

V. Alternatives

V. Alternatives

1. Introduction

The identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process under CEQA. Public Resources Code (PRC) Section 21002 states, in part, that the environmental review process is intended to assist public agencies in systematically identifying both the significant effects of proposed projects and the feasible alternatives or feasible mitigation measures which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects. In addition, PRC Section 21002.1(a) states, in part, that the purpose of an environmental impact report is to identify the significant effects on the environment of a project, identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

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

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

The CEQA Guidelines indicate that the selection of project alternatives should be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. The CEQA Guidelines further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [...], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [...].

Beyond these factors, CEQA Guidelines Section 15126.6(e) requires the analysis of a “no project” alternative and CEQA Guidelines Section 15126.6(f)(2) requires an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.

2. Overview of Selected Alternatives

As indicated above, the intent of the alternatives analysis is to reduce the significant impacts of a project. Based on the analysis provided in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would potentially result in significant Project-level impacts that cannot be feasibly mitigated with respect to on-site noise during construction and on-site vibration during construction (pursuant to the threshold for human annoyance). In addition, as evaluated in Section IV.F, Noise, of this Draft EIR, cumulative impacts with respect to on- and off-site construction noise would also be significant and unavoidable.

Accordingly, based on the significant environmental impacts of the Project, the objectives established for the Project (refer to Section II, Project Description, of this Draft EIR), and the feasibility of the potential alternatives, the alternatives to the Project listed below were selected for evaluation. The rationale for selecting the range of alternatives was based on the likelihood of the alternatives being able to potentially avoid or substantially lessen one or more of the potentially significant impacts and the intent to develop a high-quality mixed-use development that provides new multi-family housing and commercial uses that serve the community and promote walkability.

- Alternative 1: No Project/No Build Alternative
- Alternative 2: Zoning Compliant All Commercial Alternative
- Alternative 3: Zoning Compliant All Hotel Alternative
- Alternative 4: Reduced Density (25 Percent) Mixed-Use Alternative

Each of these alternatives is described in the sections that follow. In addition, CEQA Guidelines Section 15126.6(c) requires that an EIR identify any alternatives that were considered for analysis but rejected as infeasible, and such potential alternatives are also discussed below.

3. Alternatives Considered and Rejected as Infeasible

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

- **Alternative Project Site:** The Applicant already owns the Project Site, and its location is conducive to the development of a mixed-use project. The Project Site is located on a section of Sunset Boulevard characterized by medium to high-density, low- and high-rise commercial and multi-family structures. These uses make the Project Site particularly suitable for development of a mixed-use development that provides new multi-family housing and neighborhood-serving commercial uses that serve the community and promote walkability. The Project Site is also well-served by transit. Furthermore, the Project Applicant cannot reasonably acquire, control, or access an alternative site in a timely fashion that would result in implementation of a project with similar uses and square footage. Given its urban location, if an alternative site in the Hollywood area that could accommodate the Project could be found, it would be expected that the significant and unavoidable impacts associated with construction noise/vibration would also occur, similar to the Project on the Project Site. Additionally, considering the mix of uses in the Hollywood area where sensitive uses may be located closer, development of the Project at an alternative site could potentially produce other environmental impacts that would otherwise not occur at the current Project Site and result in greater environmental impacts when compared with the Project. Therefore, an alternative site is not considered feasible as the Applicant does not own another suitable site that would achieve the underlying purpose and objectives of the Project, and an alternative site would not likely avoid the Project's significant impacts. Thus, this alternative was rejected from further consideration.
- **Alternative to eliminate significant noise and vibration impacts:** As discussed in Section IV.F, Noise, of this Draft EIR, the Project would result significant Project-level and cumulative impacts that cannot be feasibly mitigated with respect to on-site noise during construction and on-site vibration during

construction (pursuant to the threshold for human annoyance). In addition, as evaluated in Section IV.F, Noise, of this Draft EIR, cumulative impacts with respect to off-site construction noise would also be significant and unavoidable. The following approaches were considered to substantially reduce or avoid these impacts:

- Approach (a)—Above-grade Parking: An approach where all parking is provided above rather than below grade, thus avoiding much of the excavation and hauling activity required under the Project was reviewed and rejected as infeasible for the following reasons:
 - Although the on-site construction activities would be reduced during site grading due to less excavation, the on-site construction noise levels during the grading phase would be similar to the Project, as the number of and type of construction mix would be similar on a peak day, which is used for the evaluation of impacts. In addition, noise levels during the other construction phases, including site demolition, mat foundation, building construction, finishing, and paving would be similar to the Project. As such, noise impacts from on-site construction activities would be significant, similar to the Project.
 - Off-site construction noise levels are dependent on truck volumes, i.e., a reduction of 50 percent in truck volume, would reduce the noise level by 3 dBA (just perceptible). This above-grade parking approach would reduce the total number of haul truck trips due to a lower amount of excavation required. However, grading would still be required and the hauling activities on a peak day would likely be similar to the Project. In addition, in order to reduce noise by 3 dBA on a peak hauling day, the number of daily haul truck trips would need to be reduced by 50 percent.
 - Construction equipment utilized under this approach would be similar to the Project (e.g., drill rig and large bulldozer), which would generate similar vibration levels. Therefore, on-site construction vibration impacts (human annoyance) would be significant similar to the Project, as the vibration impact analysis is based on the peak daily vibration level generated by individual construction equipment. In addition, off-site cumulative construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant.
 - Construction noise levels can be reduced with a smaller number of on-site construction equipment pieces and with a buffer zone between the sensitive receptors and the construction equipment. However, due to the close proximity of the sensitive receptors (i.e., across Serrano Avenue from the Project Site) and existing development that would require demolition and does not have the space to create a meaningful buffer

zone, it would not be practical to mitigate the on-site construction noise impacts of the Project.

- Approach (b)—Extended Construction Duration: An approach that extends the construction period, thus reducing the amount of daily construction activity that would occur under the Project was reviewed and rejected as infeasible for the following reasons:
 - Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). It is anticipated the number of on-site construction equipment and off-site construction trips would be reduced under this approach. Typically, a reduction of 50 percent in the number of construction equipment or construction traffic (haul and delivery trucks) trips would be required to reduce the construction-related noise levels by 3 dBA (just perceptible).¹ For example, a 50-percent reduction in the number of construction trucks during the site grading phase, from 38 to 19 truck trips per hour, would reduce the truck noise along the anticipated haul routes by approximately 3 dBA as compared to the Project. However, when accounting for the ambient noise level (i.e., the Project plus ambient noise levels due to off-site construction trucks) the actual noise levels resulting from a 50-percent reduction in construction trucks would only be reduced by 1.3 dBA along Western Avenue and Sunset Boulevard, and 1.8 dBA along Lexington Avenue. With respect to on-site construction, reducing the on-site construction equipment during the site demolition phase from 7 pieces to 3 pieces of equipment (57-percent reduction) would reduce the construction noise at the off-site receptors by 0.9 dBA L_{eq} at receptor location R1, 1.5 dBA at receptor location R3, 1.6 dBA at receptor locations R2 and R5, and 1.7 dBA L_{eq} at receptor location R4 (as compared to the Project). The estimated construction noise levels with a 57-percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 3.1 dBA L_{eq} at receptor location R5, 5.2 dBA at receptor location R3, 8.6 dBA L_{eq} at receptor location R2, and 17.6 dBA L_{eq} at receptor location R1 during the site demolition phase. Furthermore, due to the proximity of the off-site noise sensitive receptors (e.g., receptor location R1 directly across the street (Serrano Avenue) from the Project Site), it would not be practical to reduce the construction noise levels to below the significance threshold as a single piece of

¹ *The reference to 3 dBA here and in other parts of the discussion of the noise options considered does not have to do with how much construction noise levels need to be reduced to avoid significant impacts. Rather, it has to do with: (1) the minimum reduction required to be audible to the human ear; and (2) the fact that a lowering of the number of construction pieces and volume of construction traffic by 50 percent is required to result in an audible reduction in on- and off-site construction noise, respectively. Another words, reducing peak day construction activities by 50 percent would result in a barely audible reduction in construction noise.*

equipment would result in noise levels above the significance threshold. Therefore, the construction noise levels under this approach would be less than the Project (depending on the amount of the reduction) but would still exceed the significance threshold. In addition, this approach would be inefficient and would increase the number of days that sensitive receptors would be impacted by construction activities. As such, the on-site construction noise impacts under this approach be less but would remain significant.

- Construction noise levels can be reduced with a smaller number of on-site construction equipment pieces and with a buffer zone between the sensitive receptors and the construction equipment. However, due to the proximity of the sensitive receptors (i.e., directly across the street from the Project Site), existing development that would require demolition and grading up to the property line, and insufficient distance to create a meaningful buffer zone, it would not be practical to mitigate the on-site construction noise impacts of the Project.
- The on-site construction vibration impacts (human annoyance) would be significant, similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment, and the approach would utilize similar construction equipment (e.g., drill rig and large bulldozer).
- Approach (c)—Central Location of Development: An approach where the proposed development is moved closer to the center of the Project Site, thus pulling back the proposed development and associated construction activities from the off-site sensitive receptors, was reviewed and rejected as infeasible for the following reasons:
 - Construction noise levels can be reduced by providing an additional buffer zone between the receptor and the construction equipment. Noise levels from construction equipment would attenuate approximately 6 dBA per doubling of distance from the noise source (construction equipment) to the receptor over acoustically “hard” sites (e.g., asphalt and concrete surfaces) and 7.5 dBA per doubling of distance from the noise source to the receptor over acoustically “soft” sites (e.g., soft dirt, grass or scattered bushes and trees). The construction noise levels associated with the building phases for the proposed development placed closer to the center of the site would be lower than the Project. However, the noise level reduction, depending on the setback from the property line, would be limited due to the size of the Project Site, and due to existing on-site improvements that would still require demolition and grading up to the property line. In addition, noise levels during the site demolition, site grading, and paving would be similar to the Project, as construction activities for these phases would be up to the property line, similar to the

Project. As such, the on-site construction noise impacts under this approach would remain significant similar to the Project.

- Approach (d)—Reduced Development: An approach that reduces the amount of development that would occur under the Project to the extent that the significant construction-related noise and vibration impacts of the Project would be avoided or substantially reduced was also considered and rejected as infeasible:
 - As discussed above, construction noise levels can be reduced with a smaller number of on-site construction equipment pieces and with a buffer zone between the sensitive receptors and the construction equipment. However, due to the close proximity of the sensitive receptors (i.e., directly across the street from the Project Site) and existing development that would require demolition and grading up to the property line and does not have the space to create a meaningful buffer zone, it would not be practical to mitigate the on-site construction noise impacts of the Project.
 - The on-site construction vibration impacts (human annoyance) would be significant similar to the Project, as the vibration impact analysis is based on the peak vibration level generated by individual construction equipment pieces that would still be required near the perimeter of the Project Site.

As indicated above, none of the above approaches would substantially reduce or avoid the significant construction-related noise and vibration (human annoyance) impacts of the Project. Furthermore, Approaches (a) through (d) would not achieve the Project’s underlying purpose and objectives to the same extent as the Project. Specifically, these approaches would provide fewer residential units and jobs near transit.² Approach (a) would be inconsistent with City guidance that generally discourages above grade parking;³ Approach (b) would extend the construction period, meaning impacts would affect sensitive receptors for a longer period of time, making this approach infeasible; and Approach (c) would not enhance the pedestrian realm near the Project Site to the same extent as the Project and would meet the underlying objective to a lesser extent than the Project. For example, with Approach (c) the proposed uses would be far from adjacent sidewalks and thus would not provide active ground floor uses or pedestrian-friendly building design elements adjacent to the sidewalks and public right of way. Therefore, an alternative that includes one or more of these approaches has been rejected from further consideration in this Draft EIR.

² *The underlying purpose of the Project referred to here is to develop a high-quality mixed-use development that provides new multi-family housing and retail and restaurant uses that serve the community and promote walkability.*

³ *City of Los Angeles, Department of City Planning, Updated Advisory Notice Relative to Above-Grade Parking, October 24, 2019.*

4. Alternatives Analysis Format

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II, Project Description, of this Draft EIR, would be substantially attained by the alternative.⁴ The evaluation of each of the alternatives follows the process described below:

- a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section IV, Environmental Impact Analysis, of this Draft EIR assuming that the alternative would implement the same project design features and mitigation measures identified in Section IV, Environmental Impact Analysis, of this Draft EIR.
- b. Post-mitigation significant and non-significant environmental impacts of the alternative and the Project are compared for each environmental issue area as follows:
 - Less: Where the net impact of the alternative would be clearly less adverse or more beneficial than the impact of the Project, the comparative impact is said to be “less.”
 - Greater: Where the net impact of the alternative would clearly be more adverse or less beneficial than the Project, the comparative impact is said to be “greater.”
 - Similar: Where the impact of the alternative and Project would be roughly equivalent, the comparative impact is said to be “similar.”
- c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are feasibly and substantially attained by the alternative.

A summary matrix that compares the impacts associated with the Project with the impacts of each of the analyzed alternatives is provided below in Table V-1 on page V-9.

⁴ *State of California, CEQA Guidelines Section 15126.6 (c).*

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Zoning Compliant All Hotel Alternative⁵	Alternative 4: Reduced Density (25 Percent) Mixed- Use Alternative
A. AIR QUALITY					
<i>Construction</i>					
<i>Regional and Localized Emissions</i>	Less Than Significant with Mitigation	Less (No Impact)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)	Similar (Less Than Significant with Mitigation)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>					
<i>Regional and Localized Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Toxic Air Contaminants</i>	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
B. CULTURAL RESOURCES					
<i>Historic Resources</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

⁵ *Alternative 3 does not fit the definition of an employment center project pursuant to PRC Section 21099. As discussed below, Alternative 3 would result in less-than-significant aesthetic impacts. Because the Project does not have aesthetic impacts as a matter of law pursuant to PRC Section 21099, an impact comparison is not appropriate; however, the building height of Alternative 3 is 30 feet lower than the proposed Project height.*

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Zoning Compliant All Hotel Alternative⁵	Alternative 4: Reduced Density (25 Percent) Mixed- Use Alternative
<i>Archaeological Resources</i>	Less Than Significant With Mitigation	Less (No Impact)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)	Less (Less Than Significant With Mitigation)
C. ENERGY					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than significant)	Less (Less Than Significant)	Less (Less Than Significant)
D. GREENHOUSE GAS EMISSIONS					
<i>Greenhouse Gas Emissions</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
E. LAND USE					
<i>Physical Division of a Community</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Conflict with Land Use Plans</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Zoning Compliant All Hotel Alternative ⁵	Alternative 4: Reduced Density (25 Percent) Mixed- Use Alternative
F. NOISE					
<i>Construction</i>					
<i>On-Site Noise</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Noise</i>	Less Than Significant ⁶	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>On-Site Vibration (Human Annoyance)</i>	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
<i>Off-Site Vibration (Human Annoyance)</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>					
<i>On-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Off-Site Noise</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

⁶ Project-level impacts would be less than significant without mitigation, but cumulative impacts would be significant and unavoidable. This is also true of Alternatives 2, 3, and 4.

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Zoning Compliant All Hotel Alternative⁵	Alternative 4: Reduced Density (25 Percent) Mixed- Use Alternative
G. POPULATION AND HOUSING					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
H. PUBLIC SERVICES					
<i>Fire Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Police Protection</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Zoning Compliant All Hotel Alternative⁵	Alternative 4: Reduced Density (25 Percent) Mixed- Use Alternative
<i>Schools</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Libraries</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Parks and Recreation</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)	Similar (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
I. TRANSPORTATION					
<i>Conflict with Plans</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Zoning Compliant All Hotel Alternative⁵	Alternative 4: Reduced Density (25 Percent) Mixed- Use Alternative
<i>Vehicle Miles Traveled</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Hazardous Geometric Design Features</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Emergency Access</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
J. TRIBAL CULTURAL RESOURCES					
<i>Tribal Cultural Resources</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
K. UTILITIES AND SERVICE SYSTEMS					
<i>Water Supply and Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Wastewater</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)

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

Impact Area	Project	Alternative 1: No Project/No Build Alternative	Alternative 2: Zoning Compliant All Commercial Alternative	Alternative 3: Zoning Compliant All Hotel Alternative⁵	Alternative 4: Reduced Density (25 Percent) Mixed- Use Alternative
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Energy Infrastructure</i>					
<i>Construction</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<i>Operation</i>	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
<hr/> <i>Source: Eyestone Environmental, 2021.</i>					

V. Alternatives

A. Alternative 1: No Project/No Build Alternative

1. Description of the Alternative

In accordance with the CEQA Guidelines, the No Project Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states in part that, “in certain instances, the No Project Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the Project would not be approved and no new development would occur within the Project Site. Thus, the physical conditions of the Project Site would generally remain as they are today. The Project Site would continue to be occupied by a one-story grocery store and one-story fast-food restaurant and their associated parking areas. No new construction would occur.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not alter the existing commercial uses on-site or require any construction activities on the Project Site. Therefore, Alternative 1 would not result in any construction emissions associated with construction worker and construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment, and construction-related regional and localized air quality impacts would not occur. Therefore, no construction-related air quality impacts associated with regional and localized emissions would occur under Alternative 1, and impacts would be less than the impacts of the Project, which are less than significant with mitigation.

(b) Toxic Air Contaminants

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

(2) Operation

(a) Regional and Localized Air Quality Impacts

The No Project/No Build Alternative would not result in new development or increased operations that could generate additional operational emissions related to vehicular traffic or the consumption of electricity and natural gas beyond what is currently generated by the existing commercial uses on the Project Site. Therefore, no operational air quality impacts associated with regional and localized emissions would occur under Alternative 1. Thus, such operational impacts associated with regional and localized emissions under Alternative 1 would be less when compared to the less-than-significant impacts of the Project.

(b) Toxic Air Contaminants

As set forth in Section IV.B, Air Quality, of this Draft EIR, the Project would result in some TAC emissions, primarily from mobile source emissions. Since the No Project/No Build Alternative would not result in new development or increase the intensity of the existing uses on the Project Site, no new increase in mobile source emissions would occur. No operational impacts associated with TACs would occur under the No Project/No Build Alternative, and such impacts would be less when compared to the less-than-significant impacts of Project.

b. Cultural Resources

(1) Historical Resources

No historical resources have been identified on the Project Site. In addition, demolition, grading, or other earthwork activities that could potentially affect adjacent or nearby historical resources would not occur under the No Project/No Build Alternative. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be less when compared to the Project, which would be less than significant.

(2) Archaeological Resources

No grading or earthwork activities would occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface archaeological resources. As such, no impacts to archaeological resources would occur, and impacts would be less when compared to the Project, which would be less than significant with mitigation.

c. Energy

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the energy demand on the Project Site. No impacts related to energy would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

The No Project/No Build Alternative would not develop new uses on the Project Site. Therefore, no new greenhouse gas (GHG) emissions would be generated under Alternative 1 and new impacts associated with global climate change would not occur. As such, impacts associated with GHG emissions under the No Project/No Build would be less when compared to the less-than-significant impacts of the Project.

e. Land Use

(1) Physical Division of a Community

Since the No Project/No Build Alternative would not develop new land uses on the Project Site, the existing on-site and/or off-site land uses would not be altered, and existing land use relationships would remain. Therefore, no impacts related to physical division of a community would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Conflict With Land Use Plans

Under the No Project/No Build Alternative, there would be no changes to the physical or operational characteristics of the existing on-site commercial uses and adjacent paved surface areas. No land use approvals or permits would be required. Therefore, Alternative 1 would not result in any inconsistencies with existing land use plans and policies that govern the Project Site, including those that were adopted for the purpose of avoiding or mitigating an environmental effect. No impacts associated with conflicts with

land use regulations and plans would occur, and impacts would be less than the less-than-significant impacts of the Project.

f. Noise

(1) Construction

Construction activities would not occur on the Project Site under the No Project/No Build Alternative. Therefore, no construction-related noise or vibration would be generated on-site or off-site. As such, Alternative 1 would eliminate the Project's significant and unavoidable on-site noise impacts during construction and on-site vibration impacts during construction (pursuant to the threshold for human annoyance). The No Project/No Build Alternative would also avoid the Project's cumulative on-site noise impacts and noise impacts from off-site haul trucks during construction. Therefore, no impacts associated with construction noise and vibration would occur under Alternative 1, and such impacts would be less when compared to those of the Project, which are significant and unavoidable.

(2) Operation

The No Project/No Build Alternative would not develop new uses on the Project Site, and no changes to existing site operations would occur. Therefore, no new stationary or mobile noise sources would be introduced to the Project Site or the Project Site vicinity. As such, no change in the ambient noise environment associated with on-site or off-site operational noise would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

g. Population and Housing

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no potential to introduce a new unplanned residential population on the Project Site. However, unlike the Project, Alternative 1 would not advance local and regional planning objectives that promote the development of new housing to meet housing demand. Specifically, the Project Site would remain a low-rise commercial center with surface parking areas. No impacts with respect to population and housing would occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

h. Public Services

(1) Fire Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Fire Department (LAFD) stations that would serve the Project Site such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to fire protection would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

No construction or changes to existing land uses and operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the level of activity on the Project Site or increase the service population for the Los Angeles Police Department (LAPD) station that would serve the Project Site such that the addition of a new police station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to police protection services would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Schools

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, there would be no potential to increase the population of school-aged children in the attendance boundaries of the schools within the Los Angeles Unified School District (LAUSD) that serve the Project Site such that the addition of new school facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. Accordingly, no impacts to school services would occur under Alternative 1, and impacts would be less than the Project's less-than-significant impact on school services.

(4) Libraries

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, Alternative 1 would not increase the library service population such that the addition of new library facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to library services would occur under the No Project/No Build Alternative, and impacts would be less than the Project's less-than-significant impact on library services.

(5) Parks and Recreation

The No Project/No Build Alternative would not construct new development or increase operations on-site. Therefore, Alternative 1 would not generate additional demand for parks and recreational facilities in the Project Site vicinity such that the addition of new parks and recreational facilities or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service. No impacts to parks and recreational facilities would occur under the No Project/No Build Alternative, and impacts would be less than the Project's less-than-significant impact on parks and recreational facilities.

i. Transportation

Since the No Project/No Build Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips or alter existing access or circulation within the Project Site during operation. Therefore, no impacts would occur with respect to operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; and emergency access. Therefore, impacts under the No Project/No Build Alternative would be less when compared to the Project, which would be less than significant.

j. Tribal Cultural Resources

Grading and other earthwork activities would not occur under the No Project/No Build Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface tribal cultural resources. As such, no impacts to tribal cultural resources would occur, and impacts would be less when compared to those of the Project would be less than significant.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate a short-term demand for water during construction, and construction-related impacts to water supply and infrastructure would not occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the long-term water demand on the Project Site. No operational impacts to water supply and water infrastructure would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not generate wastewater during construction and construction-related impacts to wastewater conveyance and treatment infrastructure would not occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the wastewater flow on the Project Site. No operational impacts related to wastewater conveyance or treatment would occur under the No Project/No Build Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Construction activities would not occur under the No Project/No Build Alternative. Therefore, Alternative 1 would not increase the energy demand on the Project Site during construction and no impact to the associated energy infrastructure would occur. As such, impacts under the No Project/No Build Alternative would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

The No Project/No Build Alternative would not alter the existing land uses or site operations on the Project Site. Therefore, Alternative 1 would not increase the energy demand on the Project Site and no impact to the associated energy infrastructure would occur. Impacts would be less when compared to the less-than-significant impacts of the Project.

3. Comparison of Impacts

The No Project/No Build Alternative would avoid the Project's significant and unavoidable on-site construction noise impacts and on-site construction vibration (pursuant to the threshold for human annoyance) impacts. Furthermore, the No Project/No Build Alternative would avoid the Project's cumulative on-site and off-site construction noise impacts. Impacts associated with the remaining environmental issues would be less than those of the Project.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the existing commercial uses and their associated parking areas would continue to operate on the Project Site and no new development would occur. As such, Alternative 1 would not meet the underlying purpose of the Project or any of the Project objectives. Specifically, Alternative 1 would not meet the following basic objectives of the Project:

- Provide a mix of uses that maximizes building density at a location served by public transit and locate residential uses in areas that reduce automobile dependency in a transit priority area;
- Improve the visual character of the Project area by redeveloping a project site currently improved with one-story commercial uses and associated surface parking with a new, mixed-use project that utilizes and conforms to the maximum Floor Area Ratio permitted by the Vermont/Western Station Neighborhood Area Specific Plan;
- Provide needed housing near public transit by constructing high density residential dwelling units to serve a range of tenants, and develop new housing stock at an infill location close to commercial and office uses;
- Promote fiscal and community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through new housing;
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit;
- To meet the objectives of the Vermont/Western Station Neighborhood Area Specific Plan to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses

such as neighborhood-serving commercial uses and publicly accessible plazas and paseos; and

- To promote local and regional mobility objectives by concentrating higher-density housing along Sunset Boulevard, a commercial corridor, and providing a mix of residential and neighborhood-serving commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, and supported by recreational amenities and commercial services.

Overall, the No Project/No Build Alternative would not meet the Project's underlying purpose to develop a high-quality mixed-use development that provides new multi-family housing and retail and restaurant uses that serve the community and promote walkability.

V. Alternatives

B. Alternative 2: Zoning Compliant All Commercial Alternative

1. Description of the Alternative

Under this Alternative, the Project Site would be developed with all commercial uses in accordance with the existing C2-1 (Commercial, Height District 1) zoning for the Project Site. Height District 1 within the C2 zone normally imposes no height limitation and a maximum FAR of 1.5:1. However, Section 8.B.2 of the Specific Plan permits a maximum building height of 35 feet and a maximum FAR of 1.5:1 for projects comprised exclusively of commercial uses. Alternative 2 would specifically develop approximately 422,834 square feet of commercial uses in four buildings centered around north-south and east-west paseos, which is less than the 882,250 square feet proposed by the Project.⁷ The commercial uses would consist of 322,834 square feet of office space, 50,000 square feet of market space, 35,000 square feet of retail space, and 15,000 square feet of restaurant space. Due to the reduced size, construction duration would be shorter than the Project. Unlike the Project, no residential uses are proposed. The four buildings would be four stories and approximately 65 feet in height. The Zoning Compliant All Commercial Alternative would not be required to include open space, but would include the same pedestrian paseos and plaza as the Project that would include paving materials, raised planters, outdoor dining areas, and landscape elements that would enhance the Sunset Boulevard streetscape adjacent to the Project Site. A total of 764 vehicle parking spaces would be provided in two subterranean parking levels and in one partial at-grade parking level. The subterranean parking levels would have a smaller footprint than the Project and would, therefore, require less area of excavation. Alternative 2 would provide 212 bicycle parking spaces with short-term spaces located along Sunset Boulevard and Western Avenue, and long-term spaces within the parking levels. Vehicular access for Alternative 2 would be provided via two driveways on Western Avenue, one driveway on Sunset Boulevard, and one driveway on Serrano Avenue. Pedestrian access would be from Sunset Boulevard, Western Avenue, and Serrano Avenue. Alternative 2 would require the same entitlements as the Project, as well as a Specific Plan amendment to permit the proposed building height.

⁷ While the proposed building would appear as four separate structures, these structures collectively comprise one building per the City's Building Code due to the unifying subterranean parking structure.

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 2, it is anticipated that construction activities would be reduced in comparison to the Project due to the overall reduction in development and excavation. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the Project's impacts and the same mitigation measures would be implemented. Therefore, impacts would be similar to the Project, which are less-than-significant with mitigation.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 2 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 2 would be less than those of the Project due to the overall reduction in development and excavation. As discussed above, construction activities under this Alternative would be similar to the Project on a daily basis. However, TAC impacts are evaluated on a long-term basis. As the overall amount of development under this Alternative would be less than the Project, the overall duration of construction activity would also be reduced. As a result, the duration of TAC exposure to nearby sensitive receptors under this Alternative would be less than the Project. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. Using the Los Angeles Department of Transportation's (LADOT) VMT Calculator, development of Alternative 2 would result in 1,029 net daily trips compared to 2,373 with the Project.⁸ As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, impacts associated with regional operational emissions would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 2 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 2 would also be less than significant. Such impacts would be less than the less-than-significant impacts of the Project due to the overall decrease in building area.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. The commercial uses under this Alternative are not expected to operate as a warehousing or distribution facility which would tend to generate more heavy duty diesel truck trips. While the commercial uses under this Alternative would generate more delivery truck trips in comparison to residential uses in the Project, the majority of delivery trucks are expected to be gasoline powered light and medium duty trucks (e.g. FedEx, UPS, post office). In addition, the number of loading docks under this Alternative would be minimal, reducing the number of heavy duty trucks that can visit the site on a daily basis. Emissions from diesel powered trucks however, would be similar or slightly greater than the less-than-significant impacts of the Project.

The commercial uses associated with Alternative 2 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically

⁸ Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR.

hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 2. Similar to the Project, Alternative 2 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Under Alternative 2, operational TAC emissions are conservatively concluded to be greater than the less-than-significant impacts of the Project. However, potential TAC impacts under Alternative 2 would be less than significant.

b. Cultural Resources

(1) Historical Resources

Like the Project, Alternative 2 would remove the existing commercial uses and their associated parking areas. The existing on-site buildings are not considered historical resources. In addition, due to the distance between the Project Site and the nearest historical resource, as well as intervening development, Alternative 2 would not result in significant impacts with respect to these resources. Therefore, impacts to historical resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Alternative 2 would construct the same number of subterranean parking levels as the Project, but the subterranean parking levels would have a smaller footprint and less excavation would be required. Alternative 2 would also comply with the same regulatory requirements and implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. As such, due to the reduced excavation, the potential to uncover previously unidentified archaeological resources would be less than the less-than-significant-with-mitigation impacts of the Project.

c. Energy

(1) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Like the Project, the electricity demand during construction of Alternative 2 would vary throughout the construction period based on the construction activities being

performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 2 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 2 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. In addition, LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site. Therefore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Overall, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than the Project, due to the reduction in total new floor area from 882,250 square feet under the Project to 422,834 square feet under Alternative 2. Additionally, as previously discussed, Alternative 2 would result in fewer net daily vehicle trips than the Project. Thus, the associated consumption of petroleum-based fuels under Alternative 2 would also be less than the Project. Accordingly, under Alternative 2, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 2 would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 2 would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 2 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 2 would involve a different mix of land uses than the Project (i.e., office in place of residential) but would reduce the total amount of development on the

Project Site by approximately 50 percent as compared to the Project. Therefore, under Alternative 2, the total energy and water consumption would be reduced compared to the Project. Additionally, as discussed above in Section V.B.2.a.(2)(a), the number of trips generated by Alternative 2 would be less than the number of trips generated by the Project. Thus, the amount of GHG emissions generated by Alternative 2 would be less than the amount generated by the Project. As with the Project, Alternative 2 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the City's Green Building Ordinance and the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 2 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans as set forth in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

e. Land Use

(1) Physical Division of a Community

Alternative 2 would develop commercial uses that are permitted by the Project Site's current Highway Oriented Commercial land use designation and C2-1 zone. The proposed uses under Alternative 2 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of commercial and mixed uses along the Sunset Boulevard corridor. Therefore, similar to the Project, Alternative 2 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict with Land Use Plans

As previously described, Alternative 2 would develop four four-story, 65-foot-tall commercial buildings on the Project Site. Alternative 2 would comply with the Project Site's existing Highway Oriented Commercial land use designation and C2-1 (Commercial, Height District 1) zoning which permits commercial uses, both of which permit a maximum FAR of 1.5:1. Height District 1 within the C2 zone normally imposes no height limitation. Alternative 2 would comply with these standards by developing 422,834 square feet of commercial uses on the Project Site, resulting in a FAR of 1.5:1. However, unlike the Project which complies with the Vermont/Western Station Neighborhood Area Specific Plan (Specific Plan), Alternative 2 would be inconsistent with Section 8.B.2 of the Specific Plan, which permits a maximum building height of 35 feet and a maximum FAR of 1.5:1 for projects comprised exclusively of commercial uses and would require a Specific Plan amendment to permit the proposed height. Alternative 2 would otherwise be generally

consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including Southern California Association of Governments' (SCAG) regional plans, the General Plan Framework Element, the Hollywood Community Plan, the Specific Plan, the Hollywood Redevelopment Plan, and the Los Angeles Municipal Code (LAMC). Therefore, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

f. Noise

(1) Construction

Alternative 2 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation), but would not require the same amount of excavation and soil export as the Project since Alternative 2 would construct smaller subterranean parking levels and less overall square footage. As with the Project, construction of Alternative 2 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 2 would not require the same extent of site excavation, amount of soil export, or overall construction as the Project, the amount and the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 2 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 2 would also be similar to those that would occur under the Project. Alternative 2 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels during construction. As with the Project, construction of Alternative 2 would result in significant and unavoidable impacts with respect to on-site construction noise and on-site construction vibration (pursuant to the threshold for human annoyance).

As discussed in Section IV.F, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Since Alternative 2 would not require the same extent of site excavation and soil export necessary under the Project, the number of construction haul trucks, and thereby trips, would be reduced. Thus, it can be reasonably concluded that temporary noise impacts from off-site construction traffic generated by Alternative 2 would also be less than significant and less than the impacts of the Project. Since the vibration impacts from off-site construction traffic are

evaluated based the maximum ground-borne level generated by an individual truck, the off-site construction vibration impacts (pursuant to the threshold for building damage and human annoyance) under Alternative 2 would also be less than significant and similar to the Project. However, although construction haul trucks and trips would be reduced under Alternative 2, truck traffic from the Project and related projects could still exceed the ambient noise levels along the haul route by 5 dBA or more. Thus, similar to the Project, it is conservatively assumed that cumulative impacts with respect to off-site construction noise under Alternative 2 would be significant and unavoidable.

(2) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including outdoor mechanical equipment, loading dock and trash compactors, parking, and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources. Alternative 2 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 2 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. The proposed loading dock and trash collection areas for Alternative 2 would be located in similar areas as the Project. Thus, noise impacts from loading dock and trash collection areas would be similar to the Project. Overall, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, using the LADOT VMT Calculator, development of Alternative 2 would result in 1,029 net daily trips compared to 2,373 with the Project.⁹ Therefore, off-site noise associated with Project traffic would be less than the Project. Impacts would be less than significant and less compared to the less-than-significant impacts of the Project.

⁹ *Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR.*

g. Population and Housing

(1) Construction

As discussed in Section IV.G, Population and Housing, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Additionally, as the overall amount of construction in Alternative 2 would be less than the Project, fewer construction workers would be needed. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Operation

As previously described, Alternative 2 would develop 422,834 square feet of commercial uses consisting of 322,834 square feet of office uses, 50,000 square feet of market uses, 35,000 square feet of retail uses, and 15,000 square feet of restaurant uses, but unlike the Project, would not include residential uses. As such, this Alternative would not contribute directly to population growth in the region. However, this Alternative would not advance the City's goal of generating more housing for the region in a developed, infill location.

The proposed commercial uses would result in a net increase of 1,251 employees, which is greater than the net increase of 35 on-site employees with the Project.¹⁰ This would represent 0.82 percent of the growth between 2017 and 2026 (i.e., the Project buildout year) and 0.07 percent of total employment in the City of Los Angeles in 2026. Additionally, some of these positions are likely to be filled by persons already residing in the Hollywood area or in neighboring areas/cities and who generally would not relocate their households due to such employment opportunities. In the event some jobs are filled by

¹⁰ Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, Table 1 and Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR. Specifically, using the rates for General Office (4 employees/thousand square feet [ksf]), Supermarket (4 employees/ksf), and General Retail (2 employees/ksf), Alternative 2 would result in 1,591 employees. Using the rates for Supermarket, General Retail, and Fast-Food Restaurant, the existing 82,271 square feet of occupied commercial uses would result in 340 employees. The 18,525 square foot vacant commercial space is presumed to have no employees.

persons from outside the area who relocate for their job, limited indirect population growth and associated housing demand could occur, though such demand would be less than the Project. This demand could be met by existing vacancies in the surrounding housing market, as well as by the substantial number of new units currently planned in Hollywood. As such, similar to the Project, Alternative 2 would not induce substantial population growth or exceed SCAG's population forecast for the City or the SCAG region.

Overall, while Alternative 2 would result in more on-site jobs than the Project, it would not represent any of the population growth in the City. As a result, impacts would be less than significant and less than the less-than-significant impacts of the Project.

h. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of construction. Similar to the Project, construction activities under Alternative 2 would have the potential to result in accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 2, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Sunset Boulevard, and other main connectors due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Furthermore, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore,

construction-related impacts related to fire protection services under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project because the construction duration would be shorter.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 82, the “first-in” station, as well as Fire Station Nos. 52, 27, and 35. As Alternative 2 would not develop residential uses and the overall square footage would be reduced, the resulting increase in service population would be less than the Project. Specifically, the proposed uses in the Zoning Compliant All Commercial Alternative would result in a net service population increase of 1,251 persons, consisting solely of employees, compared to the net increase in residential service population of 1,771 persons with the Project. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 2 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, impacts related to fire protection services such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project due to a reduction in the service population compared to the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of construction. Similar to the Project, the demand for police protection services during construction of Alternative 2 would be offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature and would be limited to construction personnel. Alternative 2 would implement the same project design features as the Project during construction, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services. Similar to the Project, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips associated with construction of Alternative 2 would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan, including a Worksite Traffic

Control Plan, would be implemented during construction of Alternative 2 to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project because the construction duration would be shorter.

(b) Operation

Alternative 2 would develop retail uses on the Project Site and would generate a net increase in police service population of approximately 1,251 persons based on employment generation factors published by LADOT. This estimate is less than the Project's net increase in estimated police service population of 1,806 persons, and Alternative 2 would not include any residents. Therefore, Alternative 2 would increase the existing police service population of the Hollywood Community Police Station, but to a lesser extent than the Project. Alternative 2 does not include residential uses and therefore would not affect the current officer-to-resident ratio for the Hollywood Division. Furthermore, Alternative 2 would implement similar project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 2. Thus, as with the Project, Alternative 2 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 2 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 2 would be less.

(3) Schools

(a) Construction

Similar to the Project, Alternative 2 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 2. Therefore, the construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction

under Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 2 does not include the development of residential uses. Thus, Alternative 2 would not directly generate school-aged children and a corresponding demand for school services. Therefore, implementation of Alternative 2 would not result in a direct increase in the number of students within the service area of the LAUSD. As such, the increased demand for school services provided by the LAUSD would be reduced under Alternative 2 compared to the Project. In addition, the number of students that could be indirectly generated by Alternative 2 as a result of employment opportunities associated with the proposed retail uses would not be anticipated to be substantial because most employees would likely reside in the vicinity of the Project Site and thus are already accounted for. Furthermore, pursuant to Senate Bill (SB) 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of construction associated with Alternative 2. Therefore, construction employment generated by Alternative 2 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of

the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 2 would develop commercial uses and would not include the development of residential uses. Thus, implementation of Alternative 2 would not result in a direct increase in the number of residents. In addition, as employees of Alternative 2 would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by Alternative 2 would be filled by people already residing in the vicinity of the Project Site and who are already accounted for in the library service population, employees and the potential indirect population generation attributable to those employees would generate minimal demand for library services. As such, any indirect or direct demand for library services generated by the employees of Alternative 2 would be negligible. Impacts on library facilities and services would be less than significant and less than the less-than-significant impacts of the Project.

(5) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 2 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Alternative 2 construction is negligible. Therefore, the construction workers associated with Alternative 2 would not result in a notable increase in the residential population of the Project Site vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 2, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 2.

In addition, as with the Project, construction of Alternative 2 would not be expected to result in access restrictions to City parks and recreational facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the vicinity of the Project Site.

Based on the above analysis, construction of Alternative 2 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 2 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Alternative 2 would develop commercial uses and would not include the development of residential uses. Thus, implementation of Alternative 2 would not result in on-site residents who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees of Alternative 2 may utilize local parks and recreational facilities, the increased demand would be negligible because they are likely to use parks and recreational facilities near their homes, or if they live near the Project Site are already taken into account. Therefore, Alternative 2 would result in a reduced demand for public parks and recreation services compared to the Project, and the operation of Alternative 2 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Impacts to park and recreation facilities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

i. Transportation

As discussed above, Alternative 2 would develop 422,834 square feet of commercial uses consisting of 322,834 square feet of office space, 50,000 square feet of market space, 35,000 square feet of retail space, and 15,000 square feet of restaurant space. The total of 422,834 square feet of commercial uses under Alternative 2 would be reduced as compared to the total 882,250 square feet proposed by the Project and would also result in a lower total on-site population under Alternative 2. As such, impacts to transit, bicycle, and pedestrian facilities would be less than the less-than-significant impacts of the Project. Additionally, as discussed further below, impacts with respect to VMT would be less than significant. Therefore, impacts associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than the Project's less than significant impacts.

With respect to VMT, Alternative 2 does not include any residential uses and would, therefore, not generate any household VMT per capita and would not result in a significant household impact. Similar to the Project, the commercial uses proposed under Alternative 2 would replace larger, similar uses on the Project Site and are considered local serving. Therefore, these components would not increase VMT. When accounting for the same project design features as the Project, the office uses proposed under Alternative 2 would generate 9,524 total work VMT, resulting in 6.0 work VMT per capita which is below the significance threshold for the Central Area Planning Commission (APC) which is 7.6.¹¹ Additionally, like the Project, Alternative 2 is a mixed-use development which is favored under VMT methodology. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and less than the Project which is less than significant.

Furthermore, Alternative 2 would not introduce hazardous design features, and like the Project, no impact would occur. Lastly, similar to the Project, Alternative 2 would not interfere with emergency access and impacts would be less than significant.

j. Tribal Cultural Resources

Alternative 2 would construct the same number of subterranean parking levels as the Project, but the levels would have a smaller footprint and fewer spaces, resulting in less excavation. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be less than that of the Project. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in the amount of construction that would be required under Alternative 2. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the

¹¹ Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR.

temporary and intermittent demand for water during construction under Alternative 2 would also be expected to be met by the City's available water supplies. Similarly, the existing City of Los Angeles Department of Water and Power (LADWP) water infrastructure would be adequate to provide the water flow necessary to serve Alternative 2. Furthermore, as with the Project, the design and installation of new service connections under Alternative 2 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 2, and would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 2 would develop approximately 422,834 square feet of commercial uses on the Project Site. As shown in Table V-2 on page V-42, based on wastewater generation rates provided by the City of Los Angeles Bureau of Sanitation, (LASAN) and information provided by LADWP, Alternative 2 would result in a net increase in demand of 49,258 gallons per day (gpd), which is less than the Project's net increase in demand of 80,761 gpd,. As provided in the Water Supply Assessment (WSA) prepared for the Project, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 2 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 2 since the water demand would be lower than the Project and the Project Site's existing uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 2 to accommodate the new building. Thus, impacts to water supply under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 2, existing sewer laterals would be capped, and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 2 would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's Integrated Resources Plan (IRP).

**Table V-2
Estimated Water Demand for Alternative 2**

Land Use	Unit	Demand Rate ^a	Total Water Demand (gpd)
Existing			
Grocery Store/Fast Food	100,796 sf		13,827 ^b
<i>Subtotal</i>			13,827
Proposed			
Office	322,834 sf	120 gpd/1,000 sf	38,740
Restaurant	15,000 sf	30 gpd/seat ^c	15,000
Market	50,000 sf	50 gpd/1,000 sf	2,500
Retail	35,000 sf	50 gpd/1,000 sf	1,750
Landscaping			1,985 ^d
Cooling Tower			3,110 ^e
<i>Subtotal</i>			63,085
Total Net Water Demand			49,258
<p>gpd = gallons per day sf = square feet</p> <p>^a Water demand calculations are based on rates provided by LADWP in the Project's Water Supply Assessment included as Appendix R of this Draft EIR.</p> <p>^b Existing water demand is based on LADWP billing data (average 4 years from August 2013 to July 2017).</p> <p>^c Analysis assumes 30 square feet per seat.</p> <p>^d Analysis conservatively assumes the same water demand for landscaping as the Project.</p> <p>^e Analysis conservatively assumes the same size cooling tower required for the Project.</p> <p>Source: Los Angeles Department of Water and Power, Water Supply Assessment—5420 Sunset Boulevard Project, December 12, 2017; Eyestone Environmental, 2021.</p>			

Additionally, as with the Project, Alternative 2 may include construction activities associated with the installation of new or relocated sewer connections. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 2 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

As shown in Table V-3 on page V-44, the 422,834 square feet of commercial uses proposed by Alternative 2 would result in a net increase of 45,844 gpd of wastewater from the Project Site. This is less than the net increase of 175,818 gpd from the Project, which is conservative in that it assumes the proposed pools would be drained daily, which is not the case. Similar to the Project, the wastewater generated by Alternative 2 would be accommodated by the existing capacity of the Hyperion Water Reclamation Plant (HWRP) and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 2 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. As discussed in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR, LASAN determined that the existing lines within Western Avenue and Serrano Avenue would have adequate capacity to accommodate the additional demand generated by the Project, future growth, and existing demand. Given that Alternative 2 would result in less total average daily wastewater than the Project, there would also be sufficient capacity within these sewer lines to serve the wastewater flows of Alternative 2. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 2 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts of the Project.

**Table V-3
Estimated Wastewater Generation for Alternative 2**

Land Use	Unit	Generation Rate^a	Total Wastewater Generation (gpd)
Existing			
Grocery Store	78,328 sf	25 gpd/1,000 sf	1,958
Commercial (vacant)	18,525 sf	N/A	0
Restaurant	3,943 sf	300 gpd/1,000 sf	1,183
<i>Subtotal</i>			<i>3,141</i>
Proposed			
Office	322,834 sf	120 gpd/1,000 sf	38,740
Restaurant	15,000 sf	300 gpd/1,000 sf	4,500
Market	50,000 sf	100 gpd/1,000 sf	5,000
Retail	35,000 sf	25 gpd/1,000 sf	875
<i>Subtotal</i>			<i>49,025</i>
Total Net Wastewater Generation			45,844
<hr/> <p><i>gpd = gallons per day</i> <i>sf = square feet</i> ^a <i>Based on sewage generation factors provided by LASAN.</i> <i>Source: Eyestone Environmental, 2021.</i></p>			

(b) Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 2 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 2 would not eliminate the Project's significant and unavoidable impacts with respect to on-site construction noise and on-site construction vibration (pursuant to the threshold for human annoyance). In addition, Alternative 2 would reduce, but not eliminate the Project's contribution to potentially significant cumulative on-site and off-site construction noise impacts. In addition, impacts with respect to TAC

emissions during operation would be greater than the Project, but would remain less than significant. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would remove the existing commercial uses and their associated parking and construct new commercial uses on the Project Site. As such, Alternative 2 would not meet the Project's underlying purpose to develop a high-quality mixed-use development that provides new multi-family housing and retail and restaurant uses that serve the community and promote walkability. Specifically, Alternative 2 would not meet the following Project objectives because it does not include housing:

- Provide a mix of uses that maximizes building density at a location served by public transit and locate residential uses in areas that reduce automobile dependency in a transit priority area.
- Provide needed housing near public transit by constructing high density residential dwelling units to serve a range of tenants, and develop new housing stock at an infill location close to commercial and office uses.
- To promote local and regional mobility objectives by concentrating higher-density housing along Sunset Boulevard, a commercial corridor, and providing a mix of residential and neighborhood-serving commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, and supported by recreational amenities and commercial services.

Alternative 2 would, however, partially meet the following Project objectives:

- Promote fiscal and community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through new housing.
- Improve the visual character of the Project area by redeveloping a project site currently improved with one-story commercial uses and associated surface parking with a new, mixed-use project that utilizes and conforms to the maximum Floor Area Ratio permitted by existing Vermont/Western Station Neighborhood Area Plan.
- Meet the objectives of the Vermont/Western Station Neighborhood Area Plan to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses such as neighborhood-serving commercial uses and publicly accessible plazas and paseos.

- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

Alternative 2 would redevelop the Project Site, but since no residential uses are proposed, Alternative 2 would not meet the Project's underlying purpose or any of the objectives pertaining to housing.

V. Alternatives

C. Alternative 3: Zoning Compliant Hotel Alternative

1. Description of the Alternative

Under this Alternative, the Project Site would be developed with a hotel in accordance with the existing C2-1 (Commercial, Height District 1) zoning for the Project Site. Height District 1 within the C2 zone normally imposes no height limitation and a maximum FAR of 1.5:1. However, Section 8.B.2 of the Specific Plan permits a maximum building height of 35 feet and a maximum FAR of 1.5:1 for projects comprised exclusively of commercial uses. Alternative 3 would replace the Project's proposed uses with a hotel. Specifically, Alternative 3 would develop a 422,834 square-foot hotel with 550 rooms and a variety of amenities such as pools, spas, and outdoor decks. The proposed 422,834 square-foot development is less than the 882,250 square feet proposed by the Project. Due to the reduced size, construction duration would be shorter than the Project. Like the Project, the hotel would consist of four buildings centered around north-south and east-west paseos.¹² The four buildings would be three stories and approximately 45 feet in height, which is less than the Project. The Zoning Compliant Hotel Alternative would not be required to include open space, but would include the same pedestrian paseo and plaza as the Project that would include paving materials, raised planters, outdoor dining areas, and landscape elements that would enhance the Sunset Boulevard streetscape adjacent to the Project Site. A total of 635 vehicle parking spaces would be provided in two subterranean parking levels and one partial at-grade level. The subterranean parking levels would have a smaller footprint than the Project and would, therefore, require less excavation. Alternative 3 would provide 42 bicycle parking spaces with short-term spaces located along Sunset Boulevard and Western Avenue, and long-term spaces in the subterranean parking levels. Vehicular access for Alternative 3 would be provided via two driveways on Western Avenue, one driveway on Sunset Boulevard, and one driveway on Serrano Avenue, and pedestrian access would be from Sunset Boulevard, Western Avenue, and Serrano Avenue. Alternative 3 would require the same entitlements as the Project, as well as a

¹² While the proposed building would appear as four separate structures, these structures collectively comprise one building per the City's Building Code due to the unifying subterranean parking structure.

Specific Plan amendment to permit the proposed building height and conditional use permit to allow a hotel within 500 feet of residential uses.¹³

2. Environmental Impacts

a. Aesthetics

As discussed previously, PRC Section 21099 applies to the Project. Therefore, the Project is exempt from aesthetic impacts. While Alternative 3 is located on an infill site within a transit priority area, PRC Section 21099 does not apply to Alternative 3 because it is not a residential, mixed-use residential, or employment center project. An analysis of all the aesthetics thresholds is therefore provided below.

(1) Scenic Vistas

The Project Site is currently occupied by a one-story commercial grocery store, vacant commercial use and restaurant uses, as well as their associated parking areas. Alternative 3 would remove these uses and construct four 3-story buildings up to 45 feet in height. Construction of Alternative 3 would not obstruct views of visual resources in the vicinity such as the Hollywood Hills and Griffith Observatory, which are primarily available from area roadways.

There are no visual resources within the Project Site that can be seen from public vantage points. As is the case under existing conditions, future views with implementation of Alternative 3 would continue to depict the highly urbanized area stretching from Hollywood to downtown Los Angeles and beyond. The Project Site would remain difficult to discern within the greater fabric of urban development. In terms of long-range views, Alternative 3 would not interfere with current views of the downtown skyline and distant horizon line that are available from public rights-of-way within the Hollywood Hills.

Based on the above, Alternative 3 would have a less-than-significant impact on scenic vistas. Because the Project does not have aesthetic impacts as a matter of law pursuant to PRC Section 21099, an impact comparison is not appropriate; however, the building height of Alternative 3 is 30 feet lower than the proposed Project height.

¹³ *The Specific Plan permits a maximum building height of 35 feet and a maximum FAR of 1.5:1 for projects comprised exclusively of commercial uses.*

(2) Scenic Highways

The Project Site is not located along a state scenic highway. The nearest officially eligible state scenic highway is along the Foothill Freeway (I-210), approximately 9.5 miles northeast of the Project Site,¹⁴ and the nearest City-designated scenic parkway is along Mulholland Drive, approximately 2.7 miles northwest of the Project Site.¹⁵ Regardless, the Project Site does not include any scenic resources such as protected trees, rock outcroppings, and historic buildings within a state scenic highway. No impact would occur. Because the Project does not have aesthetic impacts as a matter of law pursuant to PRC Section 21099, an impact comparison is not appropriate.

(3) Regulations Governing Scenic Quality

(a) Zoning

The Project Site is zoned by the LAMC as C2-1 (Commercial, Height District 1). The C2 zone permits a wide array of land uses, including retail stores, restaurants, amusement enterprises, auditoriums, studios, schools, and hospitals, as well as any land use permitted in the C1.5 (Limited Commercial) zone. The C1.5 zone allows for single-family, two-family, or apartment house uses permitted in the R4 (Multiple Dwelling) zone, and any land use permitted in the C1 zone. The C1 zone allows for any residential use permitted in the R3 (Multiple Residential) zone. Under the C2 zone, there are no front, side, or rear yard requirements, except for residential buildings, which shall conform to the requirements of the R4 zone. Height District 1 within the C2 zone normally imposes no height limitation and a maximum FAR of 1.5. However, this would be inconsistent with Section 8.B.2 of the Specific Plan, which permits a maximum building height of 35 feet and a maximum FAR of 1.5:1 for projects comprised exclusively of commercial uses.¹⁶

As described above, Alternative 3 would develop a 422,834 square-foot hotel with 550 rooms and a variety of amenities such as pools, spas, and outdoor decks. The proposed use would be consistent with the existing C2-1 zoning on the Project Site, although a Specific Plan amendment would be required to permit the proposed building height.

¹⁴ Caltrans, *List of Designated and Eligible State Scenic Highways*, August 2019.

¹⁵ *Mobility Plan 2035, Map A4, Citywide General Plan Circulation System—Central, Midcity Subarea*.

¹⁶ *Per Section 6.H of the Specific Plan, floor area associated with a hotel, motel, or apartment hotel use shall be counted as commercial floor area.*

(b) Citywide General Plan Framework

The City of Los Angeles General Plan Framework Element provides direction regarding the City's vision for future development in the City and includes an Urban Form and Neighborhood Design chapter to guide the design of future development. One of the key objectives of the Urban Form and Neighborhood Design Chapter is to enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm (Objective 5.5). Alternative 3 would enhance the built environment in the surrounding neighborhood and upgrade the quality of development by replacing the existing on-site buildings with new development that would include an architecturally updated and aesthetically upgraded design.

(c) Citywide Design Guidelines

The Citywide Design Guidelines establish guidelines to carry out the common design objectives that maintain neighborhood form and character while promoting quality design and creative infill development solutions. With respect to scenic quality, as discussed above, the Project would enhance the pedestrian experience with a new pedestrian-oriented building with new landscaping and amenities, including a publicly accessible pedestrian paseo and plaza, extensive open space, and new street trees along the street frontages.

(d) Conclusion

Based on the above, Alternative 3 would not conflict with applicable zoning and other regulations governing scenic quality. Because the Project does not have aesthetic impacts as a matter of law pursuant to PRC Section 21099, an impact comparison is not appropriate; however, the building height of Alternative 3 is 30 feet lower than the proposed Project height.

(4) Light and Glare

Alternative 3 would introduce new sources of light and glare that are typically associated with the development of a hotel, including architectural lighting, signage lighting, interior lighting, and security and wayfinding lighting. Similar to the Project, Alternative 3 would replace the existing on-site buildings and parking areas and would increase the number of vehicle trips to and from the Project Site. However, the Project would eliminate sources of glare associated with the existing surface parking lot on the Project Site.

Proposed lighting sources would be similar to other lighting sources in the Project vicinity and would not generate artificial light levels that are out of character with the surrounding area, which is densely developed and characterized by a high degree of human activity during the day and night. All lighting would meet applicable LAMC lighting

standards. Specifically, as required by LAMC Sec. 93.0117(b), exterior light sources and building materials would not cause more than two (2) foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; an elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas, or any other property containing a residential unit or units.

With respect to glare, similar to the Project, Alternative 3 would be designed in a contemporary architectural style and would feature various surface materials. Building materials could include tile, high density laminates, storefront windows, aluminum louvers, metal railings, exterior plaster, glass railings, and integrated signage and lighting. Alternative 3 would use anti-reflective glass or glass that has been treated with an anti-reflective coating in all exterior windows and building surfaces to reduce potential glare from reflected sunlight.¹⁷ Therefore, these materials would not have the potential to produce a substantial degree of glare.

Based on the above, impacts would be less than significant. Because the Project does not have aesthetic impacts as a matter of law pursuant to PRC Section 21099, an impact comparison is not appropriate; however, the building height of Alternative 3 is 30 feet lower than the proposed Project height.

b. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 3 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 3, construction activities would be reduced in comparison to the Project due to the overall reduction in development and excavation. However, the intensity

¹⁷ Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the Project's impacts and the same mitigation measures would be implemented. Therefore, impacts would be similar to the Project, which are less-than-significant with mitigation.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 3 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 3 would be less than those of the Project due to the overall reduction in development and excavation. As discussed above, construction activities under this Alternative would be similar to the Project on a daily basis. However, TAC impacts are evaluated on a long-term basis. As the overall amount of development under this Alternative would be less than the Project, the overall duration of construction activity would also be reduced. As a result, the duration of TAC exposure to nearby sensitive receptors under this Alternative would be less than the Project. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. Using LADOT's VMT Calculator, development of Alternative 3 would result in a net decrease in daily trips (-3,619) compared to an increase of 2,373 net daily trips with the Project.¹⁸ As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, impacts associated with regional operational emissions would be less than significant and less than the less-than-significant impacts of the Project.

¹⁸ Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 3 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 3 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Therefore, impacts would be less than significant and less than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. The hotel uses under this Alternative are not expected to operate as a warehousing or distribution facility which would tend to generate more heavy duty diesel truck trips. While the hotel uses under this alternative would generate more delivery truck trips in comparison to residential uses in the Project, the majority of delivery trucks are expected to be gasoline powered light and medium duty trucks (e.g., FedEx, UPS, post office). In addition, the number of loading docks under this Alternative would be minimal, reducing the number of heavy duty trucks that can visit the site on a daily basis. Emissions from diesel powered trucks however, would be similar or slightly greater than those of the Project.

The hotel uses associated with Alternative 3 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 3. Similar to the Project, Alternative 3 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Under Alternative 3, operational TAC emissions are conservatively concluded to be greater than the less-than-significant impacts of the Project. However, potential TAC impacts under Alternative 3 would also be less than significant.

c. Cultural Resources

(1) Historical Resources

Like the Project, Alternative 3 would remove the existing commercial uses and their associated parking areas. The existing on-site buildings are not considered historical resources. In addition, due to the distance between the Project Site and the nearest historical resource, as well as intervening development, Alternative 3 would not result in significant impacts with respect to these resources. Therefore, impacts to historical

resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Alternative 3 would construct the same number of subterranean parking levels as the Project, but the subterranean parking levels would be smaller and less excavation would be required. Alternative 3 would also comply with the same regulatory requirements and implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. As such, the potential to uncover previously unidentified archaeological resources would be less than the less-than-significant-with-mitigation impacts of the Project.

e. Energy

(1) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Like the Project, the electricity demand during construction of Alternative 3 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 3 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 3 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. In addition, LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site. Therefore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Overall, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than the Project. Additionally, as previously discussed, Alternative 3 would result in fewer daily vehicle trips than the Project. Thus, the associated consumption of petroleum-based fuels under Alternative 3 would also be less than the Project. Accordingly, under Alternative 3, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 3 would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 3 would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 3 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 3 would involve a different land use than the Project, but would reduce the total amount of development on the Project Site by approximately 50 percent. Therefore, under Alternative 3, the total energy and water consumption would be reduced compared to the Project. Additionally, as discussed in above Section V.C.2.a.(2)(a), the number of trips generated by Alternative 3 would be less than the number of trips generated by the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. As with the Project, Alternative 3 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the City's Green Building Ordinance and the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 3 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans as set forth in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. Thus, impacts related to GHG emissions under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

e. Land Use

(1) Physical Division of a Community

Alternative 3 would develop hotel uses that are permitted by the Project Site's current Highway Oriented Commercial land use designation, C2-1 zone, and the Specific Plan. The proposed uses under Alternative 3 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of commercial and mixed uses along the Sunset Boulevard corridor. Therefore, similar to the Project, Alternative 3 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict with Land Use Plans

As previously described, Alternative 3 would develop four 3-story, 45-foot hotel on the Project Site. Alternative 3 would comply with the Project Site's existing Highway Oriented Commercial land use designation and C2-1 (Commercial, Height District 1) zoning which permits hotel uses, both of which permit a maximum FAR of 1.5:1. Height District 1 within the C2 zone normally imposes no height limitation. Alternative 3 would comply with these standards by developing 422,834 square feet of hotel uses on the Project Site, resulting in a FAR of 1.5:1. However, unlike the Project which complies with the Specific Plan, Alternative 3 would be inconsistent with Section 8.B.2 of the Specific Plan, which permits a maximum building height of 35 feet and a maximum FAR of 1.5:1 for projects comprised exclusively of commercial uses and would require a Specific Plan amendment to permit the proposed height.¹⁹ Alternative 3 would otherwise be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including SCAG's regional plans, the General Plan Framework Element, the Hollywood Community Plan, the Specific Plan, the Hollywood Redevelopment Plan, and the LAMC. Therefore, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

¹⁹ *Per Section 6.H of the Specific Plan, floor area associated with a hotel, motel, or apartment hotel use shall be counted as commercial floor area.*

f. Noise

(1) Construction

Alternative 3 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation), but would not require the same amount of excavation and soil export as the Project since Alternative 3 would construct smaller subterranean parking levels. As with the Project, construction of Alternative 3 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 3 would not require the same extent of site excavation and soil export necessary under the Project, the amount and the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 3 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 3 would also be similar to those that would occur under the Project. Alternative 3 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels during construction. As with the Project, construction of Alternative 3 would result in significant and unavoidable impacts with respect to on-site construction noise and on-site construction vibration (pursuant to the threshold for human annoyance).

As discussed in Section IV.F, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Since Alternative 3 would not require the same extent of site excavation and soil export necessary under the Project, the number of construction haul trucks, and thereby trips, would be reduced. Thus, it can be reasonably concluded that temporary noise impacts from off-site construction traffic generated by Alternative 3 would also be less than significant and less than the impacts of the Project. Since the vibration impacts from off-site construction traffic are evaluated based the maximum ground-borne level generated by an individual truck, the off-site construction vibration impacts (pursuant to the threshold for building damage and human annoyance) under Alternative 3 would also be less than significant and similar to the Project. However, although construction haul trucks and trips would be reduced under Alternative 3, truck traffic from the Project and related projects could still exceed the ambient noise levels along the haul route by 5 dBA or more. Thus, similar to the Project, it is conservatively assumed that cumulative impacts with respect to off-site construction noise under Alternative 3 would be significant and unavoidable.

(2) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including outdoor mechanical equipment, loading dock and trash compactors, parking, and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources. Alternative 3 would introduce noise from similar on-site and off-site noise sources as the Project. However, it is anticipated that with the overall reduction in total floor area, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 3 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. The proposed loading dock and trash collection areas for Alternative 3 would be located in similar areas as the Project. Thus, noise impacts from loading dock and trash collection areas would be similar to the Project. Overall, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, using the LADOT VMT Calculator, development of Alternative 3 would result in a net decrease in daily trips (-3,619) compared to an increase of 2,373 net daily trips with the Project.²⁰ Therefore, off-site noise associated with Project traffic would be less than the Project. Impacts would be less than significant and less than the Project.

g. Population and Housing

(1) Construction

As discussed in Section IV.G, Population and Housing, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Additionally, the overall amount of construction in Alternative 3 would be less than the Project. Accordingly, fewer construction workers would be needed. Therefore, population impacts related to household growth in the City of Los Angeles or the

²⁰ Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR.

SCAG Region as a result of construction worker relocation under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Operation

As previously described, Alternative 3 would develop a 422,834-square-foot hotel with 550 rooms, but unlike the Project, would not include residential uses. As such, this Alternative would not contribute directly to population growth in the region and would not advance the City's goal of generating more housing for the region in a developed, infill location.

The proposed hotel would result in a net decrease of 65 employees, compared to the net increase of 35 on-site employees with the Project.²¹ Therefore, Alternative 3 would not represent any of employment growth forecasted for the City of Los Angeles or SCAG Region between 2017 and 2026. As such, Alternative 3 would not induce substantial unplanned population growth or exceed SCAG's population forecast for the City or the SCAG region. Additionally, because it does not include residential uses, Alternative 3 would not represent any of the population growth in the City. As a result, impacts would be less than significant and less than the Project.

h. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3 would be similar to that of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of construction. Similar to the Project, construction activities under Alternative 3 would have the potential to result in accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance

²¹ Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, Table 1 and Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR. Specifically, using the rate for Hotel (0.5 employee/room) Alternative 3 would result in 275 employees. Using the rates for Supermarket and Fast-Food Restaurant, the existing 82,271 square feet of occupied commercial uses would result in 340 employees. The vacant commercial space is presumed to have no employees.

with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 3, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Sunset Boulevard, and other main connectors due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Furthermore, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to fire protection services under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project because the construction duration would be shorter.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection, of this Draft EIR, the Project Site would be served by Fire Station No. 82, the “first-in” station, as well as Fire Station Nos. 52, 27, and 35. Since Alternative 3 would not develop residential uses, no increase in residential service population would occur, compared to the net increase in residential service population of 1,771 persons with the Project. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 3 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, impacts related to fire protection services such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project due to a reduction in the service population compared to the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 3 would be similar to that of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of construction. Similar to the Project, the demand for police protection services during construction of Alternative 3 would be offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. Alternative 3 would implement the same project design feature as the Project, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services.

Construction activities under Alternative 3 could also affect emergency response for police vehicles along Sunset Boulevard and main connectors due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan, including a Worksite Traffic Control Plan, would be implemented during Project construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project because the construction duration would be shorter.

(b) Operation

Alternative 3 would develop a hotel on the Project Site and would generate a net decrease in police service population of approximately 65 persons based on employment generation factors published by DCP and LADOT compared to existing conditions. This estimate is less than the Project's net increase in estimated police service population of 1,806 persons. Therefore, Alternative 3 would not increase the existing police service population of the Hollywood Community Police Station. Alternative 3 does not include residential uses and therefore would not affect the current officer-to-resident ratio for the Hollywood Division. Furthermore, Alternative 3 would implement similar project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 3. Thus, as with the Project, Alternative 3 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant

environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 3 would have the potential to affect emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant and less than the less-than-significant impacts of the Project since Alternative 3 would result in a net decrease in service population.

(3) Schools

(a) Construction

Similar to the Project, Alternative 3 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 3. Therefore, the construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 3 does not include the development of residential uses. Thus, Alternative 3 would not directly generate school-aged children and a corresponding demand for school services. Therefore, implementation of Alternative 3 would not result in a direct increase in the number of students within the service area of the LAUSD. As such, the increased demand for school services provided by the LAUSD would be reduced under Alternative 3 compared to the Project. In addition, the number of students that could be indirectly generated by Alternative 3 as a result of employment opportunities associated with the proposed retail uses would not be anticipated to be substantial because most employees would likely reside in the vicinity of the Project Site and therefore are already accounted for. Furthermore, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the surrounding area. Impacts related to schools would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, construction of Alternative 3 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 3 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of library facilities. Alternative 3 would develop hotel uses and would not include the development of residential uses. Thus, implementation of Alternative 3 would not result in a direct increase in the number of residents. In addition, as employees of Alternative 3 would be more likely to use library facilities near their homes during non-work hours and given that some of the employment opportunities generated by Alternative 3 would be filled by people already residing in the vicinity of the Project Site, employees and the potential indirect population generation attributable to those employees would generate minimal demand for library services. As such, any indirect or direct demand for library services generated by the employees of Alternative 3 would be negligible. Impacts on library facilities and services would be less than significant and less than the less-than-significant impacts of the Project.

(5) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 3 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment

patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 3 would not result in a notable increase in the residential population of the Project Site vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 3, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 3.

In addition, as with the Project, construction of Alternative 3 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project Site vicinity.

Based on the above analysis, construction of Alternative 3 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 3 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Residents are considered the primary users of parks and recreation facilities. Alternative 3 would develop hotel uses and would not include the development of residential uses. Thus, implementation of Alternative 3 would not result in on-site residents who would utilize nearby parks and/or recreational facilities. In addition, while it is possible that employees of Alternative 3 may utilize local parks and recreational facilities, the increased demand would be negligible. Therefore, Alternative 3 would result in a reduced demand for public parks and recreation services compared to the Project, and the operation of Alternative 3 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Impacts to park and recreation facilities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

i. Transportation

As discussed above, Alternative 3 would develop a 422,834 square foot hotel with 550 rooms. The total of 422,834 square feet of commercial uses under Alternative 3 would be reduced as compared to the total 882,250 square feet proposed by the Project and would also result in a lower total on-site population under Alternative 3. As such, impacts to transit, bicycle, and pedestrian facilities would be less than the less-than-significant impacts of the Project. Additionally, as discussed further below, impacts with respect to VMT would be less than significant, which is less than the Project. Therefore, impacts associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than the Project's less than significant impacts.

With respect to VMT, Alternative 3 would result in a net decrease of 3,619 daily trips and VMT when compared to the existing land uses on-site.²² Therefore, no further VMT analysis is required. Impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and less than the less than significant impacts of the Project.

Furthermore, Alternative 3 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 3 would not interfere with emergency access and impacts would be less than significant.

j. Tribal Cultural Resources

Alternative 3 would construct the same number of subterranean parking levels as the Project, but the levels would have a smaller footprint due to fewer parking spaces being required for the hotel use. Therefore, less excavation would be required. As such, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be less than that of the Project. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

²² Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. This demand would be less than the Project due to the reduction in the amount of construction that would be required under Alternative 3. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project's temporary and intermittent demand for water during construction could be met by the City's available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 3 would also be expected to be met by the City's available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 3. Furthermore, as with the Project, the design and installation of new service connections under Alternative 3 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 3, and would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 3 would develop a 422,834-square-foot hotel with 550 rooms and associated amenities. As shown in Table V-4 on page V-67, based on wastewater generation rates provided by LASAN and information provided by LADWP, Alternative 3 would result in a net increase in water demand of 57,549 gpd, which is less than the Project's net increase in demand of 80,761 gpd. As provided in the WSA prepared for the Project, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 3 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be lower than the Project and the Project Site's existing uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 3 to accommodate the new building. Thus, impacts to water supply under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

**Table V-4
Estimated Water Demand for Alternative 3**

Land Use	Unit	Demand Rate^a	Total Water Demand (gpd)
Existing			
Grocery Store/Fast Food	100,796 sf		13,827 ^b
<i>Subtotal</i>			13,827
Proposed			
Hotel	550 rm	120 gpd/rm	66,000
Pools/Spas	2,995 sf		281 ^c
Landscaping			1,985 ^d
Cooling Tower			3,110 ^e
<i>Subtotal</i>			71,376
Total Net Water Demand			57,549
<p>gpd = gallons per day rm = rooms sf = square feet</p> <p>^a Water demand calculations are based on sewage generation rates provided by LASAN as well as water demand rates provided by LADWP in the Project's Water Supply Assessment included as Appendix R of this Draft EIR.</p> <p>^b Existing water demand is based on LADWP billing data (average 4 years from August 2013 to July 2017).</p> <p>^c Analysis assumes the same size pools/spas as the Project. The WSA prepared for the Project provided total water demand only and not a specific demand rate.</p> <p>^d Analysis conservatively assumes the same water demand for landscaping as the Project.</p> <p>^e Analysis conservatively assumes the same size cooling tower required for the Project.</p> <p>Source: LASAN; Los Angeles Department of Water and Power, Water Supply Assessment—5420 Sunset Boulevard Project, December 12, 2017; Eyestone Environmental, 2021.</p>			

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 3, existing sewer laterals would be capped, and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 3 would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's IRP.

Additionally, as with the Project, Alternative 3 may include construction activities associated with the installation of new or relocated sewer connections. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 3 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 3 would be less than significant and similar to the less than significant impacts of the Project.

(b) Operation

As shown in Table V-5 on V-69, the 422,834-square-foot hotel proposed by Alternative 3 would result in a net increase of 142,594 gpd of wastewater from the Project Site. This is less than the net increase of 175,818 gpd from the Project, which is conservative in that it assumes the proposed pools would be drained daily, which is not the case. Similar to the Project, the wastewater generated by Alternative 3 would be accommodated by the existing capacity of the HWRP and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 3 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that Alternative 3 would result in less total average daily wastewater compared to that of the Project, it is anticipated that there would be sufficient capacity within these sewer lines to serve the wastewater flows of Alternative 3. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 3 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis,

**Table V-5
Estimated Wastewater Generation for Alternative 3**

Land Use	Unit	Generation Rate^a	Total Wastewater Generation (gpd)
Existing			
Retail	78,328 sf	25 gpd/1,000 sf	1,958
Commercial (vacant)	18,525 sf	N/A	0
Restaurant	3,943 sf	300 gpd/1,000 sf	1,183
<i>Subtotal</i>			<i>3,141</i>
Proposed			
Hotel	550 rm	120 gpd/rm	66,000
Pool/Spa (Building 2)			53,486
Pool/Spa (Building 3)			26,249
<i>Subtotal</i>			<i>145,735</i>
Total Net Wastewater Generation			142,594
<hr/> <i>gpd = gallons per day</i> <i>rm = room</i> <i>sf = square feet</i> ^a <i>Based on sewage generation factors provided by LASAN.</i> <i>Source: Eyestone Environmental, 2021.</i>			

may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 3 would be less than the Project because of the reduced amount of construction, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 3 would not eliminate the Project's significant and unavoidable impacts with respect to on-site construction noise and on-site construction vibration (pursuant to the threshold for human annoyance). In addition, Alternative 3 would reduce, but not eliminate the Project's contribution to potentially significant cumulative on- and off-site construction noise impacts and impacts with respect to TAC emissions during operation. Impacts related to conflicts with land use plans would be greater compared to the Project but would also be less than significant. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would replace the existing commercial uses and their associated parking areas with a new hotel on the Project Site. As such, Alternative 3 would not meet the Project's underlying purpose of developing a high-quality mixed-use development that provides new multi-family housing and retail and restaurant uses that serve the community and promote walkability. Specifically, Alternative 3 would not meet the following Project objectives because it does not include housing:

- Provide a mix of uses that maximizes building density at a location served by public transit and locate residential uses in areas that reduce automobile dependency in a transit priority area.
- Provide needed housing near public transit by constructing high density residential dwelling units to serve a range of tenants, and develop new housing stock at an infill location close to commercial and office uses.
- To promote local and regional mobility objectives by concentrating higher-density housing along Sunset Boulevard, a commercial corridor, and providing a mix of residential and neighborhood-serving commercial uses that are in close proximity to public transportation, including numerous bus lines, as well as rail transit, and supported by recreational amenities and commercial services.

Alternative 3 would, however, partially meet the following Project objectives:

- Promote fiscal and community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through new housing.
- Improve the visual character of the Project area by redeveloping a project site currently improved with one-story commercial uses and associated surface

parking with a new, mixed-use project that takes utilizes and conforms to the maximum Floor Area Ratio permitted by existing Vermont/Western Station Neighborhood Area Specific Plan.

- Meet the objectives of the Vermont/Western Station Neighborhood Area Specific Plan to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses such as neighborhood-serving commercial uses and publicly accessible plazas and paseos.
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

Alternative 3 would redevelop the project site, but since no residential uses are proposed Alternative 3 would not meet the Project's objectives pertaining to housing.

V. Alternatives

D. Alternative 4: Reduced Density Mixed-Use Alternative

1. Description of the Alternative

Alternative 4 would develop the same mix of uses as the Project, but all development would be reduced by 25 percent. Specifically, under this Alternative, the proposed housing units would be reduced from 735 to 551, and the proposed commercial space would be reduced from 95,000 to 71,250 square feet, consisting of a 51,750 square-foot supermarket, 12,000 square feet of retail uses, and 7,500 square feet of restaurant uses. Total floor area under Alternative 4 would be reduced from 882,250 square feet to 661,688 square feet. Due to the reduced size, construction duration would be shorter than the Project. Like the Project, this Alternative would develop four buildings centered around a north-south paseo and east-west fire lane.²³ The four buildings would be five stories and approximately 65 feet in height, approximately 10 feet less in height than the Project. The Reduced Density Mixed-Use Alternative would provide approximately 58,650 square feet of open space. A total of 689 vehicle parking spaces would be provided in two subterranean parking levels and in one at-grade parking level. The subterranean levels would have a smaller footprint than the Project and would therefore require less excavation. Alternative 4 would provide 294 bicycle parking spaces, consisting of 277 spaces for residential uses and 17 for commercial uses. Commercial bicycle parking spaces would be distributed on the sidewalks along Sunset Boulevard and Western Avenue and within the plaza, and paseos. Residential bicycle parking spaces would be provided within the parking levels. Vehicular access for Alternative 4 would be provided via two driveways on Western Avenue, one driveway on Sunset Boulevard, and one driveway on Serrano Avenue and pedestrian access to the ground-floor neighborhood-serving commercial uses would be from Sunset Boulevard, Western Avenue, and Serrano Avenue. Alternative 4 would require the same entitlements as the Project.

²³ *While the proposed building would appear as four separate structures, these structures collectively comprise one building per the City's Building Code due to the unifying subterranean parking structure.*

2. Environmental Impacts

a. Air Quality

(1) Construction

(a) Regional and Localized Air Quality Impacts

As with the Project, construction of Alternative 4 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section IV.A, Air Quality, of this Draft EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 4, it is anticipated that construction activities would be reduced in comparison to the Project due to the overall reduction in development and excavation. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, regional and localized impacts on these days would be similar to the Project, which is less than significant with mitigation.

(b) Toxic Air Contaminants

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section IV.A, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction emissions generated by Alternative 4 would be less than those of the Project due to the overall reduction in development and excavation. As discussed above, construction activities under this Alternative would be similar to the Project on a daily basis. However, TAC impacts are evaluated on a long-term basis. As the overall amount of development under this Alternative would be less than the Project, the overall duration of construction activity would also be reduced. As a result, the duration of TAC exposure to nearby sensitive receptors under this Alternative would be less than the Project. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 4 would be less when compared to the less-than-significant impacts of the Project.

(2) Operation

(a) Regional and Localized Air Quality Impacts

Similar to the Project, operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project Site and the consumption of electricity and natural gas. Using LADOT's VMT Calculator, development of Alternative 4 would result in a net increase of 154 daily trips compared to an increase of 2,373 net daily trips with the Project.²⁴ As vehicular emissions depend on the number of trips, vehicular sources would result in a smaller increase in air emissions compared to the Project. In addition, because the overall square footage would be reduced when compared to the Project, demand for electricity and natural gas would be less than the Project. Therefore, impacts associated with regional operational emissions would be less than significant and less than the less-than-significant impacts of the Project.

With regard to on-site localized area source and stationary source emissions, as with the Project, Alternative 4 would not introduce any major new sources of air pollution within the Project Site. Therefore, similar to the Project, localized impacts from on-site emission sources associated with Alternative 4 would also be less than significant. Such impacts would be less than those of the Project due to the overall decrease in building area. Therefore, impacts would be less than significant and less than the Project's less-than-significant impacts.

(b) Toxic Air Contaminants

As discussed in Section IV.A, Air Quality, of this Draft EIR, the primary sources of potential air toxics associated with Project operations include diesel particulate matter from delivery trucks. As this alternative would be smaller in size, the number of delivery trucks would also be reduced in comparison to the Project. However, the types of uses proposed with both the Project and Alternative 4 are not considered land uses that generate substantial TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes, which are not proposed by the Project or Alternative 4. Similar to the Project, Alternative 4 would not release substantial amounts of TACs and would be consistent with CARB and SCAQMD guidelines regarding TAC sources in proximity to existing sensitive land uses. Thus, as with the Project, potential TAC impacts under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

²⁴ Gibson Transportation Consulting, Inc., *Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project*, June 17, 2020. See Appendix T of this Draft EIR.

b. Cultural Resources

(1) Historical Resources

Like the Project, Alternative 4 would remove the existing commercial uses and their associated parking areas. The existing on-site buildings are not considered historical resources. In addition, due to the distance between the Project Site and the nearest historical resource, as well as intervening development, Alternative 4 would not result in significant impacts with respect to these resources. Therefore, impacts to historical resources would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Archaeological Resources

Alternative 4 would construct the same number of subterranean parking levels as the Project, but the subterranean parking levels would be smaller and less excavation would be required. Alternative 4 would also comply with the same regulatory requirements and implement the same mitigation measure as the Project in the event that archaeological resources are uncovered during site grading activities. As such, the potential to uncover previously unidentified archaeological resources would be less than the less-than-significant-with-mitigation impacts of the Project.

c. Energy

(1) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Like the Project, the electricity demand during construction of Alternative 4 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 4 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 4 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. In addition, LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site.

Therefore, as with the Project, construction activities would require energy demand that is not wasteful, inefficient, or unnecessary and would not be expected to have an adverse impact on available energy resources or the existing infrastructure. Overall, impacts on energy resources associated with short-term construction activities would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(2) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions, though with less development, overall demand for energy would be less than the Project. Additionally, as previously discussed, Alternative 4 would result in fewer daily vehicle trips than the Project. Thus, the associated consumption of petroleum-based fuels under Alternative 4 would also be less than the Project. Accordingly, under Alternative 4, the total energy consumption would be less than that of the Project. Similar to the Project, Alternative 4 would implement the same project design features as the Project, which would improve energy efficiency and reduce impacts on consumption of energy resources. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. Furthermore, Alternative 4 would be located in proximity to a variety of public transit options and would incorporate features to reduce vehicle trips, thereby reducing transportation fuel usage. Therefore, impacts to energy resources under Alternative 4 would be less than significant, and less than the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As discussed above, Alternative 4 would involve the same mix of land uses as the Project, but would reduce the total amount of development on the Project Site by 220,562 square feet. Therefore, under Alternative 4, the total energy and water consumption would be reduced compared to the Project. Additionally, as discussed above in Subsection V.D.2.a.(2)(a), the number of trips generated by Alternative 4 would be less than the number of trips generated by the Project. Thus, the amount of GHG emissions generated by Alternative 4 would be less than the amount generated by the Project. As with the Project, Alternative 4 would incorporate project design features to reduce GHG emissions and would be designed to comply with the City's Green Building Ordinance, as applicable. With compliance with the City's Green Building Ordinance and the implementation of comparable sustainability features as the Project, it is anticipated that Alternative 4 would be consistent with the GHG reduction goals and objectives included in adopted state, regional, and local regulatory plans as set forth in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR. Thus, impacts related to GHG emissions under Alternative 4

would be less than significant, and less than the less-than-significant impacts of the Project.

e. Land Use

(1) Physical Division of a Community

Alternative 4 would develop residential and commercial uses which are permitted by the Project Site's current Highway Oriented Commercial land use designation, the C2-1 zone, and the Specific Plan. The proposed uses under Alternative 4 would be compatible with and would complement existing and future development in the Project area, which is generally comprised of commercial and mixed uses along the Sunset Boulevard corridor. Therefore, similar to the Project, Alternative 4 would not disrupt, divide, or isolate any existing neighborhoods or communities and impacts associated with the physical division of a community would be less than significant and similar to the impacts of the Project.

(2) Conflict with Land Use Plans

As previously described, Alternative 4 would develop four 5-story, 65-foot mixed-use buildings on the Project Site. Alternative 4 would comply with the Project Site's existing Highway Oriented Commercial land use designation and C2-1 (Commercial, Height District 1) zoning which permits commercial and residential uses, both of which permit a maximum FAR of 1.5:1. Height District 1 within the C2 zone normally imposes no height limitation. Alternative 4 would comply with these standards by developing 661,688 square feet of residential and commercial uses on the Project Site, resulting in a FAR of 1.5:1. Alternative 4 would also be consistent with the Specific Plan, which permits a maximum building height of 75 feet and a maximum FAR of 3:1 for mixed-use Projects. Alternative 4 would be generally consistent with the overall intent of the applicable goals, policies, and objectives in local and regional plans that govern development on the Project Site, including SCAG's regional plans, the General Plan Framework Element, the Hollywood Community Plan, the Specific Plan, the Hollywood Redevelopment Plan, and the LAMC. Therefore, impacts related to land use consistency would be less than significant and similar to the less-than-significant impacts of the Project.

f. Noise

(1) Construction

Alternative 4 would involve the same general phases of construction as the Project (i.e., site grading and excavation, building construction, and finishing/landscape installation), but would not require the amount of excavation and soil export as the Project since Alternative 4 would construct smaller subterranean parking levels. Generally, the

same mix and volume of construction vehicles and machinery would be required on a given day, compared to the proposed Project. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. Since Alternative 4 would not require the extent of site excavation and soil export necessary under the Project, the amount and the overall duration of construction would be reduced. Notwithstanding, on-site construction activities and the associated construction noise and vibration levels would be expected to be similar during maximum activity days since only the overall duration, and not the daily intensity of construction activities and associated equipment noise, would decrease under Alternative 4 when compared to the Project. Noise and vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Therefore, noise and vibration impacts due to on-site construction activities under Alternative 4 would also be similar to those that would occur under the Project. Alternative 4 would comply with the same applicable regulatory requirements and implement the same project design features and mitigation measures as the Project to reduce on-site noise and vibration levels during construction. As with the Project, construction of Alternative 4 would result in significant and unavoidable impacts with respect to on-site construction noise and on-site construction vibration (pursuant to the threshold for human annoyance).

As discussed in Section IV.F, Noise, of this Draft EIR, the highest number of construction trucks would occur during the grading/excavation phase. Since Alternative 4 would not require the same extent of site excavation and soil export necessary under the Project, the number of construction haul trucks, and thereby trips, would be reduced. Thus, it can be reasonably concluded that temporary noise impacts from off-site construction traffic generated by Alternative 4 would also be less than significant and less than the impacts of the Project. Since the vibration impacts from off-site construction traffic are evaluated based the maximum ground-borne level generated by an individual truck, the off-site construction vibration impacts (pursuant to the threshold for building damage and human annoyance) under Alternative 4 would also be less than significant and similar to the Project. However, although construction haul trucks and trips would be reduced under Alternative 4, truck traffic from the Project and related projects could still combine to exceed the ambient noise levels along the haul route by 5 dBA or more. Thus, similar to the Project, it is conservatively assumed that cumulative impacts with respect to off-site noise during construction under Alternative 4 would be significant and unavoidable.

(2) Operation

As discussed in Section IV.F, Noise, of this Draft EIR, sources of operational noise under the Project include: (a) on-site stationary noise sources, including outdoor mechanical equipment, loading dock and trash compactors, parking, and activities within the proposed outdoor spaces; and (b) off-site mobile (roadway traffic) noise sources. Alternative 4 would introduce noise from similar on-site and off-site noise sources as the

Project. However, it is anticipated that with the overall reduction in total floor area, the noise levels from building mechanical equipment, outdoor spaces, and parking facilities would be reduced. In addition, similar to the Project, on-site mechanical equipment used during operation of Alternative 4 would comply with the regulations under LAMC Section 112.02, which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise levels on the premises of other occupied properties by more than 5 dBA. The proposed loading dock and trash collection areas for Alternative 4 would be located in similar areas as the Project. Thus, noise impacts from loading dock and trash collection areas would be similar to the Project. Overall, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With respect to off-site noise, using the LADOT VMT Calculator, development of Alternative 4 would result in a net increase of 154 daily trips compared to an increase of 2,373 net daily trips with the Project.²⁵ Therefore, off-site noise associated with Project traffic would be less than the Project. Impacts would be less than significant and less than the Project.

g. Population and Housing

(1) Construction

As discussed in Section IV.G, Population and Housing, of this Draft EIR, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by a particular development. Many construction workers are highly specialized (e.g., crane operators, steel workers, masons), and move from job site to job site as dictated by the demand for their skills. Additionally, the overall amount of construction in Alternative 4 would be less than the Project, so fewer construction workers may be needed. Therefore, population impacts related to household growth in the City of Los Angeles or the SCAG Region as a result of construction worker relocation under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Operation

Alternative 4 would develop the same mix of uses as the Project, but all development would be reduced by 25 percent. Specifically, under this Alternative, the

²⁵ Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR.

proposed housing units would be reduced from 735 to 551, and the proposed commercial space would be reduced from 95,000 to 71,250 square feet, consisting of a 51,750 square-foot supermarket, 12,000 square feet of retail uses, and 7,500 square feet of restaurant uses. The proposed 551 residential units would result in 1,328 residents compared to 1,771 residents with the Project.²⁶ This would represent 0.54 percent of the growth between 2017 and 2026 (i.e., the Project buildout year) and 0.03 percent of the total population in the City of Los Angeles in 2026. The proposed market, retail, and restaurant uses would result in a net decrease of 94 employees on the Project Site compared to a net increase of 35 employees with the Project.²⁷ Therefore, Alternative 4 would not represent any employment growth forecasted for the City of Los Angeles between 2017 and 2026. Thus, all impacts with respect to Population and Housing under Alternative 4 would be reduced when compared to the Project and Alternative 4 would not induce substantial unplanned population growth in the area either directly or indirectly. Impacts would be less than significant and less than the less-than-significant impacts of the Project.

h. Public Services

(1) Fire Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 4 would be similar to that of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of construction. Similar to the Project, construction activities under Alternative 4 would have the potential to result in accidental on-site fires from such sources as the operation of mechanical equipment and the use of flammable construction materials. Construction would occur in compliance with all applicable federal, state, and local requirements concerning the handling, disposal, use, storage, and management of hazardous waste. Thus, compliance with regulatory requirements would effectively reduce the potential for construction activities to expose people to the risk of fire or explosion related to hazardous materials.

²⁶ Based on a rate of 2.41 persons per multi-family unit based on the 2018 American Community Survey 5-Year Average Estimates per correspondence with Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019. ($551 * 2.42 = 1,328$ and $735 * 2.41 = 1,771$).

²⁷ Los Angeles Department of Transportation (LADOT) and Los Angeles Department of City Planning (DCP), City of Los Angeles VMT Calculator Documentation, Version 1.3, May 2020, Table 1 and Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR. Specifically, using the rates for Supermarket (4 employees/ksf) and General Retail (2 employees/ksf), Alternative 4 would result in 246 employees. Using the rates for Supermarket, General Retail, and Fast-Food Restaurant, the existing 82,271 square feet of occupied commercial uses would result in 340 employees. The vacant commercial space is assumed to have no employees.

Additionally, access to the Project Site and the surrounding vicinity could be impacted by construction activities under Alternative 4, such as temporary lane closures, roadway/access improvements, and the construction of utility line connections. Furthermore, construction activities also would generate traffic associated with the movement of construction equipment, the hauling of soil and construction materials to and from the Project Site, and construction worker traffic. Thus, although construction activities would be short-term and temporary for the area, construction activities could temporarily affect emergency response for emergency vehicles along Sunset Boulevard, and other main connectors due to delays caused by traffic during the construction phase. However, as with the Project, construction worker and haul truck trips would be expected to occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. Furthermore, like the Project, a Construction Traffic Management Plan would be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Therefore, construction-related impacts related to fire protection services under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project because the construction duration would be shorter.

(b) Operation

As discussed in Section IV.H.1, Public Services—Fire Protection of this Draft EIR, the Project Site would be served by Fire Station No. 82, the “first-in” station, as well as Fire Station Nos. 52, 27, and 35. Alternative 4 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. Therefore, the resulting increase in service population would be reduced by a similar margin when compared to the Project. Specifically, Alternative 4 would result in a net increase in residential service population of 1,328 persons compared to a net increase in residential service population of 1,771 persons with the Project. Thus, the demand for fire protection and emergency medical services would be reduced compared to the Project. In addition, similar to the Project, Alternative 4 would implement all applicable City Building Code and Fire Code requirements regarding structural design, building materials, site access, fire flow, storage and management of hazardous materials, alarm and communications systems, etc. Therefore, impacts related to fire protection services such that the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility would be required in order to maintain service would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project due to a reduction in the service population compared to the Project.

(2) Police Protection

(a) Construction

As previously described, the types of construction activities required for Alternative 4 would be similar to that of the Project. However, the overall duration of construction would be reduced compared to the Project due to the reduced amount of construction. Similar to the Project, the demand for police protection services during construction of Alternative 4 would be offset by the removal of the existing commercial uses on the Project Site. In addition, the daytime population at the Project Site during construction would be temporary in nature. Alternative 4 would implement the same project design features as the Project, which includes temporary security measures such as fencing, lighting, and locked entry to reduce the potential for theft and vandalism on the Project Site, thereby reducing the demand for police protection services. Construction activities under Alternative 4 could also affect emergency response for police vehicles along Sunset Boulevard and main connectors due to delays caused by traffic during the construction phase. However, given the permitted hours of construction and nature of construction projects, most, if not all, of the construction worker trips would occur outside the typical weekday commuter morning and afternoon peak periods, reducing the potential for traffic-related conflicts. In addition, a Construction Traffic Management Plan, including a Worksite Traffic Control Plan, would be implemented during Project construction to ensure that adequate and safe access is available within and near the Project Site during construction activities. Therefore, construction-related impacts to police protection services under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project because the construction duration would be shorter.

(b) Operation

Alternative 4 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. Specifically, Alternative 4 would result in a net increase in police service population of 1,234 persons, compared to 1,806 persons with the Project. The residential service population with Alternative 4 would be 1,328 residents compared to 1,771 residents with the Project. Therefore, Alternative 4 would increase the existing police service population of the Hollywood Community Police Station, but to a lesser extent than the Project. Like the Project, Alternative 4 would not decrease the current officer-to-resident ratio for the Hollywood Division. Furthermore, Alternative 4 would implement the same project design features as the Project requiring on-site security features, appropriate lighting to ensure security, and the prevention of concealed spaces. The project design features would help offset the increase in demand for police protection services generated by Alternative 4. Thus, as with the Project, Alternative 4 would not result in the need for new or physically altered police protection facilities, the construction of which would cause significant environmental impacts, in order to maintain service. Moreover, although traffic generated by Alternative 4 would have the potential to affect

emergency vehicle response to the Project Site and surrounding properties due to delays caused by the additional traffic, drivers of police emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens and flashing lights to clear a path of travel or driving in the lanes of opposing traffic. Therefore, the impact on police protection services would be less than significant and less than the less-than-significant impacts of the Project since the police service population generated by Alternative 4 would be less.

(3) Schools

(a) Construction

Similar to the Project, Alternative 4 would generate part-time and full-time jobs associated with its construction between the start of construction and full buildout. However, due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of the construction job opportunities presented by Alternative 4. Therefore, the construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for schools in the vicinity of the Project Site. Impacts on school facilities during construction under Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 4 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. Alternative 4 would result in a net increase of 212 students compared to a net increase of 304 students associated with the Project. Furthermore, as with the Project, pursuant to SB 50, the Applicant would be required to pay development fees for schools to the LAUSD prior to the issuance of building permits. Pursuant to Government Code Section 65995, the payment of these fees is considered mitigation of Project-related school impacts. Therefore, payment of applicable development school fees to the LAUSD would offset the impact of additional student enrollment at schools serving the Project area. Impacts related to schools would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(4) Libraries

(a) Construction

Similar to the Project, construction of Alternative 4 would result in a temporary increase of construction workers on the Project Site. Due to the employment patterns of

construction workers in Southern California, and the operation of the market for construction labor, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, construction employment generated by Alternative 4 would not result in a notable increase in the resident population or a corresponding demand for library services in the vicinity of the Project Site.

In addition, it is unlikely that construction workers would visit Project-area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts to library facilities and services during construction of Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Alternative 4 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. Therefore, the resulting increase in library service population would be reduced by a similar margin when compared to the Project. Specifically, Alternative 4 would result in a residential library service population of 1,328 persons compared to 1,771 persons with the Project. Thus, impacts to libraries would be reduced under Alternative 4 compared to the Project. As such, the demand for library services under Alternative 4 would be less than the less-than-significant impacts of the Project.

(5) Parks and Recreation

(a) Construction

Similar to the Project, construction of Alternative 4 would result in a temporary increase in the number of construction workers at the Project Site. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, the likelihood that construction workers would relocate their households as a consequence of working on the Project is negligible. Therefore, the construction workers associated with Alternative 4 would not result in a notable increase in the residential population of the Project vicinity, or a corresponding permanent demand for parks and recreational facilities in the vicinity of the Project Site.

As with the Project, during construction of Alternative 4, the use of public parks and recreational facilities by construction workers would be expected to be limited, as construction workers are highly transient in their work locations and are more likely to utilize parks and recreational facilities near their places of residence. Furthermore, while there is a potential for construction workers to spend their lunch breaks at the parks and recreational facilities near the Project Site, lunch breaks typically are not long enough for workers to take advantage of such facilities and return to work within the allotted time (e.g., 30 to 60 minutes). Therefore, it is unlikely that construction workers would utilize any parks and recreational facilities near the Project Site during the construction of Alternative 4.

In addition, as with the Project, construction of Alternative 4 would not be expected to result in access restrictions to City parks and recreation facilities in the vicinity of the Project Site, nor interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity.

Based on the above analysis, construction of Alternative 4 would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services or interfere with existing park usage. Therefore, impacts on parks and recreational facilities during construction of Alternative 4 would be less than significant and similar to the Project's less-than-significant impacts.

(b) Operation

Based on the 25-percent reduction in residential units, Alternative 4 would be required to provide less open space than the Project. Specifically, per LAMC Section 12.21G, Alternative 4 would provide 58,650 square feet of open space. Thus, Alternative 4 would not be expected to cause or accelerate substantial physical deterioration of off-site public parks or recreational facilities given the provision of on-site open space and recreational amenities. Similar to the Project, while it is possible that employees of Alternative 4 may utilize local parks and recreational facilities, the increased demand would be negligible as it is anticipated that employees and visitors would also primarily utilize on-site open space during their time spent at the Project Site, resulting in a negligible demand for surrounding parks and recreational facilities. Also similar to the Project, under Alternative 4 the applicant would be required to pay parks and recreation fees to the City that could be used to add or improve park facilities in the project vicinity. Therefore, impacts to park and recreation facilities would be less than significant under Alternative 4, and less than the less-than-significant impacts of the Project.

i. Transportation

As discussed above, Alternative 4 would develop the same mix of uses as the Project but all development would be reduced by 25 percent. Specifically, Alternative 4

would develop 551 multi-family residential units, 51,750 square feet of market uses, 12,000 square feet of retail uses, and 7,500 square feet of restaurant uses. The total of 661,688 square feet of commercial uses under Alternative 4 would be reduced as compared to the total 882,250 square feet proposed by the Project and would also result in a lower total on-site population under Alternative 4. As such, impacts to transit, bicycle, and pedestrian facilities would be less than the less-than-significant impacts of the Project. Additionally, as discussed further below, impacts with respect to VMT would be less than significant, which is less than the Project. Therefore, impacts associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be less than the Project's less than significant impacts.

With respect to VMT, Alternative 4 would generate 154 net new daily trips and 657 net new VMT.²⁸ Therefore, because Alternative 4 does not generate more than 250 net daily trips, no further VMT analysis is required. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less than significant and less than the less than significant impacts of the Project.

Furthermore, Alternative 4 would not introduce hazardous design features, so like the Project, no impact would occur. Lastly, similar to the Project, Alternative 4 would not interfere with emergency access and impacts would be less than significant.

j. Tribal Cultural Resources

Alternative 4 would construct the same number of subterranean parking levels as the Project, but the levels would have a smaller footprint and fewer spaces so less excavation would be required. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be less than that of the Project. Accordingly, impacts to tribal cultural resources would be less than the less-than-significant impacts of the Project.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would generate a short-term demand for water. This demand would be less than the Project due

²⁸ Gibson Transportation Consulting, Inc., "Traffic Analysis of Project Alternatives for the Sunset & Western Mixed-Use Development Project," June 17, 2020. See Appendix T of this Draft EIR.

to the reduction in the amount of construction that would be required under Alternative 4. As evaluated in Section IV.K.1, Utilities and Service Systems—Water Supply and Infrastructure, of this Draft EIR, the Project’s temporary and intermittent demand for water during construction could be met by the City’s available supplies during each year of construction. Since the water demand for construction activities would be reduced, the temporary and intermittent demand for water during construction under Alternative 4 would also be expected to be met by the City’s available water supplies. Similarly, the existing LADWP water infrastructure would be adequate to provide the water flow necessary to serve Alternative 4. Furthermore, as with the Project, the design and installation of new service connections under Alternative 4 would be required to meet applicable City standards. Therefore, impacts on water supply and infrastructure associated with short-term construction activities would be less than significant under Alternative 4, and would be less than the less-than-significant impacts of the Project.

(b) Operation

Alternative 4 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. As shown in Table V-6 on page V-88, based on wastewater generation rates provided by LASAN and information provided by LADWP, Alternative 4 would result in a net increase in demand of 56,595 gpd, which is less than the Project’s net increase in demand of 80,761. This number is also conservative in that it assumes similar residential amenities even with reduced development. As provided in the WSA prepared for the Project, the estimated water demand for the Project would not exceed the available supplies projected by LADWP. Therefore, the estimated net water demand under Alternative 4 would also be within the available and projected water supplies for normal, single-dry, and multi-dry years through the year 2040. In addition, the existing water distribution infrastructure would be adequate to serve Alternative 4 since the water demand would be lower than the Project and the Project Site’s existing uses. Furthermore, similar to the Project, the Applicant would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements under Alternative 4 to accommodate the new building. Thus, impacts to water supply under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

Similar to the Project, during construction of Alternative 4, existing sewer laterals would be capped and no sewage would enter the public sewer system. Temporary facilities such as portable toilet and hand wash areas would be provided by the contractor at the Project Site, and sewage from these facilities would be collected and hauled off-site. As such, wastewater generation from construction activities associated with Alternative 4

**Table V-6
Estimated Water Demand for Alternative 4**

Land Use	Unit	Demand Rate^a	Total Water Demand (gpd)
Existing			
Grocery Store/Fast Food	100,796 sf		13,827 ^b
<i>Subtotal</i>			13,827
Proposed			
Residential: Studio	188 du	75 gpd/du	14,100
Residential: 1-Bedroom	252 du	110 gpd/du	27,720
Residential: 2-Bedroom	111 du	150 gpd/du	16,650
Residential Base Demand Adjustment ^c			6,668
Residential Required Ordinances Water Savings ^d			(18,206)
Fitness Center	11,775 sf	650 gpd/1,000 sf	7,654
Leasing Office	6,750 sf	120 gpd/1,000 sf	810
Lounge	7,725 sf	50 gpd/1,000 sf	386
Outdoor Kitchen/Barbecue	1,125 sf	13 gpd/1,000 sf	15
Bike Center	2,168 sf	650 gpd/1,000 sf	1,409
Pools/Spas	2,995 sf		281 ^e
Residential Amenities Required Ordinances Water Savings ^d			(607)
Retail	19,829 sf	25 gpd/1,000 sf	496
Restaurant	257 seats ^f	30 gpd/seat	7,710
Market	44,325 sf	50 gpd/1,000 sf	2,216
Commercial Base Demand Adjustment ^c			34
Commercial Required Ordinances Water Savings ^d			(2,747)
Landscaping			4,019 ^g
Covered Parking ^h	530,773 sf	20 gpd/1,000 sf	349
Cooling Tower			3,110 ⁱ
<i>Subtotal</i>			70,422
Total Net Water Demand			56,595
<p><i>du = dwelling units</i> <i>gpd = gallons per day</i> <i>sf = square feet</i></p> <p>^a Water demand calculations are based on sewage generation rates provided by LASAN as well as water demand rates provided by LADWP in the Project's Water Supply Assessment included as Appendix R of this Draft EIR.</p> <p>^b Existing water demand is based on LADWP billing data (average 4 years from August 2013 to</p>			

Table V-6 (Continued)
Estimated Water Demand for Alternative 4

Land Use	Unit	Demand Rate ^a	Total Water Demand (gpd)
<p><i>July 2017).</i></p> <p>^c <i>Base Demand Adjustment is due to Ordinance No, 180,822 accounted for in the current version of LASAN Sewer Generation Rates.</i></p> <p>^d <i>The proposed development land uses will conform to Ordinance No. 184248, 2013 California Plumbing Code, 2013 California Green Building Code, 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.</i></p> <p>^e <i>Based on 30 sf per seat (7,711 square feet = 257 seats).</i></p> <p>^f <i>Analysis assumes the same size pools/spas as the Project. The WSA prepared for the Project provided total water demand only and not a specific demand rate.</i></p> <p>^g <i>Analysis conservatively assumes the same water demand for landscaping as the Project.</i></p> <p>^h <i>Auto parking water uses are based on LASAN Generation Rates table and 12 times/year cleaning assumption.</i></p> <p>ⁱ <i>Analysis conservatively assumes the same size cooling tower required for the Project.</i></p> <p><i>Source: LASAN; Los Angeles Department of Water and Power, Water Supply Assessment—5420 Sunset Boulevard Project, December 12, 2017; Eyestone Environmental, 2021.</i></p>			

would not cause a measurable increase in wastewater flows. Therefore, construction of the Project would not substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the City's IRP.

Additionally, as with the Project, Alternative 4 may include construction activities associated with the installation of new or relocated sewer connections. Such activities would be confined to trenching in order to place the sewer lines below surface and would be limited to the on-site wastewater conveyance infrastructure and minor off-site work associated with connections to the City's sewer lines in the streets adjacent to the Project Site. Similar to the Project, a Construction Traffic Management Plan would be implemented during the construction of Alternative 4 to reduce impacts to pedestrian and traffic flow, including emergency vehicle access, which could occur due to temporary off-site utility work. Therefore, construction-related impacts to the wastewater system under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

(b) Operation

Alternative 4 would develop the same mix of uses as the Project, but total development would be reduced by 25 percent. As shown in Table V-7 on page V-90, Alternative 4 would result in a net increase of 150,199 gpd of wastewater from the Project Site. This is less than the net increase of 175,818 gpd from the Project, which is

**Table V-7
Estimated Wastewater Generation for Alternative 4**

Land Use	Unit	Generation Rate^a	Total Wastewater Generation (gpd)
Existing			
Grocery Store	78,328 sf	25 gpd/1,000 sf	1,958
Commercial (vacant)	18,525 sf	N/A	0
Restaurant	3,943 sf	300 gpd/1,000 sf	1,183
<i>Subtotal</i>			3,141
Proposed			
Residential: Studio	188 du	75 gpd/du	14,100
Residential: 1-Bedroom	252 du	110 gpd/du	27,720
Residential: 2-Bedroom	111 du	150 gpd/du	16,650
Retail	19,829 sf	25 gpd/1,000 sf	496
Market	44,325 sf	100 gpd/1,000 sf	4,433
Restaurant	7,711 sf	300 gpd/1,000 sf	2,313
Bike Center	2,168 sf	650 gpd/1,000 sf	1,409
Lounge	7,725 sf	50 gpd/1,000 sf	386
Leasing Office	6,750 sf	120 gpd/1,000 sf	810
Fitness Center	11,775 sf	200 gpd/1,000 sf	2,355
Open Space	58,650 sf	50 gpd/1,000 sf	2,933
Pool/Spa (Building 2) ^b			53,486
Pool/Spa (Building 3) ^b			26,249
<i>Subtotal</i>			153,340
Total Net Wastewater Generation			150,199
<hr/> <i>du = dwelling units</i> <i>gpd = gallons per day</i> <i>sf = square feet</i> ^a <i>Based on sewage generation factors provided by LASAN.</i> ^b <i>Pools/spas are conservatively assumed to be the same size as the Project and drained daily.</i> <i>Source: Eyestone Environmental, 2021.</i>			

conservative in that it assumes the proposed pools would be drained daily, which is not the case. Similar to the Project, the wastewater generated by Alternative 4 would be accommodated by the existing capacity of the HWRP and impacts with respect to treatment capacity would be less than significant.

As with the Project, sewer service for Alternative 4 would be provided utilizing new or existing on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that Alternative 4 would result in a net decrease in total average daily wastewater compared to that of the Project, it is anticipated that there would be sufficient capacity within these sewer lines to serve the wastewater flows of Alternative 4. Furthermore, additional detailed gauging and evaluation, as required by LAMC Section 64.14, would be conducted to obtain final approval of sewer capacity and connection permit for Alternative 4 during the permitting process. All related sanitary sewer connections and on-site infrastructure under Alternative 4 would be designed and constructed in accordance with applicable standards.

Thus, impacts with regard to wastewater generation and infrastructure capacity under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

(3) Energy Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The energy consumed would be reduced compared to the Project due to the reduction in the overall amount of construction and duration of construction. Therefore, impacts on energy infrastructure associated with short-term construction activities would be less than significant under Alternative 4 and less than the less-than-significant impacts of the Project.

(b) Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity and natural gas relative to existing conditions. However, the consumption of electricity and natural gas under Alternative 4 would be less than the Project because of the reduced amount of new development, and the corresponding impact on energy infrastructure would be less than the Project. Therefore, impacts to energy infrastructure under Alternative 4 would be less than significant and less than the less-than-significant impacts of the Project.

3. Comparison of Impacts

As evaluated above, Alternative 4 would not eliminate the Project's significant and unavoidable impacts with respect to on-site construction noise and on-site construction

vibration (pursuant to the threshold for human annoyance). In addition, Alternative 4 would reduce, but not eliminate, the Project's contribution to potentially significant cumulative off-site construction noise impacts. All other impacts would be less than or similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

With an identical mix of uses as the Project, the Reduced Density Alternative would meet the Project's underlying purpose to develop a high quality mixed-use development that provides new multi-family housing and retail and restaurant uses that serve the community and promote walkability.

With the same mix of uses, Alternative 4 would also meet the following objectives to the same extent as the Project:

- Promote fiscal and community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through new housing.
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.
- To meet the objectives of the Vermont/Western Station Neighborhood Area Specific Plan to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses such as neighborhood-serving commercial uses and publicly accessible plazas and paseos.

Alternative 4 would meet the following Project objectives to a lesser extent than the Project:

- Provide a mix of uses that maximizes building density at a location served by public transit and locates residential uses in areas that reduce automobile dependency in a transit priority area.
- Improve the visual character of the Project area by redeveloping a project site currently improved with one-story commercial uses and associated surface parking with a new, mixed-use project that utilizes and conforms to the maximum Floor Area Ratio permitted by the Vermont/Western Station Neighborhood Area Specific Plan.

- Provide needed housing near public transit by constructing high density residential dwelling units to serve a range of tenants, and develop new housing stock at an infill location close to commercial and office uses.
- To promote local and regional mobility objectives by concentrating higher-density housing along Sunset Boulevard, a commercial corridor, and providing a mix of residential and neighborhood-serving commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, and supported by recreational amenities and commercial services.

V. Alternatives

E. 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.

With respect to identifying an Environmentally Superior Alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes Alternative 1, the No Project/No Build Alternative; Alternative 2, the Zoning Compliant All Commercial Alternative; Alternative 3, the Zoning Compliant All Hotel Alternative; and Alternative 4, the Reduced Density (25 Percent) Mixed-Use Alternative. Table V-1 beginning on page V-9 provides a comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the Project. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to CEQA Guidelines Section 15126.6(c), the analysis below addresses the ability of the alternatives to “avoid or substantially lessen one or more of the significant effects” of the Project.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project’s significant environmental impacts, including the Project’s significant and unavoidable impacts related to on-site noise during construction and on-site vibration during construction (pursuant to the threshold for human annoyance). In addition, Alternative 1 would avoid the Project’s significant cumulative on- and off-site noise impacts. However, the No Project/No Build Alternative would not meet any of the Project objectives or achieve the Project’s underlying purpose of developing the infill Project Site by constructing a mixed-use development that would provide new multi-family housing, and neighborhood-serving retail and restaurant uses to serve the Hollywood community and promote walkability.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative (Alternative 1—No Project/No Build Alternative), a comparative evaluation of the remaining alternatives indicates that Alternative 4, the Reduced Density Alternative would be the Environmentally Superior Alternative. As discussed above, Alternative 4 would not avoid the Project’s significant and unavoidable environmental impacts related to on-site construction noise or on-site

construction vibration (pursuant to the threshold for human annoyance). In addition, Alternative 4 would reduce, but not eliminate the Project's contribution to potentially significant cumulative on-site and off-site construction noise impacts. Alternative 4 would, however, further reduce many of the Project's less-than-significant impacts.

With an identical mix of uses as the Project, the Reduced Density Alternative would meet the Project's underlying purpose to develop a high quality mixed-use development that provides new multi-family housing, retail, and restaurant uses that serve the community and promote walkability.

However, with respect to housing, Alternative 4 would provide fewer needed housing units near public transit. Specifically, while not a specific objective of the Project, the 551 residential units included in Alternative 4 would provide 0.7 percent of the City's RHNA allocation compared to 0.9 percent with the Project.²⁹

Alternative 4 would meet the following Project objectives to a lesser extent as the Project due to the reduced amount of overall development and reduced amount of multi-family residential units:

- Provide a mix of uses that maximizes building density at a location served by public transit and locates residential uses in areas that reduce automobile dependency in a transit priority area.
- Improve the visual character of the Project area by redeveloping a project site currently developed with one-story commercial uses and associated surface parking with a new, mixed-use project that utilizes and confirms to the maximum Floor Area Ratio permitted by the Vermont/Western Station Neighborhood Area Specific Plan.
- Provide needed housing near public transit by constructing high density residential dwelling units to serve a range of tenants, and develop new housing stock at an infill location close to commercial and office uses.
- To promote local and regional mobility objectives by concentrating higher-density housing along Sunset Boulevard, a commercial corridor, and providing a mix of residential and neighborhood-serving commercial uses that are in close proximity to public transportation, including numerous bus lines as well as rail transit, and supported by recreational amenities and commercial services.

²⁹ *City of Los Angeles General Plan, Housing Element, Chapter 1: Housing Needs Assessment.*

Alternative 4 would meet the following objectives to the same extent as the Project:

- Promote fiscal and community benefits, economic development, and job creation, by creating construction and retail jobs, providing economic benefit to the City, and providing community benefits through new housing.
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.
- To meet the objectives of the Vermont/Western Station Neighborhood Area Specific Plan to create a street-level identity for the Project Site and improve the pedestrian experience through the introduction of active street adjacent uses such as neighborhood-serving commercial uses and publicly accessible plazas and paseos.