V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Specifically, Public Resources Code (PRC) Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, "the purpose of an environmental impact report is… to identify alternatives to the project."

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

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

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are addressed. Other relevant provisions set forth in the CEQA Guidelines state that EIRs do not need to consider every conceivable alternative to a project, nor are they required to consider alternatives that are infeasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> *Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations,*

jurisdictional boundaries […], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site […] (or the site is already owned by the proponent).

However, no one of these factors establishes a fixed limit on the scope of reasonable alternatives. Beyond these factors, the CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

2. Project Objectives

As presented in Section II, Project Description, of this Draft EIR, the underlying purpose of the proposed Project is to maximize the development potential on the Project Site through the development of a high quality commercial project that revitalizes the site and provides a variety of uses, including a private membership club with guestrooms, restaurants, bars, lounge and dining spaces, screening rooms, a supper club, and a rooftop pool, along with publicly-accessible retail space, an art gallery, and creative office space. As set forth in the CEQA Guidelines, the proposed Project's specific objectives are as follows.

- Add to the diversity of visitor-serving uses available on the Sunset Strip.
- Provide a central location where creative and entrepreneurial patrons come together to meet, exchange ideas, dine, and participate in various cultural events.
- Develop a unique cultural use, which would contribute to the City's economy with an entertainment and creative arts-related venue that includes restaurants, bars, and hospitality uses.
- Enhance the pedestrian connections and activity along Sunset Boulevard through the development of an open and inviting building façade at the sidewalk level featuring a landscaped community plaza that engages the street and the neighborhood community.
- Maximize opportunities for a mix of retail, art gallery, creative offices, entertainment, hospitality, dining, bars, and guestrooms that would further the Sunset Specific Plan's goals to develop the area with a diversity of uses that support daytime and nighttime populations, along with goods and services for City residents.

- Contribute to and expand the diversity of iconic entertainment and cultural venues on the Sunset Strip.

- Support the community's vision of the Sunset Strip as a high-quality international entertainment destination.

- Add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment.

- Complement the diverse mix of architectural styles, building heights, and uses along Sunset Boulevard.

- Construct an energy-efficient and environmentally conscious building by incorporating sustainable elements of design, construction, and operation to achieve Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council or satisfy equivalent green building standards.

- Provide significant new creative office space to enhance the City's supply of modern office environments that cater to and respond to the existing and future needs of businesses that will support the economic future and vitality of the City.

- Maximize the number of new permanent jobs generated by the addition of new creative offices, restaurant and retail space, arts gallery and entertainment uses, bars, guestrooms, and fitness and spa facilities, helping to secure a strong and continuous tax base and supply the region with greater employment options.

- Revitalize an under-utilized commercial property in the heart of the Sunset Strip.

3. Overview of Selected Alternatives to the Proposed Project

The intent of the alternatives analysis is to identify feasible alternatives to a proposed project that reduce or eliminate a proposed project's potentially significant impacts. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the proposed Project would result in significant impacts that cannot be feasibly mitigated with regard to: (1) Project-level on-site noise and vibration impacts (associated with human annoyance) from on-site construction activities; (2) cumulative on-site noise impacts in the event the construction of Related Project No. 43, which is located immediately west of the Project Site, occurs simultaneously with Alternative 2 due to the presence of sensitive receptors immediately south of the Project Site and Related Project No. 43; (3) Project-level noise impacts when compared to existing conditions (rather than future conditions) due to off-site traffic along Hilldale Avenue south of Sunset Boulevard; and (4) cumulative noise impacts during operation due to off-site traffic along

Hilldale Avenue south of Sunset Boulevard. Accordingly, the following alternatives to the proposed Project have been selected for evaluation based on the significant environmental impacts of the proposed Project, the objectives established for the proposed Project (listed above), the feasibility of the alternatives considered, the likelihood of the alternatives to avoid or substantially lessen one or more of the potentially significant impacts, the compatibility of the alternative with surrounding land uses, public input received during the scoping period, and the existing zoning designation on the Project Site:

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Reduced Density/8-Story Alternative
- Alternative 3: Reduced Density/7-Story Alternative
- Alternative 4: Office/3-Story Alternative

Each of these alternatives is described and evaluated in Sections V.A through V.D below.

4. Alternatives Considered and Rejected

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

In addition to the four alternatives identified above, the alternatives to the proposed Project that have been considered and rejected as infeasible include the following:

- **Alternatives to Eliminate Significant Noise and Vibration Impacts During Construction:** Alternatives were considered to eliminate the significant and unavoidable impacts related to on-site construction noise impacts (both Project-level and cumulative conditions) and on-site construction vibration impacts (related to human annoyance). As discussed in Section IV.H, Noise, of this Draft EIR, even with implementation of mitigation measures, significant noise and vibration impacts would occur during Project construction for limited durations from the operation of construction equipment and haul trucks. Based on the thresholds upon which the construction noise and vibration analysis is based, reducing construction-related noise and vibration impacts to a less-than-significant level would require that no substantial construction activities of any kind (i.e., involving earthmoving equipment) occur on the Project Site. More

specifically, the Project Site is an infill site with residential uses immediately adjacent to the south. As a result, significant construction noise and vibration impacts at this residential receptor would be expected to occur with any development scenario on the Project Site that involves demolition of existing structures and grading and excavation to support new development. This is because the construction activities that would be needed to grade and excavate the Project Site are inherently intermittently disturbing in the areas of noise and vibration. As discussed in detail in Section IV.H, Noise, of this Draft EIR, implementation of Mitigation Measure H-1 requiring the implementation of a sound barrier would reduce the construction noise levels from the Project Site to the extent feasible. However, the noise levels would continue to exceed the significance thresholds due to the proximity of existing residential uses. Furthermore, as discussed in Section IV.H, Noise, of this Draft EIR, additional mitigation measures were considered to reduce vibration impacts from on-site construction activities with respect to human annoyance, but such measures were determined to result in their own independent impacts and were rejected as infeasible. .

Based on the foregoing and the analysis in Section IV.H Noise, of this Draft EIR, reducing temporary construction noise and vibration impacts below a level of significance at adjacent residential uses has been determined to be technologically infeasible. Furthermore, it should be noted that any reduction in the intensity of construction activities on an hourly or daily basis would actually increase the overall duration of the construction period and thus prolong potentially significant noise and vibration impacts over time. Therefore, alternatives to eliminate the proposed Project's short-term noise and vibration impacts during construction were rejected as infeasible.

- **Alternate Site**: State CEQA Guidelines Section 15126.6(f)(2) provides guidance regarding consideration of one or more alternative location(s) for a proposed project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened; and if no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

  Development of the proposed Project at an alternate off-site location would not be consistent with the purpose and objectives of the proposed Project. The underlying purpose of the proposed Project is to maximize the development potential on the Project Site through the development of a high quality commercial project that revitalizes the site and provides a variety of uses, including a private membership club with guestrooms, restaurants, bars, lounge and dining spaces, screening rooms, a supper club, and a rooftop pool, along with publicly-accessible retail space, an art gallery, and creative office space. Some of the primary objectives of the proposed Project specific to its location are to: (1) add to the diversity of visitor-service uses available on the Sunset Strip; (2) enhance the pedestrian connections and activity along Sunset Boulevard;

(3) contribute to and expand the diversity of iconic entertainment and cultural venues on the Sunset Strip; (4) support the community's vision of the Sunset Strip as a high-quality international entertainment destination; (5) add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment; and (6) complement the diverse mix of architectural styles, building heights, and uses along Sunset Boulevard. As such, the proposed Project is focused on the development of a particular underutilized site, which is under the ownership of the Project Applicant. In addition, given the built-out nature of the City of West Hollywood (City), no equivalent and available alternate site exists. This is especially true for any alternative site located on the Sunset Strip near existing entertainment and cultural venues that could reasonably be acquired by the Applicant from a willing seller. Even if an alternate site on the Sunset Strip that could accommodate the proposed Project could be found, it would be expected that the significant and unavoidable impacts associated with construction noise and vibration due to construction would also occur due to the proximity of residences to the south.[1] Additionally, development of the proposed Project at an alternate site could potentially produce other environmental impacts (considering the mixes of uses in the West Hollywood area) that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the proposed Project. Therefore, an alternate site is considered unreasonable and infeasible as no suitable alternate site in the general vicinity of the Project Site on the Sunset Strip has been identified, the Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the proposed Project, and an alternate site would not likely avoid the proposed Project's significant impacts. Therefore, this alternative was rejected from further consideration.

5. Analysis Format

In accordance with state CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less than, similar to, or greater than the corresponding impacts of the proposed Project. Furthermore, each alternative is evaluated to determine whether the proposed Project objectives identified in Section II, Project Description, of this Draft EIR would be

[1] *Note that the Sunset Time Draft EIR (July 2009) and the Sunset Doheny Hotel EIR (March 2010), which analyzed the environmental impacts of projects located on the Sunset Strip in the City of West Hollywood, came to the same conclusion with respect to the noise and vibration impacts that would result from construction activities on surrounding sensitive receptors and concluded that they would be significant and unavoidable.*

substantially attained by the alternative.[2] The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR, and where applicable, a discussion of the mitigation measures and project design and environmentally sustainability features identified in Section IV, Environmental Impact Analysis, of this Draft EIR that would be applied to the various alternatives.[3]

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the proposed Project are compared for each environmental issue area as follows:

   - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the proposed Project, the comparative impact is said to be "less."

   - Greater: Where the alternative's net impact would be clearly more adverse or less beneficial than the impact of the proposed Project, the comparative impact is said to be "greater."

   - Similar: Where the impacts of the alternative and the proposed Project would be roughly equivalent, the comparative impact is said to be "similar."

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic proposed Project objectives would be feasibly and substantially attained by the alternative.

Table V-1 on page V-8 provides a summary matrix that compares the impacts associated with the proposed Project with the impacts of each of the analyzed alternatives.

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[2] *CEQA Guidelines Section 15126.6(c).*

[3] *The analysis assumes similar mitigation measures would be required for the corresponding significant impacts of the alternatives evaluated in this section.*

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

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Density/8-Story Alternative	Alternative 3: Reduced Density/ 7-Story Alternative	Alternative 4: Office/3-Story Alternative
A. AESTHETICS, VIEWS, LIGHT/GLARE, AND SHADING					
Aesthetics and Visual Quality					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Views	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Light/Glare					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Shading	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
B. AIR QUALITY					
Construction					
Regional Emissions	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Density/8-Story Alternative	Alternative 3: Reduced Density/ 7-Story Alternative	Alternative 4: Office/3-Story Alternative
Localized Emissions	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation					
Regional Emissions	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Localized Emissions	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (No Impact)
Toxic Air Contaminants	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
C. GEOLOGY AND SOILS					
Geology and Soils	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
D. GREENHOUSE GAS EMISSIONS					
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Density/8-Story Alternative	Alternative 3: Reduced Density/ 7-Story Alternative	Alternative 4: Office/3-Story Alternative
E. HAZARDS AND HAZARDOUS MATERIALS					
Hazards and Hazardous Materials	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
F. HYDROLOGY AND WATER QUALITY					
Surface Water Hydrology					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Similar or Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Surface Water Quality					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Similar or Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Groundwater Hydrology					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Similar or Greater (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Density/8-Story Alternative	Alternative 3: Reduced Density/ 7-Story Alternative	Alternative 4: Office/3-Story Alternative
Groundwater Quality					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
G. LAND USE					
Land Use Consistency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Land Use Compatibility	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
H. NOISE					
Construction					
On-Site Noise (Project-Level and Cumulative)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Off-Site Noise	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
On-Site Vibration (Building Damage)	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)

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

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Density/8-Story Alternative	Alternative 3: Reduced Density/ 7-Story Alternative	Alternative 4: Office/3-Story Alternative
On-Site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation					
On-Site Noise	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Off-Site Noise (Project-Level under Existing conditions)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Less Than Significant)
Off-Site Noise (Project-Level under Future conditions)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (No Impact)
Off-Site Noise (Cumulative)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Less (Significant and Unavoidable but Alternative contribution is not cumulatively considerable)
I.1. PUBLIC SERVICES—POLICE PROTECTION					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Density/8-Story Alternative	Alternative 3: Reduced Density/ 7-Story Alternative	Alternative 4: Office/3-Story Alternative
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
I.2. PUBLIC SERVICES—FIRE PROTECTION					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
J. TRAFFIC, ACCESS, AND PARKING					
Construction					
Intersection Level of Service	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Bicycle Facilities, Pedestrian Facilities, and Public Transit	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation					
Intersection Level of Service	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (No Impact)
CMP Intersections	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (No Impact)

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

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Density/8-Story Alternative	Alternative 3: Reduced Density/ 7-Story Alternative	Alternative 4: Office/3-Story Alternative
CMP Freeway Segments	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (No Impact)
Regional Transit	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (No Impact)
Bicycle Facilities, Pedestrian Facilities, and Public Transit	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Parking	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
K.1. UTILITIES AND SERVICE SYSTEMS—WATER SUPPLY AND INFRASTRUCTURE					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
K.2. UTILITIES AND SERVICE SYSTEMS—WASTEWATER					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Environmental Issue	Proposed Project	Alternative 1: No Project/ No Build Alternative	Alternative 2: Reduced Density/8-Story Alternative	Alternative 3: Reduced Density/ 7-Story Alternative	Alternative 4: Office/3-Story Alternative
K.1. UTILITIES AND SERVICE SYSTEMS—SOLID WASTE					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
K.1. UTILITIES AND SERVICE SYSTEMS—ENERGY					
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which a proposed project does not proceed. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part, that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the proposed Project would not be approved, no new development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would generally remain as they were at the issuance of the Notice of Preparation. Under Alternative 1, the existing commercial uses would continue to operate on the Project Site, and no new construction or building expansion would occur. Furthermore, no changes to the existing on-site parking or access would occur.

2. Environmental Impact Analysis

a. Aesthetics, Views, Light and Glare, and Shading

Section 21099(d)(1) of the Public Resources Code (SB 743) states that aesthetic impacts of a residential, multi-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. The proposed Project is an employment center project located on an infill site within a transit priority area. Therefore, pursuant to Public Resources Code Section 21099(d)(1), the aesthetic impacts on the environment of the proposed Project would not be considered significant. However, an analysis of the proposed Project's aesthetic impacts was prepared for informational purposes, and an analysis of the aesthetic impacts of Alternative 1 in comparison to the proposed Project is also provided for informational purposes below.

(1) Aesthetics/Visual Quality

(a) Construction

As no development would occur under Alternative 1, there would be no potential for construction activities to temporarily alter the visual appearance of the Project Site.

Accordingly, no temporary aesthetics impacts associated with construction activities would occur under Alternative 1. Thus, because there would be no aesthetic impacts under the No Project/No Build Alternative during construction as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(b) Operation

The No Project/No Build Alternative would not remove the existing commercial uses and parking on the Project Site or construct a new building on the Project Site. Accordingly, Alternative 1 would not change the existing visual character of the Project Site. However, Alternative 1 would not provide the enhanced landscaping proposed by the Project or the other architectural features, which would enhance aesthetics and visual quality in the vicinity of the Project Site if implemented. The proposed Project would positively contribute to the visual character of the Project Site from adjacent streets, including Sunset Boulevard. Therefore, the beneficial effects that would result from the proposed Project's would not be realized under Alternative 1. Accordingly, the impacts of Alternative 1 would be similar to the less-than-significant impacts of the proposed Project.

(2) Views

Under the No Project/No Build Alternative, the existing commercial uses and parking would remain on-site, and the Project's proposed building would not be developed. As such, Alternative 1 would not result in an increase in the height or massing of the on-site structure, and existing views of, and across, the Project Site would remain. Since there are no public view resources or valued resources located on the Project Site or in the immediate vicinity of the Project Site and none were identified that could be affected by the proposed Project, as described in Section IV.A, Aesthetics, of this Draft EIR, similarly, Alternative 1 would not affect any public views or view resources. Thus, because there would be no impacts related to views under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(3) Light and Glare

(a) Construction

The No Project/No Build Alternative would not involve the construction of any new development on-site. Accordingly, Alternative 1 would not introduce light sources associated with construction equipment or materials with the potential to cause glare. As such, because there would be no impacts related to light and glare under the No Project/No Build Alternative as compared to the temporary less-than-significant impacts under the

proposed Project, impacts under Alternative 1 during construction would be less than those of the proposed Project.

(b) Operation

Alternative 1 would not alter or expand the existing uses on the Project Site or introduce any new sources of light or glare. Accordingly, the No Project/No Build Alternative would not change the existing lighting environment on the Project Site. During Project operation, because there would be no impacts related to light and glare under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(4) Shading

The No Project/No Build Alternative would not construct new buildings or increase existing building heights on the Project Site. Thus, Alternative 1 would not create or cast new shadows on surrounding shade-sensitive uses. While the existing commercial building and street trees currently generate shadows surrounding the Project Site, they do not generate significant shadows on surrounding sensitive uses. Therefore, because there would be no significant shading of sensitive uses under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, shading under Alternative 1 would be less than those of the proposed Project.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not alter the existing on-site commercial uses and parking or result in new construction. Accordingly, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment, and construction-related regional and localized air quality impacts would not occur. Therefore, no construction-related regional and localized air quality impacts would occur under Alternative 1. As such, because there would be no impacts associated with construction emissions under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(b) Toxic Air Contaminants

As no construction activities would occur, the No Project/No Build Alternative would not result in diesel particulate emissions that could generate substantial toxic air contaminants (TACs). Therefore, no construction impacts associated with TACs would occur under the No Project/No Build Alternative. As such, because there would be no construction impacts associated with TACs under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 during construction would be less than those of the proposed Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not result in new development that could generate new operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing uses on-site. Therefore, no operational air quality impacts would occur under Alternative 1. Thus, because there would be no impacts associated with regional and localized emissions under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 during operation would be less than those of the proposed Project.

(b) Toxic Air Contaminants

The No Project/No Build Alternative would not result in new development or increased operations on-site, no new increase in mobile source emissions would occur. Therefore, no operational impacts associated with TACs would occur under the No Project/No Build Alternative. Thus, because there would be no operational impacts associated with TACs under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

c. Geology and Soils

The Project Site is located within the seismically active region of Southern California; thus, as with the proposed Project, Alternative 1 would be exposed to certain site-specific geologic hazards. However, as no new development would be introduced to the Project Site under the No Project/No Build Alternative, and no grading or other earthwork activities would occur, this alternative would not cause or accelerate geologic hazards related to fault rupture, seismic hazards, liquefaction, soil erosion, lateral spreading, subsidence, soil stability, or expansive soils, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. Therefore, no impacts related

to geology and soils would occur under Alternative 1. As such, because the No Project/No Build Alternative would avoid the significant impacts (prior to mitigation) of the proposed Project associated with seismic ground shaking, liquefaction, seismically induced settlement, and lateral spreading and collapse, impacts would be less than those of the proposed Project.

d. Greenhouse Gas Emissions

As there would be no new development or operations on-site, no new greenhouse gas (GHG) emissions would occur under the No Project/No Build Alternative. As such, no impacts associated with GHG emissions and climate change would occur under Alternative 1. Therefore, because there would be no impacts related to GHG emissions and climate change under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

e. Hazards and Hazardous Materials

No grading or other earthwork activities would occur under the No Project/No Build Alternative. Accordingly, there would be no potential for new or increased use of hazardous materials, generation of hazardous waste, or uncovering of subsurface hazards. In addition, with no new permanent development, there would be no impacts related to oil wells or methane gas, and no impacts related to the implementation of any emergency response or evacuation plans. Therefore, no impacts related to hazards and hazardous materials would occur under Alternative 1. Thus, because there would be no impacts related to hazards and hazardous materials under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

f. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

As no new development would occur, Alternative 1 would not have the potential to temporarily alter existing surface drainage patterns and flows. Accordingly, no impacts to surface water hydrology during construction would occur. Therefore, because there would be no construction impacts related to surface water hydrology under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and existing development would remain. Accordingly, this alternative would not alter the amount of pervious surfaces on the Project Site, and no modifications to the existing drainage patterns or increase in the volume of runoff generated from the Project Site would occur. Thus, no impacts to surface water hydrology during operation would occur under Alternative 1. However, the amount of impervious surfaces under Alternative 1 would be greater when compared to the proposed Project since Alternative 1 would not introduce any new landscaped areas to the Project Site. In addition, Alternative 1 would not implement the Low Impact Development (LID) Best Management Practices (BMPs) proposed by the proposed Project in order to further reduce the volume of water leaving the Project Site and improve surface water quality runoff. Therefore, operational impacts related to surface water hydrology under the No Project/No Build Alternative would be similar to or greater than those under the proposed Project but would be less than significant.

(2) Surface Water Quality

(a) Construction

As no new development would occur, Alternative 1 would not have the potential to contribute to pollutant loading in stormwater runoff. Accordingly, no impacts to surface water quality during construction would occur under Alternative 1. Therefore, because there would be no construction impacts related to surface water quality under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and existing development would remain. Accordingly, this alternative would not alter the amount of pervious surfaces on the Project Site, and no modifications to the existing drainage patterns or increase in the volume of runoff generated from the Project Site would occur. However, Alternative 1 would not implement the LID BMPs proposed under the proposed Project to reduce the quantity or improve the quality of stormwater runoff from the overall Project Site. Therefore, impacts to surface water quality during operation under Alternative 1 would be similar to or greater than the proposed Project but would be less than significant.

(3) Groundwater Hydrology

(a) Construction

No grading or excavation would occur under Alternative 1. Accordingly, there would be no potential to encounter groundwater beneath the Project Site, and no new dewatering associated with construction would be necessary. No impacts to groundwater hydrology during construction would occur under Alternative 1. Therefore, because there would be no construction impacts related to groundwater hydrology under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and no increase or decrease in the imperviousness of the Project Site would occur that could affect groundwater recharge rates on-site. Furthermore, groundwater would not be encountered under this alternative. No impacts to groundwater hydrology during operation would occur under Alternative 1. However, the amount of impervious surfaces under Alternative 1 would be greater when compared to the proposed Project since Alternative 1 would not introduce any new landscaped areas to the Project Site. In addition, Alternative 1 would not implement the LID BMPs proposed by the proposed Project in order to further reduce the volume of water leaving the Project Site and improve surface water quality runoff. Therefore, operational impacts related to groundwater hydrology under the No Project/No Build Alternative would be similar to or greater than those under the proposed Project, but would be less than significant.

(4) Groundwater Quality

(a) Construction

No grading or excavation would occur under Alternative 1. Accordingly, there would be no potential to increase groundwater contamination or cause regulatory water quality standards at an existing production well to be violated. No impacts to groundwater quality during construction would occur under Alternative 1. Therefore, because there would be no construction impacts related to groundwater quality under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(b) Operation

Under Alternative 1, no new permanent development would occur, and no increased use of potentially hazardous materials would occur. Accordingly, there would be no

potential for Alternative 1 to release contaminants into the groundwater that could affect existing groundwater quality, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. No impacts to groundwater quality during operation would occur under Alternative 1. Therefore, because there would be no operational impacts related to groundwater quality under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

g. Land Use

Under the No Project/No Build Alternative, there would be no changes to the physical or operational characteristics of the existing on-site commercial uses and parking. No land use approvals or permits would be required. Accordingly, Alternative 1 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site. No new impacts associated with consistency with land use regulations and plans would occur. Therefore, because there would be no new impacts related to consistency with land use regulations and plans under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

With regard to land use compatibility, the No Project/No Build Alternative would not introduce new land uses or development to the Project Site. Thus, Alternative 1 would not affect existing on-site or off-site land uses, and existing land use relationships would remain. However, the No Project/No Build Alternative would not further certain goals and policies under the General Plan and the Sunset Specific Plan (SSP) that would be served by the proposed Project, such as those related to promoting Sunset Boulevard as a regional, national, and international destination, supporting and encouraging arts and culture in West Hollywood, and maximizing iconic urban design values. Nonetheless, the No Project/No Build alternative would have no impact on the environment, and impacts under Alternative 1 would be less than those of the proposed Project.

h. Noise

(1) Construction

No construction activities would occur under the No Project/No Build Alternative. Accordingly, no construction-related noise or vibration impacts would be generated on-site or off-site. Therefore, because the No Project/No Build Alternative would avoid the significant construction impacts of the proposed Project associated with on-site noise and vibration (related to threshold for human annoyance), impacts would be less than those of the proposed Project.

(2) Operation

Under the No Project/No Build Alternative, no new development or uses would be introduced to the Project Site, and no changes to existing site operations would occur. Accordingly, no new stationary or mobile noise sources would be introduced to the Project Site or its vicinity. No impacts associated with operational noise would occur under Alternative 1. Therefore, because: (1) there would be no Project-level impacts related to operational noise (related to on-site and off-site noise sources, including mechanical equipment, outdoor areas parking facility and off-site traffic) as compared to the those under the proposed Project; and (2) the No Project/No Build Alternative would avoid the significant Project-level (under Existing Plus Project conditions) and cumulative impacts of the proposed Project related to off-site noise source (e.g., off-site traffic), impacts under Alternative 1 would be less than those of the proposed Project.

i. Public Services

(1) Police Protection

(a) Construction

As Alternative 1 would not require construction, there is no potential for construction activities to create sources of nuisance and hazards that would potentially impact police response times in the vicinity of the Project Site. Accordingly, Alternative 1 would not result in any police protection impacts due to construction. No construction-related police protection impacts would occur under this alternative. Therefore, because there would be no construction impacts related to police projection services under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Accordingly, there would be no potential to increase the service population on-site or have the potential to increase calls for police protection services from the Los Angeles County Sheriff's Department. No impacts to police protection services would occur under Alternative 1. Therefore, because there would be no operational impacts related to police protection services under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(2) Fire Protection

(a) Construction

As Alternative 1 would not require construction, there is no potential for construction activities to expose people to the risk of fire or explosion related to the use of hazardous materials or to potentially impact the provision of fire protection services in the vicinity of the Project Site. No construction-related fire protection impacts would occur under this alternative. Therefore, because there would be no construction impacts related to fire protection services under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Accordingly, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles County Fire Department (LACFD) stations that would serve the Project Site. No impacts to fire protection and emergency services would occur under Alternative 1. Therefore, because there would be no operational impacts related to fire protection services under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

j. Traffic, Access, and Parking

(1) Construction

Since the No Project/No Build Alternative would not include new uses or the development of new buildings, no construction activities would occur on the Project Site. Accordingly, Alternative 1 would not generate vehicle trips associated with heavy-duty construction equipment, haul trucks, or construction worker vehicles. As such, no construction-related traffic impacts would occur under this alternative. In addition, as construction activities would not occur under this alternative, there would be no potential for access and safety, bus/transit, and on-street parking impacts during construction. Therefore, because there would be no such construction-related impacts under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(2) Operation

The No Project/No Build Alternative would not generate any additional vehicle trips or alter existing access or circulation within the Project Site since the No Project/No Build alternative would not develop new or additional land uses on the Project Site. Accordingly, no impacts would occur with respect to operational traffic, including intersection levels of service; regional transportation system; access and circulation; bicycle, pedestrian, and vehicular safety; public transit, and parking. Therefore, because there would be no such operational impacts under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

The No Project/No Build Alternative would not alter the existing on-site commercial uses and parking uses or result in new construction. Accordingly, no construction-related or operational impacts to water supply and infrastructure would occur under this alternative. Therefore, because there would be no impacts related to water supply and infrastructure under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(2) Wastewater

The No Project/No Build Alternative would not alter the existing on-site commercial uses and parking or result in new construction. Accordingly, there would be no construction-related impacts to wastewater conveyance and treatment infrastructure or increase in the Project Site's wastewater flow. Therefore, because there would be no impacts related to wastewater conveyance and treatment under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(3) Solid Waste

The No Project/No Build Alternative would not alter the existing on-site commercial uses and parking or result in new construction. Accordingly, there would be no construction-related impacts to solid waste facilities or increase in the Project Site's operational solid waste production. Therefore, because there would be no impacts related to solid waste collection and disposal facilities under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

(4) Energy

The No Project/No Build Alternative would not alter the existing on-site commercial uses and parking or result in new construction. Accordingly, there would be no construction-related impacts to energy use or increase in the Project Site's electricity, natural gas, or petroleum-based fuel usage. Therefore, because there would be no impacts related to energy resources under the No Project/No Build Alternative as compared to the less-than-significant impacts under the proposed Project, impacts under Alternative 1 would be less than those of the proposed Project.

3. Comparison of Impacts

Alternative 1 would avoid the proposed Project's significant environmental impacts related to on-site noise and on-site and off-site vibration impacts during construction and its operational off-site mobile source noise impacts. As no changes to the existing conditions would occur, Alternative 1 would also eliminate the proposed Project's remaining impacts that are already less-than-significant or less-than-significant with mitigation (i.e., geology and soils). However, impacts to surface water quality, surface water hydrology, and groundwater hydrology would be greater than the Project although still less than significant.

4. Relationship of the Alternative to Project Objectives

No new development would be introduced on the Project Site under Alternative 1, and no changes to existing land uses or operations on-site would occur under Alternative 1. As such, the No Project/No Build Alternative would not meet any of the Project objectives. Specifically, Alternative 1 would not meet the following Project objectives:

- Add to the diversity of visitor-serving uses available on the Sunset Strip.
- Provide a central location where creative and entrepreneurial patrons come together to meet, exchange ideas, dine, and participate in various cultural events.
- Develop a unique cultural use, which would contribute to the City's economy with an entertainment and creative arts-related venue that includes restaurants, bars, and hospitality uses.
- Enhance the pedestrian connections and activity along Sunset Boulevard through the development of an open and inviting building façade at the sidewalk level featuring a landscaped community plaza that engages the street and the neighborhood community.

- Maximize opportunities for a mix of retail, art gallery, creative offices, entertainment, hospitality, dining, bars, and guestrooms that would further the Sunset Specific Plan's goals to develop the area with a diversity of uses that support daytime and nighttime populations, along with goods and services for City residents.

- Contribute to and expand the diversity of iconic entertainment and cultural venues on the Sunset Strip.

- Support the community's vision of the Sunset strip as a high-quality international entertainment destination.

- Add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment.

- Complement the diverse mix of architectural styles, building heights, and uses along Sunset Boulevard.

- Construct an energy-efficient and environmentally conscious building by incorporating sustainable elements of design, construction, and operation to achieve Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council or satisfy equivalent green building standards.

- Provide significant new creative office space to enhance the City's supply of modern office environments that cater to and respond to the existing and future needs of businesses that will support the economic future and vitality of the City.

- Maximize the number of new permanent jobs generated by the addition of new creative offices, restaurant and retail space, arts gallery and entertainment uses, bars, guestrooms, and fitness and spa facilities, helping to secure a strong and continuous tax base and supply the region with greater employment options.

- Revitalize an under-utilized commercial property in the heart of the Sunset Strip.

Overall, Alternative 1 would not meet any of the Project objectives or the proposed Project's underlying purpose to maximize the development potential on the Project Site through the development of a high quality commercial project that revitalizes the site and provides a variety of uses, including a private membership club with guestrooms, restaurants, bars, lounge and dining spaces, screening rooms, a supper club, and a rooftop pool, along with publicly-accessible retail space, an art gallery, and creative office space.

V. Alternatives

B. Alternative 2: Reduced Density/8-Story Alternative

1. Description of the Alternative

The Reduced Density/8-Story Alternative would include the development of a multi-use, eight-story building on the Project Site through amendments to the General Plan, Sunset Specific Plan (SSP), and zoning designations to allow for additional height, density, and land uses. As with the proposed Project, this alternative would also require associated requests for approval of demolition, development, administrative, and conditional use permits. As shown in Figure V-1 on page V-30, Alternative 2 would include the development of a multi-use, eight-story building on the Project Site. The new building would be placed within the same building footprint as the proposed Project and would include the same overall design features and architecture.

Similar to the proposed Project, Alternative 2 would include retail and gallery uses on the ground floor, creative office space on the second to fourth floors, Arts Club space on a total of four above-ground floors and within one subterranean level, and a rooftop pool deck terrace with an emergency helipad. Table V-2 on page V-31 compares the proposed uses under Alternative 2 with the proposed Project. As shown in the table, Alternative 2 would include the same uses as the proposed Project. Ground level and rooftop space would be the same as for the proposed Project. However, Alternative 2 would reduce the overall square footage of the Arts Club by relocating one of the floors dedicated to its use to one of the subterranean levels. More specifically, the 16,137 square feet of Arts Club uses proposed for Level 5, as shown in Table II-1 in Section II, Project Description, of this Draft EIR, consisting of fitness center/spa, screening rooms, holding bar and support area under the proposed Project, would be relocated under Alternative 2 to a mezzanine level within Level B2, consisting of 15,742 square feet of subterranean Arts Club space, which could be sufficiently accommodated within the existing space and height capacity of Level B2. As a result, Alternative 2 would remove one level of Arts Club space from the aboveground levels and relocate it to the second subterranean level, providing a total of six below grade levels with a below grade mezzanine level. The overall number of underground parking levels within the parking structure would not change and the number of parking spaces provided would be the same as the proposed Project. In addition, this re-configuration in design would not require any expansion of the overall size or depth of the underground parking structure proposed by the proposed Project.

Figure V-1
Alternative 2 (Reduced Density/8-Story Alternative)
Conceptual Rendering

Source: Gensler, 2016.

Table V-2
Summary of Alternative 2 (Reduced Density/8-Story Alternative) Uses and Comparison to the Proposed Project

Land Use	Alternative 2	Proposed Project	Difference
Gross Floor Area (FAR)	≈116,000 sf	≈132,000 sf	≈-16,000 sf
Floor Area Ratio	5.7	6.5	-1.2
Arts Club	46,831 sf	62,968 sf	–16,137 sf[a]
Arts Club Guestrooms	15	15	0
Retail Area	6,853 sf	6,853 sf	0
Art Gallery	2,192 sf	2,192 sf	0
Office	37,900 sf	37,900 sf	0
Pool Terrace (Non-FAR)	6,730 sf	6,730 sf	0
Maximum Building Height	127 ft	141 ft	-14 ft
Number of Parking Spaces	354	354	0
Number of Above-Grade Stories	8	9	-1
Number of Below-Grade Levels	6 and a mezzanine	6	1

sf = square feet

ft = feet

a Note that the 16,137 sf of Arts Club uses that is shown here as removed would actually be relocated within a mezzanine level within subterranean Level B2 of the parking structure and, thus, would be retained. The square footage of the new mezzanine level within the subterranean parking structure would be 15,742 sf. The number of Arts Club members and employees is not expected to change as a result of this reconfiguration in design. Therefore, a conservative analysis of environmental impacts for Alternative 2 would not take account for a reduction in square footage.

Source: Gensler, 2017.

Alternative 2 would reduce the proposed Project's nine-story, 141-foot tall building to an eight-story building with a maximum height of 127 feet (measured from the lowest point along Sunset Boulevard). Since Alternative 2 would relocate one of the proposed Project's floor levels underground, Alternative 2 would reduce the proposed Project's FAR of 6.5 to 5.7 but would still require an amendment to the SSP's allowable base FAR of 1.5 for the Project Site.[4]

Under Alternative 2, all elements and project design features of the proposed Project, including the building design, landscaped community plaza on the ground level, site access and parking, lighting and signage, security features, and environmental

[4] *Floor area located within a basement or underground level of a building is not included in the calculation of FAR under the West Hollywood Municipal Code (WHMC). (See Section 19.90.020.)*

sustainability features would remain the same. In addition, Alternative 2 would be designed to achieve 90 points on the City's Green Points System.

As with the proposed Project, construction of Alternative 2 would commence with demolition of the existing building structures, surface parking lot, and subterranean parking, followed by grading and excavation for the subterranean parking garage for Alternative 2. Although Alternative 2 would include a subterranean mezzanine level, the estimated depth of excavation expected for the subterranean levels and building foundations would be the same as the proposed Project at approximately 79 feet below grade.[5] Therefore, as with the proposed Project, it is estimated that approximately 48,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase under Alternative 2. However, the expected buildout date for Alternative 2 would be in 2020, which is the same as the proposed Project.

2. Environmental Impact Analysis

a. Aesthetics, Views, Light and Glare, and Shading

Senate Bill (SB) 743, effective January 1, 2014, amended CEQA and changed the way in which environmental impacts related to aesthetics are addressed in an EIR. Section 21099(d)(1) of the Public Resources Code (PRC) states that the "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." Similar to the proposed Project, as an employment center project located in a TPA, this alternative's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Therefore, the following analysis regarding aesthetics, visual character, views, light and glare, and shading is provided for informational purposes only.

(1) Aesthetics/Visual Quality

(a) Construction

Similar to the proposed Project, Alternative 2 would temporarily alter the visual appearance of the Project Site due to the removal of the existing building and surface

[5] *Level B2 of the proposed Project is proposed to be double-height in order to accommodate potential equipment for the automated parking structures lift mechanisms. There would be sufficient height in the remainder of Level B2 where the lift mechanisms are not located to accommodate the mezzanine level proposed under Alternative 2.*

parking lot. Other construction activities, including site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures would also alter the visual character and quality of the Project Site and adjacent roadways. These construction activities could be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. However, Alternative 2 would incorporate the same project design features as the proposed Project during construction, including the installation of temporary construction fencing along the periphery of the Project Site that would screen much of the construction activity from view at street level. In addition, any pedestrian walkways and construction fencing accessible to the public would be monitored for graffiti removal throughout the construction period. Overall, similar to the proposed Project, while Alternative 2 would alter the visual character of the Project area on a short-term basis, construction activities would not substantially alter or degrade the existing visual character of the Project Site. Therefore, similar to the proposed Project, impacts related to aesthetics during construction of Alternative 2 would be less than significant.

(b) Operation

Similar to the proposed Project, Alternative 2 would replace the existing two-story low-rise commercial building and surface parking lot on the Project Site with an eight-story multi-use building, thereby altering the visual character of the Project Site. Similar to the proposed Project, Alternative 2 would feature an iconic building design that would add to the eclectic urban environment of the Sunset Strip, where the City also envisions increases in density and height of new development. As with the proposed Project, Alternative 2 would increase the density and height of the development on the Project Site but would be compatible with existing and planned development in the area. Furthermore, similar to the proposed Project, Alternative 2 would be designed with the top two floors stepping down from Sunset Boulevard and with outdoor terraces incorporated on the middle floors to reduce the perceived bulk and mass of the proposed building in addition to having one less above-ground story than the proposed Project. The ground floor of this alternative would also incorporate visually and physically penetrable treatments along the Sunset Boulevard and Hilldale Avenue frontages that feature extensive windows to encourage pedestrian activities and create a human-scale frontage design. Accordingly, similar to the proposed Project, while development of this alternative would alter the visual character of the Project Site, the proposed building under Alternative 2 would not substantially degrade the existing visual character and quality of the Project Site and its surroundings or introduce elements that generate substantial long-term contrast with or substantially detract from the visual character of Sunset Boulevard and the western portion of the Sunset Strip. Therefore, similar to the proposed Project, implementation of Alternative 2 would result in a less-than-significant impact related to aesthetics and visual quality.

(2) Views

Similar to the proposed Project, the introduction of the proposed building under Alternative 2 would result in changes to short-range views of the Project Site. Due to the height and mass of the eight-story building under Alternative 2, changes to short-range views, particularly along the immediately adjacent roadways (i.e., Sunset Boulevard and Hilldale Avenue), would be more substantial than changes to long-range views. Despite having one less story than the proposed Project, this alternative would also be highly visible and would be substantially taller and have more massing than the existing two-story building on the Project Site.

However, as with the proposed Project, long-range views of identified visual resources or scenic vistas would not be affected by the development under Alternative 2 since having one less story than the proposed Project would not be noticeably different when viewed from long-range vantage points. There are no scenic resources located on the Project Site or in the immediate vicinity of the Project Site. Therefore, similar to the proposed Project, Alternative 2 would not damage or obstruct views of scenic vistas, and impacts to views would be less than significant.

(3) Light and Glare

(a) Construction

Similar to the proposed Project, construction of Alternative 2 would include the same uses as the proposed Project and would be developed in a similar manner as with the proposed Project. Therefore, it would introduce new, temporary sources of light and glare to the Project Site. As with the proposed Project, while the majority of construction would occur during daylight hours, there is a potential that construction could occur in the early evening hours within the permitted hours of construction and require the use of artificial lighting. However, Alternative 2 would incorporate similar project design features as the proposed Project, including the use of construction lighting that would be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. To the extent early evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction activities. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with WHMC light intensity requirements (Section 19.20.100). Therefore, similar to the proposed Project, with adherence to existing WHMC regulations and project design features, light resulting from construction activities would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

In addition, as with the proposed Project, any glare generated from the Project Site during construction would be highly transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. Furthermore, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the proposed Project, light and glare associated with the construction of Alternative 2 would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area, and impacts would be less than significant.

(b) Operation

Similar to the proposed Project, Alternative 2 would increase lighting levels within the Project Site and the surrounding area through the introduction of new sources of artificial lighting, including low-level exterior lights adjacent to the proposed building for security and wayfinding purposes; low-level accent lighting to highlight architectural features, landscape elements, and signage. As with the proposed Project, Alternative 2 proposes a lighting scheme that would utilize low-glare fixtures to provide soft, low-level functional lighting at the building entrance and ramp area and result in minimal lighting influence to all areas surrounding the Project Site. The reduction in luminosity resulting from the alternative's reduced building profile would not be sufficient to be noticeable in comparison to the proposed Project. Lighting at ground level for this alternative and the proposed Project would be the same. Building materials used would also be the same, with resulting similar glare effects. Therefore, similar to the proposed Project, illuminance levels associated with building and site lighting under Alternative 2 would be less than significant.

Additionally, as with the proposed Project, development under Alternative 2 could affect daytime glare conditions with the introduction of a new building at the Project Site. To address daytime glare conditions, Alternative 2 would incorporate similar project design features as the proposed Project, including the use of glass in building façades that is anti-reflective or treated with an anti-reflective coating in order to minimize glare. Thus, development of Alternative 2 would not incorporate substantial amounts of highly reflective building materials or signage that would be highly visible to off-site glare-sensitive uses and would not substantially alter the character of the off-site areas surrounding the Project Site or interfere with the performance of an off-site activity. Therefore, similar to the proposed Project, daytime glare under Alternative 2 would be less than significant.

(4) Shading

As discussed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR, the proposed Project would not have a significant shading impact on nearby

sensitive receptors. Alternative 2 would construct an eight-story building with similar massing to the proposed Project and the general shading patterns would be similar. Since the proposed building height under Alternative 2 would be slightly lower than the proposed Project, shading under Alternative 2 would be slightly less than that of the proposed Project and would also be less than significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 2 would involve the same amount of excavation as the proposed Project. As with the proposed Project, construction of Alternative 2 would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. The intensity of air emissions and fugitive dust from excavation, site preparation, and construction activities would be the same on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized emissions on these days would be the same as those of the proposed Project and would be less than significant.

(b) Toxic Air Contaminants

As with the proposed Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the proposed Project would result in less-than-significant impacts with regard to TAC emissions. Therefore, similar to the proposed Project, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Alternative 2 would slightly reduce the floor area ratio (FAR) and the gross floor area on the Project Site from approximately 132,000 square feet as proposed by the Project to approximately 116,000 square feet; however, the reduction in square footage would not result in an actual reduction in usage as the approximate 16,137 square feet of uses proposed for the Arts Club would merely be relocated to a subterranean level. Accordingly, as with the Project, operation of Alternative 2 would incorporate project design features to support and promote environmental sustainability, as discussed in Section II, Project Description, and Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. While these

features are designed primarily to reduce GHG emissions, they would also serve to reduce criteria air pollutants. As discussed in Section IV.B., Air Quality, of this Draft EIR, regional and localized emissions resulting from operation of the Project (under both existing and future conditions) would not exceed any of the SCAQMD's daily regional operational thresholds. Therefore, since Alternative 2 would be conservatively assumed to have the same amount of uses, members, employees, and anticipated guests and visitors as the proposed Project, regional and localized operational emissions generated by Alternative 2 (under both existing and future conditions) would be the same as the proposed Project. As such, similar to the proposed Project, impacts related to regional and localized operational emissions under Alternative 2 would be less than significant.

(b) Toxic Air Contaminants

Similar to the proposed Project, Alternative 2 would not include any substantial TAC sources as defined in the South Coast Air Quality Management District's (SCAQMD) *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005) and the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* (2005). Since Alternative 2 would be conservatively assumed to have the same amount of uses, members, employees, and anticipated guests and visitors as the proposed Project, Alternative 2 would result in some TAC emissions, primarily from mobile source emissions, which, as discussed above, would be expected to be the same as the mobile source emissions generated by the proposed Project. Therefore, similar to the proposed Project, TAC impacts would be less than significant under Alternative 2.

c. Geology and Soils

Under Alternative 2, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, subsidence, expansive soils would be the same as those under the proposed Project because such impacts are a function of the Project Site's underlying geologic conditions. Alternative 2 would be developed within the same site as the proposed Project, on the same geology and soils as the proposed Project, and would comply with the same regulatory requirements as the proposed Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the proposed Project, Alternative 2 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the City of West Hollywood Building Code. Alternative 2 would also implement the same mitigation measure (Mitigation Measure C-1) as the proposed Project, which requires the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Overall, impacts related to geology and soils under Alternative 2 would be less than significant with mitigation, and such impacts would be similar to those of the proposed Project.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined, in large part, by the number of daily trips generated and energy and water consumption by the proposed land uses. Under Alternative 2, since Alternative 2 would be conservatively assumed to have the same amount of uses, members, employees, and anticipated guests and visitors as the proposed Project, the trip generation and energy and water consumption from proposed land uses would be expected to be the same as the proposed Project. Thus, the amount of GHG emissions generated by Alternative 2 would also be expected to be the same as the amount generated by the proposed Project, as presented in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. Alternative 2 would incorporate the same project design features as the proposed Project to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance and the California Green Building Standards Code (CALGreen). With compliance with the City's Green Building Ordinance and the implementation of the same sustainability features as the proposed Project, it is anticipated that Alternative 2 would be consistent with the GHG reduction goals and objectives included in City's Climate Action Plan and adopted state and regional regulatory plans. Thus, similar to the proposed Project, impacts related to GHG emissions under Alternative 2 would be less than significant.

e. Hazards and Hazardous Materials

As with the proposed Project, Alternative 2 would require the use of products for construction and operations that are routinely used in performing everyday household and retail activities consistent with regulatory requirements. This alternative would not require the use of hazardous materials beyond these routinely used products. Similar to the proposed Project, Alternative 2 would comply with applicable regulations regarding the storage, generation, handling, and disposal of hazardous materials. Furthermore, construction and operation of Alternative 2 would not expose persons to substantial risk resulting from the release of hazardous materials or from exposure to a health hazard in excess of regulatory standards or interfere with existing or projected future emergency response capacity to the Project area. Therefore, similar to the proposed Project, impacts related to hazards and hazardous materials under Alternative 2 would be less than significant during construction and operation of the proposed development.

f. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

Similar to the proposed Project, construction activities under Alternative 2 would require grading and excavation that would have the potential to temporarily alter the

existing surface drainage patterns and flows within the Project Site by diverting existing surface flows as a result of exposing underlying soils and making the Project Site temporarily more permeable. However, as with the proposed Project, Alternative 2 would be required to comply with all applicable City grading permit regulations, including, but not limited to, the City's Green Building Ordinance and WHMC requirements, that require necessary measures, plans, and inspections to reduce flooding, sedimentation, and erosion. In addition, through implementation of BMPs consistent with the National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit, implementation of a Local Storm Water Pollution Prevention Plan (LSWPPP), and compliance with applicable City grading regulations, construction of Alternative 2 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. Similarly, adherence to standard compliance measures during construction activities would ensure that Alternative 2 would not cause flooding that would have the potential to harm people or damage property or sensitive biological resources, substantially reduce or increase the amount of surface water flow from the Project Site into a water body, result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direction of water flow during construction, or result in runoff water that would exceed the capacity of existing or planned stormwater drainage systems. As such, similar to the proposed Project, construction-related impacts to surface water hydrology under Alternative 2 would be less than significant.

(b) Operation

Alternative 2 would result in the same reduction of impervious area as the proposed Project (i.e., from 99 percent to 95 percent). Accordingly, similar to the proposed Project, the change in stormwater peak flow rate is negligible and would remain at 1.57 cubic feet per second (cfs). As with the proposed Project, Alternative 2 would provide either a capture and reuse system or a biofiltration system to manage stormwater flows. As such, Alternative 2 would not result in any incremental impact on either on-site or off-site flooding during a 50-year storm event, substantially reduce or increase the amount of surface water in a water body, or create or contribute runoff water that would exceed the capacity of the storm drain system. Furthermore, Alternative 2 would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation, or flooding on- or off-site. As such, similar to the proposed Project, operation of Alternative 2 would result in a less-than-significant impact on surface water hydrology.

(2) Surface Water Quality

(a) Construction

Similar to the proposed Project, construction activities, such as earth moving, maintenance/operation of construction equipment, pavement grinding, and handling/storage/disposal of materials, associated with Alternative 2 could contribute to pollutant loading in stormwater runoff. However, Alternative 2 would incorporate similar project design features as the proposed Project, including Project Design Feature F-3 related to the preparation of an LSWPPP and an Erosion Control Plan (ECP) to identify potential pollutant sources that may affect the quality of discharge associated with construction activity, identify non-stormwater discharges, and recommend means and methods to effectively prohibit the entry of pollutants into the public storm drain system during construction. As with the proposed Project, through implementation of the LSWPPP and ECP, and City grading regulations, including the implementation of BMPs, construction of Alternative 2 would not result in discharge that would create pollution that would alter the quality of the water of the state (i.e., Ballona Creek and Santa Monica Bay) to a degree, which unreasonably affects beneficial uses of the waters; contaminate the quality of the water of the state by waste to a degree, which creates a hazard to the public health through poisoning or through the spread of diseases; or create a nuisance that would be injurious to health, affect an entire community or neighborhood or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of Alternative 2 would not result in discharges that would provide substantial additional sources of polluted runoff, cause regulatory standards to be violated in Santa Monica Bay, or substantially degrade water quality. As such, similar to the proposed Project, construction-related impacts to surface water quality under Alternative 2 would be less than significant.

(b) Operation

Similar to the proposed Project, with the implementation of an approved LID Plan, including either a capture and reuse system or biofiltration BMP in the form of pre-cast hard bottom stormwater planter structures with layers of mulch, soil, and gravel (which would filter and treat stormwater, removing pollutants though a variety of physical, biological, and chemical treatment processes, before discharging the stormwater via an underdrain into the public infrastructure), operation of Alternative 2 would not provide substantial additional sources of polluted runoff or result in discharges that would cause pollution that would alter the quality of the waters of the state (i.e., Ballona Creek and Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; contaminate the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or create a nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable

number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, operation and maintenance of the LID features under Alternative 2 would not result in discharges that would violate any water quality standards or waste discharge requirements or substantially degrade surface water quality. Therefore, similar to the proposed Project, impacts to surface water quality under Alternative 2 would be less than significant and beneficial in comparison to existing conditions.

(3) Groundwater Hydrology

(a) Construction

Development of this alternative would include subterranean levels that would reach approximately 72 feet below Sunset Boulevard at its lowest point, and required excavation would reach a depth of approximately 79 feet below Sunset Boulevard at its lowest point. Similar to the proposed Project, since the historic high groundwater elevation at the Project Site was found to be approximately 22 feet and groundwater was encountered in borings at a depth of 36 feet, groundwater may be encountered during excavation activities associated with Alternative 2, and temporary dewatering may be required within the Project Site. As with the proposed Project, in the event that temporary dewatering is required, a small amount of groundwater would be removed during excavation, but only until such time as waterproofing is installed up to the groundwater table. Any discharge of groundwater during construction of the proposed Project would occur pursuant to, and comply with, the applicable permit requirements of a General NPDES Permit issued by the Los Angeles Regional Water Quality Control Board (LARWQCB). Groundwater shall only be discharged to the storm drain system, not to the City-owned sewer system. Therefore, if dewatering is required, operation of the temporary dewatering system would have a minimal effect on local groundwater recharge in the vicinity of the Project Site. Accordingly, similar to the proposed Project, Alternative 2 is not anticipated to adversely impact the flow rate or direction of groundwater and would not have an adverse effect on any water supply wells. Therefore, construction of Alternative 2 would not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, deplete groundwater supplies, result in a demonstrable and sustained reduction of groundwater recharge capacity, or interfere with groundwater recharge. As such, similar to the proposed Project, impacts related to groundwater hydrology under Alternative 2 would be less than significant.

(b) Operation

Similar to the proposed Project, due to the depth of excavation associated with Alternative 2, groundwater may be encountered. In lieu of a permanent dewatering system, the building's foundation would be designed in a manner as to support the proposed structure in saturated soils conditions. This foundation design would result in

only minor impacts to the top of the groundwater table and would not affect any supply wells. Therefore, as with the proposed Project, operation of Alternative 2 would not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity. As such, similar to the proposed Project, impacts related to groundwater hydrology under Alternative 2 would be less than significant.

(4) Groundwater Quality

(a) Construction

Similar to the proposed Project, during on-site grading and building construction, the use of hazardous materials, such as fuels, paints, solvents, and concrete additives, would require proper management and, in some cases, disposal to minimize, if not avoid, the releases of hazardous materials into groundwater. As with the proposed Project, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential for the construction of Alternative 2 to release contaminants into the groundwater that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells. Accordingly, similar to the proposed Project, construction impacts on groundwater quality under Alternative 2 would be less than significant.

(b) Operation

Similar to the proposed Project, Alternative 2 proposes a capture and reuse system or biofiltration system to treat stormwater runoff to minimize, if not avoid, potential impacts to groundwater. Surface contaminants also have the potential to adversely impact the quality of groundwater. As with the proposed Project, operation of Alternative 2 would involve the limited use of potentially hazardous materials typical of those used in commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into the groundwater. However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. As with the proposed Project, compliance with all applicable federal, state, and local requirements, concerning the handling, storage and disposal of hazardous waste, would reduce the potential for operation of Alternative 2 to release

contaminants into the groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, cause a violation of regulatory water quality standards at an existing production well, or otherwise substantially degrade groundwater quality. Accordingly, similar to the proposed Project, impacts on groundwater quality under Alternative 2 would be less than significant.

g. Land Use

Alternative 2 would develop the same uses as the proposed Project at a slightly reduced height. However, Alternative 2 would require the same discretionary approvals as the proposed Project. The new building proposed by Alternative 2 and its various uses would be placed within the same building footprint as the proposed Project. Similar to the proposed Project, with approval of the requested discretionary approvals and implementation of the project design features that would be incorporated into the proposed Project (which are discussed elsewhere in this Draft EIR), Alternative 2 would be consistent with the overall intent of the applicable goals and objectives of the SSP and the WHMC requirements and applicable regional plans. As with the proposed Project, Alternative 2 would help serve many goals and policies under the General Plan and SSP by: (1) contributing to the maintenance of Sunset Boulevard as a regional, national, and international destination for entertainment, and the primary economic engine to the City; (2) adding to the eclectic urban environment by creating a building that enhances the Sunset Boulevard experience and its dynamic urban environment characterized by widely-know entertainment destinations; (3) providing new commercial, retail, restaurant, and entertainment uses in an area well-served by public transit; (4) increasing density and height compatible with the City's vision to strengthen the attractiveness and the economic viability of the western portion of Sunset Boulevard; (5) increasing the pedestrian experience and activity in the western portion of Sunset Boulevard; and (6) incorporating environmentally sustainable features and construction protocols to reduce energy and water usage and waste to reduce GHG emissions and help minimize the impact on natural resources and infrastructure. Thus, similar to the proposed Project, impacts related to land use consistency under Alternative 2 would be less than significant.

Alternative 2 includes the same types of uses as the proposed Project. Therefore, similar to the proposed Project, the mix of uses proposed by Alternative 2, including retail space, an art gallery, creative offices, as well as guestrooms, restaurants, lounges, and bars to support the Arts Club, would be compatible with and would complement existing and future development on the Sunset Strip and would not substantially or adversely change the existing land use relationships between the Project Site and adjacent land uses. As noted in Section IV.H, Land Use, of this Draft EIR, the Project Site is located in a highly urbanized area with a variety of commercial, retail, restaurant, and cultural and entertainment-related uses, including widely-known destination night clubs and music venues, such as The Roxy Theatre, Whisky A Go Go, and the Viper Room. As with the

proposed Project, Alternative 2 would revitalize the Project Site by building a high quality commercial development that provides a variety of uses that would enhance and support the community's vision of the Sunset Strip as a high-quality international entertainment destination. In addition, as with the proposed Project, Alternative 2 would provide for retail uses, employment opportunities, an art gallery, and other urban uses supportive of the surrounding area and the City.

Similar to the proposed Project, Alternative 2 would be compatible with the types of land uses in the vicinity of the Project Site, and impacts associated with land use compatibility would be less than significant.

h. Noise

(1) Construction

Alternative 2 would involve the same general phases of construction as the proposed Project (i.e., site grading and excavation, building construction, and finishing/landscape installation). As with the proposed Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips, in close proximity to sensitive receptors. Under Alternative 2, on- and off-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days to those of the proposed Project. Thus, noise and vibration levels during maximum activity days, which are used for measuring noise impact significance, would be similar to those of the proposed Project. As with the proposed Project, Alternative 2 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the proposed Project to reduce noise and vibration levels during construction to the extent feasible. Similar to the proposed Project, with implementation of mitigation measures, on-site vibration impacts associated with potential building damage would be reduced to a less-than-significant level under Alternative 2. However, as with the proposed Project, construction of Alternative 2 would result in significant and unavoidable on-site noise and vibration impacts (related to human annoyance) during construction. As with the proposed Project, construction of Alternative 2 would also result in a cumulative significant and unavoidable on-site noise impact in the event the construction of Related Project No. 43, which is located immediately west of the Project Site, occurs simultaneously with Alternative 2 due to the presence of sensitive receptors immediately south of the Project Site and Related Project No. 43.

(2) Operation

As described in Section IV.H, Noise, of this Draft EIR, sources of operational noise include on-site stationary noise sources, such as outdoor mechanical equipment (i.e.,

HVAC equipment), activities associated with the outdoor areas (e.g., pool deck, terraces, landscaped plaza, etc.), parking facility, and loading dock/trash collection area, and off-site mobile (roadway traffic) noise sources. As with the proposed Project, new mechanical equipment (e.g., air ventilation equipment) under Alternative 2 would be located on the roof level and in the interior of the building. Alternative 2 would incorporate similar project design features as the proposed Project, including Project Design Feature H-3, which will enclose or screen all outdoor mounted mechanical equipment from off-site noise-sensitive receptors. In addition, Alternative 2 would include outdoor spaces within the Project Site in areas similar to the proposed Project and at similar distances from off-site noise sensitive receptors. Noise sources emanating from the rooftop deck would be located slightly closer to noise sensitive receptors due to the reduced height of the building. Overall, however, noise levels associated with activities within the outdoor spaces would be similar to those of the proposed Project. The proposed loading dock and trash collection areas for Alternative 2 would also be located in the same location as the proposed Project, and Alternative 2 would require the same amounts of service by loading vehicles and trucks as with the proposed Project. Thus, noise impacts from loading dock and trash collection areas would also be the same as the proposed Project. Alternative 2 would provide the same number of parking spaces as the proposed Project, which would result in the same potential noise levels associated with a parking facility as with the proposed Project. As such, similar to the proposed Project, on-site noise under Alternative 2 would be less than significant.

With regard to off-site noise sources, since Alternative 2 would be conservatively assumed to have the same amount of uses, members, employees, and anticipated guests and visitors as the proposed Project, Alternative 2 would be expected to generate the same daily vehicle trips (1,961 net daily trips) as the proposed Project, as discussed below in Subsection V.B.2.j. Accordingly, Alternative 2 would result in the same off-site traffic-related noise levels as those generated by the proposed Project. As with the proposed Project, when compared with existing conditions, Alternative 2 would result in a maximum of 6.5 dBA (CNEL) increase in traffic-related noise along Hilldale Avenue (south of Sunset Boulevard). As with the proposed Project, at other analyzed roadway segments, the traffic-related noise levels caused by Alternative 2 would not result in a measurable increase. Thus, the estimated increase in traffic noise levels as compared to existing conditions would be above the 5-dBA CNEL significance threshold. Therefore, traffic noise impacts resulting from Alternative 2 in comparison to existing conditions would be significant. However, as with the proposed Project, traffic noise levels on surrounding streets are expected to increase by the time Alternative 2 is constructed (i.e., 2020, the expected buildout year) due to ambient growth and the development of other projects in the vicinity and under future traffic-related noise levels. As such, Alternative 2 would result in a maximum increase of up to only 2.3 dBA (CNEL) along Hilldale Avenue (south of Sunset Boulevard). At other analyzed roadway segments, the increase in traffic-related noise levels would be negligible (i.e., 0.1 dBA or lower). The increase in traffic noise levels would

be well below the relevant 3-dBA CNEL significance threshold under future conditions. Therefore, similar to the proposed Project, off-site noise impacts would be less than significant under future conditions.

Under Alternative 2, Project-level operational noise from off-site mobile sources would exceed the 5-dBA significance threshold along Hilldale Avenue (south of Sunset Boulevard), in comparison to existing conditions. In addition, the alternative's contribution to cumulative operational noise impacts due to off-site mobile sources would be similar to that of the proposed Project since the peak-hour traffic volumes generated by Alternative 2 would be expected to be the same as those of the proposed Project. Therefore, similar to the proposed Project, Alternative 2 would also result in significant and unavoidable Project-level and cumulative operational noise impacts from off-site traffic.

i. Public Services

(1) Police Protection

(a) Construction

The types of construction activities under Alternative 2 would be similar to those under the proposed Project. Accordingly, the potential for theft and vandalism during construction activities at the Project Site would be the same as the proposed Project. As with the proposed Project, Alternative 2 would incorporate similar project design features as the proposed Project during construction, including Project Design Feature I.1-1, which involves implementation of temporary security measures, such as fencing, lighting, and locked entry to secure the Project Site during construction. Therefore, similar to the proposed Project, potential impacts associated with theft and vandalism during construction of Alternative 2 would be less than significant.

Similar to the proposed Project, construction activities under Alternative 2 could also potentially impact Los Angeles County Sheriff's Department (LACSD) police protection services and response times within the West Hollywood Station service area due to construction impacts on the surrounding roadways. As with the proposed Project, access to the Project Site and the surrounding area could be impacted by construction-related activities, such as temporary lane closures, and the generation of traffic resulting from construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the proposed Project, a Construction Management Plan will be implemented during construction of Alternative 2 pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Elements of the Construction Management Plan will be implemented to provide temporary traffic controls to direct traffic around any closures (e.g., signs, delineators, etc.) and improve traffic flow of

adjacent rights-of-way and public roadways, as well as to ensure pedestrian safety. Accordingly, upon implementation of Project Design Feature J-1 and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LACSD to serve the Project Site. As with the proposed Project, construction of Alternative 2 would not necessitate the provision of new or physically altered government facilities in order to maintain the LACSD's capability to serve the Project Site. As such, Alternative 2 would not result in adverse physical impacts associated with the need and construction of new or altered facilities. Therefore, similar to the proposed Project, construction-related impacts to police protection services under Alternative 2 would be less than significant.

(b) Operation

As with the proposed Project, Alternative 2 would increase the amount of visitors and employees on the Project Site and would, therefore, increase the police service population in the West Hollywood Station service area. Similar to the proposed Project, Alternative 2 would incorporate numerous design features, including, but not limited to, private on-site security, club member and guess access controls, and sufficient lighting, to enhance safety within and immediately surrounding the Project Site. In addition to the implementation of these project design features, as with the proposed Project, Alternative 2 would also generate revenues to the City's General Fund, which would continue to support funding dedicated to public safety and LACSD and police services. Such funds would also be used towards staff development, supplies and equipment, and other programs and outreach implemented by the LACSD. The project design features identified above, as well as this alternative's contribution to the General Fund, would help offset the increase in demand for LACSD police services under Alternative 2. Therefore, similar to the proposed Project, impacts on police services under Alternative 2 would be less than significant.

Similar to the proposed Project, traffic generated by Alternative 2 would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, as with the proposed Project, the incremental increase in delay with the addition of Alternative 2 traffic is not expected to exceed significance thresholds. In addition, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, operation of Alternative 2, including its traffic generation, would not cause a substantial increase in emergency response times due to traffic congestion. Therefore, similar to the proposed Project, impacts on emergency response times under Alternative 2 would be less than significant.

(2) Fire Protection

(a) Construction

Similar to the proposed Project, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the proposed Project, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Similar to the proposed Project, construction activities under Alternative 2 could also potentially impact the provision of LACFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. As with the proposed Project, access to the Project Site and the surrounding vicinity could be impacted by construction-related activities, such as temporary lane closures, and the generation of traffic resulting from construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the proposed Project, a Construction Management Plan will be implemented during construction of Alternative 2 pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. As with the proposed Project, construction of Alternative 2 would not create capacity or service level problems or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, similar to the proposed Project, impacts to fire protection and emergency medical services during construction of Alternative 2 would be less than significant.

(b) Operation

As with the proposed Project, Alternative 2 would increase the amount of visitors and employees on the Project Site and would, therefore, contribute to an increase in demand for LACFD fire protection and emergency medical services. However, as with the proposed Project, Alternative 2 would be located within close proximity of Fire Station No. 7. In addition, similar to the proposed Project, Alternative 2 would implement all applicable Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Alternative 2 would also implement applicable design features regarding high-rise structures in accordance with the City's Fire Code.

Furthermore, as with the proposed Project, Alternative 2 would include the installation of automatic fire sprinklers throughout the proposed building, which would reduce the demand placed on the LACFD.

In addition, similar to the proposed Project, Alternative 2 would also submit an emergency response plan for LACFD approval. Emergency access also would be maintained on-site in accordance with Fire Code requirements. Driveway and internal circulation would be designed to incorporate all applicable County Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

As with the proposed Project, Alternative 2 would be required to meet LACFD fire flow requirements. Furthermore, Alternative 2 would generate revenues to the City's General Fund, which would continue to support the funding of fire protection services, fire prevention, and public safety outreach performed by the LACFD. Therefore, similar to the proposed Project, overall impacts with regard to LACFD fire protection during operation of Alternative 2 would be less than significant.

j. Traffic, Access, and Parking

SB 743 amended CEQA to streamline environmental review for several categories of development projects, including the development of infill projects in transit priority areas (TPA). Among other things, under SB 743 and PRC Section 21099(d)(1), parking impacts are not considered significant impacts under CEQA if a project is a residential, mixed-use residential, or employment center project and is located on an infill site within a TPA. As with the proposed Project, Alternative 2 is considered an employment center project on an infill site within a TPA. Accordingly, as an employment center project located in a TPA, Alternative 2 is one of several types of projects whose parking impacts shall not be considered significant impacts on the environment. Therefore, the analysis regarding this alternative's parking is provided for informational purposes only.

(1) Construction

As with the proposed Project, construction of Alternative 2 would generate additional trips from heavy-duty construction equipment, haul trucks, and construction workers. As discussed above, Alternative 2 would involve the same amount of excavation as with the proposed Project and therefore, the maximum daily haul truck trips and construction worker trips would be the same on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, traffic impacts on these days would be similar to those of the proposed Project. As with the proposed Project, Alternative 2 would incorporate Project Design Feature J-1, which entails implementation of a Construction Management Plan to ensure that the majority of haul truck activity to and

from the Project Site would occur outside of the A.M. and P.M. peak hours. In addition, worker trips to and from the Project Site would also occur outside of the peak hours. Therefore, similar to the proposed Project, peak-hour construction traffic impacts under Alternative 2 are expected to be less than significant during construction.

Similar to the proposed Project, construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. As with the proposed Project, adjacent to the Project Site, the curb lanes on Sunset Boulevard and Hilldale Avenue would be used intermittently throughout the construction period for equipment staging, concrete pumping, etc. The use of the public right-of-way along Sunset Boulevard and Hilldale Avenue would require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed. As identified in the Construction Management Plan, temporary controls will be provided to direct traffic and pedestrians around any closures and ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead coverings). Therefore, similar to the proposed Project, impacts related to traffic and pedestrian access would be less than significant.

There are no bus stops adjacent to the Project Site, and, therefore, no temporary impacts to transit are expected. Parking is allowed on both Sunset Boulevard and Hilldale Avenue (during certain hours of the day) adjacent to the Project Site; consequently, similar to the proposed Project, the installation of construction fences under Alternative 2 could result in the temporary loss of up to four on-street metered parking spaces on Sunset Boulevard and up to three on-street metered parking spaces on Hilldale Avenue. As with the proposed Project, construction of Alternative 2 is not expected to create hazards for roadway travelers, bus riders, or people utilizing on-street parking spaces, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) would be incorporated into the Construction Management Plan, included as Project Design Feature J-1. Construction-related impacts associated with access and transit would be less than significant, and the implementation of Project Design Feature J-1 would further reduce those impacts.

Based on the above, similar to the proposed Project, impacts to traffic, access, and parking during construction under Alternative 2 would be less than significant.

(2) Operation

Alternative 2 would essentially have the same amount of uses as the proposed Project and is expected to have the same number of members, employees, and anticipated guests and visitors. Accordingly, Alternative 2 would be expected to generate the same number of trips as the proposed Project (i.e., approximately 1,961 net daily trips, including 122 net trips during the A.M. peak hour and 159 net trips during the P.M. peak hour, as shown in Appendix L of this Draft EIR. As such, impacts to the intersection level of service and the regional transportation system would be the same as the proposed Project. Therefore, similar to the proposed Project, impacts to intersection level of service and the regional transportation system would be less than significant.

With regard to access and circulation; bicycle, pedestrian, public transit, and vehicular safety; and parking, Alternative 2 proposes the same access and circulation scheme and would provide the same number of parking spaces as the proposed Project. Therefore, impacts to access and circulation; bicycle, pedestrian, and vehicular safety; and parking under Alternative 2 would be similar to those of the proposed Project and would be less than significant.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the proposed Project, construction activities under Alternative 2 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 2 (from the start of construction to buildout of Alternative 2 in 2020). As with the proposed Project, the amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, water use during construction would be anticipated to be less than the net new water consumption of Alternative 2 at buildout. In addition, water use during construction would be short-term and have an intermittent demand only for water during construction activities and would be somewhat offset by the water currently consumed by the existing commercial building, which would be removed. As with the proposed Project, construction activities under Alternative 2 would require minimal water demand and are not anticipated to have a substantial adverse impact on available water supplies or infrastructure. In addition, off-site construction impacts would be temporary in nature and would not disrupt water service. As such, similar to the proposed Project, construction-related impacts to water supply under Alternative 2 would be less than significant.

In addition, similar to the proposed Project, the existing water infrastructure would be adequate to provide for the water flow necessary to serve the proposed development under Alternative 2. Minor off-site construction work associated with trenching would occur, resulting in partial street closures along Sunset Boulevard and/or Hilldale Avenue adjacent to the Project Site. However, such closures would be temporary in nature and would not result in a substantial inconvenience to motorists or pedestrians, who would have additional options for navigating around the construction activities. Furthermore, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, a Construction Management Plan will be implemented during construction activities pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Overall, construction activities associated with Alternative 2 would not require or result in the construction of new water facilities or expansion of existing facilities, except for the new service connections to connect to the mainlines. In addition, the water distribution capacity would be adequate to serve the proposed development under Alternative 2. Furthermore, off-site construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or inconvenience to motorists or pedestrians. As such, similar to the proposed Project, construction-related impacts to water infrastructure under Alternative 2 would be less than significant.

(b) Operation

Alternative 2 would essentially have the same amount of uses as the proposed Project and is expected to have the same number of members, employees, and anticipated guests and visitors. As with the proposed Project, Alternative 2 would develop a multi-use development on the Project Site, including publicly-accessible retail space, an art gallery, and creative offices, as well as a variety of uses for members and guests of the Arts Club, including restaurants, lounges, bars, screening rooms, a supper club, fitness/spa facilities, and guestrooms. Alternative 2 would generate an increase in demand for water compared to existing conditions. However, Alternative 2 would generate the same demand for water as the proposed Project. Since the estimated net water demand of the proposed Project for the City of Beverly Hills service area was found to be within its available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040, based on the City of Beverly Hills' Urban Water Management Program (UWMP), the same would be true for Alternative 2. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be estimated to be the same as that of the proposed Project. Thus, similar to the proposed Project, impacts to water supply and water infrastructure under Alternative 2 would be less than significant.

(2) Wastewater

(a) Construction

Similar to the proposed Project, during construction of Alternative 2, existing sewer laterals would be capped, and no sewage would enter the public sewer system. Temporary facilities (such as portable toilet and hand wash areas) will be provided by the contractor at the Project Site. Sewage from these temporary facilities will be collected and hauled off-site to a waste treatment facility and not discharged into the public sewer system. As such, wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, similar to the proposed Project, construction of Alternative 2 is not anticipated to substantially or incrementally exceed the future scheduled capacity of the Hyperion Treatment Plant (HTP) or any other wastewater treatment plant.

Additionally, construction activities associated with the installation of new or relocated sewer line connections would be confined to trenching in order to place the sewer lines below surface. Such activities would be coordinated through the City so as not interrupt existing service to other users. Therefore, similar to the proposed Project, construction activities are not anticipated to have any adverse impact on wastewater conveyance or treatment infrastructure, and impacts would be less than significant.

(2) Operation

Alternative 2 would essentially have the same amount of uses as the proposed Project and is expected to have the same number of members, employees, and anticipated guests and visitors. As with the proposed Project, Alternative 2 would develop a multi-use development on the Project Site, including publicly-accessible retail space, an art gallery, and creative offices, as well as a variety of uses for members and guests of the Arts Club, including restaurants, lounges, bars, screening rooms, a supper club, fitness/spa facilities, and guestrooms. Therefore, while Alternative 2 would generate an increase in wastewater generation compared to existing conditions, this estimated wastewater generation and wastewater flow would be the same as the proposed Project. Thus, it can be reasonably concluded that since the proposed Project-generated wastewater would be accommodated by the existing capacity of the HTP, the wastewater generated by Alternative 2 would also be accommodated by the existing capacity of the HTP. As such, similar to the proposed Project, impacts related to wastewater generation under Alternative 2 would be less than significant.

(3) Solid Waste

(a) Construction

Construction of Alternative 2 would involve demolition and building construction activities. Alternative 2 would also remove the existing commercial building, surface parking lot, and subterranean parking on the Project Site to construct a multi-use development similar to the proposed Project. Thus, the amount of demolition and construction waste generated by Alternative 2 would be similar to the proposed Project. Alternative 2 would implement similar project design features as the proposed Project and would be required to prepare and implement a Construction and Demolition Waste Management Plan to comply with the requirements of the WHMC. As with the proposed Project, specific project design features would include implementation of waste reduction measures to promote source reduction and recycling, consistent with AB 939 and other applicable state and local statutes. Given that the demolition and construction waste would be similar to the proposed Project, it is reasonable to assume that construction of Alternative 2 would not conflict with any of the solid waste policies and objectives of the State or City of West Hollywood. As such, similar to the proposed Project, solid waste impacts during construction under Alternative 2 would be less than significant.

(b) Operation

Alternative 2 would essentially have the same amount of uses as the proposed Project and is expected to have the same number of members, employees, and anticipated guests and visitors. As with the proposed Project, Alternative 2 would develop a multi-use development on the Project Site, including publicly-accessible retail space, an art gallery, and creative offices, as well as a variety of uses for members and guests of the Arts Club, including restaurants, lounges, bars, screening rooms, a supper club, fitness/spa facilities, and guestrooms. Therefore, while Alternative 2 would be expected result in an increase in solid waste generation compared to existing conditions, this estimated solid waste generation would be the same as the proposed Project. Thus, it can be reasonably concluded that since the proposed Project's solid waste disposal demands could be met without the need for additional landfill capacity, solid waste disposal demands by Alternative 2 would also be met without the need for additional landfill capacity. As such, similar to the proposed Project, impacts related to solid waste generation under Alternative 2 would be less than significant.

(4) Energy

(a) Construction

Similar to the proposed Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited

basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Construction of Alternative 2 would involve similar demolition and building construction activities as the proposed Project. As with the proposed Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Therefore, similar to the proposed Project, impacts on energy resources associated with short-term construction activities under Alternative 2 would be less than significant.

(b) Operation

Alternative 2 would essentially have the same amount of uses as the proposed Project and is expected to have the same number of members, employees, and anticipated guests and visitors. As with the proposed Project, Alternative 2 would develop a multi-use development on the Project Site, including publicly-accessible retail space, an art gallery, and creative offices, as well as a variety of uses for members and guests of the Arts Club, including restaurants, lounges, bars, screening rooms, a supper club, fitness/spa facilities, and guestrooms. Therefore, while Alternative 2 would generate an increase in energy consumption (i.e., electricity, natural gas, and petroleum-based fuels) compared to existing conditions, this estimated energy consumption would be the same as the proposed Project. Furthermore, similar to the proposed Project, Alternative 2 would implement the same project design features as the proposed Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the proposed Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. Therefore, similar to the proposed Project, impacts to energy resources under Alternative 2 would be less than significant.

3. Comparison of Impacts

As evaluated above, Alternative 2 would not eliminate the proposed Project's significant and unavoidable impacts related to on-site construction noise impacts (both Project-level and cumulative conditions), and on-site construction vibration impacts (related to human annoyance). In addition, both: (1) Project-level off-site traffic noise during operation in comparison to existing conditions under Alternative 2; and (2) cumulative off-site traffic noise during operation under Alternative 2 would each exceed the 5-dBA threshold, specifically along Hilldale Avenue (south of Sunset Boulevard), and this alternative's contribution to this impact would be the same as that of the proposed Project since the peak-hour traffic volumes generated by Alternative 2 would be expected to be the same as those of the proposed Project. Alternative 2's impacts related to operation, including aesthetics/visual quality, views, light and glare; air quality; geology and soils; GHG emissions; hazards and hazardous materials; hydrology and water quality; land use;

noise; public services (police protection and fire protection; traffic, access, and parking; and utilities and service systems (water consumption, wastewater generation, solid waste generation, and energy consumption) would be the same as those under the proposed Project since Alternative 2 would essentially have the same amount of uses as the proposed Project. However, these same impacts of the proposed Project are already less than significant and would not be eliminated with this alternative. Shading would be slightly less than those of the proposed Project and would also be less than significant.

4. Relationship of the Alternative to Project Objectives

Overall, Alternative 2 represents a highly similar development scheme as the proposed Project with one level of Arts Club uses relocated to a subterranean mezzanine level and a reduced building height. Alternative 2 would achieve all of the Project objectives to the same extent as the proposed Project, including the following:

- Add to the diversity of visitor-serving uses available on the Sunset Strip.
- Provide a central location where creative and entrepreneurial patrons come together to meet, exchange ideas, dine, and participate in various cultural events.
- Develop a unique cultural use, which would contribute to the City's economy with an entertainment and creative arts-related venue that includes restaurants, bars, and hospitality uses.
- Enhance the pedestrian connections and activity along Sunset Boulevard through the development of an open and inviting building façade at the sidewalk level featuring a landscaped community plaza that engages the street and the neighborhood community.
- Maximize opportunities for a mix of retail, art gallery, creative offices, entertainment, hospitality, dining, bars, and guestrooms that would further the Sunset Specific Plan's goals to develop the area with a diversity of uses that support daytime and nighttime populations, along with goods and services for City residents.
- Contribute to and expand the diversity of iconic entertainment and cultural venues on the Sunset Strip.
- Support the community's vision of the Sunset strip as a high-quality international entertainment destination.

- Add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment.

- Complement the diverse mix of architectural styles, building heights, and uses along Sunset Boulevard.

- Construct an energy-efficient and environmentally conscious building by incorporating sustainable elements of design, construction, and operation to achieve Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council or satisfy equivalent green building standards.

- Provide significant new creative office space to enhance the City's supply of modern office environments that cater to and respond to the existing and future needs of businesses that will support the economic future and vitality of the City.

- Maximize the number of new permanent jobs generated by the addition of new creative offices, restaurant and retail space, arts gallery and entertainment uses, bars, guestrooms, and fitness and spa facilities, helping to secure a strong and continuous tax base and supply the region with greater employment options.

- Revitalize an under-utilized commercial property in the heart of the Sunset Strip.

However, this alternative would not eliminate the proposed Project's significant and unavoidable impacts related to noise and vibration. Specifically, similar to the proposed Project: (1) construction-period noise and vibration impacts (related to human annoyance) at the project-level would be significant and unavoidable; (2) cumulative noise impacts during construction (in the event the construction of Related Project No. 43 occurs simultaneously with Alternative 2) would be significant and unavoidable; (3) and operational off-site noise impacts, including project-level and cumulative noise impacts, would be significant and unavoidable. Regarding construction noise and vibration impacts, this result occurs because on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days to those of the proposed Project and due to the same construction methods being employed, the extent of construction, and the proximity to sensitive receptors as those of the proposed Project. Regarding operational noise impacts, off-site traffic noise during operation would be similar to the proposed Project since peak-hour trip volumes generated by Alternative 2 would be similar to the peak-hour trip volumes as those of the proposed Project and would exceed the 5-dBA significance threshold.

V. Alternatives

C. Alternative 3: Reduced Density/7-Story Alternative

1. Description of the Alternative

The Reduced Density/7-Story Alternative would include the development of a multi-use, seven-story building on the Project Site through amendments to the General Plan, SSP, and zoning designations to allow for additional height, density, and land uses. As with the proposed Project, this alternative would also require associated requests for approval of demolition, development, administrative, and conditional use permits.

As shown in Figure V-2 on page V-59, Alternative 3 would include the development of a multi-use, seven-story building on the Project Site. The new building would be placed within the same building footprint as the proposed Project and would include the same overall design features and architecture. Similar to the proposed Project, Alternative 3 would include retail and gallery use on the ground floor, creative office space on the second and third floors, Arts Club space on a total of four above-ground floors and within one subterranean level, and a rooftop pool deck terrace with an emergency helipad. Table V-3 on page V-60 compares the proposed uses under Alternative 3 with the proposed Project. As shown in the table, Alternative 3 would include the same uses as the proposed Project. Ground level and rooftop space would be the same as for the proposed Project. However, Alternative 3 would reduce Project square footage by removing one floor of office space. The fitness center/spa, screening rooms, holding bar and support area proposed by the proposed Project on Level 5, as shown in Table II-1 in Section II, Project Description, of this Draft EIR, would be relocated under Alternative 3 to a mezzanine level within Level B2, which could be sufficiently accommodated within the existing space and height capacity of Level B2. As a result, Alternative 3 would remove one level of Arts Club space from the aboveground levels and relocate it to the second subterranean level, providing a total of six below grade levels with a below grade mezzanine level (as compared to the proposed Project's six below grade levels only). The overall number of underground parking levels within the parking structure would not change, and there would be no change in the number of parking spaces. In addition, this reconfiguration in design would not require any expansion of the overall size or depth of the underground parking structure proposed by the Project. Furthermore, as discussed above, Alternative 3 would reduce the overall square footage of the creative office space by eliminating one of the floors (i.e., Level 4 under the proposed Project). As a result,

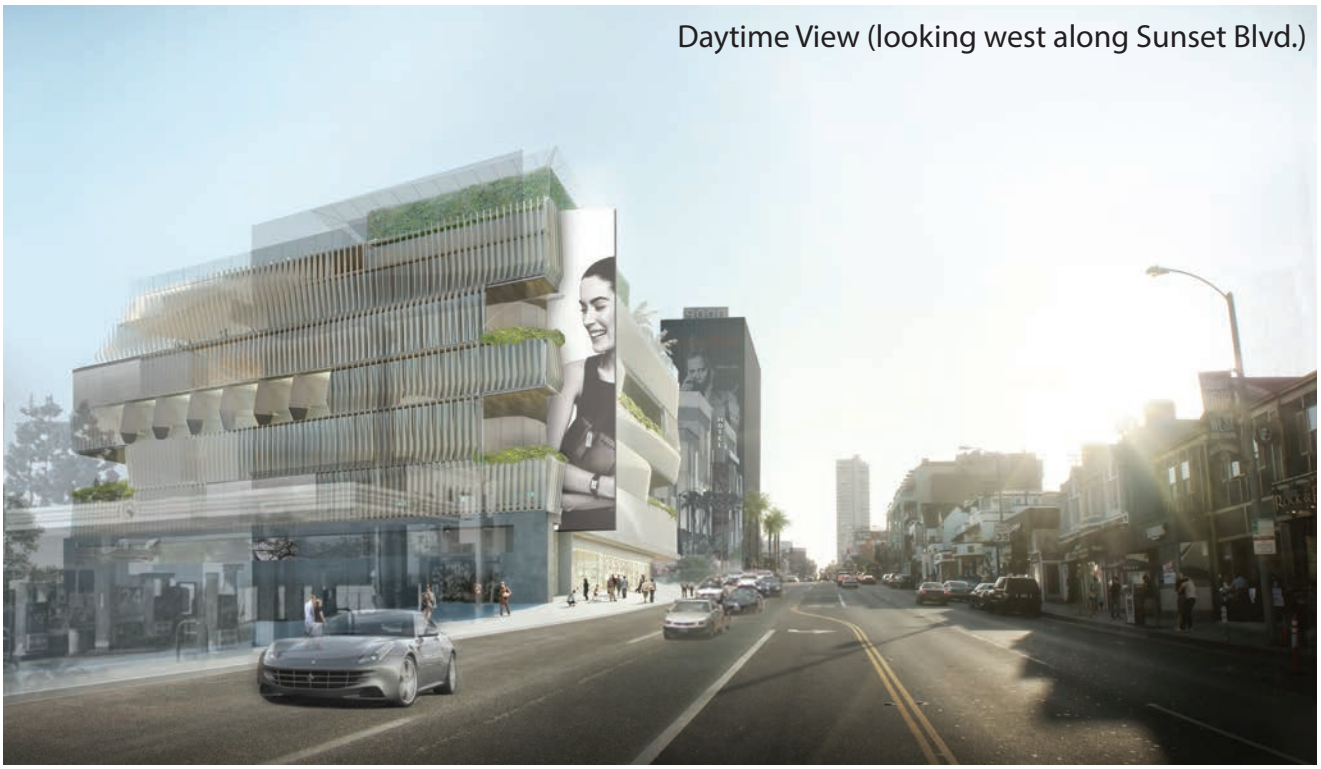

Figure V-2
Alternative 3 (Reduced Density/7-Story Alternative)
Conceptual Rendering

Source: Gensler, 2017.

Table V-3
Summary of Alternative 3 (Reduced Density/7-Story Alternative) Uses and Comparison to the Project

Land Use	Alternative 3	Proposed Project	Difference
Gross Floor Area (FAR)	≈100,000 sf	≈132,000 sf	≈-32,000 sf
Floor Area Ratio	4.9	6.5	-1.6
Arts Club	46,831 sf	62,968 sf	-16,137 sf[a]
Arts Club Guestrooms	15	15	0
Retail Area	6,853 sf	6,853 sf	0 sf
Gallery	2,192 sf	2,192 sf	0 sf
Office	24,788 sf	37,900 sf	-13,112 sf
Pool Terrace (Non-FAR)	6,730 sf	6,730 sf	0 sf
Maximum Building Height	115 ft	141 ft	-26 ft
Number of Parking Spaces	354	354	0
Number of Above-Grade Stories	7	9	-2
Number of Below-Grade Levels	6 and a mezzanine	6	1

sf = square feet
ft = feet
a Note that the 16,137 sf of Arts Club uses that is shown here as removed would actually be relocated within a subterranean level within the parking structure and thus, would be retained. The number of Arts Club members and employees is not expected to change as a result of this reconfiguration in design. Therefore, a conservative analysis of environmental impacts for Alternative 3 would not take account for a reduction in square footage reserved for the Arts Club component.
Source: Gensler, 2017.

Alternative 3 would eliminate two aboveground levels, providing a total of seven aboveground levels and six below grade levels with a mezzanine level.

Alternative 3 would reduce the proposed Project's nine-story, 141-foot building to a seven-story building with a maximum height of 115 feet (measured from the lowest point along Sunset Boulevard). Since Alternative 3 would relocate one of the proposed Project's floor levels underground and eliminate one of the above-ground office floors of the proposed Project, Alternative 3 would reduce the proposed Project's FAR of 6.5 to 4.9 but would still require an amendment to the SSP's allowable base FAR of 1.5 for the Project Site.

Under Alternative 3, all elements and proposed features of the Project, including the building design, landscaped community plaza on the ground level, site access and parking, lighting and signage, security features, and sustainability features, would be remain same.

In addition, Alternative 3 would include a digital billboard sign projecting from the northern façade near the northeastern corner of the building, as illustrated in Figure V-2 on page V-59. This digital billboard, with animated or static content that could display "off-site" advertising, would have a sign face of up to 68 feet in height, 15 feet in width, for a total square footage of approximately 1,020 square feet per side. The digital billboard would also have luminance levels not to exceed 6,000 candelas per square meter during daylight hours (i.e., from sunrise until 20 minutes prior to sunset) and 300 candelas per square meter during evening hours (from sunset until 20 minutes prior to sunrise). Furthermore, from 2:00 A.M. until sunrise, the digital billboard would have no animated content or moving patterns in compliance with Section 3.E.5.b of the City's proposed Sunset Boulevard Off-Site Signage Policy, which is an amendment to the City's Sunset Specific Plan currently under consideration by the City Council.

The signage program proposed under this alternative would be approved under a Development Agreement with the City pursuant to WHMC Chapter 19.66 and would contain negotiated public benefits. Consistent with Section 3.F.1 of the proposed Sunset Boulevard Off-Site Signage Policy, the negotiated public benefits would consider: (1) monthly revenue to the City to address community benefit priorities, and (2) site improvements, such as the already-proposed community landscaped plaza and pedestrian features under this alternative to enhance the pedestrian experience on Sunset Boulevard, as well as a public access agreement with the City for a portion of the digital billboard. The proposed signage program under this alternative would also comply with the requirement of Section 3.C.2.d of the City's proposed Sunset Boulevard Off-Site Signage Policy that applicants undergo an "urban design screening process to ensure that Digital Billboard applications meet the City's criteria for architectural excellence, integration of billboards and architecture, innovation, and qualified teams that include both development and media operations professionals with demonstrated experience."

As with the proposed Project, construction of Alternative 3 would commence with demolition of the existing building structures, surface parking lot, and subterranean parking, followed by grading and excavation for the subterranean parking garage for Alternative 3. Although Alternative 3 would include a subterranean mezzanine level, the estimated depth of excavation expected for the subterranean levels and building foundations would be the same as the proposed Project at approximately 79 feet below grade.[6] Therefore, as with the proposed Project, it is estimated that approximately 48,000 cubic yards of export material (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project

[6] *Level B2 of the proposed Project is proposed to be double-height in order to accommodate potential equipment requirements from the automated parking lift operations, which would be provided within Level B2, which is the first level of the automated parking garage. Level B2 would be sufficient to accommodate the mezzanine level proposed under Alternative 3.*

Site during the demolition and excavation phase under Alternative 3. The time period required for construction of Alternative 3 would be slightly less than with the proposed Project; however, the expected buildout date for Alternative 2 would be in 2020, which is the same as the proposed Project.

2. Environmental Impact Analysis

a. Aesthetics, Views, Light and Glare, and Shading

As discussed above, SB 743 amended CEQA and changed the way in which environmental impacts related to aesthetics are addressed in an EIR. Section 21099(d)(1) of the PRC states that the "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." Similar to the proposed Project, as an employment center project located in a TPA, this alternative's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Therefore, the following analysis regarding aesthetics, visual character, views, light and glare, and shading is provided for informational purposes only.

(1) Aesthetics/Visual Quality

(a) Construction

Similar to the proposed Project, Alternative 3 would temporarily alter the visual appearance of the Project Site due to the removal of the existing building and surface parking lot. Other construction activities, including site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures would also alter the visual character and quality of the Project Site and adjacent roadways. These construction activities could be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. However, Alternative 3 would incorporate the same project design features as the proposed Project during construction, including the installation of temporary construction fencing along the periphery of the Project Site that would screen much of the construction activity from view at street level. In addition, any pedestrian walkways and construction fencing accessible to the public would be monitored for graffiti removal throughout the construction period. Overall, similar to the proposed Project, while Alternative 3 would alter the visual character of the Project area on a short-term basis, construction activities would not substantially alter or degrade the existing visual character of the Project Site. Therefore, similar to the proposed Project, impacts related to aesthetics during construction of Alternative 3 would be less than significant.

(b) Operation

Similar to the proposed Project, Alternative 3 would replace the existing two-story low-rise commercial building and surface parking lot on the Project Site with a seven-story multi-use building, thereby altering the visual character of the Project Site. Similar to the proposed Project, Alternative 3 would feature an iconic building design that would add to the eclectic urban environment of the Sunset Strip, where the City also envisions increases in density and height of new development. As with the proposed Project, Alternative 3 would increase the density and height of the development on the Project Site but would be compatible with existing and planned development in the area. Furthermore, similar to the proposed Project, Alternative 3 would be designed with the top two floors stepping down from Sunset Boulevard and with outdoor terraces incorporated on the middle floors to reduce the perceived bulk and mass of the proposed building in addition to having two fewer above-ground stories than the proposed Project. The ground floor of this alternative would also incorporate visually and physically penetrable treatments along the Sunset Boulevard and Hilldale Avenue frontages that feature extensive windows to encourage pedestrian activities and create a human-scale frontage design. Accordingly, similar to the proposed Project, while development of this alternative would alter the visual character of the Project Site, the proposed building under Alternative 3 would not substantially degrade the existing visual character and quality of the Project Site and its surroundings or introduce elements that generate substantial long-term contrast with or substantially detract from the visual character of Sunset Boulevard and the western portion of the Sunset Strip. Therefore, similar to the proposed Project, implementation of Alternative 3 would result in a less-than-significant impact related to aesthetics and visual quality.

(2) Views

Similar to the proposed Project, the introduction of the proposed building under Alternative 3 would result in changes to short-range views of the Project Site. Due to the height and mass of the seven-story building under Alternative 3, changes to short-range views, particularly along the immediately adjacent roadways (i.e., Sunset Boulevard and Hilldale Avenue), would be more substantial than changes to long-range views. Despite having two fewer stories than the proposed Project, this alternative would also be highly visible and would be substantially taller and have more massing than the existing two-story building on the Project Site.

However, as with the proposed Project, long-range views of identified visual resources or scenic vistas would not be affected by the development under Alternative 3 since having two fewer stories than the proposed Project would not be noticeably different when viewed from long-range vantage points. There are no scenic resources located on the Project Site or in the immediate vicinity of the Project Site. Therefore, similar to the

proposed Project, Alternative 3 would not damage or obstruct views of scenic vistas, and impacts to views would be less than significant.

(3) Light and Glare

(a) Construction

Similar to the proposed Project, construction of Alternative 3 would include the same uses as the proposed Project and would be developed in a similar manner as with the proposed Project. Therefore, construction of Alternative 3 would introduce new, temporary sources of light and glare to the Project Site. As with the proposed Project, while the majority of construction would occur during daylight hours, there is a potential that construction could occur in the early evening hours within the permitted hours of construction and require the use of artificial lighting. However, Alternative 3 would incorporate similar project design features as the proposed Project, including the use of construction lighting that would be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. To the extent early evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction activities. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with WHMC light intensity requirements (Section 19.20.100). Therefore, similar to the proposed Project, with adherence to existing WHMC regulations and project design features, light resulting from construction activities would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

In addition, as with the proposed Project, any glare generated from the Project Site during construction would be highly transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary nature of construction activities. Furthermore, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the proposed Project, light and glare associated with the construction of Alternative 3 would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area, and impacts would be less than significant.

(b) Operation

Similar to the proposed Project, Alternative 3 would increase lighting levels within the Project Site and the surrounding area through the introduction of new sources of artificial lighting, including low-level exterior lights adjacent to the proposed building for

security and wayfinding purposes; low-level accent lighting to highlight architectural features, landscape elements, and signage. As with the proposed Project, Alternative 3 proposes a lighting scheme that would utilize low-glare fixtures to provide soft, low-level functional lighting at the building entrance and ramp area and result in minimal lighting influence to all areas surrounding the Project Site. The reduction in luminosity resulting from the alternative's reduced building profile would not be sufficient to be noticeable in comparison to the proposed Project. Lighting at ground level for this alternative and the proposed Project would be the same, particularly along Hilldale Avenue near light-sensitive receptors. Building materials used would also be the same, with resulting similar glare effects. However, Alternative 3 would include a digital billboard that would introduce a new source of artificial lighting that is not proposed under the Project. This digital billboard would comply with the required sign luminance levels established in the City's proposed Sunset Boulevard Off-Site Signage Policy to ensure that lighting levels are consistent with those already existing on or envisioned for the Sunset Strip. Since this digital board would be incorporated into the northern façade of the proposed building under this alternative, no changes to the lighting levels on Hilldale Avenue would occur when compared to the proposed Project. Therefore, similar to the proposed Project, illuminance levels associated with building and site lighting under Alternative 3 would be less than significant.

Additionally, as with the proposed Project, development under Alternative 3 could affect daytime glare conditions with the introduction of a new building and signage at the Project Site. To address daytime glare conditions, Alternative 3 would incorporate similar project design features as the proposed Project, including the use of glass in building façades that is anti-reflective or treated with an anti-reflective coating in order to minimize glare. Thus, development of Alternative 3 would not incorporate substantial amounts of highly reflective building materials or signage that would be highly visible to off-site glare-sensitive uses and would not substantially alter the character of the off-site areas surrounding the Project Site or interfere with the performance of an off-site activity. As discussed above, the digital billboard would comply with the required sign luminance levels established in the City's proposed Sunset Boulevard Off-Site Signage Policy to ensure that lighting levels, including those that may result in daytime glare, are consistent with those already existing on or envisioned for the Sunset Strip. Therefore, similar to the proposed Project, daytime glare under Alternative 3 would be less than significant.

(4) Shading

As discussed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR, the proposed Project would not have a significant shading impact on nearby sensitive receptors. Alternative 3 would construct a seven-story building with similar massing to the proposed Project and the general shading patterns would be similar. Since the proposed building height under Alternative 3 would be lower than the proposed Project,

shading under Alternative 3 would be less than that of the proposed Project and would also be less than significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 3 would involve the same amount of excavation as the proposed Project. As with the proposed Project, construction of Alternative 3 would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. The intensity of air emissions and fugitive dust from excavation, site preparation and construction activities would be the same or similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized emissions on these days would be the same as those of the proposed Project and would be less than significant.

(b) Toxic Air Contaminants

As with the proposed Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the proposed Project would result in less-than-significant impacts with regard to TAC emissions. Therefore, similar to the proposed Project, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Alternative 3 would reduce the total square footage of development on the Project Site from approximately 132,000 square feet as proposed by the Project to approximately 100,000 square feet; however, the reduction in square footage dedicated to the Arts Club uses would not result in an actual reduction in usage as the approximate 16,137 square feet of uses proposed for the Arts Club would merely be relocated to a subterranean level. As discussed below in Subsection V.C.2.j, Traffic, Access, and Parking, the number of net new daily vehicle trips generated by Alternative 3 (1,822 trips) would be less than the number of trips generated by the proposed Project (1,961 trips), as shown in Appendix L of this Draft EIR. Operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas.

Since the amount of mobile source emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 3 would be less than the emissions generated by the proposed Project. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during operation (under both existing and future conditions) would be less than the proposed Project's contribution. Accordingly, regional air quality impacts under Alternative 3 would be less than significant and less than those of the proposed Project.

Localized mobile source operational impacts are determined primarily by peak-hour intersection traffic volumes. As discussed above, the number of net new peak-hour trips generated by Alternative 3 would be less than the trips generated by the proposed Project. In addition, as with the proposed Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the proposed Project did not result in any significant impacts (under both existing and future conditions), localized impacts under Alternative 3 also would be less than significant and would be less than those of the proposed Project.

(b) Toxic Air Contaminants

Similar to the proposed Project, Alternative 3 would not include any substantial TAC sources as defined in the South Coast Air Quality Management District's (SCAQMD) *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005) and the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* (2005). Alternative 3 would result in some TAC emissions, primarily from mobile source emissions, which, as discussed above, would be less than the mobile source emissions generated by the proposed Project. Therefore, TAC impacts would be less than significant under Alternative 3 and less than those of the proposed Project.

c. Geology and Soils

Under Alternative 3, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability, subsidence, expansive soils would be the same as those under the proposed Project because such impacts are a function of the Project Site's underlying geologic conditions. Alternative 3 would be developed within the same site as the proposed Project, on the same geology and soils as the proposed Project, and would comply with the same regulatory requirements as the proposed Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the proposed Project, Alternative 3 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the City of West Hollywood Building

Code. Alternative 3 would also implement the same mitigation measure (Mitigation Measure C-1) as the proposed Project, which requires the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Overall, impacts related to geology and soils under Alternative 3 would be less than significant with mitigation, and such impacts would be similar to those of the proposed Project.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined, in large part, by the number of daily trips generated and energy and water consumption by the proposed land uses. Under Alternative 3, the trip generation and energy and water consumption from proposed land uses would be slightly reduced compared to the proposed Project due to the reduction in the overall square footage of the office component of the proposed development under this alternative, as shown in Table V-2 on page V-31. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the proposed Project. As with the proposed Project, Alternative 3 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance and CALGreen. With compliance with the City's Green Building Ordinance and the implementation of comparable sustainability features as the proposed Project, it is anticipated that Alternative 3 would be consistent with the GHG reduction goals and objectives included in City's Climate Action Plan and state and regional regulatory plans. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant and less than those of the proposed Project.

e. Hazards and Hazardous Materials

As with the proposed Project, Alternative 3 would require the use of products for construction and operations that are routinely used in performing everyday household and retail activities consistent with regulatory requirements. This alternative would not require the use of hazardous materials beyond these routinely used products. Similar to the proposed Project, Alternative 3 would comply with applicable regulations regarding the storage, generation, handling, and disposal of hazardous materials. Furthermore, construction and operation of Alternative 3 would not expose persons to substantial risk resulting from the release of hazardous materials or from exposure to a health hazard in excess of regulatory standards or interfere with existing or projected future emergency response capacity to the Project area. Therefore, similar to the proposed Project, impacts related to hazards and hazardous materials under Alternative 3 would be less than significant during construction and operation of the proposed development.

f. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

Similar to the proposed Project, construction activities under Alternative 3 would require grading and excavation that would have the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site by diverting existing surface flows as a result of exposing underlying soils and making the Project Site temporarily more permeable. However, as with the proposed Project, Alternative 3 would be required to comply with all applicable City grading permit regulations, including, but not limited to, the City's Green Building Ordinance and WHMC requirements, that require necessary measures, plans, and inspections to reduce flooding, sedimentation, and erosion. In addition, through implementation of BMPs consistent with the NPDES General Construction Activity Permit, implementation of a LSWPPP, and compliance with applicable City grading regulations, construction of Alternative 3 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. Similarly, adherence to standard compliance measures during construction activities would ensure that Alternative 3 would not cause flooding that would have the potential to harm people or damage property or sensitive biological resources, substantially reduce or increase the amount of surface water flow from the Project Site into a water body, result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direction of water flow during construction, or result in runoff water that would exceed the capacity of existing or planned stormwater drainage systems. As such, similar to the proposed Project, construction-related impacts to surface water hydrology under Alternative 3 would be less than significant.

(b) Operation

Alternative 3 would result in the same reduction of impervious area as the proposed Project (i.e., from 99 percent to 95 percent). Accordingly, similar to the proposed Project, the change in stormwater peak flow rate is negligible and would remain at 1.57 cubic feet per second (cfs). As with the proposed Project, Alternative 3 would provide either a capture and reuse system or a biofiltration system to manage stormwater flows. As such, Alternative 2 would not result in any incremental impact on either on-site or off-site flooding during a 50-year storm event, substantially reduce or increase the amount of surface water in a water body, or create or contribute runoff water that would exceed the capacity of the storm drain system. Furthermore, Alternative 3 would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation, or flooding on- or off-site. As such, similar to the proposed Project, operation of Alternative 3 would result in a less-than-significant impact on surface water hydrology.

(2) Surface Water Quality

(a) Construction

Similar to the proposed Project, construction activities, such as earth moving, maintenance/operation of construction equipment, pavement grinding, and handling/storage/disposal of materials, associated with Alternative 3 could contribute to pollutant loading in stormwater runoff. However, Alternative 3 would incorporate similar project design features as the proposed Project, including Project Design Feature F-3 related to the preparation of an LSWPPP and an ECP to identify potential pollutant sources that may affect the quality of discharge associated with construction activity, identify non-stormwater discharges, and recommend means and methods to effectively prohibit the entry of pollutants into the public storm drain system during construction. As with the proposed Project, through implementation of the LSWPPP and ECP, and City grading regulations, including the implementation of BMPs, construction of Alternative 3 would not result in discharge that would create pollution that would alter the quality of the water of the state (i.e., Ballona Creek and Santa Monica Bay) to a degree, which unreasonably affects beneficial uses of the waters; contaminate the quality of the water of the state by waste to a degree, which creates a hazard to the public health through poisoning or through the spread of diseases; or create a nuisance that would be injurious to health, affect an entire community or neighborhood or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of Alternative 3 would not result in discharges that would provide substantial additional sources of polluted runoff, cause regulatory standards to be violated in Santa Monica Bay, or substantially degrade water quality. As such, similar to the proposed Project, construction-related impacts to surface water quality under Alternative 3 would be less than significant.

(b) Operation

Similar to the proposed Project, with the implementation of an approved LID Plan, including either a capture and reuse system or biofiltration BMP in the form of pre-cast hard bottom stormwater planter structures with layers of mulch, soil, and gravel (which would filter and treat stormwater, removing pollutants though a variety of physical, biological, and chemical treatment processes, before discharging the stormwater via an underdrain into the public infrastructure), operation of Alternative 3 would not provide substantial additional sources of polluted runoff or result in discharges that would cause pollution that would alter the quality of the waters of the state (i.e., Ballona Creek and Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; contaminate the quality of the waters of the state by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or create a nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes.

Furthermore, operation and maintenance of the LID features under Alternative 3 would not result in discharges that would violate any water quality standards or waste discharge requirements or substantially degrade surface water quality. Therefore, similar to the proposed Project, impacts to surface water quality under Alternative 3 would be less than significant and beneficial in comparison to existing conditions.

(3) Groundwater Hydrology

(a) Construction

Development of Alternative 3 would include subterranean levels that would reach approximately 72 feet below Sunset Boulevard at its lowest point, and required excavation would reach a depth of approximately 79 feet below Sunset Boulevard at its lowest point. Similar to the proposed Project, since the historic high groundwater elevation at the Project Site was found to be approximately 22 feet and groundwater was encountered in borings at a depth of 36 feet, groundwater may be encountered during excavation activities associated with Alternative 3, and temporary dewatering may be required within the Project Site. As with the proposed Project, in the event that temporary dewatering is required, a small amount of groundwater would be removed during excavation, but only until such time as waterproofing is installed up to the groundwater table. Any discharge of groundwater during construction of the proposed Project would occur pursuant to, and comply with, the applicable permit requirements of a General NPDES Permit issued by the LARWQCB. Groundwater shall only be discharged to the storm drain system, not to the City-owned sewer system. Therefore, if dewatering is required, operation of the temporary dewatering system would have a minimal effect on local groundwater recharge in the vicinity of the Project Site. Accordingly, similar to the proposed Project, Alternative 3 is not anticipated to adversely impact the flow rate or direction of groundwater and would not have an adverse effect on any water supply wells. Therefore, construction of Alternative 3 would not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, deplete groundwater supplies, result in a demonstrable and sustained reduction of groundwater recharge capacity, or interfere with groundwater recharge. As such, similar to the proposed Project, impacts related to groundwater hydrology under Alternative 3 would be less than significant.

(b) Operation

Similar to the proposed Project, due to the depth of excavation associated with Alternative 3, groundwater may be encountered. In lieu of a permanent dewatering system, the building's foundation would be designed in a manner as to support the proposed structure in saturated soils conditions. This foundation design would result in only minor impacts to the top of the groundwater table and would not affect any supply

wells. Therefore, as with the proposed Project, operation of Alternative 3 would not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity. As such, similar to the proposed Project, impacts related to groundwater hydrology under Alternative 3 would be less than significant.

(4) Groundwater Quality

(a) Construction

Similar to the proposed Project, during on-site grading and building construction, the use of hazardous materials, such as fuels, paints, solvents, and concrete additives, would require proper management and, in some cases, disposal to minimize, if not avoid, the releases of hazardous materials into groundwater. As with the proposed Project, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential for the construction of Alternative 3 to release contaminants into the groundwater that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within 1 mile of the Project Site, construction activities would not be anticipated to affect existing wells. Accordingly, similar to the proposed Project, construction impacts on groundwater quality under Alternative 3 would be less than significant.

(b) Operation

Similar to the proposed Project, Alternative 3 proposes a capture and reuse system or a biofiltration system to treat stormwater runoff to minimize, if not avoid, potential impacts to groundwater. Surface contaminants also have the potential to adversely impact the quality of groundwater. As with the proposed Project, operation of Alternative 3 would involve the limited use of potentially hazardous materials typical of those used in commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into the groundwater. However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. As with the proposed Project, compliance with all applicable federal, state, and local requirements, concerning the handling, storage and disposal of hazardous waste, would reduce the potential for operation of Alternative 3 to release contaminants into the groundwater that could affect existing contaminants, expand the area

or increase the level of groundwater contamination, cause a violation of regulatory water quality standards at an existing production well, or otherwise substantially degrade groundwater quality. Accordingly, similar to the proposed Project, impacts on groundwater quality under Alternative 3 would be less than significant.

g. Land Use

Alternative 3 would develop the same uses as the proposed Project at a reduced density and height. However, Alternative 3 would require the same discretionary approvals as the proposed Project. The new building proposed by Alternative 3 and its various uses would be placed within the same building footprint as the proposed Project. Similar to the proposed Project, with approval of the requested discretionary approvals and implementation of the project design features that would be incorporated into the proposed Project (which are discussed elsewhere in this Draft EIR), Alternative 3 would be consistent with the overall intent of the applicable goals and objectives of the SSP and the WHMC requirements and applicable regional plans. As with the proposed Project, Alternative 3 would help serve many goals and policies under the General Plan and the SSP by: (1) contributing to the maintenance of Sunset Boulevard as a regional, national, and international destination for entertainment, and the primary economic engine to the City; (2) adding to the eclectic urban environment by creating a building that enhances the Sunset Boulevard experience and its dynamic urban environment characterized by widely-know entertainment destinations; (3) providing new commercial, retail, restaurant, and entertainment uses in an area well-served by public transit; (4) increasing density and height compatible with the City's vision to strengthen the attractiveness and the economic viability of the western portion of Sunset Boulevard; (5) increasing the pedestrian experience and activity in the western portion of Sunset Boulevard; and (6) incorporating environmentally sustainable features and construction protocols to reduce energy and water usage and waste to reduce GHG emissions and help minimize the impact on natural resources and infrastructure;. In addition, Alternative 3 would include a digital billboard that would comply with the requirements established in the City's proposed Sunset Boulevard Off-Site Signage Policy to ensure that the proposed signage under this alternative is consistent with those already existing on or envisioned for the Sunset Strip. More specifically, the proposed digital billboard would be consistent with the following elements of the proposed Sunset Boulevard Off-Site Signage Policy: (1) promote innovative media, off-site advertising, technology and architectural excellence to create iconic urban design; (2) support excellent building design with thoughtfully integrated off-site advertising that focuses on non-standard and innovative media formatting; (3) support sustainable design with requirements that equal or exceed Title 24 requirements for offsetting new energy usage; (4) orient digital billboards as vertical displays to reduce visual clutter and support coordinated programming with unique site-specific advertising and art; and (5) locate and design digital billboards so as not to cause light and glare impacts on neighboring uses.

Thus, similar to the proposed Project, impacts related to land use consistency under Alternative 3 would be less than significant.

Alternative 3 includes the same types of uses as the proposed Project, including retail space, an art gallery, creative offices, as well as guestrooms, restaurants, lounges, and bars to support the Arts Club. These uses would be compatible with and would complement existing and future development on the Sunset Strip and would not substantially or adversely change the existing land use relationships between the Project Site and adjacent land uses. As noted in Section IV.H, Land Use, of this Draft EIR, the Project Site is located in a highly urbanized area with a variety of commercial, retail, restaurant, and cultural and entertainment-related uses including widely-known destination night clubs and music venues such as The Roxy Theatre, Whisky A Go Go, and the Viper Room. As with the proposed Project, Alternative 3 would revitalize the Project Site by building a high quality commercial development that provides a variety of uses that would enhance and support the community's vision of the Sunset Strip as a high-quality international entertainment destination. In addition, Alternative 3 would provide for retail uses, employment opportunities, an art gallery, and other urban uses supportive of the surrounding area and the City, although not to the same extent as the proposed Project. Alternative 3 would reduce the amount of square footage dedicated to the creative office uses in comparison to the proposed Project, and, therefore, it would not generate the same number of employees to benefit area businesses and support the local economy.

Similar to the proposed Project, Alternative 3 would be compatible with the types of land uses in the vicinity of the Project Site, and impacts associated with land use compatibility would be less than significant.

h. Noise

(1) Construction

Alternative 3 would involve the same general phases of construction as the proposed Project (i.e., site grading and excavation, building construction, and finishing/landscape installation). As with the proposed Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips, in close proximity to sensitive receptors. Under Alternative 3, on- and off-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days to those of the proposed Project. Thus, noise and vibration levels during maximum activity days, which are used for measuring noise impact significance, would be similar to those of the proposed Project. As with the proposed Project, Alternative 3 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures to reduce noise and vibration levels during construction to the extent

feasible. Similar to the proposed Project, with implementation of mitigation measures, on-site vibration impacts associated with potential building damage would be reduced to a less-than-significant level under Alternative 3. However, similar to the proposed Project, construction of Alternative 3 would result in significant and unavoidable on-site noise and vibration impacts (related to human annoyance) during construction. As with the proposed Project, construction of Alternative 3 would also result in a cumulative significant and unavoidable on-site noise impact in the event the construction of Related Project No. 43, which is located immediately west of the Project Site, occurs simultaneously with Alternative 3 due to the presence of sensitive receptors immediately south of the Project Site and Related Project No. 43.

(2) Operation

As described in Section IV.H, Noise, of this Draft EIR, sources of operational noise include on-site stationary noise sources, such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor areas (e.g., pool deck, terraces, landscaped plaza, etc.), parking facility, and loading dock/trash collection area, and off-site mobile (roadway traffic) noise sources. As with the proposed Project, new mechanical equipment (e.g., air ventilation equipment) under Alternative 3 would be located on the roof level and in the interior of the building. Alternative 3 would incorporate similar project design features as the proposed Project, including Project Design Feature H-3, which will enclose or screen all outdoor mounted mechanical equipment from off-site noise-sensitive receptors. In addition, Alternative 3 would include outdoor spaces within the Project Site in areas similar to the proposed Project and at similar distances from off-site noise sensitive receptors. Noise sources emanating from the rooftop deck would be located slightly closer to noise sensitive receptors due to the reduced height of the building. Overall, however, noise levels associated with activities within the outdoor spaces would be similar to those of the proposed Project. The proposed loading dock and trash collection areas for Alternative 3 would also be located in the same location as the proposed Project and Alternative 3 would require the similar amounts of service by loading vehicles and trucks as with the proposed Project. Thus, noise impacts from loading dock and trash collection areas would also be the same as, or similar to, the proposed Project. Alternative 3 would provide the same number of parking spaces as the proposed Project, which would result in the same potential noise levels associated with a parking facility as with the proposed Project. As such, similar to the proposed Project, on-site noise under Alternative 3 would be less than significant.

With regard to off-site noise sources, Alternative 3 would result in a reduction in daily vehicle trips (139 fewer trips) compared to the proposed Project as discussed below in Subsection V.C.2.j. However, this reduction in vehicle trips is minimal and would not change the off-site traffic-related noise levels generated by the proposed Project. As with the proposed Project, when compared with existing conditions, Alternative 3 would result in

a maximum of 6.5 dBA (CNEL) increase in traffic noise along Hilldale Avenue (south of Sunset Boulevard). As with the proposed Project, at other analyzed roadway segments, the traffic-related noise levels caused by Alternative 3 would not result in a measurable increase. Thus, the estimated increase in traffic-related noise levels as compared to existing conditions would be above the 5-dBA CNEL significance threshold. Therefore, traffic noise impacts resulting from Alternative 3 in comparison to existing conditions would be significant. However, as with the proposed Project, traffic noise levels are expected to increase in the surrounding area by the time Alternative 3 is constructed (i.e., 2020, the expected buildout year) due to ambient growth and the development of other projects in the vicinity. As such, under future traffic-related noise levels, Alternative 3 would result in a maximum increase of up to only 2.3 dBA (CNEL) along Hilldale Avenue (south of Sunset Boulevard) under those future conditions. At other analyzed roadway segments, the increase in traffic-related noise levels would be negligible (i.e., 0.1 dBA or lower). The increase in traffic noise levels would be well below the relevant 3-dBA CNEL significance threshold under future conditions. Therefore, similar to the proposed Project, off-site noise impacts would be less than significant under future conditions.

Under Alternative 3, Project-level operational noise from off-site mobile sources would exceed the 5-dBA significance threshold along Hilldale Avenue (south of Sunset Boulevard), in comparison to existing conditions. In addition, the alternative's contribution to cumulative operational noise impacts due to off-site mobile sources would be similar to that of the proposed Project since the peak-hour traffic volumes generated by Alternative 3 (100 trips during the A.M. peak hour and 139 trips during the P.M. peak hour) would not be substantially less than those of the proposed Project (122 trips during the A.M. peak hour and 159 trips during the P.M. peak hour), as shown in Appendix L of this Draft EIR. Therefore, similar to the proposed Project, Alternative 3 would also result in a significant and unavoidable operational noise impacts from off-site traffic.

i. Public Services

(1) Police Protection

(a) Construction

The types of construction activities under Alternative 3 would be similar to those under the proposed Project. Accordingly, the potential for theft and vandalism during construction activities at the Project Site would be the same as the proposed Project. As with the proposed Project, Alternative 3 would incorporate similar project design features as the proposed Project during construction, including Project Design Feature I.1-1, which involves implementation of temporary security measures, such as fencing, lighting, and locked entry to secure the Project Site during construction. Therefore, similar to the

proposed Project, potential impacts associated with theft and vandalism during construction of Alternative 3 would be less than significant.

Similar to the proposed Project, construction activities under Alternative 3 could also potentially impact LACSD police protection services and response times within the West Hollywood Station service area due to construction impacts on the surrounding roadways. As with the proposed Project, access to the Project Site and the surrounding area could be impacted by construction-related activities, such as temporary lane closures, and the generation of traffic resulting from construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the proposed Project, a Construction Management Plan will be implemented during construction of Alternative 3 pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Elements of the Construction Management Plan will be implemented to provide temporary traffic controls to direct traffic around any closures (e.g., signs, delineators, etc.) and improve traffic flow of adjacent rights-of-way and public roadways, as well as to ensure pedestrian safety. Accordingly, upon implementation of Project Design Feature J-1 and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LACSD to serve the Project Site. As with the proposed Project, construction of Alternative 3 would not necessitate the provision of new or physically altered government facilities in order to maintain the LACSD's capability to serve the Project Site. As such, Alternative 3 would not result in adverse physical impacts associated with the need and construction of new or altered facilities. Therefore, similar to the proposed Project, construction-related impacts to police protection services under Alternative 3 would be less than significant.

(b) Operation

As with the proposed Project, Alternative 3 would increase the amount of visitors and employees on the Project Site and increase the police service population in the West Hollywood Station service area. This increased demand in police protection services would be slightly reduced compared to the proposed Project due to the slight reduction in the square footage of the office component of the proposed development under this alternative. Similar to the proposed Project, Alternative 3 would incorporate numerous design features, including, but not limited to, private on-site security, club member and guess access controls, and sufficient lighting, to enhance safety within and immediately surrounding the Project Site. In addition to the implementation of these project design features, as with the proposed Project, Alternative 3 would also generate revenues to the City's General Fund, which would continue to support funding dedicated to public safety and LACSD and police services. Such funds would also be used towards staff development, supplies and equipment, and other programs and outreach implemented by the LACSD. The project

design features identified above, as well as this alternative's contribution to the General Fund, would help offset the increase in demand for LACSD police services under Alternative 3. Therefore, similar to the proposed Project, impacts on police services under Alternative 3 would be less than significant.

Similar to the proposed Project, traffic generated by Alternative 3 would have the potential to increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by the additional traffic. However, as with the proposed Project, the incremental increase in delay with the addition of Alternative 3 traffic is not expected to exceed significance thresholds. In addition, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Accordingly, operation of Alternative 3, including its traffic generation, would not cause a substantial increase in emergency response times due to traffic congestion. Therefore, similar to the proposed Project, impacts on emergency response times under Alternative 3 would be less than significant.

(2) Fire Protection

(a) Construction

Similar to the proposed Project, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the proposed Project, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

Similar to the proposed Project, construction activities under Alternative 3 could also potentially impact the provision of LACFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. As with the proposed Project, access to the Project Site and the surrounding vicinity could be impacted by construction-related activities, such as temporary lane closures, and the generation of traffic resulting from construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the proposed Project, a Construction Management Plan will be implemented during construction of Alternative 3 pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. As with the proposed Project, construction of Alternative 3 would not create capacity or service level problems or result in substantial adverse physical impacts associated with the

provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, similar to the proposed Project, impacts to fire protection and emergency medical services during construction of Alternative 3 would be less than significant.

(b) Operation

As with the proposed Project, Alternative 3 would increase the amount of visitors and employees on the Project Site and would, therefore, contribute to an increase in demand for LACFD fire protection and emergency medical services. However, as with the proposed Project, Alternative 3 would be located within close proximity of Fire Station No. 7. In addition, similar to the proposed Project, Alternative 3 would implement all applicable Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Alternative 3 would also implement applicable design features regarding high-rise structures in accordance with the City's Fire Code. Furthermore, as with the proposed Project, Alternative 3 would include the installation of automatic fire sprinklers throughout the proposed building, which would reduce the demand placed on the LACFD.

In addition, similar to the proposed Project, Alternative 3 would also submit an emergency response plan for LACFD approval. Emergency access also would be maintained on-site in accordance with Fire Code requirements. Driveway and internal circulation would be designed to incorporate all applicable County Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

As with the proposed Project, Alternative 3 would be required to meet LACFD fire flow requirements. Furthermore, Alternative 3 would generate revenues to the City's General Fund, which would continue to support the funding of fire protection services, fire prevention, and public safety outreach performed by the LACFD. Therefore, similar to the proposed Project, overall impacts with regard to LACFD fire protection during operation of Alternative 3 would be less than significant.

j. Traffic, Access, and Parking

SB 743 amended CEQA to streamline environmental review for several categories of development projects, including the development of infill projects in transit priority areas (TPA). Among other things, under SB 743 and PRC Section 21099(d)(1), parking impacts are not considered significant impacts under CEQA if a project is a residential, mixed-use residential, or employment center project and is located on an infill site within a TPA. As

with the proposed Project, Alternative 3 is considered an employment center project on an infill site within a TPA. Accordingly, as an employment center project located in a TPA, Alternative 3 is one of several types of projects whose parking impacts shall not be considered significant impacts on the environment. Therefore, the analysis regarding this alternative's parking is provided for informational purposes only.

(1) Construction

As with the proposed Project, construction of Alternative 3 would generate additional trips from heavy-duty construction equipment, haul trucks, and construction workers. As discussed above, Alternative 3 would involve the same amount of excavation as with the proposed Project, and, therefore, the maximum daily haul truck trips and construction worker trips would be the same on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, traffic impacts on these days would be similar to those of the proposed Project. As with the proposed Project, Alternative 3 would incorporate Project Design Feature J-1, which entails implementation of a Construction Management Plan to ensure that the majority of haul truck activity to and from the Project Site would occur outside of the A.M. and P.M. peak hours. In addition, worker trips to and from the Project Site would also occur outside of the peak hours. Therefore, similar to the proposed Project, peak-hour construction traffic impacts under Alternative 3 are expected to be less than significant during construction.

Similar to the proposed Project, construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. As with the proposed Project, adjacent to the Project Site, the curb lanes on Sunset Boulevard and Hilldale Avenue would be used intermittently throughout the construction period for equipment staging, concrete pumping, etc. The use of the public right-of-way along Sunset Boulevard and Hilldale Avenue would require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed. As identified in the Construction Management Plan, temporary controls will be provided to direct traffic and pedestrians around any closures and ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead coverings). Therefore, similar to the proposed Project, impacts related to traffic and pedestrian access would be less than significant.

There are no bus stops adjacent to the Project Site, and, therefore, no temporary impacts to transit are expected. Parking is allowed on both Sunset Boulevard and Hilldale Avenue (during certain hours of the day) adjacent to the Project Site; consequently, similar to the proposed Project, the installation of construction fences under Alternative 3 could result in the temporary loss of up to four on-street metered parking spaces on Sunset

Boulevard and up to three on-street metered parking spaces on Hilldale Avenue. As with the proposed Project, construction of Alternative 3 is not expected to create hazards for roadway travelers, bus riders, or people utilizing on-street parking spaces, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) would be incorporated into the Construction Management Plan, included as Project Design Feature J-1. Construction-related impacts associated with access and transit would be less than significant, and the implementation of Project Design Feature J-1 would further reduce those impacts.

Based on the above, similar to the proposed Project, impacts to traffic, access, and parking during construction under Alternative 3 would be less than significant.

(2) Operation

Alternative 3 would reduce the amount of square footage of the office component of the proposed development compared to the proposed Project. Accordingly, Alternative 3 would generate approximately 1,822 net daily trips, which would result in 139 fewer daily trips, 22 fewer A.M. peak-hour trips, and 20 fewer P.M. peak-hour trips than the proposed Project, as shown in Appendix L of this Draft EIR. As such, impacts to the intersection level of service and the regional transportation system would be reduced compared to the proposed Project, which were determined to be less than significant. Therefore, impacts to intersection level of service and the regional transportation system would be less than significant under Alternative 3 and would be less than those of the proposed Project.

With regard to access and circulation; bicycle, pedestrian, public transit, and vehicular safety; and parking, Alternative 3 proposes the same access and circulation scheme and would provide the same number of parking spaces as the proposed Project. Therefore, impacts to access and circulation; bicycle, pedestrian, and vehicular safety; and parking under Alternative 3 would be similar to those of the proposed Project and would be less than significant.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the proposed Project, construction activities under Alternative 3 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other

short-term related activities. These activities would occur incrementally throughout construction of Alternative 3 (from the start of construction to buildout of Alternative 3 in 2020). As with the proposed Project, the amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, water use during construction would be anticipated to be less than the net new water consumption of Alternative 3 at buildout. In addition, water use during construction would be short-term and have an intermittent demand only for water during construction activities and would be somewhat offset by the water currently consumed by the existing commercial building, which would be removed. As with the proposed Project, construction activities under Alternative 3 would require minimal water demand and are not anticipated to have a substantial adverse impact on available water supplies or infrastructure. In addition, off-site construction impacts would be temporary in nature and would not disrupt water service. As such, similar to the proposed Project, construction-related impacts to water supply under Alternative 3 would be less than significant.

In addition, similar to the proposed Project, the existing water infrastructure would be adequate to provide for the water flow necessary to serve the proposed development under Alternative 3. Minor off-site construction work associated with trenching would occur, resulting in partial street closures along Sunset Boulevard and/or Hilldale Avenue adjacent to the Project Site. However, such closures would be temporary in nature and would not result in a substantial inconvenience to motorists or pedestrians, who would have additional options for navigating around the construction activities. Furthermore, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, a Construction Management Plan will be implemented during construction activities pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Overall, construction activities associated with Alternative 3 would not require or result in the construction of new water facilities or expansion of existing facilities, except for the new service connections to connect to the mainlines. In addition, the water distribution capacity would be adequate to serve the proposed development under Alternative 3. Furthermore, off-site construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or inconvenience to motorists or pedestrians. As such, similar to the proposed Project, construction-related impacts to water infrastructure under Alternative 3 would be less than significant.

(b) Operation

As with the proposed Project, Alternative 3 would develop a multi-use development on the Project Site, including publicly-accessible retail space, an art gallery, and creative offices, as well as a variety of uses for members and guests of the Arts Club, including restaurants, lounges, bars, screening rooms, a supper club, fitness/spa facilities, and guestrooms. However, Alternative 3 would reduce the square footage related to the

creative office space by 13,112 square feet. Therefore, while Alternative 3 would generate an increase in demand for water compared to existing conditions, such demand would be approximately 7 percent less than the proposed Project. Since the estimated net water demand of the proposed Project for the City of Beverly Hills service area was found to be within its available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040, based on the City of Beverly Hills' UWMP, the same would be true for Alternative 3. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be lower than that of the proposed Project. Thus, impacts to water supply and water infrastructure under Alternative 3 would be less than significant and would be less than those of the proposed Project.

(2) Wastewater

(a) Construction

Similar to the proposed Project, during construction of Alternative 3, existing sewer laterals would be capped, and no sewage would enter the public sewer system. Temporary facilities (such as portable toilet and hand wash areas) will be provided by the contractor at the Project Site. Sewage from these temporary facilities will be collected and hauled off-site to a waste treatment facility and not discharged into the public sewer system. As such, wastewater generation from proposed construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, similar to the proposed Project, construction of Alternative 3 is not anticipated to substantially or incrementally exceed the future scheduled capacity of the HTP or any other wastewater treatment plant.

Additionally, construction activities associated with the installation of new or relocated sewer line connections would be confined to trenching in order to place the sewer lines below surface. Such activities would be coordinated through the City so as not interrupt existing service to other users. Therefore, similar to the proposed Project, construction activities are not anticipated to have any adverse impact on wastewater conveyance or treatment infrastructure, and impacts would be less than significant.

(b) Operation

As with the proposed Project, Alternative 3 would develop a multi-use development on the Project Site, including publicly-accessible retail space, an art gallery, and creative offices, as well as a variety of uses for members and guests of the Arts Club, including restaurants, lounges, bars, screening rooms, a supper club, fitness/spa facilities, and guestrooms. However, Alternative 3 would reduce the square footage related to the creative office space by 13,112 square feet. Therefore, while Alternative 3 would generate an increase in wastewater generation compared to existing conditions, this estimated

wastewater generation and wastewater flow would be approximately 7 percent less than the proposed Project. Thus, it can be reasonably concluded that since the proposed Project-generated wastewater would be accommodated by the existing capacity of the HTP, the wastewater generated by Alternative 3, which would be less than the proposed Project, would also be accommodated by the existing capacity of the HTP. As such, impacts related to wastewater generation under Alternative 3 would be less than significant and would be less than those of the proposed Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 3 would involve demolition and building construction activities. Alternative 3 would also remove the existing commercial building, surface parking lot, and subterranean parking on the Project Site to construct a multi-use development similar to the proposed Project, but at a slightly reduced density. Thus, the amount of demolition and construction waste generated by Alternative 3 would be similar to the proposed Project. Alternative 3 would implement similar project design features as the proposed Project and would be required to prepare and implement a Construction and Demolition Waste Management Plan to comply with the requirements of the WHMC. As with the proposed Project, specific project design features would include implementation of waste reduction measures to promote source reduction and recycling, consistent with AB 939 and other applicable state and local statutes. Given that the demolition and construction waste would be similar to the proposed Project, it is reasonable to assume that construction of Alternative 3 would not conflict with any of the solid waste policies and objectives of the State or City of West Hollywood. As such, similar to the proposed Project, solid waste impacts during construction under Alternative 3 would be less than significant.

(b) Operation

As with the proposed Project, Alternative 3 would develop a multi-use development on the Project Site, including publicly-accessible retail space, an art gallery, and creative offices, as well as a variety of uses for members and guests of the Arts Club, including restaurants, lounges, bars, screening rooms, a supper club, fitness/spa facilities, and guestrooms. However, Alternative 3 would reduce the square footage related to the creative office space by approximately 13,112 square feet. Therefore, while Alternative 3 would result in an increase in solid waste generation compared to existing conditions, this estimated solid waste generation would be less than 1 percent less than the proposed Project. Thus, it can be reasonably concluded that since the proposed Project's solid waste disposal demands could be met without the need for additional landfill capacity, solid waste disposal demands by Alternative 3, which would be slightly less than the proposed Project, would also be met without the need for additional landfill capacity. As such,

impacts related to solid waste generation under Alternative 3 would be less than significant and would be less than those of the proposed Project.

(4) Energy

(a) Construction

Similar to the proposed Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Construction of Alternative 3 would involve similar demolition and building construction activities as the proposed Project. As with the proposed Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Therefore, similar to the proposed Project, impacts on energy resources associated with short-term construction activities under Alternative 3 would be less than significant.

(b) Operation

As with the Project, Alternative 3 would develop a multi-use development for use on the Project Site, including publicly-accessible retail space, an art gallery, and creative offices, as well as a variety of uses for members and guests of the Arts Club, including restaurants, lounges, bars, screening rooms, a supper club, fitness/spa facilities, and guestrooms. However, Alternative 3 would reduce the square footage related to the creative office space by 13,112 square feet. In addition, as previously discussed, Alternative 3 would generate 1,822 net daily vehicle trips compared to the 1,961 net daily trips generated by the proposed Project. Thus, while Alternative 3 would generate an increase in energy consumption (i.e., electricity, natural gas, and petroleum-based fuels) compared to existing conditions, this estimated energy consumption would be less than the proposed Project. Furthermore, similar to the proposed Project, Alternative 3 would implement similar sustainability project design features as the proposed Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the proposed Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. Therefore, impacts to energy resources under Alternative 3 would be less than significant and would be less than those of the proposed Project.

3. Comparison of Impacts

As evaluated above, Alternative 3 would not eliminate the proposed Project's significant and unavoidable impacts related to on-site construction noise impacts (both

Project-level and cumulative conditions), and on-site construction vibration impacts (related to human annoyance). In addition, both: (1) Project-level off-site traffic noise during operation in comparison to existing conditions (rather than future conditions which would take into account increased noise levels due to ambient growth in the area) under Alternative 3; and (2) cumulative off-site traffic noise during operation under Alternative 3 would each exceed the 5-dBA significance threshold, specifically along Hilldale Avenue (south of Sunset Boulevard) since the peak-hour traffic volumes generated by Alternative 3 would not be substantially less than those of the proposed Project. Alternative 3's impacts related to operation, including aesthetics/ visual quality, views, light and glare; air quality during construction; geology and soils; hazards and hazardous materials; hydrology and water quality; land use; noise; access and parking; and public services (police protection and fire protection would be similar to those under the proposed Project. However, these same impacts of the Proposed Project are already less than significant and would not be eliminated with this alternative. Shading, air quality during operation, GHG emissions, traffic, utilities and service systems (water consumption, wastewater generation, solid waste generation, and energy consumption) would be slightly less than those under the proposed Project due to the reductions in square footage dedicated to the creative office use and would also be less than significant.

4. Relationship of the Alternative to Project Objectives

Overall, Alternative 3 represents a reduced scope of development compared to the proposed Project due to the reduction in the proposed creative office space and building height. Notwithstanding, Alternative 3 would achieve some of the Project objectives to the same extent as the proposed Project. Specifically, Alternative 3 would achieve the following objectives to a similar extent as the proposed Project:

- Add to the diversity of visitor-serving uses available on the Sunset Strip.
- Provide a central location where creative and entrepreneurial patrons come together to meet, exchange ideas, dine, and participate in various cultural events.
- Develop a unique cultural use, which would contribute to the City's economy with an entertainment and creative arts-related venue that includes restaurants, bars, and hospitality uses.
- Enhance the pedestrian connections and activity along Sunset Boulevard through the development of an open and inviting building façade at the sidewalk level featuring a landscaped community plaza that engages the street and the neighborhood community.

- Contribute to and expand the diversity of iconic entertainment and cultural venues on the Sunset Strip.

- Support the community's vision of the Sunset strip as a high-quality international entertainment destination.

- Add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment.

- Complement the diverse mix of architectural styles, building heights, and uses along Sunset Boulevard.

- Revitalize an under-utilized commercial property in the heart of the Sunset Strip.

In addition, Alternative 3 would achieve the following Project objectives, but not to the same extent as the proposed Project as a result of the reduction in the square footage of the Arts Club uses and creative office use:

- Maximize opportunities for a mix of retail, art gallery, creative offices, entertainment, hospitality, dining, bars, and guestrooms that would further the Sunset Specific Plan's goals to develop the area with a diversity of uses that support daytime and nighttime populations, along with goods and services for City residents.

- Construct an energy-efficient and environmentally conscious building by incorporating sustainable elements of design, construction, and operation to achieve Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council or satisfy equivalent green building standards.

- Provide significant new creative office space to enhance the City's supply of modern office environments that cater to and respond to the existing and future needs of businesses that will support the economic future and vitality of the City.

- Maximize the number of new permanent jobs generated by the addition of new creative offices, restaurant and retail space, arts gallery and entertainment uses, bars, guestrooms, and fitness and spa facilities, helping to secure a strong and continuous tax base and supply the region with greater employment options.

Furthermore, Alternative 3 would not fully achieve the proposed Project's underlying purpose of maximizing the development potential on the Project Site through the development of a high quality commercial project, including creative office space due to the reduction in square footage of the creative offices.

In addition, Alternative 3 would not eliminate the proposed Project's significant and unavoidable impacts related to noise and vibration. Specifically, similar to the proposed Project: (1) construction-period noise and vibration impacts (related to human annoyance) at the project-level would be significant and unavoidable; (2) cumulative noise impacts during construction (in the event the construction of Related Project No. 43 occurs simultaneously with Alternative 2) would be significant and unavoidable; and (3) operational off-site noise impacts, including project-level and cumulative noise impacts, would be significant and unavoidable. This is because on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days to those of the proposed Project and due to the same construction methods being employed, the duration and extent of construction, and the proximity to sensitive receptors as those of the proposed Project and off-site traffic noise during operation would be similar to the proposed Project since peak-hour trip volumes generated by Alternative 3 would only be slightly less than those of the proposed Project and would not be sufficient to reduce noise levels below the 5-dBA significance threshold.

V. Alternatives

D. Alternative 4: Office/3-Story Alternative

1. Description of the Alternative

The Office/3-Story Alternative would include the development of office uses and ground floor commercial/retail uses, including a partial subterranean gym/fitness center on Level B1 that conforms to the existing zoning requirements. This alternative would be developed pursuant to the SSP's allowable base floor area ratio (FAR) of 1.5 and zoning designations and would not involve any amendments to the SSP, General Plan, or the City of West Hollywood Zoning Map (Zone Map).

Under existing zoning regulations, a 30,361–square foot building 40 feet in height could be constructed on the Project Site with an average setback of 15 feet pursuant to the SSP.

As shown in Figure V-3 on page V-90, Alternative 4 would include the development of a low-rise, three-story building on the Project Site. Table V-4 on page V-91 compares the total proposed uses under Alternative 4 with the proposed Project. Unlike the proposed Project, Alternative 4 would not include development of an art gallery or the Arts Club and would remove all the uses related to the Arts Club, such as the guestrooms, supper club, private dining, bars, lounges, mid-level terraces, and the roof's pool terrace. Instead, two levels of office space over ground floor commercial and retail uses would be developed on the Project Site with a partial subterranean level (Level B1) that would include a gym/fitness center. Alternative 4 would also eliminate three levels of subterranean parking and the emergency helipad.

Alternative 4 would reduce the proposed Project's nine-story, 141-foot building to a three-story 30,360-square-foot building with a height of 40 feet, with an additional 8-foot-tall mechanical enclosure on the roof deck. As a result, Alternative 4 would reduce the proposed development's FAR to 1.5.

Under Alternative 4, some elements of the proposed Project would be retained, such as the landscaped community plaza on the ground level, site access, lighting, and some sustainability features. In addition, Alternative 4 would include a digital billboard sign projecting from the northern façade near the northeastern corner of the building, as illustrated in Figure V-3. This digital billboard, with animated or static content that could

Figure V-3
Alternative 4 (Office/3-Story Alternative)
Conceptual Rendering

Source: Gensler, 2017.

Table V-4
Summary of Alternative 4 (Office Alternative) Uses and Comparison to the Project

Land Use	Alternative 4	Proposed Project	Difference
Gross Floor Area (FAR)	≈30,360 sf	≈132,000 sf	≈-101,640 sf
Floor Area Ratio	1.5	6.5	-5
Arts Club	—	62,968 sf	-62,968 sf
Arts Club Guestrooms	0	15	-15
Retail Area	10,120 sf	6,853 sf	3,267 sf
Gallery	—	2,192 sf	-2,192 sf
Office	20,240 sf	37,900 sf	-17,660 sf
Gym (Non-FAR)	4,390 sf	—	4,390 sf
Pool Terrace (Non-FAR)	—	6,730 sf	-6,730 sf
Maximum Building Height[a]	48 ft	141 ft	-93 ft
Number of Parking Spaces	114	354	-240
Number of Above-Grade Stories	3	9	-6
Number of Below-Grade Levels	3	6	-3

sf = square feet
ft = feet
[a] *Note that this figure represents the height of the building, including the 8-foot high mechanical enclosure on the roof. The height of the building to the top of the roof would be 40 feet.*

Source: Gensler, 2017.

display "off-site" advertising, would have a sign face of up to 28 feet in height, 15 feet in width, for a total square footage of approximately 420 square feet per side. The digital billboard would also have luminance levels not to exceed 6,000 candelas per square meter during daylight hours (i.e., from sunrise until 20 minutes prior to sunset) and 300 candelas per square meter during evening hours (from sunset until 20 minutes prior to sunrise). Furthermore, from 2:00 A.M. until sunrise, the digital billboard would have no animated content or moving patterns in compliance with Section 3.E.5.b of the City's proposed Sunset Boulevard Off-Site Signage Policy, which is an amendment to the City's Sunset Specific Plan currently under consideration by the City Council.

The signage program proposed under this alternative would be approved under a Development Agreement with the City pursuant to WHMC Chapter 19.66 and would contain negotiated public benefits. Consistent with Section 3.F.1 of the proposed Sunset Boulevard Off-Site Signage Policy, the negotiated public benefits would consider: (1) monthly revenue to the City to address community benefit priorities, and (2) site improvements, such as the already-proposed community landscaped plaza and pedestrian

features under this alternative to enhance the pedestrian experience on Sunset Boulevard, as well as a public access agreement with the City for a portion of the digital billboard. The proposed signage program under this alternative would also comply with the requirement of Section 3.C.2.d of the City's proposed Sunset Boulevard Off-Site Signage Policy that applicants undergo an "urban design screening process to ensure that Digital Billboard applications meet the City's criteria for architectural excellence, integration of billboards and architecture, innovation, and qualified teams that include both development and media operations professionals with demonstrated experience."

Parking would be reduced from 354 spaces to 114 spaces, which would be accommodated within two subterranean levels and one partial subterranean level, as well as on a surface parking lot on the southern portion of the Project Site.

As with the proposed Project, construction of Alternative 4 would commence with demolition of the existing building structures, surface parking lot, and subterranean parking, followed by grading and excavation for the subterranean parking garage for Alternative 4. The estimated depth of excavation expected for the subterranean levels and building foundations would be approximately 39 feet below grade. It is estimated that approximately 16,100 cubic yards of export material[7] (e.g., concrete and asphalt surfaces) and soil would be hauled from the Project Site during the demolition and excavation phase.

2. Environmental Impact Analysis

a. Aesthetics, Views, Light and Glare, and Shading

As discussed above, SB 743 amended CEQA and changed the way in which environmental impacts related to aesthetics are addressed in an EIR. Section 21099(d)(1) of the PRC states that the "aesthetic and parking impacts of a residential, multi-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment." Similar to the proposed Project, as an employment center project located in a TPA, this alternative's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Therefore, the following analysis regarding aesthetics, visual character, views, light and glare, and shading is provided for informational purposes only.

[7] *KPFF, Calculation of Exported Material, August 7, 2017.*

(1) Aesthetics/Visual Quality

(a) Construction

Similar to the proposed Project, Alternative 4 would temporarily alter the visual appearance of the Project Site due to the removal of the existing building and surface parking lot. Other construction activities, including site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of building foundations and proposed structures would also alter the visual character and quality of the Project Site and adjacent roadways. These construction activities could be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. However, Alternative 4 would involve a shorter construction duration and would incorporate similar project design features as the proposed Project during construction, including the installation of temporary construction fencing along the periphery of the Project Site that would screen much of the construction activity from view at street level. In addition, any pedestrian walkways and construction fencing accessible to the public would be monitored for graffiti removal throughout the construction period. Overall, similar to the proposed Project, while Alternative 4 would alter the visual character of the Project area on a short-term basis, construction activities would not substantially alter or degrade the existing visual character of the Project Site. Therefore, impacts related to aesthetics during construction of Alternative 4 would be less than significant and would be less than the proposed Project.

(b) Operation

Alternative 4 would replace the existing two-story low-rise commercial building and surface parking lot on the Project Site with a three-story low-rise office building with ground floor retail. Alternative 4 would slightly increase the density and height of the existing development on the Project Site by constructing a new building on a portion of the Project Site and adding one story. This alternative somewhat resembles the existing commercial building on-site; as such, Alternative 4 would not substantially alter the visual character of the Project Site. Relative to the proposed Project this alternative would lack many of the proposed Project features, such as the vertical fins, outdoor terraces and balconies, and the iconic building design, that would contribute to the aesthetic character of the Project area. However, the proposed building under Alternative 4 would not substantially degrade the existing visual character and quality of the Project Site and its surroundings or introduce elements that generate substantial long-term contrast with or substantially detract from the visual character of Sunset Boulevard and the western portion of the Sunset Strip. Therefore, similar to the proposed Project, implementation of Alternative 4 would result in a less-than-significant impact related to aesthetics and visual quality.

(2) Views

The new office building proposed under Alternative 4 would be three stories in height, which somewhat resembles the existing commercial building on-site. Accordingly, Alternative 4 would not result in substantial changes to short-range views of the Project Site since the height and mass of the three-story building under Alternative 4 would not be significantly different than the existing two-story building on the Project Site, particularly along the immediately adjacent roadways (i.e., Sunset Boulevard and Hilldale Avenue). The building under Alternative 4 would also be similar to the existing heights in the immediate area.

Long-range views of identified visual resources or scenic vistas would not be affected by the development under Alternative 4. There are no scenic resources located on the Project Site or in the immediate vicinity of the Project Site. Therefore, Alternative 4 would not damage or obstruct views of scenic vistas, and impacts to views would be less than significant and less than those of the proposed Project due to the significant height reduction.

(3) Light and Glare

(a) Construction

Construction of Alternative 4 would introduce new, temporary sources of light and glare to the Project Site. As with the proposed Project, while the majority of construction would occur during daylight hours, there is a potential that construction could occur in the early evening hours within the permitted hours of construction and require the use of artificial lighting. However, Alternative 4 would incorporate similar project design features as the proposed Project during construction, including the use of construction lighting that would be shielded and/or aimed so that no direct beam illumination would fall outside of the Project Site boundary. To the extent early evening construction includes artificial light sources, such use would be temporary and would cease upon completion of construction activities. Furthermore, construction-related illumination would be used for safety and security purposes only, in compliance with WHMC light intensity requirements (Section 19.20.100). Therefore, similar to the proposed Project, with adherence to existing WHMC regulations and project design features, light resulting from construction activities would not significantly impact off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

In addition, as with the proposed Project, any glare generated from the Project Site during construction would be highly transitory and short-term given the movement of construction equipment and materials within the construction area and the temporary

nature of construction activities. Furthermore, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. Therefore, similar to the proposed Project, light and glare associated with the construction of Alternative 4 would not substantially alter the character of off-site areas surrounding the Project Site or adversely impact day or nighttime views in the area, and impacts would be less than significant.

(b) Operation

Alternative 4 would increase lighting levels within the Project Site and the surrounding area through the introduction of new sources of artificial lighting, including low-level exterior lights adjacent to the proposed building for security and wayfinding purposes; low-level accent lighting to highlight architectural features, landscape elements, and signage. As with the proposed Project, Alternative 4 proposes a lighting scheme that would utilize low-glare fixtures to provide soft, low-level functional lighting at the building entrance and ramp area and result in minimal lighting influence to all areas surrounding the Project Site. However, although the reduced building volume would result in lower light emissions from the overall development, Alternative 4 would include a digital billboard that would introduce a new source of artificial lighting that is not proposed under the Project. This digital billboard would comply with the required sign luminance levels established in the City's proposed Sunset Boulevard Off-Site Signage Policy to ensure that lighting levels are consistent with those already existing on or envisioned for the Sunset Strip. Since this digital board would be incorporated into the northern façade of the proposed building under this alternative, no changes to the lighting levels on Hilldale Avenue would occur when compared to the proposed Project. Therefore, similar to the proposed Project, illuminance levels associated with building and site lighting under Alternative 4 would be less than significant.

Additionally, as with the proposed Project, development under Alternative 4 could affect daytime glare conditions with the introduction of a new building and signage at the Project Site. To address daytime glare conditions, Alternative 4 would incorporate some of the same project design features as the proposed Project, including the use of glass in building façades that is anti-reflective or treated with an anti-reflective coating in order to minimize glare. Thus, development of Alternative 4 would not incorporate substantial amounts of highly reflective building materials or signage that would be highly visible to off-site glare-sensitive uses and would not substantially alter the character of the off-site areas surrounding the Project Site or interfere with the performance of an off-site activity. As discussed above, the digital billboard would comply with the required sign luminance levels established in the City's proposed Sunset Boulevard Off-Site Signage Policy to ensure that lighting levels, including those that may result in daytime glare, are consistent with those already existing on or envisioned for the Sunset Strip. Therefore, similar to the proposed Project, daytime glare under Alternative 4 would be less than significant.

(4) Shading

As discussed in Section IV.A, Aesthetics, Views, Light/Glare, and Shading, of this Draft EIR, the proposed Project would not have a significant shading impact on nearby sensitive receptors. Alternative 4 would construct a three-story building, which would be considerably shorter than the proposed Project. Therefore, shading under Alternative 4 would be less than that of the proposed Project and would be less than significant.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

Alternative 4 would involve a significantly reduced amount of excavation and building construction when compared to the proposed Project due to the elimination of three subterranean levels and six aboveground levels. Accordingly, the duration of construction would also be reduced. As with the proposed Project, construction of Alternative 4 would generate air emissions through the use of heavy-duty construction equipment and haul truck and construction worker trips. While the overall amount of excavation and building construction would be greatly reduced than what is proposed under the Project, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to those of the proposed Project and would be less than significant.

(b) Toxic Air Contaminants

As with the proposed Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.B, Air Quality, of this Draft EIR, the proposed Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 4 would be greatly reduced when compared to the proposed Project since this alternative would require substantially less excavation and building construction due to the elimination of three subterranean levels and six aboveground levels. Correspondingly, the substantial reduction in the duration of the construction schedule would reduce overall TAC emissions resulting from construction activities. Therefore, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less than significant and less than those of the proposed Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Alternative 4 would reduce the total square footage of development on the Project Site from approximately 132,000 square feet as proposed by the Project to approximately 30,360 square feet. As discussed below in Subsection V.D.2.j, Traffic, Access, and Parking, the number of net new daily vehicle trips generated by Alternative 4 (86 trips) would be substantially less than the number of trips generated by the proposed Project (1,961 trips), as shown in Appendix L of this Draft EIR. Since the amount of mobile source emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 4 would be less than the emissions generated by the proposed Project, as well as existing uses. Therefore, under Alternative 4, total contributions to regional air pollutant emissions during operation (under both existing and future conditions) would be minimal, if any, and would be substantially less than the proposed Project's contribution. Accordingly, regional air quality impacts under Alternative 4 would be less than significant and less than those of the proposed Project.

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes. As discussed above, Alternative 4 would reduce the number of trips currently generated by existing uses on-site. Therefore, no localized air quality impacts (under both existing and future conditions) would occur under Alternative 4. Thus, Alternative 4 would avoid the already less-than-significant impacts of the proposed Project associated with localized emissions, and impacts would be less than those of the proposed Project.

(b) Toxic Air Contaminants

Similar to the proposed Project, Alternative 4 would not include any substantial TAC sources as defined in the South Coast Air Quality Management District's (SCAQMD) *Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning* (2005) and the California Air Resources Board's (CARB) *Air Quality and Land Use Handbook: A Community Health Perspective* (2005). Alternative 4 would result in some TAC emissions, primarily from mobile source emissions, which, as discussed above, would be substantially less than the mobile source emissions generated by the proposed Project. Therefore, TAC impacts resulting from mobile sources would be less than significant under Alternative 4 and would be less than those of the proposed Project.

c. Geology and Soils

Under Alternative 4, impacts related to site-specific geologic hazards, including fault rupture, strong seismic shaking, liquefaction, seismically induced settlement, soil stability,

subsidence, expansive soils would be similar to those under the proposed Project because such impacts are a function of the Project Site's underlying geologic conditions rather than the type of land use proposed. However, Alternative 4 would require a substantially reduced level of depth of excavation as compared to the proposed Project. Alternative 4 would be developed within the same site as the proposed Project and would comply with the same regulatory requirements as the proposed Project to ensure that the soils underlying the Project Site can adequately support the proposed development. As with the proposed Project, Alternative 4 would be designed and constructed to conform to the current seismic design provisions of the California Building Code and the City of West Hollywood Building Code. Alternative 4 would also implement the same mitigation measure (Mitigation Measure C-1) as the proposed Project, which requires the preparation of a final design-level geotechnical engineering report to identify and minimize seismic risks. Overall, impacts related to geology and soils under Alternative 4 would be less than significant with mitigation, and such impacts would be similar to those of the proposed Project.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined, in large part, by the number of daily trips generated and energy and water consumption by the proposed land uses. Under Alternative 4, the trip generation and energy and water consumption from proposed land uses would be greatly reduced compared to the proposed Project due to the reduction in the overall square footage of the proposed development under this alternative, as shown in Table V-2 on page V-31. Thus, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the proposed Project. Alternative 4 would incorporate some of the same project design features as the proposed Project to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance and CALGreen. In complying with the City's Green Building Ordinance, it is anticipated that Alternative 4 would be consistent with the GHG reduction goals and objectives included in City's Climate Action Plan and state and regional regulatory plans. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant and less than those of the proposed Project.

e. Hazards and Hazardous Materials

As with the proposed Project, Alternative 4 would require the use of products for construction and operations that are routinely used in performing everyday household and retail activities consistent with regulatory requirements. This alternative would not require the use of hazardous materials beyond these routinely used products. Similar to the proposed Project, Alternative 4 would comply with applicable regulations regarding the storage, generation, handling, and disposal of hazardous materials. Furthermore, construction and operation of Alternative 4 would not expose persons to substantial risk

resulting from the release of hazardous materials or from exposure to a health hazard in excess of regulatory standards or interfere with existing or projected future emergency response capacity to the Project area. Therefore, similar to the proposed Project, impacts related to hazards and hazardous materials under Alternative 4 would be less than significant during construction and operation of the proposed development.

f. Hydrology and Water Quality

(1) Surface Water Hydrology

(a) Construction

Similar to the proposed Project, construction activities under Alternative 4 would require grading and excavation that would have the potential to temporarily alter the existing surface drainage patterns and flows within the Project Site by diverting existing surface flows as a result of exposing underlying soils and making the Project Site temporarily more permeable. However, as with the proposed Project, Alternative 4 would be required to comply with all applicable City grading permit regulations, including, but not limited to, the City's Green Building Ordinance and WHMC requirements, that require necessary measures, plans, and inspections to reduce flooding, sedimentation, and erosion. Thus, through implementation of BMPs and compliance with applicable City grading regulations, construction of Alternative 4 would not substantially alter the Project Site drainage patterns in a manner that would result in substantial erosion, siltation, flooding on- or off-site. Similarly, adherence to standard compliance measures during construction activities would ensure that Alternative 4 would not cause flooding that would have the potential to harm people or damage property or sensitive biological resources, substantially reduce or increase the amount of surface water flow from the Project Site into a water body, result in a permanent, adverse change to the movement of surface water to produce a substantial change in the current or direction of water flow during construction, or result in runoff water that would exceed the capacity of existing or planned stormwater drainage systems. As such, similar to the proposed Project, construction-related impacts to surface water hydrology under Alternative 4 would be less than significant.

(b) Operation

Alternative 4 would result in the same reduction of impervious area as the proposed Project (i.e., from 99 percent to 95 percent). Accordingly, similar to the proposed Project, the change in stormwater peak flow rate is negligible and would remain at 1.57 cubic feet per second (cfs). As with the proposed Project, Alternative 4 would provide either a capture and reuse system or a biofiltration system to manage stormwater flows. As such, Alternative 4 would not result in any incremental impact on either on-site or off-site flooding during a 50-year storm event, substantially reduce or increase the amount of surface water in a water body, or create or contribute runoff water that would exceed the capacity of the

storm drain system. Furthermore, Alternative 4 would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion, siltation, or flooding on- or off-site. As such, similar to the proposed Project, operation of Alternative 4 would result in a less-than-significant impact on surface water hydrology.

(2) Surface Water Quality

(a) Construction

Similar to the proposed Project, construction activities, such as earth moving, maintenance/operation of construction equipment, pavement grinding, and handling/storage/disposal of materials, associated with Alternative 4 could contribute to pollutant loading in stormwater runoff. However, Alternative 4 would incorporate some of the same project design features as the proposed Project during construction, including Project Design Feature F-3 related to the preparation of an LSWPPP and an ECP to identify potential pollutant sources that may affect the quality of discharge associated with construction activity, identify non-stormwater discharges, and recommend means and methods to effectively prohibit the entry of pollutants into the public storm drain system during construction. As with the proposed Project, through implementation of the LSWPPP and ECP, and City grading regulations, including the implementation of BMPs, construction of Alternative 4 would not result in discharge that would create pollution that would alter the quality of the water of the state (i.e., Ballona Creek and Santa Monica Bay) to a degree, which unreasonably affects beneficial uses of the waters; contaminate the quality of the water of the state by waste to a degree, which creates a hazard to the public health through poisoning or through the spread of diseases; or create a nuisance that would be injurious to health, affect an entire community or neighborhood or any considerable number of persons, and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of Alternative 4 would not result in discharges that would provide substantial additional sources of polluted runoff, cause regulatory standards to be violated in Santa Monica Bay, or substantially degrade water quality. As such, similar to the proposed Project, construction-related impacts to surface water quality under Alternative 4 would be less than significant.

(b) Operation

Similar to the proposed Project, with the implementation of an approved LID Plan, including a capture or reuse system or biofiltration system to manage stormwater flows, operation of Alternative 4 would not provide substantial additional sources of polluted runoff or result in discharges that would cause pollution that would alter the quality of the waters of the state (i.e., Ballona Creek and Santa Monica Bay) to a degree which unreasonably affects beneficial uses of the waters; contaminate the quality of the waters of the state by

waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or create a nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, operation and maintenance of the LID features under Alternative 4 would not result in discharges that would violate any water quality standards or waste discharge requirements or substantially degrade surface water quality. Therefore, similar to the proposed Project, impacts to surface water quality under Alternative 4 would be less than significant.

(3) Groundwater Hydrology

(a) Construction

Development of Alternative 4 includes subterranean levels that would reach approximately 39 feet below Sunset Boulevard at its lowest point. Similar to the proposed Project, since the historic high groundwater elevation at the Project Site was found to be approximately 22 feet and groundwater was encountered in borings at a depth of 36 feet, groundwater may be encountered during excavation activities associated with Alternative 4, and temporary dewatering may be required within the Project Site. As with the proposed Project, in the event that temporary dewatering is required, a small amount of groundwater would be removed during excavation, but only until such time as waterproofing is installed up to the groundwater table. Any discharge of groundwater during construction of the proposed Project would occur pursuant to, and comply with, the applicable permit requirements of a General NPDES Permit issued by the LARWQCB. Groundwater shall only be discharged to the storm drain system, not to the City-owned sewer system. Therefore, if dewatering is required, operation of the temporary dewatering system would have a minimal effect on local groundwater recharge in the vicinity of the Project Site. Accordingly, similar to the proposed Project, Alternative 4 is not anticipated to adversely impact the flow rate or direction of groundwater and would not have an adverse effect on any water supply wells. Therefore, construction of Alternative 4 would not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, deplete groundwater supplies, result in a demonstrable and sustained reduction of groundwater recharge capacity, or interfere with groundwater recharge. As such, similar to the proposed Project, impacts related to groundwater hydrology under Alternative 4 would be less than significant.

(b) Operation

Similar to the proposed Project, due to the depth of excavation associated with Alternative 4, groundwater may be encountered. In lieu of a permanent dewatering system, the building's foundation would be designed in a manner as to support the proposed structure in saturated soils conditions. This foundation design would result in

only minor impacts to the top of the groundwater table and would not affect any supply wells. Therefore, as with the proposed Project, operation of Alternative 4 would not change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, reduce yields in adjacent wells, or result in a demonstrable and sustained reduction of groundwater recharge capacity. As such, similar to the proposed Project, impacts related to groundwater hydrology under Alternative 4 would be less than significant.

(4) Groundwater Quality

(a) Construction

Similar to the proposed Project, during on-site grading and building construction, the use of hazardous materials, such as fuels, paints, solvents, and concrete additives, would require proper management and, in some cases, disposal to minimize, if not avoid, the releases of hazardous materials into groundwater. As with the proposed Project, compliance with all applicable federal, state, and local requirements concerning the handling, storage, and disposal of hazardous waste would reduce the potential for the construction of Alternative 4 to release contaminants into the groundwater that could affect the rate or direction of movement of existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, as there are no groundwater production wells or public water supply wells within one mile of the Project Site, construction activities would not be anticipated to affect existing wells. Accordingly, similar to the proposed Project, construction impacts on groundwater quality under Alternative 4 would be less than significant.

(b) Operation

Similar to the proposed Project, Alternative 4 proposes a capture and reuse system or a biofiltration system] to treat stormwater runoff to minimize, if not avoid, potential impacts to groundwater. Surface contaminants also have the potential to adversely impact the quality of groundwater. As with the proposed Project, operation of Alternative 4 would involve the limited use of potentially hazardous materials typical of those used in commercial developments, including cleaning agents, paints, pesticides, and other materials used for landscaping. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials to be released into the groundwater. However, all potentially hazardous materials would be used, stored, and disposed of in accordance with manufacturers' specifications and handled in compliance with applicable standards and regulations. As with the proposed Project, compliance with all applicable federal, state, and local requirements, concerning the handling, storage and disposal of hazardous waste, would reduce the potential for operation of Alternative 4 to release

contaminants into the groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, cause a violation of regulatory water quality standards at an existing production well, or otherwise substantially degrade groundwater quality. Accordingly, similar to the proposed Project, impacts on groundwater quality under Alternative 4 would be less than significant.

g. Land Use

Alternative 4 would develop office and retail/commercial uses on the Project Site at a substantially reduced density and height as compared to the proposed Project. Alternative 4 would not require any discretionary approvals as the development under this alternative would be implemented in compliance with the SSP, General Plan land use designation, and the zoning designations under the City's Zone Map. Alternative 4 would be consistent with the overall intent of the applicable goals and objectives of the General Plan, SSP, and the WHMC requirements and applicable regional plans. Alternative 4 would not revitalize the Project Site to the same extent as the proposed Project and would not include a unique cultural use such as that proposed by the Arts Club. As a result, Alternative 4 would fail to provide the same level of enhancement to the arts and culture within the City, or the maintenance of Sunset Boulevard as a regional, national and international destination for entertainment and the primary economic engine of the City. In addition, this alternative would not include the same environmental sustainability features as the proposed Project. However, it would provide for new commercial, retail, and office uses in an area well-served by public transit. In addition, it would be consistent with the City's vision to strengthen the attractiveness and the economic viability of the western portion of Sunset Boulevard and increase the pedestrian experience and activity in this portion of the Sunset Strip as compared to the existing conditions on the site by providing a new office building with ground floor retail space, as well as a digital billboard that may potentially contribute to the City's monthly revenue to address community benefit priorities. This proposed digital billboard would comply with the requirements established in the City's proposed Sunset Boulevard Off-Site Signage Policy to ensure that the proposed signage under this alternative is consistent with those already existing on or envisioned for the Sunset Strip. More specifically, the proposed digital billboard would be consistent with the following elements of the proposed Sunset Boulevard Off-Site Signage Policy: (1) promote innovative media, off-site advertising, technology and architectural excellence to create iconic urban design; (2) support excellent building design with thoughtfully integrated off-site advertising that focuses on non-standard and innovative media formatting; (3) support sustainable design with requirements that equal or exceed Title 24 requirements for offsetting new energy usage; (4) orient digital billboards as vertical displays to reduce visual clutter and support coordinated programming with unique site-specific advertising and art; and (5) locate and design digital billboards so as not to cause light and glare impacts on neighboring uses. Alternative 4 would incorporate some of the same environmentally sustainable features and construction protocols as those under the

proposed Project to reduce energy and water usage and waste to reduce GHG emissions and help minimize the impact on natural resources and infrastructure. Thus, similar to the proposed Project, impacts related to land use consistency under Alternative 4 would be less than significant.

Similar to the Project, the mix of uses, consisting of office, commercial, and retail, proposed under Alternative 4 would be compatible with existing development on the Sunset Strip and would not substantially or adversely change the existing land use relationships between the Project Site and adjacent land uses. As with the proposed Project, Alternative 4 would provide a range of retail businesses, employment opportunities, and other supportive urban uses to the surrounding area and the City. In this way, similar to the proposed Project, Alternative 4 would be compatible with the types of land uses in the vicinity of the Project Site, and impacts associated with land use compatibility would be less than significant.

h. Noise

(1) Construction

Alternative 4 would involve the same general phases of construction as the proposed Project (i.e., site grading and excavation, building construction, and finishing/landscape installation). However, Alternative 4 would involve a significantly reduced amount of excavation and building construction when compared to the proposed Project due to the elimination of two subterranean levels and six aboveground levels. Accordingly, the duration of construction would also be reduced. As with the proposed Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment, as well as from haul truck and construction worker trips, in close proximity to sensitive receptors. Under Alternative 4, on- and off-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days to those of the proposed Project. Thus, noise and vibration levels during maximum activity days, which are used for measuring noise impact significance, would be similar to those of the proposed Project. As with the proposed Project, Alternative 4 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures to reduce noise and vibration levels during construction to the extent feasible. Similar to the proposed Project, with implementation of mitigation measures, on-site vibration impacts associated with potential building damage would be reduced to a less-than-significant level under Alternative 4. However, similar to the proposed Project, construction of Alternative 4 would result in significant and unavoidable on-site noise and vibration impacts associated with human annoyance during construction. Similar to the proposed Project, construction of Alternative 4 would also result in a cumulative significant and unavoidable on-site noise impact in the event the construction of Related Project No. 43, which is located immediately

west of the Project Site, occurs simultaneously with Alternative 4 due to the presence of sensitive receptors immediately south of the Project Site and Related Project No. 43.

(2) Operation

As described in Section IV.H, Noise, of this Draft EIR, sources of operational noise include on-site stationary noise sources, such as outdoor mechanical equipment (i.e., HVAC equipment), activities associated with the outdoor areas (e.g., the landscaped plaza), parking facility, and loading dock/trash collection area, and off-site mobile (roadway traffic) noise sources. As with the proposed Project, new mechanical equipment (e.g., air ventilation equipment) under Alternative 4 would be located on the roof level and in the interior of the building. Alternative 4 would incorporate some of the same project design features as the proposed Project, including Project Design Feature H-3, which will enclose or screen all outdoor mounted mechanical equipment from off-site noise-sensitive receptors. The proposed loading dock and trash collection areas for Alternative 4 would also be located in the same location as the proposed Project. Thus, noise impacts from loading dock and trash collection areas would also be the same as the proposed Project. With regard to parking, Alternative 4 would provide both subterranean parking and surface parking, which would result in additional potential noise sources from vehicular movements and engine noise; doors opening and closing; human activity, such as people talking; and intermittent car alarms. Thus, noise impacts due to parking would be greater than those of the proposed Project. However, Alternative 4 would not include outdoor terraces and, thus, would eliminate this noise source from the proposed Project. As such, on-site noise impacts under Alternative 4 would be less than significant and similar to those of the proposed Project.

With regard to off-site noise sources, Alternative 4 would result in 86 net daily trips, which is a substantial reduction in daily trips (1,875 fewer trips) compared to the proposed Project, as discussed below in Subsection V.D.2.j. This substantial reduction in vehicle trips would, in turn, reduce the already less-than-significant off-site traffic-related noise levels generated by the proposed Project under future conditions and reduce the significant unavoidable impact under existing conditions to a less-than-significant level. However, cumulative operational noise from off-site traffic, primarily resulting from Related Project No. 43, would still exceed the 5-dBA threshold, specifically along Hilldale Avenue (south of Sunset Boulevard) although this alternative's contribution to this impact would not be cumulatively considerable and would be less than that of the proposed Project. Therefore, off-site noise impact at the Project-level (under both Existing Plus Project and Future Plus Project conditions) would be less than significant under Alternative 4, and impacts would be less than those of the proposed Project. Nonetheless, cumulative operational noise from off-site traffic would remain significant and unavoidable although Alternative 4's contribution to this impact not be cumulatively considerable and would be less than that of the proposed Project.

i. Public Services

(1) Police Protection

(a) Construction

The types of construction activities under Alternative 4 would be similar to those under the proposed Project. Accordingly, the potential for theft and vandalism during construction activities at the Project Site would be similar to the proposed Project. As with the proposed Project, Alternative 4 would incorporate similar project design features as the proposed Project during construction, including Project Design Feature I.1-1, which involves implementation of temporary security measures, such as fencing, lighting, and locked entry to secure the Project Site during construction. Therefore, similar to the proposed Project, potential impacts associated with theft and vandalism during construction of Alternative 4 would be less than significant.

Similar to the proposed Project, construction activities under Alternative 4 could also potentially impact LACSD police protection services and response times within the West Hollywood Station service area due to construction impacts on the surrounding roadways. As with the proposed Project, access to the Project Site and the surrounding area could be impacted by construction-related activities, such as temporary lane closures, and the generation of traffic resulting from construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the proposed Project, a Construction Management Plan will be implemented during construction of Alternative 4 pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Elements of the Construction Management Plan will be implemented to provide temporary traffic controls to direct traffic around any closures (e.g., signs, delineators, etc.) and improve traffic flow of adjacent rights-of-way and public roadways, as well as to ensure pedestrian safety. Accordingly, upon implementation of Project Design Feature J-1 and compliance with state law, construction-related impacts would be minimized and would not generate a demand for additional police protection services that would substantially exceed the capability of the LACSD to serve the Project Site. As with the proposed Project, construction of Alternative 4 would not necessitate the provision of new or physically altered government facilities in order to maintain the LACSD's capability to serve the Project Site. As such, Alternative 4 would not result in adverse physical impacts associated with the need and construction of new or altered facilities. Therefore, similar to the proposed Project, construction-related impacts to police protection services under Alternative 4 would be less than significant.

(b) Operation

Alternative 4 would slightly increase the visitor and employee population on the Project Site when compared to existing and future conditions due to the increase in on-site office space of approximately 16,240 square feet and a slight increase in on-site retail/commercial space of approximately 460 square feet. Alternative 4 would incorporate numerous design features, including, but not limited to, private on-site security and sufficient lighting, to enhance safety within and immediately surrounding the Project Site. In addition to the implementation of these project design features, Alternative 4 would generate revenues to the City's General Fund (although not to the same extent as the proposed Project), which would continue to support funding dedicated to public safety and LACSD and police services. Such funds would also be used towards staff development, supplies and equipment, and other programs and outreach implemented by the LACSD. The project design features identified above, as well as this alternative's contribution to the General Fund, would help offset the increase in demand for LACSD police services under Alternative 4. Therefore, similar to the proposed Project, impacts on police services under Alternative 4 would be less than significant.

Since Alternative 4 would result in a reduction in trips generated by on-site uses, Alternative 4 would not increase emergency vehicle response times to the Project Site and surrounding properties due to travel time delays caused by additional traffic.[8] Therefore, impacts on emergency response times under Alternative 4 would not occur and would be less than those of the Project.

(2) Fire Protection

(a) Construction

Similar to the proposed Project, construction activities have the potential to result in accidental on-site fires by exposing combustible materials (e.g., wood, plastics, sawdust, coverings and coatings) to fire risks from machinery and equipment sparks, and from exposed electrical lines, chemical reactions in combustible materials and coatings, and lighted cigarettes. However, as with the proposed Project, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials and non-hazardous combustible materials.

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[8] *Although Alternative 4 would result in a larger development on-site, Alternative 4 would generate fewer trips than those currently generated by existing uses due to the trip reductions applied to the new uses to account for trips made via non-auto travel modes (e.g., transit, walking, biking, rideshare, etc.) and internal capture for trips made between uses.*

Similar to the proposed Project, construction activities under Alternative 4 could also potentially impact the provision of LACFD services in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. As with the proposed Project, access to the Project Site and the surrounding vicinity could be impacted by construction-related activities, such as temporary lane closures, and the generation of traffic resulting from construction equipment movement, hauling of soil and construction materials to and from the Project Site, and construction worker traffic. However, as with the proposed Project, a Construction Management Plan will be implemented during construction of Alternative 4 pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. As with the proposed Project, construction of Alternative 4 would not create capacity or service level problems or result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities in order to maintain acceptable service ratios, response times or other performance objectives for fire protection. Therefore, similar to the proposed Project, impacts to fire protection and emergency medical services during construction of Alternative 4 would be less than significant.

(b) Operation

Alternative 4 would slightly increase the visitor and employee population on the Project Site when compared to existing conditions due to the increase in on-site office space of approximately 16,240 square feet and a slight increase in on-site retail/commercial space of approximately 460 square feet. This may contribute to a slight increase in demand for LACFD fire protection and emergency medical services. However, as with the proposed Project, Alternative 4 would be located within close proximity of Fire Station No. 7. In addition, similar to the proposed Project, Alternative 4 would implement all applicable Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc.

In addition, similar to the proposed Project, Alternative 4 would also submit an emergency response plan for LACFD approval. Emergency access also would be maintained on-site in accordance with Fire Code requirements. Driveway and internal circulation would be designed to incorporate all applicable County Building Code and Fire Code requirements regarding site access, including providing adequate emergency vehicle access.

As with the proposed Project, Alternative 4 would be required to meet LACFD fire flow requirements. Furthermore, Alternative 4 would generate revenues to the City's General Fund, which would continue to support the funding of fire protection services, fire prevention, and public safety outreach performed by the LACFD. Therefore, similar to the

proposed Project, overall impacts with regard to LACFD fire protection during operation of Alternative 4 would be less than significant.

j. Traffic, Access, and Parking

SB 743 amended CEQA to streamline environmental review for several categories of development projects, including the development of infill projects in transit priority areas (TPA). Among other things, under SB 743 and PRC Section 21099(d)(1), parking impacts are not considered significant impacts under CEQA if a project is a residential, mixed-use residential, or employment center project and is located on an infill site within a TPA. As with the proposed Project, Alternative 4 is considered an employment center project on an infill site within a TPA. Accordingly, as an employment center project located in a TPA, Alternative 4 is one of several types of projects whose parking impacts shall not be considered significant impacts on the environment. Therefore, the analysis regarding this alternative's parking is provided for informational purposes only.

(1) Construction

As with the proposed Project, construction of Alternative 4 would generate additional trips from heavy-duty construction equipment, haul trucks, and construction workers. However, Alternative 4 would involve a significantly reduced amount of excavation and building construction when compared to the proposed Project due to the elimination of four subterranean levels and six aboveground levels. Accordingly, the duration of construction would also be reduced. Nonetheless, the maximum daily haul truck trips and construction worker trips would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, traffic impacts on these days would be similar to those of the proposed Project. As with the proposed Project, Alternative 4 would incorporate Project Design Feature J-1, which entails implementation of a Construction Management Plan to ensure that the majority of haul truck activity to and from the Project Site would occur outside of the A.M. and P.M. peak hours. In addition, worker trips to and from the Project Site would also occur outside of the peak hours. Therefore, similar to the proposed Project, peak-hour construction traffic impacts under Alternative 4 are expected to be less than significant during construction.

Similar to the proposed Project, construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Site. As with the proposed Project, adjacent to the Project Site, the curb lanes on Sunset Boulevard and Hilldale Avenue would be used intermittently throughout the construction period for equipment staging, concrete pumping, etc. The use of the public right-of-way along Sunset Boulevard and Hilldale Avenue would require temporary rerouting of pedestrian traffic as the sidewalks fronting the Project Site would be closed.

As identified in the Construction Management Plan, temporary controls will be provided to direct traffic and pedestrians around any closures and ensure pedestrian safety along the affected sidewalks and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead coverings). Therefore, similar to the proposed Project, impacts related to traffic and pedestrian access would be less than significant.

There are no bus stops adjacent to the Project Site, and, therefore, no temporary impacts to transit are expected. Parking is allowed on both Sunset Boulevard and Hilldale Avenue (during certain hours of the day) adjacent to the Project Site; consequently, similar to the proposed Project, the installation of construction fences under Alternative 4 could result in the temporary loss of up to four on-street metered parking spaces on Sunset Boulevard and up to three on-street metered parking spaces on Hilldale Avenue. As with the proposed Project, construction of Alternative 4 is not expected to create hazards for roadway travelers, bus riders, or people utilizing on-street parking spaces, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) would be incorporated into the Construction Management Plan, included as Project Design Feature J-1. Construction-related impacts associated with access and transit would be less than significant, and the implementation of Project Design Feature J-1 would further reduce those impacts.

Based on the above, similar to the proposed Project, impacts to traffic, access, and parking during construction under Alternative 4 would be less than significant.

(2) Operation

Alternative 4 would eliminate the proposed Arts Club uses and, instead, would develop two levels of office space over ground floor commercial/retail uses. Alternative 4 would generate approximately 86 net daily trips, which would result in 1,875 fewer daily trips, 102 fewer A.M. peak-hour trips, and 145 fewer P.M. peak-hour trips than the proposed Project, as shown in Appendix L of this Draft EIR. As such, impacts to the intersection level of service and the regional transportation system would be reduced compared to the proposed Project, which were determined to be less than significant. Therefore, impacts related to intersection level of service and the regional transportation system would be less than significant under Alternative 4 would be less than those of the proposed Project.

With regard to access and circulation and bicycle, pedestrian, public transit, and vehicular safety, Alternative 4 proposes the same access and circulation scheme as the proposed Project and would provide the required number of parking spaces to accommodate the office and commercial/retail uses on the Project Site. Therefore, impacts

to access and circulation; bicycle, pedestrian, and vehicular safety; and parking under Alternative 4 would be similar to those of the proposed Project and would be less than significant.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the proposed Project, construction activities under Alternative 4 would result in a temporary demand for water associated with soil compaction and earthwork, dust control, mixing and placement of concrete, equipment and site cleanup, irrigation for plant and landscaping establishment, testing of water connections and flushing, and other short-term related activities. These activities would occur incrementally throughout construction of Alternative 4 (from the start of construction to buildout of Alternative 4). As with the proposed Project, the amount of water used during construction would vary depending on soil conditions, weather, and the specific activities being performed. However, water use during construction would be anticipated to be less than the net new water consumption of Alternative 4 at buildout. In addition, water use during construction would be short-term and have an intermittent demand only for water during construction activities and would be somewhat offset by the water currently consumed by the existing commercial building, which would be removed. As with the proposed Project, construction activities under Alternative 4 would require minimal water demand and are not anticipated to have a substantial adverse impact on available water supplies or infrastructure. In addition, off-site construction impacts would be temporary in nature and would not disrupt water service. As such, similar to the proposed Project, construction-related impacts to water supply under Alternative 4 would be less than significant.

In addition, similar to the proposed Project, the existing water infrastructure would be adequate to provide for the water flow necessary to serve the proposed development under Alternative 4. Minor off-site construction work associated with trenching would occur, resulting in partial street closures along Sunset Boulevard and/or Hilldale Avenue adjacent to the Project Site. However, such closures would be temporary in nature and would not result in a substantial inconvenience to motorists or pedestrians, who would have additional options for navigating around the construction activities. Furthermore, as discussed in Section IV.J, Traffic, Access, and Parking, of this Draft EIR, a Construction Management Plan will be implemented during construction activities pursuant to Project Design Feature J-1 to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Overall, construction activities associated with Alternative 4 would not require or result in the construction of new water facilities or expansion of existing facilities, except for the new service connections to connect to the

mainlines. In addition, the water distribution capacity would be adequate to serve the proposed development under Alternative 4. Furthermore, off-site construction impacts associated with installation of the new service connections would be temporary in nature and would not result in a substantial interruption in water service or inconvenience to motorists or pedestrians. As such, similar to the proposed Project, construction-related impacts to water infrastructure under Alternative 4 would be less than significant.

(b) Operation

Alternative 4 would develop an office building over ground floor commercial/retail uses on the Project Site. Alternative 4 would substantially reduce the square footage of the proposed development on-site from approximately 132,000 square feet to approximately 30,360 square feet of office and commercial/retail uses. While Alternative 4 would generate an increase in demand for water compared to existing conditions, such demand would be less than the proposed Project. Thus, the estimated net water demand under Alternative 4 for the City of Beverly Hills service area would be within its available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 4 since the water demand would be lower than the proposed Project. Thus, impacts to water supply and water infrastructure under Alternative 4 would be less than significant and would be less than those of the proposed Project.

(2) Wastewater

(a) Construction

Similar to the proposed Project, during construction of Alternative 4, existing sewer laterals would be capped, and no sewage would enter the public sewer system. Temporary facilities (such as portable toilet and hand wash areas) will be provided by the contractor at the Project Site. Sewage from these temporary facilities will be collected and hauled off-site to a waste treatment facility and not discharged into the public sewer system. As such, wastewater generation from the proposed Project's construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, similar to the proposed Project, construction of Alternative 4 is not anticipated to substantially or incrementally exceed the future scheduled capacity of the HTP or any other wastewater treatment plant.

Additionally, construction activities associated with the installation of new or relocated sewer line connections would be confined to trenching in order to place the sewer lines below surface. Such activities would be coordinated through the City so as not interrupt existing service to other users. Therefore, similar to the proposed Project,

construction activities are not anticipated to have any adverse impact on wastewater conveyance or treatment infrastructure, and impacts would be less than significant.

(b) Operation

Alternative 4 would develop an office building over ground floor commercial/retail uses on the Project Site. Alternative 4 would substantially reduce the square footage of the proposed development on-site from approximately 132,000 square feet to approximately 30,360 square feet of office and commercial/retail uses. While Alternative 4 would generate an increase in wastewater generation compared to existing conditions, this estimated wastewater generation and wastewater flow would be less than the Project. Thus, it can be reasonably concluded that since the proposed Project-generated wastewater would be accommodated by the existing capacity of the HTP, the wastewater generated by Alternative 4, which would be less than the proposed Project, would also be accommodated by the existing capacity of the HTP. As such, impacts related to wastewater generation under Alternative 4 would be less than significant and would be less than those of the proposed Project.

(3) Solid Waste

(a) Construction

Construction of Alternative 4 would involve demolition and building construction activities. Alternative 4 would also remove the existing commercial building, surface parking lot, and subterranean parking on the Project Site to construct an office development at a greatly reduced density. However, due to the reduced scope of building construction under Alternative 4, the amount of construction waste generated by Alternative 4 would be less the proposed Project. Alternative 4 would also implement similar project design features as the proposed Project during construction and would be required to prepare and implement a Construction and Demolition Waste Management Plan to comply with the requirements of the WHMC. As with the proposed Project, specific project design features would include implementation of waste reduction measures to promote source reduction and recycling, consistent with AB 939 and other applicable state and local statutes. While the amount of demolition waste would be the same as the proposed Project, given that the construction waste would be less than the proposed Project, it is reasonable to assume that construction of Alternative 4 would not conflict with any of the solid waste policies and objectives of the state or City of West Hollywood. As such, solid waste impacts during construction under Alternative 4 would be less than significant and less than those of the proposed Project.

(b) Operation

Alternative 4 would develop an office building over ground floor commercial/retail uses on the Project Site. Alternative 4 would substantially reduce the square footage of the proposed development on-site from approximately 132,000 square feet to approximately 30,360 square feet of office and commercial/retail uses. While Alternative 4 would generate an increase in solid waste generation compared to existing conditions, this estimated solid waste generation would be less than the proposed Project. Thus, it can be reasonably concluded that since the proposed Project's solid waste disposal demands could be met without the need for additional landfill capacity, solid waste disposal demands by Alternative 4, which would be less than the proposed Project, would also be met without the need for additional landfill capacity. As such, impacts related to solid waste generation under Alternative 4 would be less than significant and would be less than those of the proposed Project.

(4) Energy

(a) Construction

Similar to the proposed Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Construction of Alternative 4 would involve similar demolition activities but substantially reduced building construction activities as the proposed Project. Construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Therefore, impacts on energy resources associated with short-term construction activities under Alternative 4 would be less than significant and less than those of the proposed Project.

(b) Operation

Alternative 4 would develop an office building over ground floor commercial/retail uses on the Project Site. Alternative 4 would substantially reduce the square footage of the proposed development on-site from approximately 132,000 square feet to approximately 30,360 square feet of office and commercial/retail uses. In addition, as previously discussed, Alternative 4 result in overall substantial trip reduction when compared to the proposed Project. Thus, while Alternative 4 would generate an increase in energy consumption (i.e., electricity, natural gas, and petroleum-based fuels) compared to existing and future conditions, this estimated energy consumption would be less than the proposed Project. Accordingly, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. Therefore,

impacts to energy resources under Alternative 4 would be less than significant and would be less than those of the proposed Project.

3. Comparison of Impacts

As evaluated above, Alternative 4 would not eliminate the proposed Project's significant and unavoidable impacts related to on-site construction noise impacts (both Project-level and cumulative conditions) and on-site construction vibration impacts (related to human annoyance). In addition, cumulative off-site traffic noise during operation under Alternative 4 would still exceed the 5-dBA significance threshold, specifically along Hilldale Avenue (south of Sunset Boulevard), although this alternative's contribution to this impact would not be cumulatively considerable and would be less than that of the proposed Project. Alternative 4's impacts related to aesthetics/visual quality during construction, views, shading, operational regional and localized air pollutant emissions, operational TAC emissions, GHG emissions, on- and off-site operational noise (under both existing and future conditions), emergency response times, operational traffic, utilities and service systems during operation (water consumption, wastewater generation, solid waste generation, and energy consumption), and solid waste generation and energy consumption during construction would be less than under the proposed Project. However, these impacts of the proposed Project are already less than significant (with the exception of the Project-level noise impacts under Existing Plus Project condition, which is considered significant and unavoidable for the proposed Project) and would not be eliminated with this alternative. All other impacts would be similar to those of the proposed Project.

4. Relationship of the Alternative to Project Objectives

Alternative 4 represents a substantially reduced scope of development compared to the proposed Project due to the elimination of the proposed Arts Club space and the development of a low-rise office (with ground floor retail) alternative. Alternative 4 would not meet the underlying purpose of the proposed Project to maximize the development potential on the Project Site through the development of a high quality commercial project that revitalizes the site and provides a variety of uses, including a private membership club with guestrooms, restaurants, bars, lounge and dining spaces, screening rooms, a supper club, and a rooftop pool, along with publicly-accessible retail space, an art gallery, and creative office space. Alternative 4 also would not achieve most of the Project objectives, including the following:

- Provide a central location where creative and entrepreneurial patrons come together to meet, exchange ideas, dine, and participate in various cultural events.

- Develop a unique cultural use, which would contribute to the City's economy with an entertainment and creative arts-related venue that includes restaurants, bars, and hospitality uses.

- Maximize opportunities for a mix of retail, art gallery, creative offices, entertainment, hospitality, dining, bars, and guestrooms that would further the Sunset Specific Plan's goals to develop the area with a diversity of uses that support daytime and nighttime populations, along with goods and services for City residents.

- Contribute to and expand the diversity of iconic entertainment and cultural venues on the Sunset Strip.

- Support the community's vision of the Sunset strip as a high-quality international entertainment destination.

- Add to the eclectic urban environment of the Sunset Strip by creating an iconic building design that enhances the Sunset Boulevard experience and its dynamic urban environment.

- Complement the diverse mix of architectural styles, building heights, and uses along Sunset Boulevard.

- Maximize the number of new permanent jobs generated by the addition of new creative offices, restaurant and retail space, arts gallery and entertainment uses, bars, guestrooms, and fitness and spa facilities, helping to secure a strong and continuous tax base and supply the region with greater employment options.

Alternative 4 would meet the following Project objectives but not to the same extent as the proposed Project:

- Add to the diversity of visitor-serving uses available on the Sunset Strip.

- Enhance the pedestrian connections and activity along Sunset Boulevard through the development of an open and inviting building façade at the sidewalk level featuring a landscaped community plaza that engages the street and the neighborhood community.

- Provide significant new creative office space to enhance the City's supply of modern office environments that cater to and respond to the existing and future needs of businesses that will support the economic future and vitality of the City.

- Revitalize an under-utilized commercial property in the heart of the Sunset Strip.

- Construct an energy-efficient and environmentally conscious building by incorporating sustainable elements of design, construction, and operation to

achieve Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council or satisfy equivalent green building standards.

V. Alternatives

F. Environmentally Superior Alternative

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

Table V-1 on page V-8 provides a summary matrix that compares the impacts associated with the proposed Project with the impacts of each of the analyzed alternatives. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

Alternative 1, the No Project/No Build Alternative, would avoid all of the proposed Project's significant environmental impacts, including those related to noise and vibration during construction, Project-level off-site noise due to mobile noise sources during operation in comparison to existing conditions, and cumulative off-site noise due to mobile noise sources during operation. In addition, all of the proposed Project's remaining impacts (i.e., those that are less than significant and less than significant with mitigation) would not occur as Alternative 1 would not result in changes to the existing conditions, although it must be noted that the impacts from the proposed Project would be less than those of Alternative 1 with respect to surface water hydrology, surface water quality, and groundwater hydrology due to the benefits of the proposed Project to the Project Site and its surface water hydrology, surface water quality, and groundwater hydrology. However, Alternative 1 would not meet any of the Project objectives or the proposed Project's underlying purpose to maximize the development potential on the Project Site through the development of a high quality commercial project that revitalizes the site and provides a variety of uses, including a private membership club with guestrooms, restaurants, bars, lounge and dining spaces, screening rooms, a supper club, and a rooftop pool, along with publicly-accessible retail space, an art gallery, and creative office space.

As stated above, the CEQA Guidelines require the identification of an Environmentally Superior Alternative other than a No Project Alternative. Accordingly, in accordance with the CEQA Guidelines, a comparative evaluation of the remaining alternatives analyzed in this Draft EIR indicates that none of the alternatives considered

would *avoid or substantially lessen* the proposed Project's significant and unavoidable impacts related to on-site construction noise impacts (both Project-level and cumulative conditions), on-site construction vibration impacts (related to human annoyance), and cumulative off-site traffic noise during operation. Thus, in the absence of such an alternative, when compared with Alternatives 2 and 3, Alternative 4, Office/3-Story Alternative, would result in the greatest reduction in the proposed Project's already less-than-significant operational impacts related to the following:

- Views and shading due to a shorter building (i.e., three stories compared to the proposed Project's nine stories);
- Regional air pollutant emissions, localized air pollutant emissions, TAC emissions, GHG emissions due to the substantial reduction in trips (i.e., Alternative 4 would generate 1,875 fewer trips than those generated by the proposed Project);
- Off-site noise due to the substantial reduction in trips, including the reduction of the significant and unavoidable impact to less than significant related to Project-level off-site noise due to mobile noise sources during operation in comparison to existing conditions;
- Traffic due to the substantial reduction in trips (i.e., Alternative 4 would generate 1,875 fewer trips than those generated by the proposed Project);
- Water consumption, wastewater generation, solid waste generation due to a smaller development; and
- Energy consumption due to a smaller development and the substantial reduction in trips.

Among the three build alternatives (i.e., Alternative 2: Reduced Density/8-Story Alternative; Alternative 3: Reduced Density/7-Story Alternative; and Alternative 4: Office/3-Story Alternative), Alternative 4 is considered the environmentally superior alternative. As identified above, Alternative 4 would avoid the significant Project-level off-site noise due to mobile noise sources during operation in comparison to existing conditions but would not substantially lessen any of the other significant and unavoidable impacts (noise and vibration during construction and cumulative off-site noise due to mobile noise sources during operation), meet the underlying purpose of the proposed Project, or achieve many of the Project objectives.