

I. Executive Summary

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this section of this Draft Environmental Impact Report (EIR) contains a brief summary of the Senior Residential Community at The Bellwood (Project) and its potential environmental effects. More detailed information regarding the Project and its potential environmental effects is provided in the following sections of this Draft EIR. Also included in this section is an overview of the purpose and focus of this Draft EIR, a description of the organization of this Draft EIR, a general description of the Project, a general description of areas of controversy, a description of the public review process for this Draft EIR, a list of the project design features and mitigation measures to be implemented as part of the Project, and a summary of the alternatives to the Project evaluated in this Draft EIR including identification of the Environmentally Superior Alternative.

1. Purpose of this Draft EIR

As described in Section 15123(a) and 15362 of the CEQA Guidelines, an EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize any significant effects, and describe reasonable project alternatives. Therefore, the purpose of this Draft EIR is to focus the discussion on the Project's potential environmental effects that the City of Los Angeles (City), as the Lead Agency, has determined to be, or potentially may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce or avoid the Project's significant environmental impacts.

This Draft EIR serves as the environmental document for all actions associated with the Project. This EIR is a "Project EIR" as defined by Section 15161 of the CEQA Guidelines. Furthermore, this Draft EIR complies with Section 15064 of the CEQA Guidelines, which discusses determining the significance of the environmental effects caused by a project.

2. Draft EIR Focus and Effects Found Not to Be Significant

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were

determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the Project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Governor's Office of Planning and Research, responsible agencies, owners and occupants within a 500-foot radius of the Project Site, and other interested parties on June 12, 2019, for a 30-day review period. The Initial Study, NOP, and NOP comment letters are included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each environmental area is or is not analyzed further in this Draft EIR. The City determined through the Initial Study the potential for significant impacts and thus, the need for further analysis of the following environmental issue areas:

- Aesthetics (conflict with applicable zoning and other regulations regarding scenic quality).
- Air Quality (conflict with air quality plan, increase of criteria pollutant, exposure to pollutant concentrations)
- Energy
- Greenhouse Gas Emissions
- Land Use and Planning (conflict with plans, policies or regulations)
- Noise (temporary or permanent increase in ambient noise levels and generation of vibration)
- Population and Housing (displacement of people or housing)
- Public Services (fire protection and police protection)
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems (water supply/infrastructure, wastewater infrastructure, and energy infrastructure)

The City determined through the Initial Study that the Project would not have the potential to cause significant impacts related to: aesthetics (scenic vistas, scenic resources, and light/glare); agriculture and forestry resources; air quality (odors); biological resources; cultural resources; geology and soils, including paleontological resources (with mitigation); hazards and hazardous materials; hydrology and water quality; land use and planning (division of an established community); mineral resources; noise (airport or airstrip-related noise); population and housing (induced population growth); public services (schools, parks, and libraries); recreation; utilities and service systems (stormwater

drainage facilities and solid waste); and wildfire. Therefore, these areas were not analyzed further in this Draft EIR. The Initial Study demonstrating that no significant impacts would occur for these issue areas is included in Appendix A of this Draft EIR.

3. Draft EIR Organization

This Draft EIR is comprised of the following sections:

- I. **Executive Summary.** This section describes the purpose of this Draft EIR, Draft EIR focus and effects found not to be significant, Draft EIR organization, Project summary, areas of controversy and issues to be resolved, public review process, a summary of environmental impacts and mitigation measures, and a summary of alternatives.
- II. **Project Description.** This section describes the Project location, existing conditions, Project objectives, and characteristics of the Project.
- III. **Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built in the vicinity of the Project Site.
- IV. **Environmental Impact Analysis.** This section contains the environmental setting, Project and cumulative impact analyses, project design features, mitigation measures (where necessary), and conclusions regarding the level of significance after mitigation for each of the following environmental issues: aesthetics; air quality; energy; greenhouse gas emissions; land use and planning; noise; population and housing; public services (fire protection and police protection); transportation; tribal cultural resources; and utilities and service systems (water supply and infrastructure, wastewater, energy infrastructure).
- V. **Alternatives.** This section provides an analysis of a reasonable range of alternatives to the Project including: No Project/No Build Alternative; Commercial/Residential Alternative; and Senior Residential Alternative.
- VI. **Other CEQA Considerations.** This section provides a discussion of significant unavoidable impacts that would result from the Project and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment and potential secondary effects that would result from the Project is also presented here. This section also analyzes potential growth-inducing impacts of the Project and potential secondary effects caused by the implementation of the mitigation measures for the Project. Lastly, a summary

of the possible effects of the Project that were determined not to be significant within the Initial Study is provided.

VII. References. This section lists the references and sources used in the preparation of this Draft EIR.

VIII. Acronyms and Abbreviations. This section provides a list of acronyms and abbreviations used in this Draft EIR.

IX. List of Preparers. This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the Project and appendices as follows:

- Appendix A Initial Study, NOP, and NOP Comment Letters
 - Appendix A.1 Initial Study
 - Appendix A.2 Notice of Preparation
 - Appendix A.3 NOP Comment Letters and Scoping Meeting Comments
- Appendix B Aesthetics Tables
- Appendix C Air Quality and Greenhouse Gas Emissions
 - Appendix C.1 Air Quality and Greenhouse Gas Emissions Methodology
 - Appendix C.2 Air Quality Worksheet and Modeling Output Files
 - Appendix C.3 Greenhouse Gas Worksheets and Modeling Output Files
 - Appendix C.4 Air Quality Modeling Output Files for Alternatives
- Appendix D Energy Resources Calculations
- Appendix E Land Use Tables
- Appendix F Noise Calculation Worksheets
- Appendix G Public Service Provider Response Letters
 - Appendix G.1 Los Angeles Fire Department Letter
 - Appendix G.2 Los Angeles Police Department Letter

- Appendix H Transportation
 - Appendix H.1 Transportation Assessment
 - Appendix H.2 Los Angeles Department of Transportation Assessment Letter
 - Appendix H.3 Transportation Analysis for Project Alternatives
- Appendix I Tribal Cultural Resources
 - Appendix I.1 Tribal Cultural Resources Report
 - Appendix I.2 AB 52 Notification Letters
- Appendix J Utility Infrastructure Technical Report

4. Existing Project Site Conditions

The approximate 2.22-acre Project Site is located at 10328–10384 and 10341–10381 Bellwood Avenue (Project Site) within the West Los Angeles Community Plan area of the City of Los Angeles (City).¹ The Project Site is irregularly shaped and is bisected by Bellwood Avenue, a U-shaped street that connects to Olympic Boulevard at each end. The Project Site includes parcels located generally north/west and east/south of Bellwood Avenue as well as the portion of Bellwood Avenue that bisects the Project Site.

The Project Site is currently developed with several multi-family residential buildings and associated structures and parking. Specifically, the Project Site encompasses three multi-family residential developments totaling 43,939 square feet, including 112 units. These three multi-family residential developments include a two-story, 13-unit building located at 10341–10381 Bellwood Avenue; seven, two-story buildings with a total of 82 units located at 10328–10366 Bellwood Avenue; and six one-story bungalow court buildings located at 10368–10384 Bellwood Avenue with a total of 17 units. The existing units are generally approximately 275 square feet to 375 square feet in size. Access to each of the multi-family residential developments is currently available via several driveways along Bellwood Avenue. Existing landscaping within the Project Site includes 96 ornamental trees and shrubs, including eight street trees located within the portion of Bellwood Avenue proposed to be vacated and realigned, as well as ornamental trees with trunks on or partially on adjacent properties but with roots and canopies on the Project Site. Along the southern and eastern boundaries of the Project Site there is a grade difference

¹ *The lot area following the proposed merger and subdivision, including the vacated and realigned portion of Bellwood Avenue and excluding an anticipated 5-foot right-of-way dedication on a portion of Bellwood Avenue, would be 93,422 square feet or 2.14 acres. The total lot area may vary depending on the ultimate configuration and designation of the realigned portion of Bellwood Avenue.*

ranging between approximately 14 feet to 42 feet, such that the Project Site is situated below most of the adjacent single-family residential uses. This sloping topography continues across the Project Site and its surroundings towards Olympic Boulevard.

The Project Site has a Neighborhood Commercial General Plan land use designation and is zoned R3-1-O (Multiple Residential, Height District 1, Oil Drilling)² and C2-1VL-O (Commercial, Height District 1VL, Oil Drilling).³ The R3 designation permits 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. The C2 designation permits 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. 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. The “O” designation indicates the Project Site is located within an Oil Drilling District where the drilling of oil wells or the production from the wells of oil, gases, or other hydrocarbon substances is permitted.

5. Description of the Proposed Project

The Project proposes the development of an eldercare facility consisting of up to 192 senior housing residential units comprised of 71 senior-independent dwelling units,⁴ 75 assisted living guest rooms, and 46 memory care guest rooms; 50,463 square feet of indoor common areas that include space for supporting services, common dining areas, a gym, indoor pool and spa, wellness center, activity rooms, family/living rooms, and building lobby and reception area; and 14,630 square feet of outdoor common areas, including several courtyards and terraces that would be distributed throughout the Project Site. The proposed uses would be located within a single building ranging in height from up to 38 feet to 70 feet, or three to six stories. A total of up to 140 vehicle parking spaces would be provided within two subterranean levels beneath the proposed building. Three existing multi-family residential developments with a total of 43,939 square feet, including 112 residential units, would be removed to accommodate the Project. Additionally, as part of

² *The R3 zoning applies to Lots 29-35 of Block 13 of Tract 7260.*

³ *The C2 zoning applies to Lots 36-37 of Block 13 of Tract 7260 and Lots 10-13 of Block 14 of Tract 7260.*

⁴ *In order to allow Project residents to age in place and avoid the need to relocate to an assisted living guest room if additional care is needed, the 71 senior independent living units would also meet the regulatory requirements for assisted living units; however, whether used for independent living or assisted living, the total number of dwelling units (71) would remain the same.*

the Project, the portion of Bellwood Avenue that bisects the Project Site would be vacated and realigned, with through access maintained from both sides of Bellwood Avenue.⁵ The Project would comprise 241,754 square feet of floor area with a floor area ratio (FAR) of up to approximately 2.77:1 to 3.2:1.⁶

The Project would provide care, services and assistance for the daily living needs of its residents. Assistance and activities provided on-site would include laundry, housekeeping, exercise and fitness classes, art and recreational classes, social events, and service of three meals per day in common dining rooms. Caregivers and staff will be trained in senior care and emergency response, and nurses would also be located onsite. A shuttle service would be provided for local trips to shopping and services.

6. Areas of Controversy

Based on the NOP comment letters and scoping meeting comments provided in Appendix A of this Draft EIR, issues known to be of concern included, but were not limited to, Project impacts associated with aesthetics, noise, and traffic. In addition, agencies such as Caltrans, the South Coast Air Quality Management District (SCAQMD) and LA Sanitation submitted NOP comment letters that provided input for evaluating the impacts of the Project. Refer to Appendix A of this Draft EIR for copies of the NOP comment letters and comments received during the scoping meeting.

7. Public Review Process

The City prepared an Initial Study and circulated an NOP for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on June 12, 2019, for a 30-day review period. The City also carried out a public scoping meeting for the Project on June 26, 2019. The Initial Study, NOP, NOP comment letters, and scoping meeting comments are included in Appendix A of this Draft EIR.

⁵ *The portion of Bellwood Avenue that bisects the Project Site is proposed to be vacated as a public street and merged with the Project Site parcels. The segment of Bellwood Avenue through the Project Site would be realigned along the northern part of the Project Site, closer to Olympic Boulevard, and through public access would be maintained. While the realigned portion of Bellwood Avenue through the Project Site is currently proposed to become a private street; it could alternatively be dedicated to the City as a public street.*

⁶ *Based on buildable area (as defined in Los Angeles Municipal Code Section 12.03) of approximately 87,421 square feet. FAR is a calculation of the ratio of building square footage to buildable lot area. As the final buildable lot area may vary based on the ultimate configuration and designation of the realigned portion of Bellwood Avenue, the FAR may range from approximately 2.77:1 to 3.2:1; however, the square footage of the building would not change.*

This Draft EIR is being circulated for a 45-day public comment period. Following the public comment period, a Final EIR will be prepared that will include responses to the comments raised regarding this Draft EIR.

8. Summary of Environmental Impacts

Table I-1 on page I-9 summarizes the environmental impacts of the Project evaluated in this Draft EIR. Based on the analysis in Section IV, Environmental Impact Analysis, of this Draft EIR, implementation of the Project would result in significant and unavoidable environmental impacts relative to: construction noise and vibration (on-site construction noise and on-site and off-site construction vibration impacts related to human annoyance). Cumulative impacts associated with on- and off-site noise during construction and off-site vibration during construction related to human annoyance, would also be significant and unavoidable.

**Table I-1
Summary of Impacts Under the Project**

Environmental Topic	Project Impact Determination
A. AESTHETICS	
<i>Conflict with Applicable Regulations Governing Scenic Quality</i>	Less Than Significant
B. AIR QUALITY	
<i>Regional Emissions</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Localized Emissions</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Toxic Air Contaminants</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
C. ENERGY	
<i>Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Conflict with Plans for Renewable Energy or Energy Efficiency</i>	Less Than Significant
D. GREENHOUSE GAS EMISSIONS	
<i>GHG Emissions</i>	Less Than Significant
E. LAND USE AND PLANNING	
<i>Conflict with Land Use Plans</i>	Less Than Significant
F. NOISE	
<i>Construction^a</i>	
<i>On-Site Noise</i>	Significant Unavoidable
<i>Off-Site Noise</i>	Less Than Significant
<i>On-Site Vibration (Building Damage)</i>	Less Than Significant
<i>On-Site Vibration (Human Annoyance)</i>	Significant Unavoidable
<i>Off-Site Vibration (Building Damage)</i>	Less Than Significant
<i>Off-Site Vibration (Human Annoyance)</i>	Significant Unavoidable
<i>Operation</i>	
<i>On-Site Noise</i>	Less Than Significant
<i>Off-Site Noise</i>	Less Than Significant
G. POPULATION AND HOUSING	
<i>Displace Substantial Numbers of Existing People or Housing</i>	Less Than Significant
H. PUBLIC SERVICES	
<i>Fire Protection</i>	

Table I-1 (Continued)
Summary of Impacts Under the Project

Environmental Topic	Project Impact Determination
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Police Protection</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
I. TRANSPORTATION	
<i>Conflict with Transportation Plans</i>	Less Than Significant
<i>Vehicle Miles Traveled</i>	No Impact
<i>Emergency Access</i>	Less Than Significant
J. TRIBAL CULTURAL RESOURCES	
<i>Tribal Cultural Resources</i>	Less Than Significant
K. UTILITIES AND SERVICE SYSTEMS	
<i>Water Supply and Infrastructure</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Wastewater</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<i>Energy Infrastructure</i>	
<i>Construction</i>	Less Than Significant
<i>Operation</i>	Less Than Significant
<hr/> <p>^a <i>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.</i> Source: <i>Eyestone Environmental, 2021.</i></p>	

9. Project Design Features

The following project design features would be implemented as part of the Project:

a. Aesthetics

Project Design Feature PDF A-1: Glass used in building façades shall be low-reflective or treated with an anti-reflective coating to minimize glare. Consistent with applicable energy and building code requirements, including Section 140.3 of the California Energy Code as may be

amended, glass with coatings required to meet the Energy Code requirements shall be permitted.

b. Air Quality

Project Design Feature AQ-PDF-1: Where power poles are available, electricity from power poles and/or solar-powered generators rather than temporary diesel or gasoline generators shall be used during construction.

c. Greenhouse Gas Emissions

Project Design Feature GHG-PDF-1: The design of the new buildings will incorporate the following sustainability features:

- a. Use of Energy Star–labeled products and appliances.
- b. Use of light-emitting diode (LED) lighting or other energy-efficient lighting technologies, such as occupancy sensors or daylight harvesting and dimming controls, where appropriate, to reduce electricity use.
- c. Water-efficient plantings with drought-tolerant species;
- d. Fenestration designed for solar orientation; and
- e. Pedestrian- and bicycle-friendly design with short-term and long-term bicycle parking.

Project Design Feature GHG-PDF-2: The use of natural gas-fueled fireplaces will be limited to common areas and the top floor residential dwelling units.

d. Noise

Project Design Feature NOI-PDF-1: Power construction equipment (including combustion engines), fixed or mobile, will be equipped with state-of-the-art noise shielding and muffling devices (consistent with manufacturers' standards). All equipment will be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. The construction contractor will keep documentation on-site demonstrating that the equipment has been maintained in accordance with manufacturer's specifications.

Project Design Feature NOI-PDF-2: All outdoor mounted mechanical equipment will be screened from off-site noise-sensitive receptors. The equipment screen shall be impermeable (i.e., solid material with minimum weight of 2 pounds per square feet) and break the line-of-sight from the equipment to the off-site noise-sensitive receptors.

Project Design Feature NOI-PDF-3: The loading dock will be screened from off-site sensitive noise receptors by the perimeter wall (ranging from

approximately 4 feet to approximately 9 feet in height) at the northeastern property line and include an interior loading area (i.e., delivery vehicles would be located in the exterior loading driveway area, but unloading/loading activities would occur within an interior loading area in the ground floor of the building).

Project Design Feature NOI-PDF-4: Project construction will not include the use of driven (impact) pile systems.

Project Design Feature NOI-PDF-5: Outdoor amplified sound systems, if any, will be designed so as not to exceed the maximum noise level of 70 dBA (L_{eq-1hr}) at a distance of 15 feet from the amplified speaker sound systems at the Level P1 Courtyard. A qualified noise consultant will provide written documentation that the design of the system complies with this maximum noise level.

e. Public Services—Police Protection

Project Design Feature POL-PDF-1: During construction, the Applicant will implement temporary security measures including security fencing, lighting, and locked entry.

Project Design Feature POL-PDF-2: During operation, the Project will include private 24-hour on-site security, a closed circuit security camera system, and keycard entry for the building and the parking areas.

Project Design Feature POL-PDF-3: During operation, the Project will provide sufficient lighting of building entries and walkways to facilitate pedestrian orientation and clearly identify a secure route between parking areas and points of entry into the building.

Project Design Feature POL-PDF-4: During operation, the Project will provide sufficient lighting of parking areas, elevators, and lobbies to maximize visibility and reduce areas of concealment.

Project Design Feature POL-PDF-5: Prior to the issuance of a building permit, the Applicant will submit a diagram of the Project Site to the LAPD's West Los Angeles Area Commanding Officer that includes access routes and any additional information that might facilitate police response.

f. Transportation

Project Design Feature TR-PDF-1: A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan, will be prepared and submitted to the City for review and approval, prior to the issuance of a demolition permit or building permit. The Construction Management Plan will be based on the nature and timing of the specific construction activities and other

projects in the vicinity of the Project Site, and will include, but not be limited to, the following elements, as appropriate:

- Advance notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary traffic control during construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men), as appropriate.
- Containment of Project construction activity associated with the new building and on-site improvements within the Project Site boundaries.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., to occur outside commuter peak hours to the extent feasible. (Commuter peak hours are 7:00 A.M. to 9:00 A.M. and 3:00 P.M. to 6:00 P.M.).
- Spacing of trucks so as to discourage a convoy effect (e.g., vehicles traveling together as a group).
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading, and construction.
- Traffic management personnel would be trained to assist in emergency response by restricting or controlling the movement of traffic that could interfere with emergency vehicle access.

10. Mitigation Measures

The following mitigation measures would be implemented as part of the Project:

a. Geology and Soils

Mitigation Measure CUL-MM-1: If paleontological materials are encountered during Project grading and excavation, a qualified paleontologist shall be retained by the Applicant, and grading and excavation in the area of the exposed material shall be temporarily diverted or redirected to

facilitate evaluation by the paleontologist and, if necessary, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study or report evaluating the impact. The Applicant shall comply with the recommendations of the evaluating paleontologist, and a copy of the paleontological survey report shall be submitted to the Los Angeles County Natural History Museum and the Department of City Planning. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

b. Noise

Mitigation Measure NOI-MM-1: Prior to the start of demolition activities, a temporary and impermeable sound barrier shall be erected and maintained at the locations listed below and shown in Figure IV.F-2 on page IV.F-40 of Section IV.F., Noise, of this Draft EIR, during earthmoving and exterior construction of the Project building. At plan check, building plans shall include documentation prepared by a noise consultant verifying compliance with this measure.

- Along the northern property line of the Project Site between the construction areas and the Century Park hotel on the north side of Bellwood Avenue and the Courtyard by Marriott on the east side of Bellwood Avenue (receptor location R2), and the residential use on the north side of Lauriston Avenue (receptor location R3). The temporary sound barrier shall be designed to provide a minimum 15-dBA noise reduction at the ground level of the Century Park hotel and the Courtyard by Marriott (receptor location R2), and minimum 9-dBA noise reduction at the residential use on Lauriston Avenue (receptor location R3).
- Along the northwestern property line of the Project Site between the construction areas and residential use at the northwest corner of Olympic Boulevard and Kerwood Avenue (receptor location R4). The temporary sound barrier shall be designed to provide a minimum 5-dBA noise reduction at the ground level of receptor location R4.
- Along the western property line of the Project Site between the construction areas and the residential uses on Kerwood Avenue (receptor locations R5 and R6). The temporary sound barrier shall be designed to provide a minimum 7-dBA noise reduction at the ground level of receptor location R5 and a minimum 15-dBA noise reduction at the ground level of receptor location R6.
- Along the southern property line of the Project Site between the construction areas and the residential uses on Keswick Avenue (receptor location R1). The temporary sound barrier shall be

designed to provide a minimum 15-dBA noise reduction at the ground level of receptor location R1.

- In the event landscaping of the side yard along the eastern property line adjacent to the residential uses along Orton Avenue utilizes heavy construction equipment (e.g., large bulldozer and excavator), a temporary sound barrier at the side yard elevation shall be designed to provide a minimum 15-dBA noise reduction at the ground level of the residential uses along Orton Avenue.

Mitigation Measure NOI-MM-2: The use of large construction equipment (i.e., large bulldozer, caisson drill rig, and/or loaded trucks) shall be a minimum of: 13 feet away from the residences abutting the Project Site on the east side of Kerwood Avenue, 13 feet away from the commercial buildings (located at 10390 Bellwood Avenue and 10344 Olympic Boulevard) adjacent to the Project Site, and 6 feet away from the Century Park hotel.

Mitigation Measure NOI-MM-3: The use of jackhammers will be a minimum of 6 feet away from the residences abutting the Project Site on the east side of Kerwood Avenue and the commercial buildings located at 10390 Bellwood Avenue and 10344 Olympic Boulevard.

11. Summary of Alternatives

This Draft EIR examined three alternatives to the Project, including the No Project/No Build Alternative, the Commercial/Residential Alternative, and the Senior Residential Alternative. A general description of these alternatives is provided below. Refer to Section V, Alternatives, of this Draft EIR for a more detailed description of these alternatives, a comparative analysis of the impacts of these alternatives with those of the Project, and a description of the alternatives considered but rejected as infeasible.

a. Alternative 1: No Project/No Build 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.

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.

b. Alternative 2: Commercial/Residential Alternative

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). Based on the existing land use and zoning of the Project Site, 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.

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.

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 compared to the Project, although 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.

c. Alternative 3: Senior Residential 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. 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 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.

Alternative 3 would not eliminate the Project's significant and unavoidable impacts related to onsite 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. Impacts associated with off-site mobile noise and land use consistency would be somewhat greater than the Project due to the increase in vehicle trips associated with Alternative 3, although these impacts would remain less than significant. 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.

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.

Of the alternatives analyzed in this Draft EIR, Alternative 1, the No Project/No Build Alternative would avoid all of the Project's significant environmental impacts, including the Project's significant and unavoidable impacts related to on-site 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, Alternative 3 would only partially meet the underlying purpose of the Project and the Project objectives.