CHAPTER 5
ALTERNATIVES

CEQA requires that an EIR describe a range of reasonable alternatives to a proposed project that would feasibly attain most of the basic objectives of the project but would avoid or lessen any significant environmental impacts. EIRs are also required to evaluate the comparative merits of the alternatives. This chapter of the EIR describes and evaluates project alternatives and implements the requirements set forth in the CEQA Guidelines for alternatives analysis. This chapter also identifies the Environmentally Superior Project Alternative as required by CEQA Guidelines Section 15126.6(e)(2).

5.1 SELECTION OF ALTERNATIVES

The range of alternatives and methods for selection is governed by CEQA and applicable CEQA case law. As stated in CEQA Guidelines Section 15126.6(a), the lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. This chapter includes the range of project alternatives that have been selected by the lead agency (in this case, the City) for examination, as well as its reasoning for selecting these alternatives.

As stated in Section 15126.6(a) of the CEQA Guidelines, there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason. This rule is described in Section 15126.6(f) of the CEQA Guidelines and requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. As defined in Section 15126.6(f), the rule of reason limits alternatives analyzed to those that would avoid or substantially lessen one or more of the significant effects of a project. Of those alternatives, an EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project. Other relevant provisions set forth in the CEQA Guidelines state that EIRs do not need to consider every conceivable alternative to a project, nor are they required to consider alternatives that are infeasible. Because the proposed project would not result in any significant and unavoidable effects to the environment, the range of alternatives that was selected for analysis in this EIR includes those that would result in reduced impacts when compared to those of the proposed project, even though those impacts have been identified as less than significant.

5.1.1 Proposed Project

As described above, the project objectives and the significant impacts of a project are key determiners of the alternatives that are initially examined by the lead agency and the alternatives that are ultimately carried forward for detailed analysis in an EIR. To that end, this subsection includes (a) a summary of the proposed project's characteristics to facilitate comparison between

the proposed project and its alternatives, (b) the list of project objectives, and (c) a summary of the project's significant impacts.

Project Summary

Table 5-1 includes a summary of the multi-use hotel building and subterranean parking garage that would be developed.

Table 5-1
Proposed Project Characteristics

Area of Proposed Site Uses in Square Feet (sf)	Hotel Rooms	97,550
	Hotel Retail	11,725
	Non-Hotel Retail	14,605
	Hotel Restaurants	18,455
	Non-Hotel Restaurants	18,960
	Hotel Outdoor Dining	1,910
	Non-Hotel outdoor dining	17,825
	Hotel meeting spaces	13,220
	Nightclub	3,780
	Gym	2,800
	Spa	1,900
	Back-of-House Areas	19,030
	Lobby and Circulation	56,755
	Design Showroom	10,325
	Total Floor Area	**262,315**
Hotel Rooms	241 rooms	
Parking	Approximately 1,151 parking spaces and 7 off-loading spaces would be provided in a subterranean garage, which would be shared among the site uses. Of the 1,151 spaces, 737 would be located below the project site and 414 would be located below the park site.	
Building Height	3 stories to 9 stories (aboveground)	

Project Objectives

As described in Chapter 2 of this EIR, the project objectives include the following:

- Contribute to the City's goal of expanding and enhancing the Design District as a national and international destination for high-end arts and design studios, offices, and related businesses.
- Increase the number of guestrooms on the City's Westside and respond to the need for additional guestrooms and event/conference space within walking distance of the

businesses and nightlife within the City's Design District, the Pacific Design Center, and the Santa Monica Boulevard West District.

- Enhance pedestrian connections within the Design District and create a pedestrian paseo in a manner consistent with the *West Hollywood Design District Streetscape Master Plan*.
- Expand the availability of space for a variety of eclectic stores, restaurants, and entertainment venues in a vibrant, pedestrian-oriented, village-like setting that will serve visitors and residents throughout the day and night, further activating the west side of the City at the confluence of the Design District and the Santa Monica Boulevard West District.
- Redevelop and revitalize an underutilized site in a manner that maximizes development potential and exemplifies thoughtful urban in-fill design.
- Substantially expand the availability of off-street parking available to the general public and businesses in the immediate vicinity of the Design District and Santa Monica Boulevard West District in the most cost-effective manner, most importantly during the daytime hours and for special City events.
- Create a public outdoor gathering space, provide improved landscaping, and provide improved streetscape on Robertson Boulevard in a manner consistent with the *West Hollywood Design District Streetscape Master Plan*.
- Provide new permanent jobs and temporary construction jobs through redevelopment of an urban in-fill site.
- Generate new tax revenues, helping to secure a strong and continuous tax base and maximizing the direct and indirect fiscal and economic benefits for the City and the area.

Environmental Impacts of the Proposed Project

As discussed in detail in Chapter 3, Environmental Analysis, and in Chapter 4, Cumulative Impacts, the proposed project would not result in significant, unavoidable impacts. Impacts for all environmental categories were determined to be "less than significant with mitigation incorporated," "less than significant," or "no impact."

5.1.2 Alternatives Considered But Rejected

One of the requirements for alternatives analysis that is set forth in the CEQA Guidelines is identification of alternatives that were considered by the lead agency but rejected as infeasible during the scoping process. As stated in Section 15126.6(c) of the CEQA Guidelines, the EIR should briefly explain the reasons underlying this determination. Among the factors that may be used to eliminate alternatives from detailed consideration in the EIR are:

(i) Failure to meet most of the basic project objectives,

(ii) Infeasibility, or

(iii) Inability to avoid significant environmental impacts (CEQA Guidelines Section 15126.6(c)).

Section 15126.6(f)(1) of the CEQA Guidelines states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." However, as stated in this subsection, no one of these factors establishes a fixed limit on the scope of reasonable alternatives.

In accordance with 15126.6(c) of the CEQA Guidelines, a reasonable range of alternatives was considered. Several of these alternatives were rejected from further analysis due to one or more of the above reasons. A description of each alternative and the rationale for rejection is provided below.

Alternative Sites

Pursuant to Section 15126.6(f)(2) of the CEQA Guidelines, the City considered the potential for alternative locations to the project. As stated in Section 15126.6(f)(2)(A), the key question and first step in analyzing alternative sites is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered in the EIR. While there are no significant and unavoidable impacts associated with the proposed project, development of the project on another site in the City would not substantially lessen or avoid the impacts of the proposed project. For example, development of the proposed project on an alternate site would result in a similar construction scenario, similar quantities of criteria air pollutant emissions during construction, similar levels of construction noise, and similar levels of energy consumption. Due to the generally built-out nature of the City and the presence of a variety of sensitive receptors throughout the City, it is unlikely that an alternate site would be situated far enough from sensitive receptors to substantially lessen the air quality and noise impacts of the proposed project during construction. Similarly, development at an alternate site would not necessarily reduce impacts to transportation and traffic, as such impacts could merely be relocated to other intersections within the City. Regardless of its location, the project would generally place similar demands on public services, utilities services, and energy resources. For these reasons, use of an alternative site would not likely result in a substantial reduction in the impacts of the project. Alternative sites were ultimately rejected from further analysis in the EIR due to failure to meet project objectives, infeasibility, and inability to avoid significant environmental impacts.

Infeasibility. There are sites within the City of an approximately equivalent size to the project site that could be redeveloped with a multi-use hotel project; however, the project applicant does not control another commercial site within the City of comparable land area. One of the factors for feasibility of an alternative is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." Because the City is highly urbanized and is largely built out, obtaining another site of a similar size within the Design District is not considered feasible. Furthermore, the project site was selected for development of a multi-use hotel due to its location within the Design District and the demand for hotel guestrooms in this area. Relocating the project outside of this area would undermine the function, utility, and financial viability of the project.

Failure to Meet Objectives. Furthermore, use of alternative sites would fail to achieve many of the project objectives, some of which are dependent on the location of the project. If the project were not located within the Design District, it would not meet the objective of expanding and enhancing the Design District as a national and international destination for arts and design studios, offices, and related businesses. If the project were not located on the City's Westside within walking distance of businesses in the Design District and the Santa Monica Boulevard West District, including the Pacific Design Center, the project would fail to meet the objective of increasing the number of guestrooms available in this area. The objective of creating a pedestrian paseo consistent with the Streetscape Master Plan further narrows the location of the project to the locations of the pedestrian paseos identified in the Streetscape Master Plan, which consist of five different potential paseos distributed between Robertson Boulevard to the east and Doheny Drive to the west. The sites of the two westernmost paseos are being developed with the Melrose Triangle project, which includes a pedestrian paseo. The location between Almont Drive and La Peer Drive is being partially developed with the La Peer Hotel. There is one location between Robertson Boulevard and La Peer Drive in addition to the proposed project that contains a potential pedestrian paseo identified in the Streetscape Master Plan, just south of the proposed project site. The applicant does not control the properties through which that potential paseo extends; as such, it would not be possible for this project to establish a paseo in that location. Therefore, none of the other locations for pedestrian paseos identified in the Streetscape Master Plan are feasible locations for the project. As such, an alternative location would not achieve the objective of creating a pedestrian paseo in a manner consistent with the Streetscape Master Plan. Furthermore, the project site is located at the confluence of the Design District and the Santa Monica Boulevard West District, allowing the project to achieve the objectives of expanding space for stores, restaurants, entertainment, and parking in this area. A project that is not located near the borders of these two districts would not achieve these objectives. A project that is not located along Robertson Boulevard would not attain the objective of providing a gathering space, improved landscaping, and improved streetscape along Robertson Boulevard. While there are other parcels along Robertson Boulevard, not all of them are underutilized, and no other parcels

along Robertson Boulevard are controlled by the applicant. For these reasons, alternative sites would fail to attain most of the basic project objectives.

Environmental Impacts. The proposed project would not result in any significant environmental impacts. As such, moving the project to a different site would not avoid or substantially lessen any of the significant impacts of the project, since no significant unavoidable impacts would occur as a result of the project.

Adaptive Reuse Hotel Alternative

Under this alternative, the entire Factory building would be retained on the site and would be converted from its current uses as a nightclub, restaurant, and gym to a hotel use. With this alternative, the other existing buildings on the project site would still be demolished and replaced with new commercial buildings. The retractable bollards would still be put in place and some subterranean parking would still be constructed underneath the project site and West Hollywood Park. The pedestrian paseo would still be constructed; however, it would be realigned to avoid the Factory building and shifted over 100 feet to the north of its location under the proposed project. This alternative would reduce impacts to cultural resources because the entirety of the Factory building would remain in place and because less ground disturbance would occur on the site, thereby lessening the potential for previously unknown, buried cultural resources to be uncovered during construction. This alternative would also reduce impacts in the categories of air quality, noise, and energy consumption. Retaining the entirety of the Factory building at the site would lessen the intensity of construction, potentially reducing construction-related air quality and noise impacts, as well as construction-related energy consumption. Retaining the entirety of the Factory building would also result in reduced land use intensity on the site when compared to the proposed project, thereby reducing operational air emissions, noise, traffic generation, and energy consumption. While this alternative would lessen some of the project's impacts, the Adaptive Reuse Hotel Alternative was subsequently rejected from detailed consideration in the EIR because it would be infeasible to implement. Additionally, it would fail to meet some of the project objectives and would not meet others to the same degree as the proposed project, and it would not avoid significant environmental impacts.

Infeasibility. It is not expected that the Factory building can be brought up to the fire and life-safety regulations that are required for hotels. The building is a standardized prefabricated steel industrial building that was customized for the property using catalog-selected components. These prefabricated buildings were designed for general manufacturing industries and consisted of prefabricated shells with a cavernous interior. While this design has allowed for flexibility in the land uses that have occupied the building from the 1920s to the present, its uses have consisted of industrial, commercial, and restaurant uses. Converting the structure to a livable area with enough hotel rooms to justify the project, while at the same time retaining the building's

historic integrity, would not be feasible. As such, reusing the Factory building as a hotel is not feasible, and this alternative was rejected from further consideration.

Failure to Meet Objectives. While this alternative would still involve construction of a pedestrian paseo, the paseo would be aligned to the north of its proposed location, as explained above. This location would not be consistent with the location of the paseo shown in the Streetscape Master Plan. As such, this alternative would fail to attain the objective of creating a pedestrian paseo in a manner consistent with the Streetscape Master Plan. All other objectives could be attained by this alternative, but to a lesser extent than the proposed project. For example, aligning the pedestrian paseo to the north of its proposed location would create an inefficient pedestrian connection. As described in the Streetscape Master Plan, a walkable block length is 200 to 300 feet (City of West Hollywood 2014). The block that extends along Roberson Boulevard from Santa Monica Boulevard in the north to Melrose Avenue in the south is 1,000 feet long. The block that extends along La Peer Drive from Santa Monica Boulevard in the north to Melrose Avenue in the south is 800 feet long. A pedestrian paseo aligned to the north of its proposed location would be less effective at creating walkable block segments along Robertson Boulevard and La Peer Drive, since it would be located nearly adjacent to Santa Monica Boulevard. As such, this alternative would be less effective at enhancing pedestrian connections in the Design District. Additionally, converting the Factory building into a hotel instead of developing a new multi-use hotel structure on the site would equate to significantly fewer hotel rooms, fewer off-street parking spaces, fewer permanent jobs, less commercial space, and less tax revenue relative to the proposed project. Furthermore, this alternative would not redevelop and revitalize the project site in a manner that maximizes development potential to the same extent as the proposed project. As such, while this alternative was determined to be infeasible, it would also fail to meet certain project objectives and would meet others to a much lesser degree than the proposed project.

Environmental Impacts. The proposed project would not result in any significant environmental impacts. As such, the Adaptive Reuse Hotel Alternative would not avoid or substantially lessen any of the significant impacts of the project, since no significant unavoidable impacts would occur as a result of the project.

Adaptive Reuse of Existing Commercial Buildings Alternative

This alternative proposes to retain the existing buildings on the project site and establish new commercial land uses within those buildings. Under this alternative, no new permanent development would occur on the project site and the existing buildings, including the Factory building, would be modified for new land uses. The existing restaurant, nightclub, gym, design showroom, and retail uses would be replaced with other allowable land uses, consisting of approximately 10,325 square feet of design showroom, approximately 12,950 square feet of restaurants, and approximately 18,804 square feet of banquet/meeting space. Additionally, the

existing 5,802–square foot retail spaces would remain. The existing surface parking lots would be retained and no new parking would be constructed either on site or under West Hollywood Park. A pedestrian paseo would not be created through the project site. However, retractable bollards would still be installed within Robertson Boulevard to create a gathering space. This alternative would reduce impacts to cultural resources because the entirety of the Factory building would remain in place and because less ground disturbance would occur on the site, thereby lessening the potential for previously unknown, buried cultural resources to be uncovered during construction. This alternative would also reduce impacts in the categories of air quality, noise, and energy consumption. Retaining the existing buildings at the site would lessen the intensity of construction, reducing the construction-related air quality, noise, and energy consumption impacts when compared to the proposed project. Retaining the existing buildings on the project site would also reduce land use intensity on the site when compared to the proposed project, thereby reducing operational air emissions, noise, traffic generation, and energy consumption. This alternative would also reduce the project's impacts to West Hollywood Park, since no construction would occur within the park site under this alternative and no pedestrian exit/entrance structures would be constructed within the park site. While this alternative would lessen some of the project's impacts, it was rejected from further analysis in the EIR due to its failure to meet most of the basic project objectives and inability to avoid significant environmental impacts.

Failure to Meet Objectives. An adaptive reuse commercial project would fail to meet most of the basic project objectives. It would not increase the number of guestrooms; it would not enhance pedestrian connections or create a pedestrian paseo; it would not expand the availability of space for eclectic stores, restaurants, and entertainment venues; it would not substantially expand the availability of off-street parking; it would not provide as many new permanent jobs as the proposed project; and, it would fail to generate as much tax revenue as the proposed project. Additionally, it would not redevelop or revitalize an underutilized site. While new commercial uses would have the potential to enhance the Design District, this alternative would not meet this objective to the same degree as the proposed project. For these reasons, this alternative fails to meet most of the project objectives and is therefore rejected from further consideration.

Environmental Impacts. The proposed project would not result in any significant environmental impacts. As such, adaptively reusing the on-site buildings would not avoid or substantially lessen any of the significant impacts of the project, since no significant unavoidable impacts would occur as a result of the project.

Multi-Family Residential Project

Under this alternative, all existing structures on the project site would be demolished and replaced with a multi-family residential building. Under this alternative, some subterranean

parking may be developed on the project site to support the residential uses. However, no parking would be developed underneath West Hollywood Park. Furthermore, the proposed pedestrian paseo would not be constructed and the proposed retractable bollards would not be installed along Robertson Boulevard, as a pedestrian paseo and an adjacent public gathering space would be incompatible with the residential uses. However, a multi-family residential project was rejected from further analysis in the EIR due to infeasibility and failure to meet objectives. This alternative would reduce the project's effects to West Hollywood Park, since no construction would occur at the park site and no pedestrian exit/entrance structures would be installed at the park site. However, this alternative would result in increased impacts to cultural resources, since the Factory building would be removed from the site in its entirety. It may also result in increased impacts to public services, since it would increase the residential population of the City, thereby resulting in increased demand for fire, police, park, and library services. The other impacts of the project, such as air emissions, noise, traffic, and energy consumption are not expected to be substantially lessened or avoided by constructing a multi-family residential structure at the project site, since the land use intensity would likely be the same or greater than that of the proposed project. This alternative was ultimately rejected from further analysis in the EIR due infeasibility, failure to meet project objectives, and inability to avoid significant environmental impacts.

Infeasibility. One of the factors for feasibility of an alternative is site suitability. Due to the location of the project site, it is not considered suitable for a 100% residential project. Specifically, complete residential use of the site would be incompatible with restaurant and entertainment businesses in the immediate vicinity. Furthermore, the project site is within commercial zoning districts and General Plan land use designations (CN2 along Robertson Boulevard and CC2 along La Peer Drive). Development of residential uses within the CN2 zoning district is prohibited and development of residential uses is only allowable in the CC2 zoning district if it is incorporated into a mixed-use development (City of West Hollywood Municipal Code, Chapter 19.10). As such, development of a 100% residential use on the project site would be inconsistent with the land use designations for the site, without a General Plan amendment and a zone change. One of the factors for feasibility of an alternative is general plan consistency.

Failure to Meet Objectives. A multi-family residential project would fail to meet most of the basic project objectives. It would not contribute to the expansion of the Design District as a destination for high-end arts and design studios, offices, and related businesses; it would not increase the number of guestrooms; it would not enhance pedestrian connections or create a pedestrian paseo; it would not expand the availability of space for eclectic stores, restaurants, and entertainment venues; it would not substantially expand the availability of off-street parking, since the parking would be used by residents of the project; it would not create a public outdoor gathering space along Robertson Boulevard; it would not provide as many new permanent jobs as the proposed project; and, it would fail to generate as much tax revenue as the proposed project.

For the reasons described above, this alternative was rejected from further consideration because it is not considered feasible and because it would fail to meet most of the basic project objectives.

Environmental Impacts. The proposed project would not result in any significant environmental impacts. As such, constructing a multi-family residential project at the project site would not avoid or substantially lessen any of the significant impacts of the project, since no significant unavoidable impacts would occur as a result of the project.

Construct New Hotel and Retain the Factory Building in Current Location

This alternative would entail constructing a multi-use hotel building and retaining the Factory building on site in its current location. This alternative would develop the same types of uses and the same square footages per use as the proposed project. As with the proposed project, this alternative would include three levels of subterranean parking on the hotel site and two levels of subterranean parking below the western portion of West Hollywood Park. This alternative would also include the retractable bollards in Robertson Boulevard. The pedestrian paseo would still be constructed; however, it would be realigned to avoid the Factory building and shifted over 100 feet to the north of its location under the proposed project. However, because the Factory building would remain on the site and a pedestrian paseo would still be developed, the suitable building area for the multi-use hotel building would be greatly reduced, requiring a much taller building to accommodate the proposed uses. This alternative would reduce impacts to cultural resources because the entirety of the Factory building would remain in place and because less ground disturbance would occur on the site, thereby lessening the potential for previously unknown, buried cultural resources to be uncovered during construction. Because this alternative would develop the same types of uses and the same square footages as the proposed project, impacts in the other categories (air quality, noise, traffic, public services, etc.) would remain generally the same. Additionally, impacts in the categories of aesthetics and land use could potentially increase relative to the proposed project, since this alternative would involve construction of a taller multi-use hotel building. This alternative was rejected from further analysis in the EIR due to infeasibility. Additionally, it would fail to meet the objective of constructing a pedestrian paseo consistent with the Streetscape Master Plan. And, as described above under the "Adaptive Reuse Hotel Alternative," alignment of a pedestrian paseo to the north of its proposed location would result in an inefficient pedestrian connection due to the close proximity of Santa Monica Boulevard. As such, while infeasibility is the primary reason for rejection, this alternative also fails to fully implement the key project objectives involving the pedestrian paseo and would not avoid any significant environmental impacts of the proposed project.

Infeasibility. Constructing the proposed multi-use hotel building on the site while retaining the Factory building would be infeasible. The Factory building is located in the approximate center

of the project site and extends from the east boundary of the site to the west boundary, bifurcating the site. Due to the size of the Factory building and its orientation relative to the rest of the project site, designing a cohesive, functional multi-use hotel building around the Factory building would not be feasible. The Factory building divides the site into two distinct portions, neither of which could support an effective, viable development. Furthermore, the design of the proposed project is centered around the creation of a pedestrian paseo that establishes an effective pedestrian connection between Robertson Boulevard and La Peer Drive. Designing the multi-use hotel building around the Factory building would preclude the creation of this pedestrian connection as envisioned in the Streetscape Master Plan. As such, this alternative was rejected from further consideration due to its infeasibility.

Environmental Impacts. The proposed project would not result in any significant environmental impacts. As such, this alternative would not avoid or substantially lessen any of the significant impacts of the project, since no significant unavoidable impacts would occur as a result of the project.

Relocate Factory Building Off-Site Alternative

Under this alternative, the project would be developed exactly as proposed, except the Factory building would be relocated to another site. Under this alternative, the Factory building would be disassembled during construction and a portion of the building would be reconstructed on an approximately 6,000 square-foot site located at 148 North Swall Drive in the City. The reconstructed Factory building would contain approximately 9,600 square feet of retail uses; 3,000 square feet of restaurant uses; and 8,250 square feet of residential uses for a total building area of approximately 20,850 square feet. The reconstructed Factory building would be four stories in height with a clearstory.

The 148 North Swall Drive site is currently within a multi-family residential zoning district and is located within a multi-family residential neighborhood. Reconstructing the Factory building on the 148 North Swall Drive site would require a General Plan amendment and zone change to revise the existing designation on the 148 North Swall Drive parcel to be within the CC2 zoning district with a Mixed-Use Overlay. While this designation would be consistent with parcels to the north of the 148 North Swall Drive site, it would be inconsistent with the multi-family residential uses to the south, west, and east.

Under this alternative, all components of the proposed project would remain the same, except a portion of the Factory building would not be retained on site and integrated into the project. The multi-use hotel building would be constructed on the project site, and the proposed subterranean parking garage would be the same as proposed by the project. This alternative would also include the retractable bollards in Robertson Boulevard, as well as the pedestrian paseo. Both of these

features would be established generally in the same location and manner as proposed by the project. Because the proposed multi-use hotel building would still be constructed, this alternative would attain all of the project objectives. However, several issues involving the feasibility of the 148 North Swall Drive parcel are presented below, and this alternative was rejected because it would not avoid any significant environmental impacts of the proposed project.

Infeasibility. The applicant currently controls the 148 North Swall Drive parcel and the site is currently vacant, so no existing uses would be displaced by the relocated Factory building. However, as indicated above, this alternative would require the land use designations of the 148 North Swall Drive parcel to be changed from residential to commercial. Without a General Plan amendment and a zone change for the 148 North Swall Drive parcel, this alternative would not be consistent with the General Plan. One of the factors for feasibility of an alternative is general plan consistency. Another factor for feasibility is site suitability. The project site is located at the northern boundary of a multi-family residential neighborhood. While a mixed-use development contained within the Factory building would be compatible with the land uses to the north, it would not be compatible with the residential uses to the south. As such, while relocating the Factory building to 148 North Swall Drive is feasible from a technical standpoint (Truscon Steel buildings are prefabricated shells with cavernous interiors designed to allow for reconfiguration), the site presents land use consistency and compatibility issues.

Environmental Impacts. Because the multi-use hotel building would be developed on the project site, the same air quality, noise, and traffic impacts would result during construction of this alternative. Further, additional traffic impacts could result from the incorporation of new uses into the relocated Factory building at its new site. In addition, relocating the Factory building would result in increased impacts to cultural resources, as it would cause a significant unavoidable impact to historical resources. The Factory building is a significant historical resource in part due to its association with industrial development in West Hollywood. The building was located in an industrial area of West Hollywood adjacent to the Sherman Yards that supported the manufacturing needs of the motion picture industry during its "Golden Age." While surrounding land uses are now primarily commercial and the Sherman Yards no longer exists (it is now the Pacific Design Center), the location of the Factory building in what was historically an industrial district is integral to its ability to tell part of the story of West Hollywood's industrial history. The Factory building is also significant for its association with Studio One and the Backlot Theatre, a dance club that catered specifically to the gay community from 1974–1992. Studio One's location in an industrial district south of Santa Monica Boulevard rendered it both "off the beaten path" (on a side street in a largely unoccupied industrial building) and also near the vibrant commercial uses and numerous gay bars on Santa Monica Boulevard. Dismantling the Factory building and placing it in a multi-family residential neighborhood would eliminate its integrity of location and would compromise the integrity that it has retained for its association with historic industrial development and LGBT cultural

development in West Hollywood, as well as its integrity of feeling. While it is possible that the City of West Hollywood could still consider the relocated Factory building to be eligible for designation as a local historic resource under the City's Cultural Preservation Ordinance, the relocated Factory building would no longer qualify for designation under the California Register. Therefore, relocating the Factory building would result in a significant and unavoidable impact to cultural resources, thereby increasing the impacts of the project. This alternative was rejected from further consideration because it would result in a new significant and unavoidable impact to historical resources and would not otherwise reduce impacts at the multi-use hotel building site. Because the proposed project would not result in any significant environmental impacts, this alternative would not avoid or substantially lessen any of the significant impacts of the project.

Conformance to Existing Zoning Alternative

Under this alternative, a hotel would be developed on the project site that conforms to the existing zoning requirements. The portion of the project site fronting La Peer Drive is approximately 27,016 square feet in area and is zoned CC2. The allowable FAR in the CC2 zoning district is 2.0 and the maximum building height is 45 feet (4 stories). The portion of the project site fronting Robertson Boulevard is approximately 57,490 square feet in size and is zoned CN2. On this portion of the site, under the CN2 zoning regulations, the allowable FAR is 1.0 and the maximum building height is 25 feet (2 stories). Hotels are not allowable within the CN2 zone. Under existing zoning regulations, a 54,032–square foot building could be constructed along La Peer Drive in the CC2 zone, and a 57,490–square foot building could be constructed along Robertson Boulevard in the CN2 zone. Additional area (0.1 FAR) can be added to each portion of the site if the building is designed to achieve at least 90 points on the West Hollywood Green Building Point System. A specific plan would not be required for the site to establish consistency between the existing site uses and land use designations, since this alternative would conform with the underlying land use designations.

Based on the zoning constraints described above, the hotel would be developed on the La Peer Drive portion of the site, since hotels are allowed on that portion of the site. The hotel would have a building area of approximately 56,734 square feet (site size [27,016 square feet] × allowable FAR [2.1]) and would be 45 feet in height (4 stories), as allowed in the CC2 zoning district. The hotel would include 100 rooms, a 2,000 square foot restaurant, outdoor dining areas, a lounge, meeting spaces, and spa/fitness facilities. On the Robertson Boulevard portion of the site, a commercial building would be constructed. The building would be 63,239 square feet (site size [57,490 square feet] × allowable FAR [1.1]) and would be 25 feet in height (2 stories), as allowed in the CN2 zoning district. This building would include retail, restaurants, and design showrooms. The combined building area of the hotel building and commercial building would be 119,973 square feet. Two levels of subterranean parking would be constructed below the project site, providing 445 parking spaces. No parking would be constructed beneath West Hollywood

Park. The pedestrian paseo would not be constructed through the project site. This alternative would still include the installation of retractable bollards in Robertson Boulevard to create a public gathering space. This alternative would also include partial retention of the Factory building. However, the design of the retained Factory building may differ slightly from that of the proposed project, as the Factory building would need to be designed in accordance with existing zoning requirements.

Because this alternative would involve development of similar types of land uses on the same site as the proposed project, the types of impacts would be similar to those of the proposed project. However, these land uses would be developed at a lower intensity. The building developed under this alternative would be 50% smaller than the proposed project, 141 fewer hotel rooms would be developed, and less retail and restaurant square footage would be developed, equating to an overall decrease in air emissions, resource use, demand for public services and utilities, noise production, and traffic generation. As such, the degree of most of the impacts identified for the proposed project would be slightly or substantially reduced under this alternative. Although some of the impact determinations may change, this alternative would not reduce or avoid any significant impacts associated with the proposed project, since no significant unavoidable impacts would occur as a result of the project. This alternative was rejected from further analysis in the EIR due to failure to meet project objectives, infeasibility, and inability to avoid significant environmental impacts.

Failure to Meet Objectives. This alternative would meet project objectives, to a lesser degree than the proposed project. Because this alternative would still expand the intensity of land uses on the project site and the types of services available on the site, it would still contribute to the City's goal of expanding and enhancing the Design District as a national and international destination for high-end arts and design studios, offices, and related businesses. However, it would provide less space for these uses than the proposed project. Furthermore, while it would still increase the number of guestrooms available on the City's Westside, it would not accomplish this objective to the same degree as the proposed project, since this alternative would develop 100 guestrooms instead of 241, as proposed under the project. While this alternative would redevelop and revitalize the site, it would not accomplish this objective to the same degree as the proposed project. In addition to developing the site with less square footage, this alternative would result in a less cohesive design, since the commercial and hotel uses would be distinctly divided across the CC2 and CN2 zoning district. In the absence of the pedestrian paseo, the building façade would extend continuously across the site's street frontages, thereby offering less opportunity for pedestrian interaction and visual interest. While this alternative would still expand the availability of off-street parking, it would not do so to the same degree as the proposed project, as it would develop 706 fewer spaces, as compared with the proposed project (1,151 – 445 = 706). While the project would still provide new jobs and tax revenue, the number of jobs and the amount of tax revenue would be less under this alternative, as compared

with the proposed project. This is because the land use intensity on the site would be lower. This alternative would still meet the objective of developing a public outdoor gathering space, providing improved landscaping, and providing improved streetscape design on Robertson Boulevard in a manner consistent with the Streetscape Master Plan. However, this alternative would fail to meet the objective of developing a pedestrian paseo consistent with the Streetscape Master Plan, since no pedestrian paseo is proposed as part of this alternative.

Infeasibility. The applicant has indicated that development of a mixed-use hotel project that conforms with the site's underlying zoning designations while retaining and rehabilitating a portion of the Factory building would not be economically viable. This alternative would not provide enough guest rooms, retail space, or restaurant space to support the overall cost of developing the project, particularly given the costs associated with rehabilitating the Factory building.

Environmental Impacts. The proposed project would not result in any significant environmental impacts. As such, this alternative would not avoid or substantially lessen any of the significant impacts of the project, since no significant unavoidable impacts would occur as a result of the project.

5.2 ALTERNATIVES CARRIED FORWARD FOR CONSIDERATION

Pursuant to Section 15126.6 of the CEQA Guidelines, the City selected a reasonable range of alternatives to the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen one or more of the significant effects of the project. As discussed above, the project would not result in any significant and unavoidable environmental effects, and therefore alternatives are not required to avoid or substantially lessen any such effects. Nevertheless, based on the evaluation of potential alternatives that were considered but rejected in Section 5.1.2 above, two alternatives have been carried forward for further analysis below. Pursuant to Section 15126.6(d) of the CEQA Guidelines, sufficient information about each alternative has been included in the descriptions below to allow meaningful evaluation, analysis, and comparison with the proposed project.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives is required to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. While no significant and unavoidable impacts have been identified in association with the proposed project, the alternatives presented below would avoid or substantially lessen at least one of the less-than-significant impacts of the proposed project that have been identified in Section 3.0 of this EIR.

5.2.1 Alternative 1 – No Project Alternative

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate the specific alternative of "no project" along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. As specified in Section 15126.6(e)(3)(B) of the CEQA Guidelines, the no project alternative for a development project consists of the circumstance under which a proposed project does not proceed. Section 15126.6(e)(3)(B) further states that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, Alternative 1 assumes the proposed project would not proceed, no new permanent development or land uses would be introduced within the project site, and the existing environment would be maintained. The existing uses would continue to operate as they do currently. The existing surface parking lots would be retained and no new parking would be constructed either on site or under West Hollywood Park. A pedestrian paseo would not be created through the project site, and no retractable bollards would be installed within Robertson Boulevard to allow for creation of a gathering space.

Ability to Meet Project Objectives

The No Project Alternative would not achieve any of the project objectives. It would not contribute to the City's goal of expanding and enhancing the Design District, it would not increase guestrooms, commercial space, or off-street parking. It would not enhance pedestrian connections relative to existing conditions. It would fail to create a pedestrian paseo or a public gathering space consistent with the Streetscape Master Plan. It would also fail to redevelop and revitalize an underutilized site, would not provide new jobs, and would not generate new tax revenues.

Comparison of the Effects of Alternative 1 to the Proposed Project

Construction impacts associated with the proposed project would be avoided because no development would occur on the project site under the No Project Alternative. The existing structures would remain in place and the existing uses would continue to operate in their current capacity and function. Maintenance activities would occur as needed to maintain the existing facilities. There would be no change to cultural resources because the Factory building would be retained in place. Further, the potential for uncovering previously unknown archaeological or paleontological resources would be avoided because excavation would not take place. Construction-related air quality impacts, noise impacts, traffic impacts, and energy consumption impacts would not occur, since construction activities associated with the proposed project would not occur on the site.

Operational impacts associated with the proposed project would be avoided because no changes to the project site would occur. The height, massing, and lighting of buildings on the project site would remain the same. As such, no aesthetic impact would result. The number of vehicle trips to/from the project site would not be expected to change because the same uses would be operating at the project site. Thus, no increase in mobile emissions, vehicular noise, traffic, or petroleum consumption would be expected to occur. Because the land use intensity of the site would remain the same as existing conditions, the water usage, sewage generation, and need for other public services and utilities would not increase. Additionally, a specific plan would not be required for the site to establish consistency between the existing site uses and land use designations, since the existing uses are in compliance with the CC2 and CN2 site designations. However, the proposed project includes elements that would implement certain land use plans and policies that have been established for the project site and project area. This includes plans for a pedestrian paseo extending through the project site, plans for a public gathering space on Robertson Boulevard adjacent to the project site, streetscape improvements along Robertson Boulevard and La Peer Drive, and increased opportunities for parking once and then walking around the Design District. The No Project Alternative would fail to implement these land use policies for the project site. However, with the exception of failing to implement certain land use plans and policies, the No Project Alternative would result in decreased environmental impacts relative to the proposed project. Table 5-3 provides a summary of the comparison of the environmental effects of the project to the alternatives presented in this section, including the No Project Alternative.

5.2.2 Alternative 2 – On-Site Parking Garage Alternative

This alternative would be identical to the proposed project with the exception of the subterranean parking. Under this alternative, instead of constructing three levels of subterranean parking on site and constructing two levels of subterranean parking below West Hollywood Park, five levels of subterranean parking would be constructed on the project site, extending 67 feet below the grade level of Robertson Boulevard. The garage would provide 1,152 parking spaces. Under this alternative, no subterranean parking would be built below West Hollywood Park. Refer to Table 5-2 for a summary of the characteristics of this alternative. (Note that the area of proposed site uses are identical to those of the proposed project.) Refer to Appendix K for floorplans of the fully on-site subterranean parking garage. As with the proposed project, a portion of the Factory building would be retained, rehabilitated, and incorporated as part of the design of the multi-use hotel building. This alternative would also include construction of the pedestrian paseo and installation of retractable bollards within Robertson Boulevard, all in the same manner as the proposed project.

Table 5-2
Proposed Project Characteristics

Area of Proposed Site Uses in Square Feet (sf)	Hotel Rooms	97,550
	Hotel Retail	11,725
	Non-Hotel Retail	14,605
	Hotel Restaurants	18,455
	Non-Hotel Restaurants	18,960
	Hotel Outdoor Dining	1,910
	Non-Hotel outdoor dining	17,825
	Hotel meeting spaces	13,220
	Nightclub	3,780
	Gym	2,800
	Spa	1,900
	Back-of-House Areas	19,030
	Lobby and Circulation	56,755
	Design Showroom	10,325
	Total Floor Area	**262,315**
Hotel Rooms	241 rooms	
Parking	Approximately 1,152 parking spaces and 7 off-loading spaces would be provided in a subterranean garage, which would be shared among the site uses. All parking spaces would be located below the project site.	
Building Height	3 stories to 9 stories (aboveground)	

Ability to Meet Project Objectives

This alternative would meet the project objectives, since it would establish a multi-use hotel building on the project site with the same land uses, heights, sizes, and design features as the proposed project. However, this alternative may slightly decrease the extent to which the project meets objectives for circulation and parking. One of the project objectives is to "Substantially expand the availability of off-street parking available to the general public and businesses in the immediate vicinity of the Design District and Santa Monica Boulevard West District in the most cost-effective manner, most importantly during the daytime hours and for special City events." While Alternative 2 includes approximately the same number of parking stalls as the proposed project, the five-level garage would decrease parking through-put times within the parking structure as compared with the proposed two- to three-level garage. Furthermore, the bottom levels of the five-level parking garage would be more time-consuming to access relative to the bottom levels of the proposed two- to three-level garage. A deeper garage could decrease the convenience of the garage, thereby creating a less desirable place for visitors to park once and then walk around various destinations within the Design District.

Comparison of the Effects of Alternative 2 to the Proposed Project

This alternative would develop a multi-use hotel building on the project site in the same manner as the proposed project. The multi-use hotel building that would be developed under Alternative 2 would also have the same land uses, heights, sizes, and design features as the building that would be developed under the proposed project. As such, the types of impacts and the magnitude of impacts would be similar to those of the proposed project. However, Alternative 2 would not involve any construction activities within the park site, thereby eliminating construction-related impacts of the proposed project at the park site. But, because the proposed parking garage on the project would increase in depth, Alternative 2 would increase the amount of excavation activities, thereby increasing the amount of export that would be generated during construction. For comparison, the proposed project would export 46,800 cubic yards of material from the park site and 110,700 cubic yards of material from the project site (see Section 2.5 of this EIR for details). Alternative 2 would not export materials from the park site and would export 180,000 cubic yards of material from the project site. Export from the project site would increase by 69,300 cubic yards under Alternative 2; the combined total export attributable to the proposed project would increase by 22,500 cubic yards under Alternative 2. Additionally, because Alternative 2 would involve deeper excavation at the project site, it may increase impacts related to dewatering. While the amount of export and dewatering rates would increase slightly, changes in construction impacts as compared with the proposed project are considered relatively minimal and would not be substantial enough to either increase or decrease significance determinations for construction-related impacts. The other key difference between Alternative 2 and the proposed project would be the absence of the proposed pedestrian exit/entrance structures within the park site. While no significant and unavoidable impacts were identified in association with the pedestrian exit/entrance structures, the absence of those structures may slightly decrease impacts in several categories (such as aesthetics and land use), although the reduction in the degree of impact would not be substantial enough to change overall impact determinations.

Aesthetics

The absence of project-related construction at the park site would decrease the temporary construction impacts to visual character and quality that are identified in Section 3.1 of this EIR. Construction may still occur at the park site in association with the Phase II Park Master Plan Implementation Project. However, these construction activities would not be associated with the proposed project and would proceed without any increases in construction duration caused by excavation of the subterranean garage at the park site. Any changes in construction duration and excavation depths associated with this alternative would be minor in comparison with the overall construction process at the project site. As such, impacts to visual character and quality during construction maybe slightly reduced but would remain less than significant.

During operation, no pedestrian exit/entrance structures would be present at the park site. While no significant impacts were identified in association with these structures, the elimination of the structures from the project would eliminate any minor changes in visual character or quality, shade/shadow, or generation of light/glare attributable to these structures. All other operational effects of Alternative 2 would be the same as the proposed project, since the proposed multi-use hotel building would be of the same size and design. Impacts would remain less than significant.

Air Quality

This alternative would result in similar construction and operational impacts to air quality. As explained above, no construction within the park site would occur in association with the proposed project. This would eliminate the construction-related effects caused by construction of the subterranean parking garage at the park site and construction of the tunnel under Robertson Boulevard. Conversely, construction at the project site would be more extensive, due to the increased depth of excavation. As a result, the overall amount of export attributable to the project would increase by 22,500 cubic yards, as compared with the proposed project. The amount of export coming from the project site itself would increase by 69,300 cubic yards as compared with the proposed project. As such, the grading/site preparation phase of construction may extend in duration to accommodate the additional excavation processes. Although the duration of air quality impacts would be extended, daily emissions would likely decrease, since maximum daily emissions associated with the proposed project were generated during the overlap of park site grading and hotel site demolition activities. Because this overlap would no longer occur, daily emissions would be expected to decrease relative to the proposed project. During operation, air emissions would be approximately the same as the proposed project since the proposed multi-use hotel building would be of the same size and design as the proposed project. Impacts would remain less than significant for both construction and operation.

Cultural Resources

Impacts to cultural resources would be similar to those of the proposed project. As with the proposed project, potentially significant impacts to historical resources would be reduced below a level of significance through incorporating MM-CUL-1, MM-CUL-2, MM-CUL-3, MM-CUL-4, MM-CUL-5, MM-CUL-6, MM-CUL-7, MM-CUL-8, MM-CUL-9, MM-CUL-10, and MM-CUL-11 (see Section 3.3 of this EIR for details on these measures). The potential to uncover buried archaeological resources, paleontological resources, or human remains at the park site would be eliminated. However, effects to such resources could still occur at the project site. As with the proposed project, impacts could be potentially significant in the event that unknown resources or remains were to be uncovered during excavation. The same mitigation measures provided for the proposed project would reduce these impacts to below a below of significance (MM-CUL-12, MM-CUL-13, and MM-CUL-14; see Section 3.3 of this EIR for these measures).

With implementation of these measures, impacts to archeological resources, paleontological resources, and human remains would be less than significant with mitigation incorporated.

Geology and Soils

Impacts would be similar to those of the proposed project. Alternative 2 would eliminate impacts from the park site, since no subterranean garage would be constructed there. However, the additional depth of the subterranean garage at the project site under Alternative 2 would result in greater hydrostatic pressure on the proposed subterranean garage, as such pressures increase with depth. However, upon implementation of MM-GEO-1, the foundation of the subterranean garage would be designed and constructed to withstand such pressures. Impacts would remain less than significant with mitigation incorporated.

Greenhouse Gas Emissions

During construction, no greenhouse gas emissions would occur at the park site. However, emissions would increase slightly at the project site due to increased construction duration and increased export materials as compared with the proposed project. Under Alternative 2, the amount of export would increase by 22,500 cubic yards as compared with the proposed project, which would equate to additional truck trips during the grading/site preparation phase. However, as with the proposed project, greenhouse gas emissions generated during construction would be short-term in nature, lasting only for the duration of the construction period, and would not represent a long-term source of GHG emissions. Additionally, as explained in Section 3.5 of this EIR, construction greenhouse gas emissions are amortized over 30 years and then added to operational emissions to determine whether a significant impact would occur. A minor increase in export, amortized over 30 years, would not increase total project-generated greenhouse gas emissions such that a significant impact would occur. During operation, the greenhouse gas emissions for Alternative 2 would be similar to those of the proposed project, because the land use intensity of the site would be the same. Similar vehicular emissions and energy use would occur, and the same sustainability measures would be implemented, as characterized for the proposed project in Section 2.4 and Table 3.5-6 of this EIR. For these reasons, both construction and operational impacts would remain less than significant.

Hazards and Hazardous Materials

Impacts would be similar to those of the proposed project. Materials used during construction and operation would be generally the same. No hazardous materials would be used or stored at the park site in association with the proposed project during either construction or operation. However, the absence of such activities and materials from the park site would not change significance levels identified for the project, as such materials would still be used and stored at the project site. Impacts would therefore remain less than significant. While depth of excavation

at the project site would increase, no hazardous wastes sites have been identified beneath the project site, and impacts would remain the same as the proposed project (i.e., less than significant). In contrast to the proposed project, Alternative 2 would not involve construction of a tunnel beneath Robertson Boulevard. As such, effects involving implementation of or physical interference with emergency response plans or evacuation plans would be slightly reduced. However, such effects would not be reduced to the extent that Alternative 2 would have no impact, since construction activities at the project site would still have some potential to effect emergency access due to temporary, intermittent increases in truck traffic in the vicinity. Because the project remains in the same location, impacts involving proximity to schools, airports, and wildland fire hazard areas would remain the same. Impacts to hazards and hazardous materials would remain less than significant.

Hydrology and Water Quality

Impacts would be similar to those of the proposed project. The same water quality standards and waste discharge requirements that would apply to the proposed project would apply to Alternative 2. Alternative 2 would increase construction-related effects to groundwater, because deeper excavation at the project site would increase the rate at which groundwater would be pumped during the anticipated construction dewatering process and would increase the depth of dewatering. Under the proposed project, groundwater would be pumped from the project site at a rate of 100 gallons per minute for the duration of the grading/site preparation phase (approximately 26 weeks) and from the park site at the same rate for a duration of approximately 25 weeks. As such, under the proposed project, groundwater discharge would occur for approximately one year at a rate of 100 gallons per minute. Under Alternative 2, groundwater would be pumped from the project site only, but at a rate of approximately 300 gallons per minute. Additionally, the grading/site preparation phase at the project site would be slightly longer than that of the proposed project. So, under Alternative 2, the discharge flow would increase but the total duration of dewatering activities would decrease, since no dewatering would occur at the park site. As such, it is anticipated that the overall differences in the amount of groundwater that would be discharged would not differ substantially between the proposed project and Alternative 2. As with the proposed project, the amount of groundwater that is pumped and discharged would be negligible relative to the volume of water in the groundwater basin. Temporary extraction under Alternative 2 would not substantially deplete groundwater supplies such that there would be a net deficit in aquifer volume. Groundwater levels would not be affected below the lowest point of excavation, or approximately 76 feet below grade. As with the proposed project, construction dewatering would also be conducted in accordance with applicable requirements of the Los Angeles RWQCB, which could involve coverage under and compliance with the *Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties* (Order No. R4-2013-0095, NPDES No. CAG994004). Impacts involving

groundwater would remain less than significant. Because the land use intensity of the site would be similar to that of the proposed project, water usage and stormwater runoff during operation would remain generally the same. Impacts involving hydrology and water quality would remain less than significant.

Land Use and Planning

The proposed multi-use hotel building would be of the same size, design, and land use intensity as the proposed project. As such, impacts involving the potential for Alternative 2 to divide a community and Alternative 2's consistency with applicable land use plans and policies would be the same as the proposed project (i.e., less that significant). The only difference would be the relationship between the project and the Park Master Plan. Unlike the proposed project, Alternative 2 would not involve any construction or operational effects at the park site. The proposed project would increase the duration of construction at the park site as compared with the construction that would already occur under the approved Phase II Park Master Plan Implementation Project. The proposed project would also involve installation of two pedestrian exit/entrance structures within the park site that were not identified as part of the Phase II Park Master Plan designs. In contrast, Alternative 2 would not involve construction or operation of these structures and would not otherwise change the design or construction duration of Phase II Park Master Plan Implementation at the park site. For this reason, Alternative 2 would slightly reduce land use impacts. While impacts would generally decrease, they would not decrease to the extent that Alternative 2 would have no impact. As described above, all other land use consistency conclusions identified for the proposed project in Section 3.8 would apply to Alternative 2, since the rest of the project is identical to Alternative 2 in terms of size, height, design, and proposed land uses. While impacts would be slightly reduced, they would remain less than significant.

Noise

Alternative 2 would reduce noise impacts to park users during certain construction phases, since no construction would occur at the park site. However, construction at the project site may increase in duration and/or intensity; as such, noise impacts from the project site could slightly increase. However, as with the proposed project, mitigation measures MM-NOI-1 and MM-NOI-2 would reduce potentially significant construction-related noise impacts to below a level of significance (see Section 3.9 of this EIR for details on these mitigation measures). Because Alternative 2 would result in the same types of land uses and similar traffic generation, operational noise impacts would be similar to those of the proposed project. Mitigation measures MM-NOI-3, MM-NOI-4, and MM-NOI-5 would reduce potentially significant operational noise impacts to below a level of significance (see Section 3.9 of this EIR for details on these mitigation measures). As with the proposed project, impacts would be less than significant with mitigation incorporated.

Public Services

Because the types of uses and the proposed land use intensities would be similar to those of the proposed project, impacts to fire protection, police protection, schools, and library services would be generally the same as the proposed project. However, unlike the proposed project, Alternative 2 would not remove the park site from service during construction of the subterranean garage. Elimination of construction activities at the park site would decrease the temporary impacts to recreational facilities in the City that were identified for the proposed project. However, while impacts would decrease, they would not decrease to the extent that Alternative 2 would have no impact, since minor increases in demand for public services, including parks, could still occur under Alternative 2. Public services impacts would be slightly reduced under Alternative 2 but would remain less than significant.

Traffic and Circulation

Operational trip generation for Alternative 2 is anticipated to be identical to that of the proposed project. As shown in Table 5-2, all of the proposed land uses and land use intensities for the project site would remain the same. As with the proposed project, implementation of mitigation measure MM-TRF-1 would reduce potentially significant impacts at the intersection of Robertson Boulevard and Santa Monica Boulevard to below a level of significance.

Construction trip generation for Alternative 2 may differ slightly from that of the proposed project. However, the peak period of construction for Alternative 2 would be the same as for the proposed project (i.e., the Building Construction Phase). To ensure a worst-case-scenario analysis, the traffic study for the proposed project analyzed the effects of the truck trips and worker commute trips that would occur during this phase. As such, the worst-case-scenario construction traffic analysis for the proposed project would apply to Alternative 2. Impacts were determined to be less than significant for the proposed project, and they would remain less than significant for Alternative 2.

Impacts to roadway hazards would be similar to the proposed project, given that similar increases in pedestrian and vehicular activity would occur in the immediate project area. Impacts of Alternative 2 related to operational trip generation would remain less than significant or less than significant with mitigation incorporated.

Utilities and Service Systems

Because the types of uses and land use intensities would be similar to those of the proposed project, impacts to utilities and service systems would be generally the same as the proposed project. Alternative 2 would result in a similar increase in water use and would generate similar quantities of wastewater and solid waste. As with the proposed project, this alternative would not

exceed wastewater treatment requirements or exceed the conveyance or treatment capacity of existing sewage systems or landfills. Impacts would remain less than significant for the same reasons described in Section 3.12 of this EIR.

Energy Consumption

Because the types of uses and land use intensities would be similar to those of the proposed project, energy consumption during construction and operation of Alternative 2 is expected to be similar to that of the proposed project. Impacts would remain less than significant for the same reasons described in Section 3.13 of this EIR.

5.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

A comparative summary of the environmental impacts associated with each alternative is provided in Table 5-3. As shown, Alternative 1 (the No Project alternative) would be the environmentally superior alternative, as it would result in no new environmental impacts and would eliminate the potentially significant impacts related to cultural resources, geology and soils, noise, and transportation/traffic. The remaining alternative, Alternative 2, would reduce the overall construction footprint of the project, since parking would no longer be constructed under the western portion of Hollywood Park. As such, construction effects related to noise and localized air quality emissions would be improved relative to the proposed project. Although Alternative 2 would increase the amount of export that would be generated during construction, these activities would not substantially increase the severity of any impacts or create any new significant impacts relative to the proposed project. For these reasons, Alternative 2 would be the environmentally superior alternative.

Table 5-3
Comparison of Impacts

Impact Area	Proposed Project	Alternative 1	Alternative 2
Aesthetics	LTS	NI	LTS
Air Quality	LTS	NI	LTS
Cultural Resources	LTSM	NI	LTSM
Geology and Soils	LTSM	NI	LTSM
Greenhouse Gas Emissions	LTS	NI	LTS
Hazards and Hazardous Materials	LTS	NI	LTS

Table 5-3
Comparison of Impacts

Impact Area	Proposed Project	Alternative 1	Alternative 2
Hydrology and Water Quality	LTS	NI	LTS
Land Use and Planning	LTS	NI	LTS
Noise	LTSM	NI	LTSM
Public Services	LTS	NI	LTS
Transportation and Traffic	LTSM	NI	LTSM
Utilities and Service Systems	LTS	NI	LTS
Energy Consumption	LTS	LTS	LTS

5.4 REFERENCES

City of West Hollywood. 2014. *West Hollywood Design District Streetscape Master Plan*, Final. Adopted December 15, 2014.