonus Ordinance, the Housing Element of the City's General Plan, and the Wilshire Community Plan, provide a substantial number of new housing units to help meet the significant, unmet demand for market-rate and affordable housing in the Project vicinity and the City.
2. Develop a residential building that will generate sufficient revenue for Our Lady of Mt. Lebanon to ensure its long-term survival.
3. Provide housing near transit stations, transit corridors, and substantial retail/commercial areas and medical facilities, to allow a range of transit options for residents and reduce vehicle miles traveled (VMT) by residents, which results in associated reductions in air pollutants and greenhouse gas emissions.
4. Maintain and enhance the religious presence and operation of the church on the site that has been the home of Our Lady of Mt. Lebanon for more than 50 years,

- including the retention and expansion of its faith-based programs and charitable ministry.
6. Replace the existing and outdated ancillary church space with modern and expanded ancillary church facilities to allow Our Lady of Mt. Lebanon to meet the growing needs of its parishioners and the Maronite community.
 9. Include underground parking for Project uses to provide an appropriate visual separation and transition in massing between , and preserve the design integrity of the respective Project buildings.
 10. Locate the multi-purpose room on the same level as, and the other ancillary church space in close proximity to, the cathedral to allow the cohesive and efficient functioning of the church facilities.

V. Alternatives

E. Alternative 5: Reduced Grading Alternative

1. Description of the 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-a-half subterranean levels and five above-grade levels, as compared to five subterranean levels for the Project.¹⁸ As shown in Figure V-5 and Figure V-6 on pages V-82 and V-83, 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.

¹⁸ *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.*



Figure V-5
Reduced Grading Alternative



Figure V-6
Reduced Grading Alternative

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.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 5 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 5, because the overall amount of construction would be reduced in comparison to the Project, the number of truck trips would also be reduced in comparison to the Project and excavation for subterranean parking would be reduced from five to two and a half. In addition, 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 impact significance, regional and localized construction impacts on these days under Alternative 5 would be similar to the Project’s less-than-significant impact.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 5 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 5 would be less than those of the Project because Alternative 5 would require fewer truck trips and less excavation for subterranean parking levels. Therefore, the construction impact due to TAC emissions and the corresponding individual cancer risk under Alternative 5 would be less than significant, and less than the Project's less-than-significant impact.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 5 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. Development of Alternative 5 would result in fewer daily trips than the Project (i.e., 568 under Alternative 5 vs 580 with the Project¹⁹). As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, the impact associated with regional operational emissions under Alternative 5 would be less than significant and less than the Project's less-than-significant impact.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 5 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 5 would also be less than significant. Localized mobile source operational impacts are determined mainly by peak-hour intersection traffic volumes. Therefore, the operational impact under Alternative 5 would be less than significant and less than the Project's less-than-significant impact.

¹⁹ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 5.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and, to a lesser extent, facility operations (e.g., natural gas fired boilers). However, the uses associated with the Project, and similarly with Alternative 5, are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not part of the Project or Alternative 5. Similar to the Project, Alternative 5 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Therefore, the operational TAC impact under Alternative 5 would be less than significant and similar to the Project's less-than-significant impact.

b. Cultural Resources

As with the Project, Alternative 5 would include the deconstruction, reassembly, rehabilitation, and limited alteration of the existing cathedral building. However, as shown in Figures V-5 and V-6, the massing of the six-story podium structure would overwhelm the immediately adjacent, one-story cathedral building, providing no meaningful height and massing transition between the residential building and the cathedral, and thereby significantly diminish the cathedral's integrity of setting and feeling. This significant diminishment in the integrity of setting and feeling of the cathedral building, when combined with the previous diminishment in the integrity of design, workmanship, and materials of the cathedral as a result of prior alterations, as well as the further diminishment in the integrity, design, workmanship, and materials associated with the deconstruction, reassembly, rehabilitation, and limited further alteration of the cathedral as part of Alternative 5 would materially impair the significance of the cathedral such that it would no longer be eligible for designation as a Los Angeles HCM. Therefore, the direct impact on historical resources under Alternative 5 would be significant and unavoidable, which is greater than the Project's less-than-significant impact. With respect to indirect impacts, as discussed in Section IV.B, Cultural Resources, of this Draft EIR, there are no other historical resources within 0.25 mile of the Project Site. Since there are no historical resources in the immediate vicinity of the Project Site, similar to the Project, Alternative 5 would not result in any significant indirect impact to any adjacent historical resource.

c. Energy

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

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. In addition, LADWP has confirmed that the supply in the Project area would have the capacity to serve the Project Site during construction, so that adequate capacity exists for Alternative 5, which requires less grading activity. Furthermore, as with the Project, through compliance with regulatory requirements, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources. Therefore, the impact on energy resources associated with short-term construction activities under Alternative 5 would be less than significant and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 5 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. In addition, as previously discussed, Alternative 5 would result in fewer daily vehicle trips as the Project (i.e., 568 under Alternative 5 vs. 580 with the Project²⁰). Therefore, the associated consumption of petroleum-based fuels under Alternative 5 would be similar to the Project. Under Alternative 5, the total energy consumption would be slightly less than the Project due to the reduced building size. Similar to the Project, Alternative 5 would implement project design features that would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 5 would not be wasteful, inefficient, or unnecessary. Therefore, the operational impact on energy resources under Alternative 5 would be less than significant, and less than the Project's less-than-significant impact.

²⁰ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 5.

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

Like the Project, Alternative 5 would comply with Title 24 requirements for “Solar Ready Buildings” which requires a certain area of rooftop to be set aside for installation of solar panels and would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Site’s location, other on-site renewable energy sources would not be feasible to install as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal solid waste, wind, ocean thermal, ocean wave, and tidal current technologies, or multi-fuel facilities using renewable fuels. Furthermore, Alternative 5 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, similar to the Project, Alternative 5 would not conflict with plans for renewable energy or energy efficiency and the impact would be less than significant.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 5 would involve a similar mix of land uses as the Project but total development would be reduced by approximately 4,014 square feet. Therefore, under Alternative 5, the total energy and water consumption would be slightly less than the Project. In addition, as discussed above, the number of trips generated by Alternative 5 would be less than the number of trips generated by the Project (i.e., 568 under Alternative 5 vs. 580 with the Project²¹). Thus, the amount of GHG emissions generated by Alternative 5 would be less than the amount generated by the Project. As with the Project, Alternative 5 would incorporate project design features to reduce GHG emissions similar to GHG-PDF-1, which includes sustainability features above code, and GHG-PDF-2, which prohibits the use of natural gas-fueled fireplaces in the proposed residential units and would be designed to comply with the City’s Green Building Ordinance, as applicable. Similar to the Project, Alternative 5 would be a mixed-use development on an urban infill site within a TPA and HQT. Because of Alternative 5’s mixed-use nature, location, reduction in VMT, and compliance with the City’s Green Building Ordinance and the implementation of appropriate sustainability features, that Alternative 5 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans including the Climate Change Scoping Plan and its subsequent updates, SCAG’s RTP/SCS, and the City’s Green New Deal. Therefore, the impact related to GHG

²¹ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 5.

emissions under Alternative 5 would be less than significant, and less than the Project's less-than-significant impact.

e. Hazards and Hazardous Materials

(1) Construction

Similar to the Project, during demolition, on-site grading, and building construction associated with Alternative 5, fuel and oils associated with construction equipment, as well as coatings, paints, adhesives, and caustic or acidic cleaners would be used, handled, and stored on the Project Site, and would therefore require proper management and disposal. Such use would be expected to be reduced in comparison to the Project due to the reduction in the overall amount of construction and duration of construction under Alternative 5. Notwithstanding, like the Project, Alternative 5 would fully comply with all applicable federal, state, and local requirements, as well as the manufacturer's instructions concerning the use, handling, storage, and disposal of hazardous materials.

As discussed in detail in Section IV.E, Hazards and Hazardous Materials, of this Draft EIR, according to the Phase I ESA, during the Project Site reconnaissance, no evidence of existing underground storage tanks or aboveground storage tanks were observed on the Project Site. In addition, the potential for construction activities associated with this alternative to uncover unknown underground storage tanks would be similar to that of the Project due to similar excavation activities. Similarly, the potential to encounter previously unidentified oil wells during construction would be similar to the Project.

With respect to the PCE, TCE, and cis-1,2-DCE identified in groundwater and soil vapor samples in the Phase II, as is the case with the Project, Alternative 5 would follow the recommendations of the Soil Management Plan that was prepared to address the following: describe specific soil handling controls required to comply with local, state, and federal overseeing agencies; prevent unacceptable exposure to contaminated soil; and prevent the improper disposal of contaminated soil.

Similar to the Project, while asbestos-containing materials and lead-based paints may be present on-site due to the age of the existing buildings, Alternative 5 would also comply with relevant regulations and requirements related to asbestos-containing materials and lead-based paint to ensure that impacts would be less than significant. Furthermore, as with the Project, in the event that PCBs are found within areas proposed for demolition during construction of Alternative 5, suspect materials would be removed in accordance with all applicable federal, state, and local regulations. In addition, a temporary dewatering system would be in place during demolition and building construction of Alternative 5, which would reduce impacts associated with methane gas.

Based on the above, due to the reduced construction activities, the construction-related impact associated with hazards and hazardous materials under Alternative 5 would be less than significant and less than the Project's less-than-significant impact.

(2) Operation

Similar to the Project, Alternative 5 would not include the use of materials that would contain asbestos, lead based paint, or PCBs. In addition, Alternative 5 would not include the installation of underground or aboveground storage tanks. The operation of Alternative 5 would involve the limited use of potentially hazardous materials typical of those used in developments such as Alternative 5, including cleaning agents, paints, pesticides, and other materials used for landscaping. Such use would be reduced compared to the Project due to the reduction in uses. In addition, as with the Project, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all manufacturers' specifications and all applicable federal, state, and local requirements.

With respect to the PCE, TCE, and cis-1,2-DCE identified in groundwater and soil vapor samples in the Phase II, like the Project, development of Alternative 5 would not exacerbate the potential impact of this existing groundwater and soil contamination on future residents. The MCLs identified in the Phase II are drinking water standards, and future residents would not be exposed to or drink the groundwater. Moreover, as explained in the methane discussion below, the proposed mat foundation and retaining walls for the subterranean parking structure would be designed and waterproofed to for an undrained condition that would withstand hydrostatic forces and thereby prevent methane intrusion. This methane barrier would be equally effective in preventing the intrusion of soil vapors.

As with the Project, Alternative 5 would also comply with the City's' Methane Mitigation Ordinance No. 175790. Based on the City's methane mitigation requirements therein, the Project Site is considered to be Design Level V. Similar to the Project, Alternative 5 would include an alternative methane mitigation system designed by an architect, engineer or geologist that is equivalent to providing a permanent dewatering system and related mitigation as described in the City's methane mitigation requirements (LAMC Section 91.7104) and the proposed mat foundation would be designed and waterproofed to for an undrained condition that would withstand hydrostatic forces and thereby prevent methane intrusion.

Based on the above, the impact related to hazards and hazardous materials during operation of Alternative 5 would be less than significant, and similar to the Project's less-than-significant impact.

f. Land Use

Alternative 5 would involve the same uses as the Project, but would provide the parking within two-and-a-half subterranean levels and five above-grade levels as opposed to the five subterranean levels provided for the Project. Like the Project, this Alternative would include 153 residential units, the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral building. It would also include the same ancillary church uses, including offices, meeting rooms, and a 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. This Alternative would also include 16,800 square feet of open space, similar to the Project. Alternative 5 would include the residential uses in a 26-story residential building up to approximately 287 feet, as compared to a 19-story, 225-foot-tall residential building for the Project. Due to design constraints associated with the above-grade parking, the ancillary church space, including the multi-purpose room, would be located above the parking levels and would no longer have immediate proximity 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 be decreased from 475 to 370. 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. Alternative 5 would 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 approval of the requested discretionary actions and implementation of design features comparable to those of the Project, Alternative 5 would be not conflict with the overall intent of applicable policies and objectives in local and regional plans that govern development on the Project Site, including the City’s General Plan, the Community Plan, and the LAMC. Therefore, the impact related to land use consistency under Alternative 5 would be less than significant, and similar to the Project’s less-than-significant impact.

g. Noise

(1) Construction

Alternative 5 would require less grading/excavation than the Project since the number of subterranean levels would be reduced from five to two and a half. As with the Project, construction of Alternative 5 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Alternative 5 would also implement project design features similar to NOI-PDF-1 through NOI-PDF-4 to reduce construction noise and vibration impacts during construction. The amount and the overall duration of construction would be reduced compared to the Project

due to the slight reduction in building area. However, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 5 when compared to the Project. Specifically, the conversion of many below-grade parking spaces to above-grade parking spaces would substantially reduce the duration of the excavation phase, which would lead to an overall decrease in the duration of construction. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those associated with the Project. Furthermore, like the Project, Alternative 5 would require demolition of the existing non-historic buildings on-site. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 5 would also be similar to those associated with the Project. Alternative 5 would comply with the same applicable regulatory requirements and implement similar project design features (NOI-PDF-1 through NOI-PDF-4, as noted above) and mitigation measures as the Project to reduce on-site noise and vibration levels pursuant to the threshold for human annoyance during construction including Mitigation Measure NOI-MM-1, which requires the installation of a temporary sound barrier. As with the Project, construction of Alternative 5 would result in significant and unavoidable impacts with respect to on-site noise and vibration during construction, as well as significant and unavoidable cumulative off-site noise impacts.

As discussed in Section IV.G, Noise, of this Draft EIR, the highest number of construction trucks would occur during the mat foundation phase. Since Alternative 5 would not require the extent of site excavation and soil export necessary under the Project, the number of construction haul trucks and, thereby, trips, would be reduced. Thus, it can be reasonably concluded that temporary noise and vibration impacts (pursuant to the threshold for building damage) from off-site construction traffic generated by Alternative 5 would also be less than significant, and less than the Project's less-than-significant impact. However, although construction haul trucks and trips would be reduced under Alternative 5, vibration created by construction trucks traveling along the proposed haul route could exceed the threshold of significance for human annoyance for sensitive uses. Therefore, it is conservatively assumed that temporary and intermittent off-site vibration impacts (pursuant to the threshold for human annoyance) under Alternative 5 would be significant and unavoidable and similar to the Project's significant and unavoidable impact.

In addition, similar to the Project, Alternative 5 would result in significant cumulative on-site and off-site construction noise and off-site vibration impacts related to human annoyance.

(2) Operation

As described in Section IV.G, Noise, of this Draft EIR, sources of operational noise include: (a) on-site stationary noise sources such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor courtyards, parking facilities, and loading dock/trash collection areas; and (b) off-site mobile (roadway traffic) noise sources. Similar to the Project, on-site mechanical equipment used during operation of Alternative 5 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 decibels (dBA). Alternative 5 would also implement a project design feature similar to NOI-PDF-5 to limit the noise level of any outdoor amplified sound systems. In addition, under Alternative 5, the proposed loading dock and trash collection areas would be enclosed and located within the building, similar to the Project. Thus, noise impacts from mechanical equipment, loading docks, and trash collection areas would also be similar to the Project. Specifically, like the Project, simultaneous operation of the two loading docks under Alternative 5 would result in a significant impact at receptor location R1. Outdoor noise sources associated with open space areas would be similar to the Project because these areas would include the same uses and would be located at similar distances from sensitive receptors as the Project. Alternative 5 would provide 397 vehicle parking spaces, the same as the Project. Since the parking levels would be fully enclosed, potential noise associated with parking facilities would be substantially similar to that of the Project. The overall composite noise levels generated by Alternative 5 would be substantially similar to the Project. As such, due to the simultaneous operation of the loading docks, the on-site operational noise impact under Alternative 5 would be significant and unavoidable, similar to the Project's significant and unavoidable impact.

As discussed above, Alternative 5 would result in slightly fewer daily vehicle trips as the Project (i.e., 568 under Alternative 5 vs. 580 with the Project²²). Accordingly, the off-site noise impact associated with traffic under Alternative 5 would be less than significant, and similar to the Project's less-than-significant impact.

²² The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 5.

h. Public Services

(1) Fire Protection

(a) Construction

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings, and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the Project, construction of Alternative 5 would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous materials. Thus, as with the Project, compliance with regulatory requirements would reduce the potential for construction activities of Alternative 5 to expose people to the risk of fire or explosion related to hazardous materials.

In addition, similar to the Project, a CTM Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, due to the reduction in construction activities and duration, the construction-related impact on fire protection services under Alternative 5 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

Like the Project, this Alternative would include 153 residential units, the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral building. It would also include the same ancillary church uses, including offices, meeting rooms, and a 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. Although the ancillary church uses would be slightly reduced, the number of church employees is not expected to change. Therefore, since the number of residential uses is the same as the Project, Alternative 5 would result in a similar fire service population as the Project. Like the Project, Alternative 5 would comply with LAMC fire safety requirements, including those established in the Building Code (Chapter 9), the Fire Code (Chapter 7) and Section 57.507.3.1 regarding fire flow requirements. As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Fire Flow Availability Report indicates that adequate hydrant pressure and flow is not currently available at the Project Site. Therefore, like the Project, Alternative 5 would include necessary upgrades to improve the surrounding water infrastructure that would facilitate flow and pressure requirements, but those upgrades would be limited to increasing the fire flow of two hydrants and would not be substantial. Thus, as with the Project, Alternative 5 would not result in the need for new or physically altered fire protection facilities, the construction of

which would cause significant environmental impacts, in order to maintain service. As such, the impact on fire protection services under Alternative 5 would be less than significant, and similar to the Project's less-than-significant impact.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 5 would be similar to those of the Project. However, the overall amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Specifically, the conversion of many below-grade parking spaces to above-grade parking spaces would substantially reduce the duration of the excavation phase, which would lead to an overall decrease in the duration of construction. Alternative 5 would also include a project design feature similar to POL-PDF-1, which includes temporary security measures such as security fencing, lighting, locked entry to secure the Project Site during construction, and regular security patrols during non-construction hours, thereby reducing the demand for police protection services.

In addition, similar to the Project, a CTM Plan would be implemented to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, due to the reduction in construction activities and duration, the construction-related impact on police protection services under Alternative 5 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

Like the Project, this Alternative would include 153 residential units, the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral building. It would also include the same ancillary church uses, including offices, meeting rooms, and a 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. Like the Project, Alternative 5 would include project design features similar to POL-PDF-2 through POL-PDF6, which include a 24-hour camera network, on-site security, appropriate lighting to ensure security, the prevention of concealed spaces, and coordination with LAPD. The design features would help offset the increase in demand for police protection services generated by Alternative 5 by reducing the number of calls for police protection services. Thus, as with the Project, Alternative 5 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. As such, the impact on police protection services under Alternative 5 would be less than significant, similar to the Project's less-than-significant impact.

(3) Libraries

(a) Construction

Similar to the Project, construction of Alternative 5 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 5 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, the impact on library facilities and services during construction of Alternative 5 would be less than significant, and similar to the Project's less-than-significant impact.

(b) Operation

Residents are considered the primary users of library facilities. As with the Project, Alternative 5 would generate a new residential population from the construction of 153 dwelling units on the Project Site, which could create the same demand for library facilities and services as the Project. The number of church employees associated with Alternative 5 would be same as the Project, and the number of employees under either scenario would be the same as the number of existing church employees. As such, the operational impact under Alternative 5 would be less than significant and similar to the Project's less-than-significant impact.

i. Transportation

As discussed above, Alternative 5 would include 176,766 square feet of uses on the Project Site compared to the Project's 180,080 square feet of uses, but would still include the same components as the Project and would result in the same on-site population as the Project. Specifically, using the City's VMT calculator, the proposed uses for Alternative 5

would result in a total on-site population of 345 persons, to the same as the Project. Daily vehicle trips would, however, be slightly less than for the Project (i.e., 568 under Alternative 5 vs. 580 with the Project²³). Because the on-site population would be the same, the impact to transit, bicycle, and pedestrian facilities would be similar to the Project's less-than-significant impact. As discussed below, the impact with respect to VMT under Alternative 5 would be less than significant, similar to the Project. Therefore, the impacts under Alternative 5 associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be similar to the Project's less-than-significant impact.

With respect to VMT, accounting for the same project design features as the Project and implementation of Mitigation Measure TR-MM-1, Alternative 5 would generate 3,235 daily VMT compared to 3,312 daily VMT with the Project. As detailed in the TAG, because, like the Project, Alternative 5 would not include office or commercial uses, the VMT per employee for these uses was not considered for purposes of identifying significant work VMT impacts. Thus, based on the population assumptions, Alternative 5 would generate an average household VMT of 5.8 per capita, which would fall below the significance threshold for the Central APC of 6.0. Therefore, the impact under Alternative 5 with respect to conflicts with CEQA Guidelines Section 15064.3(b) would be less than significant, and similar to the Project's less-than-significant impact.

j. Tribal Cultural Resources

Alternative 5 would include two-and-a-half subterranean levels, compared to the five subterranean levels for the Project. Therefore, the potential for Alternative 5 to uncover subsurface tribal cultural resources would be less than for the Project. Like the Project, Alternative 5 would be subject to the City's standard condition of approval for the inadvertent discovery of tribal cultural resources. Accordingly, due to less excavation, the impact on tribal cultural resources would be less than significant, and less than the Project's less-than-significant impact.

²³ The number of trips includes implementation of Mitigation Measure TR-MM-1 for the both the Project and Alternative 5.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would generate a short-term demand for water. This demand would be slightly less than the Project because total floor area would be reduced by approximately 4,014 square feet under Alternative 5. This demand would also be less than existing conditions. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be similar to the Project, the temporary and intermittent demand for water during construction under Alternative 5 would also be expected to be met by the City's available water supplies.

Furthermore, as with the Project, the construction of new on-site water distribution lines to serve the new buildings would be required. The connections and installation of on-site water distribution lines would primarily involve on-site trenching to place the lines below the surface and minor off-site trenching to connect to the existing public water mains or existing meter lateral locations. As with the Project, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a CTM Plan, similar to the Project, would be implemented to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, the impact on water supply and infrastructure associated with short-term construction activities under Alternative 5 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, Alternative 5 would include 153 residential units, the deconstruction, reassembly, rehabilitation and limited alteration of the existing cathedral building, but the approximately 20,335 square feet of ancillary church uses would be less than for the Project because Alternative 5 would reduce the size of the multi-purpose room to approximately 9,286 square feet. As a result, water demand for Alternative 5 would be slightly less than the Project. Additionally, like the Project, Alternative 5 would include a project design feature similar to WAT-PDF-1 to reduce water demand. Therefore, similar to the Project, the estimated water demand for Alternative 5 would not exceed the available

supplies projected by LADWP. Furthermore, like the Project, the estimated net water demand under Alternative 5 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, like the Project, the existing water distribution infrastructure would be adequate to serve Alternative 5 since the water demand would be lower than the Project and the Project Site's existing uses. Moreover, similar to the Project, Alternative 5 would include the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 5 to accommodate the new building. Therefore, the operational impact on water supply under Alternative 5 would be less than significant, and less than the Project's less-than-significant impact.

(2) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 5 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be less than the Project because Alternative 5 would require less overall amount of construction. Specifically, the conversion of many below-grade parking spaces to above-grade parking spaces would substantially reduce the duration of the excavation phase, which would lead to an overall decrease in the duration of construction. Therefore, impact on energy infrastructure associated with short-term construction activities under Alternative 5 would be less than significant, and less than the Project's less-than-significant impact.

(b) Operation

As with the Project, the operation of Alternative 5 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 5 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, the operational impact on energy infrastructure under Alternative 5 would be less than significant and less than the Project's less-than-significant impact.

3. Comparison of Impacts

As evaluated above, 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.

4. Relationship of the Alternative to Project Objectives

Alternative 5 would include the same components as the Project, but two-and-a-half of the five subterranean parking levels would be replaced with five above-grade parking levels. This requires the construction of an eight-level, 106-foot-tall podium between the primary volume of the residential building and the cathedral building. This places the podium structure adjacent to the low-scale cathedral.

As a result, Alternative 5 would meet a portion of the underlying purpose of the Project to introduce a residential use to allow for the fulfillment of the cathedral's mission now and in the future. However, it would only partially meet the balance of the underlying purpose, which is to modernize and expand Our Lady of Mt. Lebanon's existing church facilities, while preserving the historic cathedral, to allow for the fulfillment of Our Lady of Mt. Lebanon's mission now and in the future because the massing of the podium structure would overwhelm the cathedral building, providing no meaningful transition between the residential building and the cathedral, and thereby significantly diminish the cathedral's integrity of setting and feeling. As discussed below, that would not preserve the cathedral from a historic preservation standpoint.

In addition, Alternative 5 would not meet Objectives 5, 7, and 8 because the massing of the new building would overwhelm the cathedral building and, to a greater extent than the Project, it would block southerly views from the 11-story condominium building to the north and easterly views from the five-story, multi-family condominium to the west across Holt Avenue. The increased height of the church building and podium would in turn further impact the privacy of residents to the north of the Project Site. In addition, the significant diminishment in the integrity of feeling of the cathedral building, when combined with the previous diminishment in the integrity of design, workmanship and materials of the cathedral as a result of prior alterations, as well as the further diminishment in the integrity of design, workmanship and materials associated with the deconstruction, reassembly, rehabilitation and limited further alteration of the cathedral as part of Alternative 5 (the same as the Project) would materially impair the significance of the cathedral such that it would no longer be eligible for designation as a Los Angeles HCM:

5. Preserve and rehabilitate the historic cathedral building at its approximate current location in a manner that would not materially impair the historic

significance of the cathedral and would meet the current needs of Our Lady of Mt. Lebanon.

7. Include underground parking for Project uses to provide an appropriate visual separation and transition in massing between, and preserve the design integrity of the respective Project buildings.
8. Design the residential building to minimize, to the extent feasible, (a) the impact on views from the residential buildings to the north and west of the Project Site and (b) the privacy of project residents and residents to the north and west of the Project Site within their residential units.

In addition, Alternative 5 would not meet Objective 9 because a substantial portion of the parking would be located above-grade. It also would not meet Objective 10 because the multi-purpose room would be substantially reduced in size and located on the 7th level of the podium, resulting in a loss of direct proximity to the cathedral building:

9. Include underground parking for Project uses to provide an appropriate visual separation and transition in massing between, and preserve the design integrity of the respective Project buildings.
10. Locate the multi-purpose room on the same level as, and the other ancillary church space in close proximity to, the cathedral to allow the cohesive and efficient functioning of the church facilities.

Alternative 4 would meet Objective 6 to a lesser extent than the Project because the addition of the above-grade parking levels would require the multi-purpose room to be substantially reduced in size, so that Our Lady of Mt. Lebanon would not fully meet the growing needs of its parishioners and the Maronite community:

6. Replace the existing and outdated ancillary church space with modern and expanded ancillary church facilities to allow Our Lady of Mt. Lebanon to meet the growing needs of its parishioners and the Maronite community.

Alternative 5 would meet Objectives 1, 2, 3, and 4 to the same extent as the Project because it would include the same residential components and preserve the cathedral in the same manner as the Project:

1. Consistent with Mayor Eric Garcetti's goal in Executive Directive 13 of providing 100,000 affordable housing units by 2021, the Density Bonus Ordinance, the Housing Element of the City's General Plan, and the Wilshire Community Plan, provide a substantial number of new housing units to help meet the significant,

unmet demand for market-rate and affordable housing in the Project vicinity and the City.

2. Develop a residential building that will generate sufficient revenue for Our Lady of Mt. Lebanon to ensure its long-term survival.
3. Provide housing near transit stations, transit corridors, and substantial retail/commercial areas and medical facilities, to allow a range of transit options for residents and reduce vehicle miles traveled (VMT) by residents, which results in associated reductions in air pollutants and greenhouse gas emissions.
4. Maintain and enhance the religious presence and operation of the church on the site that has been the home of Our Lady of Mt. Lebanon for more than 50 years, including the retention and expansion of its faith-based programs and charitable ministry.

V. Alternatives

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 V-1 beginning on page V-8 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 2—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.