

# Executive Summary

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the 656 South San Vicente Medical Office Project (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a general description of the Project and proposed entitlements, a description of the organization of this Draft EIR, an overview of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, and a summary of the alternatives to the Project evaluated in this Draft EIR including identification of the Environmentally Superior Alternative.

## 1. Purpose of this Draft EIR

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

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

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

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

Planning and Research, regional and local agencies, interested organizations, and members of the public for a 30-day review period, commencing January 14, 2020, and ending February 13, 2020. The Initial Study, NOP, and NOP comment letters are included in Appendix A, of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts in the following environmental issue areas:

- Air Quality
- Cultural Resources (including historical resources and archaeological resources)
- Energy
- Geology and Soils (including liquefaction, unstable geologic units, expansive soils, and paleontological resources)
- Greenhouse Gas Emissions
- Land Use and Planning (including conflicting with adopted land use plans, policies or regulations)
- Noise
- Public Services (including fire protection and police protection)
- Transportation (including conflicting with a program, plan, ordinance, or policy, and vehicle miles traveled (VMT))
- Tribal Cultural Resources

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to aesthetics, agriculture and forestry resources, air quality (as it relates to objectionable odors), biological resources, cultural resources (as it relates to human remains), geology and soils (as it relates to fault rupture, strong seismic ground shaking, landslides, soil erosion, and the ability of soils to support the use of septic tanks), hazards and hazardous materials, hydrology and water quality, land use and planning (as it relates to physical division of an established community), mineral resources, noise (as it relates to airport or airstrip-related noise), population and housing, public services (as it relates to school, parks, and other public facilities), recreation, transportation (as it relates to increased hazards and emergency access), and utilities and service systems.

### 3. Draft EIR Organization

The Draft EIR is comprised of the following chapters:

**ES. Executive Summary.** This chapter of the Draft EIR provides an overview of the entire document in a concise, summarized format. It briefly describes the Project (location and key Project features), the CEQA review process and

focus, identifies effects found to be significant and unavoidable, identifies areas of controversy, provides a summary of the Project alternatives (descriptions and conclusions regarding comparative impacts), and provides a summary of Project impacts, project design features and mitigation measures, and the level of impact significance following implementation of mitigation measures.

- I. **Introduction.** This chapter describes the purpose of the EIR, including CEQA compliance requirements, the steps undertaken to date regarding implementation of the CEQA process, and summarizes the Draft EIR's organization.
- II. **Project Description.** This chapter describes the location, objectives, and physical and operational characteristics of the Project.
- III. **Environmental Setting.** This chapter presents an overview of the Project's environmental setting, including on-site and surrounding land uses. This chapter also provides a list and the mapped locations of past, present, and probable future projects (i.e., related projects) considered in the analysis of potential Project contributions to cumulative impacts.
- IV. **Environmental Impact Analysis.** This chapter contains the environmental setting, regulatory framework, methodology, thresholds of significance, Project characteristics and/or project design features, Project-specific and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: (A) Air Quality; (B) Cultural Resources; (C) Energy; (D) Geology and Soils; (E) Greenhouse Gas (GHG) Emissions; (F) Land Use and Planning; (G) Noise; (H.1) Fire Protection; (H.2) Police Protection; (I) Transportation; and (J) Tribal Cultural Resources.
- V. **Alternatives.** This chapter describes a reasonable range of alternatives to the Project, including the No Project/No Build Alternative, Development under Existing Zoning Alternative, Reduced Square Footage Alternative, and Residential Mixed-Use Alternative. This chapter also evaluates the environmental effects of the alternatives for each issue area analyzed in the Draft EIR.
- VI. **Other CEQA Considerations.** This chapter includes a discussion of issues required by CEQA that are not covered in other chapters. This includes significant unavoidable impacts, reasons why the Project is being proposed, notwithstanding significant unavoidable impacts, significant irreversible environmental changes, growth-inducing impacts, potential secondary effects caused by the implementation of the mitigation measures for the Project, and effects found not to be significant.

**VII. References.** This chapter lists the references and sources used in the preparation of this Draft EIR.

**VIII. List of EIR Preparers and Organizations and Persons Contacted.** This chapter lists the persons, public agencies, and organizations that were consulted or who contributed to the preparation of this Draft EIR.

**IX. Acronyms and Abbreviations.** This chapter defines acronyms used in the Draft EIR.

The environmental analyses in this Draft EIR are supported by the following appendices:

- Appendix A – Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP and Scoping Meeting Comments
  - A-1 NOP
  - A-2 Initial Study and Appendices
  - A-3 Scoping Meeting Materials
  - A-4 NOP and Scoping Meeting Comments
- Appendix B – Air Quality and Greenhouse Gas Technical Appendix
- Appendix C – Historic Resources Assessment
- Appendix D – Cultural Resources Assessment
- Appendix E – Energy Calculations
- Appendix F – Geotechnical Investigation
- Appendix G – Land Use Plans and Policies: Project Consistency Tables
- Appendix H – Noise Analysis
- Appendix I – Public Service Letters
  - I-1 Los Angeles Fire Department Correspondence
  - I-2 Los Angeles Police Department Correspondence
- Appendix J – Transportation Analysis
  - J-1 Traffic Assessment
  - J-2 LADOT Correspondence Approving the Transportation Assessment
- Appendix K – Tribal Cultural Resources Correspondence
  - K-1 AB 52 Notification Letters
  - K-2 AB 52 Response Letters and Evidence

## 4. Existing Project Site Conditions and Project Location

The Project Site is an approximately 0.76-acre (33,060 gross square feet, 32,290 net square feet) property located in the Wilshire Community Plan area of the City of Los Angeles (City). The Project Site is located at 650-676 South San Vicente Boulevard, on the northeast corner of Wilshire Boulevard and South San Vicente Boulevard, in an urbanized area adjacent to existing commercial, office, residential, and medical related uses. The Project Site is presently developed with a 5,738-square-foot vacant educational building<sup>1</sup> and an 8,225-square-foot Big 5 Sporting Goods store on seven contiguous parcels. Surface parking associated with these uses is located on the southeastern portion of the Project Site, abutting the frontage road of South San Vicente Boulevard, South Sweetzer Avenue, and the alley to the northeast. Additional surface parking is in the middle of the Project Site between the two buildings, and to the rear of the Big 5 Sporting Goods store.

## 5. Description of the Proposed Project

The Project would demolish the existing 5,738-square-foot vacant educational building, 8,225-square-foot Big 5 Sporting Goods store, and associated surface parking to develop a 145,305 square-foot medical office and retail-commercial development. The proposed building would include 12 stories and would measure approximately 218 feet in height (230 feet to the top of the mechanical penthouse). The Project would include seven floors of medical office uses over four floors of above-grade parking, and a ground floor containing a lobby for the medical office and commercial uses. Small terraced landscaped areas overlooking South San Vicente Boulevard would be provided in the upper floors for the proposed building. The Project would provide full-valet services for 418 parking spaces, including 393 vehicle parking spaces for medical office uses and 25 vehicle parking spaces for retail-commercial uses. The Project would also provide full-valet service for bicycle parking and would include 716 bicycle parking spaces for short- and long-term use.

CEQA Guidelines Section 15124(b) states that a project description shall contain “a statement of the objectives sought by the proposed project.” In addition, CEQA Guidelines Section 15124(b) further states that “the statement of objectives should include the underlying purpose of the project.”

The underlying purpose of the Project is to redevelop the Project Site, which contains low-rise commercial buildings, with a mixed-use development that

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<sup>1</sup> The 5,738-square-foot vacant building previously housed the Montessori Children’s World School. As the building was vacated October 2018, credit for this use was included as part of the baseline under CEQA as this reflects the amount of floor area that was in active use during the past two years.

provides medical office and retail-commercial uses. As set forth in the CEQA Guidelines, the Project's specific objectives are as follows:

1. Encourage economic growth in the community through the creation of construction jobs and full-time, on-site jobs.
2. Redevelop the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities to serve the local community and regional area near a key regional medical center.
3. Incorporate sustainable and green building design and construction that exceed building code and Title 24 requirements in areas related to landscape design (green roofs/balconies) to incorporate ecofriendly building materials, systems and features, solar efficiency (solar ready roofs), efficient and low flow water management non-VOC paints and adhesives, high performance building envelope and energy efficient building systems.
4. Develop the site with a well-designed commercial and medical office project within a transit priority area which would maximize the benefit of nearby Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, an Antelope Valley Transit Authority (AVTA) bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station (expected to open in 2023) and, thus, would support smart growth with the intent of reducing air quality emissions and VMT generation.
5. Construct a medical office building at an intensity consistent with the zoning for commercial buildings on Wilshire Boulevard which include similar mid-rise office buildings in proximity of transit and along corridors.
6. Enhance the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area.

## **6. Areas of Controversy/Issues to Be Resolved**

The following summarizes the environmental concerns raised in response to the NOP, including comments received at the public scoping meeting held during the NOP circulation period. Public comments are included in Appendix A and include the following general topics:

- Blocked views, glare, and shading on nearby residential uses due to scale and massing of the Project;
- Worsened air quality, greenhouse gas emissions, noise, and traffic resulting from Project construction;
- Increased traffic and worsened street parking conditions in the surrounding area due to the Project;

- Cumulative growth in the San Vicente area leading to increased housing density;
- Increased stress on existing public services availability and aging infrastructure (e.g., wastewater, police, fire);
- Potential for site to be used for other uses, specifically community services; and
- Potential for on-site liquefaction due to soil conditions.

## 7. Public Review Process

As further described in **Chapter I, *Introduction***, of this Draft EIR, the City circulated a Notice of Preparation (NOP) to the State Clearinghouse, Office of Planning and Research, regional and local agencies, interested organizations, and members of the public for a 30-day review period, commencing January 14, 2020, and ending February 13, 2020. The purpose of the NOP was to formally convey that the City was preparing a Draft EIR for the Project and to solicit input regarding the scope and content of the Draft EIR. The NOP, Initial Study, and NOP Comment Letters are included in Appendix A of this Draft EIR. In addition, a public scoping meeting was held on January 28, 2020.

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

## 8. Summary of Environmental Impacts

This section provides a summary of impacts, project design features, mitigation measures, and level of significance after implementation of mitigation measures associated with Project. The summary is provided by environmental issue area below in **Table ES-1, *Summary of Project Impacts, Project Design Features, and Mitigation Measures***.

Based on the analysis contained in **Chapter IV, *Environmental Impact Analysis***, and as shown in Table ES-1, the Project would result in significant and unavoidable impacts with regard to noise as it relates to Project-level and cumulative on-site and cumulative off-site construction noise impacts to noise sensitive receptors and Project-level on-site construction vibration impacts for human annoyance to adjacent sensitive receptors.

The Project would not result in any significant and unavoidable operational impacts. Detailed analysis is provided in **Chapter IV, *Environmental Impact Analysis***, of this Draft EIR.

**TABLE ES-1**  
**SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
<b>DRAFT EIR</b>			
<b>IV.B Air Quality</b>			
<b>Threshold (a):</b> Would the Project conflict with or obstruct implementation of the applicable air quality plan?	None	No mitigation measures are required.	Less than Significant
<b>Threshold (b):</b> Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	None	No mitigation measures are required.	Less than Significant
<b>Threshold (c):</b> Would the Project expose sensitive receptors to substantial pollutant concentrations?	None	<p><b>AIR-MM-1:</b> The Applicant will implement the following construction equipment features for equipment operating at the Project Site. These features will be included in applicable bid documents, and successful contractor(s) must demonstrate the ability to supply such equipment. Construction features will include the following:</p> <ul style="list-style-type: none"> <li>• For off-road diesel-powered construction equipment rated greater than 50 horse power: the equipment shall meet or exceed the CARB and USEPA Tier 4 off-road emissions standards or greater during Project construction or shall be fitted with an emissions control device that achieves diesel emissions reductions that are no less than what</li> </ul>	<p>Less than Significant for:</p> <ul style="list-style-type: none"> <li>• Localized Operational Emissions</li> <li>• Carbon Monoxide Hotspots</li> <li>• Toxic Air Contaminant Emissions during Operation</li> </ul> <p>Less than Significant with Mitigation for:</p> <ul style="list-style-type: none"> <li>• Localized Construction Emissions</li> <li>• Toxic Air Contaminant Emissions during Construction</li> </ul>

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		<p>could be achieved by an EPA Tier 4 Final engine.</p> <ul style="list-style-type: none"> <li>• The Project Applicant shall implement the use of alternatively fueled equipment to the extent feasible for equipment greater than 50 horsepower. Equipment less than 50 horsepower shall be electric plug-in, solar-powered, or alternative fueled (i.e., non-diesel). Pole power shall be made available for use of electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment.</li> <li>• Alternative-fueled generators will be used when commercial models that have the power supply requirements to meet the construction needs of the Project are commercially available from local suppliers/vendors, and on-site electrical power is not available. The determination of the commercial availability of such equipment will be made by the City prior to the issuance of grading or building permits based on Applicant-provided evidence of the availability or unavailability of alternative-fueled generators and/or evidence obtained by the City from expert sources such as construction contractors in the region.</li> <li>• A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit</li> </ul>	

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		(if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with California Air Resources Board's Rule 2449.	
<b>IV.B Cultural Resources</b>			
<b>Threshold (a):</b> Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	None	No mitigation measures are required.	Less than Significant
<b>Threshold (b):</b> Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	None	<b>CUL-MM-1:</b> Prior to the issuance of a demolition permit, the Applicant shall retain a qualified archaeologist who meets the Secretary of the Interior's Professional Qualifications Standards to oversee an archaeological monitor who shall be present during construction excavations such as demolition, clearing/grubbing, grading, trenching, or any other construction excavation activity associated with the Project. The frequency of monitoring shall be based on the rate of excavation and grading activities, the materials being excavated (younger sediments vs. older	Less than Significant with Mitigation

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		<p>sediments), the depth of excavation, and, if found, the abundance and type of archaeological resources encountered. Monitoring may be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified Archaeologist. At a minimum, the need for monitoring will be reassessed at depths of excavation greater than five feet below surface. Prior to commencement of excavation activities, an Archaeological Sensitivity Training shall be given for construction personnel. The training session, to be carried out by the qualified Archaeologist, will focus on how to identify archaeological resources that may be encountered during earthmoving activities, and the procedures to be followed if such resources are encountered.</p> <p><b>CUL-MM-2:</b> In the event that historic (e.g., bottles, foundations, refuse dumps/prives, railroads, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed, ground-disturbing activities shall be halted or diverted away from the vicinity of the find so that the find can be evaluated. An appropriate buffer area shall be established by the qualified Archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by Project construction activities shall be evaluated by the qualified</p>	

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		<p>Archaeologist. If a resource is determined by the qualified Archaeologist to constitute a “historical resource” pursuant to CEQA Guidelines Section 15064.5(a) or a “unique archaeological resource” pursuant to PRC Section 21083.2(g), the qualified Archaeologist shall coordinate with the Applicant and the City to develop a formal treatment plan that would serve to reduce impacts to the resources. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment. If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society in the area for educational purposes.</p> <p><b>CUL-MM-3:</b> Prior to the release of the grading bond,<sup>2</sup> the qualified Archaeologist shall prepare a final report and appropriate</p>	

<sup>2</sup> A grading bond ensures the permit applicant is in compliance with the LAMC’s rules and regulations.

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		California Department of Parks and Recreation Site Forms for each resource at the conclusion of archaeological monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources and CEQA. The report and the Site Forms shall be submitted by the Applicant to the City of Los Angeles, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.	
<b>IV.C Energy</b>			
<b>Threshold (a):</b> Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	None	No mitigation measures are required.	Less than Significant
<b>Threshold (b):</b> Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	None	No mitigation measures are required.	Less than Significant

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<b>IV.D Geology and Soils</b>			
<b>Threshold (a)iii:</b> Would the Project directly or indirectly cause potential substantial adverse effects, including the risk or loss, injury, or death, involving: Seismically-related ground failure, including liquefaction?	None	No mitigation measures are required.	Less than Significant
<b>Threshold (c):</b> Would the Project be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	None	No mitigation measures are required.	Less than Significant
<b>Threshold (d):</b> Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risk to life or property?	None	No mitigation measures are required.	Less than Significant

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<p><b>Threshold (f):</b> Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p>None</p>	<p><b>GEO-MM-1:</b> A Qualified Paleontologist meeting the Society for Vertebrate Paleontology (SVP) Standards (Qualified Paleontologist) shall be retained prior to the approval of demolition or grading permits. The Qualified Paleontologist shall provide technical and compliance oversight of all work as it relates to paleontological resources, shall attend the Project kick-off meeting and Project progress meetings on a regular basis, and shall report to the Project Site in the event potential paleontological resources are encountered.</p> <p><b>GEO-MM-2:</b> The Qualified Paleontologist shall conduct construction worker paleontological resources sensitivity training at the Project kick-off meeting prior to the start of ground disturbing activities (including vegetation removal, pavement removal, etc.). In the event construction crews are phased, additional training shall be conducted for new construction personnel. The training session shall focus on the recognition of the types of paleontological resources that could be encountered within the Project Site and the procedures to be followed if they are found. Documentation shall be retained by the Qualified Paleontologist demonstrating that the appropriate construction personnel attended the training.</p> <p><b>GEO-MM-3:</b> Paleontological resources monitoring shall be performed by a qualified paleontological monitor (meeting the standards of the SVP, 2010) under the</p>	<p>Less than Significant with Mitigation for Construction</p> <p>No Impact for Operation</p>

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		<p>direction of the Qualified Paleontologist. Paleontological resources monitoring shall be conducted for all ground disturbing activities in previously undisturbed sediments which have high sensitivity for encountering paleontological resources. Depending on the conditions encountered, full-time monitoring can be reduced to part-time inspections or ceased entirely if determined adequate by the Qualified Paleontologist. The Qualified Paleontologist shall spot check the excavation on an intermittent basis and recommend whether the depth of required monitoring needs to be revised based on his/her observations. Monitors shall have the authority to temporarily halt or divert work away from exposed fossils or potential fossils. Monitors shall prepare daily logs detailing the types of activities and soils observed and any discoveries.</p> <p>If construction or other Project personnel discover any potential fossils during construction, regardless of the depth of work or location, work at the discovery location shall cease in a 50-foot radius of the discovery until the Qualified Paleontologist has assessed the discovery, conferred with the City, and made recommendations as to the appropriate treatment. Any significant fossils collected during Project-related excavations shall be prepared to the point of identification and curated into an accredited repository with retrievable storage, such as the Natural History Museum of Los Angeles</p>	

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		County. The Qualified Paleontologist shall prepare a final monitoring and mitigation report for submittal to the City in order to document the results of the monitoring effort and any discoveries. If there are significant discoveries, fossil locality information and final disposition shall be included with the final report, which shall be submitted to the appropriate repository and the City.	
<b>IV.E Greenhouse Gas Emissions</b>			
<b>Threshold (a):</b> Would the Project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?	<b>TRAF-PDF-1</b> (see below)	No mitigation measures are required.	Less than Significant
<b>Threshold (b):</b> Would the Project conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	<b>TRAF-PDF-1</b> (see below)	No mitigation measures are required.	Less than Significant
<b>IV.F Land Use and Planning</b>			
<b>Threshold (b):</b> Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<b>POL-PDF-2</b> (see below) <b>TRAF-PDF-1 and TRAF-PDF-2</b> (see below)	No mitigation measures are required.	Less than Significant

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<b>IV.G Noise</b>			
<p><b>Threshold (a):</b> Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</p>	None	<p><b>NOI-MM-1:</b> The Project shall provide temporary ground-level construction noise barriers, with a minimum height of eight feet and up to a height of 15 feet along the alleyway along the northeast property line, equipped with noise blankets or equivalent noise reduction materials rated to achieve sound level reductions of at least 10 dBA between the Project Site and ground-level sensitive receptor locations. These temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptor(s) during the duration of construction activities. Prior to obtaining any permits, documentation prepared by a noise consultant verifying compliance with this measure shall be submitted to the Department of City Planning.</p> <p><b>NOI-MM-2:</b> Noise- and vibration-generating construction equipment whose specific location on the Project Site may be flexible (e.g., compressors and generators) shall be located away from the nearest off-site sensitive land uses (at least 100 feet away), or natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such equipment towards these land uses.</p> <p><b>NOI-MM-3:</b> The Project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices. Flexible sound control curtains shall be</p>	<p>Less than Significant for:</p> <ul style="list-style-type: none"> <li>• Off-Site Construction Noise</li> <li>• On-Site Operational Noise</li> <li>• Off-Site Traffic Noise</li> </ul> <p>Significant and Unavoidable for:</p> <ul style="list-style-type: none"> <li>• On-Site Construction Noise</li> </ul>

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
		<p>placed around all drilling apparatuses, drill rigs, and jackhammers when in use that shall achieve a sound level reduction of at least 10 dBA between the Project Site and ground-level sensitive receptor locations.</p> <p><b>NOI-MM-4:</b> A construction liaison shall be provided to inform the nearby receptors when peak noise and vibration activities are scheduled to occur. Two weeks prior to the commencement of construction at the Project Site, notification shall be provided to properties identified as sensitive receptors that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.</p>	
<p><b>Threshold (b):</b> Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?</p>	<p><b>NOI-PDF-1: Impact Pile Driving and Blasting Prohibitions.</b> The Project will not use or allow impact pile drivers and will not require or allow blasting during construction activities. Augured or drilled piles are allowed.</p>	<p>No mitigation measures are required or feasible for on-site vibration impacts during construction for human annoyance.</p>	<p>Less than Significant for:</p> <ul style="list-style-type: none"> <li>• On-Site Construction Vibration for Structural Damage</li> <li>• Off-Site Construction Vibration for Structural Damage</li> <li>• Off-Site Construction Vibration for Human Annoyance</li> <li>• Vibration during Operation</li> </ul>

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Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
			Significant and Unavoidable for: <ul style="list-style-type: none"> <li>• On-Site Construction Vibration for Human Annoyance</li> </ul>
<b>IV.H.1 Public Services – Fire Protection</b>			
<b>Threshold (a):</b> Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection services?	<b>TRAF-PDF-2</b> (see below) <b>TRAF-PDF-3</b> (see below)	No mitigation measures are required.	Less than Significant
<b>IV.H.2 Public Services – Police Protection</b>			
<b>Threshold (a):</b> Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant	<b>TRAF-PDF-2</b> (see below) <b>TRAF-PDF-3</b> (see below) <b>POL-PDF-1: Security Features During Construction.</b> During construction, the Project Site shall be fenced and gated with surveillance cameras to monitor the site during off hours. Security lighting shall also be provided in and around the construction site.	No mitigation measures are required.	Less than Significant

**TABLE ES-1**  
**SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?	<b>POL-PDF-2: Security Features During Operation.</b> During operation of the Project, access to the parking structure shall be controlled through gated entries, and the entry areas shall be well illuminated. Project Site security shall include controlled keycard access to medical office spaces, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV).		
<b>IV.I Transportation</b>			
<b>Threshold (a):</b> Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<b>TRAF-PDF-1: Transportation Demand Management (TDM) Program.</b> The Applicant will implement a TDM Program aimed at discouraging single-occupancy vehicle trips and encouraging alternative modes of transportation, such as carpooling, taking transit, walking, and biking. The TDM Program will be subject to review and approval by the Los Angeles Department of City Planning and LADOT. The exact measures to be implemented will be determined when the Program is prepared, prior to issuance of a final certificate of occupancy for the Project. The strategies will include, at a minimum, the following: <ul style="list-style-type: none"> <li>• Bicycle facilities including short-term and long-term parking, and onsite lockers and showers in accordance with Planning Code requirements;<sup>3</sup> and</li> </ul>	No mitigation measures are required.	Less than Significant

<sup>3</sup> Ordinance No. 185,480 amends Sections 12.03, 12.21 and 12.26 of the Los Angeles Municipal Code to update the bicycle parking regulations.

**TABLE ES-1**  
**SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	<ul style="list-style-type: none"> <li>• Marketing and promotions, including a transportation information center, kiosks and/or other on-site measures, such as providing a Tenant Welcome Package (i.e., all new commercial tenants receive information on available alternative modes and ways to access destinations).</li> </ul> <p><b>TRAF-PDF-2: Construction Traffic Management Plan.</b> Prior to the issuance of a building permit for the Project, a detailed Construction Management Plan (CMP), including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval. The CMP will formalize how construction will be carried out and identify specific actions that will be required to reduce effects on the surrounding community. The CMP will be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site. Construction management meetings with City staff and other surrounding construction-related project representatives (i.e., construction contractors), whose projects will potentially be under construction at around the same time as the Project, will be conducted bimonthly, or as otherwise determined appropriate by City staff. This coordination will ensure construction activities of the concurrent related</p>		

**TABLE ES-1**  
**SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	<p>projects and associated hauling activities are managed in collaboration with one another and the Project. The CMP will include, but not be limited to, the following elements as appropriate:</p> <ul style="list-style-type: none"> <li>• Advance notification of adjacent property owners and occupants, as well as nearby schools, of upcoming construction activities, including durations and daily hours of construction.</li> <li>• As parking lane and/or travel lane closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.</li> <li>• Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers, as appropriate.</li> <li>• Scheduling deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.</li> <li>• Provide off-site truck staging in a legal area furnished by the construction truck contractor. Anticipated truck access to the</li> </ul>		

**TABLE ES-1**  
**SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	<p>Project Site will be off of the South San Vicente Boulevard frontage road.</p> <ul style="list-style-type: none"> <li>• Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.</li> <li>• Advanced notification of temporary on-street parking removals and duration of removals along the South San Vicente Boulevard frontage road and Orange Street.</li> <li>• Coordinate with the City and emergency service providers to ensure adequate access, including emergency access, is maintained to the Project Site and neighboring businesses and residences. Emergency access points will be marked accordingly in consultation with the Los Angeles Fire Department (LAFD), as necessary.</li> </ul> <p><b>TRAF-PDF-3: Construction Worker Parking Plan.</b> The Applicant will prepare a Construction Worker Parking Plan prior to commencement of construction to identify and enforce parking location requirements for construction workers. The Construction Worker Parking Plan will include, but not be limited to, the following elements as appropriate:</p> <ul style="list-style-type: none"> <li>• During construction activities when construction worker parking cannot be accommodated on the Project Site, the plan will identify alternate parking location(s) for construction</li> </ul>		

**TABLE ES-1**  
**SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
	<p>workers and the method of transportation to and from the Project Site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.</p> <ul style="list-style-type: none"> <li>• Construction workers will not be permitted to park on street.</li> <li>• All construction contractors will be provided with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations.</li> </ul>		
<p><b>Threshold (b):</b> Would the Project conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?</p>	<p><b>TRAF-PDF-1</b> (see above)  <b>TRAF-PDF-2</b> (see above)  <b>TRAF-PDF-3</b> (see above)</p>	<p>No mitigation measures are required.</p>	<p>Less than Significant</p>
<b>IV.J Tribal Cultural Resources</b>			
<p><b>Threshold (a):</b> Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to</p>	<p>None</p>	<p>No mitigation measures are required.</p>	<p>Less than Significant</p>

**TABLE ES-1  
SUMMARY OF PROJECT IMPACTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES**

Environmental Impacts	Project Design Features (PDF)	Mitigation Measures (MM)	Level of Significance
<p>a California Native American tribe, and that is:</p> <ul style="list-style-type: none"> <li>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?</li> <li>ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?</li> </ul>			

SOURCE: ESA, 2021.

## 9. Summary of Alternatives

This Draft EIR examined four alternatives to the Project in detail, which include the No Project/No Build Alternative, the Development Under Existing Zoning Alternative, the Reduced Square-Footage Alternative, and the Residential Mixed-Use Alternative. A general description of these alternatives is provided below. Refer to **Chapter V, Alternatives**, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

### a) Alternative 1: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative (Alternative 1) for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states that, “in certain instances, the No Project/No Build Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, the No Project/No Build Alternative assumes that no new development would occur within the Project Site. The vacant educational building on the Project Site is assumed to continue to be vacant under this scenario and the Big 5 Sporting Goods store located on the Project Site would continue to operate as under existing conditions.

### b) Alternative 2: Development under Existing Zoning Alternative

With Development under the Existing Zoning Alternative (Alternative 2), the Project Site would be developed in accordance with the existing C1-1VL-O (Limited Commercial, Height District 1VL, Oil Drilling District) zoning. The C1 Zone generally permits commercial and retail uses. The “1VL” indicates Height District 1VL, which is a Very Limited Height District. In conjunction with the C1 Zone, Height District 1VL allows for three stories and 45 feet in height, and a maximum FAR of 1.5:1. The “O” designation identifies the City’s Oil Drilling (O) district, which is designated for areas where drilling of oil wells or the production from the wells of oil, gasses or hydrocarbon substances is permitted. Similar to the Project, this alternative would include medical office uses and commercial uses.

Alternative 2 would develop a total of 48,435 square feet of floor area on the Project Site compared to the Project’s proposed 145,305 square feet, for a 67 percent reduction in floor area. Alternative 2’s floor area would be comprised of 46,768 square feet of medical office uses and 1,666 square feet of ground floor retail-commercial uses. Consistent with the 1VL Height District, the proposed building under Alternative 2 would be three stories (45 feet in height), a reduction from the 12 stories (218 feet in height) as proposed under the Project. Alternative

2 would include no open space, which would be less than the total open space provided by the Project.

Due to the 1VL Height District , which restricts the proposed building under Alternative 2 to three stories (45 feet in height), the vehicle parking spaces would be provided in two subterranean parking levels and one ground-level parking area with double stackers and full valet service. As an existing groundwater channel is located within 20 feet below ground surface of the Project Site, the subterranean parking would require relocation of this existing underground groundwater channel. Pursuant to LAMC Section 12.21 A.4(c), the combination of medical office and retail-restaurant uses would require a total of 249 vehicle parking spaces. However, similar to the Project, the vehicular parking does account for a permitted reduction pursuant to Los Angeles Municipal Code (LAMC) Section 12.21 A.4(c), and a total of 169 vehicle parking spaces would be provided under Alternative 2. This is a reduction from the 418 vehicle parking spaces provided under the Project. As it related to bicycle parking spaces, 300 short-term and long-term bicycle parking spaces would be provided on the ground level and roof under Alternative 2, a reduction from the 716 short-term and long-term bicycle parking spaces provided under the Project.

Unlike the Project, Alternative 2 would not provide a visitor drop-off and valet area. Rather, all ingress and egress for visitor and employee vehicles to access the subterranean and ground-level parking would be provided via a driveway along Orange Street. A loading dock serving the medical office and retail/commercial uses would be located and accessed from Orange Street. No vehicular access would be provided through the alley. Pedestrian access to the retail-commercial uses would continue to be provided from the South Sweetzer Avenue and the frontage road of South San Vicente Boulevard. Access to the medical office uses would continue to be provided from the ground level lobby for the office building along the frontage road of South San Vicente Boulevard and from the parking levels via internal stairs and elevators.

As with the Project, Alternative 2 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. With reduced density and square footage, the overall length and intensity of construction would be less than that of the Project. However, construction of Alternative 2 would require more excavation as subterranean parking would be required to accommodate a portion of the vehicle parking spaces provided under this alternative, and the existing subterranean groundwater channel must be relocated.

### **c) Alternative 3: Reduced Square Footage Alternative**

Under the Reduced Square Footage Alternative (Alternative 3), the Project would see a 25 percent reduction in density and square feet. With this reduction, Alternative 3 would include 105,229 square feet of medical office uses and 3,750 square feet of ground floor retail-commercial uses (750 square feet of retail and 3,000 square feet of restaurant uses), for a total of 108,979 square feet compared to the Project's proposed 145,305 square feet. This alternative would have a FAR of 3.4:1. The proposed building under Alternative 3 would be nine stories (180 feet in height), a reduction from the 12 stories (218 feet in height) as proposed under the Project. Alternative 3 would have no open space, which would be less than the total open space provided by the Project.

Under Alternative 3, 313 vehicle parking spaces would be provided in four above-ground parking levels (Floors 2 through 5), and 664 short-term and long-term bicycle parking spaces would be provided on the ground level and roof. Similar to the Project, the vehicular parking accounts for a permitted reduction pursuant to LAMC Section 12.21 A.4(c).

As with the Project, Alternative 3 would provide a visitor drop-off and valet area that would be accessible from the visitor entrance off the frontage road of South San Vicente Boulevard to accommodate a parking queue and ride-share drop off area. Vehicle access for employees to the parking levels (Floors 2 through 5) would be provided from Orange Street. A loading dock serving the medical office and retail-commercial uses would be located and accessed from Orange Street. No vehicular access would be provided through the alley. Pedestrian access to the retail-commercial uses would continue to be provided from the South Sweetzer Avenue and the frontage road of South San Vicente Boulevard. Access to the medical office uses would continue to be provided from the ground level lobby for the office building along the frontage road of South San Vicente Boulevard and from the parking levels.

As with the Project, Alternative 3 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. With reduced density and square footage, the overall length and intensity of construction would be less than that of the Project.

### **d) Alternative 4: Residential Mixed-Use Alternative**

The Residential Mixed-Use Alternative (Alternative 4) is an alternative use scheme that would include a building with a mix of commercial and residential uses. No medical office uses would be included under this alternative. Similar to the Project, Alternative 4 would include 5,000 square feet of ground-floor commercial retail and

restaurant uses (1,000 square feet of retail and 4,000 square feet of restaurant uses). In addition, up to 80 residential dwelling units, encompassing 140,305 square feet, would be developed. Similar to the Project, the proposed building under this alternative would total 145,305 square feet for a total FAR of 4.5:1. The proposed building under Alternative 4 would have a similar number of stories and slightly reduced height as proposed under the Project (i.e., 12 stories and 191 feet in height). Total open space provided by Alternative 4 would be 10,000 square feet, which is greater than the total open space provided by the Project due to the open space requirements for residential uses.

Under Alternative 4, 164 commercial vehicle parking spaces and 121 residential vehicle parking spaces, for a total of 285 vehicle parking spaces, would be provided in a ground-floor parking area and in four above ground-parking levels (Floors 2 through 5), and 120 short-term and long-term bicycle parking spaces would be provided on the ground level and roof. Unlike the Project, the vehicular parking does not account for a permitted reduction pursuant to LAMC Section 12.21 A.4(c).

With regard to access and circulation, Alternative 4 would not include a visitor drop-off and valet area. Rather, one driveway from Orange Street would provide access to the ground-floor parking area and above-ground parking levels (Floors 2 through 5) for the commercial and residential vehicle parking spaces. The driveway off Orange Street would be located in a similar area as under the Project. No vehicular access would be provided through the alley. Pedestrian access to the retail-commercial uses would continue to be provided from the South Sweetzer Avenue and the frontage road of South San Vicente Boulevard. Access to the residential uses would be provided from a ground level lobby that would be provided along the frontage road of South San Vicente Boulevard and from the parking levels via internal stairs and elevators.

As with the Project, Alternative 4 would require the demolition of the existing vacant educational building, the Big 5 Sporting Goods store, and associated paved surface parking areas. However, as the density and square footage proposed under this alternative would be similar to that of the Project, the overall length and intensity of construction would be similar to the Project.

### **e) Environmentally Superior Alternative**

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR and that if the “no project” alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives.

Selection of an environmentally superior alternative is based on comparison of the four alternatives that would reduce or eliminate the significant impacts associated

with the Project, and on a comparison of the remaining environmental impacts of each alternative to the Project.

Of the alternatives analyzed in this Draft EIR, the No Project/No Build Alternative would be considered the environmentally superior because it would avoid the Project's significant and unavoidable impacts from construction noise and vibration. However, because no new development would occur and because the No Project/No Build Alternative would not meet any of the Project Objectives, the identification of another environmentally superior alternative is required.

Alternative 2, the Development under Existing Zoning Alternative, would have similar impacts as the Project or reduce most of the Project's less-than-significant impacts. However, Alternative 2 would require more excavation as subterranean parking would be required to accommodate a portion of the vehicle parking spaces provided under this alternative given the 1VL Height District, which restricts the proposed building under Alternative 2 to three stories (45 feet in height). As such, impacts directly related to ground disturbance, including archaeological, paleontological, and tribal cultural resources, would be greater under this alternative. In addition, Alternative 2 would not reduce the Project's significant and unavoidable impacts related to construction noise and vibration. However, this alternative would reduce the duration of construction activity in which the significant and unavoidable impacts would occur. Alternative 2 would fully be consistent with three of the Project's objectives, including 1) Encourage economic growth in the community through the creation of construction jobs and full-time, on-site jobs; 3) Incorporate sustainable and green building design and construction that exceed building code and Title 24 requirements in areas related to landscape design (green roofs/balconies) to incorporate ecofriendly building materials, systems and features, solar efficiency (solar ready roofs), efficient and low flow water management non-VOC paints and adhesives, high performance building envelope and energy efficient building systems; and 6) Enhance the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area. However, Alternative 2 would only partially be consistent with the remaining three objectives, including 2) Redevelop the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities to serve the local community and regional area near a key regional medical center; 4) Develop the site with a well-designed commercial and medical office project within a transit priority area which would maximize the benefit of nearby Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, an Antelope Valley Transit Authority (AVTA) bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station (expected to open in 2023) and, thus, would support smart growth with the intent of reducing air quality emissions and VMT generation; and 5) Construct a medical office building at an intensity consistent with the zoning for

commercial buildings on Wilshire Boulevard which include similar mid-rise office buildings in proximity of transit and along corridors.

Alternative 3, the Reduced Square Footage Alternative, as a reduced-scale development having an FAR of 3.4:1 compared to the Project's FAR of 4.5:1, would also have similar impacts as the Project or reduce many of the Project's less-than-significant impacts. No impacts under this alternative would be greater than the Project. As with Alternative 2, significant and unavoidable noise and vibration impacts under Alternative 3 would not be reduced to less-than-significant levels. Although Alternative 3, would not reduce environmental impacts to the same extent as under Alternative 2, it would reduce the overall scale of development and the range of impacts associated with construction duration compared to the Project. Similar to Alternative 2, Alternative 3 would fully be consistent with three of the Project's objectives, including 1) Encourage economic growth in the community through the creation of construction jobs and full-time, on-site jobs; 3) Incorporate sustainable and green building design and construction that exceed building code and Title 24 requirements in areas related to landscape design (green roofs/balconies) to incorporate ecofriendly building materials, systems and features, solar efficiency (solar ready roofs), efficient and low flow water management non-VOC paints and adhesives, high performance building envelope and energy efficient building systems; and 6) Enhance the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area. However, Alternative 3 would only partially be consistent with the remaining three objectives, including 2) Redevelop the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities to serve the local community and regional area near a key regional medical center; 4) Develop the site with a well-designed commercial and medical office project within a transit priority area which would maximize the benefit of nearby Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, an Antelope Valley Transit Authority (AVTA) bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station (expected to open in 2023) and, thus, would support smart growth with the intent of reducing air quality emissions and VMT generation; and 5) Construct a medical office building at an intensity consistent with the zoning for commercial buildings on Wilshire Boulevard which include similar mid-rise office buildings in proximity of transit and along corridors.

Alternative 4, the Residential Mixed-Use Alternative, would include the development of 140,305 square feet of residential rather than medical office uses. The retail/restaurant uses and overall building square footage would be the same as compared to the Project (5,350 and 145,305 square feet, respectively) but the height of the building would be reduced from 230 feet to 191 feet, due to the reduced ceiling requirements for residential uses. Alternative 4 would have similar impacts as the Project or reduce many of the Project's less-than-significant

impacts as many of the impacts related to construction and ground disturbance would be similar to the Project. As such, the significant and unavoidable noise and vibration impacts under Alternative 4 would be similar to the Project and would not be reduced to less-than-significant levels. Alternative 4 would result in a reduced VMT rate as compared to the Project's VMT rate. However, the change in uses as proposed under this alternative would also result in greater police protection impacts. As Alternative 4 proposes the development of residential uses rather than medical office uses, most of the Project's objectives would not be met. Similar to Alternative 2 and Alternative 3, Alternative 4 would fully be consistent with three of the Project's objectives, including 1) Encourage economic growth in the community through the creation of construction jobs and full-time, on-site jobs; 3) Incorporate sustainable and green building design and construction that exceed building code and Title 24 requirements in areas related to landscape design (green roofs/balconies) to incorporate ecofriendly building materials, systems and features, solar efficiency (solar ready roofs), efficient and low flow water management non-VOC paints and adhesives, high performance building envelope and energy efficient building systems; and 6) Enhance the urban built environment by fostering pedestrian activity through ground level restaurant or retail uses, street trees and landscaping, and signage and lighting compatible with the surrounding area. However, Alternative 4 would only partially be consistent with one objective, 4) Develop the site with a well-designed commercial and medical office project within a transit priority area which would maximize the benefit of nearby Los Angeles County Metropolitan Transportation Authority (Metro) bus lines, an Antelope Valley Transit Authority (AVTA) bus route, and the future Wilshire Boulevard/La Cienega Boulevard Metro D (Purple) Line Station (expected to open in 2023) and, thus, would support smart growth with the intent of reducing air quality emissions and VMT generation. As Alternative 4 would not include medical office uses, and, as such, would not meet the following objectives: 2) Redevelop the Project Site with a mixed-use project that primarily provides a medical office facility that would be compatible with surrounding medical facilities to serve the local community and regional area near a key regional medical center; and 5) Construct a medical office building at an intensity consistent with the zoning for commercial buildings on Wilshire Boulevard which include similar mid-rise office buildings in proximity of transit and along corridors.

Because Alternative 3 would reduce many of the Project's less-than-significant impacts and would not have any impacts greater than the Project, which is not the case under Alternative 2 and Alternative 4, and would either fully or partially meet each of the Project's objectives, Alternative 3 is considered to be the Environmentally Superior Alternative.

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