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 which will avoid or substantially lessen such significant effects. If specific economic, social, or other conditions make infeasible such alternatives, 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 avoid or substantially lessen any of 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 result in significant and unavoidable Project-level impacts with respect to on-site noise during construction and on-site and off-site vibration during construction (pursuant to the threshold for human annoyance). Cumulative impacts associated with on- and off-site noise during construction and off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also be significant and unavoidable. Accordingly, the following alternatives to the Project have been selected for evaluation based on the likelihood of the alternatives being able to substantially lessen one or more of the potentially significant impacts, the intent to provide a senior residential housing community that meets the needs of an increasingly aging population in the City by providing variety in housing together with integrated services, and CEQA's requirement to consider a reasonable range of alternatives:

- Alternative 1: No Project/No Build Alternative—Alternative 1 assumes that the Project would not be implemented, no new permanent development would occur within the Project Site, and the existing environment would be maintained. Thus, the physical conditions of the Project Site would remain as they are today.

- Alternative 2: Commercial/Residential Alternative—Alternative 2 would be developed in accordance with the parameters set forth by the existing zoning designations for the Project Site and would include both residential and commercial uses.

- Alternative 3: Senior Residential Alternative—Alternative 3 would include the development of 130 senior residential units in accordance with the parameters set forth by the existing zoning designations for the Project Site.

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 results of a search to find an alternative site on which the Project could be built determined that suitable similar locations are not available to meet the underlying purpose of the Project to provide a senior residential housing community that meets the needs of an increasingly aging population in the City by providing variety in housing together with integrated services, and Project objectives including locating senior citizen housing within reasonable walking distance of health and community facilities, services, and public transportation by integrating supporting services with the senior housing units in one building. Further, it is not expected that the Applicant can reasonably acquire, control, or have access to an alternative site of similar size. Therefore, an alternative site is not considered feasible as it is not expected that the Applicant can reasonably acquire, control, or have access to a suitable alternative site that would provide for the uses and square footage proposed by the Project. In addition, if a suitable alternative site could be found, it is anticipated that the significant and unavoidable impacts with respect to on-site and off-site noise and vibration sources during construction would still occur assuming the alternative site is located in an urban location. Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

Alternatives to Substantially Reduce or Eliminate Significant Noise and Vibration Impacts During Construction: As discussed in Section IV.F, Noise, of this Draft EIR, the Project would result in short-term significant unavoidable construction-related noise and vibration (human annoyance) impacts. Specifically, Project construction activities would result in significant unavoidable construction-related noise impacts related to on-site construction activities, and significant unavoidable vibration (human annoyance)

impacts related to both on-site construction activities and off-site construction traffic. The following approaches were considered to substantially reduce or avoid these impacts:

- Approach (a)—Extended Construction Duration: This approach would extend the construction period, thus reducing the amount of daily construction activity that would occur under the Project. This approach was rejected for the following reasons:

  - Construction noise levels are dependent on the number of construction equipment (on-site equipment or off-site construction trucks). With respect to on-site construction, a reduction in the number of pieces of on-site construction equipment would reduce the construction noise, depending on the number and type of equipment. Specifically, reducing the on-site construction equipment during the site demolition phase from 10 pieces to five pieces of equipment (50 percent reduction) would reduce the construction noise at the off-site receptors by 0.4 dBA L_{eq} at receptor locations R1, R2 and R6, 2.0 dBA L_{eq} at receptor location R5, and 2.7 dBA L_{eq} at receptor locations R3 and R4 (as compared to the Project). The estimated construction noise levels with a 50 percent reduction in the number of pieces of construction equipment would still exceed the significance threshold by up to 35.8 dBA L_{eq} at receptor location R1, 33.9 dBA L_{eq} at receptor location R2, and 41.3 dBA L_{eq} at receptor location R6 during the site demolition phase. Therefore, the construction noise levels under this approach (both on- and off-site construction noise) would be somewhat less than the Project (depending on the amount of reduction) but would still exceed the significance threshold. In addition, the reduction would be less than 3.0 dBA, which is the level where noise is perceptible. This approach would also be inefficient and would increase the number of days that sensitive receptors would be impacted by construction activities. Furthermore, due to the close proximity of the off-site noise sensitive receptors (e.g., receptor locations R1, R2 and R6 that are directly adjacent to the Project Site), it would not be practical to reduce the construction noise levels to below the significance threshold as a single piece of equipment would result in noise levels above the significance threshold. As such, the on-site noise impacts under this approach would not be substantially less than the Project and would remain significant from the on-site construction activities.

  - 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 an individual piece of construction equipment, and the approach would utilize similar construction equipment (e.g., a drill rig and large bulldozer). In addition, off-site construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also continue to be significant, similar to the Project due to heavy trucks traveling by sensitive receptors.

- Approach (b)—Central Location of Development: An approach where 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 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. The construction noise levels associated with the building phases for the proposed buildings placed closer to the center of the site would be lower than the Project. However, the noise level reduction, depending upon the setback from the property line, would be limited due the size of the Project Site (width of the development area varies from 100 feet to 230 feet). Specifically, moving the building footprint an additional 20 feet toward the center of the site would reduce the noise construction levels at off-site receptors locations R1, R2 and R6 by approximately 5 dBA L_{eq}, which would still exceed the significance thresholds even with mitigation measures. The estimated noise reduction at off-site receptor locations R3, R4 and R5 would be 1 dBA or lower. In addition, noise levels during site demolition, site preparation and grading 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 as with the Project.

  - Similar to the Project, the on-site construction vibration impacts (human annoyance) of this option would be significant as heavy construction equipment (e.g., a drill rig and large bulldozer used for the site grading) would still operate near the property line and adjacent sensitive uses under this option. Also similar to the Project, the off-site construction vibration impacts (human annoyance) of this option due to heavy trucks traveling by sensitive receptors would be significant.

- Approach (c)—Reduced Development: This approach would reduce 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. However, similar to the Approach (a), reducing the number of construction equipment (even by up to 50 percent) would not reduce construction noise to a less than significant level. Furthermore, due to the close proximity of the sensitive receptors and a constrained Project Site that 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, especially at receptor locations R1, R2 and R6 (adjacent to the Project Site). In addition, the on-site construction vibration impacts (human annoyance) of this option would remain significant since 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. Off-site

construction vibration impacts (human annoyance), due to heavy trucks traveling by sensitive receptors, would also be significant, similar to the Project.

As discussed, none of the above approaches would substantially reduce or avoid the significant unavoidable construction-related on-site noise and both on-site and off-site vibration (human annoyance) impacts of the Project. This is because the significant unavoidable construction-related noise and vibration impacts of the Project, which is infill development in an urban area, are heavily influenced by the close proximity of the Project Site and the proposed haul route to existing noise- and vibration-sensitive uses rather than the amount or duration of Project construction activities. Furthermore, Approach (a) would cost substantially more to construct than the proposed Project given the extended construction period; Approach (b) would not be feasible due the site area constrained for the development; and Approach (c) would not be practical to reduce the amount of construction equipment or create a buffer zone. Therefore, an alternative that includes one or more of these approaches would not substantially reduce or eliminate the significant noise and vibration impacts of the Project and thus no further consideration of these approaches in the EIR is required.

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.[1] 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 (with the exception of Alternative 1) 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:

[1] *State of California, CEQA Guidelines Section 15126.6 (c).*

- 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-8. As evaluated in the Initial Study prepared for the Project included in Appendix A of this Draft EIR, and Section VI, Other CEQA Considerations, of this Draft EIR, the Project would not result in significant impacts related to aesthetics (scenic vistas, scenic resources within a scenic highway, and light and glare), air quality (odors), agriculture and forestry resources, biological resources, cultural resources, hazards and hazardous materials, hydrology/water quality, geology and soils, land use (division of an established community), noise (airport related noise), mineral resources, population and housing (unplanned population growth), public services (schools, libraries, parks and recreation), solid waste and wildfires. Therefore, no further analysis of these topics in this EIR is required or provided.

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: Commercial/Residential Alternative	Alternative 3: Senior Residential Alternative
A. AESTHETICS				
Conflict with Applicable Regulations Governing Scenic Quality	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
B. AIR QUALITY				
Regional Emissions				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)
Localized Emissions				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contaminants				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
C. ENERGY				
Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources				
Construction	Less Than Significant	Less (No Impact)	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: Commercial/Residential Alternative	Alternative 3: Senior Residential Alternative
Operation	Less Than Significant	Greater (Less than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
D. GREENHOUSE GAS EMISSIONS				
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)
E. LAND USE AND PLANNING				
Conflict with Land Use Plans	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Greater (Less Than Significant)
F. NOISE				
Construction[a]				
On-site Noise	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Off-site Noise	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
On-site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
On-site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Off-site Vibration (Building Damage)	Less Than Significant	Less (No Impact)	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: Commercial/Residential Alternative	Alternative 3: Senior Residential Alternative
Off-site Vibration (Human Annoyance)	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Similar (Significant and Unavoidable)
Operation				
On-site Noise	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Similar (Less Than Significant)
Off-site Noise	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Less (Less Than Significant)
G. POPULATION AND HOUSING				
Displace Substantial Numbers of Existing People or Housing	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Similar (Less Than Significant)
H. PUBLIC SERVICES				
Fire Protection				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Police Protection				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
I. TRANSPORTATION				
Conflict with Plans	Less Than Significant	Less (No Impact)	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: Commercial/Residential Alternative	Alternative 3: Senior Residential Alternative
Vehicle Miles Travelled	No Impact	Less (No Impact)	Greater (Less Than Significant)	Similar (No Impact)
Emergency Access	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
J. TRIBAL CULTURAL RESOURCES				
Tribal Cultural Resources	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
K. UTILITIES AND SERVICE SYSTEMS				
Water Supply and Infrastructure				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Wastewater				
Construction	Less Than Significant	Less (No Impact)	Similar (Less Than Significant)	Similar (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Energy Infrastructure				
Construction	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)
Operation	Less Than Significant	Less (No Impact)	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: Commercial/Residential Alternative	Alternative 3: Senior Residential Alternative

[a] *Cumulative on- and off-site noise impacts and cumulative off-site vibration impacts with respect to human annoyance during Project construction would be significant and unavoidable.*

Source: Eyestone Environmental, 2021.

5. Project Objectives

CEQA Guidelines Section 15124(b) states that the project description shall contain "a statement of the objectives sought by the proposed project." Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." As discussed in Section II of this Draft EIR, the underlying purpose of the Project is to provide a senior residential housing community that meets the needs of an increasingly aging population in the City by providing variety in housing together with integrated services. The Project's basic and fundamental objectives are provided below.

- Promote adequate housing that is accessible to senior citizens by providing a new senior-only housing residential community that meets the daily living needs of the City's aging adult population, including recreational and social needs on-site, advancing the West Los Angeles Community Plan Objective 1-4 and supporting General Plan (Housing Element) Objective 1.1 to provide housing to meet current and projected needs.

- Develop senior-independent units, assisted living guest rooms, and memory care guest rooms to help meet the specific housing needs of the City's aging population, consistent with General Plan (Housing Element) Objective 1.1, and Policy 1.1.3, and West Los Angeles Community Plan Objective 1-1 to construct a range of different housing types that address the diverse needs of the City's existing residents and projected population.

- Locate senior citizen housing within reasonable walking distance of health and community facilities, services and public transportation by integrating supporting services with the senior housing units in one building, supporting the West Los Angeles Community Plan Policy 1-2.2.

- Provide a range of on-site recreational, health, wellness and dining activities and services to support the daily needs of seniors and promote safety and health consistent with General Plan (Housing Element) Objective 2.1.

- Unify the Project Site to maximize efficient use of the site and associated parcels and orient development to and respond to the low- to mid-scale character of surrounding land uses while maintaining adequate public circulation.

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. Section 15126.6(e)(3)(B) of the CEQA Guidelines states in part that, "in certain instances, the No Project Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, Alternative 1, the No Project/No Build Alternative, assumes that the 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 is currently developed with several multi-family residential buildings and associated structures and parking, and includes the portion of Bellwood Avenue that bisects the Project Site. Under Alternative 1, no new construction would occur.

2. Environmental Impacts

a. Aesthetics

No construction activities would occur under Alternative 1 and the existing buildings would remain. Therefore, Alternative 1 would have no potential to conflict with applicable zoning and other regulations governing scenic quality. No impacts would occur compared to the less-than-significant impacts of the Project.

b. Air Quality

(1) Regional Emissions

(a) Construction

Alternative 1 would not remove the existing multi-family residential developments 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. Therefore, no construction-related regional air quality impacts

would occur. Thus, impacts related to regional air quality emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 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 uses. Therefore, no operational air quality impacts associated with regional emissions would occur under Alternative 1. Thus, impacts related to regional air quality emissions during operation would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(2) Localized Emissions

(a) Construction

As previously discussed, 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. Therefore, construction-related localized air quality impacts would not occur. Thus, impacts related to localized air quality emissions during construction would be less under Alternative 1 when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 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 uses. Therefore, no operational air quality impacts associated with localized emissions would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

Since construction activities would not occur on the Project Site, Alternative 1 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 Alternative 1 would be less than the less-than-significant impacts of the Project.

(b) Operation

Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). Since Alternative 1 would not result in any new development on the Project Site, no increase in any potential sources of TAC emissions would occur. Therefore, no operational impacts associated with TACs would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(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 energy during construction that could result in the wasteful, inefficient, or unnecessary consumption of energy resources. Thus, no construction-related impacts to energy would occur. As such, construction-related 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 energy demand on the Project Site and would have no potential to result in the wasteful, inefficient, or unnecessary consumption of energy resources associated with new development. It is noted however that the Project would replace existing older buildings with modern buildings incorporating the latest City Green Building Code requirements, thereby improving the energy efficiency of buildings. As such, impacts under Alternative 1 would be less than significant, but greater when compared to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

The No Project/No Build Alternative would not involve any new development. As such, Alternative 1 would not have the potential to conflict with plans for renewable energy or energy efficiency. No impacts related to renewable energy or energy efficiency plans 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 beyond what is currently generated by the existing multi-family residential developments on the Project Site would be generated under Alternative 1. As such, no impacts associated with GHG emissions under the No Project/No Build would occur, and impacts would be less when compared to the less-than-significant impacts of the Project.

e. Land Use and Planning

Under the No Project/No Build Alternative, there would be no changes to the physical or operational characteristics within the Project Site. Thus, 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) Noise

(a) Construction

No new construction activities would occur under the No Project/No Build Alternative. Therefore, no construction-related noise would be generated on-site or off-site. As such, no on-site or off-site noise impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project. Specifically, the No Project/No Build Alternative would avoid the Project's significant and unavoidable impacts with respect to on-site noise sources during construction.

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new stationary or mobile noise sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site and off-site noise would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

(2) Vibration

(a) Construction

No new construction activities would occur under the No Project Alternative. Therefore, no construction-related vibration would be generated on-site or off-site under

Alternative 1. As such, no on-site or off-site vibration impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project, which would be less than significant for on-site construction vibration (building damage), significant and unavoidable for on-site construction vibration (human annoyance), less than significant for off-site construction vibration (building damage), and significant and unavoidable for off-site construction vibration (human annoyance).

(b) Operation

Alternative 1 would not develop new uses on the Project Site, and no changes to existing site operations would occur. Thus, no new on-site or off-site vibration sources would be introduced to the Project Site or the vicinity of the Project Site. As such, no impacts associated with operational on-site and off-site vibration would occur under Alternative 1, and such impacts would be less than the less-than-significant impacts of the Project.

g. Population and Housing

No changes to existing land uses or site operations would occur under Alternative 1. Alternative 1 would not result in the removal of the existing multi-family residential buildings or displacement of existing residents. Therefore, no population impacts would occur under Alternative 1 and impacts would be less when compared to the less-than-significant impacts of the Project.

h. Public Services

(1) Fire Protection

(a) Construction

As Alternative 1 would not require construction, it would not result in construction-related demand for Los Angeles Fire Department (LAFD) fire protection facilities or services, construction traffic that could potentially slow emergency response times, or the potential for construction-related obstruction of emergency access. Thus, no construction-related fire protection impacts would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or 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 LAFD stations that serve the Project

Site. No impacts to fire protection facilities would occur under Alternative 1, and impacts would be less when compared to the less-than-significant impacts of the Project.

(2) Police Protection

(a) Construction

As Alternative 1 would not require construction, it would not result in construction-related demand for police protection facilities or services from the Los Angeles Police Department (LAPD), construction traffic that could potentially slow emergency response times, or the potential for construction-related obstruction of emergency access. Therefore, Alternative 1 would not result in any police protection impacts due to construction, and impacts would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

No changes to existing land uses or operations on-site would occur under Alternative 1. Therefore, there would be no potential to increase the service population on-site and associated level of activity that could increase calls for police protection services from the LAPD. 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.

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); 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 under Alternative 1, and impacts would be less when compared to those of the Project, which would be less than significant.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

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

(b) Operation

Alternative 1 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 or fire flow water demand within the Project Site. No operational impacts to water supply and water infrastructure would occur under Alternative 1, 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 Alternative 1. Therefore, Alternative 1 would not generate wastewater during construction and no construction-related impacts to wastewater conveyance and treatment infrastructure would occur. As such, impacts related to wastewater would be less when compared to the less-than-significant impacts of the Project.

(b) Operation

Alternative 1 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 Alternative 1, and impacts would be less when compared to the impacts of the Project, which would be less than significant.

(3) Energy 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 energy during

construction, and no construction-related impacts to 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 long-term energy demand from the Project Site. No operational impacts related to energy 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.

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- and off-site construction vibration impacts with respect to human annoyance. Furthermore, the No Project/No Build Alternative would avoid the Project's cumulative on- and off-site construction noise impacts, as well as the Project's cumulative off-site construction vibration impacts related to human annoyance. Impacts associated with the remaining environmental issues would be less than or similar to those of the Project with the exception of impacts associated with the efficient use of energy during operation, which would be less than significant, but greater than the Project.

4. Relationship of the Alternative to Project Objectives

Under the No Project/No Build Alternative, the existing multi-family residential buildings and surface 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 underlying purpose of the Project to provide a senior residential housing community that meets the needs of an increasingly aging population in the City by providing variety in housing together with integrated services. In addition, Alternative 1 would not meet the following Project objectives:

- Promote adequate housing that is accessible to senior citizens by providing a new senior-only housing residential community that meets the daily living needs of the City's aging adult population, including recreational and social needs on-site, advancing the West Los Angeles Community Plan Objective 1-4 and supporting General Plan (Housing Element) Objective 1.1 to provide housing to meet current and projected needs.

- Develop senior-independent units, assisted living guest rooms, and memory care guest rooms to help meet the specific housing needs of the City's aging population, consistent with General Plan (Housing Element) Objective 1.1, and Policy 1.1.3, and West Los Angeles Community Plan Objective 1-1 to construct a range of different housing types that address the diverse needs of the City's existing residents and projected population.

- Locate senior citizen housing within reasonable walking distance of health and community facilities, services and public transportation by integrating supporting services with the senior housing units in one building, supporting the West Los Angeles Community Plan Policy 1-2.2.

- Provide a range of on-site recreational, health, wellness and dining activities and services to support the daily needs of seniors and promote safety and health consistent with General Plan (Housing Element) Objective 2.1.

- Unify the Project Site to maximize efficient use of the site and associated parcels and orient development to and respond to the low- to mid-scale character of surrounding land uses while maintaining adequate public circulation.

V. Alternatives

B. Alternative 2: Commercial/Residential Alternative

1. Description of the Alternative

In accordance with CEQA Guidelines Section 15126.6(e)(3)(B), "if the project is other than a land use or regulatory plan, for example a development project on an identifiable property, the "no project" alternative is the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project were approved. If disapproval of the project under consideration would result in actions by others, such as the proposal of some other project, this "no project" consequence should be discussed… and the analysis should identify the practical result of the project's non-approval…" CEQA Guidelines Section 15126.6(e)(3)(C) further states that the No Project Alternative should project "what would reasonably be expected to occur in the foreseeable future if the project were not approved based on current plans and consistent with available infrastructure and community services." The Project Site includes existing buildings that were constructed between approximately 1940 to 1951 on a development parcel located within an urbanized area with existing infrastructure and immediate proximity to mass transit. Based on this guidance, under Alternative 2, the Project Site would be developed in accordance with the parameters set forth by the existing zoning designations for the Project Site, which are R3-1-O (Multiple Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling).

Land uses permitted within the R3 designation include a wide variety of residential uses, including group dwellings, multiple dwellings, apartment houses, boarding houses, rooming houses, accessory uses and home occupations, senior independent housing, and assisted living care housing. Land Uses permitted within the C2 designation include a wide variety of uses, including, but not limited to, eldercare facilities, multiple dwellings, various retail and restaurant spaces, auditoriums, automotive fueling and service stations, churches, drive-in businesses, hospitals, sanitariums, clinics, and schools. As discussed in Section II, Project Description, of this Draft EIR, Height District 1 within the R3 Zone limits the height to 45 feet and the FAR to 3:1. Height District 1VL within the C2 Zone limits the height to 45 feet and three stories (except that there is no restriction on the number of stories for buildings used entirely for residential purposes) and the FAR to 1.5:1.

Based on the existing land use and zoning of the Project Site described above, Alternative 2 would develop approximately 111,591 square feet of multi-family residential uses with 60 new residential units, 21,257 square feet of retail uses, and 21,257 square feet of office uses. The new residential units under Alternative 2 would not be designated as senior housing units. Under Alternative 2, the portion of Bellwood Avenue that bisects the Project Site would remain a public street in its current alignment. A conceptual site plan of Alternative 2 is provided in Figure V-1 on page V-25.

As with the Project, the three existing multi-family residential developments with a total of 43,939 square feet, including 112 residential units, would be removed to accommodate Alternative 2. The proposed uses would be built within two two-story structures ranging in height from 25 feet to 35 feet for retail/office uses, and one four-story structure, 45 feet in height, for residential uses. With regard to vehicular parking, Alternative 2 would provide a total of 247 parking spaces. These parking spaces would be provided within one subterranean parking level under the residential apartment building and two subterranean parking levels under the retail/office buildings that would extend to a maximum depth of 22 feet (a reduction of eight feet in the depth of grading and an overall reduction in grading compared to the Project). As with the Project, Alternative 2 would provide a variety of open space consistent with the proposed residential uses. Specifically, in accordance with the LAMC, Alternative 2 would provide for approximately 10,500 square feet of open space. Overall, Alternative 2 would construct approximately 154,105 square feet of new floor area compared to the Project's 241,754 square feet of new floor area and would result in a floor area ratio of 1.5:1 on the C2-zoned parcels and 3:1 on the R3-zoned parcels.

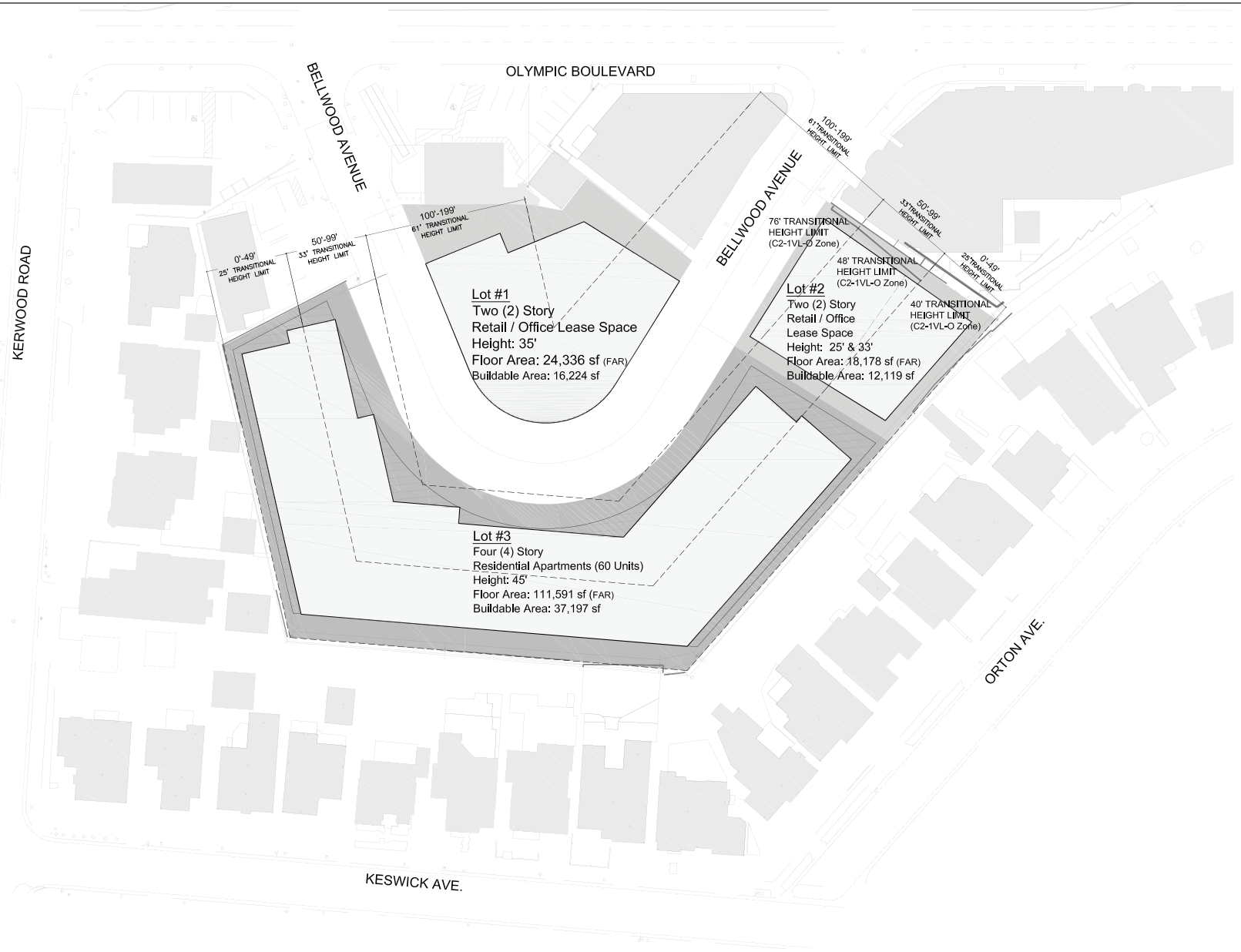

Figure V-1
Alternative 2 Conceptual Site Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2021.

2. Environmental Impacts

a. Aesthetics

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project, including the City of Los Angeles General Plan Framework Element (Framework Element), Los Angeles General Plan Conservation Element (Conservation Element), the West Los Angeles Community Plan (Community Plan), the Citywide Urban Design Guidelines, and the Los Angeles Municipal Code (LAMC). As described above, the Commercial/Residential Alternative would develop the Project Site in accordance with the parameters set forth by the existing zoning designations for the Project Site. As previously discussed, Alternative 2 would replace the existing uses on-site with 60 new residential units, 21,257 square feet of retail uses, and 21,257 square feet of office uses. The residential, retail, and office uses proposed would complement the uses surrounding the Project Site and would be designed consistent with relevant plans related to scenic quality, including promoting pedestrian activity and further activating the streets in the vicinity of the Project Site. Similar to the Project, Alternative 2 would also include new buildings designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area, also consistent with relevant plans related to scenic quality. Overall, similar to the Project, Alternative 2 also would not conflict with the zoning and other regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. Thus, impacts would be less than significant and similar to those of the Project.

b. Air Quality

(1) Regional Emissions

(a) Construction

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.B, 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, construction activity would be reduced in comparison to the Project due to the reduction in overall development. 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 less than significant impacts of the Project. Therefore, as with the Project, Alternative 2 would result in less than significant impacts, and impacts would be similar to those of the Project.

(b) Operation

As previously discussed, the development proposed under Alternative 2 would be reduced compared to the Project. However, based on the proposed uses, the number of net daily trips generated by Alternative 2 would be greater than the number of new daily trips generated by the Project. Specifically, as provided in Appendix H of this Draft EIR, Alternative 2 would result in a total of 638 net new daily vehicle trips, which would be comparatively greater than the Project's net reduction of 75 daily trips. Thus, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips and daily VMT to the Project Site, which are the largest contributors to operational air pollutant emissions, and by the consumption of natural gas.[2]

Despite the reduction in uses and overall floor area, the overall pollutant emissions generated by Alternative 2 would be greater than the emissions generated by the Project due to the increase in the number of daily vehicle trips. Overall, impacts associated with regional air pollutant emissions during operation of Alternative 2 would be less than significant and greater than the impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 2 would be located at similar distances from sensitive receptors as the Project. Although Alternative 2 would result in a reduction in the amount of proposed development compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to the less than significant impacts of the Project. Therefore, as with the Project, localized impacts under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

[2] *It should be noted that criteria pollutant emissions are not calculated for electricity usage, consistent with SCAQMD and CalEEMod methodology. Criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered to be the maximum feasible level of mitigation for power plant emissions.*

(b) Operation

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes and on-site area and stationary sources. As provided in Appendix H of this Draft EIR, Alternative 2 would generate a total of 11 net new vehicle trips during the A.M. peak hour and 33 net new trips during the P.M. peak hour. This alternative would generate more peak-hour trips compared to the Project's net reduction of 16 A.M. peak-hour trips and 9 P.M. peak-hour trips. As such, total peak-hour vehicular emissions would be greater under Alternative 2 compared to the Project. However, the development proposed under Alternative 2 would be reduced compared to the Project; therefore, area and stationary sources would generate less on-site operational air emissions compared to the Project. With the increase in localized vehicle emissions and decrease in on-site emissions, overall localized air quality impacts under Alternative 2 would be similar to the Project. As such, under Alternative 2, total contributions to localized air pollutant emissions during operation would be similar to the Project's contribution. Accordingly, localized air quality impacts under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction TAC emissions generated by Alternative 2 would be less than to those of the Project since excavation activities required during construction of Alternative 2 would be reduced under this alternative. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 2 would be less than significant, and less than the impacts of the Project.

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter (DPM) from delivery trucks. Under Alternative 2, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be increased compared to the Project due to the increase in the number of trips generated. However, the number of delivery trucks under Alternative 2 would not result in a notable increase in TAC emissions compared to the Project. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating,

electrical manufacturing, and a petroleum refinery). Similar to the Project, the land uses proposed under Alternative 2 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 2 would not release substantial amounts of TACs. Impacts under Alternative 2 would be less than significant, and similar to the less-than-significant impacts of the Project.

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(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. Like the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 2 would be reduced compared to the Project due to the reduction in overall construction activities. As with the Project, construction equipment used during construction of Alternative 2 would comply with Title 24 requirements where applicable, CARB's anti-idling regulations, as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Alternative 2 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Specifically, like the Project, Alternative 2 would implement AQ-PDF-1 which would require the use of electricity from power poles rather than temporary gasoline or diesel powered generators where available. Therefore, as with the Project, Alternative 2 construction activities would require energy demand that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 2 and less than the less-than-significant impacts due to the reduction in construction activities and duration.

(b) 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. As previously discussed, Alternative 2 would develop 60 residential units, 21,257 square feet of retail uses, and 21,257 square feet of office uses. As previously noted, the number of daily trips under Alternative 2 would be greater when compared to the Project. As such, transportation fuel usage under Alternative 2 would be greater in comparison to the Project. However, with the reduced square footage under Alternative 2,

the consumption of electricity and natural gas would be less than the Project. With the increase in transportation fuel usage and decrease in on-site electricity and natural gas consumption, overall energy usage under Alternative 2 would be similar to the Project. As with the Project, Alternative 2 would implement design features to reduce energy usage. Specifically, like the Project, Alternative 2 would implement GHG-PDF-1 as set forth in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would incorporate sustainability features (e.g., Energy Star–labeled products); incorporate water conservation features, such as drip/subsurface irrigation; and use LED lighting, which would reduce electricity used for lighting purposes compared to non-LED lighting. In addition, Alternative 2 would also incorporate GHG-PDF-2, which limits the number of natural gas-fueled fireplaces; therefore, reducing GHG emissions resulting from natural gas combustion. 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. Overall, impacts related to energy use during operation of Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, Alternative 2 would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation related energy usage, Alternative 2 would also comply with goals of the Southern California Association of Governments' (SCAG) 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and 2020–2045 RTP/SCS, which incorporates VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 2 and their proximity to public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during Project operations would comply with Corporate Average Fuel Economy (CAFE) standards. As with the Project, Alternative 2 would be required to comply with California Air Resources Board (CARB) anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Therefore, based on the above, Alternative 2 would not conflict with plans for renewable energy or energy efficiency. Impacts related to renewable energy or energy efficiency plans would be less than significant under Alternative 2, and impacts would be similar to the less-than-significant impacts of the Project.

d. Greenhouse Gas Emissions

Greenhouse Gas Emissions (GHG) emissions from a development project are determined in large part by the number of daily trips generated and associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 2 would increase compared to the Project. However, with the reduction in square footage, Alternative 2 would also result in a reduction in energy and water consumption compared to the Project. Although Alternative 2 would result in a reduction in energy and water related GHG emissions, the increase in daily trips and VMT would result in greater overall GHG emissions in comparison to the Project. As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 2 would also incorporate 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 CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 2 would also be consistent with the GHG reduction goals and objectives included in adopted state (Scoping Plan), regional, and local regulatory plans. Alternative 2 would also benefit from proximity to mass transit and proximity to retail and commercial uses resulting in a similar reduction in VMT in comparison to a project without trip reducing features. With the reduction in VMT and compliance with green building measures, Alternative 2 would also be consistent with the VMT reduction goals of the RTP/SCS. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant. However, such impacts would be greater than the less-than-significant impacts of the Project.

e. Land Use

As previously described, Alternative 2 would develop the Project Site in accordance with the parameters set forth by the existing zoning designations for the Project Site, which are R3-1-O (Multiple Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling). As discussed above, Alternative 2 would develop 60 new residential units, 21,257 square feet of retail uses, and 21,257 square feet of office uses, consistent with the uses permitted by existing zoning. In accordance with existing zoning, the proposed buildings under Alternative 2 would range from 25 to 45 feet, or two to four stories. As previously discussed, Alternative 2 would also comply with the FAR of 1.5:1 on the C2-zoned parcels and 3:1 on the R3-zoned parcels. In addition, since Alternative 2 would comply with the permitted land use and existing zoning requirements for the Project Site and would also include new uses located in an urbanized area with new pedestrian amenities and with access to transit, this alternative would also not conflict with the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan, including the Framework Element, Los Angeles General Plan Housing Element (Housing

Element), Los Angeles Conservation Element, and Mobility Plan 2035; the West Los Angeles Community Plan; the Citywide Design Guidelines; and SCAG's 2016-2040 and 2020-2045 RTP/SCS. Thus, impacts related to consistency with land use plans would be less than significant and less than the less-than-significant impacts of the Project since Alternative 2 would require fewer discretionary actions.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 2 would be substantially similar to the Project, although the amount of construction activities and duration would be reduced due to the reduction in total floor area (from 241,754 sf to 154,105 sf) and the reduced amount of excavation associated with the subterranean parking levels. 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. Due to the close proximity of the sensitive receptors (i.e., directly adjacent the Project Site), it would not be feasible to mitigate the on-site construction noise impacts of the Project, especially at receptor locations R1, R2 and R6. In addition, on- and off-site construction activities and the associated construction noise levels under Alternative 2 would be expected to be similar to that of the Project during maximum activity days since the daily intensity of construction activities would be the same under Alternative 2, even though the overall amount and duration of construction would decrease when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 2 would be similar to those of the Project. As with the Project, Alternative 2 would implement Project Design Features NOI-PDF-1 (requiring muffling of power construction equipment) and NOI-PDF-4 (prohibiting use of impact piles, and distance limits for heavy construction equipment), and Mitigation Measure NOI-MM-1 (requiring temporary sound barriers) to reduce noise levels during construction. Similar to the Project, on-site construction noise would be significant and unavoidable under Alternative 2 even with the application of project design features and mitigation measures. In addition, cumulative on- and off-site noise impacts during Alternative 2 construction would be significant and unavoidable, similar to the Project. Overall, construction noise impacts under Alternative 2 would be similar to those of the Project.

(b) 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 mechanical

equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash collection areas; 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 and uses, the noise levels from building mechanical equipment , and outdoor spaces, would be reduced. While loading operations would increase with the office/retail use, the noise levels associated with the loading operation would be similar to the Project (i.e., it Is expected that one delivery truck at a time would occur). In addition, similar to the Project, Alternative 2 would include Project Design Features NOI-PDF-2, -3, and -5 that require screening of outdoor mounted mechanical equipment and loading docks and specify sound levels for outdoor sound systems, if any. Although Alternative 2 would include more parking spaces than the Project (247 versus 140 parking spaces), noise levels associated with parking operation would be similar, as the parking spaces are within the enclosed subterranean levels. Thus, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project due to reduction in total floor area and uses proposed.

With regard to off-site noise sources, Alternative 2 would result in an increase in daily vehicle trips compared to the Project. Specifically, Alternative 2 would result in an increase of 638 daily vehicle trips, as compared to a reduction of 75 daily vehicle trips under the Project. The increase in vehicle trips would result in an increase in off-site traffic-related noise levels under Alternative 2.[3] Typically, a doubling of traffic volumes would result in an increase of 3 dBA. However, when taking into account the existing volumes on the roadway, Alternative 2 traffic would result in an increase of approximately 1.4 percent and 1.2 percent in the daily traffic along Olympic Boulevard and Kerwood Avenue (the two roadway segments nearest to the Project Site), respectively.[4] The increase in the traffic volumes would result in a maximum noise increase 0.1 dBA along Olympic Boulevard and Kerwood Avenue.[5] The estimated noise level increase along Olympic Boulevard under Alternative 2 would be well below the 3-dBA significance criteria applicable when noise levels falls within the normally unacceptable land use category (between 70 dBA and 75 dBA CNEL). Similarly, the estimated noise level increase along Kerwood Avenue would be well below the 5 dBA Community Noise Equivalent Level (CNEL) significance threshold applicable when noise levels fall within the conditionally acceptable land use category (between 60 dBA and 70 dBA CNEL). Therefore, off-site noise impacts under Alternative 2

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[3] *Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

[4] *Detailed calculations are provided in Appendix F.*

[5] *Traffic noise level increase in decibel is calculated based on logarithmic basic. 0.1 dBA increase = 10*log(1.014)*

would be greater than those of the Project due to the increase in vehicle trips; however, impacts would remain less than significant as for the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although the amount and duration of construction activities would be slightly reduced. As with the Project, construction of the Commercial/Residential Alternative would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 2 would similarly be less than significant for on-site and off-site construction vibration (building damage) and significant and unavoidable for on-site and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 2 would be similar to the impacts of the Project.

(b) Operation

As described in Section IV.F, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 2. As with the Project, vehicular-induced vibration from Alternative 2, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 2 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 2 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 2 would be less than significant and similar to the Project.

g. Population and Housing

Alternative 2 would be constructed within the same Project Site as the Project. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently

developed with three multi-family residential developments comprising a total of 43,939 square feet with a total of 112 units. The majority of the existing housing units are studio units, and the existing units range in size from approximately 275 to 375 square feet. Similar to the Project, the removal of the existing residential units under Alternative 2 would be subject to the requirements of the City's Rent Stabilization Ordinance (RSO) and Ellis Act. As previously described, Alternative 2 would construct approximately 111,591 square feet of residential uses with 60 new residential units.[6] While the proposed housing units would not increase the overall availability of housing units on-site, the size of residential development and type of units would increase, thus the number of bedrooms and overall total number of residents may be similar to the existing uses.[7] With compliance with the relocation assistance requirements of the RSO and Ellis Act, the displacement of people and existing housing units would not be considered substantial requiring the construction of replacement housing elsewhere. Impacts with regard to displacing a substantial number of existing people or housing would be less than significant and greater than the less-than-significant impacts of the Project due to the decreased availability of housing units for residents on-site under Alternative 2.[8]

h. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the types of construction activities required for Alternative 2 would be similar to that of the Project. However, the overall amount and duration of construction activities would be reduced compared to the Project due to the reduction in development. In addition, like the Project, 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 and the associated potential need for fire protection services.

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[6] *Unlike the Project, the housing units would not be in an eldercare facility providing senior community care services.*

[7] *Using the household size of 2.25 from the City's VMT calculator, Alternative 2 would generate approximately 135 residents. The 112 existing housing units are predominantly studio units and thus would be expected to have a household size of one person per unit. As such, Alternative 2 would be expected to result in an increase of approximately 23 residents within the Project Site when compared with existing conditions.*

[8] *The Project is anticipated to generate 231 residents when compared with the 135 residents generated by Alternative 2 and would provide a greater amount of overall housing units on the Project Site as compared to Alternative 2.*

Similar to the Project, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Also similar to the Project, Alternative 2 would be required to implement Project Design Feature TR-PDF-1, which would require a Construction Management Plan to ensure that adequate and safe access is available within and near the Project Site during construction activities.

Construction activities would also 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. However, Alternative 2 would implement a similar design feature in order to allow the majority of construction-related traffic, including hauling activities and construction worker trips, to occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. In addition, as mentioned above, a Construction 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 activities would not result in the need for new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 2 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

Alternative 2 would generate a new residential population, as well as a new visitor and employee population on the Project Site that would contribute to an increase in demand for LAFD fire protection and emergency medical services. Specifically, Alternative 2 would generate approximately 135 new residents.[9] As such, Alternative 2 would result in a lower residential service population when compared to the 231 new residents generated by the Project.[10] In addition, Alternative 2 would provide for 21,257 square feet of retail uses and 21,257 square feet of office uses, which would generate approximately 128 employees.[11] As such, Alternative 2 would result in a greater employee service population

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[9] *Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

[10] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.1.*

[11] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 21,257 square feet of retail uses and the rate 0.004 employee per square foot for "General Office" land use is applied to the 21,257 square feet of office uses. Gibson Transportation Consulting, Inc., "Transportation Analysis of Project*

(Footnote continued on next page)

when compared to the 88 employees generated by the Project.[12] While Alternative 2 would increase the existing service population compared to existing conditions, the overall increased demand would be less than Project due to the lower service population. As such, the overall increased demand for LAFD fire protection and emergency medical services would be reduced compared to that of 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. Similar to the Project, Alternative 2 would comply with the City's applicable emergency access requirements set forth by the Los Angeles Department of Building and Safety and LAFD. Alternative 2 would also not include the installation of barriers that could impede emergency vehicle access. As with the Project, the Los Angeles Department of Water and Power (LADWP) would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 2. Therefore, similar to the Project, impacts with regard to LAFD fire protection during operation of Alternative 2 would be less than significant and would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Operation of Alternative 2 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in development and reduced service population.

(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 amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Alternative 2 would also implement similar design features as the Project. Specifically, pursuant to Project Design Feature POL-PDF-1, Alternative 2 would be required to provide temporary security measures such as security fencing, lighting, and locked entry to secure the Project Site during construction, thereby reducing the demand for police protection services.

Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.

[12] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.1.*

In addition, similar to the Project, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Also, similar to the Project, Alternative 2 would be required to implement Project Design Feature TR-PDF-1, which would require a Construction Management Plan 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 due to the reduction in construction activities and duration.

(b) Operation

Alternative 2 would generate a new residential population as well as a new visitor and employee population on the Project Site that would contribute to an increased demand for police services. Specifically, Alternative 2 would generate approximately 135 new residents.[13] As such, Alternative 2 would result in a lower residential service population when compared to the 231 new residents generated by the Project.[14] In addition, Alternative 2 would provide for 21,257 square feet of retail uses and 21,257 square feet of office uses, which would generate approximately 128 employees.[15] As such, Alternative 2 would result in a greater employee service population when compared to the 88 employees generated by the Project.[16] Nevertheless, as discussed in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the LAPD considers the residential population within their service area to evaluate service capacity. As such, while Alternative 2 would increase the existing police service population of the West Los Angeles Area compared to existing conditions, the increase would be less than the Project due to the lower residential service population. Like the Project, Alternative 2 would implement similar design features as the Project. Pursuant to Project Design Feature POL-PDF-2 through Project Design Feature POL-PDF-5, this alternative would be required to provide a closed-circuit security camera system; keycard entry for the buildings and parking areas; and appropriate lighting to ensure security. The design features would help offset the increase in demand for police

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[13] *Based on City of Los Angeles VMT Calculator Documentation (Version 1.3), May 2020, Table 1: Land Use and Trip Generation Base Assumptions. Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

[14] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.1.*

[15] *Based on the City of Los Angeles VMT Calculator Documentation Guide, Table 1, May 2020, the rate 0.002 employee per square foot for "General Retail" land use is applied to the 21,257 square feet of retail uses and the rate 0.004 employee per square foot for "General Office" land use is applied to the 21,257 square feet of office uses. Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

[16] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.1.*

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. As such, the impact on police protection services under Alternative 2 would be less than significant, and less than the less-than-significant impacts of the Project.

i. Transportation

As discussed above, Alternative 2 would be developed within the same Project Site as the Project, though the portion of Bellwood Avenue that bisects the Project Site would remain in its existing alignment. Consistent with the Project, Alternative 2 would be designed to generally conform with the applicable programs, plans, ordinances, or policies regarding the circulation system including those set forth in the Mobility Plan; Citywide Design Guideline 2; Plan for a Healthy Los Angeles; and the LAMC. Additionally, Alternative 2 would not preclude the City from implementing future improvements to serve the long-term mobility needs of the City. Furthermore, as discussed further below, impacts with respect to VMT would be less than significant, similar to the Project. Therefore, impacts associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be similar to the Project's less than significant impacts.

When accounting for the same project design features as the Project, Alternative 2 would result in a greater daily VMT when compared to the Project. Specifically, as shown in Appendix H of this Draft EIR, Alternative 2 would result in 5,631 total net daily VMT, which would be comparatively greater than the 39 net daily VMT generated by the Project.[17] Based on the population assumptions, this Alternative would generate an average household VMT of 4.8 per capita and an average work VMT per employee of 9.1.[18] The average household VMT per capita for Alternative 2 would still fall below the significance threshold of household VMT of 7.4 and the average work VMT per employee of 11.1 for the West Los Angeles Area Planning Commission area. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be less-than-significant and greater than the impacts of the Project.

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[17] *Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

[18] *Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

Alternative 2 would reduce the number of driveways compared to existing conditions. Specifically, access to the Project Site would be provided via four driveways along Bellwood Avenue. Similar to the Project, driveways under Alternative 2 would be designed, placed, and configured in accordance with LADOT's *Manual of Polices and Procedures* to limit vehicle queue and bicycle/pedestrian-vehicle conflicts. In addition, the driveways would be designed and located at a distance from Olympic Boulevard to limit queue spillovers into the public right-of-way (ROW) and reduce interruptions to pedestrian/bicycle flow and safety. Therefore, similar to the Project, impacts would be less than significant. Lastly, similar to the Project, construction activities under Alternative 2 could potentially impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Although Alternative 2 would not involve the vacation and realignment of Bellwood Avenue as proposed under the Project, Alternative 2 may require infrastructure improvements or upgrades that could temporarily necessitate lane closures on nearby roadways. However, Alternative 2 would also be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and to ensure traffic flow is maintained on adjacent right-of-ways, as well as on the City-designated disaster route along Olympic Boulevard. With regard to operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not include the installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 2 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

j. Tribal Cultural Resources

As previously discussed, Alternative 2 would construct one to two subterranean parking levels that would extend to a maximum depth of 22 feet, a reduction of eight feet in the depth of grading as compared to the Project that would result in reduced overall excavation activities. Therefore, the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced compared to that of the Project. As discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, no known tribal cultural resources have been identified within the Project Site or within 0.5-mile of the Project Site. Nevertheless, Alternative 2 would also implement the City's standard condition of approval to address inadvertent discovery of tribal cultural resources. As such, like the Project, impacts to tribal cultural resources would be less than significant and less than the impacts

of the Project due to the reduction in excavation associated with subterranean parking levels.

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 only be slightly reduced with the reduction in construction activities and duration compared to the Project. 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 associated with Alternative 2 would be reduced, the temporary and intermittent demand for water during construction of Alternative 2 would similarly be expected to be met by the City's available water supplies.

As with the Project, Alternative 2 would require new on-site water distribution lines to serve the new buildings and uses and may require the upgrade of existing water lines. Similar to the Project, the connection and installation of water distribution lines would primarily involve trenching to place the lines below the surface. As with the Project, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines and to avoid existing water lines and disruption of water service. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would also be implemented as part of the Commercial/Residential Alternative to ensure adequate and safe access remains available within and near the Project Site during construction. Overall, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 2, and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on the reduction in total development as compared to the Project, water demand for Alternative 2 would be less than the Project's estimated increase in water demand. Specifically, as shown in Table V-2 on page V-42, when accounting for the removal of existing uses, Alternative 2 would result in a net reduction of 2,318 gallons per day (gpd) in water demand compared to the Project's 25,941 gpd water demand. Thus, as

Table V-2
Estimated Water Consumption/Wastewater Generation for Alternative 2

Land Use	Unit	Generation Factor[a]	Total Water Demand/ Wastewater Generation (gpd)
Existing			
Residential	112 du	150 gpd/1,000 sf	16,800
Subtotal			*16,800*
Proposed			
Residential	60 du	190 gpd/du	11,400
Retail	21,257 sf	25 gpd/1,000 sf	531
Office	21,257 sf	120 gpd/1,000 sf	2,551
Subtotal			*14,482*
Total Net Water Demand/ Wastewater Generation			**-2,318**

du = dwelling unit
gpd = gallons per day
sf = square feet
[a] *Sewage generation calculations are based on generation factors provided by City of Los Angeles Bureau of Sanitation (LASAN).*
Source: Eyestone Environmental, 2021.

with the Project, the estimated water demand under Alternative 2 would not exceed the available supplies projected to be available by LADWP. Specifically, the estimated 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. Furthermore, similar to the Project, Alternative 2 would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new buildings. 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

As with the Project, wastewater generation during construction of Alternative 2 would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from construction

activities under Alternative 2 is not anticipated to cause a measurable increase in wastewater flows.

As with the Project, Alternative 2 may require construction of on-site wastewater infrastructure to serve the new buildings, and potential limited extension/upgrade and/or relocation of existing adjacent public wastewater infrastructure. Similar to the Project, these construction activities would primarily be confined to trenching and would be limited to the on-site wastewater distribution as well as minor off-site work associated with connections to the public main. In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would also be implemented as part of Alternative 2 to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, similar to the Project, 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 with the Project, operation of Alternative 2 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total development as compared to the Project, wastewater generation under Alternative 2 would be less than the Project's estimated wastewater flow. Specifically, as shown in Table V-2 on page V-42, when accounting for the removal of existing uses, Alternative 2 would result in a net reduction of 2,318 gpd in wastewater when compared to the Project's 25,941 gpd wastewater flow. As provided in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the Hyperion Water Reclamation Plant (HWRP). Therefore, it is anticipated that the wastewater generated by Alternative 2 could also be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 2 would be provided by utilizing new on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that the wastewater flows generated by Alternative 2 would be less than the estimated wastewater flows of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to serve the wastewater flows of Alternative 2. Furthermore, all related sanitary sewer connections and on-site infrastructure under Alternative 2 would be designed and constructed in accordance with applicable standards.

Based on the above, 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

The energy consumed by Alternative 2 would be slightly reduced compared to the Project due to the reduced construction activities and duration. As LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site, the existing infrastructure would similarly have capacity to supply energy for Alternative 2. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project due to the reduced construction activities.

(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, based on the uses and the reduced amount of total floor area proposed under Alternative 2, the total energy consumption of Alternative 2 would be less than the total energy consumption of the Project. Therefore, impacts to infrastructure capacity 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 related to on-site noise during construction and to on-site and off-site vibration during construction (pursuant to the threshold for human annoyance). Cumulative impacts with respect to on-site and off-site noise during construction and with respect to vibration impacts associated with off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also remain significant and unavoidable. Additionally, Alternative 2 would result in greater impacts associated with air quality and GHG emissions, off-site mobile noise, housing displacement, and transportation (VMT) compared to the Project; however, these impacts would remain less than significant. Alternative 2 would reduce several of the less than significant impacts associated with the Project (e.g., the less than significant impacts associated with TACs during construction, energy efficiency during construction, land use consistency, on-site operational noise, tribal cultural resources, police and fire protection services, water and wastewater during operation, and energy infrastructure). All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 2 would develop 60 new multi-family residential units, 21,257 square feet of retail uses, and 21,257 square feet of office uses. Alternative 2 would not vacate and realign the portion of Bellwood Avenue that bisects the Project Site. The new residential units under Alternative 2 would not be designated senior housing units. As such, Alternative 2 would not meet the Project's underlying purpose to provide a senior residential housing community that meets the needs of an increasingly aging population in the City by providing variety in housing together with integrated services. Alternative 2 would also not meet the following Project objectives:

- Promote adequate housing that is accessible to senior citizens by providing a new senior-only housing residential community that meets the daily living needs of the City's aging adult population, including recreational and social needs on-site, advancing the West Los Angeles Community Plan Objective 1-4 and supporting General Plan (Housing Element) Objective 1.1 to provide housing to meet current and projected needs.

- Develop senior-independent units, assisted living guest rooms, and memory care guest rooms to help meet the specific housing needs of the City's aging population, consistent with General Plan (Housing Element) Objective 1.1, and Policy 1.1.3, and West Los Angeles Community Plan Objective 1-1 to construct a range of different housing types that address the diverse needs of the City's existing residents and projected population.

- Locate senior citizen housing within reasonable walking distance of health and community facilities, services and public transportation by integrating supporting services with the senior housing units in one building, supporting the West Los Angeles Community Plan Policy 1-2.2.

- Provide a range of on-site recreational, health, wellness and dining activities and services to support the daily needs of seniors and promote safety and health consistent with General Plan (Housing Element) Objective 2.1.

- Unify the Project Site to maximize efficient use of the site and associated parcels and orient development to and respond to the low- to mid-scale character of surrounding land uses while maintaining adequate public circulation.

V. Alternatives

C. Alternative 3: Senior Residential Alternative

1. Description of the Alternative

Alternative 3 would develop 130 senior residential units within the Project Site in accordance with the existing R3-1-O (Multiple Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling). The new residential units would be designated senior housing units but would not be in an eldercare facility or include integrated services or care. Under Alternative 3, the portion of Bellwood Avenue that bisects the Project Site would remain a public street in its current alignment. A conceptual site plan of Alternative 3 is provided in Figure V-2 on page V-47. As with the Project, the three existing multi-family residential developments comprising a total of 43,939 square feet and including 112 residential units would be removed to accommodate Alternative 3. The proposed senior residential units would be built within three primary structures ranging from three stories and 35 feet in height to four stories and 45 feet in height. With regard to vehicular parking, Alternative 3 would provide a total of 260 parking spaces. These parking spaces would be provided within one subterranean parking level under the larger four-story residential building and in one subterranean parking level and one at-grade parking level for the other residential buildings (with residential units provided above the ground floor parking level for each of those two buildings, which may also include common area or lobby space). The subterranean parking levels under Alternative 3 would extend to a maximum depth of 12 feet (a reduction in the depth of grading of approximately 18 feet with an overall reduction in grading when compared to the Project). As with the Project, Alternative 3 would provide a variety of open spaces for the proposed residential uses. Specifically, in accordance with the LAMC, Alternative 3 would provide for approximately 22,750 square feet of open space. Overall, this alternative would construct approximately 154,105 square feet of new floor area compared to the Project's 241,754 square feet of new floor area and would result in a floor area ratio of 1.5:1 on the C2-zoned parcels and 3:1 on the R3-zoned parcels.

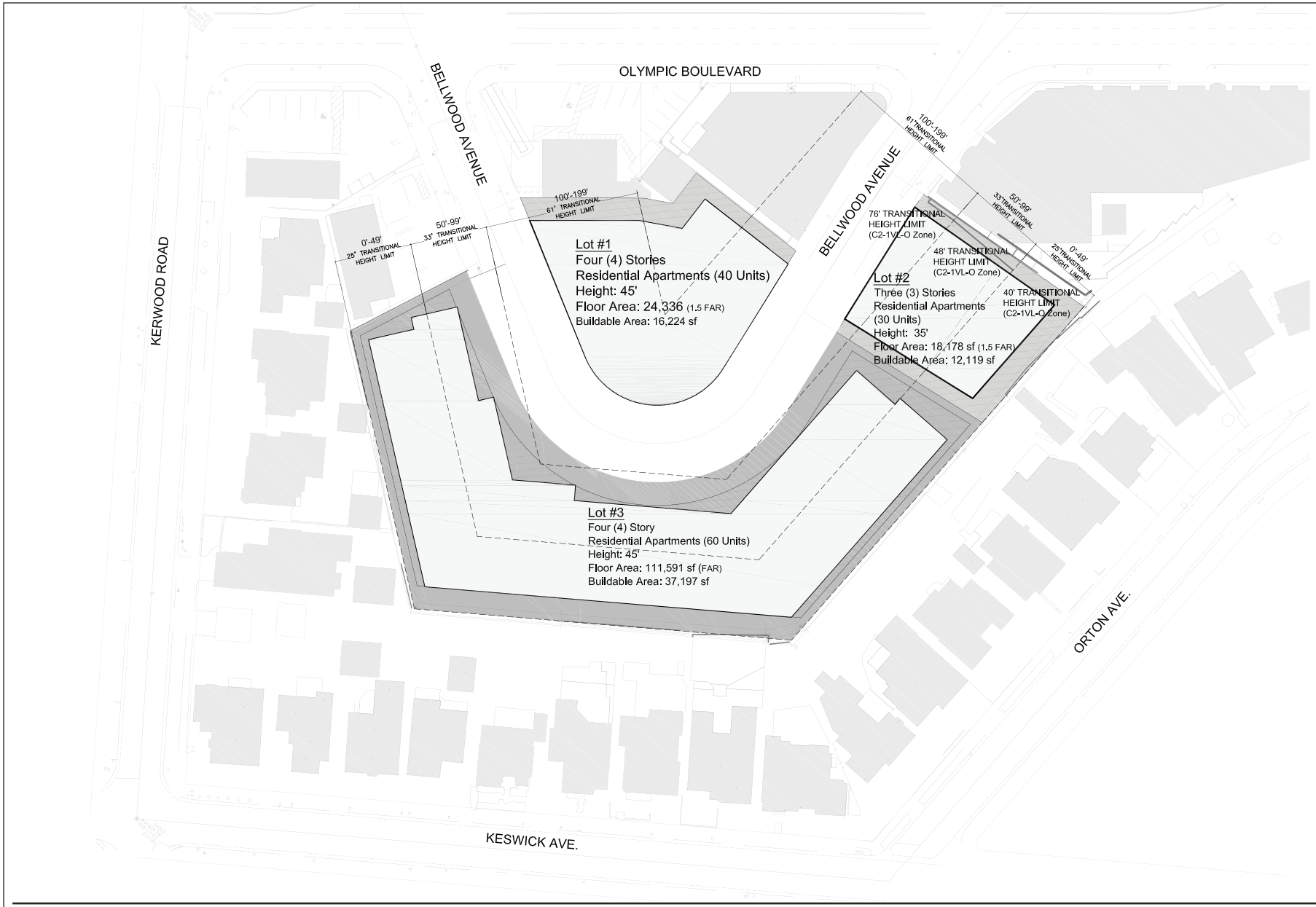

Figure V-2
Alternative 3 Conceptual Site Plan

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2021.

2. Environmental Impacts

a. Aesthetics

As discussed in Section IV.A, Aesthetics, of this Draft EIR, a number of local plans, policies, and regulations related to scenic quality are applicable to the Project Site, including the Framework Element, Conservation Element, the Community Plan, the Citywide Urban Design Guidelines, and the LAMC. As described above, the Senior Residential Alternative would develop the Project Site in accordance with the existing zoning designations of R3-1-O (Multiple Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling). As previously discussed, Alternative 3 would replace the existing uses on-site with 130 new senior residential units. Similar to the Project, Alternative 3 would complement the uses surrounding the Project Site and would be designed consistent with relevant plans related to scenic quality, including promoting pedestrian activity and further activating the streets in the vicinity of the Project Site by placing new residents in close proximity to nearby off-site retail. Similar to the building proposed under the Project, new buildings under Alternative 3 would be designed to complement the existing surrounding uses and respond to the low- to mid-scale character of the surrounding area, also consistent with relevant plans related to scenic quality. Overall, similar to the Project, Alternative 3 also would not conflict with the zoning and other regulations governing scenic quality detailed in Section IV.A, Aesthetics, of this Draft EIR. Thus, impacts would be less than significant and similar to those of the Project.

b. Air Quality

(1) Regional Emissions

(a) Construction

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.B, 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 activity would be reduced in comparison to the Project due to the reduction in overall development. 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 less than significant impacts of the Project. Therefore, as with the Project, Alternative 3 would result in less than significant impacts, and impacts would be similar to those of the Project.

(b) Operation

As previously discussed, the development proposed under Alternative 3 would be reduced compared to the Project. Based on the proposed uses, the number of net daily trips generated by Alternative 3 would be less than the number of daily trips generated by the Project. Specifically, as provided in Appendix H of this Draft EIR, Alternative 3 would result in a net reduction of 134 daily vehicle trips, which would be comparatively less than the Project's net reduction of 75 daily trips. Operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips and daily VMT to the Project Site, which are the largest contributors to operational air pollutant emissions, and by the consumption of natural gas.[19]

As Alternative 3 would result in less daily trips and VMT, with the reduction in uses and overall floor area, both area sources and stationary sources would result in reduced on-site operational air emissions associated with energy consumption compared to the Project. As a result, the overall pollutant emissions generated by Alternative 3 would be less than the emissions generated by the Project. Therefore, impacts associated with regional air pollutant emissions during operation of Alternative 3 would be less than significant and less than the less than significant impacts of the Project.

(2) Localized Emissions

(a) Construction

On-site construction activities under Alternative 3 would be located at similar distances from sensitive receptors as the Project. Although Alternative 3 would result in a reduction in the amount of proposed development compared to the Project, the intensity of construction activities would be similar on days with maximum construction activities. Because maximum daily conditions are used for measuring impact significance, localized impacts on these days would be similar to the less than significant impacts of the Project. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant, and similar to the less-than-significant impacts of the Project.

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[19] *It should be noted that criteria pollutant emissions are not calculated for electricity usage, consistent with SCAQMD and CalEEMod methodology. Criteria pollutant emissions from power plants are subject to local, state, and federal control measures, which can be considered to be the maximum feasible level of mitigation for power plant emissions.*

(b) Operation

Localized operational impacts are determined primarily by peak-hour intersection traffic volumes and on-site area and stationary sources. As provided in Appendix H of this Draft EIR, Alternative 3 would result in a net reduction of 24 vehicle trips during the A.M. peak hour and 28 trips during the P.M. peak hour. This alternative would generate fewer peak-hour trips compared to the Project's net reduction of 16 A.M. peak-hour trips and 9 P.M. peak-hour trips. As such, total vehicular emissions would be less compared to the Project. The development proposed under Alternative 3 would be reduced compared to the Project; therefore, area and stationary sources would generate less on-site operational air emissions compared to the Project. With the decrease in localized vehicle emissions and on-site emissions, overall localized emissions under Alternative 3 would be less the Project. As such, under Alternative 3, total contributions to localized air pollutant emissions during operation would be less than the Project's contribution. Accordingly, localized air quality impacts under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

(3) Toxic Air Contaminants

(a) Construction

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.B, Air Quality, of this Draft EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction TAC emissions generated by Alternative 3 would be less than those of the Project since excavation activities required during construction of Alternative 3 and overall construction would be reduced under this alternative. Thus, impacts due to TAC emissions and the corresponding individual cancer risk under Alternative 3 would be less than significant, and less than the impacts of the Project.

(b) Operation

As set forth in Section IV.B, Air Quality, of this Draft EIR, the primary sources of potential TACs associated with Project operations would include DPM from delivery trucks. Under Alternative 3, the number of deliveries and associated diesel particulate matter emissions would be decreased somewhat compared to the Project due to the decrease in the number of trips generated. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, and a petroleum refinery). Similar to the Project, the land use proposed under Alternative 3 is not considered a land use that generates substantial TAC emissions. Therefore, Alternative 3 would not release substantial amounts of TACs. Impacts under Alternative 3

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

c. Energy

(1) Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

(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, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Like the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. However, the energy consumed during construction of Alternative 3 would be reduced compared to the Project due to the reduction in overall construction activities. As with the Project, construction equipment used during construction of Alternative 3 would comply with Title 24 requirements where applicable, CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Alternative 3 would also implement design features, similar to the Project, to reduce energy usage and fuel consumption during construction. Specifically, like the Project, Alternative 3 would implement AQ-PDF-1 which would require the use of electricity from power poles rather than temporary gasoline or diesel powered generators where available. Therefore, as with the Project, Alternative 3 construction activities would use energy that is not wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use 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 due to the reduction in construction activities and duration.

(b) Operation

As with the Project, operation of the Senior Residential Alternative would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As previously discussed, Alternative 3 would construct 130 new senior residential units. As previously noted, the number of daily trips under Alternative 3 would be less when compared to the Project. As such, transportation fuel usage under Alternative 3 would be less in comparison to the Project. With the reduction in total floor area and residential units under Alternative 3, the consumption of electricity and natural gas, would be less than the Project. With the decrease in transportation fuel usage and decrease in on-site electricity and natural gas consumption, overall energy usage under Alternative 3 would be less than the Project. As with the Project, Alternative 3 would

implement design features to reduce energy usage. Specifically, like the Project, Alternative 3 would implement GHG-PDF-1 in Section IV.D, Greenhouse Gas Emissions, of this Draft EIR, which states that the design of new buildings would incorporate sustainability features (e.g., Energy Star–labeled products); incorporate water conservation features, such as drip/subsurface irrigation; and use LED lighting, which would reduce electricity used for lighting purposes compared to non-LED lighting. In addition, Alternative 3 would also incorporate GHG-PDF-2, which limits the number of natural gas-fueled fireplaces; therefore, reducing GHG emissions resulting from natural gas combustion. 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. Overall, impacts related to energy use during operation of Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

(2) Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section IV.C, Energy, of this Draft EIR, the energy conservation policies and plans relevant to the Project include the California Title 24 energy standards, the 2019 CALGreen Code, and the City of Los Angeles Green Building Code. As these conservation policies are mandatory under the City of LA Building Code, Alternative 3 would not conflict with applicable plans for renewable energy or energy efficiency.

With regard to transportation related energy usage, Alternative 3 would also comply with goals of the SCAG's 2016–2040 RTP/SCS and 2020–2045 RTP/SCS, which incorporate VMT targets established by SB 375. As with the Project, the uses proposed under Alternative 3 and their proximity to public transportation would serve to reduce VMT and associated transportation fuel usage within the region. In addition, vehicle trips generated during operations would comply with CAFE fuel economy standards. As with the Project, Alternative 3 would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations during construction.

Therefore, based on the above, Alternative 3 would not conflict with plans for renewable energy or energy efficiency. Impacts related to renewable energy or energy efficiency plans would be less than significant under Alternative 3, and impacts would be similar to 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 associated VMT, as well as energy consumption from proposed land uses. As previously discussed, the number of daily trips and daily VMT under Alternative 3 would decrease compared to the Project. With the reduction in square footage, Alternative 3 would also result in a decrease in energy and water consumption

compared to the Project. Overall, 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 be designed to comply with the requirements of the CALGreen Code and the Los Angeles Green Building Code. Alternative 3 would also incorporate 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 CALGreen Code and the Los Angeles Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 3 would also be consistent with the GHG reduction goals and objectives included in adopted state (Scoping Plan), regional, and local regulatory plans. Alternative 3 would also benefit from proximity to mass transit and proximity to retail and commercial uses resulting in a similar reduction in VMT in comparison to a project without trip reducing features. With the reduction in VMT and compliance with green building measures, Alternative 3 would also be consistent with the VMT reduction goals of the RTP/SCS. 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

As previously described, Alternative 3 would construct 130 new senior residential units. Under this alternative, the Project Site would be developed in accordance with the existing zoning designations of R3-1-O (Multiple Residential, Height District 1, Oil Drilling) and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling). In accordance with LAMC, the proposed buildings under Alternative 3 would range from 35 to 45 feet, or three to four stories. As previously discussed, Alternative 3 would comply with the FAR of 1.5:1 on the C2-zoned parcels and 3:1 on the R3-zoned parcels. In addition, since Alternative 3 would comply with the permitted land use and existing zoning requirements for the Project Site and would also include new uses located in an urbanized area with new pedestrian amenities and with access to transit, Alternative 3 would also not conflict with the applicable land use plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect, including those set forth in the Los Angeles General Plan, including the Framework Element, Housing Element, Conservation Element, and Mobility Plan 2035; the West Los Angeles Community Plan; the Citywide Design Guidelines; and the 2016–2040 and 2020–2045 RTP/SCS. Thus, as with the Project, the Senior Residential Alternative would not conflict with the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to consistency with land use plans would be less than significant and less than the less-than-significant impacts of the Project since Alternative 3 would require fewer discretionary actions.

f. Noise

(1) Noise

(a) Construction

The types of construction activities under Alternative 3 would be substantially similar to the Project, although the amount of construction activities and duration would be reduced due to the reduction in total floor area (from 241,754 sf to 154,105 sf) and reduced excavation associated with the 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. Due to the close proximity of the sensitive receptors (i.e., directly adjacent the Project Site), it would not be feasible to mitigate the on-site construction noise impacts of the Project, especially at receptor locations R1, R2 and R6. In addition, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to that of the Project during maximum activity days since the daily intensity of construction activities would be similar under Alternative 3, even though the overall amount and duration would decrease when compared to the Project. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Accordingly, noise impacts due to on- and off-site construction activities under Alternative 3 would be similar to those of the Project. As with the Project, Alternative 3 would implement Project Design Features NOI-PDF-1 (requiring muffling of power construction equipment) and NOI-PDF-4 (prohibiting use of impact piles, and distance limits for heavy construction equipment), and Mitigation Measure NOI-MM-1 (requiring temporary sound barriers) to reduce noise levels during construction. Similar to the Project, on-site construction noise would be significant and unavoidable under Alternative 3 even with the application of project design features and mitigation measures. In addition, cumulative on- and off-site noise impacts during Alternative 3 construction would be significant and unavoidable, similar to the Project. Overall, construction noise impacts under Alternative 3 would be similar to those of the Project.

(b) 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 mechanical equipment, activities within the proposed outdoor spaces, parking facilities, loading dock and trash collection areas; 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 and uses, the noise levels from building mechanical equipment, and outdoor spaces, would be reduced. In addition, similar to the Project, Alternative 3 would include Project Design Features NOI-PDF-2, NOI-PDF-3, and NOI-PDF-5 that require screening of outdoor

mounted mechanical equipment and loading docks and specify sound levels for outdoor sound systems, if any. Alternative 3 would include more parking spaces than the Project (260 versus 140 parking spaces). Noise levels associated with parking operation would be higher, as Alternative 3 would include one at-grade parking level (under two of the residential buildings), located at the north and northeast portion of the Project Site. Noise levels associated with the parking spaces within the fully enclosed subterranean level would be similar to the Project. Overall, the operational on-site noise impacts associated with mechanical equipment, outdoor spaces, parking facilities, and trash collection area, would be similar to the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 3 would result in a reduction in daily vehicle trips compared to the Project. Specifically, Alternative 3 would result in a net reduction of 134 daily vehicle trips, as compared to a net reduction of 75 daily vehicle trips under the Project.[20] Similar to the Project, the reduction in the traffic volumes associated with Alternative 3 would not result in any noise increase. Therefore, off-site noise impacts under Alternative 3 would be less than those of the Project due to the reduction in vehicle trips; as such, impacts would remain less than significant and less than the Project.

(2) Vibration

(a) Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although the amount and duration of construction activities would be slightly reduced. As with the Project, construction of the Senior Residential Alternative would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. While the overall amount of construction would be reduced, on- and off-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project, as construction vibration impacts are evaluated based on the maximum (peak) vibration levels generated by each type of construction equipment. As such, peak vibration levels generated by the construction equipment would be similar to those of the Project. Accordingly, vibration impacts due to on- and off-site construction activities under Alternative 3 would similarly be less than significant for on-site and off-site construction vibration (building damage) and significant and unavoidable for on-site and off-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 3 would be similar to the impacts of the Project.

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[20] *Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

(b) Operation

As described in Section IV.F, Noise, of this Draft EIR, sources of vibration related to operation of the Project would include vehicle circulation, delivery trucks, and building mechanical equipment. These same sources of operational vibration would occur under Alternative 3. As with the Project, vehicular-induced vibration from Alternative 3, including vehicle circulation within the at-grade parking level and subterranean parking level, would not generate perceptible vibration levels at off-site sensitive uses. In addition, like the Project, building mechanical equipment installed as part of Alternative 3 would include typical commercial-grade stationary mechanical equipment, such as air-condenser units (mounted at the roof level), that would include vibration-attenuation mounts to reduce vibration transmission such that the vibration would not be perceptible at the off-site sensitive receptors. Therefore, as with the Project, operation of Alternative 3 would not result in the generation of excessive ground-borne vibration levels that would be perceptible in the vicinity of the Project Site. As such, vibration impacts associated with operation of Alternative 3 would be less than significant, and similar to the Project.

g. Population and Housing

Alternative 3 would be constructed within the same Project Site as the Project. As discussed in Section II, Project Description, of this Draft EIR, the Project Site is currently developed with three multi-family residential developments with a total of 112 units. Similar to the Project, the existing 112 residential units would be removed as part of Alternative 3. and the removal of the existing residential units would be subject to the requirements of the RSO and the Ellis Act. As discussed in Section II, Project Description, of this Draft EIR, the types and sizes of units currently on the Project Site are mostly studio and one-bedroom units (approximately 275 to 375 square feet in size). As such, although the residential units under Alternative 3 would be age-restricted, and Alternative 3 would displace existing residents, the Senior Residential Alternative would increase the overall number of housing units and residents on site upon completion when compared with existing conditions. Additionally, it is anticipated that senior residents will vacate their current residential housing elsewhere to move to the Project Site upon completion of the Alternative 3, thereby providing for the availability of other housing elsewhere. As such, similar to the Project, with compliance with the relocation assistance requirements of the RSO and Ellis Act, the displacement of existing residents would not be considered substantial requiring the construction of replacement housing elsewhere. Thus, impacts with regard to displacing a substantial number of existing people or housing would be less than significant and similar to the less-than-significant impacts of the Project.

h. Public Services

(1) Fire Protection

(a) Construction

As previously discussed, the types of construction activities required for Alternative 3 would be similar to that of the Project. However, the overall amount and duration of construction activities would be reduced compared to the Project due to the reduction in development. In addition, like the Project, 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 and the associated potential need for fire protection services.

Similar to the Project, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Similar to the Project, Alternative 3 would be required to implement Project Design Feature TR-PDF-1, which would require a Construction Management Plan to ensure that adequate and safe access is available within and near the Project Site during construction activities.

Construction activities would also 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. However, Alternative 3 would implement a similar design feature in order to allow the majority of construction-related traffic, including hauling activities and construction worker trips, to occur outside the typical weekday commuter A.M. and P.M. peak periods, thereby reducing the potential for traffic-related conflicts. In addition, as mentioned above, a Construction 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 activities would not result in the need for new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain service. Impacts under Alternative 3 would be less than significant and less when compared to the less-than-significant impacts of the Project due to the reduction in construction activities and duration.

(b) Operation

Alternative 3 would generate a new residential population that would contribute to an increase in demand for LAFD fire protection and emergency medical services. Specifically, Alternative 3 would generate approximately 158 new residents.[21] As such, Alternative 2 would result in a lower residential service population when compared to the 231 new residents generated by the Project.[22] Alternative 3 would not generate any new employees on-site. As such, the overall increased demand for LAFD fire protection and emergency medical services would be reduced compared to that of 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. Similar to the Project, Alternative 3 would comply with the City's emergency access requirements set forth by the Los Angeles Department of Building and Safety and the LAFD. Alternative 3 would also not include the installation of barriers that could impede emergency vehicle access. As with the Project, LADWP would be able to supply sufficient flow and pressure to satisfy the needs of the fire suppression for Alternative 3. Therefore, similar to the Project, impacts with regard to LAFD fire protection during operation of Alternative 3 would be less than significant and would not require the addition of a new fire station or the expansion of an existing facility in order to maintain service. Operation of Alternative 3 would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities (fire protection), the construction of which would cause significant environmental impacts, in order to maintain acceptable fire protection services. Such impacts would be less than the less-than-significant impacts of the Project due to the reduction in total floor area and reduced service population.

(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 amount of construction activities and duration of construction would be reduced compared to the Project due to the reduction in development. Alternative 3 would also implement similar design features as the Project. Specifically, pursuant to Project Design Feature POL-PDF-1, Alternative 3 would be required to provide temporary security measures such as security fencing,

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[21] *Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

[22] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.1.*

lighting, and locked entry to secure the Project Site during construction, thereby reducing the demand for police protection services.

In addition, similar to the Project, travel lanes would be maintained in each direction on all streets around the Project Site throughout the construction period and emergency access would not be impeded. Similar to the Project, Alternative 3 would be required to implement Project Design Feature TR-PDF-1, which would require a Construction Management Plan 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 due to the reduction in construction activities and duration.

(b) Operation

As with the Project, Alternative 3 would generate a new residential population that would contribute to an increased demand for police services. Specifically, Alternative 3 would generate approximately 158 new residents.[23] As such, Alternative 3 would result in a lower residential service population when compared to the 231 new residents generated by the Project.[24] Alternative 3 would not generate any new employees on-site. As discussed in Section IV.H.2, Public Services—Police Protection, of this Draft EIR, the LAPD considers the residential population within their service area to evaluate service capacity. As such, while Alternative 3 would increase the existing police service population of the West Los Angeles Area compared to existing conditions, the increase would be less than for the Project due to the lower residential service population. Alternative 3 would implement similar design features as the Project. Pursuant to Project Design Feature POL-PDF-2 through Project Design Feature POL-PDF-5, this alternative would be required to provide a closed-circuit security camera system; keycard entry for the buildings and parking areas; and appropriate lighting to ensure security. The 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. As such, the impact on police protection services under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

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[23] *Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

[24] *Refer to the VMT calculation worksheets included in the Transportation Study provided in Appendix H.1.*

i. Transportation

As discussed above, Alternative 3 would be developed within the same Project Site as the Project, though the portion of Bellwood Avenue that bisects the Project Site would remain in its existing alignment. Consistent with the Project, Alternative 3 would be designed to generally conform with the applicable programs, plans, ordinances, or policies regarding the circulation system including those set forth in the Mobility Plan; Citywide Design Guideline 2; Plan for a Healthy Los Angeles; and the LAMC. Additionally, Alternative 3 would not preclude the City from implementing future improvements to serve the long-term mobility needs of the City. Furthermore, as discussed further below, impacts with respect to VMT would be less than significant, similar to the Project. Therefore, impacts associated with a potential conflict with a program, plan, ordinance, or policy addressing the circulation system would be similar to the Project's less than significant impacts.

When accounting for the same project design features as the Project, Alternative 3 would result in a lower daily VMT when compared to the Project. Specifically, as shown in Appendix H of this Draft EIR, Alternative 3 would result in net reduction of 890 total daily VMT, which would be comparatively less than the 39 net daily VMT generated by the Project.[25] Similar to the Project, Alternative 3 would not meet the 250 daily screening criteria for further VMT analysis as identified in LADOT's *Transportation Assessment Guidelines*.[26] Therefore, no impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) regarding VMT would occur and impacts would be similar to the impacts of the Project.

Alternative 3 would reduce the number of driveways compared to existing conditions. Specifically, access to the Project Site would be provided via four driveways along Bellwood Avenue. Similar to the Project, driveways under Alternative 3 would be designed, placed, and configured in accordance with LADOT's *Manual of Policies and Procedures* to limit vehicle queue and bicycle/pedestrian-vehicle conflicts. In addition, the driveways would be designed and located at a distance from Olympic Boulevard to limit queue spillovers into the public ROW and reduce interruptions to pedestrian/bicycle flow and safety. Therefore, similar to the Project, access impacts would be less than significant. Lastly, similar to the Project, construction activities under Alternative 3 could potentially

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[25] *Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

[26] *Gibson Transportation Consulting, Inc., "Transportation Analysis of Project Alternatives to the Senior Residential Community at the Bellwood Los Angeles, California," May 11, 2021. See Appendix H.3 of this Draft EIR.*

impact the provision of emergency services by the LAFD and the LAPD in the vicinity of the Project Site as a result of construction impacts to the surrounding roadways. Although Alternative 3 would not involve the vacation and realignment of Bellwood Avenue as proposed under the Project, Alternative 3 may require infrastructure improvements or upgrades that could temporarily necessitate lane closures on nearby roadways. However, Alternative 3 would also be required to implement Project Design Feature TR-PDF-1 which would require a Construction Management Plan to be implemented to ensure that adequate and safe access remains available within and near the Project Site during construction activities. Appropriate construction traffic control measures (e.g., detour signage, delineators, etc.) would also be implemented, as necessary, to ensure emergency access to the Project Site and to ensure traffic flow is maintained on adjacent right-of-ways, as well as on the City-designated disaster route along Olympic Boulevard. With regard to operation, all driveways and internal circulation would be designed to meet all applicable City Building Code and Fire Code requirements regarding emergency access, and would not include the installation of barriers that could impede emergency vehicle access. Lastly, pursuant to California Vehicle Code Section 21806, the drivers of emergency vehicles are generally able to avoid traffic in the event of an emergency by using sirens to clear a path of travel or by driving in the lanes of opposing traffic. Therefore, Alternative 3 would result in less than significant emergency access impacts that would be similar to the less than significant impacts of the Project.

j. Tribal Cultural Resources

As previously discussed, the subterranean parking levels under Alternative 3 would extend to a maximum depth of 12 feet (a reduction in the depth of grading of approximately 18 feet with an overall reduction in grading when compared to the Project). As such, Alternative 3 would construct fewer subterranean parking levels compared to the Project and would result in reduced excavation activities. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced compared to that of the Project. As discussed in Section IV.J, Tribal Cultural Resources, of this Draft EIR, no known tribal cultural resources have been identified within the Project Site or within 0.5-mile of the Project Site. Nonetheless, Alternative 3 would also implement the City's standard condition of approval to address inadvertent discovery of tribal cultural resources. As such, like the Project, impacts to tribal cultural resources would be less than significant and less than the impacts associated with the Project due to the reduction in grading activities.

k. Utilities and Service Systems

(1) Water Supply and Infrastructure

(a) Construction

Similar to the Project, construction activities associated with Alternative 3 would generate a short-term demand for water. This demand would only be slightly reduced with the reduction in construction activities and duration. 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 associated with Alternative 3 would be reduced, the temporary and intermittent demand for water during construction of Alternative 3 would similarly be expected to be met by the City's available water supplies.

As with the Project, Alternative 3 may require the upgrade of water lines that serve the Project Site as well as construction of new on-site water distribution lines to serve the new buildings and uses. Similar to the Project, the installation of water distribution lines would primarily involve trenching to place the lines below the surface. As with the Project, prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines and to avoid existing water lines and disruption of water service. Furthermore, LADWP would be notified in advance of proposed ground disturbance activities to avoid disruption of water service. LADWP would review and approve all appropriate connection requirements, pipe depths, and connection location(s). In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would also be implemented as part of the Senior Residential Alternative to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, impacts on water supply and infrastructure associated with construction activities would be less than significant under Alternative 3, and similar to the less-than-significant impacts of the Project.

(b) Operation

Based on the reduction in total development and residential units as compared to the Project, water demand for Alternative 3 would be less than the Project's estimated increase in water demand. Thus, as with the Project, the estimated water demand under Alternative 3 would not exceed the available supplies projected to be available by LADWP. Specifically, the estimated 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 off-site water distribution infrastructure would be adequate to serve Alternative 3 since the water demand would be less than the water

demand generated by the Project. Furthermore, similar to the Project, the Senior Residential Alternative would construct the necessary on-site water infrastructure and off-site connections to the LADWP water system pursuant to applicable City requirements to accommodate the new buildings. Thus, impacts to water supply under Alternative 3 would be less than significant, and less than the less-than-significant impacts of the Project.

(2) Wastewater

(a) Construction

As with the Project, wastewater generation during construction of Alternative 3 would be temporary and nominal when compared with the Project Site wastewater generation under existing conditions. Furthermore, construction workers would typically utilize portable restrooms and hand wash areas, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from construction activities under Alternative 3 is not anticipated to cause a measurable increase in wastewater flows.

As with the Project, Alternative 3 may require the construction of on-site wastewater infrastructure to serve the new buildings, and potential limited extension/upgrade and/or relocation of existing adjacent public wastewater infrastructure. Similar to the Project, these construction activities would primarily be confined to trenching and would be limited to the on-site wastewater distribution system as well as minor off-site work associated with connections to the public main. In addition, given that construction activities could temporarily affect access in adjacent rights-of-way, a Construction Management Plan, similar to the Project, would also be implemented as part of the Senior Residential Alternative to ensure adequate and safe access remains available within and near the Project Site during construction. Therefore, similar to the Project, 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 with the Project, operation of Alternative 3 would generate greater wastewater flows relative to existing conditions. However, based on the reduction in total development and residential units as compared to the Project, wastewater generation under the Senior Residential Alternative would be less than the Project's estimated wastewater flow. As provided in Section IV.K.2, Utilities and Service Systems—Wastewater, of this Draft EIR, the Project-generated wastewater could be accommodated by the existing capacity of the HWRP. Therefore, it is anticipated that the wastewater generated by Alternative 3 could also be accommodated by the existing capacity of the HWRP, and impacts with respect to treatment capacity would be less than significant.

Similar to the Project, sewer service for Alternative 3 would be provided utilizing new on-site sewer connections to the existing sewer lines adjacent to the Project Site. Given that the wastewater flows generated by Alternative 3 would be less than the estimated wastewater flows of the Project, it is anticipated that there would be sufficient capacity within the sewer lines serving the Project Site to serve the wastewater flows of Alternative 3. Furthermore, all related sanitary sewer connections and on-site infrastructure under Alternative 3 would be designed and constructed in accordance with applicable standards.

Based on the above, 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

The energy consumed by Alternative 3 would be reduced compared to the Project due to the reduced construction activities and duration. As LADWP has confirmed that the supply and existing infrastructure in the Project area would have the capacity to serve the Project Site, the existing infrastructure would similarly have capacity to supply energy for Alternative 3. Therefore, impacts on infrastructure capacity associated with short-term construction activities under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project due to the reduced construction activities.

(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, based on the uses and amount of total floor area and number of residential units proposed under Alternative 3, the total energy consumption of Alternative 3 would be less than the total energy consumption of the Project. Therefore, impacts to infrastructure capacity 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 related to on-site noise during construction and to on-site and off-site vibration during construction (pursuant to the threshold for human annoyance). Cumulative impacts with respect to on-site and off-site noise during construction and with respect to vibration impacts associated with off-site vibration during construction (pursuant to the significance threshold for human annoyance) would also remain significant and

unavoidable. Alternative 3 would reduce several of the less than significant impacts associated with the Project (e.g., the less than significant impacts associated with operational air quality emissions and greenhouse gases, traffic noise, TACs during construction, energy efficiency during construction, tribal cultural resources, police and fire protection services, water and wastewater during operation and energy infrastructure). All other impacts would be similar to those of the Project.

4. Relationship of the Alternative to Project Objectives

Alternative 3 would construct 130 new senior residential units. Like the Project, the new residential units under Alternative 3 would be designated senior housing units; however, Alternative 3 would not be an eldercare facility and would not include integrated care and services. As such, Alternative 3 would partially meet the Project's underlying purpose to provide a senior residential housing community that meets the needs of an increasingly aging population in the City by providing variety in housing together with integrated services. Alternative 3 would partially meet the following objectives:

- Promote adequate housing that is accessible to senior citizens by providing a new senior-only housing residential community that meets the daily living needs of the City's aging adult population, including recreational and social needs on-site, advancing the West Los Angeles Community Plan Objective 1-4 and supporting General Plan (Housing Element) Objective 1.1 to provide housing to meet current and projected needs.

- Develop senior-independent units, assisted living guest rooms, and memory care guest rooms to help meet the specific housing needs of the City's aging population, consistent with General Plan (Housing Element) Objective 1.1, and Policy 1.1.3, and West Los Angeles Community Plan Objective 1-1 to construct a range of different housing types that address the diverse needs of the City's existing residents and projected population.

- Locate senior citizen housing within reasonable walking distance of health and community facilities, services and public transportation by integrating supporting services with the senior housing units in one building, supporting the West Los Angeles Community Plan Policy 1-2.2.

- Provide a range of on-site recreational, health, wellness and dining activities and services to support the daily needs of seniors and promote safety and health consistent with General Plan (Housing Element) Objective 2.1.

- Alternative 3 would not meet the following basic Project objective as Alternative 3 would not involve the vacation and realignment of Bellwood Avenue as proposed under the Project:

- Unify the Project Site to maximize efficient use of the site and associated parcels and orient development to and respond to the low- to mid-scale character of surrounding land uses while maintaining adequate public circulation.

V. Alternatives

D. Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in an EIR. The CEQA Guidelines also state that should 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 the No Project/No Build Alternative; the Commercial/Residential Alternative; and the Senior Residential Alternative. Table V-1 on page V-8 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 Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the Project.

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- and off-site construction noise impacts and on- and off-site construction vibration impacts with respect to human annoyance. Alternative 1 would also avoid the Project's significant and unavoidable cumulative impacts related to on- construction noise impacts, as well as the Project's cumulative off-site construction vibration impacts related to human annoyance. Alternative 1 would also further reduce most of the Project's remaining less-than-significant impacts as no changes to the existing conditions would occur. However, without updating the existing older and more energy consuming buildings, Alternative 1 would result in a greater impact associated with energy efficiency compared to the Project, although this impact would remain less than significant.

In accordance with the CEQA Guidelines requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative 3, the Senior Residential Alternative, would be the Environmentally Superior Alternative amongst the remaining alternatives. As discussed above, while Alternative 3 would not substantially reduce or eliminate the

significant and unavoidable impacts of the Project associated with noise and vibration during construction, Alternative 3 would reduce several of the less than significant impacts associated with the Project (e.g., the less than significant impacts associated with operational air quality emissions and greenhouse gases, traffic noise, TACs during construction, energy efficiency during construction, tribal cultural resources, police and fire protection services, water and wastewater during operation, and energy infrastructure). However, as discussed above, Alternative 3 would only partially meet the underlying purpose of the Project and the Project objectives.