6.0 ALTERNATIVES

The *CEQA Guidelines* require that EIRs identify and evaluate a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the proposed project, while still satisfying most of the basic project objectives. The *CEQA Guidelines* also set forth the intent and extent of alternatives analysis to be provided in an EIR.

The following discussion evaluates alternatives to the proposed project and examines the potential environmental impacts associated with each alternative. Through comparison of these alternatives to the proposed project, the relative environmental advantages and disadvantages of each are weighed and analyzed. The *CEQA Guidelines* require that the range of alternatives addressed in an EIR should be governed by a rule of reason. Not every conceivable alternative must be addressed, nor do infeasible alternatives need to be considered (*CEQA Guidelines* Section 15126.6[a]). Section 15126.6 of the *CEQA Guidelines* states that 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 or other plans or regulatory limitations, and jurisdictional boundaries. Section 15126.6(b) of the *CEQA Guidelines* states that the discussion of alternatives must focus on alternatives capable of either avoiding or substantially lessening any significant environmental effects of the project, even if the alternative would impede, to some degree, the attainment of the project objectives or would be more costly. The alternatives discussion should not consider alternatives whose implementation is remote or speculative, and the analysis of alternatives need not be presented in the same level of detail as the assessment of the proposed project.

Based on the *CEQA Guidelines*, several factors need to be considered in determining the range of alternatives to be analyzed in the EIR and the level of analytical detail that should be provided for each alternative. These factors include: (1) the nature of the significant impacts of the proposed project, (2) the ability of alternatives to avoid or lessen the significant impacts associated with the proposed project, (3) the ability of the alternatives to meet the objectives of the proposed project, and (4) the feasibility of the alternatives. The analysis in this EIR shows that the proposed project would result in significant and unavoidable impacts with respect to construction noise and will have significant and unavoidable impacts on one roadway segment. All other impacts of the project can either be mitigated to a level of less than significant or are less than significant. The alternatives examined herein represent alternatives that could potentially reduce or avoid the significant and less than significant impacts associated with implementation of the proposed project.

As required by Section 15126.6 of the *CEQA Guidelines*, this section of the EIR examines a range of reasonable alternatives to the proposed project. The following alternatives are evaluated in this EIR:

- *Alternative 1: No Project*
- *Alternative 2: Existing Zoning (No Affordable Housing or Mixed Use Bonus)*
- *Alternative 3: Reduced Density (No Affordable Housing Bonus)*
- *Alternative 4: Boutique Hotel*
- *Alternative 5: No Subterranean Parking*

- *Alternative 6: Reduced Density on R4B Lots (No Affordable Housing Bonus on R4B Lots)*
- *Alternative 7: Modified Project*

This section also includes a discussion of the "environmentally superior alternative" among the alternatives analyzed.

Table 6-1 provides a summary comparison of the development characteristics of the proposed project and the alternatives. A more detailed description of the alternatives is included in the impact analysis for each alternative.

As indicated above, project alternatives should feasibly be able to attain "most of the basic objectives of the project" (Section 15126.6[a] of the *CEQA Guidelines*), even though implementation of the project alternatives might, to some degree, impede the attainment of those objectives or be more costly (Section 15126.6[b] of the *CEQA Guidelines*). The following are the project objectives as described in Section 2.0, *Project Description*.

1) *Provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing core of nearby community facilities, employment centers, retail goods and services, and restaurants to enhance the area's overall urban character.*
2) *To provide rental housing to satisfy the varying needs and desires of all economic segments of the community, including low and moderate-income households, maximizing the opportunity for individual choices, and contributing to the City of West Hollywood's housing stock.*
3) *Develop the site in accordance with the City of West Hollywood policies and designations while furthering the goals and objectives of the General Plan.*
4) *Create a consistent pattern of development and uses along Santa Monica Boulevard that serve project residents and the surrounding community by redeveloping an underutilized site.*
5) *Create a financially viable, modern, high-quality, multi-use development that offers unique living experiences while promoting an active pedestrian environment and access to restaurant and retail uses in the area.*
6) *Enhance pedestrian activity along Santa Monica Boulevard by providing street-level, street-facing retail and restaurant uses along Santa Monica Boulevard.*
7) *Provide housing and retail near alternative means of transportation, and provide sufficient on-site parking for the Project.*
8) *Develop multiple commercial and residential parcels to provide for an integrated urban design with integrated mobility.*
9) *Expand the economic base of the City, maintain economic vitality, and foster the City's fiscal health by, among other things, providing for commercial and retail activities which generate substantial sales and property tax revenue.*
10) *Promote the efficient use of water and energy through incorporation of water and energy conservation measures consistent with the City's Green Building Ordinance.*

Table 6-1
Comparison of Proposed Project Alternatives Characteristics

Characteristic	Alternatives							
	Proposed Project	**Alternative 1: No Project**	**Alternative 2: Existing Zoning**	**Alternative 3: Reduced Density**	**Alternative 4: Boutique Hotel**	**Alternative 5: No Subterranean Parking**	**Alternative 6: Reduced Density on R4B Lots**	**Alternative 7: Modified Project**
Restaurant/café floor area (sf)	2,820	0	1,054	2,820	14,820	2,820	4,948	2,810
Retail floor area (sf)	15,678	0	17,444	14,500	3,678	15,678	13,550	15,654
Office floor area (sf)	6,079	0	46,002	30,000	0	6,079	6,856	6,856
Hair salon floor area (sf)	3,718	0	0	0	0	3,718	3,643	3,643
Hotel floor area (sf)	0	0	0	0	78 rooms 42,900 sf	0	0	0
Live/work floor area (sf)	16,673	0	0	16,240	0	16,673	15,814	15,814
Residential floor area (sf)	90,819	0	16,800	37,882	16,800	90,819	86,276	90,596
Misc. (Lobby, storage, recreation, circulation, waste, electrical) (sf)	7,948	0	2,962	3,902	6,064	7,948	8,433	8,433
Total Floor Area (sf)	***143,735***	***0***	***84,262***	***105,344***	***84,262***	***143,735***	***139,520***	***143,806***
Floor to Area Ratio (FAR)	2.8	0	1.6	2.1	1.6	2.8	2.8	2.8
# Residential Units	97	0	14	34	14	97	95	97
# Affordable Housing Units (subset of total # of residential units)	*15*	*0*	*0*	*0*	*0*	*15*	*12*	*15*
# Live Work Units	12	0	0	10	0	12	15	15
# Required Parking (spaces)	337	0	264	313	259	337	349	335
Maximum height	55 feet	N/A	CC1: 35 feet R4B: 45 feet	45 feet	CC1: 35 feet R4B: 45 feet	65 feet	CC1: 55 feet R4B: 45 feet	55 feet

6.1 ALTERNATIVES CONSIDERED BUT REJECTED AS INFEASIBLE

The City considered alternative sites for the project pursuant to *CEQA Guidelines* section 15126.6, which states an agency shall consider a reasonable range of alternatives to the project or to the location of the project. However, alternative sites for the project were considered but determined to be infeasible for several reasons: (a) the project applicant does not own other parcels in the City that could accommodate this project, and *CEQA Guidelines* section 15126.6(f)(1) only requires consideration of alternative sites if the project applicant can reasonably acquire or gain access alternative locations; (b) the project is ideal for parcels located in the City's mixed-use overlay; (c) to achieve Objectives # 3, 4, 6, and 7, the project must be located on Santa Monica Boulevard and near existing alternative means of transportation; (d) other sites along Santa Monica Boulevard would not easily accommodate a mixed-use project of this size. Further, given the City's current level of urban development, an alternative site location would not likely avoid or substantially lessen any of the significant impacts of the Project (noise and impacts on one roadway segment).

6.2 NO PROJECT ALTERNATIVE

6.2.1 Alternative Description

This alternative assumes that the proposed project is not implemented and the project site remains in its current condition.

6.2.2 Impact Analysis

The No Project Alternative would involve no changes to the physical environment and thus would have no environmental effects. As such, this alternative would have generally reduced impacts with respect to air quality, aesthetics, greenhouse gas (GHG) emissions, hydrology and geology, traffic, and noise. Construction impacts associated with the proposed project would be avoided because no development would occur on the project site. The existing structures would not be demolished. The No Project Alternative would eliminate the proposed project's significant and unavoidable impacts related to construction noise and the increases in traffic at one study area intersection. No mitigation measures would be required for the No Project Alternative. Overall impacts would be lower than those of the proposed project since no change to environmental conditions would occur.

However, the No Project Alternative would not meet any of the objectives of the proposed project. This alternative would not: provide additional housing opportunities (Objective 1), would not provide rental housing including low-income housing (Objective 2), would not further the goals of the General Plan (Objective 3), would not redevelop an underutilized site (Objective 4), would not create a multi-use development (Objective 5), would not enhance pedestrian activity on Santa Monica Boulevard (Objective 6), would not provide an integrated urban design (Objective 7), would not provide housing near alternative transportation (Objective 8), would not expand the City's economic base (Objective 9), nor promote the efficient use of water or other energy conservation measures consistent with the City's Green

Building Ordinance (Objective 10). Further, this alternative would not preclude future redevelopment of the project site.

6.3 ALTERNATIVE 2: EXISTING ZONING

6.3.1 Alternative Description

This alternative would involve development consistent with the existing zoning for the project site without the affordable housing or mixed-use bonus. Currently, most of the project site is zoned/designated Commercial, Community 1 (CC1). A 12,974-square foot area in the north of the project site is zoned/designated Residential, Multi-Family High Density (R4B) (see figures 2-4 and 2-5 in Section 2.0, *Project Description*). This alternative would involve separate developments on the CC1 and R4B portions of the project site. Table 6-2 provides a summary comparison of Alternative 2 to the proposed project.

Table 6-2
Alternative 2 Characteristics

		Alternative 2	
	Proposed Project	**CC1 Lot**	**R4B Lot**
Building Floor Area	Commercial Restaurant/Café: 2,820 sf Retail: 15,678 sf Office: 6,079 sf Hair Salon: 3,718 sf Live/work space: 16,673 sf *Subtotal: 44,968 sf* Residential: Apartments: 90,819 sf Residential Lobby: 639 sf Residential Recreation Room: 610 sf Residential Storage: 2,876 sf *Subtotal: 94,944 sf* Circulation, waste, electrical: 3,823 sf **Total Floor Area: 143,735 sf**	Commercial Restaurant: 1,054 sf Retail: 17,444 sf Office: 46,002 sf Hair Salon: none Live/work space: none *Subtotal: 64,500 sf* Residential None Circulation, waste, electrical: 2,962 sf **Total Floor Area: 67,462 sf**	14 units
Unit Summary	Apartment Units: 97 units Live/Work Units: 12 units	Apartment Units: None Live/Work Units: None	Apartment Units: 14
Affordable Housing	15 units	0 units	0 units
Height	55 feet	35 feet	45 feet
Floor Area Ratio (FAR)	2.8 (CC1 portion only)	1.6 *(1.5 FAR Allowed + 0.1 FAR Green Building Incentive Bonus)*	N/A
Parking	337 spaces	236 spaces	28 spaces

Based on maximum build out of the existing zoning classifications, Alternative 2 would include approximately 64,500 square feet of commercial space (1.6 FAR) on the CC1 portion of the project site. The commercial uses would include 17,444 square feet of retail, 1,054 square feet of restaurant space, and 46,002 square feet of office uses in a 35-foot high building. On the R4B portion of the project site, Alternative 2 would involve 14 two-bedroom units in a 45-foot high building. The commercial and residential components of this alternative would consist of separate developments. This alternative would provide 236 parking spaces for parking requirements for uses in the commercial lots and 28 parking spaces for the residential lots (in accordance with the City's Municipal Code [WHMC] parking requirements). On the commercial component, parking would be provided similarly to the proposed project, with one level of an enclosed subterranean parking garage and parking on the first floor and mezzanine level. Although this alternative would not include a mixed-use or affordable housing bonus, it would include water and energy conservation measures in order to achieve the green building incentive bonus.

6.3.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing onsite structures and construction of commercial and residential uses. Ozone precursors NO_X and VOC, as well as carbon monoxide (CO), would be still emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. Similar to the proposed project, standard emission control measures required by the SCAQMD and the City of West Hollywood would still apply. As shown in Table 6-3, maximum daily VOC and CO emissions during construction would be slightly lower than those of the proposed project. NO_X emissions would be slightly higher but would be below SCAQMD thresholds and LSTs. Impacts would be less than significant, similar to the proposed project.

Operational emissions associated with Alternative 2 are shown in Table 6-4. This alternative would have slightly lower operational emission for all pollutants compared to the proposed project. As with the proposed project, impacts would be less than significant.

Alternative 2 would generate approximately 419 net Average Daily Trips (ADT), which would be 48% fewer vehicle trips than the proposed project would generate (809 ADT). Therefore, the reduction of vehicle trips associated with this alternative would result in lower CO levels at intersection hotspots. As with the proposed project, CO impacts to would be less than significant.

Table 6-3
Alternative 2 Construction Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Alternative 2 Maximum Daily Construction Emissions	19.78	39.13	29.75	4.93	2.74	0.07
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Alternative 2 Maximum Daily On-Site Construction Emissions	19.72	26.59	20.87	2.24	1.14	0.02
Local Significant Threshold [2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**	**n/a**
Proposed Project Maximum Daily Construction Emissions for Comparison	25.4	26.59	20.87	3.31	2.12	0.02

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod calculations Alternative 2, see Appendix C.
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Architectural coating phase assumed to last 60 days and comply with SCAQMD Rule 1113.
[2] LSTs are for a one-acre project in SRA-2 within a distance of 82 feet from the site boundary.

Table 6-4
Alternative 2 Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	4.79	0.02	1.20	0.02	0.02	<0.01
Energy	0.03	0.23	0.19	0.02	0.02	<0.01
Mobile	4.58	11.24	45.0	7.89	2.24	0.11
Subtotal	*9.39*	*11.49*	*46.39*	*8.02*	*2.28*	*0.12*
Existing Emissions to be Removed[1]	*(6.21)*	*(9.92)*	*(42.77)*	*(5.51)*	*(1.41)*	*(0.08)*
Net Emissions Increase - Alternative 2	**3.18**	**1.57**	**3.62**	**2.51**	**0.87**	**0.04**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Proposed Project Operational Emissions for Comparison	6.72	5.24	25.12	4.72	1.61	0.07
Maximum Daily On-Site Operational Emissions (area emissions only)[1]	**4.79**	**0.02**	**1.20**	**0.02**	**0.02**	**<0.01**
Local Significant Threshold [2] (on-site only)	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***

Source: Table 2.2, Overall Operational, CalEEMod calculations for Alternative 2, see Appendix C
( ) indicates subtraction, Numbers may not add due to rounding.
[1] See Table 4.2-6 in Section 4.2, Air Quality.
[1] On-site emissions include area emissions consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[2] LSTs are for a one acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary.

b. Geology and Hydrology. Although this alternative would reduce the overall building size compared to the proposed project, it would be subject to the same potential geological impacts as the proposed project. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same as those of the proposed project. Like the proposed project, this alternative may also require dewatering during construction that could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. Mitigation measures GEO-1, GEO-2, GEO-3(a) and GEO-3(b) required for the proposed project would also apply to this alternative and, similar to the proposed project, would reduce impacts to a less than significant level.

c. Greenhouse Gases. Table 6-5 shows GHG emissions associated with Alternative 2. As shown, Alternative 2 would result in fewer GHG emissions (1,032 metric tons CO_2E compared to 1,352 metric tons CO_2E) than the proposed project due to the reduced number of vehicle trips, reduced energy demand for natural gas and electricity, and fewer emissions related to construction activities. Alternative 2 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375 and the City of West Hollywood Climate Action Plan. Therefore, impacts would remain less than significant and would be reduced in comparison to the proposed project.

Table 6-5
Alternative 2 Annual Greenhouse Gases Emissions

Emission Source	**Annual Emissions (Metric Tons CO_2E)**
Alternative 2 Construction	27
Alternative 2 Operational	
Area	1
Energy	545
Solid Waste	36
Water	74
Alternative 2 Mobile	
CO_2 and CH_4	1,301
N2O	69
Alternative 2 Subtotal	2,053
Existing Conditions[1]	*(1,317)*
Net Emissions Increase from Alternative 2 (Alternative 2 - Existing)	**1,032 metric tons CO_2E**
Total Emissions from Proposed Project for Comparison	*1,352 metric tons CO_2E*

Source: Tables 2.1, 2.2, and 4.2 in CalEEMod annual worksheets for Alternative 2 in Appendix C
() denotes subtraction
1 See Table 4.3-2 in Section 4.3, Greenhouse Gas Emissions

d. Land Use and Planning. This alternative would involve development consistent with the existing zoning for the project site. Based on maximum build out of the existing zoning classifications, Alternative 2 would include approximately 64,500 sf of commercial space (1.6 FAR) in a 35-foot high building on the CC1 portion of the project site. On the R4B portion of the project site, Alternative 2 would involve 14 two-bedroom units in a 45–foot building.

Alternative 2's consistency with the applicable requirements of the Zoning Ordinance and General Plan are shown in Table 6-6. While this alternative would be consistent with the City's Zoning Ordinance with respect to FAR, density and building height, this alternative would not meet several provisions of the City of West Hollywood 2035 General Plan to develop a mixed-use project on the site and to provide affordable housing. For projects with 10 or more apartment units, developers that do not provide housing are required to pay the Affordable Housing In-Lieu Fee to support affordable housing development elsewhere in the City. With fee payment, this alternative would support affordable housing in the City although it would not actually contribute to the City's affordable housing stock. According to the CEQA Guidelines Appendix G, a significant impact may occur if a project conflicts with an applicable land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect. The WHMC and General Plan goals and policies to encourage mixed-use development on the site and provide affordable housing relate to the City's vision for the land use pattern of the area and the provision of housing for residents of all socioeconomic statuses and do not specifically avoid or mitigate an environmental effect. Therefore, although this alternative may be inconsistent with some goals of the General Plan related to mixed-use projects and affordable housing, like the proposed project, it would not conflict with any General Plan land use policies or goals adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, land use impacts for this alternative would be the same as the proposed project and would be less than significant.

Table 6-6
Alternative 2 Consistency with Zoning Ordinance

Requirement	Allowed	Proposed Project	Alternative 2
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 + 35% Density Bonus for Affordable Housing: 0.70 +Green Building Bonus FAR: 0.1 *Total Allowed = 2.8*	**Consistent** CC1: 2.8	**Consistent** 1.6
Density[2]	14 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 5 units as 35% bonus for affordable units *Total Allowed = 19 units*	**Consistent** 19 units	**Consistent** 14 units
Building Height	CC1 Allowed Height: 35 ft + Mixed-Use Bonus Height: 10 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 feet* R4B Allowed Height: 45 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*	**Consistent** CC1: 55 ft R4B: 55 ft	**Consistent** CC1: 35 ft R4B: 45 ft

[1] *FAR used in commercial zoning only*
[2] *Density used in residential zoning only*

a. Noise. Construction-related noise and vibration impacts would be similar to those of the proposed project because construction of this alternative would require the same types of construction equipment. The duration of construction activities would be similar to, but slightly reduced in comparison to that of the proposed project because the scale of development and

length of construction would be reduced. Nonetheless, as with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation Measure N-1a through N-1d would still be required.

Alternative 2 would generate approximately 419 net ADT, or about 48% fewer vehicle trips than would be generated by the proposed project (809 ADT). Therefore, the decrease in vehicle trips associated with this alternative would result in incrementally lower noise levels on study area roadways. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant.

Alternative 2 would include 14 residential units on the portion of the project site zoned R4B that has frontage to West Knoll Drive (the same number of the units on the R4B lot associated with proposed project). As discussed in Section 4.5, *Noise*, existing noise on West Knoll Drive was measured at 58.9 dBA Leq and modeled at 57.3 dBA Leq. Future residences on the project site would not be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. Impacts would be the same as the proposed project and would be less than significant.

Operation of Alternative 2 would result in noise from onsite sources such as stationary equipment, rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with restaurant, office, and retail activities. Noise levels would be similar to those of the proposed project and would be less than significant.

b. Transportation and Circulation. As with the proposed project, construction activities and associated truck trips and worker trips could temporarily interrupt the local roadway system. The overall duration of construction activities and associated traffic interruptions would be similar to those of the proposed project. However, as with the proposed project, compliance with City of West Hollywood requirements for construction management would reduce construction-related impacts to a less than significant level.

As discussed in Section 4.6, *Transportation and Circulation*, the proposed project would generate an estimated 809 new ADT, including 51 AM peak hour, 89 midday peak hour, and 66 PM peak hour trips along study area roadway segments. Alternative 2 would generate approximately 419 ADT, including 45 AM peak hour, 86 midday peak hour, and 51 PM peak hour trips. This would be 390 (48%) fewer daily vehicle trips than the proposed project. Therefore, no new impacts would occur as a result of this alternative. However, the unavoidably significant impact at the intersection of Hancock Avenue and Holloway Drive under future (2019) conditions in the PM peak hour is anticipated to remain under this alternative.

Impacts to bicycle facilities, pedestrian facilities, public transportation and the arterial monitoring stations and freeway segments in the CMP network would be less than significant, similar to the proposed project.

c. Utilities and Service Systems. As shown in Table 6-7, Alternative 2 would generate an estimated 13,438 gallons of wastewater per day. Compared to the proposed project, this represents a decrease of 9,982 gallons per day, a 43% reduction. Impacts related to wastewater

infrastructure and treatment would therefore be reduced under Alternative 2 compared to the proposed project, and would remain less than significant.

Table 6-7
Alternative 2 Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)[1]	Amount (gpd)
Residential Apt 2 BD	14 units	160 gallons/unit	2,240
Auto Parking	85,091 sf [2]	20 gallons/1,000 sf	1,702
Restaurant (Indoor Seating)	40 seats [3]	30 gallons/seat	1,200
Office	46,002 sf	150 gallons/1,000 sf	6,900
Retail	17,444 sf	80 gallons/1,000 sf	1,396
Alternative 2 Wastewater Generation			**13,438**
Proposed Project Wastewater Generation for Comparison			***23,420***

[1] Rates from VCA Engineers, Inc. (2017) based on land use table from the LA County Sanitation District No 4.
[2] Alternative 2 has a 22% decrease in parking (264 compared to 337) compared to proposed project, therefore 22% decrease in parking square footage compared to proposed project (85,091 compared to 109,091)
[3] Alternative 2 has a 63% reduction in restaurant square footage (2,830 compared to 1,054) compared to proposed project. Therefore, a 63% reduction in restaurant seating assumed (106 seats compared to 40)
Notes: sf = square feet, gpd = gallons per day, bd= bedroom

d. Consistency with Project Objectives and Feasibility. This alternative would meet some of the objectives of the proposed project, but would not meet other objectives or would achieve those objectives to a lesser degree as compared to the proposed project (Objectives 1, 2, 3, 4, 5, 7, and 8). This alternative would not achieve several of the 2035 General Plan policies to promote the production of housing in the City. The City recognizes that the WHMC and 2035 General Plan include mixed-use and affordable housing bonuses to encourage the development of residential uses, and such incentives are needed to enhance the City's housing stock. This alternative would not sufficiently utilize the project site to promote the City's policies to increase market-rate and affordable residential units available in the City. This alternative would also not be feasible, as it would not provide affordable residential units pursuant to the City and state's SB 1818 requirements, although it would be required to pay an in-lieu fee to support affordable housing development in the City (See CEQA Guidelines section 15364). The Project applicant proposes an affordable housing project consistent with the WHMC and 2035 General Plan and consistent with the state's affordable housing requirements of SB 1818. This alternative would also not maximize the development potential of the project site by not integrating the two neighboring residential and commercial parcels to create a more integrated and cohesive project. This alternative would also not fully enhance the area's overall economic character, as it would not expand the City's economic base to the same degree as the proposed Project. Traffic impacts under this alternative would decrease as compared to the proposed project, but impacts would remain significant and unavoidable at the intersection of Hancock Avenue and Holloway Drive. Further, although the project site is in the mixed-use overlay zone, this alternative does not provide for mixed-use on the commercial parcels. This alternative would also not avoid or substantially decrease the project's significant impacts. The following is a discussion of this alternative compared to each objective.

1) *Inconsistent: This alternative would not contribute to the residential development of mixed-use areas as residential uses would not be included in the commercial portion of the site.*
2) *Partially Consistent: Alternative 2 would not develop affordable housing units and would provide 83 fewer rental housing opportunities.*
3) *Inconsistent: This alternative would not be consistent with several of the City policies and designations because it would not provide a mixed-use development in the mixed-use incentive overlay zone (the project would involve commercial only on the commercially-zoned portion of the site and residential on the residential portion; the separate residential and commercial developments would not be considered a mixed-use project); would not satisfy the policies of the City's housing element, including policies related to affordable housing; and would not achieve the purpose of the transit overlay zone.*
4) *Partially Consistent: This alternative would involve redeveloping an underutilized site and would continue a pattern of commercial development, but would not maximize the redevelopment potential of the site or fully enhance the area's urban character.*
5) *Inconsistent: This alternative would not provide any residential units in the commercial portion of the site, and would therefore not create a unique, multi-use living experience.*
6) *Consistent: Alternative 2 would enhance pedestrian activity by providing street-level, street-facing retail and restaurant uses along Santa Monica Boulevard.*
7) *Partially Consistent: Alternative 2 would provide sufficient on-site parking near alternative means of transportation, but would not provide any affordable residential units and fewer residential units as compared to the proposed project.*
8) *Inconsistent: Alternative 2 would not provide for an integrated urban design or integrated mobility.*
9) *Consistent: Alternative 2 would provide commercial and retail activities.*
10) *Consistent: This alternative would include water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.4 ALTERNATIVE 3: REDUCED DENSITY

6.4.1 Alternative Description

This alternative would involve development of a mixed-use project on the commercial and R4B residential parcels, but at a reduced density as compared to the proposed project. This alternative would not involve density bonuses allowed by the City's affordable housing ordinance and SB 1818. Alternative 3 would provide commercial and residential uses on the commercial lot to total 2.1 FAR, including 1.6 FAR for commercial uses and 0.5 FAR for residential units. The commercial development would include 2,820 sf of restaurant uses, 14,500 sf of retail uses, 30,000 sf of office uses, 10 Live/Work units, and 20 residential units (two-bedroom units totaling 21,082 sf). Development on the residential R4B parcels would include 14 residential units, with no affordable units. This alternative would use the mixed-use density bonus, but would not incorporate the affordable housing density bonus. This alternative would include water and energy conservation measures in order to achieve the green building incentive bonus.

The building would be a 45-foot high building (base height of 35 feet plus the 10 foot mixed-use incentive overlay zone bonus). On the R4B portion of the project site, Alternative 3 would involve 14 two-bedroom units in a 45-foot building. This alternative would provide 245 parking spaces for the commercial uses and 68 parking spaces for the residential uses. On the commercial lot, parking would be provided in an enclosed subterranean parking garage and on levels 1 and 1.5 similar to the proposed project. Table 6-8 compares this alternative to the proposed project.

Table 6-8
Alternative 3 Characteristics

		Alternative 3	
	Proposed Project	**CC1 Lot**	**R4B Lot**
Building Floor Area	Commercial Restaurant/Café: 2,820 sf Retail: 15,678 sf Office: 6,079 sf Hair Salon: 3,718 sf Live/work space: 16,673 sf *Subtotal: 44,968 sf* Residential: Apartments: 90,819 sf Residential Lobby: 639 sf Residential Recreation Room: 610 sf Residential Storage: 2,876 sf *Subtotal: 94,944 sf* Circulation, waste, electrical: 3,823 sf **Total Floor Area: 143,735 sf**	Commercial Restaurant/ Café: 2,820 sf Retail: 14,500sf Office: 30,000sf Live/work space: 16,240 sf *Subtotal: 63,560 sf* Residential: Apartments: 21,082 sf Circulation, Waste, Electrical: 3,902 **Total Floor Area: 88,544 sf**	14 units
Unit Summary	Apartment Units: 97 units Live/Work Units: 12 units	Apartment Units: 20 units Live/Work Units:10 units	Apartment Units: 14
Affordable Housing	15 units	0 units	0 units
Height	55 feet	45 feet *(Base height allowed of 35 feet, Mixed-Use Incentive Overlay Zone Bonus of additional 10 feet in height)*	45 feet
Floor Area Ratio (FAR)	2.8 (CC1 portion only)	2.1 *(1.5 FAR Allowed + 0.5 FAR Mixed Use Bonus + 0.1 FAR Green Building Incentive Bonus)*	N/A
Parking	337 spaces	285 spaces	28 spaces

6.4.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing onsite structures and construction of commercial and residential uses. Ozone precursors NOX and VOC, as well as CO, would be still emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM10)

would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. As shown in Table 6-9, maximum daily air pollution emissions during construction would be slightly lower than those of the proposed project. Impacts would be less than significant, similar to the proposed project. Similar to the proposed project, standard emission control measures required by the SCAQMD and City of West Hollywood would apply.

Table 6-9
Alternative 3 Construction Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Alternative 3 Maximum Daily Construction Emissions	21.21	39.13	29.75	4.93	2.74	0.07
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Alternative 3 Maximum Daily On-Site Construction Emissions	21.14	26.59	20.87	3.31	2.12	0.02
Local Significant Threshold [2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**	**n/a**
Proposed Project Maximum Daily Construction Emissions for Comparison	25.6	39.1	29.8	7.7	4.1	0.07

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod calculations Alternative 3, see Appendix C
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Construction emissions assumed to comply with Mitigation Measures 3.2-1 and 3.2-2 of the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, which apply to all development in the city. Architectural coating phase assumed to last 60 days and comply with SCAQMD Rule 1113.
[2] LSTs are for a one acre project in SRA-2 within a distance of 82 feet from the site boundary.

Operational emissions associated with Alternative 3 are shown in Table 6-10. This alternative would have slightly lower operational emission for all pollutants compared to the proposed project. As with the proposed project, impacts would be less than significant.

Alternative 3 would generate approximately 529 net ADT, which would be 35% fewer vehicle trips than the proposed project (809 ADT). Therefore, the reduction of vehicle trips associated with this alternative would result in lower CO levels at intersection hotspots. As with the proposed project, CO impacts to would be less than significant.

Table 6-10
Alternative 3 Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	5.34	0.03	2.86	0.05	0.05	<0.01
Energy	0.04	0.33	0.25	0.03	0.03	<0.01
Mobile	4.85	11.53	46.66	8.09	2.28	0.12
Subtotal	*10.23*	*11.89*	*49.77*	*8.17*	*2.36*	*0.12*
Existing Emissions to be Removed[1]	*(6.21)*	*(9.92)*	*(42.77)*	*(5.51)*	*(1.41)*	*(0.08)*
Net Emissions Increase - Alternative 3	**4.02**	**1.97**	**7.0**	**2.66**	**0.95**	**0.04**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Proposed Project Operational Emissions for Comparison[1]	6.72	5.24	25.12	4.72	1.61	0.07
Maximum Daily On-Site Operational Emissions (area emissions only)[2]	5.34	0.03	2.86	0.05	0.05	<0.01
Local Significant Threshold [3] (on-site only)	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***

Source: Table 2.2, Overall Operational, Mitigated, CalEEMod calculations for Alternative 3, see Appendix C
( ) indicates subtraction, Numbers may not add due to rounding.
[1] See Table 4.1-6 in Section 4.1, Air Quality
[2] On-site emissions include area emissions (consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[3] LSTs are for a one acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary.

b. Geology and Hydrology. Although this alternative would reduce the overall building size compared to the proposed project, it would be subject to the same potential geological impacts as the proposed project. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same as those of the proposed project. Like the proposed project, this alternative may also require dewatering during construction that could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. Mitigation measures GEO-1, GEO-2, GEO-3(a) and GEO-3(b) required for the proposed project would also apply to this alternative and, similar to the proposed project, would reduce impacts to a less than significant level.

c. Greenhouse Gases. Table 6-11 shows GHG emissions associated with Alternative 3. As shown, Alternative 3 would result in fewer GHG emissions (806 metric tons CO_2E compared to 1,352 metric tons CO_2E) than the proposed project due to the reduced number of vehicle trips and reduced energy demand for natural gas and electricity. Alternative 3 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375 and the City of West Hollywood Climate Action Plan. Impacts would be similar to the proposed project and would remain less than significant.

Table 6-11
Alternative 3 Annual Greenhouse Gases Emissions

Emission Source	Annual Emissions (Metric Tons CO_2E)
Alternative 3	
Project Construction	28
Project Operational	
Area	1
Energy	565
Solid Waste	42
Water	64
Project Mobile	
CO_2 and CH_4	1,351
N_2O	72
Project Subtotal	**2,123**
Existing Conditions[1]	**(1,317)**
Net Emissions Increase from Alternative 3 (Alternative 3 - Existing)	**806 metric tons CO_2E**
Total Emissions from Proposed Project for Comparison	1,352 metric tons CO_2E

Source: Tables 2.1, 2.2 and 4.2 in CalEEMod annual worksheets for Alternative 3, see Appendix C for calculations and for GHG emission factor assumptions.
( ) denotes subtraction
[1] *See Table 4.4-2 in Section 4.3, Greenhouse Gas Emissions*

d. Land Use and Planning. This alternative would involve development consistent with the existing zoning for the project site and with the mixed-use incentive overlay zone and green building bonus. However, this alternative would not involve density bonuses allowed by the City's affordable housing ordinance and SB 1818. Alternative 3's consistency with the City's applicable requirements for FAR, density and building height are shown in Table 6-12. As shown, this alternative would be consistent with the FAR, density and building height requirements of the WHMC, but would not meet some of the provisions of the City of West Hollywood 2035 General Plan to provide affordable housing. However, developers that do not provide housing are required to pay the Affordable Housing In-Lieu Fee to support affordable housing development elsewhere in the City. With fee payment, this alternative would support affordable housing in the City although it would not directly contribute to the City's affordable housing stock. This alternative would not conflict with any General Plan land use policies or goals adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be the same as the proposed project and would be less than significant.

Table 6-12
Alternative 3 Consistency with Zoning Ordinance

Requirement	Allowed	Proposed Project	Alternative 3
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 + 35% Density Bonus for Affordable Housing: 0.70 +Green Building Bonus FAR: 0.1 *Total Allowed = 2.8*	**Consistent** CC1: 2.8	**Consistent** 2.1
Density[2]	14 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 5 units as 35% bonus for affordable units *Total Allowed = 19 units*	**Consistent** 19 units	**Consistent** 14 units
Building Height	CC1 Allowed Height: 35 ft + Mixed-Use Bonus Height: 10 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*, R4B Allowed Height: 45 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*	**Consistent** CC1: 55 ft R4B: 55 ft	**Consistent** CC1: 45 ft R4B: 45 ft

[1] *FAR used in commercial zoning only*
[2] *Density used in residential zoning only*

e. Noise. Construction-related noise and vibration impacts would be similar to the proposed project because construction of this alternative would require the same types of construction equipment. The duration of construction activities would be similar to, but slightly reduced as compared to that of the proposed project because the scale of development and length of construction would be reduced. As with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation measures N-1a through 1d would still be required.

Alternative 3 would generate approximately 529 net ADT, or about 35% fewer vehicle trips than would be generated by the proposed project (809 ADT). Therefore, the reduction in vehicle trips associated with this alternative would result in incrementally lower noise levels on study area roadways. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant.

Alternative 3 would include 10 live/work units and 34 apartment units. As discussed in Section 4.5, *Noise*, existing noise on Santa Monica Boulevard was measured at 70.5 dBA Leq and modeled at 71.5 dBA Leq. As a result, future residences on the project site may be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. However, with compliance with California Building Code noise insulation requirements, future residents would not be exposed to noise levels above City standards. As with the proposed project, impacts would be less than significant.

Operation of Alternative 3 would result in noise from onsite sources such as stationary equipment, rooftop ventilation and heating systems, trash hauling, conversations and other

noises associated with restaurant, office, and retail activities. Noise levels would be similar to those of the proposed project and would be less than significant.

f. Transportation and Circulation. As with the proposed project, construction activities and associated truck trips and worker trips could temporarily interrupt the local roadway system. The overall duration of construction activities and associated traffic interruptions would be similar those of the proposed project. However, as with the proposed project, compliance with City of West Hollywood requirements would reduce construction-related impacts to a less than significant level.

As discussed in Section 4.6, *Transportation and Circulation*, the proposed project would generate an estimated 809 new ADT, including 51 AM peak hour, 89 midday peak hour, and 66 PM peak hour trips along study area roadway segments. Alternative 3 would generate approximately 529 ADT, including 51 AM peak hour, 80 midday peak hour, and 54 PM peak hour trips. This would be 280 (35%) fewer daily vehicle trips than would be generated by the proposed project. Therefore, impacts would decrease in comparison to the proposed project. However, the unavoidably significant impact at the intersection of Hancock Avenue and Holloway Drive under future (2019) conditions in the PM peak hour is anticipated to remain under this alternative.

Impacts to bicycle facilities, pedestrian facilities, public transportation and the arterial monitoring stations and freeway segments in the CMP network would be less than significant, similar to the proposed project.

g. Utilities and Service Systems. As shown in Table 6-13, Alternative 3 would generate an estimated 17,509 gallons of wastewater per day. Compared to the proposed project, this represents a decrease of 5,911 gallons per day, a 25% reduction. Impacts related to wastewater infrastructure and treatment would therefore be reduced under Alternative 3 compared to the proposed project, and would remain less than significant.

Table 6-13
Estimated Alternative 3 Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)[1]	Amount (gpd)
Residential Apt 2 BD	34 units	160 gallons/unit	5,440
Residential Live/Work	10 units	120 gallons/unit	1,200
Auto Parking	101,455 sf [2]	20 gallons/1,000 sf	2,029
Restaurant (Indoor Seating)	106 seats	30 gallons/seat	3,180
Office	30,000 sf	150 gallons/1,000 sf	4,500
Retail	14,500 sf	80 gallons/1,000 sf	1,160
Alternative 3 Wastewater Generation			**17,509**
Proposed Project Wastewater Generation for Comparison			***23,420***

[1] Rates from VCA Engineers, Inc. (2017) based on land use table from the LA County Sanitation District No 4.
[2] Alternative 3 has a 7% reduction in parking (313 compared to 337) compared to proposed project, therefore 7% reduction in parking square footage compared to proposed project (101,455 compared to 109,091).
Notes: sf = square feet, gpd = gallons per day, bd= bedroom, cfs = cubic feet per second

h. Consistency with Project Objectives and Feasibility. This alternative would provide 63 fewer apartment units compared to the proposed project, and would meet some of the objectives of the proposed project. However, this alternative would not meet other objectives or would meet certain objectives to a lesser degree as compared to the proposed Project (Objectives 2, 3, 4, 5, 7, and 8). For example, fewer residential units would not achieve the project objective to provide a unique living experience. This alternative would also not achieve several of the 2035 General Plan policies to promote the production of housing in the City. The City recognizes that the WHMC and 2035 General Plan include mixed-use and affordable housing bonuses to encourage the development of residential uses, and such incentives are needed to enhance the City's housing stock. This alternative would not sufficiently utilize the project site to promote the City's policies to increase market-rate and affordable residential units available in the City. This alternative would also not be feasible, as it would not provide affordable residential units pursuant to the City and state's SB 1818 requirements, although it would be required to pay an in-lieu fee to support affordable housing development in the City (See CEQA Guidelines section 15364.). The project applicant proposes an affordable housing project consistent with the WHMC and 2035 General Plan and consistent with the state's affordable housing requirements of SB 1818. This alternative would also not fully enhance the area's overall economic character, as it would not expand the City's economic base to the same degree as the proposed project. This alternative would also not avoid or substantially decrease the project's significant impacts. This alternative would decrease traffic impacts but impacts would remain significant and unavoidable at the intersection of Hancock Avenue and Holloway Drive. The following is a discussion of this alternative compared to each objective.

This alternative would not meet other objectives or would meet certain objectives to a lesser degree as compared to the proposed Project (Objectives 2, 3, 4, 5, 7, and 8). The following is a discussion of this alternative compared to each project objective.

1) *Partially consistent: This alternative would provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing urban core. However, it would not provide as many residential units as the proposed project (34 units compared to 97).*
2) *Partially consistent: Alternative 3 would not develop affordable housing units and would provide 63 fewer rental housing opportunities.*
3) *Partially Consistent: The land uses for this alternative are consistent with the City's designations and this alternative provides a mixed-use development in the mixed-use incentive overlay zone. Yet with 63 fewer rental housing opportunities, it would not satisfy the policies of the City's housing element, including policies related to affordable housing, would not achieve the purpose of the transit overlay zone, nor would it serve to maximize housing on R4B lots.*
4) *Partially Consistent: This alternative would involve redeveloping an underutilized site and would continue a pattern of commercial development, but would not maximize the redevelopment potential of the site or fully enhance the area's urban character.*
5) *Partially Consistent: This alternative would create a multi-use development, but would not maximize the redevelopment potential of the site or fully enhance the area's urban character or provide a unique living experience given the fewer residential units.*
6) *Consistent: Alternative 3 would enhance pedestrian by providing street-level, street-facing retail and restaurant uses along Santa Monica Boulevard.*

7) *Partially Consistent: Alternative 3 would provide sufficient on-site parking and would provide housing and retail near alternative means of transportation, but would provide 63 fewer residential units compared to the proposed project.*
8) *Partially Consistent: Alternative 3 would provide for an integrated urban design and integrated mobility, but would provide 63 fewer residential units than the proposed project.*
9) *Consistent: Alternative 3 would provide commercial and retail activities.*
10) *Consistent: This alternative would include water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.5 ALTERNATIVE 4: BOUTIQUE HOTEL

6.5.1 Alternative Description

Alternative 4 would involve separate developments on the CC1 and R4B portions of the project site. This alternative would involve developing a boutique hotel with commercial uses on the ground level on the commercial parcels to total a 1.6 FAR on the CC1 portion of the project site. The hotel would provide 78 guest rooms. Ground floor commercial uses would include 14,820 square feet of restaurant/café space and 3,678 square feet of retail space. The hotel/commercial building be 35-feet in height and would not include a mixed-use bonus or any housing. This alternative would include water and energy conservation measures in order to achieve the green building incentive bonus. On the commercial lot, parking would be provided in an enclosed subterranean parking garage and on levels 1 and 1.5 similar to the proposed project.

On the R4B portion of the project site, Alternative 4 would involve 14 two-bedroom units in a 45-foot building with 28 parking spaces. Table 6-14 compares this alternative to the proposed project.

Table 6-14
Alternative 4 Characteristics

	Proposed Project	Alternative 4	
		CC1 Lot	R4B Lots
Building Floor Area	Commercial Restaurant/Café: 2,820 sf Retail: 15,678 sf Office: 6,079 sf Hair Salon: 3,718 sf Live/work space: 16,673 sf *Subtotal: 44,968 sf* Residential*:* Apartments: 90,819 sf Residential Lobby: 639 sf Residential Recreation Room: 610 sf Residential Storage:2,876 sf *Subtotal: 94,944 sf* Circulation, waste, electrical: 3,823 sf **Total Floor Area: 143,735 sf**	Commercial Restaurant/Café: 14,820 sf Retail: 3,678 sf Office: none Live/work space: none *Subtotal: 18,498 sf* Hotel: 42,900 sf (78 rooms) Residential: Apartments: none Circulation, Waste, Electrical 6,064 sf **Total Floor Area: 67,462 sf**	14 units
Unit Summary	Apartment Units: 97 units Live/Work Units: 12 units	Apartment Units: 0 units Live/Work Units: 0 units	Apartment Units: 14
Affordable Housing	15 units	0 units	0 units
Height	55 feet	35 feet	45 feet
Floor Area Ratio (FAR)	2.8 (commercial portion only)	1.6 *(1.5 FAR Allowed + 0.1 FAR Green Building Incentive Bonus)*	N/A
Parking	337 spaces	231 spaces	28 spaces

6.5.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing onsite structures and construction of commercial and residential uses. Ozone precursors NO_X and VOC, as well as CO, would be still emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. As shown in Table 6-15, maximum daily air pollution emissions during construction would be comparable to those of the proposed project. Impacts would be less than significant, similar to the proposed project. Similar to the proposed project, standard emission control measures required by the SCAQMD and City of West Hollywood would apply.

Table 6-15
Alternative 4 Construction Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Alternative 4 Maximum Daily Construction Emissions	27.09	39.13	29.75	7.67	4.14	0.07
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Alternative 4 Maximum Daily On-Site Construction Emissions	27.01	26.59	20.87	3.31	2.12	0.02
Local Significant Threshold [2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**	**n/a**
Proposed Project Maximum Daily Construction Emissions for Comparison	25.6	39.1	29.8	7.7	4.1	0.07

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod calculations Alternative 3, see Appendix C
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Construction emissions assumed to comply with Mitigation Measures 3.2-1 and 3.2-2 of the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, which apply to all development in the city. Architectural coating phase assumed to last 60 days and comply with SCAQMD Rule 1113.
[2] LSTs are for a one acre project in SRA-2 within a distance of 82 feet from the site boundary

Operational emissions associated with Alternative 4 are shown in Table 6-16. This alternative would have slightly higher operational emissions for all pollutants compared to the proposed project. Nonetheless, emissions would be below SCAQMD thresholds. As with the proposed project, impacts would be less than significant.

Alternative 4 would generate approximately 1,850 ADT, which would be 129% more vehicle trips than the proposed project (809 ADT). The increase in vehicle trips associated with this alternative would result in higher CO levels at intersection hotspots and increased impacts in comparison to the proposed project. Nonetheless, CO levels at nearby intersections are not anticipated to exceed thresholds. As with the proposed project, CO impacts would be less than significant.

Table 6-16
Alternative 4 Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	6.52	0.02	1.20	0.02	0.02	<0.01
Energy	0.19	1.71	1.43	0.13	0.13	0.01
Mobile	8.87	17.79	76.41	11.67	3.29	0.17
Subtotal	*15.58*	*19.52*	*79.04*	*11.83*	*3.44*	*0.18*
Existing Emissions to be Removed[1]	*(6.21)*	*(9.92)*	*(42.77)*	*(5.51)*	*(1.41)*	*(0.08)*
Net Emissions Increase - Alternative 4	**9.37**	**9.6**	**36.27**	**6.32**	**2.03**	**0.10**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Proposed Project Operational Emissions for Comparison[1]	6.72	5.24	25.12	4.72	1.61	0.07
Maximum Daily On-Site Operational Emissions (area emissions only)[2]	6.52	0.02	1.20	0.02	0.02	<0.01
Local Significant Threshold [3] (on-site only)	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***

Source: Table 2.2, Overall Operational, Mitigated, CalEEMod calculations for Alternative 3, see Appendix C
( ) indicates subtraction. Numbers may not add due to rounding
[1] See Table 4.1-6 in Section 4.1, Air Quality
[2] On-site emissions include area emissions consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[3] LSTs are for a one acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary.

b. Geology and Hydrology. Although this alternative would reduce the overall building size compared to the proposed project, it would be subject to the same potential geological impacts as the proposed project. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same as those of the proposed project. Like the proposed project, this alternative may also require dewatering during construction that could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. Mitigation measures GEO-1, GEO-2, GEO-3(a) and GEO-3(b) required for the proposed project would also apply to this alternative and, similar to the proposed project, would reduce impacts to a less than significant level.

c. Greenhouse Gases. Table 6-17 shows GHG emissions associated with Alternative 4. As shown, Alternative 4 would result in more GHG emissions (2,034 metric tons CO_2E compared to 1,352 metric tons CO_2E) than the proposed project due to the increased number of vehicle trips and increased energy demand for natural gas and electricity. Nonetheless, Alternative 4 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375 and the City of West Hollywood Climate Action Plan. Therefore, impacts would be greater under this alternative but would remain less than significant.

Table 6-17
Alternative 4 Annual Greenhouse Gases Emissions

Emission Source	Annual Emissions (Metric Tons CO_2E)
Alternative 4	
Project Construction	30
Project Operational	
Area	1
Energy	1,049
Solid Waste	104
Water	42
Project Mobile	
CO_2 and CH_4	2,019
N_2O	106
Project Subtotal	**3,351**
Existing Conditions[1]	**(1,317)**
Net Emissions Increase from Alternative 4 (Alternative 4 - Existing)	**2,034 metric tons CO_2E**
Total Emissions from Proposed Project for Comparison	1,352 metric tons CO_2E

Source: Tables 2.1, 2.2 and 4.2 in CalEEMod annual worksheets for Alternative 3, see Appendix C for calculations and for GHG emission factor assumptions.
( ) denotes subtraction.
[1] *See Table 4.4-2 in Section 4.3, Greenhouse Gas Emissions*

d. Land Use and Planning. This alternative would involve development consistent with the existing zoning for the project site and with the green building bonus. However, this alternative would not involve the mixed-use incentive bonus or density bonuses allowed by the City's affordable housing ordinance and SB 1818. Alternative 4's consistency with the City's applicable requirements for FAR, density and building height are shown in Table 6-18. As shown, this alternative would be consistent with the FAR, density and building height requirements of the City's Zoning Ordinance, but would not meet some of the provisions of the City of West Hollywood 2035 General Plan to provide affordable housing and a mixed-use project. For projects with 10 or more apartment units, developers that do not provide housing are required to pay the Affordable Housing In-Lieu Fee to support affordable housing development elsewhere in the City. With fee payment, this alternative would support affordable housing in the City although it would not actually contribute to the City's affordable housing stock. According to the CEQA Guidelines Appendix G, a significant impact may occur if a project conflicts with an applicable land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect. The WHMC and General Plan goals and policies to encourage mixed-use development on the site and provide affordable housing relate to the City's vision for the land use pattern of the area and the provision of housing for residents of all socioeconomic statuses and do not specifically avoid or mitigate an environmental effect. Therefore, although this alternative may be inconsistent with some goals of the General Plan related to mixed-use projects and affordable housing, it would not conflict with any General Plan land use policies or goals adopted for the purpose of avoiding or

mitigating an environmental effect. Therefore, land use impacts for this alternative would be the same as the proposed project and would be less than significant

Table 6-18
Alternative 4 Consistency with Zoning Ordinance

Requirement	Allowed	Proposed Project	Alternative 4
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 +Green Building Bonus FAR: 0.1 *Total Allowed = 1.6*	**Consistent** CC1: 2.8	**Consistent** 1.6
Density[2]	14 units (1 unit for each 872 sf of lot area)	**Consistent** 19 units	**Consistent** 14 units
Building Height	CC1 Allowed Height: 35 ft R4B Allowed Height: 45 ft	**Consistent** CC1: 55 ft R4B: 55 ft	**Consistent** CC1: 45 ft R4B: 45 ft

[1] *FAR used in commercial zoning only*
[2] *Density used in residential zoning only*

e. Noise. Construction-related noise and vibration impacts would be similar to the proposed project because construction of this alternative would require the same types of construction equipment. The duration of construction activities would be similar to, but slightly reduced as compared to that of the proposed project because the scale of development and length of construction would be reduced. As with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation measures N-1a through 1-d would still be required.

Alternative 4 would generate approximately 1,850 net ADT, or about 129% more vehicle trips than would be generated by the proposed project (809 ADT). The increase in vehicle trips associated with this alternative would result in incrementally higher noise levels on study area roadways. Nonetheless, the increase in noise levels on area roadways is not anticipated to exceed standards. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant.

Alternative 4 would include 14 residential units on the portion of the project site zoned R4B that has frontage to West Knoll Drive. As discussed in Section 4.5, *Noise*, existing noise on West Knoll Drive was measured at 58.9 dBA Leq and modeled at 57.3 dBA Leq. Future residences on the project site would not be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. As with the proposed project, impacts would be less than significant.

Operation of Alternative 4 would result in noise from onsite sources such as stationary equipment, rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with hotel, restaurant, and retail activities. Noise levels would be similar to those of the proposed project and would be less than significant.

f. Transportation and Circulation. As with the proposed project, construction activities and associated truck trips and worker trips could temporarily interrupt the local roadway

system. The overall duration of construction activities and associated traffic interruptions would be similar those of the proposed project. However, as with the proposed project, compliance with City of West Hollywood requirements would reduce construction-related impacts to a less than significant level.

As discussed in Section 4.6, *Transportation and Circulation*, the proposed project would generate an estimated 809 new ADT, including 51 AM peak hour, 89 midday peak hour, and 66 PM peak hour trips along study area roadway segments. Alternative 4 would generate approximately 1,850 ADT, including 173 AM peak hour, 162 midday peak hour, and 145 PM peak hour trips. This would be 1,041 (129%) more daily vehicle trips than would be generated by the proposed project. The unavoidably significant impact at the intersection of Hancock Avenue and Holloway Drive under future (2019) conditions in the PM peak hour would remain and would be worse under this alternative. Impacts would remain significant and unavoidable.

Impacts to bicycle facilities, pedestrian facilities, public transportation and the arterial monitoring stations and freeway segments in the CMP network would be less than significant, similar to the proposed project.

g. Utilities and Service Systems. As shown in Table 6-19, Alternative 4 would generate an estimated 27,914 gallons of wastewater per day. Compared to the proposed project, this represents an increase of 4,494 gallons per day, a 19% increase. Impacts related to wastewater infrastructure and treatment would therefore increase under Alternative 4 compared to the proposed project. However, as infrastructure that serves the project is operating at less than 50% capacity, adequate capacity exists to serve the increase in wastewater under Alternative 4. Impacts would remain less than significant.

Table 6-19
Estimated Alternative 4 Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)[1]	Amount (gpd)
Residential Apt 2 BD	14 units	160 gallons/unit	2,240
Auto Parking	84,000 sf [2]	20 gallons/1,000 sf	1,680
Restaurant (Indoor Seating)	452 seats [3]	30 gallons/seat	13,560
Retail	3,678 sf	80 gallons/1,000 sf	294
Hotel	78 rooms	130 gallons/room	10,140
Alternative 4 Wastewater Generation			**27,914**
Proposed Project Wastewater Generation for Comparison			***23,420***

[1] Rates from VCA Engineers, Inc. (2017) based on land use table from the LA County Sanitation District No 4.
[2] Alternative 4 has a 23% reduction in parking (259 compared to 337) compared to proposed project, therefore 29% reduction in parking square footage compared to proposed project (84,000 compared to 109,091).
Notes: sf = square feet, gpd = gallons per day, bd= bedroom, cfs = cubic feet per second
[3] Alternative 4 has a 426% increase in restaurant square footage (2,830 sf for proposed project compared to 14,820 sf for alternative 4) compared to proposed project. Therefore, a 426% increase in restaurant seating assumed (106 seats compared to 452).

h. Consistency with Project Objectives and Feasibility. This alternative would not promote the City's General Plan policies and goals to promote mixed-use developments in the mixed-use overlay. This alternative would not meet many of the project objectives (Objectives 2, 3, 5 and 8), or would meet the project objectives to a lesser degree as compared to the proposed project (Objectives 1, 4, and 7). This alternative would also not achieve several of the 2035 General Plan policies to promote the production of housing in the City. The City recognizes that the WHMC and 2035 General Plan include mixed-use and affordable housing bonuses to encourage the development of residential uses, and such incentives are needed to enhance the City's housing stock. This alternative would not sufficiently utilize the project site to promote the City's policies to increase market-rate and affordable residential units available in the City. This alternative also not provide affordable residential units pursuant to the City and state's SB 1818 requirements, although it would be required to pay an in-lieu fee to support affordable housing development in the City (see *CEQA Guidelines* section 15364). The project applicant proposes an affordable housing project consistent with the WHMC and 2035 General Plan and consistent with the state's affordable housing requirements of SB 1818. This alternative would also not maximize the development potential of the project site, as it would not integrate the two neighboring residential and commercial parcels to create a more integrated and cohesive project. Further, although the project site is in the mixed-use overlay zone, this alternative does not provide for mixed-use on the commercial parcels. This alternative would also not avoid or substantially decrease the project's significant impacts, and would lead to greater impacts with respect to traffic as compared to the proposed project. The following is a discussion of this alternative compared to each objective.

1) *Partially consistent: This alternative would provide additional housing opportunities in the City, but would not provide as many residential units as the proposed project (14 units compared to 97). This alternative would not provide any residential units on the commercial parcels.*
2) *Inconsistent: This alternative would not contribute to the City's stock of affordable housing units.*
3) *Inconsistent: This alternative would not promote the City's General Plan policies to encourage mixed-use developments in the mixed-use overlay and promote mixed uses near existing modes of transportation along Santa Monica Boulevard.*
4) *Partially consistent: This alternative would develop commercial uses along Santa Monica Boulevard, but would underutilize the development potential of the project site.*
5) *Inconsistent: This alternative would not create a high-quality, multi-use development that offers unique living experiences by eliminating most of the proposed project's residential uses.*
6) *Consistent: This alternative would enhance pedestrian activity along Santa Monica Boulevard by providing street-facing restaurant and retail uses.*
7) *Partially consistent: This alternative would provide some retail and housing uses near alternative means of transportation, but not to the same degree as the proposed project.*
8) *Inconsistent: This alternative would not develop the multiple commercial and residential parcels to provide for an integrated urban design with integrated mobility, as the boutique hotel would eliminate the proposed project's integrated mixed-use design for commercial and residential uses.*
9) *Consistent: This alternative would contribute to the City's economic base.*

10) Consistent: This alternative would promote the efficient use of water and energy through incorporation of water and energy conservation measures consistent with the City's Green Building Ordinance.

6.6 ALTERNATIVE 5: NO SUBTERRANEAN PARKING

6.6.1 Alternative Description

This alternative would involve keeping the mixed-use nature and the size of the project, but would move the entire project above ground. Due to the slope of the project site, the ground floor and mezzanine floor would continue to be partially subterranean. However, the fully subterranean parking level would be removed. In order to accommodate removal of the fully subterranean parking level, the mixed-use structure would be 65 feet in height. Approval of a zoning amendment or variance would be required in order to permit the 65-foot building height. The front of the building facing Santa Monica Boulevard would continue to have ground-floor retail. Table 6-20 compares the characteristics of Alternative 5 to the proposed project.

Table 6-20
Alternative 5 Characteristics

	Proposed Project	Alternative 5
Building Floor Area	Commercial Restaurant/Café: 2,820 sf Retail: 15,678 sf Office: 6,079 sf Hair Salon: 3,718 sf Live/work space: 16,673 sf *Subtotal: 44,968 sf* Residential: Apartments: 90,819 sf Residential Lobby: 639 sf Residential Recreation Room: 610 sf Residential Storage: 2,876 sf *Subtotal: 94,944 sf* Circulation (stairs, elevators, corridors, trash shoot), waste/recycling, electrical, shower/locker: 3,823 sf **Total Floor Area: 143,735 sf**	Same
Unit Summary	Apartment Units: 97 units Live/Work Units: 12 units	Same
Affordable Housing	15 units	Same
Height	55 ft	65 ft
Density	97 units/acre	Same
Floor Area Ratio (FAR)	2.8 (CC1 portion only)	Same
Parking	337 spaces	Same

6.6.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing onsite structures and construction of a mixed-use building that would generate temporary increases in localized air pollutant emissions. Ozone precursors NO_X and VOC, as well as CO, would be still emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. However, as construction would not involve excavation for the subterranean parking level, air quality impacts associated with soil disturbance during excavation and truck trips for the export of earth materials would be reduced. Therefore, Alternative 5 would result in slightly reduced construction-related emissions when compared to the proposed project. Standard emission control measure as required by SCAQMD and the City of West Hollywood would still apply. Impacts would remain less than significant.

This alternative would generate the same amount of demand for energy and the same number of vehicle trips. Therefore, operational impacts and CO impacts would be the same as the proposed project and would remain less than significant.

b. Geology and Hydrology. This alternative would be the same size as the proposed project and therefore it would be subject to the same potential geological impacts as the proposed project, although to a slightly lesser degree since the subterranean parking garage would not be constructed. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same under this alternative as the proposed project. Mitigation Measures GEO-1 and GEO-2 required for the proposed project would also apply to this alternative. This alternative would not require excavation for the subterranean parking garage. Due to the height of the water table relative to the depth of grading for this alternative, dewatering during construction would not be required. Therefore, Mitigation Measures GEO-3(a) and GEO-3(b) would not be required and impacts would be reduced compared to the proposed project and would be less than significant.

c. Greenhouse Gases. Alternative 5 would result in the same operational GHG emissions as the proposed project because the vehicle trips and energy demand would remain the same. GHG emissions related to construction activities would be incrementally reduced as there would be less excavation and fewer trip trips to export soils materials. Alternative 5 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375 and the City of West Hollywood Climate Action Plan. Impacts would remain less than significant.

d. Land Use and Planning. This alternative would involve a 65-foot high structure, which would exceed the allowed height even with the mixed-use height bonus and affordable housing concession (see Table 6-21). Since this alternative exceeds the height limit, a zone amendment or variance would be required. Impacts would be greater than the proposed project and would be significant and unavoidable**.**

Table 6-21
Alternative 5 Consistency with Zoning Ordinance and General Plan

Requirement	Allowed	Proposed Project	Alternative 5
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 + 35% Density Bonus for Affordable Housing: 0.70 +Green Building Bonus FAR: 0.1 *Total Allowed = 2.8*	**Consistent** CC1: 2.8	**Consistent** 2.8
Density[2]	14 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 5 units as 35% bonus for affordable units *Total Allowed = 19 units*	**Consistent** 19 units	**Consistent** 19 units
Building Height	CC1 Allowed Height: 35 ft + Mixed-Use Bonus Height: 10 feet + Affordable Housing Concession: 10 ft *Total Allowed: 55 feet* R4B Allowed Height: 45 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*	**Consistent** CC1: 55 ft R4B: 55 ft	**INCONSISTENT** CC1: 65 ft R4B: 65 ft

[1] *FAR used in commercial zoning only*
[2] *Density used in residential zoning only*

e. Noise. Construction-related noise and vibration impacts during the excavation and grading phase would be reduced compared to the proposed project because Alternative 5 construction would not involve excavation for the subterranean parking garage. Nonetheless, as with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation measures N-1a through 1-d would still be required.

The number of vehicle trips under Alternative 5 would remain the same as the proposed project. Therefore, noise levels on study area roadways would remain the same. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant.

Alternative 5 would include the same number of residential and live/work units as the proposed project. As discussed in Section 4.5, *Noise*, existing noise on Santa Monica Boulevard was measured at 70.5 dBA Leq and modeled at 71.9 dBA Leq. As a result, future residences on the project site may be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. As such, Mitigation Measure N-3 would still be required to reduce impacts associated with exposure of future residents to roadway noise. As with the proposed project, impacts would be less than significant with mitigation.

Operation of Alternative 5 would result in noise from onsite sources such as stationary equipment, rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with restaurant, office, and retail activities. With this alternative, parking would be placed above ground and noise associated with parking activities may incrementally

increase compared to the proposed project. However, noise levels would be similar to those of the proposed project and would be less than significant.

f. Transportation and Circulation. As with the proposed project, construction activities and associated truck trips and worker trips could temporarily interrupt the local roadway system. The overall duration of construction activities and associated traffic interruptions would be similar those of the proposed project. However, as with the proposed project, compliance with City of West Hollywood requirements would reduce construction-related impacts to a less than significant level.

Since the estimated trip generation of Alternative 5 is identical to the proposed project and the incremental increases in delay at the analyzed intersections, it would not result in any new significant impacts. The unavoidably significant impact at the intersection of Hancock Avenue and Holloway Drive under future (2019) conditions in the PM peak hour would remain and would be worse under this alternative. Impacts would remain significant and unavoidable.

Impacts to bicycle facilities, pedestrian facilities, public transportation and the arterial monitoring stations and freeway segments in the CMP network would be less than significant, similar to the proposed project.

g. Utilities and Service Systems. Alternative 5 would involve the same uses as the proposed project. Therefore, wastewater generation would be the same as the proposed project and impacts would remain less than significant.

h. Consistency with Project Objectives and Feasibility. This alternative would be identical to the proposed project, except the parking would not be subterranean and therefore the project would be 65 feet in height. As such, this project would not be consistent with the WHMC and General Plan. Given the required design changes to the project, this project would also be inconsistent or only partially consistent with several of the project objectives. Further, this alternative would not avoid or substantially lessen any of the project significant impacts and could potentially create greater impacts related to aesthetics and consistency with the City's land use policies. The following is a discussion of this alternative compared to each project objective.

1) *Consistent: This alternative would provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing urban core.*
2) *Consistent: This alternative would provide affordable residential units and would increase the City's housing stock.*
3) *Partially consistent: This alternative would not develop the site in accordance with the City's policies and designations while furthering the goals and objectives of the General Plan because those goals and objectives include promoting development to enhance the pedestrian experience, to promote development consistent with the scale of the neighborhood (General Plan Goal LU-1), and to promote development that will screen parking form public view (General Plan Goal LU-4).*
4) *Consistent: This alternative would involve redeveloping an underutilized site and would continue a pattern of commercial development.*

5) *Consistent: This alternative would create a modern, high-quality multi-use development that will enhance the pedestrian experience.*
6) *Partially consistent: This alternative would not enhance pedestrian activity along Santa Monica Boulevard to the same degree as the proposed project given the requirement to provide parking as one of the project's above-ground primary uses.*
7) *Consistent: This alternative would provide housing and retail near alternative means of transportation and would provide sufficient on-site parking.*
8) *Inconsistent: Given the extra height and above-ground parking that would not be shielded from public view, this alternative would not develop a mixed-use project that can provide for an integrated urban design.*
9) *Consistent: This alternative would expand the City's economic base and provide commercial and retail activities.*
10) *Consistent: This alternative would include water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.7 ALTERNATIVE 6: REDUCED DENSITY ON R4B LOTS

6.7.1 Alternative Description

This alternative would not include provisions for density bonuses and incentives pursuant to state law (SB 1818) for affordable housing on the portion of the site zoned R4B, nor would it include the three requested regulatory concessions on the R4B portion of the site. The requested incentive for a 10% front yard setback on the R4B lots would be replaced with a requested incentive for a 10% rear setback on commercial lots.

This alternative would involve keeping the mixed-use nature of the project. The number of residential units in Alternative 6 would decrease by two units for a total of 95 but would increase the total of Live/Work units by three for a total of 15 units. The number of residential units on the R4B lots would be reduced from 19 units to 14 units, and the number of residential units on the CC1 lots would increase by three. Parking under Alternative 6 would have 349 spaces compared to 337 for the proposed project. This alternative would also allow right and left turns out of the driveway on West Knoll Drive.

Table 6-22 compares the characteristics of Alternative 6 to the proposed project.

6.7.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing onsite structures and construction of a mixed-use building that would generate temporary increases in localized air pollutant emissions. Ozone precursors NO_X and VOC, as well as CO, would still be emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. As shown in Table 6-23, maximum daily air pollution emissions during construction would be slightly lower than those of the proposed project. Impacts would be less than significant, similar to the proposed project. Similar to the proposed project, standard emission control measures required by the SCAQMD and City of West Hollywood would apply.

Table 6-22
Alternative 6 Characteristics

	Proposed Project	Alternative 6	
		CC1 Lot	R4B Lot
Building Floor Area	Commercial Restaurant/Café: 2,820 sf Retail: 15,678 sf Office: 6,079 sf Hair Salon: 3,718 sf Live/work space: 16,673 sf *Subtotal: 44,968 sf* Residential: Apartments: 90,819 sf Residential Lobby: 639 sf Residential Recreation Room: 610 sf Residential Storage: 2,876sf *Subtotal: 94,944 sf* Circulation, waste, electrical: 3,823 sf **Total Floor Area: 143,735 sf**	Commercial Restaurant/Café: 4,948 sf Retail: 13,550 sf Office: 6,856 sf Hair Salon: 3,643 sf Live/work space: 15,814 sf *Subtotal: 44,811 sf* Residential: Apartments: 86,276 sf Lobby, storage, circulation, waste, electrical, etc.: 8,433 sf **Total Floor Area: 139,520 sf**	14 units
Unit Summary	Apartment Units: 97 units Live/Work Units: 12 units	Apartment Units: 81 units Live/Work Units: 15 units	Apartment Units: 14*
Affordable Housing	15 units	12 units	0 units
Height	55 feet	55 feet	45 feet
Floor Area Ratio (FAR)	2.8 (commercial portion only)	2.8 *(1.5 FAR Allowed + 0.5 FAR Mixed Use Bonus + 0.1 FAR Green Building Incentive Bonus)*	N/A
Parking	337 spaces	321 spaces	28 spaces

** 14 units on R4B lots without SB 1818 (no extra height, no extra level and no extra bonus), in lieu fees for affordable housing and 10% modification to increase 1,200 maximum average sf to 1,320 for 14 units (14 x 1,320 = 18,480 sf).*

Operational emissions associated with Alternative 6 are shown in Table 6-24. This alternative would have slightly higher operational emission for all pollutants, except VOC, compared to the proposed project. As with the proposed project, impacts would be less than significant.

Alternative 6 would generate approximately 997 net ADT, which would be 23% more vehicle trips than the proposed project (809 ADT). Therefore, the addition of vehicle trips associated with this alternative would result in higher CO levels at intersection hotspots. Nonetheless, CO levels at nearby intersections are not anticipated to exceed thresholds. As with the proposed project, CO impacts to would be less than significant.

Table 6-23
Alternative 6 Construction Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Alternative 6 Maximum Daily Construction Emissions	9.1	29.3	24.9	3.2	1.8	0.05
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Alternative 6 Maximum Daily On-Site Construction Emissions	2.8	26.8	15.6	2.6	1.7	0.02
Local Significant Threshold [2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**	**n/a**
Proposed Project Maximum Daily Construction Emissions for Comparison	25.6	39.1	29.8	7.7	4.1	0.07

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod calculations Alternative 6, see Appendix C
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Construction emissions assumed to comply with Mitigation Measures 3.2-1 and 3.2-2 of the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, which apply to all development in the city. Architectural coating phase assumed to last 100 days and comply with SCAQMD Rule 1113.
[2] LSTs are for a one acre project in SRA-2 within a distance of 82 feet from the site boundary

Table 6-24
Alternative 6 Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	3.33	0.11	9.16	0.05	0.05	<0.01
Energy	0.06	0.58	0.37	0.04	0.04	<0.01
Mobile	5.40	24.08	61.07	11.28	3.20	0.17
Subtotal	*8.79*	*24.76*	*70.60*	*11.37*	*3.30*	*0.18*
Existing Emissions to be Removed[1]	*(6.21)*	*(9.92)*	*(42.77)*	*(5.51)*	*(1.41)*	*(0.08)*
Net Emissions Increase - Alternative 6	**2.58**	**14.84**	**27.83**	**5.86**	**1.89**	**0.10**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Proposed Project Operational Emissions for Comparison[1]	6.72	5.24	25.12	4.72	1.61	0.07
Maximum Daily On-Site Operational Emissions (area emissions only)[2]	3.33	0.11	9.16	0.05	0.05	<0.01
Local Significant Threshold [3] (on-site only)	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***

Source: Table 2.2, Overall Operational, Mitigated, CalEEMod calculations for Alternative 7, see Appendix C
( ) indicates subtraction, Numbers may not add due to rounding
[1] See Table 4.1-6 in Section 4.1, Air Quality
[2] On-site emissions include area emissions consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[3] LSTs are for a one acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary

b. Geology and Hydrology. This alternative would be similar in size as the proposed project and therefore it would be subject to the same potential geological impacts as the proposed project. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same as those of the proposed project. Like the proposed project, this alternative may also require dewatering during construction that could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. Mitigation measures GEO-1, GEO-2, GEO-3(a) and GEO-3(b) required for the proposed project would also apply to this alternative and, similar to the proposed project, would reduce impacts to a less than significant level.

c. Greenhouse Gases. Table 6-25 shows GHG emissions associated with Alternative 6. As shown, Alternative 6 would result in more GHG emissions (2,449 metric tons CO_2E compared to 1,352 metric tons CO_2E) than the proposed project due to the increased number of vehicle trips and increased energy demand for natural gas and electricity. Nonetheless, Alternative 6 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375 and the City of West Hollywood Climate Action Plan. Therefore, impacts would be greater under this alternative but would remain less than significant.

Table 6-25
Alternative 6 Annual Greenhouse Gases Emissions

Emission Source	**Annual Emissions (Metric Tons CO_2E)**
Alternative 6	
Project Construction	10
Project Operational	
Area	2
Energy	759
Solid Waste	68
Water	84
Project Mobile	
CO_2 and CH_4	2,739
N_2O	104
Project Subtotal	**3,766**
Existing Conditions[1]	**(1,317)**
Net Emissions Increase from Alternative 6 (Alternative 6 - Existing)	**2,449 metric tons CO_2E**
Total Emissions from Proposed Project for Comparison	1,352 metric tons CO_2E

Source: Tables 2.1, 2.2 and 4.2 in CalEEMod annual worksheets for Alternative 6, see Appendix C for calculations and for GHG emission factor assumptions.
( ) denotes subtraction.
[1] *See Table 4.4-2 in Section 4.3, Greenhouse Gas Emissions.*

d. Land Use and Planning. This alternative would involve development consistent with the existing zoning for the project site with the affordable housing bonus, green building bonus and mixed-use incentive bonus on the commercially-zoned portion of the site. However, this alternative would not involve the density bonuses allowed by the City's affordable housing

ordinance and SB 1818 on the residentially-zoned portion of the site. Alternative 6's consistency with the City's applicable requirements for FAR, density, and building height are shown in Table 6-26. This alternative would provide three fewer affordable housing units and therefore would not provide the required 20% affordable units and may be required to pay an in-lieu affordable housing fee. The project would be consistent with the City's General Plan goals related to mixed-use development on the site and to contribute to the City's affordable housing stock. This alternative would not conflict with any General Plan land use policies or goals adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be the same as the proposed project and would be less than significant.

Table 6-26
Alternative 6 Consistency with Zoning Ordinance and General Plan

Requirement	Allowed	Proposed Project	Alternative 6
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 + 35% Density Bonus for Affordable Housing: 0.70 +Green Building Bonus FAR: 0.1 *Total Allowed = 2.8*	**Consistent** CC1: 2.8	**Consistent** 2.8
Density[2]	14 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 5 units as 35% bonus for affordable units *Total Allowed = 19 units*	**Consistent** 19 units *(with density bonus)*	**Consistent** 14 units *(no density bonus)*
Building Height	CC1 Allowed Height: 35 ft, + Mixed-Use Bonus Height: 10 feet + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft* R4B Allowed Height: 45 ft, + Affordable Housing Concession: 10 ft *Total Allowed: 55 ft*	**Consistent** CC1: 55 ft R4B: 55 ft *(with density bonus)*	**Consistent** CC1: 55 ft, R4B: 45 ft *(no density bonus)*

[1] *FAR used in commercial zoning only.*
[2] *Density used in residential zoning only.*

e. Noise. Construction-related noise and vibration impacts during building construction would be similar to the proposed project because construction of this alternative would require the same types of construction equipment. As with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation measures N-1a through 1-d would still be required.

The number of vehicle trips under Alternative 7 would increase from 809 to 997 trips. The increase in 188 vehicle trips associated with this alternative could result in slight incrementally higher noise levels on study area roadways. Nonetheless, the increase in noise levels on area roadways is not anticipated to exceed standards. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant. Therefore, noise levels on study area roadways would remain the same.

Alternative 6 would include two less residential and three additional live/work units to the proposed project. As discussed in Section 4.5, *Noise*, existing noise on Santa Monica Boulevard

was measured at 70.5 dBA Leq and modeled at 71.9 dBA Leq. As a result, future residences on the project site may be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. As such, Mitigation Measure N-3 would still be required to reduce impacts associated with exposure of future residents to roadway noise. As with the proposed project, impacts would be less than significant with mitigation.

Operation of Alternative 6 would result in noise from onsite sources such as stationary equipment, rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with restaurant, office, and retail activities. Noise levels would be similar to those of the proposed project and would be less than significant.

f. Transportation and Circulation. As with the proposed project, construction activities and associated truck trips and worker trips could temporarily interrupt the local roadway system. The overall duration of construction activities and associated traffic interruptions would be similar to those of the proposed project. However, as with the proposed project, compliance with City of West Hollywood requirements would reduce construction-related impacts to a less than significant level.

As discussed in Section 4.6, *Transportation and Circulation*, the proposed project would generate an estimated 809 new ADT, including 51 AM peak hour, 89 midday peak hour, and 66 PM peak hour trips along study area roadway segments. Alternative 6 would generate approximately 997 ADT, including 75 AM peak hour, 106 midday peak hour, and 84 PM peak hour trips. This would be 188 (23%) more daily vehicle trips than would be generated by the proposed project. While Alternative 6's trip generation is greater than the proposed project, it allows for a different access scheme (both right and left turns out of the driveway on West Knoll Drive) that results in a revised project assignment on the local street network. The potential impacts for this alternative were fully evaluated with a future and existing with and without project intersection analysis of all peak hours as part of the traffic report for the project (Fehr & Peers 2017). This analysis found that with the revised access scheme, Alternative 6 would not result in any significant intersection or segment impacts. Therefore, this alternative would eliminate the significant and unavoidable impact at the intersection of Hancock Avenue & Holloway Drive. Impacts would be less than significant.

Impacts to bicycle facilities, pedestrian facilities, public transportation and the arterial monitoring stations and freeway segments in the CMP network would be less than significant, similar to the proposed project.

g. Utilities and Service Systems. As shown in Table 6-27, Alternative 6 would generate an estimated 27,252 gallons of wastewater per day. Compared to the proposed project, this represents an increase of 3,832 gallons per day, a 16% increase. Impacts related to wastewater infrastructure and treatment would therefore increase under Alternative 6 compared to the proposed project. However, as infrastructure that serves the project is operating at less than 50% capacity, adequate capacity exists to serve the increase in wastewater under Alternative 6. Impacts would remain less than significant.

Table 6-27
Alternative 6 Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)[1]	Amount (gpd)
Residential Apt 2 BD	95 units	160 gallons/unit	15,200
Residential Live/Work	15 units	120 gallons/unit	1,800
Auto Parking	113,455 sf [2]	20 gallons/1,000 sf	2,269
Restaurant (Indoor Seating)	186 seats [3]	30 gallons/seat	5,580
Office	6,856 sf	150 gallons/1,000 sf	1,028
Retail	17,193 sf[4]	80 gallons/1,000 sf	1,375
Alternative 6 Wastewater Generation			**27,252**
Proposed Project Wastewater Generation for Comparison			***23,420***

[1] Rates from VCA Engineers, Inc. (2017) based on land use table from the LA County Sanitation District No 4.
[2] Alternative 6 has a 4% increase in parking (349 compared to 337) compared to proposed project. therefore a 4% increase in parking square footage compared to proposed project (113,455 compared to 109,091)
[3]Alternative 6 has a 75% increase in restaurant square footage (4,948 compared to 2,820) compared to proposed project, therefore a 75% increase in restaurant seating assumed (106 seats compared to 861).
[4]Includes hair salon floor area
Notes: sf = square feet, gpd = gallons per day, bd= bedroom

h. Consistency with Project Objectives and Feasibility. This alternative would be similar to the proposed project but would reduce the total amount of residential space while adding Live/Work units (although the total square footage of the Live/Work units would be smaller than the proposed project). This alternative would provide three fewer affordable housing units than the proposed project and would not pursuant to the density credits allowed under SB 1818 on the R4B portion of the site. This alternative would avoid the significant and unavoidable impact at the intersection of Hancock Avenue & Holloway Drive**.** The following is a discussion of this alternative compared to each project objective.

1) *Consistent: This alternative would provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing urban core.*
2) *Consistent: This alternative would contribute to the City's stock of affordable residential units by providing 12 affordable housing units and by paying the City's affordable housing fees for the RB4 portion of the site.*
3) *Consistent: This alternative would develop the site in accordance with the City's policies and designations while furthering the goals and objectives of the General Plan to include promoting development to enhance the pedestrian experience, to promote development consistent with the scale of the neighborhood (General Plan Goal LU-1), and to promote development that will screen parking from public view (General Plan Goal LU-4).*
4) *Consistent: This alternative would involve redeveloping an underutilized site and would continue a pattern of commercial development.*
5) *Consistent: This alternative would create a modern, high-quality multi-use development that will enhance the pedestrian experience.*
6) *Consistent: This alternative would enhance pedestrian activity along Santa Monica Boulevard to the same degree as the proposed project.*

7) *Consistent: This alternative would provide housing and retail near alternative means of transportation and would provide sufficient on-site parking.*
8) *Consistent: This alternative would develop a mixed-use project that can provide for an integrated urban design.*
9) *Consistent: This alternative would expand the City's economic base and provide commercial and retail activities.*
10) *Consistent: This alternative would include water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.8 ALTERNATIVE 7: MODIFIED PROJECT

6.8.1 Alternative Description

This alternative would be similar to the proposed project but slightly modified. It would involve keeping the mixed-use nature of the project but would increase the total of Live/Work units by three for a total of 15 units (although the total square footage of the Live/Work units would be smaller than the proposed project), would provide slightly more office space (6,856 sf compared to 6,079 sf) and slightly less hair salon space (3,643 sf compared to 3,718 sf). Parking under Alternative 7 would remove two spaces for a total of 335 compared to 337 for the proposed project. This alternative would also allow full access for the driveway on West Knoll Drive, which would serve only residential project trips.

Table 6-28 compares the characteristics of Alternative 7 to the proposed project.

Table 6-28
Alternative 7 Characteristics

	Proposed Project	**Alternative 7**
Building Floor Area	Commercial Restaurant/Café: 2,820 sf Retail: 15,678 sf Office: 6,079 sf Hair Salon: 3,718 sf Live/work space: 16,673 sf *Subtotal: 44,968 sf* Residential*:* Apartments: 90,819 sf Residential Lobby: 639 sf Residential Recreation Room: 610 sf Residential Storage: 2,876 sf *Subtotal: 94,944 sf* Circulation, waste, electrical: 3,823 sf **Total Floor Area: 143,735 sf**	Commercial Restaurant/Café: 2,810 sf Retail: 15,654 sf Office: 6,856 sf Hair Salon: 3,643 sf Live/work space: 15,814 sf *Subtotal: 44,777 sf* Residential: Apartments: 90,596 sf Lobby, storage, circulation, waste, electrical, etc.: 8,433 sf **Total Floor Area: 143,806 sf**
Unit Summary	Apartment Units: 97 units Live/Work Units: 12 units	Apartment Units: 97 units Live/Work Units: 15 units
Affordable Housing	15 units	Same
Height	55 feet	Same
Floor Area Ratio (FAR)	2.8 (commercial portion only)	Same
Parking	337 spaces	335 spaces

6.8.2 Impact Analysis

a. Air Quality. As with the proposed project, this alternative would include demolition of existing onsite structures and construction of a mixed-use building that would generate temporary increases in localized air pollutant emissions. Ozone precursors NO_X and VOC, as well as CO, would still be emitted by the operation of construction equipment such as graders, backhoes, and generators, while fugitive dust (PM_{10}) would still be emitted by activities that disturb the soil, such as grading and excavation and building construction. As shown in Table 6-29, maximum daily air pollution emissions during construction would be slightly lower than those of the proposed project. Impacts would be less than significant, similar to the proposed project. Similar to the proposed project, standard emission control measures required by the SCAQMD and City of West Hollywood would apply.

Operational emissions associated with Alternative 7 are shown in Table 6-30. This alternative would have slightly lower operational emissions for VOC and CO, but slightly higher operational emission for NO_X, PM_{10}, $PM_{2.5}$, and SO_X, compared to the proposed project. However, as with the proposed project, impacts would be less than significant.

Alternative 7 would generate approximately 831 net ADT, which would be approximately 3% more vehicle trips than the proposed project (809 ADT). Therefore, the addition of vehicle trips associated with this alternative could result in higher CO levels at intersection hotspots. Nonetheless, CO levels at nearby intersections are not anticipated to exceed thresholds. As with the proposed project, CO impacts to would be less than significant.

Table 6-29
Alternative 7 Construction Emissions

	Maximum Emissions (lbs/day)[1]					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Alternative 7 Maximum Daily Construction Emissions	13.62	29.33	28.44	3.67	2.00	0.06
SCAQMD Regional Thresholds	*75*	*100*	*550*	*150*	*55*	*150*
Threshold Exceeded?	**No**	**No**	**No**	**No**	**No**	**No**
Alternative 6 Maximum Daily On-Site Construction Emissions	2.76	26.76	15.56	2.60	1.73	0.02
Local Significant Threshold [2] (on-site only)	*n/a*	*103*	*562*	*4*	*3*	*n/a*
Threshold Exceeded?	**n/a**	**No**	**No**	**No**	**No**	**n/a**
Proposed Project Maximum Daily Construction Emissions for Comparison	25.6	39.1	29.8	7.7	4.1	0.07

Source: Table 2.1, Overall Construction, Mitigated, CalEEMod calculations Alternative 7, see Appendix C
[1] Totals include emissions associated with site grading, offsite earth export, and worker trips. Construction emissions assumed to comply with Mitigation Measures 3.2-1 and 3.2-2 of the Final Program EIR for the City of West Hollywood General Plan 2035 and Climate Action Plan, which apply to all development in the city. Architectural coating phase assumed to last 100 days and comply with SCAQMD Rule 1113.
[2] LSTs are for a one acre project in SRA-2 within a distance of 82 feet from the site boundary

Table 6-30
Alternative 7 Operational Emissions

	Emissions (lbs/day)					
	VOC	**NO_X**	**CO**	**PM_{10}**	**$PM_{2.5}$**	**SO_X**
Area	3.42	0.11	9.32	0.05	0.05	<0.01
Energy	0.05	0.45	0.27	0.04	0.04	<0.01
Mobile	5.06	22.78	58.21	10.61	3.03	0.16
Subtotal	*8.52*	*23.33*	*67.81*	*10.70*	*3.11*	*0.16*
Existing Emissions to be Removed[1]	*(3.00)*	*(9.92)*	*(42.77)*	*(5.51)*	*(1.41)*	*(0.08)*
Net Emissions Increase - Alternative 7	**5.52**	**13.41**	**25.04**	**5.19**	**1.70**	**0.08**
SCAQMD Thresholds	*55*	*55*	*550*	*150*	*55*	*150*
Threshold Exceeded?	***No***	***No***	***No***	***No***	***No***	***No***
Proposed Project Operational Emissions for Comparison[1]	6.72	5.24	25.12	4.72	1.61	0.07
Maximum Daily On-Site Operational Emissions (area emissions only)[2]	3.42	0.11	9.32	0.05	0.05	<0.01
Local Significant Threshold [3] (on-site only)	*n/a*	*103*	*562*	*1*	*1*	*n/a*
Threshold Exceeded?	***n/a***	***No***	***No***	***No***	***No***	***n/a***

Source: Table 2.2, Overall Operational, Mitigated, CalEEMod calculations for Alternative 7, see Appendix C
( ) indicates subtraction, Numbers may not add due to rounding
[1] See Table 4.1-6 in Section 4.1, Air Quality
[2] On-site emissions include area emissions consumer products, architectural coatings, and landscaping equipment) only. Operational emissions due to vehicle idling on-site are not calculated in CalEEMod and are expected to be negligible.
[3] LSTs are for a one acre project in SRA-2 with the nearest sensitive receptor a distance of 82 feet from the site boundary

b. Geology and Hydrology. This alternative would be similar in size as the proposed project and therefore it would be subject to the same potential geological impacts as the proposed project. Therefore, the potential for adverse effects caused by unstable soils and slopes would be approximately the same as those of the proposed project. Like the proposed project, this alternative may also require dewatering during construction that could affect the local groundwater table and result in the discharge of potentially contaminated groundwater. Mitigation measures GEO-1, GEO-2, GEO-3(a) and GEO-3(b) required for the proposed project would also apply to this alternative and, similar to the proposed project, would reduce impacts to a less than significant level.

c. Greenhouse Gases. Table 6-31 shows GHG emissions associated with Alternative 7. As shown, Alternative 7 would result in more GHG emissions (2,297 metric tons CO_2E compared to 1,352 metric tons CO_2E) than the proposed project due to the increased number of vehicle trips and increased energy demand for natural gas and electricity. Nonetheless, Alternative 7 would be consistent with applicable plans and policies adopted for the purpose of reducing GHG emissions, including SB 375 and the City of West Hollywood Climate Action Plan. Therefore, impacts would be greater under this alternative but would remain less than significant.

Table 6-31
Alternative 7 Annual Greenhouse Gases Emissions

Emission Source	Annual Emissions (Metric Tons CO_2E)
Alternative 7	
Project Construction	11
Project Operational	
Area	2
Energy	627
Solid Waste	56
Water	82
Project Mobile	
CO_2 and CH_4	2,736
N_2O	100
Project Subtotal	**3,614**
Existing Conditions[1]	**(1,317)**
Net Emissions Increase from Alternative 7 (Alternative 7 - Existing)	**2,297 metric tons CO_2E**
Total Emissions from Proposed Project for Comparison	1,352 metric tons CO_2E

Source: Tables 2.1, 2.2 and 4.2 in CalEEMod annual worksheets for Alternative 4, see Appendix C for calculations and for GHG emission factor assumptions.
( ) denotes subtraction
[1] *See Table 4.4-2 in Section 4.3, Greenhouse Gas Emissions*

d. Land Use and Planning. This alternative would involve development consistent with the existing zoning for the project site with the green building bonus and mixed-use incentive bonus and affordable housing bonus. Alternative 7's consistency with the City's applicable requirements for FAR, density, and building height are shown in Table 6-32. As shown, this alternative would be consistent with all City regulations and requirements. This alternative would also be consistent with the City's General Plan goals to have mixed-use development on the site and to provide affordable housing. Impacts would be the same as the proposed project and would be less than significant.

Table 6-32
Alternative 7 Consistency with Zoning Ordinance and General Plan

Requirement	Allowed	Proposed Project	Alternative 7
Floor Area Ratio (FAR)[1]	CC1 Base FAR: 1.5 + Mixed-Use Bonus FAR: 0.5 + 35% Density Bonus for Affordable Housing: 0.70 +Green Building Bonus FAR: 0.1 *Total Allowed = 2.8*	**Consistent** CC1: 2.8	**Consistent** 2.8
Density[2]	14 units (1 unit for each 872 sf of lot area) + Affordable Housing Bonus: additional 5 units as 35% bonus for affordable units *Total Allowed = 19 units*	**Consistent** 19 units	**Consistent** 19 units
Building Height	CC1 Allowed Height: 35 ft, + Mixed-Use Bonus Height: 10 ft + Affordable Housing Concession: 10 ft *Total Allowed: 55 feet*	**Consistent** CC1: 55 ft	**Consistent** CC1: 55 ft,

[1] *FAR used in commercial zoning only*
[2] *Density used in residential zoning only*

e. Noise. Construction-related noise and vibration impacts during building construction would be similar to the proposed project because construction of this alternative would require the same types of construction equipment. As with the proposed project, construction noise and vibration impacts would be significant and unavoidable. Mitigation measures N-1a through 1-d would still be required.

The number of vehicle trips under Alternative 7 would increase from 809 to 831 trips. The increase in vehicle trips associated with this alternative could result in slight incrementally higher noise levels on study area roadways. Nonetheless, the increase in noise levels on area roadways is not anticipated to exceed standards. As with the proposed project, traffic-related noise impacts to existing sensitive receptors would be less than significant. Therefore, noise levels on study area roadways would remain the same.

Alternative 7 would include the same number of residential and three additional live/work units to the proposed project. As discussed in Section 4.5, *Noise*, existing noise on Santa Monica Boulevard was measured at 70.5 dBA Leq and modeled at 71.9 dBA Leq. As a result, future residences on the project site may be exposed to a "normally unacceptable" noise level according to the City of West Hollywood General Plan Safety and Noise Element. As such, Mitigation Measure N-3 would still be required to reduce impacts associated with exposure of future residents to roadway noise. As with the proposed project, impacts would be less than significant with mitigation.

Operation of Alternative 7 would result in noise from onsite sources such as stationary equipment, rooftop ventilation and heating systems, trash hauling, conversations and other noises associated with restaurant, office, and retail activities. Noise levels would be similar to those of the proposed project and would be less than significant.

f. Transportation and Circulation. As with the proposed project, construction activities and associated truck trips and worker trips could temporarily interrupt the local roadway system. The overall duration of construction activities and associated traffic interruptions would be similar to those of the proposed project. However, as with the proposed project, compliance with City of West Hollywood requirements would reduce construction-related impacts to a less than significant level.

As discussed in Section 4.6, *Transportation and Circulation*, the proposed project would generate an estimated 809 new ADT, including 51 AM peak hour, 89 midday peak hour, and 66 PM peak hour trips along study area roadway segments. Alternative 7 would generate approximately 831 ADT, including 55 AM peak hour, 92 midday peak hour, and 69 PM peak hour trips. This would be 22 (3%) more daily vehicle trips than would be generated by the proposed project. While this project has the similar trip generation as the proposed project, it allows for a different access scheme (both right and left turns out of the driveway on West Knoll Drive) that results in a revised project assignment on the local street network. The potential impacts for this alternative were fully evaluated with a future and existing with and without project intersection analysis of all peak hours as part of the traffic report for the project (Fehr & Peers 2017). This analysis found that with the revised access scheme, this alternative would not result in any significant intersection or segment impacts. Therefore, this alternative would eliminate the significant and unavoidable impact at the intersection of Hancock Avenue & Holloway Drive. Impacts would be less than significant.

Impacts to bicycle facilities, pedestrian facilities, public transportation and the arterial monitoring stations and freeway segments in the CMP network would be less than significant, similar to the proposed project.

g. Utilities and Service Systems. As shown in Table 6-33, Alternative 7 would generate an estimated 25,232 gallons of wastewater per day. Compared to the proposed project, this represents an increase of 1,812 gallons per day, an 8% increase. Impacts related to wastewater infrastructure and treatment would therefore increase under Alternative 7 compared to the proposed project. However, as infrastructure that serves the project is operating at less than 50% capacity, adequate capacity exists to serve the increase in wastewater under Alternative 7. Impacts would remain less than significant.

Table 6-33
Alternative 7 Wastewater Generation

Type of Use	Quantity	Generation Factor (per day)[1]	Amount (gpd)
Residential Apt 2 BD	97 units	160 gallons/unit	15,520
Residential Live/Work	15 units	120 gallons/unit	1,800
Auto Parking	108,000 sf [2]	20 gallons/1,000 sf	2,160
Restaurant (Indoor Seating)	106 seats [3]	30 gallons/seat	3,180
Office	6,856 sf	150 gallons/1,000 sf	1,028
Retail	19,297sf	80 gallons/1,000 sf	1,544
Alternative 7 Wastewater Generation			**25,232**
Proposed Project Wastewater Generation for Comparison			***23,420***

[1] Rates from VCA Engineers, Inc. (2017) based on land use table from the LA County Sanitation District No 4.
[2] Alternative 7 has a 1% decrease in parking (335 compared to 337) compared to proposed project, therefore 1% decrease in parking square footage compared to proposed project (108,000 compared to 109,091).
[3] Alternative 7 has a 10 sf decrease in restaurant floor area and number of seats would be the same as the proposed project
Notes: sf = square feet, gpd = gallons per day, bd= bedroom

h. Consistency with Project Objectives and Feasibility. This alternative would be similar to the proposed project but slightly modified. The following is a discussion of this alternative compared to each project objective.

1) *Consistent: This alternative would provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing urban core.*
2) *Consistent: This alternative would contribute to the City's stock of affordable residential units by providing 15 affordable housing units.*
3) *Consistent: This alternative would develop the site in accordance with the City's policies and designations while furthering the goals and objectives of the General Plan to include promoting development to enhance the pedestrian experience, to promote development consistent with the scale of the neighborhood (General Plan Goal LU-1), and to promote development that will screen parking from public view (General Plan Goal LU-4).*
4) *Consistent: This alternative would involve redeveloping an underutilized site and would continue a pattern of commercial development.*
5) *Consistent: This alternative would create a modern, high-quality multi-use development that will enhance the pedestrian experience.*
6) *Consistent: This alternative would enhance pedestrian activity along Santa Monica Boulevard to the same degree as the proposed project.*
7) *Consistent: This alternative would provide housing and retail near alternative means of transportation and would provide sufficient on-site parking.*
8) *Consistent: This alternative would develop a mixed-use project that can provide for an integrated urban design.*
9) *Consistent: This alternative would expand the City's economic base and provide commercial and retail activities.*

10) *Consistent: This alternative would include water and energy conservation measures consistent with the City's Green Building Ordinance.*

6.9 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-34 compares the physical impacts for each of the alternatives to the physical impacts of the proposed project. The No Project Alternative would be the overall environmentally superior alternative since it would avoid all project impacts. However, the No Project Alternative would not achieve the basic project objectives as stated in Section 2.0, *Project Description.*

Among the development options, Alternative 6 (Reduced Density on R4B Lots) and Alterative 7 (Modified Project) would be environmentally superior to the proposed project. Alternatives 6 and 7 would meet all the objectives of the proposed project.

These alternatives would have higher trip generation than the proposed project. However, they would also involve a modified access scheme to allow left turns in and out of the driveway on West Knoll Drive. This new access scheme would affect how trips are distributed on the local roadway network and reduce the number of trips through the intersection of Hancock Avenue and Holloway Drive, thus eliminating the significant and unavoidable impact at that intersection under future (2019) conditions in the PM peak hour. Therefore, these alternatives would improve traffic conditions and reduce traffic-related impacts compared to the proposed project.

Alternatives 6 and 7 would involve slightly higher air and GHG emissions, traffic noise, and wastewater generation than the proposed project. Nonetheless, these impacts would remain less than significant, the same as the proposed project. These alternatives would not avoid the significant and unavoidable construction noise impact. Operational noise impacts would be the same as the proposed project and would be less than significant.

Although Alternative 6 would provide three fewer affordable housing units than the proposed project, it would still contribute to the City's affordable housing stock and would also pay the City's affordable housing fees for the R4B portion of the site. Therefore, both Alternative 6 and Alternative 7 would be consistent with the General Plan goals to provide affordable housing and to develop the site with a mixed-use project. For both alternatives 6 and 7, impacts related to land use would be the same as the proposed project and would be less than significant.

Since Alternative 6 would not be granted density bonuses on the R4B portion of the site, that portion of the site would have a lower height (45 feet) compared to the proposed project (55 feet). Although the reduced height would not change any environmental impact conclusions (all land use and aesthetics impacts would be the same as the proposed project and would be less than significant), it may be more desirable for the surrounding residents.

Table 6-34
Summary Comparison of Proposed Project Alternatives

Issue Area	Proposed Project	No Project	Alternative 2: Existing Zoning	Alternative 3: Reduced Density	Alternative 4: Boutique Hotel	Alternative 5: No Subterranean Parking	Alternative 6: Reduced Density on R4B Lots	Alternative 7: Modified Project
Air Quality	Class III	- *(Class IV)*	- *(Class III)*	- *(Class III)*	+ *(Class III)*	- *(Class III)*	+ *(Class III)*	+ *(Class III)*
Geology and Hydrology	Class II	- *(Class IV)*	= *(Class II)*	= *(Class II)*	= *(Class II)*	- *(Class II)*	= *(Class II)*	= *(Class II)*
Greenhouse Gas Emissions	Class III	- *(Class IV)*	- *(Class III)*	- *(Class III)*	+ *(Class III)*	- *(Class III)*	+ *(Class III)*	+ *(Class III)*
Land Use and Planning	Class III	- *(Class IV)*	= *(Class III)*	= *(Class III)*	= *(Class III)*	+ *(Class I)*	= *(Class III)*	= *(Class III)*
Noise	Class I	- *(Class IV)*	- *(Class I)*	- *(Class I)*	- *(Class I)*	- *(Class I)*	+ *(Class I)*	+ *(Class I)*
Traffic	Class I	- *(Class IV)*	- *(Class I)*	- *(Class I)*	+ *(Class I)*	= *(Class I)*	- *(Class III)*	- *(Class III)*
Utilities and Service Systems	Class III	- *(Class IV)*	- *(Class III)*	- *(Class III)*	+ *(Class III)*	= *(Class III)*	+ *(Class III)*	+ *(Class III)*

Class I = significant and unavoidable impact
Class II = less than significant impact with mitigation incorporated
Class III = less than significant impact
Class IV = no impact
** Impact classifications are shown for the greatest impact in the issue area (i.e., if Class II and III impacts were identified in the issue area, the table indicates the overall impact in that issue area as Class II).*
- impact would be lower (better) than that of the proposed project
+ impact would be greater (worse) than that of the proposed project
= impact would be the same as the proposed project