CHAPTER 6
ALTERNATIVES

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

6.1 SELECTION OF ALTERNATIVES

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

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

6.1.1 Proposed Project

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

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

Project Summary

Table 6-1 includes a summary of the mixed-use structure that would be developed. (This table is also included in Section 2.6, Proposed Project Characteristics, of this EIR as Table 2-1.) The structure (gross building area) would be 214,483 square feet (sf) in gross building area with a maximum height of 71.5 feet. The project would include two levels of subterranean parking (totaling 75,483 sf), with 175 parking spaces. (The total structure size of 214,483 sf includes the square footage of the parking area.)

Table 6-1
Project Components

Hotel and Commercial Area	
Square Footage	63,104 sf
Rooms	86 units
Parking	51 stalls
Amenities	Fitness area
	Pool
	Hotel restaurant
	Valet
	Laundry
	Housekeeping
	Outdoor common areas
Residential	
Square Footage	50,172 sf (CC-2), 12,578 sf, totaling 62,750 sf
Units	70 units
Parking	79 stalls
Amenities	6 very low income units and 5 moderate income units
	38 studio apartments, 23 one-bedroom apartments, 9 two-bedroom apartments
	Outdoor common areas
Art Gallery	
Square Footage	1,381 sf
Parking	1 stall
Common Area	
Square Footage	14,368 sf
Excess Public Parking	
Parking	45 stalls (exceeds code required parking)
Restaurants	
Square Footage	3,756 sf
Parking	7 stalls
Amenities	Restaurant and outdoor dining

Note: sf = square feet.

Project Objectives

As described in Chapter 2, Project Description, of this EIR, the underlying purpose of the project is to provide a mixed-use project with hotel, commercial, and residential uses, and exceptional architectural design employing environmentally friendly practices along Santa Monica Boulevard within the east side of the City of West Hollywood. The proposed project would encourage pedestrian activity at the project site along Santa Monica Boulevard as well as provide excess parking at the project site to be used by the general public. The proposed mixed-use development would include residential, restaurant, and hotel uses, thus maximizing the efficiencies for local residents and reducing vehicle trips. In addition, the proposed project would accommodate the need for additional residential housing in the City and in the County of Los Angeles, including affordable housing, while supporting and promoting the economic vitality of the City. The following specific project objectives support the proposed project's underlying purpose:

1. Create an economically viable mixed use project along Santa Monica Boulevard in the City of West Hollywood, providing a full-service boutique hospitality use in the vicinity of complementary studio and creative office uses on the east side of the City of West Hollywood, thereby enhancing the east side's appeal as a visitor destination;
2. Provide a contemporary, high-quality design that exemplifies thoughtful urban in-fill development and contributes to the context of existing and future development;
3. Provide public parking in addition to required parking;
4. Provide housing and hospitality uses near alternative means of transportation, including mass transportation, with accessibility for commercial patrons arriving to the project site via a driveway on Santa Monica Boulevard;
5. Provide additional housing opportunities and contribute to the residential development of mixed-use areas by incorporating residential uses into an existing core of nearby community facilities, employment centers, retail goods and services, and restaurants to enhance the area's overall urban character;
6. Increase the City's rental housing stock for very low and moderate-income families;
7. Create a consistent pattern of development and uses along Santa Monica Boulevard that serves project residents and the surrounding community by redeveloping an underutilized site;
8. Provide jobs convenient to the existing labor pool living in and around the City and maximize the number of new permanent jobs generated by the new hotel and restaurant, helping to secure a strong and continuous tax base;
9. Maximize the number of temporary construction jobs created necessary to build the proposed project;

10. Maximize the site's economic value to the City by redeveloping and revitalizing an underperforming site;
11. Maximize new City revenues generated and contribute to its fiscal health with new sales, property and hotel occupancy taxes, thereby maximizing the direct and indirect fiscal and economic benefits for the City and the surrounding area;
12. Create a wide range of unit sizes, including affordable housing units, in close proximity to employment resources and public transportation;
13. Minimize the impact to the environment through the redevelopment of previously developed parcels;
14. Develop and encourage bicycle access and pedestrian-oriented uses by employing design features that improve the landscape and streetscape, making the area more pedestrian friendly, while ensuring necessary vehicular access in and out of the project site;
15. Provide adequate common open space and internal access within the project site to meet the needs of the proposed uses and users;
16. Provide improvements that encourage alternative and fuel-efficient forms of transportation (e.g., bicycle storage areas, preferential parking for low-emission/fuel-efficient vehicles and carpools/vanpools);
17. Promote sustainability, including measures to increase the efficient use of water and energy and the use of renewable resources while decreasing use of nonrenewable energy;
18. Implement green building design and construction practices capable of achieving Leadership in Energy and Environmental Design (LEED) Silver certification for the buildings within the project site.

Environmental Impacts of the Proposed Project

As discussed in detail in the Initial Study Checklist included in Appendix A to this EIR and in Chapter 3, Environmental Analysis, and Chapter 4, Cumulative Effects, the impact determinations for the proposed project are as follows:

No Impact

- Agricultural Resources
- Mineral Resources

Less-Than-Significant Impact

- Aesthetics
- Operational Air Quality

- Biological Resources
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials, including Wildfire
- Hydrology and Water Quality
- Land Use and Planning
- Population and Housing
- Public Services
- Recreation
- Transportation
- Utilities and Service Systems
- Energy

Less-Than-Significant Impact With Mitigation

- Construction Air Quality
- Cultural Resources
- Noise

As previously listed and as demonstrated throughout Chapter 3 and Chapter 4 of this EIR, the proposed project would not result in significant, unavoidable impacts. Impacts for all environmental categories were determined to be "less than significant with mitigation incorporated," "less than significant," or "no impact."

6.1.2 Alternatives Considered But Rejected

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

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

(ii) Infeasibility, or

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

Section 15126.6(f)(1) of the CEQA Guidelines states that "among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory

limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)." However, as stated in this subsection, no one of these factors establishes a fixed limit on the scope of reasonable alternatives.

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

Alternatives Sites

Pursuant to Section 15126.6(f)(2) of the CEQA Guidelines, the City considered the potential for alternative locations to the project. As stated in Section 15126.6(f)(2)(A), the key question and first step in analyzing alternative sites is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered in the EIR. While there are no significant and unavoidable impacts associated with the proposed project, the project is located directly adjacent to a preschool and residential uses. Mitigation measures are required in the categories of construction air quality and construction and operational noise to ensure that the proposed project's air quality and noise impacts are less than significant. Moving the project to a site that is not immediately adjacent to sensitive receptors (e.g., on a site that is surrounded by commercial uses) would reduce the effects of the project on sensitive receptors, particularly in the categories of construction air quality and noise. However, the City is largely built out in nature, and a variety of sensitive receptors are present throughout the City. As such, even if an alternate site were to be identified that is not immediately adjacent to a sensitive receptor, it is unlikely that such a site would be situated far enough from nearby sensitive receptors to substantially lessen the air quality and noise effects of the project on receptors in the area. Rather, it is likely that mitigation measures that are the same or similar to those required for the proposed project would be needed to address construction air quality and construction/operational noise effects at an alternate site. Furthermore, development at an alternate site would not necessarily reduce impacts to transportation and traffic, as such impacts would merely be relocated to other intersections within the City. Regardless of its location, the project would generally place similar demands on public services, utilities, and energy resources. For these reasons, while impacts to sensitive receptors in the categories of construction air quality and noise may be slightly reduced when compared to the proposed project, use of an alternative site would not likely result in a substantial reduction in the impacts of the project such that the significance determinations would change or such that mitigation measures would no longer be warranted. Alternative sites were ultimately rejected from further analysis in the EIR due to failure to meet project objectives, infeasibility, and inability to avoid significant environmental impacts.

Infeasibility. There are sites within the City of an approximately equivalent size to the project site that could be redeveloped with a mixed-use project; however, the project applicant does not control another commercial site within the eastern portion of the City of comparable land area that is available for development of the proposed project. One of the factors for feasibility of an alternative is "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site." Because the City is highly urbanized and is largely built out, obtaining another site of a similar size in a similar location (i.e., on the east side of West Hollywood, along Santa Monica Boulevard, and within the Santa Monica/Fairfax Transit District) is not considered feasible. The project site was selected for development of a mixed-use structure due to its proximity to alternative transportation, its proximity to Santa Monica Boulevard (a City-designated Pedestrian Destination Street), its proximity to diverse neighborhood-serving commercial and community services; and its proximity to existing neighborhoods. Relocating the project outside of the Santa Monica Boulevard corridor and outside of the Santa Monica/Fairfax Transit District would undermine the function, utility, and financial viability of the project.

Failure to Meet Objectives. Use of alternative sites would fail to achieve many of the project objectives, some of which are dependent on the location of the project. If the project were not located along Santa Monica Boulevard, it would not meet the objectives of creating a mixed-use development along Santa Monica Boulevard or of contributing to a consistent pattern of development along Santa Monica Boulevard. While many areas of the City are walkable, Santa Monica Boulevard has been designated as a "Pedestrian Destination Street," indicating that it is a popular area for walking to shops and restaurants. As such, situating the project away from Santa Monica Boulevard could diminish the project's ability to meet the objective of developing and encouraging pedestrian-oriented uses. Further, if the project were not located on the City's east side, it would not meet the objective of providing a full-service boutique hotel on the east side of the City and, therefore, would fail to meet the related objective of enhancing the east side's appeal as a visitor destination. If the project were not located near existing neighborhood-serving commercial uses and alternative transportation facilities, it would not meet the objectives of providing residential and hotel uses near transit services and within existing neighborhood-serving commercial areas, and it would decrease the project's ability to meet the objective of incorporating residential uses into an existing core of nearby community facilities, employment centers, retail goods and services, and restaurants. Conversely, if the project were not located near existing residential uses, the project would not maximize efficiencies for local residents or reduce vehicle trips to the same degree. As such, situating the project away from the confluence of commercial and residential uses would decrease its ability to achieve objectives related to pedestrian-oriented uses and development of mixed-use areas.

Environmental Impacts. The proposed project would not result in any significant environmental impacts. As such, moving the project to a different site would not avoid or substantially lessen any

of the significant impacts of the project, since no significant unavoidable impacts would occur as a result of the project.

6.2 ALTERNATIVES CARRIED FORWARD FOR CONSIDERATION

Pursuant to Section 15126.6 of the CEQA Guidelines, the City selected a reasonable range of alternatives to the project that would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen one or more of the significant effects of the project. As previously discussed, the project would not result in any significant and unavoidable environmental effects, and therefore alternatives are not required to avoid or substantially lessen any such effects. Nevertheless, based on the evaluation of potential alternatives that were considered but rejected in Section 6.1.2, four alternatives have been carried forward for further analysis as follows. Pursuant to Section 15126.6(d) of the CEQA Guidelines, sufficient information about each alternative has been included in the following descriptions to allow meaningful evaluation, analysis, and comparison with the proposed project.

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives is required to focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. While no significant and unavoidable impacts have been identified in association with the proposed project, the following alternatives would lessen at least one of the less-than-significant impacts of the proposed project that have been identified in Chapter 3 and Chapter 4 of this EIR, although not to the extent that no effects would occur.

6.2.1 Alternative 1 – No Project

Section 15126.6(e) of the CEQA Guidelines requires that an EIR evaluate the specific alternative of "no project" along with its impact. As stated in this section of the CEQA Guidelines, the purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project. As specified in Section 15126.6(e)(3)(B) of the CEQA Guidelines, the no project alternative for a development project consists of the circumstance under which a proposed project does not proceed. Section 15126.6(e)(3)(B) further states that "in certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, Alternative 1 assumes the proposed project would not proceed, no new permanent development or land uses would be introduced within the project site, and the existing environment would be maintained. The existing uses would continue to operate as they do currently. The existing commercial and residential uses would remain in place and operational, the existing

surface parking lots would be retained, no new buildings or parking areas would be constructed, and no landscaping or streetscape improvements would occur.

Ability to Meet Project Objectives

The No Project Alternative would not achieve any of the project objectives. It would not develop a mixed-use project along Santa Monica Boulevard within the east side of the City; it would not encourage additional pedestrian activity in the area; it would not include residential, restaurant, or hotel uses; and it would not maximize efficiencies or reduce vehicle trips for local residents. It would not enhance the east side's appeal as a visitor destination, it would not accommodate the need for additional residential housing, it would not increase the housing stock for very low and moderate-income families, and it would not situate housing and hospitality uses near alternative means of transportation. It would also fail to redevelop and revitalize an underutilized site, would not provide new jobs, would not generate new tax revenues, and would not maximize the site's economic value. Also, it would not improve the landscaping or streetscape of the site and, therefore, would not make the area more pedestrian friendly.

Comparison of Environmental Effects to the Proposed Project

Aesthetics

As discussed in Section 3.1, Aesthetics, the proposed project would result in visual changes at the project site; however, the proposed project would be consistent with the neighborhood as characterized in City's General Plan. There are no known conflicts with applicable zoning or other regulations governing scenic quality. Additionally, in accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone, which is the case for the proposed project, aesthetic impacts cannot be considered significant, and therefore, the analysis makes no judgment of the significance of any possible impacts under CEQA.

Under Alternative 1, no new construction would occur at the project site, and the site would continue to be used for commercial, residential, and parking uses. No visual changes would occur. However, because no aesthetic impact conclusions are made for the proposed project, Alternative 1 would not avoid or reduce any aesthetic impacts. Alternative 1's aesthetic impacts would be comparable to those associated with the proposed project. As explained in Section 3.1.2, Relevant Plans, Policies, and Ordinances, of this EIR, for qualified projects in a transit area zone (such as the proposed project and Alternative 1), aesthetic impacts cannot be considered significant impacts on the environment pursuant to Section 21099(d)(1). Therefore, the aesthetics analyses for the proposed project and for this alternative make no judgment of the significance of any possible impacts under CEQA.

Air Quality

As discussed in Section 3.2, Air Quality, construction and operation of the proposed project would not result in any significant air quality impacts. All impacts would be less than significant, and no mitigation is required.

Under Alternative 1, no new construction or operational changes would occur at the project site. The air quality emissions associated with the existing uses on the project site would remain unchanged. Given that the existing commercial, residential and parking uses are less intense than the uses associated with the proposed project and that no construction would occur, air quality impacts associated with Alternative 1 would be reduced when compared to the proposed project. While the project's air quality impacts would be less than significant, Alternative 1 would result in fewer air quality impacts than the proposed project.

Cultural Resources

As discussed in Section 3.3, Cultural Resources, construction and operational impacts to archaeological and paleontological resources, as well as human remains, can be reduced to less-than-significant levels through implementation of mitigation. No impacts to historical resources would occur.

Under Alternative 1, no new construction or operational changes would occur at the project site. Because no construction would occur, the potential to disturb previously unidentified archaeological and/or paleontological resources or human remains would be reduced when compared to the proposed project. While the project's impacts to cultural resources can be reduced to less-than-significant levels, Alternative 1 would result in fewer overall impacts to cultural resources than the proposed project.

Greenhouse Gas Emissions

As discussed in Section 3.4, Greenhouse Gas Emissions, construction and operation of the proposed project would result in less-than-significant greenhouse gas (GHG) emission impacts. All impacts would be less than significant, and no mitigation is required.

Under Alternative 1, no new construction or operational changes would occur at the project site. The GHG emissions associated with the existing uses on the project site would remain unchanged. Given that the existing commercial, residential and parking uses are less intense than the uses associated with the proposed project and that no construction would occur, GHG emissions impacts associated with Alternative 1 would be reduced when compared to the proposed project. While the project's GHG emissions impacts would be less than significant, Alternative 1 would result in fewer GHG emissions impacts than the proposed project.

Hazards and Hazardous Materials

As discussed in Section 3.5, Hazards and Hazardous Materials, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset or accident conditions. Additionally, the project would not emit hazardous emissions or handle hazardous materials or substances within one-quarter mile of an existing or proposed school. All hazards impacts associated with the proposed project would be less than significant.

Under Alternative 1, no new construction or operational changes would occur at the project site. Given that the existing commercial, residential and parking uses are less intense than the uses associated with the proposed project are not utilizing or emitting any hazardous materials or emissions, and that with implementation the proposed project, there would not be any use or emission of hazardous materials, impacts associated with Alternative 1 and the proposed project would be comparable.

Noise

As discussed in Section 3.6, Noise, construction and operational impacts of the proposed project would be potentially significant. However, with implementation of mitigation, all construction and operational noise impacts would be reduced to less-than-significant levels. Additionally, vibration impacts would be less than significant.

Under Alternative 1, no new construction or operational changes would occur at the project site. Because no construction would occur, the potential for the project to result in noise impacts upon nearby noise-sensitive receptors would be reduced. Additionally, because no operational changes would occur, the existing and less intense commercial, residential, and parking uses would result in less operational noise than the proposed project. While the project's noise impacts can be reduced to less-than-significant levels, Alternative 1 would result in fewer overall noise impacts to than the proposed project.

Public Services

As discussed in Section 3.7, Public Services, impacts to police protection, fire protection, and schools would be less than significant. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

Under Alternative 1, no new construction or operational changes would occur at the project site. Because no changes would occur to existing conditions, Alternative 1 would not change the demand for police, fire, or school services. While the proposed project would result in less than significant impacts to police, fire and school services, Alternative 1 would result in fewer public services impacts than the proposed project.

Transportation

As discussed in Section 3.8, Transportation, construction and operation of the proposed project would result in less-than-significant transportation impacts. All impacts would be less than significant, and no mitigation is required.

Under Alternative 1, no new construction or operational changes would occur at the project site. The transportation associated with the existing uses on the project site would remain unchanged. Given that the existing commercial, residential and parking uses are less intense than the uses associated with the proposed project and that no ,construction would occur, transportation impacts associated with Alternative 1 would be reduced when compared to the proposed project. While the project's transportation impacts would be less than significant, Alternative 1 would result in fewer transportation impacts than the proposed project.

Utilities and Service Systems

As discussed in Section 3.9, Utilities and Service Systems, construction and operation of the proposed project would result in less-than-significant impacts to water, wastewater, solid waste, energy, electricity, and telecommunications services.

Under Alternative 1, no new construction or operational changes would occur at the project site. The existing demand for utility services by the commercial, residential, and parking uses would remain unchanged. Given that these uses are less intense that those in the proposed project, no increase in demand for utilities would occur under Alternative 1. While the proposed project's utilities and service systems impacts would be less than significant, Alternative 1 would result in fewer utilities and service system impacts than the proposed project.

Energy

As discussed in Section 3.10, Energy, construction and operation of the proposed project would result in less-than-significant energy impacts. All impacts would be less than significant, and no mitigation is required.

Under Alternative 1, no new construction or operational changes would occur at the project site. The energy consumption associated with the existing uses on the project site would remain

unchanged. Given that the existing commercial, residential, and parking uses are less intense than the uses associated with the proposed project and that no construction would occur, energy impacts associated with Alternative 1 would be reduced when compared to the proposed project. While the project's energy impacts would be less than significant, Alternative 1 would result in fewer energy impacts than the proposed project.

6.2.2 Alternative 2 – Reduced Project

The Reduced Project Alternative would result in the construction of approximately 186,254 total gross building area with a height of 71.5 feet. The structure would consist of a 74-room hotel, restaurant, 73 residential units, and an art gallery. Construction of Alternative 2 would involve demolition of the existing 10,000-square-foot commercial building located on the existing 7811 Santa Monica Boulevard parcel, the parking lot adjacent to the commercial building, the City-operated parking lot located along Orange Grove Avenue. However, in contrast to the proposed project, Alternative 2 would not include demolition of the existing multifamily structure fronting Ogden Drive, which is located on the eastern portion of the project site.

The characteristics of Alternative 2 are summarized in Table 6-2, below. The proposed building would include approximately 64,933 sf of hotel and commercial space with a total of 74 hotel rooms, 45,501 sf of residential space, 13,638 sf of common areas, and 61,238 sf of parking area. Of the 73 residential units (60 studios; 13 one-bedroom), 11 units would be affordable housing units, including six very low-income units and five moderate-income units. Alternative 2 would have a Floor Area Ratio (FAR) of 3.38, similar to the proposed project and slightly less than what is allowed for the project site. Approximately 118 parking spaces, at ground level and in two subterranean parking levels, would be available to serve the residential and commercial uses, with approximately 32 additional parking spaces available for public parking, totaling 150 provided parking spaces.

Access to the project site under Alternative 2 would be available from two separate driveways: one on Santa Monica Boulevard and one on Orange Grove Avenue. The Reduced Project Alternative would be accessible for hotel guests and the public from Santa Monica Boulevard and North Orange Grove Avenue. The entrance on Santa Monica Boulevard would provide point of ingress for commercial patrons arriving at the project site. Pedestrians could access the site via North Orange Grove Avenue or from Santa Monica Boulevard.

Table 6-2
Alternative 2 Components

Hotel and Commercial Area	
Square Footage	64,933 sf
Rooms	74 units

Table 6-2
Alternative 2 Components

Parking	37 stalls
Amenities	Fitness area
	Pool
	Hotel restaurant
	Valet
	Laundry
	Housekeeping
	Outdoor common areas
Residential	
Square Footage	45,501 sf
Units	73 units – 60 studios; 13 one-bedroom units; no two- and three-bedroom units
Parking	73 stalls
Amenities	6 very low-income units and 5 moderate-income units - 9 studio apartments, 2 one-bedroom apartments
	Laundry, outdoor common areas
Art Gallery	
Square Footage	1,381 sf
Parking	1 stall
Common Area	
Square Footage	13,638 sf
Excess Public Parking	
Parking	32 stalls (exceeds code required parking)
Restaurants	
Square Footage	3,756 sf
Parking	7 stalls
Amenities	Restaurant and outdoor dining

Notes: sf = square feet.

Ability to Meet Project Objectives

Alternative 2 would meet the project objectives since it would establish a mixed-use building on the project site with the same land use types and design features as the proposed project. However, this alternative would decrease the extent to which the project meets objectives pertaining to parking, housing opportunities, and redevelopment. While both the proposed project and Alternative 2 would provide excess parking for the general public through a Parking Use Permit, Alternative 2 would provide 13 fewer excess parking spaces for public use. As such, it would achieve the objective of providing public parking but to a lesser degree than the proposed project. While both the proposed project and Alternative 2 would increase the residential housing available on the project site, Alternative 2 would provide three additional housing units when compared to the proposed project; however, the overall sizes of the housing

units would be reduced when compared to the proposed project. Alternative 2 would still meet objectives of providing housing near alternative means of transportation, contributing to the residential development of mixed-use areas, increasing the City's rental housing stock for very low and moderate income families, and creating a wide range of unit sizes through the provision of studios and one-bedroom units. Alternative 2, as with the proposed project, would provide 6 very low-income units and 5 moderate-income units. However, Alternative 2 would not involve redevelopment of the eastern section of the project site (i.e., the parcel that fronts Ogden Drive), nor would Alternative 2 provide a separate, project-resident only access driveway along Ogden Drive because the residential parcel fronting Ogden Drive would not be included as part of this alternative. As such, Alternative 2 would not meet the objective of redeveloping an underutilized site to the same degree as the proposed project.

Comparison of the Environmental Effects to the Proposed Project

This alternative would develop a mixed-use building on the project site in the same manner as the proposed project. The mixed-use hotel building that would be developed under Alternative 2 would also have the same land uses, height, and design features as the building that would be developed under the proposed project. As such, the types of impacts would be similar to those of the proposed project. However, Alternative 2 would not involve construction on the eastern portion of the project site on the parcel along Ogden Drive. The existing multifamily residential structure on that portion of the project site would remain in place. The following is a detailed analysis comparing impacts from the proposed project with impacts from Alternative 2 for each environmental issue area evaluated within this EIR.

Aesthetics

As discussed in Section 3.1, the proposed project would result in visual changes at the project site; however, the proposed project would be consistent with the neighborhood as characterized in City's General Plan. There are no known conflicts with applicable zoning or other regulations governing scenic quality. Additionally, in accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone, which is the case for the proposed project, aesthetic impacts cannot be considered significant, and therefore, the analysis makes no judgment of the significance of any possible impacts under CEQA.

As with the proposed project, this alternative would not result in significant impacts related to visual character/quality, light and glare, or shade/shadow. Impacts to visual character/quality would be similar to the proposed project during construction, since the appearance of the site would be generally similar during construction (i.e., construction equipment would be present, and grading and demolition activities would occur). During operation, the appearance of the building developed on the site would also be similar to that of the proposed project, and the maximum

height of the building would be the same (71.5 feet). The building developed under Alternative 2 would have slightly less mass compared to the proposed project and, therefore, may have reduced visual prominence. In particular, since the portion of the project site fronting Ogden Drive would not be developed under Alternative 2, the project's visual prominence and aesthetic effects along Ogden Drive would be reduced. As with the proposed project, Alternative 2 would be a transit-oriented project that falls within the definition of a transit area project, as identified in Section 21099 of the Public Resources Code. As explained in Section 3.1.2, Relevant Plans, Policies, and Ordinances, of this EIR, for qualified projects in a transit area zone (such as the proposed project and Alternative 2), aesthetic impacts cannot be considered significant impacts on the environment pursuant to Section 21099(d)(1). Therefore, the aesthetics analyses for the proposed project and for this alternative make no judgment of the significance of any possible impacts under CEQA.

Air Quality

As discussed in Section 3.2, construction and operation of the proposed project would not result in any significant air quality impacts. All impacts would be less than significant, and no mitigation is required.

Impacts to air quality would be reduced under Alternative 2. While similar construction activities would occur, the duration of construction and the intensity of construction activities would be reduced, since the building would be smaller in size, and no construction would occur on the parcel fronting Ogden Drive.

During operation, the land use intensity of the project site would be reduced as compared to the proposed project, since there would be fewer hotel units. Therefore, operational air emissions would decrease, since fewer daily vehicle trips would occur and other sources (such as the use of consumer products, architectural coatings, and fuels for space heating and cooking appliances) would be reduced. While the proposed project would result in less-than-significant air quality impacts, because Alternative 2 uses would be less intense than the proposed project, Alternative 2 would result in fewer overall air quality impacts.

Cultural Resources

As discussed in Section 3.3, construction and operational impacts to archaeological and paleontological resources, as well as human remains, can be reduced to less-than-significant levels through implementation of mitigation. No impacts to historical resources would occur.

Impacts to cultural resources would be similar to those of the proposed project. Under Alternative 2, the structures along Ogden Drive would not be demolished. As explained in Section 3.3 of this EIR, these structures are not considered historical resources under CEQA. Impacts to historical, built-environment resources would remain less than significant under Alternative 2. Under

Alternative 2, the potential to uncover buried archaeological resources, paleontological resources, or human remains at the parcel fronting Ogden Drive would be eliminated. However, effects to such resources could still occur during excavation in the remaining areas of the project site. As with the proposed project, impacts could be potentially significant in the event that unknown resources or remains were to be uncovered during excavation. The same mitigation measures provided for the proposed project would reduce these impacts to below a level of significance with implementation of these measures, impacts to archaeological resources, paleontological resources, and human remains would be less than significant with mitigation incorporated. As such, Alternative 2 would result in comparable impacts to the proposed project.

Greenhouse Gas Emissions

As discussed in Section 3.4, construction and operation of the proposed project would result in less than significant GHG emission impacts. All impacts would be less than significant, and no mitigation is required.

The GHG emissions of Alternative 2 would be less than those of the proposed project, since the land use intensity of the site would decrease. The building developed under Alternative 2 would be smaller, and fewer hotel units would be developed. As such, energy use, resource use, and vehicular trips to and from the site would all decrease. The sustainability measures identified for the proposed project in Section 2.4 of this EIR would still be implemented for Alternative 2. While Alternative 2 would generate less GHG emissions, it would still increase GHG emissions relative to existing conditions. For these reasons, both construction and operational impacts would remain less than significant but Alternative 2 would result in fewer overall GHG emissions impacts than the proposed project.

Hazards and Hazardous Materials

As discussed in Section 3.5, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset or accident conditions. Additionally, the project would not emit hazardous emissions or handle hazardous materials or substances within one-quarter mile of an existing or proposed school. All hazards impacts associated with the proposed project would be less than significant.

Impacts associated with hazards and hazardous materials would be similar to those of the proposed project. The types of materials used during construction and operation would be generally the same, although slightly less volume would be required due to the decrease in construction intensity/duration and the slight decrease in operational land use intensity as compared with the proposed project. Impacts involving transport, use, and disposal of hazardous materials would remain less than significant. As identified in Section 3.5.4, Impacts

Analysis, of this EIR, the multifamily residential building located along Ogden Drive has the potential to contain asbestos-containing materials and lead-based paints. Under Alternative 2, this building would remain in place. As such, hazardous building materials with the potential to cause hazards to the public or the environment would not be released during demolition of the multifamily residential building along Ogden Drive. While Alternative 2 would reduce the potential for upset and accident conditions involving the release of hazardous materials to the environment, impacts would not decrease to the extent that alternative would have no impact, since hazardous materials would still be used during construction and operation of the project. Impacts would remain less than significant.

Because the project site would remain generally the same as that of the proposed project, impacts involving proximity to schools would be similar to those of the proposed project. However, effects would be slightly reduced, since the multifamily residential building along Ogden Drive, which has the potential to contain asbestos-containing materials and lead-based paints, would not be demolished under Alternative 2. (As previously explained, any hazardous building materials that may be present in this structure would not have the potential to be released to the environment under Alternative 2.) Impacts to hazards and hazardous materials would remain less than significant and would be reduced when compared to the proposed project.

Noise

As discussed in Section 3.6, construction and operational impacts of the proposed project would be potentially significant. However, with implementation of mitigation, all construction and operational noise impacts would be reduced to less-than-significant levels. Additionally, vibration impacts would be less than significant.

Alternative 2 would reduce noise impacts during certain construction phases, since no construction would occur at the parcel along Ogden Drive. Additionally, the duration and intensity of construction would slightly decrease relative to the proposed project, since the project would be smaller in size under Alternative 2. However, construction would still occur adjacent to Fountain Day School and residential sensitive receptors, including the multifamily residential building along Ogden Drive that would remain under Alternative 2. While construction duration and intensity would slightly decrease under Alternative 2, the types of equipment required for the project would be the same or similar as those required for the proposed project. As such, the maximum amount of construction noise that is experienced at Fountain Day School and adjacent residences would remain generally the same under Alternative 2. Therefore, Alternative 2 would still result in potentially significant impacts in the category of construction noise. However, as with the proposed project, mitigation measures would reduce potentially significant construction-related noise impacts to below a level of significance

Operational noise impacts from off-site traffic would slightly decrease along some roadways due to the overall decrease in trip generation. However, the trip distribution would be altered in such a way that all egress trips would occur on Orange Grove Avenue, since no access would be provided to the project site via Ogden Drive, and the driveway along Santa Monica Boulevard would remain ingress-only. As such, Alternative 2 has the potential to increase traffic and associated off-site noise along Orange Grove Avenue when compared to the proposed project. Conversely, off-site noise from traffic would decrease along Ogden Drive. As with the proposed project, mitigation measures would reduce potentially significant operational noise impacts to below a level of significance. As such, and similar to the proposed project, impacts would be less than significant with mitigation incorporated, and overall noise impacts associated with Alternative 2 would be comparable to those associated with the proposed project.

Public Services

As discussed in Section 3.7, impacts to police protection, fire protection, and schools would be less than significant. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Alternative 2 would result in an overall reduction in the intensity of development on the project site. While demands on public services would still increase relative to existing conditions, they would increase to a lesser extent as compared with the proposed project. As such, demands for fire protection, police protection, and schools would be slightly reduced as compared to the proposed project but would still increase relative to existing conditions. As with the proposed project, Alternative 2 would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities. Impacts would remain less than significant, yet Alternative 2 would result in fewer overall public services impacts when compared to the proposed project.

Transportation

As discussed in Section 3.8, construction and operation of the proposed project would result in less-than-significant transportation impacts. All impacts would be less than significant, and no mitigation is required.

Alternative 2 would result in 12 fewer hotel rooms yet three additional residential units. Overall, the development footprint would be reduced under Alternative 2 when compared to the proposed project because the parcel along Ogden Drive would not be included. As such, during construction, the number of truck trips and vehicle trips for workers would decrease since the construction duration, and intensity would be slightly reduced in comparison to the proposed project.

During operation, the size of the hotel, art gallery, and restaurant uses would remain the same as the proposed project. The anticipated number of trips generated by Alternative 2 is shown in Table 6-3. As shown in Table 6-3, Alternative 2 would result in 84 fewer daily trips than the proposed project, and four trips less during the AM Peak, six fewer trip during the Midday Peak, and seven fewer trips during the PM Peak.

Under Alternative 2, with the elimination of the Ogden Drive parcel, all access to the project site would be limited to Santa Monica Boulevard (ingress only) and Orange Grove Avenue (ingress and southbound egress only). As such, with the change in traffic patterns to and from the project site, and with the elimination of the third access point, there may be the potential for new and/or different impacts to occur along roadway segments and at intersections in the vicinity of the project site. However, as shown in Table 6-4, Level of Service (LOS) would remain acceptable at all intersections, and no significant impacts at intersections would occur under Alternative 2. Additionally, as shown in Table 6-5, roadway segment volumes would not exceed thresholds.

Given that the overall number of trips would be reduced under Alternative 2 and that no new significant impacts to intersections or roadway segments would occur under Alternative 2, impacts would be reduced when compared to the proposed project.

Regarding roadway hazards, impacts would be similar to the proposed project under Alternative 2. However, the driveway along Ogden Drive that would be constructed under the proposed project would not be constructed under Alternative 2. While no significant safety effects from vehicle queuing or vehicle turning were identified at this driveway, the potential for any additional queuing or turning from a driveway along Ogden Drive would be eliminated under Alternative 2. However, impacts would remain less than significant, as Alternative 2 would still introduce new roadway features (e.g., driveways along Santa Monica Boulevard and Orange Grove Avenue). Alternative 2 would not introduce any new conflicts with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities because the site would be developed and would continue to allow access to alternative forms of transportation and provide bicycle and pedestrian facilities. As such, impacts would remain less than significant and reduced when compared to the proposed project.

Table 6-3
Alternative 2 – Trip Generation Summary

Land Use	ITE Code	Intensity	Units	Daily Total	AM Peak			Midday Peak			PM Peak		
					Total	*In*	*Out*	*Total*	*In*	*Out*	*Total*	*In*	*Out*
Alternative 2 Trip Generation Rates													
Quality Restaurant[1]	931	-	-	83.84	0.73	80%	20%	4.47	80%	20%	7.80	67%	33%
Museum	580	-	-	6.60	0.28	86%	14%	0.66	71%	29%	0.18	16%	84%
Hotel	310	-	-	8.36	0.47	59%	41%	0.61	58%	42%	0.60	51%	49%
Multifamily (Mid-Rise)	221	-	-	5.44	0.36	26%	74%	0.32	27%	73%	0.44	61%	39%
Gym	492	-	-	28.82	1.31	51%	49%	1.40	46%	54%	3.45	57%	43%
Proposed Project Trip Generation Estimates													
Quality Restaurant	931	3.756	k.s.f	315	3	2	1	17	14	3	29	19	10
Art Gallery	580	1.381	k.s.f	9	1	1	0	1	1	0	1	0	1
Hotel	310	74	rooms	619	35	21	14	45	26	19	44	22	22
Multifamily (Mid-Rise)	221	73	units	397	26	7	19	23	6	17	32	20	12
Proposed Project Subtotal				*1,340*	*65*	*31*	*34*	*86*	*47*	*39*	*106*	*61*	*45*
Internal Capture													
Restaurant (25%)				-79	-1	-1	0	-5	-4	-1	-8	-5	-3
External Project Trips				1,261	64	30	34	81	43	38	98	56	42
Former Use Trip Credit													
Gym	492	10.000	k.s.f	-288	-13	-7	-6	-14	-6	-8	-35	-20	-15
Multifamily (Mid-Rise)	221	7	units	-38	-3	-1	-2	-2	-1	-1	-3	-2	-1
Former Use Trip Credit				-326	-16	-8	-8	-16	-7	-9	-38	-22	-16
Alternative 2 Total				**935**	**48**	**22**	**26**	**65**	**36**	**29**	**60**	**34**	**26**
Proposed Project Total				**1,019**	**52**	**25**	**27**	**71**	**40**	**31**	**67**	**38**	**29**
Difference (Compared to Proposed Project)				**-84**	**-4**	**-3**	**-1**	**-6**	**-4**	**-2**	**-7**	**-4**	**-3**

Trip generation rates based on ITE Trip Generation Manual, 10th Edition, Institute of Transportation Engineers, 2012, unless otherwise noted. Midday Peak rates from Peak Hour of Generator.

[1] Quality Restaurant AM In/Out ratio from AM Peak Hour of Generator.

Table 6-4
Alternative 2 – Intersection Level of Service

	Study Intersections	Peak Hour	Existing Conditions V/C or Delay	Existing Conditions LOS	Existing with Alternative 2 V/C or Delay	Existing with Alternative 2 LOS	Significance Threshold	Change in V/C or Delay	Sig Impact?
City of West Hollywood									
1	Fairfax Avenue & Fountain Avenue (A)	AM	28.8	C	28.8	C	-	0.0	No
		Noon	28.0	C	28.0	C	-	0.0	No
		PM	61.5	**E**	62.9	**E**	5.0	1.4	No
2	Orange Grove Avenue & Fountain Avenue (A)*	AM	18.7	C	19.5	C	-	0.8	No
		Noon	1.8	A	1.8	A	-	0.0	No
		PM	9.6	A	10.5	B	-	0.9	No
3	Ogden Drive and Fountain Avenue (A)*	AM	8.7	A	9.1	A	-	0.4	No
		Noon	2.2	A	2.2	A	-	0.0	No
		PM	130.4	**F**	130.4	**F**	5.0	0.0	No
4	Fairfax Avenue & Santa Monica Boulevard	AM	49.8	D	50.9	D	12.0	1.1	No
		Noon	36.9	D	38.0	D	12.0	1.1	No
		PM	59.6	**E**	62.1	**E**	8.0	2.5	No
5	Orange Grove Avenue & Santa Monica Boulevard*	AM	1.0	A	1.2	A	-	0.2	No
		Noon	0.5	A	0.8	A	-	0.3	No
		PM	0.7	A	0.9	A	-	0.2	No
6	Ogden Drive and Santa Monica Boulevard (North Leg)*	AM	1.4	A	1.4	A	-	0.0	No
		Noon	1.2	A	1.3	A	-	0.1	No
		PM	3.7	A	3.7	A	-	0.0	No
6	Ogden Drive and Santa Monica Boulevard (South Leg)*	AM	1.5	A	1.5	A	-	0.0	No
		Noon	0.7	A	0.7	A	-	0.0	No
		PM	1.9	A	1.9	A	-	0.0	No
7	Genesee Avenue & Santa Monica Boulevard	AM	8.9	A	8.9	A	-	0.0	No
		Noon	7.2	A	7.3	A	-	0.1	No
		PM	9.5	A	9.6	A	-	0.1	No
8	Fairfax Avenue & Romaine Street*	AM	35.3	**E**	36.9	**E**	5.0	1.6	No
		Noon	2.9	A	3.0	A	-	0.1	No
		PM	46.2	**E**	49.8	**E**	5.0	3.6	No
City of Los Angeles									
1	Fairfax Avenue & Fountain Avenue (A)	AM	0.644	B	0.645	B	-	0.001	No
		PM	0.840	D	0.847	D	0.020	0.007	No

LOS = Level of Service, V/C = Volume-to-Capacity Ratio.
* Unsignalized Intersections
(A) Shared Intersection

Table 6-5
Alternative 2 – Roadway Segment Volumes

Segment			Existing Daily Traffic Volumes	Project Only	Existing w/ Project Daily Traffic Volumes	Significance Threshold	Increase (%)	Significant Impact?
Future with Project Roadway Segment Volumes								
1	Orange Grove Avenue	Between Fountain Avenue and Santa Monica Boulevard	2,022	2,146	158	2,304	10%	7.4%
2	Ogden Drive	Between Fountain Avenue and Santa Monica Boulevard	1,976	2,098	0	2,098	10%	0.0%
Existing with Alternative 2 Roadway Segment Volumes								
1	Orange Grove Avenue	Between Fountain Avenue and Santa Monica Boulevard	2,022	158	2,180	10%	7.8%	No
2	Ogden Drive	Between Fountain Avenue and Santa Monica Boulevard	1,976	0	1,976	12%	0.0%	No

Utilities and Service Systems

As discussed in Section 3.9, construction and operation of the proposed project would result in less-than-significant impacts to water, wastewater, solid waste, energy, electricity, and telecommunications services.

Alternative 2 would result in an overall reduction in the intensity of development on the project site. As such, wastewater generation, solid waste production, and water use would slightly decrease relative to the proposed project. As with the proposed project, Alternative 2 would not exceed wastewater treatment requirements or exceed the conveyance or treatment capacity of existing sewage systems or landfills. While the demand for utilities and the impact on service systems would decrease due to the decrease in development intensity at the site, Alternative 2 would still increase demands relative to existing conditions. Impacts would remain less than significant, yet Alternative 2 would result in fewer overall utilities and service system impacts when compared to the proposed project.

Energy

As discussed in Section 3.10, construction and operation of the proposed project would result in less-than-significant energy impacts. All impacts would be less than significant, and no mitigation is required.

Energy consumption under Alternative 2 would slightly decrease, due to the decreased intensity of construction and the overall reduction in the intensity of development on the project site. However, Alternative 2 would still result in additional energy consumption at the project site during construction and operation when compared to existing energy demands. As with the proposed project, energy impacts would be less than significant, yet Alternative 2 would result in fewer overall energy compared when compared to the proposed project.

6.2.3 Alternative 3 – No Hotel

Alternative 3 would involve construction and operation of a mixed-use structure of approximately 247,876 sf with a maximum height of 71.5 feet. The characteristics of the mixed-use building that would be developed under Alternative 3 are listed in Table 6-6, below. As shown in this table, the building would consist of a restaurant, 156 residential units, and an art gallery. No hotel rooms would be constructed.

The proposed building would include approximately 5,137 sf of commercial space, approximately 122,854 sf of residential space, approximately 21,115 sf of residential common area, and approximately 108,080 sf of parking area. Of the 156 residential units (120 studios; 27 one-bedroom; 9 two-bedroom), 23 units would be affordable housing units, including 12 very low-

income units and 11 moderate-income units. The building heights for the No Hotel Alternative would range up to six stories above ground, up to 71.5 feet above grade in certain areas, with three subterranean levels of parking. Alternative 3 would have a FAR of 3.38, similar to the proposed project and slightly less than what is allowable for the project site. Because of the removal of the hotel component, parking requirement reductions for commercial uses would be removed; and rooftop hotel amenity space would be identified as residential lobby/recreation. Approximately 179 parking spaces, at ground level and in three subterranean levels, would be available to serve residential and commercial uses, with approximately 45 additional parking spaces available for public parking, totaling 224 parking spaces.

Access to the project site would be available from three separate driveways: one on Santa Monica Boulevard, one on Orange Grove Avenue, and one on Ogden Drive. As with the proposed project, Alternative 3 would be accessible for residents and the public from Santa Monica Boulevard and North Orange Grove Avenue with separate vehicular ingress/egress for residents only along Ogden Drive. Pedestrians could access the site via North Orange Grove Avenue, Santa Monica Boulevard, or Ogden Drive.

Construction of Alternative 3 would involve demolition of the existing 10,000 sf commercial building located on the existing 7811 Santa Monica Boulevard parcel, the parking lot adjacent to the commercial building, the parking lot located along Orange Grove Avenue, and the multifamily structure located on the parcel along Ogden Drive.

Table 6-6
Alternative 3 Components

Commercial Area	
Square Footage	5,137 sf
Parking	14 stalls
Amenities	Valet parking
	Outdoor amenities
Residential	
Square Footage	122,854 sf
Units	156 total units – 120 studios; 27 one-bedroom; 9 two-bedroom
Parking	165 stalls
Amenities	Affordable Housing: 12 very low-income units and 11 moderate-income units; 18 studios, 4 one-bedroom, and 1 two-bedroom unit
	Fitness Area
	Pool
	Laundry
	Other amenities

Table 6-6
Alternative 3 Components

Art Gallery	
Square Footage	1,381 sf
Parking	1 stall
Common Area	
Square Footage	21,115 sf
Excess Public Parking	
Parking	45 stalls
Restaurants	
Square Footage	3,756 sf
Parking	13 stalls
Amenities	Restaurant and outdoor dining

Notes: sf = square feet.

Ability to Meet Project Objectives

This alternative would meet some of the project objectives, since it would establish a mixed-use building along Santa Monica Boulevard and on the east side of the City. However, this alternative would fail to meet any of the objectives pertaining to providing hospitality uses in the project area, including the objectives of providing a hospitality use in the vicinity of complementary studio and creative office uses; providing a full-service boutique hotel on the east side of the City; enhancing the east side's appeal as a visitor destination; and providing hospitality uses near alternative means of transportation. This alternative would meet the objectives pertaining to economic benefits but to a lesser degree when compared to the proposed project. Removing the hotel use and increasing the number of residential units from 70 to 156 would decrease the number of permanent jobs that would be available on the site and would eliminate the ability of the project to generate hotel occupancy taxes. As such, while Alternative 3 would still redevelop an underutilized site, it may not meet the objective of maximizing the site's economic value to the same degree as the proposed project, due to the absence of the hotel uses. Conversely, Alternative 3 would meet objectives pertaining to housing to a greater degree than the proposed project, since it would provide 86 more residential units than the proposed project, including 6 more very low income units and 6 more moderate income units. As such, Alternative 3 would increase the degree to which the project would accommodate the need for additional residential housing in the City and in the County of Los Angeles, including affordable housing. It would also provide more housing near alternative means of transportation and would contribute more greatly to the residential development of mixed-use areas, as compared to the proposed project.

Comparison of the Environmental Effects to the Proposed Project

This alternative would develop a mixed-use building on the project site in generally the same manner as the proposed project. The mixed-use building that would be developed under Alternative 3 would have similar land uses as the building that would be developed under the proposed project, except that the 86 units that are planned for hotel use under the proposed project would be residential in nature. As such, Alternative 3 would result in 86 more residential units than the proposed project, for a total of 156 residential units. The mix of residential units under this Alternative would include 120 studios, 27 one-bedroom units, and 9 two-bedroom units, which equates to 82 more studios and 4 more one-bedroom units than the proposed project. Alternative 3 would have 55 more parking spaces than the proposed project and the same number of spaces available for general public use through the Parking Use Permit. The building would have the same maximum height as the proposed project (71.5 feet) and would involve demolition of the same existing structures as the proposed project. The types of impacts for Alternative 3 would be generally similar to those of the proposed project. The following details each environmental issue area evaluated within this EIR.

Aesthetics

As discussed in Section 3.1, the proposed project would result in visual changes at the project site; however, the proposed project would be consistent with the neighborhood as characterized in City's General Plan. There are no known conflicts with applicable zoning or other regulations governing scenic quality. Additionally, in accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone, which is the case for the proposed project, aesthetic impacts cannot be considered significant, and therefore, the analysis makes no judgment of the significance of any possible impacts under CEQA.

As with the proposed project, this alternative would not result in significant impacts related to visual character/quality, light and glare, or shade/shadow. The appearance of the building developed on the site would also be similar to that of the proposed project. While the building developed under Alternative 3 would decrease slightly in mass due to the reduction in size, its height would remain the same relative to the proposed project (maximum of 71.5 feet). Alternative 3 would be a transit-oriented project that falls within the definition of a transit area project, as identified in Section 21099 of the Public Resources Code. As explained in Section 3.1.2 of this EIR, for qualified projects in a transit area zone (such as the proposed project and this alternative), aesthetic impacts cannot be considered significant impacts on the environment pursuant to Section 21099(d)(1). Therefore, the aesthetics analyses for the proposed project and for this alternative make no judgment of the significance of any possible impacts under CEQA.

Air Quality

As discussed in Section 3.2, construction and operation of the proposed project would not result in any significant air quality impacts. All impacts would be less than significant, and no mitigation is required.

Impacts to air quality would be reduced under Alternative 3. While similar construction activities would occur, the duration of construction and the intensity of construction activities would be reduced, since the building would be smaller in size and no construction would occur on the parcel fronting Ogden Drive.

During operation, the land uses on the project site would change, as the proposed hotel units would be replaced with residential units, causing the permanent population on the project site to increase when compared to the proposed project. Additionally, commercial and restaurant areas would increase relative to the proposed project. However, as outlined under Transportation and Table 6-7, below, the overall number of vehicle trips associated with Alternative 3 would be reduced when compared to the proposed project. Given that the proposed project would result in less-than-significant impacts and that Alternative 3 would result in fewer operational vehicle trips than the proposed project, air quality impacts under Alternative 3 would continue to be less than significant and would be reduced overall when compared to the proposed project.

Cultural Resources

As discussed in Section 3.3, construction and operational impacts to archaeological and paleontological resources, as well as human remains, can be reduced to less-than-significant levels through implementation of mitigation. No impacts to historical resources would occur.

Impacts to cultural resources would be similar to those of the proposed project. The same existing structures that are proposed for demolition under the proposed project would be demolished under Alternative 3. As explained in Section 3.3, the on-site structures are not considered historical resources under CEQA. As such, impacts to historical, built-environment resources would remain less than significant under Alternative 3. Under Alternative 3, the potential to uncover buried archaeological resources, paleontological resources, and/or human remains would also be the same, as the footprint of ground disturbance and the depth of excavation would be generally the same as the proposed project. As with the proposed project, impacts could be potentially significant in the event that unknown resources or remains were to be uncovered during excavation. The same mitigation measures provided for the proposed project would reduce these impacts to below a level of significance. With implementation of these measures, impacts to archaeological resources, paleontological resources, and human remains would be less than significant with mitigation incorporated, and impacts under Alternative 3 would be comparable to those of the proposed project.

Greenhouse Gas Emissions

As discussed in Section 3.4, construction and operation of the proposed project would result in less than significant GHG emission impacts. All impacts would be less than significant, and no mitigation is required.

GHG emissions generated during construction for Alternative 3 may slightly decrease relative to the proposed project due to the reduction in building size and due to the overall reduction in the number of vehicle trips (see Table 6-7). The sustainability measures identified for the proposed project in Section 2.4 of this EIR would still be implemented for Alternative 3. Given that the proposed project would result in less than significant impacts and that Alternative 3 would result in fewer operational vehicle trips than the proposed project, GHG emission impacts under Alternative 3 would continue to be less than significant and would be reduced overall when compared to the proposed project.

Hazards and Hazardous Materials

As discussed in Section 3.5, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset or accident conditions. Additionally, the project would not emit hazardous emissions or handle hazardous materials or substances within one-quarter mile of an existing or proposed school. All hazards impacts associated with the proposed project would be less than significant.

Impacts would be similar to those of the proposed project. The types of materials used during construction and operation would be generally the same, although slightly less volume would be required due to the decrease in construction intensity/duration. Impacts involving transport, use, and disposal of hazardous materials would remain less than significant. Because similar types and quantities of hazardous materials would be used, the potential for upset and accident conditions involving the release of hazardous materials to the environment would be similar to those of the proposed project. Impacts would remain less than significant. Because the project location and the types of hazardous materials that would be used for Alternative 3 would be generally the same as the proposed project, impacts involving the use or potential release of hazardous materials near schools would remain less than significant, and impacts under Alternative 3 would be comparable to those of the proposed project.

Noise

As discussed in Section 3.6, construction and operational impacts of the proposed project would be potentially significant. However, with implementation of mitigation, all construction and

operational noise impacts would be reduced to less-than-significant levels. Additionally, vibration impacts would be less than significant.

Construction noise for Alternative 3 would be similar to that of the proposed project, because the area of construction would be the same and the types of construction equipment required would be the same. The slight decrease in building size under Alternative 3 may result in a slight reduction in the duration and intensity of construction. However, this slight change would not likely result in a noticeable or appreciable reduction in construction noise. As with the proposed project, construction would still occur adjacent to Fountain Day School and residential sensitive receptors, including the multifamily residential buildings along Ogden Drive. The maximum amount of construction noise that is experienced at Fountain Day School and adjacent residences would remain generally the same as the proposed project. Therefore, Alternative 3 would still result in potentially significant impacts in the category of construction noise. However, as with the proposed project, mitigation measures would reduce potentially significant construction-related noise impacts to below a level of significance.

Operational noise impacts would be similar to that of the proposed project but would change to a minor degree in some categories. However, the project's contribution to off-site traffic noise levels would be reduced under Alternative 3, since fewer vehicle trips would be generated (see Table 6-7). Exterior noise levels are expected to be the same or similar as those of the proposed project. While the hotel outdoor areas would be removed under Alternative 3, a number of outdoor areas (including a pool for the residential uses and outdoor dining) would still be part of the project and would have the potential to produce exterior noise from amplified sound systems and/or from conversations and people gathering outdoors. Additionally, loading spaces and a loading/receiving room would still be required for Alternative 3 since the project would include commercial uses and a restaurant. As such, operational noise impacts would remain potentially significant yet reduced to less-than-significant levels with implementation of mitigation. Given that overall traffic activities would be reduced under Alternative 3, the noise generated by the traffic would result in reduced noise impacts when compared to the proposed project.

Public Services

As discussed in Section 3.7, impacts to police protection, fire protection, and schools would be less than significant. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives.

Alternative 3 would result in 86 additional residential units relative to the proposed project, for a total of 156 residential units. However, the 86 hotel units that would be constructed for the proposed project would not be part of Alternative 3. As such, the on-site, overnight population at the project site would be generally the same under Alternative 3 as it would be for the proposed project. It is not anticipated that replacing hotel units with residential units for Alternative 3 would substantially change the demands of the project on fire protection or police protection. As with the proposed project, Alternative 3 would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police facilities, and impacts would remain less than significant for generally the same reasons described in Section 3.7 of this EIR.

Replacing hotel units with residential units would, however, increase the permanent population on the project site, thereby increasing the number of students that would be generated by the project. However, as demonstrated in Section 3.7 of this EIR, the public schools that serve the project site are not at enrollment capacity and have sufficient capacity to accommodate the increase in students that would be generated by Alternative 3. As such, while Alternative 3 would result in more demands upon select public services, the increased demand would not result in substantial adverse physical impacts associated with the provision of new or physically altered public facilities, and impacts would remain less than significant for generally the same reasons described in Section 3.7 of this EIR. For the reasons outlined above, Alternative 3 would result in comparable public services impacts to the proposed project.

Transportation

As discussed in Section 3.8, construction and operation of the proposed project would result in less-than- significant transportation impacts. All impacts would be less than significant, and no mitigation is required.

Alternative 3 would result in fewer daily vehicle trips and fewer peak hour trips when compared to the proposed project, as shown in Table 6-7. Overall, Alternative 3 would result in 251 fewer vehicle trips, with 9 fewer AM Peak period trips, 24 fewer Midday Peak period trips, and 14 fewer PM Peak period trips.

Table 6-7
Alternative 3 – Trip Generation Summary

Land Use	ITE Code	Intensity	Units	Daily Total	AM Peak			Midday Peak			PM Peak		
					Total	*In*	*Out*	*Total*	*In*	*Out*	*Total*	*In*	*Out*
Alternative 3 Trip Generation Rates													
Quality Restaurant [1]	931	-	-	83.84	0.73	80%	20%	4.47	80%	20%	7.80	67%	33%
Museum	580	-	-	6.60	0.28	86%	14%	0.66	71%	29%	0.18	16%	84%
Hotel	310	-	-	8.36	0.47	59%	41%	0.61	58%	42%	0.60	51%	49%
Multifamily (Mid-Rise)	221	-	-	5.44	0.36	26%	74%	0.32	27%	73%	0.44	61%	39%
Gym	492	-	-	28.82	1.31	51%	49%	1.40	46%	54%	3.45	57%	43%
Proposed Project Trip Generation Estimates													
Quality Restaurant	931	3.756	k.s.f	315	3	2	1	17	14	3	29	19	10
Art Gallery	580	1.381	k.s.f	9	1	1	0	1	1	0	1	0	1
Multifamily (Mid-Rise)	221	156	units	849	56	15	41	50	14	36	69	42	27
Proposed Project Subtotal				*1,173*	*60*	*18*	*42*	*68*	*29*	*39*	*99*	*61*	*38*
Internal Capture													
Restaurant (25%)				-79	-1	-1	0	-5	-4	-1	-8	-5	-3
External Project Trips				1,094	59	17	42	63	25	38	91	56	35
Former Use Trip Credit													
Gym	492	10.000	k.s.f	-288	-13	-7	-6	-14	-6	-8	-35	-20	-15
Multifamily (Mid-Rise)	221	7	units	-38	-3	-1	-2	-2	-1	-1	-3	-2	-1
Former Use Trip Credit				-326	-16	-8	-8	-16	-7	-9	-38	-22	-16
Alternative 3 Total				**768**	**43**	**9**	**34**	**47**	**18**	**29**	**53**	**34**	**19**
Proposed Project Total				**1,019**	**52**	**25**	**27**	**71**	**40**	**31**	**67**	**38**	**29**
Difference (Compared to Proposed Project)				**-251**	**-9**	**-16**	**7**	**-24**	**-22**	**-2**	**-14**	**-4**	**-10**

Trip generation rates based on ITE Trip Generation Manual, 10th Edition, Institute of Transportation Engineers, 2012, unless otherwise noted. Midday Peak rates from Peak Hour of Generator.
1 Quality Restaurant AM In/Out ratio from AM Peak Hour of Generator.

Access to the project site would continue to be available via Ogden Drive, Orange Grove Avenue and Santa Monica Boulevard (ingress only). As such, impacts on the vehicular circulation system, including intersections and roadway volumes, would be reduced under Alternative 3 when compared to the proposed project.

Impacts related to roadway hazards would be similar to those of the proposed project. The same driveways would be constructed as those that are planned for the proposed project, and they would be constructed in the same configuration. Additionally, Alternative 3 would not introduce any new conflicts with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities because the site would be developed and would continue to allow access to alternative forms of transportation and provide bicycle and pedestrian facilities. As such, impacts would remain less than significant and overall would be reduced when compared to the proposed project.

Utilities and Service Systems

As discussed in Section 3.9, construction and operation of the proposed project would result in less-than-significant impacts to water, wastewater, solid waste, energy, electricity, and telecommunications services.

Alternative 3 would result in no hotel units, 86 additional residential units, and reduced restaurant and commercial space relative to the proposed project. Residences typically use utilities at slightly different rates when compared with hotel uses (some impacts would be greater, while others would be reduced). However, due to the decrease in restaurant space and commercial space for Alternative 3, it is expected that overall utilities would remain relatively comparable to those of the proposed project. As with the proposed project, Alternative 3 would not require new water or wastewater facilities, would not require new or expanded water entitlements, and would not significantly impact landfills. Impacts would remain less than significant for generally the same reasons described in Section 3.9 of this EIR, and Alternative 3 would result in comparable utilities and service system impacts to the proposed project.

Energy

As discussed in Section 3.10, construction and operation of the proposed project would result in less-than-significant energy impacts. All impacts would be less than significant, and no mitigation is required.

Alternative 3 would result in no hotel units, 86 additional residential units, and reduced restaurant and commercial space relative to the proposed project. Energy consumption under Alternative 3 would likely remain comparable to the anticipated consumption under the proposed project given the comparable size of Alternative 3 relative to the project. As explained above under "Utilities and Service Systems," replacing hotel units with residential units may also increase energy demands under some categories. However, the overall decrease in daily vehicle trips during project

operation would result in fewer overall energy demands and impacts under Alternative 3. As such, energy impacts would remain less than significant, for generally the same reasons as described in Section 3.10 of this EIR, and Alternative 3 would result in comparable energy impacts to the proposed project.

6.2.4 Alternative 4 – Reduced Hotel

Alternative 4 would involve construction and operation of a mixed-use structure of approximately 211,669 sf with a maximum height of 71.5 feet, similar to the proposed project. The characteristics of the mixed-use building that would be developed under Alternative 4 are listed in Table 6-8. As shown in this table, the building would consist of a 45-room hotel, restaurant, 95 residential units, and an art gallery. The proposed building would include approximately 39,939 sf of hotel and commercial space with a total of 45 hotel rooms, 82,916 sf of residential space, 14,679 sf of common residential area and open space, and 74,223 sf of parking area. Of the 95 residential units (45 studios; 22 one-bedroom; 15 two-bedroom; 13 three-bedroom) 19 units would be low-income level affordable housing units. The building heights for Alternative 4 would range up to six stories above ground, up to 71.5 feet above grade in certain areas, with two subterranean levels of parking. Approximately 154 parking spaces would be available to serve the residential and commercial uses, with approximately 45 additional parking spaces available for public parking, totaling 199 parking spaces.

Access to the project site would be available from three separate driveways: one on Santa Monica Boulevard, one on Orange Grove Avenue, and one on Ogden Drive. The Reduced Hotel Alternative would be accessible for hotel guests and the public from Santa Monica Boulevard and North Orange Grove Avenue with separate vehicular ingress/egress for residents only along Ogden Drive. The entrance on Santa Monica Boulevard would provide point of ingress for commercial patrons arriving at the project site. Pedestrians could access the site via North Orange Grove Avenue, Santa Monica Boulevard, or Ogden Drive.

Construction of Alternative 4 would involve demolition of the existing 10,000-sf commercial building located on the existing 7811 Santa Monica Boulevard parcel, the parking lot adjacent to the commercial building, the parking lot located along Orange Grove Avenue, and the multifamily unit located on the parcel along Ogden Drive.

Table 6-8
Alternative 4 Components

Hotel and Commercial Area	
Square Footage	39,939 SF
Rooms	45 keys
Parking	23 stalls

Table 6-8
Alternative 4 Components

Amenities	Fitness area
	Pool
	Hotel restaurant
	Valet
	Laundry
	Housekeeping
	Outdoor common areas
Residential	
Square Footage	82,916 SF
Units	95 total units – 45 studios; 22 one-bedroom; 15 two-bedroom units; 13 three-bedroom units
Parking	123 stalls
Amenities	Affordable Housing: 19 low-income units; 9 studios; 4 one-bedroom; 3 two-bedroom; 3 three-bedroom
	Laundry, outdoor common areas
Art Gallery	
Square Footage	1,381 sf
Parking	1 stall
Common Area	
Square Footage	14,679 sf
Excess Public Parking	
Parking	45 stalls
Restaurants	
Square Footage	3,756 sf
Parking	7 stalls
Amenities	Restaurant and outdoor dining

Note: sf = square feet.

Ability to Meet Project Objectives

Alternative 4 would meet the project objectives, since it would establish a mixed-use building along Santa Monica Boulevard and on the east side of the City, with the same land use types and design features as the proposed project. However, this alternative would decrease the extent to which the project meets objectives pertaining to hospitality, including the objectives of providing a hospitality use in the vicinity of complementary studio and creative office uses; providing a full-service boutique hotel on the east side of the City; enhancing the east side's appeal as a visitor destination; and providing hospitality uses near alternative means of transportation. While Alternative 4 would still meet these objectives, it would result in 41 fewer hotel rooms when compared to the hotel that would be developed as part of the proposed project, thereby reducing the hotel size and decreasing the extent to which the hospitality objectives are achieved.

Alternative 4 would still meet objectives pertaining to economic benefits, but it would not achieve these objectives to the same degree as the proposed project. Reducing the size of the hotel would decrease the number of permanent jobs at the site and would reduce revenue from hotel occupancy taxes that would be generated during project operation. While Alternative 4 would still redevelop an underutilized site, it may not meet the objective of maximizing the site's economic value to the same degree as the proposed project, due to the decrease in hotel use. Conversely, Alternative 4 would meet objectives pertaining to housing to a greater degree than the proposed project since it would provide 25 more residential units than the proposed project, including 8 more low income units than the proposed project. As such, Alternative 4 would increase the degree to which the project would accommodate the need for additional residential housing in the City and in the County of Los Angeles, including affordable housing. It would also provide more housing uses near alternative means of transportation and would contribute more greatly to the residential development of mixed-use areas, when compared to the proposed project.

Comparison of the Environmental Effects to the Proposed Project

Alternative 4 would develop a mixed-use building on the project site in the same manner as the proposed project. The mixed-use building that would be developed under Alternative 4 would have similar land uses as the building that would be developed under the proposed project and would be similar in size, although the square footage would be slightly reduced relative to the proposed project. The building would have the same maximum height as the proposed project (71.5 feet) and would involve demolition of the same existing on-site structures as the proposed project. However, Alternative 4 would involve construction of 41 fewer hotel units. In lieu of the hotel space, 25 additional residential units would be constructed. The parking area would be the same size as that of the proposed project. The restaurant space and art gallery space would also be the same as the proposed project. The types of impacts for Alternative 4 would be similar to those of the proposed project. The following details each environmental issue area evaluated within this EIR.

Aesthetics

As discussed in Section 3.1, the proposed project would result in visual changes at the project site; however, the proposed project would be consistent with the neighborhood as characterized in City's General Plan. There are no known conflicts with applicable zoning or other regulations governing scenic quality. Additionally, in accordance with Section 21099 of the Public Resources Code, for qualified projects in a transit area zone, which is the case for the proposed project, aesthetic impacts cannot be considered significant, and therefore, the analysis makes no judgment of the significance of any possible impacts under CEQA.

As with the proposed project, this alternative would not result in significant impacts related to visual character/quality, light and glare, or shade/shadow. The appearance of the building

developed on the site would also be similar to that of the proposed project. While the building developed under Alternative 4 would decrease slightly in mass due to slight reduction in size, its height would remain the same relative to the proposed project (maximum of 71.5 feet). However, the change in building size would not result in an appreciable difference in the appearance of the structure when compared to the proposed project. Alternative 4 would be a transit-oriented project that falls within the definition of transit area projects identified in Section 21099 of the Public Resources Code. As explained in Section 3.1.2 of this EIR, for qualified projects in a transit area zone (such as the proposed project and this alternative) aesthetic impacts cannot be considered significant impacts on the environment pursuant to Section 21099(d)(1). Therefore, the aesthetics analyses for the proposed project and for this alternative make no judgment of the significance of any possible impacts under CEQA.

Air Quality

As discussed in Section 3.2, construction and operation of the proposed project would not result in any significant air quality impacts. All impacts would be less than significant, and no mitigation is required.

Construction activities for Alternative 4 would be similar in duration, intensity, and footprint relative to the proposed project. While the slight decrease in building size under Alternative 4 may slightly reduce the duration and the intensity of construction activities relative to the proposed project, the decrease would not be appreciable or necessarily noticeable. The footprint of ground disturbance and depth of excavation would be the same as those of the proposed project, and the types of the equipment expected to be used would be the same. As with the proposed project, the construction air quality effects of Alternative 4 would be less than significant.

During operation, the land uses on the project site would be similar to the proposed project, except that Alternative 4 would include 45 fewer hotel units and 25 more residential units. As explained in Section 3.2 of this EIR, operational air emissions are generated by mobile sources (vehicular traffic); area sources, such as the use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of fuels used for space and water heating and cooking appliances. Alternative 4 would represent a decrease in vehicular traffic (see Table 6-9). As such, Alternative 4 would result in decreased operational emissions, due to the decrease in vehicle trips. Given that air quality impacts associated with the proposed project would be less than significant, air quality impacts under Alternative 4 would also be less than significant and reduced overall when compared to the proposed project.

Cultural Resources

As discussed in Section 3.3, construction and operational impacts to archaeological and paleontological resources, as well as human remains, can be reduced to less-than-significant levels through implementation of mitigation. No impacts to historical resources would occur.

Impacts to cultural resources would be similar to those of the proposed project. The same existing structures that are proposed for demolition under the proposed project would be demolished under Alternative 4. As explained in Section 3.3, the on-site structures are not considered historical resources under CEQA. As such, impacts to historical, built-environment resources would remain less than significant under Alternative 4. The potential to uncover buried archaeological resources, paleontological resources, or human remains would also be the same, as the footprint of ground disturbance and the depth of excavation would be generally the same. As with the proposed project, impacts could be potentially significant in the event that unknown resources or remains were to be uncovered during excavation. The same mitigation measures provided for the proposed project would reduce these impacts to below a level of significance. With implementation of these measures, impacts to archaeological resources, paleontological resources, and human remains would be less than significant with mitigation incorporated and comparable to those of the proposed project.

Greenhouse Gas Emissions

As discussed in Section 3.4, construction and operation of the proposed project would result in less than significant GHG emission impacts. All impacts would be less than significant, and no mitigation is required.

GHG emissions generated during construction for Alternative 4 may slightly decrease relative to the proposed project due to the reduction in building size. During operation, the number of daily vehicle trips would decrease relative to the proposed project, thereby resulting in an overall decrease in operational emissions. The increase in residential units during operation may lead to increased energy use and associated emissions in some categories (such as solid waste and use of household appliances). The sustainability measures that were identified for the proposed project would still be implemented, as characterized for the proposed project in Section 2.4 of this EIR. Given that GHG emission impacts associated with the proposed project would be less than significant, GHG emission impacts under Alternative 4 would also be less than significant and reduced overall when compared to the proposed project.

Hazards and Hazardous Materials

As discussed in Section 3.5, the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials or through reasonably foreseeable upset or accident conditions. Additionally, the project would not emit

hazardous emissions or handle hazardous materials or substances within one-quarter mile of an existing or proposed school. All hazards impacts associated with the proposed project would be less than significant.

Impacts would be similar to those of the proposed project. The types of materials used during construction and operation would be generally the same, although slightly less volume would be required due to the slight reduction in building size relative to the proposed project. Impacts involving transport, use, and disposal of hazardous materials would remain less than significant. Similar types and quantities of hazardous materials would be used for Alternative 4 as for the proposed project, since the types of land uses would be generally the same (i.e., hotel, restaurant, and residential). As such, the potential for upset and accident conditions involving the release of hazardous materials to the environment would be similar to those of the proposed project. Impacts would remain less than significant. Because the project location and the types of hazardous materials that would be used for Alternative 4 would be generally the same as the proposed project, impacts involving the use or release of hazardous materials near schools would also remain less than significant and would be comparable to those of the proposed project.

Noise

As discussed in Section 3.6, construction and operational impacts of the proposed project would be potentially significant. However, with implementation of mitigation, all construction and operational noise impacts would be reduced to less than significant levels. Additionally, vibration impacts would be less than significant.

Construction noise for Alternative 4 would be similar to that of the proposed project. The area of construction would be the same and the types of construction equipment required would be the same. The slight decrease in building size under Alternative 4 may result in a slight reduction in the duration and intensity of construction. However, this slight change would not result in a noticeable or appreciable reduction in the daily construction noise that is experienced by surrounding receptors. As with the proposed project, construction for Alternative 4 would occur adjacent to Fountain Day School and residential sensitive receptors, including the multifamily residential buildings along Ogden Drive. The maximum construction noise levels that would be experienced at Fountain Day School and adjacent residences are expected to be generally the same as the levels identified for the proposed project. Therefore, Alternative 4 would still result in potentially significant impacts in the category of construction noise. However, as with the proposed project, mitigation measures would reduce potentially significant construction-related noise impacts to below a level of significance (see Section 3.6 of this EIR for details on these mitigation measures).

Operational noise impacts would be similar to that of the proposed project but would change to a minor degree in some categories. Because the traffic generation of the project would decrease, the

contribution to off-site traffic noise levels would decrease under Alternative 4. Exterior noise levels would be the same or similar. Because the size of the hotel would be reduced under Alternative 4, the noise levels from hotel outdoor areas may decrease relative to those identified for the proposed project. However, outdoor areas for the hotel, residential, and restaurant uses would still be part of the project and would have the potential to produce exterior noise from amplified sound systems and/or from conversations and people gathering outdoors. Additionally, operation of a loading dock would still be required, since the project would include restaurant and hotel uses. As such, operational noise impacts would remain potentially significant yet with implementation can be reduced to less than significant levels. Given that overall traffic activities would be reduced under Alternative 4, the noise generated by the traffic would result in reduced noise impacts when compared to the proposed project.

Public Services

As discussed in Section 3.7, impacts to police protection, fire protection and schools would be less than significant. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives.

Alternative 4 would result in additional residential units relative to the proposed project. However, the size of the hotel would be reduced. As such, the on-site, overnight population at the project site would be the same under Alternative 4 as it would be for the proposed project. It is not anticipated that replacing hotel units with residential units would substantially increase or decrease the demands of the project on fire protection or police protection. As with the proposed project, Alternative 4 would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire or police facilities, and impacts would remain less than significant for generally the same reasons described in Section 3.7 of this EIR.

Replacing hotel units with residential units would, however, increase the permanent population of the City, resulting in an increase in the number of students that would be generated by the project. However, as demonstrated in Section 3.7 of this EIR, the public schools that serve the project site are operating below capacity and would have sufficient capacity to accommodate the increase in students that would be generated by both the proposed project and Alternative 4. As such, while Alternative 4 would increase the number of students within the City, given available enrollment capacity, this increase not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. Impacts would remain less than significant for generally the same reasons described in Section 3.7 of this EIR. As such, Alternative 4 would result in comparable public services impacts to those of the proposed project.

Transportation

As discussed in Section 3.8, construction and operation of the proposed project would result in less-than-significant transportation impacts. All impacts would be less than significant, and no mitigation is required.

Alternative 4 would result in 41 fewer hotel units and 25 more residential units than the proposed project. The size of the art gallery, restaurant uses, and parking area would remain the same as the proposed project. As such, additional residents would travel to and from the site each day; fewer hotel guests and hotel employees would travel to and from the site each day; and the same number of restaurant customers and employees and art gallery visitors and employees would be expected to travel to and from the site each day. As shown in Table 6-9, Alternative 4 would result in 207 fewer overall vehicle trips relative to the proposed project. During the AM Peak period, 10 fewer trips would occur, during the Midday Peak period, 17 fewer trips would occur, and during the PM Peak period, 14 fewer trips would occur.

Impacts related to roadway hazards would be similar to those of the proposed project. The same driveways would be constructed as the proposed project, and they would be constructed in the same configuration. Additional vehicles may enter/exit from the Ogden Drive ingress/egress, which would be a residential-only driveway. Conversely, fewer vehicles would enter/exit from the Santa Monica Boulevard and Orange Grove Avenue driveways, since fewer hotel guests would be accessing the site. As such, a slight increase in vehicles entering/exiting the driveway along Ogden Drive and a slight decrease in vehicles entering/exiting the driveways along Santa Monica Boulevard and Orange Grove Avenue would not substantially alter vehicle queuing such that a significant safety hazard would occur. The sizes of the driveways and internal drive aisles would not change relative to the proposed project; as such, impacts would be less than significant.

Alternative 4 would not introduce any new conflicts with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities because the site would be developed and would continue to allow access to alternative forms of transportation and provide bicycle and pedestrian facilities. Given that transportation impacts associated with the proposed project would be less than significant and that overall Alternative 4 would result in fewer vehicle trips, transportation impacts associated with Alternative 4 are reduced when compared to the proposed project.

Table 6-9
Alternative 4 – Trip Generation Summary

Land Use	ITE Code	Intensity	Units	Daily Total	AM Peak			Midday Peak			PM Peak		
					Total	*In*	*Out*	*Total*	*In*	*Out*	*Total*	*In*	*Out*
Alternative 4 Trip Generation Rates													
Quality Restaurant [1]	931	-	-	83.84	0.73	80%	20%	4.47	80%	20%	7.80	67%	33%
Museum	580	-	-	6.60	0.28	86%	14%	0.66	71%	29%	0.18	16%	84%
Hotel	310	-	-	8.36	0.47	59%	41%	0.61	58%	42%	0.60	51%	49%
Multifamily (Mid-Rise)	221	-	-	5.44	0.36	26%	74%	0.32	27%	73%	0.44	61%	39%
Gym	492	-	-	28.82	1.31	51%	49%	1.40	46%	54%	3.45	57%	43%
Proposed Project Trip Generation Estimates													
Quality Restaurant	931	3.756	k.s.f	315	3	2	1	17	14	3	29	19	10
Art Gallery	580	1.381	k.s.f	9	1	1	0	1	1	0	1	0	1
Hotel	310	45	rooms	376	21	12	9	27	16	11	27	14	13
Multifamily (Mid-Rise)	221	95	units	517	34	9	25	30	8	22	42	26	16
Proposed Project Subtotal				*1,217*	*59*	*24*	*35*	*75*	*39*	*36*	*99*	*59*	*40*
Internal Capture													
Restaurant (25%)				-79	-1	-1	0	-5	-4	-1	-8	-5	-3
External Project Trips				1,138	58	23	35	70	35	35	91	54	37
Former Use Trip Credit													
Gym	492	10.000	k.s.f	-288	-13	-7	-6	-14	-6	-8	-35	-20	-15
Multifamily (Mid-Rise)	221	7	units	-38	-3	-1	-2	-2	-1	-1	-3	-2	-1
Former Use Trip Credit				-326	-16	-8	-8	-16	-7	-9	-38	-22	-16
Alternative 4 Total				**812**	**42**	**15**	**27**	**54**	**28**	**26**	**53**	**32**	**21**
Proposed Project Total				**1,019**	**52**	**25**	**27**	**71**	**40**	**31**	**67**	**38**	**29**
Difference (Compared to Proposed Project)				***-207***	***-10***	***-10***	***0***	***-17***	***-12***	***-5***	***-14***	***-6***	***-8***

Trip generation rates based on ITE Trip Generation Manual, 10th Edition, Institute of Transportation Engineers, 2012, unless otherwise noted. Midday Peak rates from Peak Hour of Generator.

[1] Quality Restaurant AM In/Out ratio from AM Peak Hour of Generator.

Utilities and Service Systems

As discussed in Section 3.9, construction and operation of the proposed project would result in less than significant impacts to water, wastewater, solid waste, energy, electricity, and telecommunications services.

Alternative 4 would result in fewer hotel units and additional residential units. Sewage generation, solid waste production, and water use may change slightly, since residences use utilities at slightly different rates when compared with hotel uses. However, replacing hotel units with residential units would not result in an appreciable difference in the project's demand on utilities, such that new or different impacts not identified for the proposed project would result from Alternative 4. As with the proposed project, Alternative 4 would not exceed wastewater treatment requirements or exceed the conveyance or treatment capacity of existing sewage systems or landfills. Impacts would remain less than significant for generally the same reasons described in Section 3.9 of this EIR, and Alternative 4 would result in comparable impacts to the proposed project.

Energy

As discussed in Section 3.10, construction and operation of the proposed project would result in less-than-significant energy impacts. All impacts would be less than significant, and no mitigation is required.

Energy consumption under Alternative 4 would be generally the same as that identified for the proposed project. While the size of the building would decrease slightly under Alternative 4, this would not result in an appreciable difference in the building's energy consumption. Under Alternative 4, half of the hotel units that are planned to be constructed under the proposed project would be residential under Alternative 4. The other proposed land uses for Alternative 4 would be generally the same as those that would be developed under the proposed project. Impacts would be similar to those of the proposed project and would therefore be less than significant, as identified in Section 3.10 of this EIR, and Alternative 4 would result in comparable impacts to the proposed project.

6.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

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

A comparative summary of the environmental impacts associated with each alternative is provided in Table 6-10. As shown, Alternative 1 (the No Project Alternative) would be the

environmentally superior alternative, as it would result in no new environmental impacts and would eliminate the potentially significant impacts related to air quality, cultural resources, and noise. Among the remaining alternatives, Alternatives 2, 3, and 4 would reduce impacts in most categories when compared to the proposed project primarily driven by the reduced size of the project built under each alternative. Overall, Alternative 2 would result in 84 fewer vehicle trips when compared to the proposed project, Alternative 3 would result in 251 fewer vehicle trips when compared to the proposed project, and Alternative 4 would result in 207 fewer vehicle trips when compared to the proposed project.

While the proposed project does not create any significant and unavoidable impacts, Alternative 3 would result in the fewest impacts among the alternatives (aside from the No Project Alternative). The primarily residential building that would be developed under Alternative 3 would be smaller in size when compared to the building that would be developed under the proposed project and because Alternative 3 would generate fewer vehicle trips than the proposed project, fewer air quality, GHG emission, and noise impacts would occur. For these reasons, Alternative 3 would be the environmentally superior alternative.

Table 6-10
Comparison of Impacts to the Proposed Project

Impact Area	Proposed Project	Alternative 1 No Project	Alternative 2 Reduced Project	Alternative 3 No Hotel	Alternative 4 Reduced Hotel
Aesthetics	N/A	N/A	N/A	N/A	N/A
Air Quality	LTS	▼	▼	▼	▼
Cultural Resources	LTSM	▼	=	=	=
Greenhouse Gas Emissions	LTS	▼	▼	▼	▼
Hazards & Hazardous Materials	LTS	=	▼	=	=
Noise	LTSM	▼	=	▼	▼
Public Services	LTS	▼	▼	=	=
Transportation	LTS	▼	▼	▼	▼
Utilities and Service Systems	LTS	▼	▼	=	=
Energy	LTS	▼	▼	=	=

Notes: N/A = Not Applicable; LTSM = Less than Significant with Mitigation; LTS = Less than Significant
= Comparable Impacts
▼ Reduced Impacts