

# V. ALTERNATIVES

---

## 1. Introduction

The purpose of this section is to assess a reasonable range of alternatives to the Project that would feasibly attain most of the basic Project objectives and avoid or substantially lessen any of the potential significant effects of the Project and to evaluate the comparative merits of the alternatives (CEQA Guidelines Section 15126.6). The CEQA Guidelines state that the selection of alternatives should be governed by a “rule of reason.” The CEQA Guidelines also state that, “[t]he EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” Generally, significant effects of an alternative shall be discussed, but in less detail than the project, and should provide decision-makers perspective as well as a reasoned choice.

## 2. Analysis Format

To develop Project alternatives, the Lead Agency considered the Project objectives and reviewed the significant impacts identified in Section IV of this EIR, considered whether those significant impacts could be substantially avoided or reduced through a range of reasonable Project alternatives, and evaluated the comparative merits of the alternatives. The potential environmental impacts associated with the selected Alternatives are described below and are compared to the environmental impacts associated with the Project (also refer to Table V-2 at the end of this section).

### (1) Project Objectives

The objectives of the Project are as follows:

- Promote smart growth by locating in-fill residential and community-serving commercial uses, near public transit lines (Metro Rail and Bus), and employment centers, thereby reducing vehicle miles traveled (VMT), pollutant emissions, and greenhouse gas emissions.
- Contribute housing toward the City’s Regional Housing Needs Assessment (RHNA) allocation.
- Provide a mix of residential units for varying income levels, including units reserved for Very Low Income households.
- Preserve and rehabilitate the east and south façades of the building at 5401 Wilshire Boulevard and incorporate them into a new building, with the extant character-defining features of the primary south and east façades preserved and restored.
- Provide residential units and ground floor commercial uses that generate local tax revenues.

- Create a pedestrian friendly environment and activate the ground floor street frontages by providing pedestrian amenities such as landscaped areas with benches and ground floor commercial uses.
- Develop an iconic, architecturally-compelling vertical neighborhood that adds visual distinction and a unique feature to the Miracle Mile.

## (2) Significant Project Impacts

The Project would result in the following significant and unavoidable impacts:

- Historical Resources (Project)
- Construction Vibration, On-Site and Off-Site Sources (Human Annoyance, Project and Cumulative)

## 3. Overview of Alternatives to the Project

The following alternatives to the Project have been selected for evaluation based on the significant environmental impacts of the Project, the objectives established for the Project, and the feasibility of the alternatives considered.

**Alternative 1:** No Project Alternative

**Alternative 2:** Preservation Alternative (Zoning Compliant Project and Reduced Project)

A comparison of the general land uses proposed as part of the Project and Alternative 2 is shown in Table V-1. A more detailed discussion of the alternatives and impacts that would occur under the alternatives is included below.

**Table V-1  
Comparison of Key Assumptions**

|                                  | Project    | Alternative 2 |
|----------------------------------|------------|---------------|
| <i>Proposed Uses</i>             |            |               |
| Floor Area (land uses)           | 476,777 sf | 303,971 sf    |
| Residences                       | 348 units  | 228 units     |
| Commercial Uses                  | 12,821 sf  | 12,821 sf     |
| Retail                           | 7,378 sf   | 11,821 sf     |
| Restaurant                       | 4,443 sf   | 0 sf          |
| Café                             | 1,000 sf   | 1,000 sf      |
| Floors above grade (residential) | 39 levels  | 27 levels     |
| Floors above grade (podium)      | 3 levels   | 3 levels      |
| Subterranean levels (garage)     | 3 levels   | 3 levels      |
| Parking spaces                   | 478 spaces | 405 spaces    |
| <i>Construction Assumptions</i>  |            |               |
| Demolition                       | -38,545 sf | -22,162 sf    |
| Excavation depth (feet)          | 63 feet    | 63 feet       |
| sf=square feet                   |            |               |

## 4. Alternatives Not Required to be Analyzed

As discussed in the Initial Study prepared for the Project (included in Appendix A-1 of this Draft EIR), and also in Section I, Executive Summary, the Project qualifies as a Transit Priority Project (TPP) and meets the criteria for certain CEQA streamlining benefits by way of preparing a Sustainable Communities EIR (SCEIR). Pursuant to Public Resources Code (PRC) Section 21155.2(c), a qualifying TPP is not required to analyze off-site alternatives to the TPP. In addition, pursuant to PRC Section 21159.28, the SCEIR is not required to analyze a reduced residential density alternative to address the effects of cars and light-duty truck trips generated by the Project.

## 5. Alternatives Considered and Rejected

As set forth in CEQA Guidelines Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected due to the infeasibility of the alternative and/or the inability of the alternative to meet most of the basic Project's objectives or substantially reduce or avoid the Project's significant impact after mitigation. An EIR should also briefly explain the reasons for their rejection. According to CEQA Guidelines Section 15126.6(c), among the factors that may be used to eliminate an alternative from detailed consideration is 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. In considering ways to substantially reduce or avoid the significant impacts identified for the Project (i.e., to historic resources and construction vibration) the following alternatives were considered but rejected for further review due to the infeasibility of these alternatives.

### Alternatives to Eliminate Significant Vibration Impacts During Construction

As discussed in Section IV.B, Noise, of this Draft EIR, the Project would result in short-term significant and unavoidable impacts with respect to on- and off-site construction vibration pursuant to the threshold for human annoyance (Project-level and cumulative). The following approaches were considered to substantially reduce or avoid these impacts:

- Approach (a): Above-Grade Parking. An approach where all parking is provided above rather than below grade was considered, thus avoiding much of the excavation and hauling activity required for the Project. However, this was rejected as infeasible for the following reasons:
  - Construction equipment utilized under this approach would be similar to the Project, and would therefore generate similar vibration levels. Therefore, on-site construction vibration impacts with respect to human annoyance would be significant and similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment (i.e., the amount of construction on any given day would be the same as the Project due to the use of similar equipment) as well as the proximity of the nearest sensitive receptors, which are approximately five feet north of the Project Site on Cochran

Avenue. In addition, off-site construction vibration impacts with respect to human annoyance would continue to be significant, as heavy duty trucks would still be traveling by sensitive receptors as a result of the need to haul the demolition debris from the Project Site.

- Approach (b): Extended Construction Duration. An approach that extends the construction period was also considered, thus reducing the daily construction activity. However, this approach was rejected for the following reasons:
  - The on-site construction vibration impacts with respect to human annoyance would still be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual pieces of construction equipment, and the extended duration of construction would still utilize similar construction equipment. Since similar equipment would be used, vibration levels would be similar to the Project. In addition, because the haul routes would be the same, off-site construction vibration impacts with respect to human annoyance would still be significant based on the need to haul demolition debris from the Project Site.
- Approach (c): Reduced Development. An approach that reduced the amount of development that would occur to the point that the significant construction vibration impacts would be avoided or substantially reduced was also considered, but ultimately rejected for the following reasons:
  - The on-site construction vibration impacts with respect to human annoyance would be significant and similar to the Project as the vibration impact analysis is based on the peak vibration level generated by individual pieces of construction equipment, as well as the proximity of the nearest sensitive receptors, which are approximately five feet north of the Project Site on Cochran Avenue. In addition, because the haul routes would be the same, off-site construction vibration impacts with respect to human annoyance would still be significant based on the need to haul demolition debris from the Project Site.

As indicated above, none of the above approaches would substantially avoid the Project's significant construction-related vibration impact with respect to human annoyance. In addition, approaches (a) through (c) would not achieve the Project objectives to the same extent as the Project. Approach (b) would extend the construction period, meaning impacts would affect sensitive receptors for a longer period of time, making this approach infeasible. Approaches (a) and (c) would provide less housing near transit, which would be inconsistent with City land use objectives and requirements for the Project Site. Therefore, an alternative that includes one or more of these approaches has been rejected from further consideration in this Draft EIR.

## 6. Analysis of Selected Alternatives

### a) Alternative 1: No Project Alternative

#### (1) Description of the Alternative

CEQA requires the alternatives analysis to include a “no project” alternative, which is the circumstance under which the Project does not proceed. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the project with the impacts of not approving the project (CEQA Guidelines Section 15126.6[e][1]). Pursuant to CEQA Guidelines Section 15126.6(e)(2), requirements of the analysis of the “no project” alternative are as follows:

*The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.*

At the time the Notice of Preparation (NOP) was published for the Project, there was no evidence that another development at the Project Site would be forthcoming in the event the Project is not approved. Thus, for purposes of this EIR, Alternative 1 assumes that the Project Site would remain in its current condition as described in Section III, Environmental Setting, as developed with approximately 38,545 square feet of commercial uses and associated surface parking. Although no new development would occur on the Project Site under Alternative 1, this alternative assumes the development of the related projects in the area of the Project Site. No discretionary actions would be required by local, state, or federal agencies for this alternative.

#### (2) Environmental Impacts

##### (a) *Cultural Resources*

As discussed in Section IV.A (Cultural Resources) of this Draft EIR, the existing building at 5401 Wilshire Boulevard (Sontag Drug Building) is considered a historical resource. While the Project proposes to preserve the primary south and east façades of this building and incorporate them into a new building, the Project would require the demolition of a substantial amount of original building fabric including the west wall, north wall, roof, and foundation. As Alternative 1 includes the retention of the existing building, it would result in no impact with respect to historical resources, which is less than the Project’s significant and unavoidable impact with respect to historical resources.

### (b) *Noise*

As discussed in Section IV.B (Noise) of this Draft EIR, there are no feasible mitigation measures that could reduce the temporary vibration human annoyance impacts from on- and off-site sources, and therefore, the Project's vibration impacts from on-site and off-site construction activities with respect to human annoyance would be significant and unavoidable. The analysis contained in Section IV.B determined that all other impacts with respect to noise and vibration would be less than significant. Alternative 1 includes the continuation of the existing conditions at the Project Site and no construction would occur. As such, Alternative 1 would result in no impact with respect to noise and vibration, which is less than the Project's significant and unavoidable impact with respect to construction vibration (human annoyance).

### (3) Summary of Impacts

As demonstrated above, Alternative 1 would result in no impact with respect to historical resources and construction vibration, while the Project would result in significant and unavoidable impacts with respect to these issues. Therefore, Alternative 1 would avoid the Project's significant and unavoidable impacts.

### (4) Relationship of Alternative 1 to the Project Objectives

Alternative 1 would not meet any of the Project objectives, as it would not contribute housing to the City's RHNA allocation or promote smart growth thereby reducing VMT. Specifically, Alternative 1 would not:

- Promote smart growth by locating in-fill residential and community-serving commercial uses, near public transit lines (Metro Rail and Bus), and employment centers, thereby reducing vehicle miles traveled (VMT), pollutant emissions, and greenhouse gas emissions.
- Contribute housing toward the City's Regional Housing Needs Assessment (RHNA) allocation.
- Provide a mix of residential units for varying income levels, including units reserved for Very Low Income households.
- Preserve and rehabilitate the east and south façades of the building at 5401 Wilshire Boulevard and incorporate them into a new building, with the extant character-defining features of the primary south and east façades preserved and restored.
- Provide residential units and ground floor commercial uses that generate local tax revenues.

- Create a pedestrian friendly environment and activate the ground floor street frontages by providing pedestrian amenities such as landscaped areas with benches and ground floor commercial uses.
- Develop an iconic, architecturally-compelling vertical neighborhood that adds visual distinction and a unique feature to the Miracle Mile.

## **b) Alternative 2: Preservation Alternative – Zoning Compliant Project and Reduced Project**

### **(1) Description of the Alternative**

As discussed in Section IV.A (Cultural Resources) of this Draft EIR, the existing building at 5401 Wilshire Boulevard (Sontag Drug Building) is considered a historical resource. Alternative 2 would preserve the existing building at 5401 Wilshire Boulevard (the remaining 22,162 square feet of existing development would be demolished) and a new tower would be developed on the remainder of the Project Site. Consistent with the existing zoning for the Project Site, the new tower under Alternative 2 would include 228 residential units and 12,821 square feet of ground floor commercial space. However, instead of the restaurant uses that would occupy the new building at 5401 Wilshire Boulevard as part of the Project, under Alternative 2, the building at 5401 Wilshire Boulevard would be occupied by retail uses. The new tower constructed as part of Alternative 2 would include 30 stories (27 stories over a three-level podium) with three levels of subterranean parking. However, while the Project would include subterranean parking across the entirety of the Project Site, Alternative 2 would not include subterranean parking under the building at 5401 Wilshire Boulevard. Alternative 2 would have a total floor area of approximately 303,971 square feet.

### **(2) Environmental Impacts**

#### **(a) *Cultural Resources***

As discussed in Section IV.A (Cultural Resources) of this Draft EIR, the existing building at 5401 Wilshire Boulevard (Sontag Drug Building) is considered a historical resource. While the Project proposes to preserve the primary south and east façades of this building and incorporate them into a new building, the Project would require the demolition of a substantial amount of original building fabric including the west wall, north wall, roof, and foundation. Alternative 2 includes the retention of the existing building at 5401 Wilshire Boulevard. As such, it would result in no impact with respect to historical resources, which is less than the Project's significant and unavoidable impact with respect to historical resources.

#### **(b) *Noise***

##### **(i) *Construction Noise***

Alternative 2's construction activities would generate noise at the Project Site between 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with LAMC Section 41.40(a). On Saturdays, construction would be permitted to occur between 8:00 A.M. and 6:00 P.M. No construction is permitted on Sundays. Because Alternative 2's construction activities would run for more than ten days in a three-month period, the applicable threshold of significance for noise impacts is a 5 dBA increase in noise levels.



Based on the smaller scale of development for Alternative 2 (retention of the existing building at 5401 Wilshire Boulevard and the construction of a smaller new building), Alternative 2 would reduce the duration of construction impacts when compared to the Project, based on a shorter construction period when compared to the Project. With regard to noise from excavation and grading, while Alternative 2 would not include subterranean parking under the building at 5401 Wilshire Boulevard, Alternative 2 would still require excavating 63 feet below grade, resulting in no change in maximum noise levels from on-site grading and excavation. As a result, impacts on all sensitive receptors would be similar to those of the Project, including the impacts at residences on Cochran Avenue, where construction noise impacts would not benefit from the retention of the 5401 Wilshire Boulevard building at the southeast corner of the Project Site and would still exceed the 5 dBA  $L_{eq}$  threshold of significance. Therefore, construction noise impacts from Alternative 2 would be similar to those of the Project and would still exceed the City's 5 dBA threshold. Like the Project, this impact would be less than significant with implementation of Mitigation Measure MM-NOI-1, as provided for the Project.

Because of the smaller scope of development, construction of Alternative 2 would require fewer vehicle and truck trips than the Project during construction. For example, less building material would be imported to the Project Site under Alternative 2, with potentially fewer vendor and worker trips as well. As the existing building at 5401 Wilshire Boulevard would not be demolished, haul truck trips relating to debris removal would be fewer for Alternative 2 than for the Project. Finally, Alternative 2 would require less soil export based on the reduction in subterranean parking, as subterranean parking would not be provided under the 5401 Wilshire Boulevard building. As off-site construction noise impacts from buildout of Alternative 2 would generally be lower than the Project, these off-site impacts would also not elevate traffic noise substantially and would not be considered significant, like the Project.

#### *(ii) Construction Vibration*

In order to construct improvements for Alternative 2, demolition of the existing commercial building at 5407 Wilshire Boulevard and the surface parking lot would be required, though the retention of the 5401 Wilshire Boulevard building would result in an incremental reduction in groundborne vibrating-activity. As a result, construction vibration impacts with respect to potential building damage would be similar for both the Project and Alternative 2, though impacts for Alternative 2 would be incrementally lower. As such, both the Project and Alternative 2's impacts with respect to building damage from construction vibration would be less than significant. In addition, as Alternative 2 includes the retention of the 5401 Wilshire Boulevard building, it would also require implementation of Mitigation Measure MM-NOI-2, as provided for the Project, to ensure that any damage to this building is avoided and if any damage were to occur, it would be repaired in accordance with the Secretary of the Interior Standards.

With regard to human annoyance vibration from on-site sources, Alternative 2 would have similar impacts on nearby sensitive receptors, as the construction of the new tower (while reduced in scale) would require activities that would impact the ground at the Project Site, particularly during the grading and excavation phase. The retention of the 5401 Wilshire Boulevard building at the

southeast corner of the Project Site would not reduce the exposure to residents at 664 Cochran Avenue to the west and 661 Cloverdale Avenue to the north. As a result, construction of Alternative 2 would still result in significant and unavoidable impacts at these two nearby sensitive receptors. Therefore, Alternative 2 would result in significant and unavoidable human annoyance vibration impacts, like the Project.

Off-site building damage vibration impacts from construction trucks on local roadways would be less than for the Project during the demolition, excavation, and building construction phases, as there would be fewer trucks associated with hauling of demolition debris (given the retention of the existing building at 5401 Wilshire Boulevard); hauling of soil export (given the reduced amount of excavation as there would be no subterranean parking under the 5401 Wilshire Boulevard building); and importing of construction material, workers, and vendors. As a result, like the Project, these off-site vibration impacts with respect to building damage would be less than significant, same as the Project.

With regard to human annoyance, heavy-duty truck activity could result in vibration levels along truck routes that exceed the thresholds of significance under FTA guidance. Like the Project, there are no feasible mitigation measures that could reduce off-site human annoyance impacts from haul trucks and this impact would be considered significant and unavoidable, the same as the Project.

### *(iii) Operational Noise*

The analysis contained in Section IV.B (Noise) determined that the Project would result in less than significant operational noise impacts for both on- and off-site uses. The types of on-site noise sources identified for the Project (mechanical equipment, outdoor spaces/human conversation, loading dock/trash collection, and parking facilities) would also exist at the Project Site under Alternative 2, as Alternative 2 would include the same uses as the Project (residential and retail/restaurant uses). However, noise from on-site sources under Alternative 2 would be reduced when compared to the Project based on the reduced size of the development. It is therefore assumed that Alternative 2 would generate fewer vehicle trips than the Project based on its reduced size, and would thereby generate less noise on local roadways. However, like the Project, this impact would be less than significant.

### *(iv) Operational Vibration*

Like the Project, Alternative 2 would develop residential, retail, and restaurant uses that are not expected to utilize heavy-duty mechanical equipment that would generate significant sources of vibration during operation. Related vehicle travel would not be considered a significant source of vibration because vehicle travel rarely generates perceptible groundborne vibrations. Therefore, Alternative 2's impacts with respect to operational vibration would be less than significant.

### (3) Summary of Impacts

As described previously, the Project would result in significant and unavoidable impacts with respect to historical resources and construction vibration (human annoyance). The retention of the existing building at 5401 Wilshire Boulevard as part of Alternative 2 would avoid the Project's significant and unavoidable impact with respect to historical resources. However, like the Project, Alternative 2 would still result in a significant and unavoidable human annoyance vibration impact during construction (from on- and off-site sources).

### (4) Relationship of Alternative 1 to the Project Objectives

Alternative 2 would meet the following Project objectives:

- Preserve and rehabilitate the east and south façades of the building at 5401 Wilshire Boulevard and incorporate them into a new building, with the extant character-defining features of the primary south and east façades preserved and restored.
- Develop an iconic, architecturally-compelling vertical neighborhood that adds visual distinction and a unique feature to the Miracle Mile.

As Alternative 2 would provide 228 residential units (120 fewer residential units than the Project), Alternative 2 would only partially meet the following Project objectives based on the reduction in the number of residential units and the modified design in order to retain the existing building:

- Promote smart growth by locating in-fill residential and community-serving commercial uses, near public transit lines (Metro Rail and Bus), and employment centers, thereby reducing vehicle miles traveled (VMT), pollutant emissions, and greenhouse gas emissions.
- Contribute housing toward the City's Regional Housing Needs Assessment (RHNA) allocation.
- Provide residential units and ground floor commercial uses that generate local tax revenues.
- Create a pedestrian friendly environment and activate the ground floor street frontages by providing pedestrian amenities such as landscaped areas with benches and ground floor commercial uses.

Alternative 2 would not meet the following objective:

- Provide a mix of residential units for varying income levels, including units reserved for Very Low Income households.

### c) Environmentally Superior Alternative

Alternative 1 (the No Project Alternative) would be environmentally superior to the Project, since this alternative would avoid the Project's significant and unavoidable impacts with respect to historical resources and construction noise and vibration. However, as described previously, Alternative 1 would not achieve any of the Project objectives.

In accordance with *CEQA Guidelines* Section 15126.6(e), if the environmentally superior alternative is the "no project" alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives. Alternative 2 would avoid the Project's significant and unavoidable impact with respect to historical resources, but would still result in the same significant and unavoidable human annoyance vibration impact during construction as the Project. Therefore, Alternative 2 would be considered the Environmentally Superior Alternative.

**Table V-2  
Project and Alternatives Impact Comparison**

| <b>Impact Area</b>  | <b>Project Impact Level</b> | <b>Alternative 1 Impact Level</b> | <b>Alternative 2 Impact Level</b> |
|---|-----------------------------|-----------------------------------|-----------------------------------|
| Cultural Resources<br><i>Historical Resources</i>   | S/U                         | NI                                | NI                                |
| Noise   |                             |                                   |                                   |
| <i>Construction Noise</i>   | LTS-M                       | NI                                | LTS-M                             |
| <i>Construction Vibration</i>   | S/U                         | NI                                | S/U                               |
| <i>Operational Noise</i>  | LTS                         | NI                                | LTS                               |
| <i>Operation Vibration</i>  | LTS                         | NI                                | LTS                               |
| NI = no impact<br>LTS = less than significant impact<br>LTS-M = less than significant impact with implementation of mitigation measures<br>S/U = significant and unavoidable impact |                             |                                   |                                   |