5.0 Alternatives

5.0 Alternatives

5.0.1 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), including the following:

> *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 state 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) includes the following:

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 (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent).

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.

5.0.2 Overview of Selected Alternatives

As indicated above, the intent of the alternatives analysis is to provide a comparative analysis of alternatives versus a project in order to identify opportunities to avoid or substantially lessen any of the significant effects of a project while feasibly attaining most of a project's objectives. Based on the analysis in Section 4.0, Environmental Impact Analysis, of this Final EIR, implementation of the Project would not result in any significant impacts that cannot be feasibly mitigated at the Project level or cumulative level. Notwithstanding, the Project includes environmental impacts that would be less than significant or less than significant with mitigation, as analyzed throughout this Final EIR, which may be further reduced through the selection of an alternative to the Project. Accordingly, the following alternatives to the Project have been selected for evaluation based on the environmental impacts of the Project and the objectives established for the Project:

- Alternative 1: No Project 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: Reduced Excavation and Reduced Parking Alternative—Alternative 2 would include the same uses as the Project but would eliminate the third level of subterranean parking and incorporate the use of stacked parking, resulting in a total of 117 parking spaces with an excavation depth of approximately 35 feet.

- Alternative 3: Zoning Compliant Alternative—Alternative 3 considers development of the Project Site in accordance with its existing land use and

zoning designations. Alternative 3 would retain the hotel and retail uses proposed as part of the Project while eliminating the restaurant, bar, wellness center, spa, private club, and penthouse uses. Alternative 3 would include three stories with 36 hotel guest rooms and one subterranean parking level with a total of 90 parking spaces and an excavation depth of approximately 15 feet.

- Alternative 4: Reduced Height Alternative—Alternative 4 would include the same uses, floor area, and parking spaces as proposed by the Project but would redistribute the massing of the building to reduce the overall height from a maximum 115 feet to 89 feet and seven stories. Alternative 4 would also reorient the Project's proposed U-shaped building to the south, such that the bulk of its massing would be positioned between the outdoor spaces where amplification is proposed and the residential neighborhoods to the north.

- Alternative 5: Reduced Project Alternative—Alternative 5 would eliminate the private club and third level of subterranean parking while retaining the remaining mix of uses at a reduced scale. As such, Alternative 5 would eliminate the ground floor restaurant and replace it with a down ramp internal to the Project Site, as well as reduce the floor area of the wellness center and spa and the sixth-floor restaurant. Access to these spaces would be restricted to guests only. Alternative 5 would include seven stories with 85 hotel guest rooms and two subterranean parking levels for parking with a total of 94 parking spaces.

Table 5.0-1 on page 5.0-4 provides a comparison of the Project with the five alternatives being considered. Each of these alternatives is described in more detail 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. Such potential alternatives are described below.

Table 5.0-1
Summary of Development Proposed by the Alternatives to the Project

	Project (Specific Plan Maximum)	Alternative 1: No Project (Existing Conditions)	Alternative 2: Reduced Excavation and Reduced Parking Alternative	Alternative 3: Zoning Compliant Alternative	Alternative 4: Reduced Height Alternative	Alternative 5: Reduced Project Alternative
Hotel Guest Rooms	115 rm	0 rm	115 rm	36 rm	115 rm	85 rm
Total Floor Area	220,950 sf	56,787	220,950 sf	105,214 sf	220,950 sf	168,403 sf
Total Above-Ground FAR	3.91:1 (4.2:1 overall)	1.02:1	3.91:1 (4.2:1 overall)	2:1	3.91:1 (4.2:1 overall)	3.0:1 (3.2:1 overall)
Total Parking	~~178~~185 spaces	65 spaces	117 spaces[a]	90 spaces	~~178~~185 spaces	94 spaces
Maximum Heights	up to 115 ft (up to 9 levels)	(up to 2 levels)	up to 115 ft (up to 9 levels)	up to 45 ft (up to 3 levels)	up to 89 ft (up to 7 levels)	up to 92.5 ft (up to 7 levels)
Maximum Depth of Excavation	44 ft below grade (3 subterranean levels)	(1 subterranean level)	35 ft below grade (2 subterranean levels)	15 ft below grade (1 subterranean level)	44 ft below grade (3 subterranean levels)	35 ft below grade (2 subterranean levels)

du = dwelling units

FAR = floor area ratio

ft = feet

rm = rooms

sf = square footage

[a] *Alternative 2 would incorporate the use of stacked parking to provide 117 total parking spaces.*

Source: Eyestone Environmental, 2022.

5.0.3 Summary of Project Objectives

CEQA Guidelines Section 15126.6(a) states that an EIR's alternatives analysis "shall describe a reasonable range of alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project," even if those alternatives would impede to some degree the attainment of the project's objectives, or would be more costly.

The Project's underlying purpose is to revitalize the Project Site by developing a high quality hotel driven anchor development project that provides new lodging opportunities within the City to serve the region and tourists as well as publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site.

Table 5.0-2 on page 5.0-6 provides a summary of those components of the Project that meet the Project objectives, in order to provide a basis for comparison of the extent to which the alternatives meet, or do not meet, the Project objectives. Additionally, Table 5.0-3 on page 5.0-9 provides a summary of the extent to which the Project objectives are met, partially met, or not met, by each alternative.

Table 5.0-2
Summary of Project Components that Meet the Project Objectives

Project Objectives	Project Components That Meet the Objectives
Support and expand tourism and business activity by developing new lodging opportunities that are easily accessible to entertainment and commercial destinations in the City of Beverly Hills.	The Project proposes a luxury hotel development and new anchor use on a 1.277 acre Project Site at the northern end of Rodeo Drive that incorporates a wide array of luxury services available to hotel guests and other visitors, including ground floor retail, three restaurants, a spa, wellness center including a gym, and a private members club, that will attract domestic and international visitors to Beverly Hills and the Business Triangle.
Provide short- and long-term employment opportunities and maximize transient occupancy tax revenue for the City through the development of a one-of-a-kind luxury hotel that will attract visitors to the Business Triangle and Beverly Hills.	The Project proposes a one-of-a-kind luxury hotel, incorporating design and service standards that will attract international and domestic guests and other visitors to the Projects' hotel, retail, three restaurants, spa, wellness center including gym, and private members club, as well as to the Beverly Hills Business Triangle. The Project's design includes modulation, articulation and upper story step backs, a publicly accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, a trellis-like garden porte cochere, guest balconies, awnings and greenery, widened sidewalks with continuous planted parkways and special paving, and will provide a new architectural destination attracting international and domestic hotel guests and visitors to the Project's hotel, retail, three restaurants, spa, wellness center including gym, and private members club, as well as the Beverly Hills Business Triangle.
Reduce vehicular trips and promote local and regional mobility objectives by developing a hotel use with convenient access to a variety of alternative transportation options including walking, biking, and public transit, and in close proximity to popular tourist destinations.	The Project Site's infill location in the northern portion of the Business Triangle and mix of hotel, retail, restaurants, spa, wellness center including gym, and private members club, uses in close proximity to transit will reduce vehicle trips and promote local and regional mobility objectives. The Project will provide guests and visitors with electrical vehicle charging stations and short term bicycle parking, and employees with lockers, showers and long term secure bicycle parking (including charging stations for e-bicycles), to encourage commuting by bicycle, thereby reducing vehicle trips and promoting local and regional mobility objectives. The Project's hotel and club employees who commute by transit will be provided with free transit passes, thereby reducing vehicle trips and promoting local and regional mobility objectives.

Table 5.0-2 (Continued)
Summary of Project Components that Meet the Project Objectives

Project Objectives	Project Components That Meet the Objectives
	The Project proposes a publicly accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, and widened sidewalks with continuous planted parkways and special paving to improve the pedestrian environment, thereby promoting local and regional mobility objectives in close proximity to popular tourist destinations.
Replace existing uses and structures with economically viable and aesthetically attractive anchor development on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.	The Project's design includes modulation, articulation and upper story step backs, a publicly accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, a trellis-like garden porte cochere, guest balconies, awnings and greenery, widened sidewalks and continuous planted parkways and special paving, and provides a development on the 1.277 Project Site that is physically compatible with the surrounding neighborhood. The Project's luxury up-to 115 hotel rooms, ground floor retail, three restaurants, spa, wellness center including gym, and private members club are programmatically compatible with the existing uses in the vicinity.
Improve the pedestrian experience and enhance walkability through a pedestrian friendly design that includes pedestrian amenities at ground level.	The Project's ground floor restaurant, ground floor retail with large windows facing the sidewalk, the publicly accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, trellis-like garden porte cochere, and widened sidewalks with continuous planted parkways and special paving provides a pedestrian friendly design and amenities.
To accommodate vehicle flow on adjacent City streets and promote multiple transportation modes (walking, bicycling) by relocating the alley bisecting the Project Site, placing parking underground, limiting driveway access points, and enhancing the pedestrian environment on all of the adjoining streets.	The Project removes and relocates the alley that bisects the Project Site and provides a publicly accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, a ground floor restaurant, a trellis-like garden porte cochere, an up ramp from the below grade parking connecting to an internal access to the motor court for valet return of guest vehicles, for employee, delivery, service and utility vehicle traffic to exit via the southbound alley, and widened sidewalks with continuous planted parkways and special paving, thereby limiting driveway access points and enhancing the pedestrian environment on all of the adjoining

Table 5.0-2 (Continued)
Summary of Project Components that Meet the Project Objectives

Project Objectives	Project Components That Meet the Objectives
	streets. The Project's bicycle parking, including for employees' secure long-term bike parking (including e-bicycle charging facilities), lockers and showers, to encourage bicycle commuting, and provision of free transit passes for hotel and club employees who commute via transit, will reduce vehicle trips and thereby enhance the pedestrian environment on all of the adjoining streets.

Table 5.0-3
Summary of the Extent to Which the Project Objectives are Met, Partially Met, or Not Met, by Each Alternative

Project Objectives	Alternative 1: No Project	Alternative 2: Reduced Excavation	Alternative 3: Zoning Compliant	Alternative 4: Reduced Height	Alternative 5: Reduced Project
Support and expand tourism and business activity by developing new lodging opportunities that are easily accessible to entertainment and commercial destinations in the City of Beverly Hills.	Not met	Met	Partially Met[1]	Met	Met
Provide short- and long-term employment opportunities and maximize transient occupancy tax revenue for the City through the development of a one-of-a-kind luxury hotel that will attract visitors to the Business Triangle and Beverly Hills	Not met	Met	Not Met	Not Met	Not Met
Reduce vehicular trips and promote local and regional mobility objectives by developing a hotel use with convenient access to a variety of alternative transportation options including walking, biking, and public transit, and in close proximity to popular tourist destinations.	Not met	Met	Partially Met	Met	Not Met
Replace existing uses and structures with economically viable and aesthetically attractive development on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.	Not met	Met	Not Met	Not Met	Not Met
Improve the pedestrian experience and enhance walkability through a pedestrian friendly design that includes pedestrian amenities at ground level.	Not met	Met	Not Met	Not Met	Not Met
To accommodate vehicle flow on adjacent City streets and promote multiple transportation modes (walking, bicycling) by relocating	Not met	Met	Not Met	Met	Partially Met

[1] *Alternative 2 provides 36 hotel rooms, as compared to the Project's up-to 115 hotel rooms, and therefore meets this objective to a lesser extent than the Project.*

Table 5.0-3 (Continued)
Summary of the Extent to Which the Project Objectives are Met, Partially Met, or Not Met, by Each Alternative

Project Objectives	Alternative 1: No Project	Alternative 2: Reduced Excavation	Alternative 3: Zoning Compliant	Alternative 4: Reduced Height	Alternative 5: Reduced Project
the alley bisecting the Project Site, placing parking underground, limiting driveway access points, and enhancing the pedestrian environment on all of the adjoining streets.					

5.0.4 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:

- **Residential Development Alternative:** The City considered but rejected a Residential Development Alternative. Specifically, residential uses would be incompatible with the current C-3 commercial zoning of the Project Site as well as with adjacent commercial uses. Furthermore, a Residential Development Alternative may result in greater environmental impacts, particularly with regard to an increased demand for public services. Additionally, a Residential Development Alternative would not meet the underlying purpose or any of the objectives of the Project. Due to these reasons listed above, a Residential Development Alternative was rejected as infeasible and eliminated from further consideration.

- **Alternative Project Site:** The underlying purpose and objectives of the Project are intimately tied to the existing Project Site. In particular, the Project Site was selected for its prime location within the City of Beverly Hills Business Triangle, in proximity to other compatible commercial uses. Both the Project, as well as the existing commercial uses in proximity to the Project Site, would benefit from the Project being built in this location.

Further, the results of a search to find a similar alternative site on which the Project could be built determined that suitable similar locations are not available. There are no other sites that achieve the purpose and objectives of the Project to revitalize the Project

Site by developing a high quality hotel development project that provides new lodging opportunities within the City's central business district to serve the region and tourists as well as publicly accessible restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site. Additionally, an alternative site would not necessarily eliminate any of the Project's less than significant and less than significant with mitigation impacts and could actually result in additional environmental impacts beyond those associated with the Project. "The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location." (CEQA Guidelines Section 15126.6(f)(2)(A).) Thus, in accordance with Section 15126.6(f) of the State CEQA Guidelines, this alternative was rejected from further consideration.

5.0.5 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 than, similar to, or greater than the corresponding impacts of the Project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section 2.0, Project Description, of this Final EIR, would be substantially attained by the alternative.[2] The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative are determined for each environmental issue area analyzed in Section 4.0, Environmental Impact Analysis, of this Final EIR, assuming that the alternative would implement the same project design features and mitigation measures identified in Section 4.0, Environmental Impact Analysis, of this Final EIR, as applicable.

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

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

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

- 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 5.0-4 on page 5.0-13.

Table 5.0-4
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Excavation and Reduced Parking Alternative	Alternative 3: Zoning Compliant Alternative	Alternative 4: Reduced Height Alternative	Alternative 5: Reduced Project Alternative
A. AIR QUALITY						
Regional Emissions						
Construction	Less Than Significant Impact	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Localized Emissions						
Construction	Less Than Significant Impact	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Toxic Air Contaminants						
Construction	Less Than Significant Impact	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)

Table 5.0-4 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Excavation and Reduced Parking Alternative	Alternative 3: Zoning Compliant Alternative	Alternative 4: Reduced Height Alternative	Alternative 5: Reduced Project Alternative
B. BIOLOGICAL RESOURCES						
Biological Resources	Less Than Significant Impact with Mitigation	Less (No Impact)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)
C. CULTURAL RESOURCES						
Historical Resources	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Archaeological Resources	Less Than Significant Impact with Mitigation	Less (No Impact)	Less (Less Than Significant Impact with Mitigation)	Less (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Less (Less Than Significant Impact with Mitigation)
D. ENERGY						
Wasteful, inefficient, or unnecessary consumption of Energy Resources						
Construction	Less Than Significant Impact	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant Impact	Greater (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)

Table 5.0-4 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Excavation and Reduced Parking Alternative	Alternative 3: Zoning Compliant Alternative	Alternative 4: Reduced Height Alternative	Alternative 5: Reduced Project Alternative
Conflict with Plans for Renewable Energy or Energy Efficiency	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
E. GEOLOGY AND SOILS (PALEONTOLOGICAL RESOURCES)						
Paleontological Resources	Less Than Significant Impact With Mitigation	Less (No Impact)	Less (Less Than Significant Impact with Mitigation)	Less (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Less (Less Than Significant Impact with Mitigation)
F. GREENHOUSE GAS EMISSIONS						
Greenhouse Gas Emissions	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
G. LAND USE AND PLANNING						
Conflict with Land Use Plans	Less Than Significant Impact	Less (No Impact)	Greater (Less Than Significant Impact)	Less (Less Than Significant Impact)	Greater (Potentially Significant Impact)	Greater (Potentially Significant Impact)
H. NOISE						
Construction						
On-Site Noise	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)

Table 5.0-4 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Excavation and Reduced Parking Alternative	Alternative 3: Zoning Compliant Alternative	Alternative 4: Reduced Height Alternative	Alternative 5: Reduced Project Alternative
Off-Site Noise	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
On-Site Vibration (Building Damage)	Less Than Significant Impact with Mitigation	Less (No Impact)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)
On-Site Vibration (Human Annoyance)	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Operation						
On-Site Noise	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)
Off-Site Noise	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Vibration	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
I. TRANSPORTATION						
Conflict with Plans (Construction)	Less Than Significant Impact with Mitigation	Less (No Impact)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)

Table 5.0-4 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Excavation and Reduced Parking Alternative	Alternative 3: Zoning Compliant Alternative	Alternative 4: Reduced Height Alternative	Alternative 5: Reduced Project Alternative
Conflict with Plans (Operation)	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Vehicle Miles Traveled	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Hazardous Design Features	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
Emergency Access	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Similar (Less Than Significant Impact)
J. TRIBAL CULTURAL RESOURCES						
Tribal Cultural Resources	Less Than Significant Impact With Mitigation	Less (No Impact)	Less (Less Than Significant Impact with Mitigation)	Less (Less Than Significant Impact with Mitigation)	Similar (Less Than Significant Impact with Mitigation)	Less (Less Than Significant Impact with Mitigation)
K. UTILITIES AND SERVICE SYSTEMS						
Energy Infrastructure						
Construction	Less Than Significant Impact	Less (No Impact)	Less (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)
Operation	Less Than Significant Impact	Less (No Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)	Similar (Less Than Significant Impact)	Less (Less Than Significant Impact)

Table 5.0-4 (Continued)
Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Impact Area	Project	Alternative 1: No Project Alternative	Alternative 2: Reduced Excavation and Reduced Parking Alternative	Alternative 3: Zoning Compliant Alternative	Alternative 4: Reduced Height Alternative	Alternative 5: Reduced Project Alternative

Source: Eyestone Environmental, 2022.

5.0 Alternatives

5.1 Alternative 1: No Project Alternative

5.1.1 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 a proposed project does not proceed. CEQA Guidelines Section 15126.6(e)(3)(B) states 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 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. Under Alternative 1, the Project Site would continue to be developed with the existing commercial and institutional buildings comprising approximately 56,787 square feet and surface and underground parking spaces. Specifically, 456 North Rodeo Drive would continue to be developed with a two-story, 6,895-square-foot commercial structure and nine surface parking spaces, 468 North Rodeo Drive would continue to be developed with a two-story, 20,265-square-foot commercial structure and six surface parking spaces, 461–465 North Beverly Drive would continue to be developed with a two-story, 23,351-square-foot institutional use and five surface and 45 underground parking spaces, and 449, 451, and 453 North Beverly Drive would continue to be developed with a one-story, 6,276-square-foot commercial structure.

As detailed in Section 2.0, Project Description, of this Final EIR, the buildings within the Project Site have been occupied by a variety of commercial and institutional tenants over the years and one or more of the existing on-site buildings have been vacant for a period of time over the years. As further described in Section 2.0, Project Description, of this Final EIR, as of the writing of this Final EIR, the existing structure at 468 North Rodeo Drive and the existing structure at 449, 451, and 453 North Beverly Drive are vacant. However, for purposes of this analysis, it is assumed that the No Project Alternative includes all buildings being occupied by uses that have historically occupied the Project Site and which are permitted by the existing zoning.

5.1.2 Environmental Impacts

5.1.2.1 Air Quality

5.1.2.1.1 Regional Emissions

5.1.2.1.1.1 Construction

Alternative 1 would not remove the existing buildings or require any construction activities on the Project Site except for any primarily internal tenant improvements that may occur as the buildings transition from tenant to tenant, internal improvements are made associated with changing exhibitions for the existing structure at 461–465 North Beverly Drive, which is currently leased to an art exhibitor, or in connection with transitioning a space from vacancy. In retail spaces such as the majority of the structures within the Project Site, tenant improvements could include the installation of flooring, cabinetry, painting, walls to separate spaces, breakrooms, etc. These improvements could also apply to the institutional use as the space evolves from exhibit to exhibit or to different leaseholders in the future. Notwithstanding, such improvements would not use large pieces of construction equipment such as those for an entirely new development where existing buildings are demolished, and completely new structures are constructed, as the existing buildings would remain and improvements would be made internally. Therefore, Alternative 1 would not result in construction emissions associated with use of heavy-duty construction equipment, construction truck traffic, or fugitive dust from demolition and excavation. Construction emissions could occur from construction workers traveling to the Project Site and from delivery trucks. However, this is typical of the existing on-site structures and is a condition that has historically occurred within the Project Site as new tenants have leased the various spaces within the Project Site. Such construction emissions would not be a new source of emissions that would be introduced to the Project Site and would be expected to occur through the life of the existing structures. Therefore, construction-related regional air quality impacts would not occur as part of Alternative 1, and Alternative 1 would avoid the less than significant impacts of the Project associated with regional emissions. 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.

5.1.2.1.1.2 Operation

As discussed above, the buildings within the Project Site have been occupied by a variety of commercial and institutional tenants over the years and one or more of the existing on-site buildings have been vacant for a period of time over the years. However, for purposes of this analysis, it is assumed that the No Project Alternative includes all buildings being occupied by uses that have historically occupied the Project Site and which are permitted by the existing zoning. While two of the existing buildings that have been

historically occupied by commercial uses are currently vacant, this condition of vacancy and fully occupied retail spaces is a cycle that occurs in commercial and institutional spaces such as those on the Project Site and is not a new condition. Notwithstanding, Alternative 1 would not include the construction of new structures that could expand the building area on the Project Site and result in increased operations. Therefore, 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 can generated by the amount of development existing within the Project Site. Therefore, Alternative 1 would not result in new or additional operational air quality impacts associated with regional emissions. 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.

5.1.2.1.2 Localized Emissions

5.1.2.1.2.1 Construction

As previously discussed, Alternative 1 would not result in any construction emissions associated with construction truck traffic, fugitive dust from demolition and excavation, or the use of heavy-duty construction equipment. In addition, construction emissions associated with construction workers and delivery trucks would be limited based on the internal nature of improvements. Such emissions are typical of the structures on the Project Site and have historically occurred and will continue to occur through the life of the on-site buildings. Therefore, no new or additional construction-related localized air quality impacts would occur on the Project Site. 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.

5.1.2.1.2.2 Operation

As described above, 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 generated by the existing building area available within the Project Site. Therefore, Alternative 1 would not result in operational air quality impacts associated with localized emissions, and such impacts would be less when compared to the less-than-significant impacts of the Project.

5.1.2.1.3 Toxic Air Contaminants

5.1.2.1.3.1 Construction

As previously described, Alternative 1 would not remove the existing buildings or require any construction activities on the Project Site except for any primarily internal

tenant improvements that may occur as the buildings transition from tenant to tenant, internal improvements associated with changing exhibitions for the existing structure at 461–465 North Beverly Drive are made, which is currently leased to an art exhibitor, or in connection with transitioning a space from vacancy over the years. Therefore, Alternative 1 would not result in construction emissions associated with use of heavy-duty construction equipment, construction truck traffic, or fugitive dust from demolition and excavation. Construction emissions could occur from construction workers and delivery trucks traveling to the Project Site. However, this is typical of the existing on-site structures and is a condition that has historically occurred within the Project Site as new tenants have leased the various spaces within the Project Site. Such construction emissions would not be a new source of emissions that would be introduced to the Project Site and would be expected to occur through the life of the existing structures. Therefore, the No Project Alternative would not result in new or increased construction-related diesel particulate emissions that could generate substantial toxic air contaminants (TACs), and no impacts associated with the release of TACs would occur under Alternative 1. As such, TAC impacts under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

5.1.2.1.3.2 Operation

The No Project Alternative would not result in new development or increased operations on the Project Site as no new floor area would be constructed. Therefore, no new increase in mobile source emissions and their associated TACs would occur. Therefore, the No Project Alternative would not result in operational impacts associated with TACs, and such impacts would be less when compared to the less-than-significant impacts of the Project.

5.1.2.2 Biological Resources

The No Project Alternative would not result in the removal of street trees adjacent to the Project Site. Therefore, there would be no potential for Alternative 1 to impact bats and their roosts. As such, no impacts to biological resources would occur, and impacts would be less when compared to the impacts of the Project, which would be less than significant with mitigation.

5.1.2.3 Cultural Resources

5.1.2.3.1 Historical Resources

As discussed in Section 4.3, Cultural Resources, of this Final EIR, the existing buildings on the Project Site do not qualify as historical resources. Therefore, there are no historical resources on the Project Site, and no direct impact to an historical resource could

occur. In addition, no demolition, grading, or other earthwork activities that could potentially affect adjacent or nearby historical resources would occur under the No Project Alternative, and no indirect impact would result. Therefore, impacts to historical resources would not occur under Alternative 1, and impacts would be less than the less-than-significant impacts of the Project.

5.1.2.3.2 Archaeological Resources

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

5.1.2.4 Energy

5.1.2.4.1 Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

5.1.2.4.1.1 Construction

As previously described, construction activities would not occur under the No Project Alternative except for tenant improvements that may be required to adapt the commercial spaces and institutional use to, respectively, new tenants or new exhibitions. This is a condition that has historically occurred and will continue to occur through the life of the existing structures. Such tenant improvements are primarily confined to the internal commercial space and necessitate the use of small, hand-powered tools that may require electricity to operate. However, as with the Project, when such tools are not needed they would be turned off to conserve power. Therefore, Alternative 1 would not result in the wasteful, inefficient, or unnecessary consumption of energy resources. Thus, construction-related impacts regarding the use of energy would not occur, and impacts under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

5.1.2.4.1.2 Operation

The No Project 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. It is noted however that the Project would replace existing older buildings with modern buildings incorporating the latest requirements regarding building energy efficiency, thereby improving the energy efficiency of uses within the Project Site. Therefore, operational impacts would be greater when compared to the less-than-significant impacts of the Project.

5.1.2.4.2 Conflict with Plans for Renewable Energy or Energy Efficiency

The No Project 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. Therefore, the No Project Alternative would not result in impacts related to renewable energy or energy efficiency plans, and impacts would be less when compared to the less-than-significant impacts of the Project.

5.1.2.5 Geology and Soils (Paleontological Resources)

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

5.1.2.6 Greenhouse Gas Emissions

As previously described above, Alternative 1 would not remove the existing buildings or require any construction activities on the Project Site except for any primarily internal tenant improvements that may occur as the buildings transition from tenant to tenant, or new exhibitions are installed, or from vacancy over the years. Therefore, Alternative 1 would not result in construction emissions associated with use of heavy-duty construction equipment, construction truck traffic, or fugitive dust from demolition and excavation. Construction emissions could occur from construction workers and delivery trucks traveling to the Project Site. However, this is typical of the existing on-site structures and is a condition that has historically occurred within the Project Site as new tenants have leased the various spaces within the Project Site's retail spaces and new exhibitions were mounted at the institutional use. Such construction emissions would not be a new source of emissions that would be introduced to the Project Site and would be expected to occur through the life of the existing structures. As such, the No Project Alternative would not develop new structures on the Project Site which could generate new or increased greenhouse gas (GHG) emissions. As such, impacts associated with GHG emissions under the No Project Alternative would be less when compared to the less-than-significant impacts of the Project.

5.1.2.7 Land Use and Planning

Under the No Project Alternative, there would be no changes to the physical or operational characteristics of the existing on-site structures or uses permitted. No land use approvals or permits would be required. Therefore, Alternative 1 would have no potential to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding

or mitigating an environmental effect. No impacts associated with a conflict with land use plans, policies, or regulations would occur, and impacts would be less than the less-than-significant impacts of the Project.

5.1.2.8 Noise

5.1.2.8.1 Construction

5.1.2.8.1.1 On- and Off-Site Noise During Construction

As discussed above, Alternative 1 would not remove the existing buildings or require any construction activities on the Project Site except for any primarily internal tenant improvements that may occur as the buildings transition from tenant to tenant, or new exhibitions are installed, or from vacancy over the years. Therefore, Alternative 1 would not result in noise from the use of heavy-duty construction equipment or construction haul and cement truck traffic. Noise generation could occur from the use of small, hand-powered construction tools and construction workers and delivery trucks traveling to the Project Site. However, this is typical of the existing on-site structures and is a condition that has historically occurred and will continue to occur within the Project Site as new tenants lease the various commercial and institutional spaces within the Project Site. Noise generated from these activities would primarily be confined to the internal commercial and institutional spaces and would not be a new source of noise that would be introduced to the Project 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, which would be less than significant for both on-site and off-site construction noise.

5.1.2.8.1.2 Vibration During Construction

As described in Section 4.8, Noise, of this Final EIR, construction activities can generate varying degrees of ground vibration, depending on the construction procedures and the type of construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. As discussed above, Alternative 1 would not remove the existing buildings or require any construction activities on the Project Site except for any primarily internal tenant improvements that may occur as the buildings transition from tenant to tenant, or new exhibitions are installed, or from vacancy over the years. Therefore, Alternative 1 would not result in vibration from the use of heavy-duty construction equipment or construction haul and cement truck traffic, which are the primary sources of vibration. During implementation of internal improvements, construction worker and delivery truck traffic could occur. However, this is typical of the existing on-site structures and is a condition that has historically occurred and will continue to occur within the Project Site as new tenants lease the various commercial and institutional spaces within the Project Site.

Any vibration generated from these activities would be typical of the on-site uses and would not be a new source of vibration that would be introduced to the Project Site. As such, no vibration impacts would occur under Alternative 1, and impacts would be less when compared to those of the Project. Project impacts would be less than significant with mitigation for on-site construction vibration (building damage) and less than significant for on-site construction vibration (human annoyance).

5.1.2.8.2 Operation

5.1.2.8.2.1 On- and Off-Site Noise During Operation

The No Project Alternative would not develop new buildings or expand existing uses on the Project Site such that site operations and associated noise would increase. As such, no noise impacts associated with operation of the Project Site as a result of Alternative 1 would occur, and impacts would be less when compared to the less-than-significant operational impacts of the Project.

5.1.2.8.2.2 Vibration During Operation

The No Project Alternative would not develop new buildings or parking areas on the Project Site such that new sources of vibration would be introduced. As such, no vibration impacts associated with operation of the Project Site as a result of Alternative 1 would occur, and impacts would be less when compared to the less-than-significant operational impacts of the Project.

5.1.2.9 Transportation

Since the No Project Alternative would not develop new or additional land uses on the Project Site, Alternative 1 would not generate any additional vehicle trips nor change the way visitors travel to the Project Site in terms of vehicle miles traveled. Existing access and circulation, including alley access and circulation, within the Project Site would also be maintained during operation. Therefore, Alternative 1 would not result in impacts with respect to construction traffic or operational traffic, including conflicts with programs, plans, ordinances, or policies addressing the circulation system; vehicle miles traveled (VMT); hazardous design features; and emergency access. Therefore, impacts under Alternative 1 would be less when compared to the Project, which would be less than significant and less than significant with mitigation regarding construction-related transportation impacts.

5.1.2.10 Tribal Cultural Resources

No grading and other earthwork activities would occur under the No Project Alternative. Therefore, there would be no potential for Alternative 1 to uncover subsurface

tribal cultural resources. As such, no impacts to tribal cultural resources would occur, and impacts would be less when compared to the impacts of the Project, which would be less than significant with mitigation.

5.1.2.11 Utilities and Service Systems (Energy Infrastructure)

As previously described, construction activities would not occur under the No Project Alternative except for tenant improvements that may be required to adapt the various commercial and institutional spaces to their specific needs. This is a condition that has historically occurred and will continue to occur through the life of the existing structures. Tenant improvements are primarily confined to the internal commercial spaces and necessitate the use of small, hand-powered tools that may require electricity to operate. However, as with the Project, when such tools are not being used they would be turned off to conserve power. In addition, the No Project Alternative would not include new uses or expand the area of the buildings on the Project Site such that site operations on the Project Site would increase. The existing buildings are also all currently served by existing infrastructure and would not require new connections to serve individual commercial or institutional spaces. Therefore, Alternative 1 would not increase the long-term energy demand on the Project Site. As such, no operation impacts related to energy infrastructure would occur under the No Project Alternative, and impacts would be less when compared to the less-than-significant impacts of the Project.

5.1.3 Comparison of Impacts

As analyzed above, under Alternative 1, the Project Site would continue to be developed with the same commercial and institutional buildings comprising approximately 56,787 square feet and surface and underground parking spaces. As detailed in Section 2.0, Project Description, of this Final EIR, the buildings within the Project Site have been occupied by a variety of commercial and institutional uses over the years and one or more of the existing on-site buildings have been vacant for a period of time over the years. However, for purposes of this analysis, it is assumed that the No Project Alternative includes all buildings being occupied by uses that have historically occupied the Project Site and which are permitted by the existing zoning. While the cycle of vacancy and occupancy would continue through the life of the existing structures, the No Project Alternative would not construct new structures or expand existing structures such that site operations would increase. As such, the No Project Alternative would not result in significant impacts with regard to any of the environmental topics evaluated herein and, the No Project Alternative would eliminate the Project's less than significant impacts and less than significant with mitigation impacts.

5.1.4 Relationship of the Alternative to Project Objectives

Under the No Project Alternative, the existing uses would remain on the Project Site and no new development would occur. As such, the No Project Alternative would not revitalize the Project Site as the existing uses to remain do not include lodging opportunities, restaurant or bar uses. Therefore, Alternative 1 would not meet the underlying purpose of the Project or the Project objectives. Specifically, Alternative 1 would not meet any of the following Project objectives:

- Support and expand tourism and business activity by developing new lodging opportunities that are easily accessible to entertainment and commercial destinations in the City of Beverly Hills.
- Provide short- and long-term employment opportunities and maximize transient occupancy tax revenue for the City through the development of a one-of-a-kind luxury hotel that will attract visitors to the Business Triangle and Beverly Hills.
- Reduce vehicular trips and promote local and regional mobility objectives by developing a hotel use with convenient access to a variety of alternative transportation options including walking, biking, and public transit, and in close proximity to popular tourist destinations.
- Replace existing uses and structures with an economically viable and aesthetically attractive development on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.
- Improve the pedestrian experience and enhance walkability through a pedestrian friendly design that includes pedestrian amenities at ground level.
- To accommodate vehicle flow on adjacent City streets and promote multiple transportation modes (walking, bicycling) by relocating the alley bisecting the Project Site, placing parking underground, limiting driveway access points, and enhancing the pedestrian environment on all of the adjoining streets.

Overall, the No Project Alternative would not meet the Project's underlying purpose to revitalize the Project Site by developing a high quality hotel development project that provides new lodging opportunities within the City to serve the region and tourists as well as publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site.

5.0 Alternatives

5.2 Alternative 2: Reduced Excavation and Reduced Parking Alternative

5.2.1 Description of the Alternative

Alternative 2, the Reduced Excavation and Reduced Parking Alternative, would develop the Project Site similar to the Project except with regard to the number of subterranean parking levels provided. Specifically, Alternative 2 would eliminate the third subterranean parking level proposed as part of the Project. Overall, like the Project, Alternative 2 would allow for up to 220,950 square feet of floor area with up to 115 hotel guest rooms under the Specific Plan maximum with an above-ground FAR of 3.91:1 and total FAR of 4.2:1.

Similar to the Project, the proposed hotel building would vary in height from four stories and a maximum height of 51 feet along North Rodeo Drive to nine stories with a maximum height of 115 feet along North Beverly Drive. The overall design of the building under Alternative 2, including architectural features, lighting and signage, and sustainability, would be similar to that of the Project. Alternative 2 would also feature similar vehicular, pedestrian, and bicycle access as the Project.

Parking would be provided in two subterranean levels (a reduction of one subterranean level when compared to the Project's three proposed subterranean levels) with a total of 117 parking spaces (a reduction of ~~61~~68 parking spaces when compared to the Project's proposed ~~178~~185 parking spaces). As with the Project, primary access to the building and parking would be from South Santa Monica Boulevard from a valet motor court. The existing alley that runs north-south and is currently accessed from South Santa Monica Boulevard would be removed and relocated to the southern portion of the Project Site. The new access point to the alley would be from the west side of North Beverly Drive.

As with the Project, the proposed valet motor court on South Santa Monica Boulevard under Alternative 2 would be used for drop-off and pick-up for hotel guests and club members as well as spa, retail, and restaurant patrons. Employee and valet driven vehicles would enter Alternative 2's subterranean parking from the relocated alley off North Beverly Drive. Employees and delivery vans would enter and exit the subterranean parking through the relocated alley. Valet driven vehicles would return from the subterranean parking garage to the motor court via ground level on-site internal circulation.

As with the Project, primary pedestrian access to the Project Site under Alternative 2 would be provided through the hotel entrance along South Santa Monica Boulevard. A club member lobby at the ground level would provide secondary pedestrian access from North Beverly Drive; however, club members arriving at the motor court by vehicle would access the club member lobby by an internal corridor accessed off the hotel lobby. Retail spaces along North Rodeo Drive would have separate pedestrian access points from the sidewalk along the street. The primary access to the ground floor restaurant would occur through the hotel lobby/motor court area. Additional ancillary pedestrian restaurant access points may be provided on South Santa Monica Boulevard and/or North Beverly Drive.

As with the Project, Alternative 2 would provide a variety of open space comprising approximately 45,201 square feet and recreational amenities on-site for hotel guests and visitors. This includes the publicly-accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, the 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven, and the 742-square-foot outdoor terrace on the seventh level. The remaining open space area would be for private use by hotel guests and club members and would include hotel room balcony/patio areas, hotel pool deck, wellness center outdoor area, and penthouse pool deck. Additionally, similar to the Project, Alternative 2 would include landscaping throughout the Project Site, including a variety of palms, shrubs, perennials, groundcovers, and vines. Furthermore, similar to the Project, Alternative 2 would increase the number of trees on-site from zero to 7 trees, and replace the 15 street trees adjacent to the Project Site on a 1:1 basis, for a combined total of 22 trees.

As with the Project, construction of Alternative 2 would also occur in phases, with construction anticipated to commence in 2022 and buildout completed by 2026. However, as Alternative 2 would remove one level of subterranean parking under the building, Alternative 2 would result in a reduction in excavation and export compared to the Project. As such, construction activities and the construction period would be reduced compared to the Project. Similar to the Project, construction activities would include demolition of existing uses, grading and excavation, and construction of a new structure and related infrastructure. Due to the elimination of the third subterranean parking level, the total depth of excavation required for Alternative 2 would be reduced as compared to the Project. Specifically, excavation for the two proposed subterranean levels under Alternative 2 would extend to a depth of approximately 35 feet (a reduction of nine feet when compared to the Project's proposed 44 feet of excavation). Consequently, soil export for Alternative 2 would be reduced as compared to the Project, and would include 99,369 cubic yards of exported soil (a reduction of 25,551 cubic yards when compared to the Project's proposed 124,920 cubic yards of exported soil). Between the hours of 7:00 P.M. to 10:00 P.M., the designated outbound (leaving the Project Site) haul route is anticipated to be from the Project Site to

eastbound South Santa Monica Boulevard to Burton Way to San Vicente Boulevard to southbound La Cienega Boulevard to Interstate 10. The reverse of this route would be used for inbound truck traffic from 7:00 P.M. to 10:00 P.M. Between the hours of 10:00 P.M. to 7:30 A.M., the designated outbound haul route is anticipated to be from the Project Site to southbound Beverly Drive to eastbound Wilshire Boulevard to southbound La Cienega Boulevard. Between the hours of 10:00 P.M. to 7:30 A.M., the inbound haul route would be from Interstate 10 to northbound La Cienega Boulevard to westbound Wilshire Boulevard to northbound North Camden Drive to eastbound South Santa Monica Boulevard to the Project Site. It is noted that intermittent lane closures associated with construction of the future Metro D (formerly Purple) Line Rodeo Station are anticipated to occur on Beverly Drive through 2024. When periodic lane closures associated with the Metro station construction occur on Beverly Drive and/or Wilshire Boulevard, the nighttime haul trucks would utilize the evening (7:00 P.M. to 10:00 P.M.) haul route described above. Alternative 2 would require the same discretionary entitlements as the Project.

5.2.2 Environmental Impacts

5.2.2.1 Air Quality

5.2.2.1.1 Regional Emissions

5.2.2.1.1.1 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 4.1, Air Quality, of this Final 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 activities would be reduced in comparison to the Project due to the reduction in excavation activities. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Therefore, as with the Project, total contributions to regional air pollutant emissions during construction of Alternative 2 would also be less than significant. However, with the reduction of excavation activities and subsequent reduction of haul trips, such impacts would be less than the less-than-significant impacts of the Project.

5.2.2.1.1.2 Operation

As with the Project, operational regional air pollutant emissions associated with Alternative 2 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As previously discussed, Alternative 2 would only eliminate one level of subterranean parking compared to the Project, while still adding the same floor area as the Project. As such, the number of net new daily vehicle trips generated by Alternative 2 would be the same as the net new daily vehicle trips generated by the Project. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 2 would be similar to the emissions generated by the Project. In addition, both area sources and stationary sources would also generate on-site operational air emissions similar to the Project. Therefore, under Alternative 2, total contributions to regional air pollutant emissions during operation would be similar to the Project's contribution. Thus, impacts to regional air quality under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

5.2.2.1.2 Localized Emissions

5.2.2.1.2.1 Construction

As Alternative 2 would develop the Project Site similar to the Project and construct the proposed building within the same footprint as the Project, construction activities associated with Alternative 2 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 2 would also be similar to those of the Project. Therefore, as with the Project, localized impacts under Alternative 2 would be less than significant. However, with the reduction of excavation activities and subsequent reduction of haul trips, such impacts would be less than the less-than-significant impacts of the Project.

5.2.2.1.2.2 Operation

Localized operational impacts are determined primarily by traffic volumes. As discussed above, the number of net new daily trips generated by Alternative 2 would be similar to the Project as Alternative 2 would include the same floor area as the Project. In addition, as with the Project, Alternative 2 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 2 also would be less than significant and similar to the less-than-significant impacts of the Project.

5.2.2.1.3 Toxic Air Contaminants

5.2.2.1.3.1 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 4.1, Air Quality, of this Final 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 those of the Project since excavation activities and subsequent haul trips required during construction of Alternative 2 would be reduced. As with the Project, the construction phases which require the most heavy-duty diesel vehicle usage, such as site grading, would last for a short duration. Thus, construction of Alternative 2 also would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. Thus, impacts due to TAC emissions under Alternative 2 would be less than significant and less than the less-than-significant impacts of the Project.

5.2.2.1.3.2 Operation

As set forth in Section 4.1, Air Quality, of this Final EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 2, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be similar to the Project since the same uses proposed by the Project would be constructed as part of Alternative 2. 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, and impacts would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

5.2.2.2 Biological Resources

As with the Project, Alternative 2 would require the removal of 15 street trees that would be replaced at a 1:1 basis. As discussed in Section 4.2, Biological Resources, of this Final EIR, based on the results of the daytime bat habitat assessment and survey, there is marginal roosting habitat for bats in the 15 street trees lining the sidewalks and no suitable habitat in the on-site buildings. Because the 12 palm street trees appear to provide marginal bat roosting habitat, impacts to bats and roosts could be potentially significant under the Project, including through interference with the movement of bat species. Therefore, as with the Project, Alternative 2 also has the potential to impact bats and roosts, including through interference with the movement of bat species due to removal of the 15 street trees lining the sidewalks. However, Alternative 2 would implement the same mitigation measures as the Project in order to mitigate potential impacts to bats and

roosts to a less than significant level. Therefore, the potential for direct impacts to biological resources as a result of removal of the street trees would be less than significant with mitigation under this alternative and such impacts would be similar to the Project.

5.2.2.3 Cultural Resources

5.2.2.3.1 Historical Resources

As with the Project, Alternative 2 would require demolition of the existing buildings. As determined in the Historic Resource Assessment Reports included in Appendix D of this Final EIR, the existing on-site buildings do not qualify as historical resources. Therefore, the potential for direct impacts to historical resources as a result of removal of the existing buildings on-site would also be less than significant under this alternative.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 2 also has the potential to indirectly impact one historical resource located across the street from the Project Site, the Writers and Artists Building at 9507 S. Santa Monica Boulevard, due to potential structural vibration and settlement as a result of on-site vibration generated during construction of this alternative. However, as provided in Section 4.8, Noise, of this Final EIR, the estimated vibration velocity levels from all construction equipment would be well below the building damage significance threshold for the Writers and Artists Building. While Alternative 2 would remove one level of subterranean parking and result in an associated reduction in excavation and related construction activities, peak construction activities would be similar to the Project. As such, Alternative 2 would similarly not result in a significant indirect impact to historical resources in the vicinity of the Project Site. Therefore, the potential for indirect impacts on adjacent historical resources would be less than significant under Alternative 2, and such impacts would be similar to the Project.

5.2.2.3.2 Archaeological Resources

As previously discussed, Alternative 2 would eliminate one of the three levels of subterranean parking proposed by the Project. The existing maximum depth of disturbance at the Project Site is associated with one subterranean level at 461 N. Beverly Drive. Therefore, Alternative 2 would still involve excavation within previously undisturbed soil. However, the elimination of one subterranean level proposed by the Project would also result in less excavation, and therefore the potential for uncovering unknown archaeological resources would also be reduced, as the amount of excavation correlates with the opportunity to uncover such resources. Nevertheless, Alternative 2 would implement the same mitigation measure as the Project in order to mitigate potential impacts to archaeological resources. Overall, similar to the Project, potential impacts to archaeological resources would be less than significant with mitigation. However, such

impacts would be less than those of the Project due to the reduction in excavation activities under Alternative 2.

5.2.2.4 Energy

5.2.2.4.1 Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

5.2.2.4.1.1 Construction

Similar to the Project, construction activities associated with Alternative 2 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. As with the Project, Alternative 2 would also generate a demand for transportation energy associated with on- and off-road vehicles. Like the Project, construction activities associated with Alternative 2 would not involve the consumption of natural gas. The energy consumed during construction of Alternative 2 would be less than that of the Project due to the reduction in excavation related construction activities. As with the Project, the electricity demand during construction of Alternative 2 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 2 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 2 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities energy use would not be 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 of the Project.

5.2.2.4.1.2 Operation

As with the Project, operation of Alternative 2 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As described above, Alternative 2 would result in a similar amount of total floor area as the Project. Accordingly, the number of daily trips under Alternative 2 would be the same as for the Project. Therefore, the consumption of electricity, natural gas, and petroleum-based fuels would be similar to the Project. Like the Project, Alternative 2 would implement design features to reduce energy usage. 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.

5.2.2.4.2 Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section 4.4, Energy, of this Final EIR, the current City of Beverly Hills Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 2 would comply with the City's Green Building Code, as well as be capable of achieving at least LEED® ~~Silver~~ Gold equivalent status, which include conservation features to reduce natural gas usage. Therefore, similar to the Project, Alternative 2 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 2 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Therefore, as with the Project, 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.

5.2.2.5 Geology and Soils (Paleontological Resources)

As described above, Alternative 2 would eliminate one of the three levels of subterranean parking proposed by the Project. The existing maximum depth of disturbance at the Project Site is associated with one subterranean level at 461 N. Beverly Drive. Therefore, Alternative 2 would still involve excavation within previously undisturbed soil. However, the elimination of one subterranean level proposed by the Project would also result in less excavation, and therefore the potential for uncovering paleontological artifacts that were not recovered during prior construction or other human activity would be reduced compared to the Project, as the amount of excavation correlates with the opportunity to uncover such resources. Nevertheless, Alternative 2 would implement the same mitigation measures as the Project in order to mitigate potential impacts to paleontological resources to a less than significant level. Overall, similar to the Project, potential impacts to paleontological resources would be less than significant with mitigation. However, such impacts would be less than the less-than-significant with mitigation impacts of the Project due to the reduction in excavation activities under Alternative 2.

5.2.2.6 Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As

previously discussed, the number of daily trips as well as the amount of energy required by Alternative 2 would be similar to the Project due to the development of the same uses and total floor area as the Project. Thus, the amount of GHG emissions generated by Alternative 2 would be similar to the amount generated by the Project. As with the Project, Alternative 2 would be designed to comply with the requirements of the CALGreen Code and the Beverly Hills Green Building Code. Alternative 2 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED ~~Silver~~ Gold or equivalent green building standards. With compliance with the CALGreen Code and the Beverly Hills Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 2 also would not conflict with any applicable plan, policy, regulation, or recommendation to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 2 would be less than significant and similar to the less-than-significant impacts of the Project.

5.2.2.7 Land Use and Planning

As previously described, Alternative 2 would develop the Project Site similar to the Project and with the same uses and floor area as the Project as well as include the same discretionary entitlements as the Project. However, with the reduction in excavation, the number of parking spaces provided by this alternative would be reduced and would be less than the projected demand for the proposed uses. Specifically, based on the same uses and floor area as the Project, the projected parking demand for Alternative 2 would also be 157 vehicle parking spaces.

Because this alternative would provide a total of 117 parking spaces, which would be included as part of the specific plan for this alternative, Alternative 2 would not meet the projected peak demand of the proposed uses, and this alternative's specific plan would not provide for the adequate number of parking spaces to meet projected demand. As noted in Section 4.7, Land Use and Planning, of this Final EIR, per Section 21099 (d)(1) of the Public Resources Code (PRC), a project's parking impacts shall not be considered a significant impact on the environment if 1) the project is a residential, mixed-use residential, or employment center project, and 2) the project is located on an infill site within a transit priority area. Both of these conditions apply to the Project and Alternative 2. Therefore, while this conflict regarding the number of parking spaces provided in and of itself would not result in a significant land use impact, impacts related to conflicts with land use plans under Alternative 2 would be greater than the less-than-significant impacts of the Project; however, such impacts would continue to be less than significant under Alternative 2.

5.2.2.8 Noise

5.2.2.8.1 Construction

5.2.2.8.1.1 On- and Off-Site Noise During Construction

The types of construction activities under Alternative 2 would be similar to the Project, although the amount of excavation activities and associated subterranean parking construction would be reduced due to the elimination of one subterranean parking level. 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. While the overall duration and amount of construction may be reduced under Alternative 2, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to the Project during maximum (peak) activity days. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project, although such noise levels may be experienced over a slightly shorter duration compared to the Project. Alternative 2 would comply with the same applicable regulatory requirements and implement similar design features as the Project to reduce noise levels during construction. Therefore, as with the Project, on-site and off-site construction noise impacts would be less than significant. Overall, construction-related noise impacts under Alternative 2 would be similar to those of the Project.

5.2.2.8.1.2 Vibration During Construction

As noted above, the types of construction activities under Alternative 2 would be similar to the Project, although construction activities would be reduced due to the elimination of one level of subterranean parking. As with the Project, construction of Alternative 2 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 during maximum (peak) construction activity days. As such, vibration levels during maximum construction activity days, which are used for measuring impact significance, would be similar to those of the Project, although the duration that such vibration would be experienced would be less compared to the Project. Alternative 2 would also implement similar design features and mitigation measure as the Project to reduce on-site vibration levels during construction. As such, vibration impacts due to on-site construction activities under Alternative 2 would similarly be less than significant with mitigation for on-site construction vibration (building damage) and less than significant for on-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 2 would be similar to the impacts of the Project.

5.2.2.8.2 Operation

5.2.2.8.2.1 On- and Off-Site Noise During Operation

As discussed in Section 4.8, Noise, of this Final EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as outdoor mechanical equipment, activities at or within the proposed outdoor spaces, parking facilities, and loading dock; 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. Due to the development of the same uses as the Project, the noise levels generated during Alternative 2 would be anticipated to be similar to the noise levels of the Project. Thus, operational on-site noise impacts would be less than significant and similar to the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 2 would generate a similar amount of daily vehicle trips as the Project. As such, Alternative 2 would result in similar off-site traffic-related noise levels as the Project. Therefore, as with the Project, off-site noise impacts under Alternative 2 would be less than significant and such impacts would be similar to those of the Project.

5.2.2.8.2.2 Vibration During Operation

As discussed in Section 4.8, Noise, of this Final EIR, sources of vibration related to operation under the Project would include (a) vehicle circulation, (b) delivery trucks, and (c) building mechanical equipment. Vehicular-induced vibration, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. Building mechanical equipment installed as part of the Project would include typical commercial-grade stationary mechanical equipment, which would include vibration-attenuation mounts to reduce vibration transmission so vibration would not be perceptible at the off-site sensitive receptors.

Alternative 2 would introduce vibration from similar vibration sources as the Project. Due to the development of the same uses as the Project, the vibration levels generated during Alternative 2 would be anticipated to be similar to the vibration levels of the Project. Thus, operational vibration impacts would be less than significant and similar to the less-than-significant impacts of the Project.

5.2.2.9 Transportation

As discussed above, Alternative 2 would be developed within the same Project Site as the Project; therefore, the plans, policies, and programs applicable to the Project would also apply to Alternative 2.

With regard to construction, the types of construction activities under Alternative 2 would be similar to the Project, although the amount of excavation activities and associated subterranean parking construction would be reduced due to the elimination of one subterranean parking level. As with the Project, construction of Alternative 2 would generate construction-related traffic from haul trucks and construction workers and would also require the delivery and staging of construction and materials and equipment. As such, similar to the Project, potential construction-related transportation impacts could also result during construction of Alternative 2. While the overall duration and amount of construction may be reduced under Alternative 2, construction activities and the associated construction traffic levels would be expected to be similar to the Project during maximum (peak) activity days. As such, transportation-related impacts during construction would be similar to those of the Project, although such impacts may be experienced over a shorter duration compared to the Project. Alternative 2 would also implement similar mitigation as the Project to reduce potential construction-related transportation impacts to a less-than-significant level. Therefore, as with the Project, construction-related transportation impacts would be less than significant with mitigation, similar to those of the Project.

As discussed above, Alternative 2 would include the same uses as the Project but would eliminate the third level of subterranean parking proposed by the Project. In total, Alternative 2 would reduce the number of new parking spaces provided as part of the Project by approximately ~~61~~68 spaces. Overall, as with the Project, Alternative 2 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 2 would be consistent with the City of Beverly Hills General Plan, the City's Complete Streets Plan, the LA Metro First Last Mile Strategic Plan, and the SCAG RTP/SCS. Similar to the Project, Alternative 2 would improve the streetscape and promote pedestrian activity and reduce vehicle trips and VMT by encouraging the use of alternative modes of transportation; providing convenient and adequate bicycling facilities; and enhancing pedestrian amenities along the streets surrounding the Project Site. As such, Alternative 2 would comply with the programs and policies set forth in the City of Beverly Hills General Plan, the City's Draft Complete Streets Plan, and the LA Metro First Last Mile Strategic Plan, and the SCAG RTP/SCS, to the same extent as the Project. Therefore, Alternative 2 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, similar to the Project, Alternative 2 meets Screening Criteria 2 and Screening Criteria 4 discussed in detail in Section 4.9, Transportation, of this Final EIR. Based on the screening criteria, Alternative 2 would have a less than significant VMT impact and is screened out from further VMT analysis. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be similar to the less-than-significant impacts of the Project.

As with the Project, Alternative 2 would not introduce hazardous design features such as sharp curves or hazardous uses. In addition, as with the Project, relocation of the alley to provide access from North Beverly Drive would not substantially increase hazards or result in an incompatible use. Thus, impacts related to increased hazards due to a design feature or incompatible uses would continue to be less than significant under Alternative 2 and such impacts would be similar to the less than significant impacts of the Project.

With regard to emergency access, during construction of Alternative 2, travel lanes would be maintained in both directions in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access, similar to the Project. During operation, Alternative 2 also would not involve the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, like the Project, Alternative 2 would comply with Beverly Hills Fire Department access requirements and applicable Beverly Hills Fire Department regulations regarding safety. Therefore, Alternative 2 also would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts regarding inadequate emergency access would be less than significant, and similar to the less than significant impacts of the Project.

5.2.2.10 Tribal Cultural Resources

As noted above, Alternative 2 would eliminate one of the three levels of subterranean parking proposed by the Project. The existing maximum depth of disturbance at the Project Site is associated with one subterranean level at 461 N. Beverly Drive. Therefore, Alternative 2 would still involve excavation within previously undisturbed soil. However, the elimination of one subterranean level proposed by the Project would also result in less excavation, and therefore the potential for Alternative 2 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project, as the amount of excavation correlates with the opportunity to uncover such resources. In addition, as discussed in Section 4.10, Tribal Cultural Resources, of this Final EIR, no known recorded tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site. Nevertheless, Alternative 2 would implement the same mitigation measures as the Project in order to mitigate potential

impacts to tribal cultural resources to a less than significant level. Overall, similar to the Project, potential impacts to tribal cultural resources would be less than significant with mitigation. However, such impacts would be reduced compared to the Project due to the reduction in excavation activities under Alternative 2. Therefore, impacts to tribal cultural resources would be less than the less-than-significant with mitigation impacts of the Project.

5.2.2.11 Utilities and Service Systems (Energy Infrastructure)

5.2.2.11.1 Construction

As discussed above, Alternative 2 would reduce the amount of energy needed for construction activities based on the reduction in excavation. As discussed in Section 4.11, Utilities and Service Systems—Energy Infrastructure, of this Final EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 2 would generate a reduced demand for energy during construction compared to the Project, the energy demand of Alternative 2 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity would be less than significant and less when compared to the less-than-significant impacts of the Project.

5.2.2.11.2 Operation

As previously discussed, the total energy consumption of Alternative 2 would be similar to that of the Project as Alternative 2 would construct the same uses and floor area as the Project. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 2. Impacts related to energy infrastructure would be less than significant under Alternative 2 and similar to the less-than-significant impacts of the Project.

5.2.3 Comparison of Impacts

As analyzed above, while Alternative 2 would reduce construction activities due to the elimination of one level of subterranean parking proposed by the Project, it would not eliminate any of the Project's impacts which are less than significant or less than significant with mitigation. Impacts under Alternative 2 would be similar to, or less than, those of the Project.

5.2.4. Relationship of the Alternative to Project Objectives

With the same mix of uses as the Project, Alternative 2 would meet the underlying purpose of the Project to the same extent as the Project by providing the same high quality

hotel development as the Project, providing new lodging opportunities within the City to serve the region and tourists as well as providing publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site, at the same design and service standard levels as the Project. In addition, Alternative 2 would achieve the following Project objectives:

- Support and expand tourism and business activity by developing new lodging opportunities that are easily accessible to entertainment and commercial destinations in the City of Beverly Hills.

- Provide short- and long-term employment opportunities and maximize transient occupancy tax revenue for the City through the development of a one-of-a-kind luxury hotel that will attract visitors to the Business Triangle and Beverly Hills.

- Reduce vehicular trips and promote local and regional mobility objectives by developing a hotel use with convenient access to a variety of alternative transportation options including walking, biking, and public transit, and in close proximity to popular tourist destinations.

- Replace existing uses and structures with an economically viable and aesthetically attractive development on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.

- Improve the pedestrian experience and enhance walkability through a pedestrian friendly design that includes pedestrian amenities at ground level.

- To accommodate vehicle flow on adjacent City streets and promote multiple transportation modes (walking, bicycling) by relocating the alley bisecting the Project Site, placing parking underground, limiting driveway access points, and enhancing the pedestrian environment on all of the adjoining streets.

5.0 Alternatives

5.3 Alternative 3: Zoning Compliant Alternative

5.3.1 Description of the Alternative

Alternative 3, the Zoning Compliant Alternative, would develop the Project Site consistent with the Project Site's current zoning of C-3 (Commercial) and the General Plan's land use designation for Low Density Commercial uses. The General Plan provides that the Project Site may be used for general commercial uses, including hotels and ancillary uses. Additionally, the Low Density Commercial designation limits development at the Project Site to a Floor Area Ratio (FAR) density of 2.0:1 and a height of 45 feet. Accordingly, Alternative 3 would include the development of a 36-room hotel (compared to the Project's 115 guest rooms) with ground floor and second floor retail on North Rodeo Drive and South Santa Monica Boulevard. The Project's proposed restaurant, bar, wellness center, spa, club, and penthouse uses would be eliminated along with all public access to the Project Site except for the ground-floor and second floor retail uses. Overall, Alternative 3 would provide 105,214 square feet of floor area with a FAR of 2.0:1, compared to the 220,950 square feet of floor area and 3.91:1 above-ground FAR and 4.2:1 total FAR as proposed by the Project (a reduction of 115,735 square feet of floor area).

As shown in Figure 5.0-1 through Figure 5.0-5 on pages 5.0-45 through 5.0-49, Alternative 3 would consist of three stories with a maximum height of 45 feet (a reduction in height ranging from 6 feet from the Project's 51 foot height along North Rodeo Drive, up to 70 feet in height from the Project's maximum height of 115 feet along North Beverly Drive). Alternative 3's design and architectural features include blocky massing without significant modulation or articulation, no common and private outdoor space (no guest room terraces, and a single limited roof terrace), a plain façade without the trellis-like garden porte cochere of the Project, guest balconies, awnings or greenery, or the pedestrian-friendly ground floor uses along South Santa Monica and North Beverly proposed by the Project. Without ground floor restaurant area and pedestrian oriented improvements, South Santa Monica and North Beverly would be dominated by vehicular uses. The sidewalk on South Santa Monica Boulevard would not be widened or improved for pedestrian activities as proposed by the Project. Alternative 3 eliminates recessed windows, balconies and overhangs that are incorporated throughout the Project, which shade window glazing while allowing deflected and diffused daylight into the building to enhance the use of natural light and reduce the need for artificial light sources.

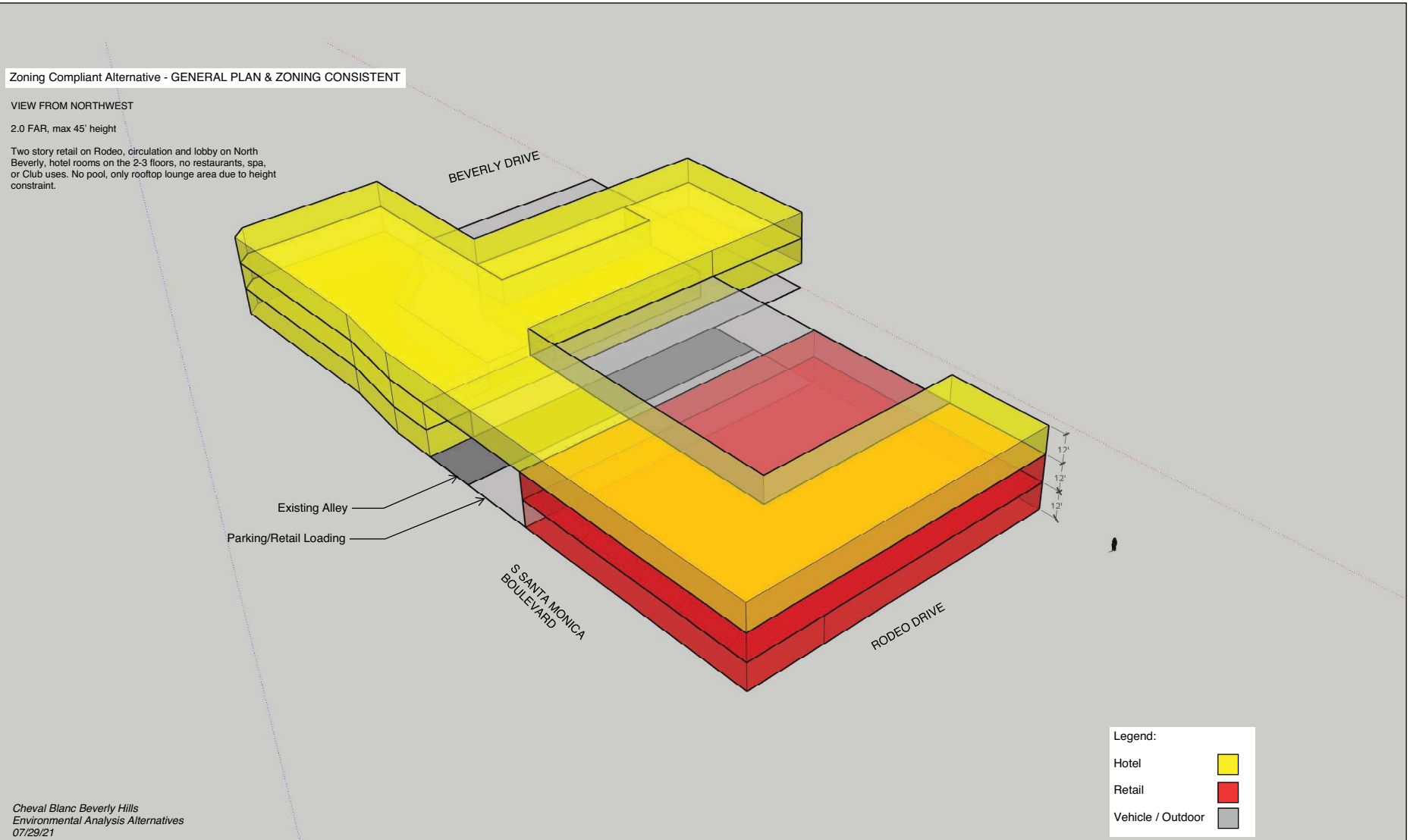

Figure 5.0-1

Alternative 3: Zoning Compliant Alternative, View from the Northwest

Source: Eyestone Environmental, 2022.

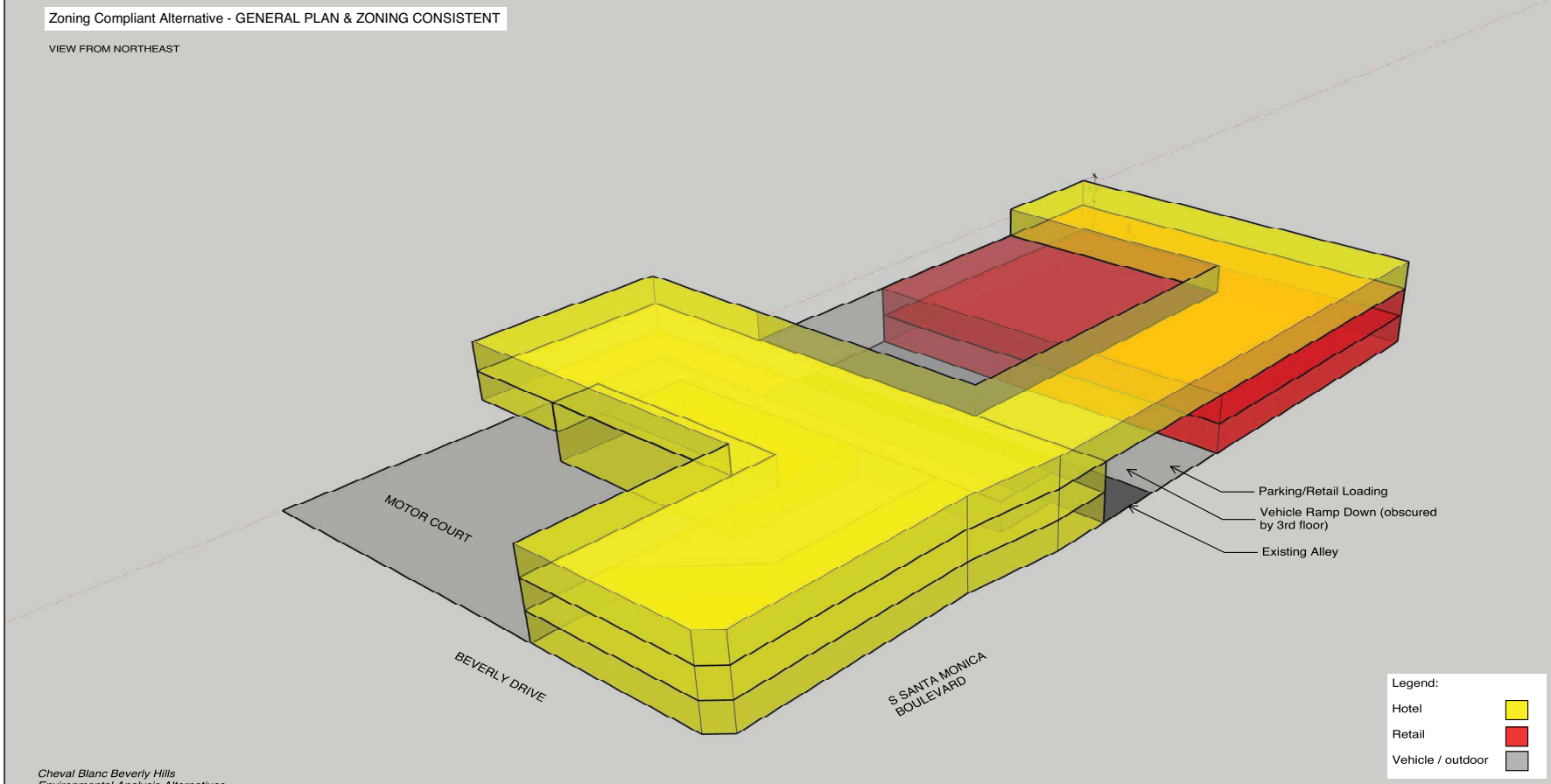

Figure 5.0-2

Alternative 3: Zoning Compliant Alternative, View from the Northeast

Source: Eyestone Environmental, 2022.

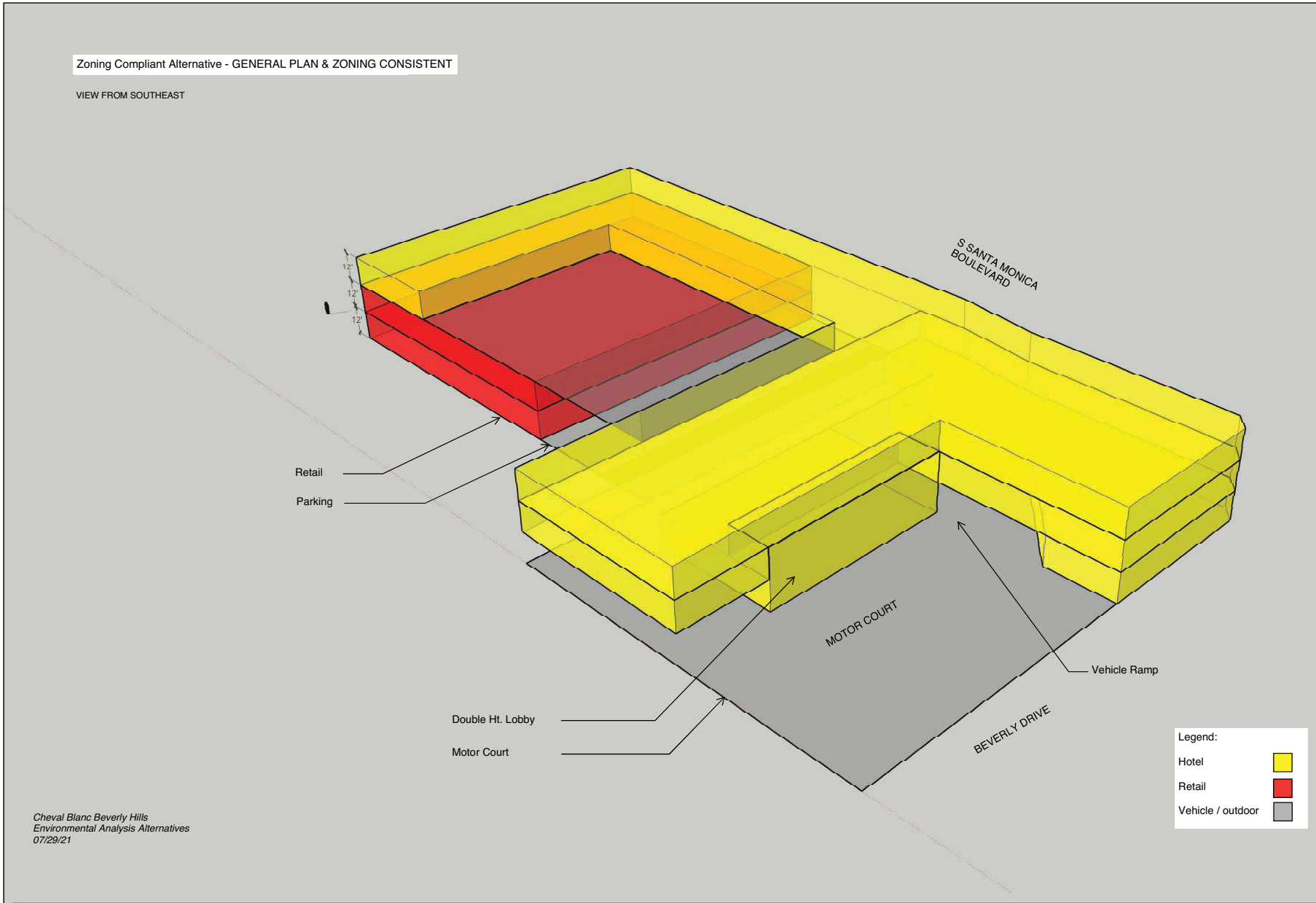

Figure 5.0-3

Alternative 3: Zoning Compliant Alternative, View from the Southeast

Source: Eyestone Environmental, 2022.

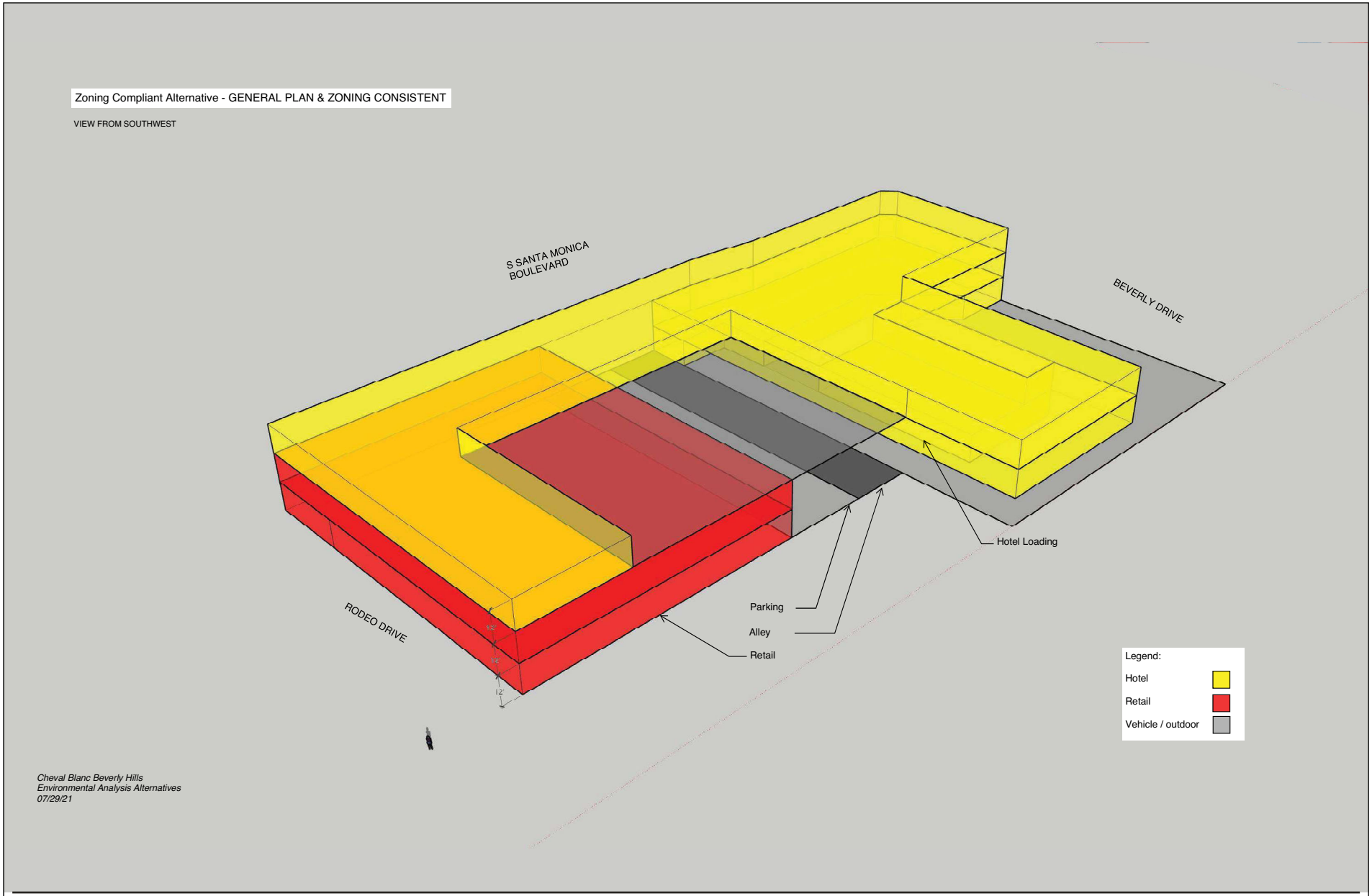

Figure 5.0-4

Alternative 3: Zoning Compliant Alternative, View from the Southwest

Source: Eyestone Environmental, 2022.

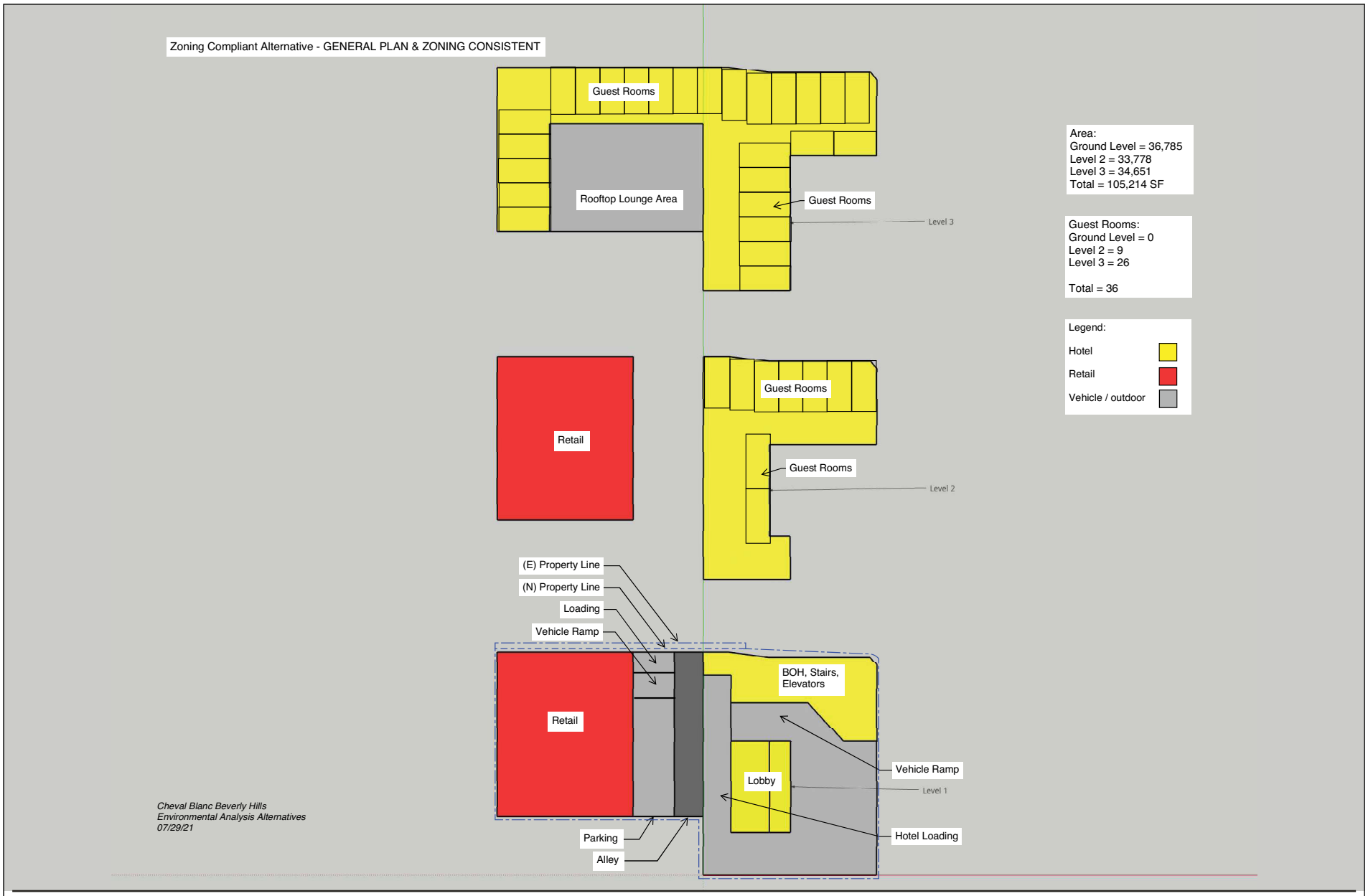

Figure 5.0-5

Alternative 3: Zoning Compliant Alternative, Floorplans for All Levels

Source: Eyestone Environmental, 2022.

As with the Project, primary pedestrian access to the Project Site under Alternative 3 would be provided through the hotel entrance, though it would be located along North Beverly Drive rather than on South Santa Monica Boulevard. As with the Project, retail spaces along North Rodeo Drive would have separate pedestrian access points from the sidewalk along the street.

Parking would be provided in one subterranean level (a reduction of two subterranean levels when compared to the Project's three proposed subterranean levels) with a total of 90 parking spaces (a reduction of ~~88~~95 parking spaces when compared to the Project's proposed ~~178~~185 parking spaces). As previously discussed, all public access to the Project Site would be eliminated under Alternative 3 except for the proposed retail uses.

As with the Project, Alternative 3 would include a proposed valet motor court for drop-off and pick-up for hotel guests and retail patrons, though it would be located on North Beverly Boulevard rather than on South Santa Monica Boulevard. The proposed valet motor court would connect to the existing alley under Alternative 3, which would remain in its current configuration, as compared to the Project's proposed relocation of the alley. Employee and valet driven vehicles would enter Alternative 3's subterranean parking from the valet motor court on North Beverly Drive. Employees and small delivery vans would also enter and exit the subterranean parking level through the valet motor court; full size delivery vans and trucks would use surface level loading areas located near the alley.

The open space areas and landscaping proposed by the Project would be largely eliminated under Alternative 3. Specifically, Alternative 3 would eliminate the Project's proposed pool decks; the landscaped porte cochere roof-top over the motor court; the publicly-accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork; the 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven; the 742-square-foot outdoor terrace on the seventh level; the wellness center outdoor area; the hotel room balcony/patio areas; and the majority of the outdoor landscaping. The open space under Alternative 3 would consist of a rooftop lounge on the third floor. Alternative 3 would replace the 15 street trees lining the sidewalks with fewer street trees, due to the increase in curb cuts.

As Alternative 3 would reduce the amount of construction and excavation/export compared to the Project, construction activities and the construction period would be reduced compared to the Project. Similar to the Project, construction activities would include demolition of existing uses, grading and excavation, and construction of a new structure and related infrastructure. Due to the elimination of the second and third subterranean levels, the total depth of excavation required for Alternative 3 would be

reduced as compared to the Project from 44 feet to a depth of 15 feet (a reduction of 29 feet when compared to the Project). Consequently, soil export for Alternative 3 would be reduced as compared to the Project, and would include 18,435 cubic yards of exported soil (a reduction of 106,485 cubic yards when compared to the Project's proposed 124,920 cubic yards of soil export). Between the hours of 7:00 P.M. to 10:00 P.M., the designated outbound (leaving the Project Site) haul route is anticipated to be from the Project Site to eastbound South Santa Monica Boulevard to Burton Way to San Vicente Boulevard to southbound La Cienega Boulevard to Interstate 10. The reverse of this route would be used for inbound truck traffic from 7:00 P.M. to 10:00 P.M. Between the hours of 10:00 P.M. to 7:30 A.M., the designated outbound haul route is anticipated to be from the Project Site to southbound Beverly Drive to eastbound Wilshire Boulevard to southbound La Cienega Boulevard. Between the hours of 10:00 P.M. to 7:30 A.M., the inbound haul route would be from Interstate 10 to northbound La Cienega Boulevard to westbound Wilshire Boulevard to northbound North Camden Drive to eastbound South Santa Monica Boulevard to the Project Site. It is noted that intermittent lane closures associated with construction of the future Metro D (formerly Purple) Line Rodeo Station are anticipated to occur on Beverly Drive through 2024. When periodic lane closures associated with the Metro station construction occur on Beverly Drive and/or Wilshire Boulevard, the nighttime haul trucks would utilize the evening (7:00 P.M. to 10:00 P.M.) haul route described above.

With regard to discretionary entitlements, Alternative 3 would not require a General Plan Amendment; a Zoning Map and Zone Text Amendment; a Specific Plan; or an Amendment to the Master Plan of Streets

5.3.2 Environmental Impacts

5.3.2.1 Air Quality

5.3.2.1.1 Regional Emissions

5.3.2.1.1.1 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 4.1, Air Quality, of this Final EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

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

of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities, although such emissions would be experienced over a shorter construction period. Therefore, as with the Project, total contributions to regional air pollutant emissions during construction under Alternative 3 would be less than significant. However, with the reduction of floor area and excavation activities, such impacts would be less than the less-than-significant impacts of the Project.

5.3.2.1.1.2 Operation

As with the Project, operational regional air pollutant emissions associated with Alternative 3 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, along with the consumption of electricity and natural gas. As previously discussed, Alternative 3 would provide 105,214 square feet of floor area compared to the 220,950 square feet of floor area as proposed by the Project (a reduction of 115,735 square feet). As such, the number of net new daily vehicle trips generated by Alternative 3 would be less than the net new daily vehicle trips generated by the Project. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 3 would be less than the emissions generated by the Project. In addition, both area sources and stationary sources would also generate on-site operational air emissions less than the Project due to the reduction in floor area of Alternative 3 and consequent reduction in energy usage of the building, which would result in lower emissions. Therefore, under Alternative 3, total contributions to regional air pollutant emissions during operation would be less than the Project's contribution. Thus, impacts to regional air quality under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

5.3.2.1.2 Localized Emissions

5.3.2.1.2.1 Construction

As Alternative 3 would develop the Project Site and construct the proposed building within the same footprint as the Project, construction activities associated with Alternative 3 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 3 would also be similar to those of the Project, although such emissions would occur over a shorter construction period. Therefore, as with the Project, localized impacts under Alternative 3 would be less than significant. However, with the reduction of floor area and excavation activities, such impacts would be less than the less-than-significant impacts of the Project.

5.3.2.1.2.2 Operation

Localized operational impacts are determined primarily by traffic volumes using SCAQMD's CalEEMod model. As described above, Alternative 3 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips under Alternative 3 would be reduced compared to the Project. In addition, as with the Project, Alternative 3 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 3 would also be less than significant and less than the less-than-significant impacts of the Project.

5.3.2.1.3 Toxic Air Contaminants

5.3.2.1.3.1 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 4.1, Air Quality, of this Final 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 the amount of construction and excavation activities required during construction of Alternative 3 would be reduced. As with the Project, the construction phases which require the most heavy-duty diesel vehicle usage, such as site grading, would last for a short duration. Thus, construction of Alternative 3 also would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions. Thus, impacts due to TAC emissions under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

5.3.2.1.3.2 Operation

As set forth in Section 4.1, Air Quality, of this Final EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 3, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be less than the Project since the Project's proposed restaurant, bar, wellness center, spa, club, and penthouse uses would be eliminated. Similar to the Project, the land uses proposed under Alternative 3 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 3 would not release substantial amounts of TACs, and impacts would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project.

5.3.2.2 Biological Resources

As with the Project, Alternative 3 would require the removal of 15 street trees that would be replaced at a 1:1 basis. As discussed in Section 4.2, Biological Resources, of this Final EIR, based on the results of the daytime bat habitat assessment and survey, there is marginal roosting habitat for bats in the 15 street trees lining the sidewalks and no suitable habitat in the on-site buildings. Because the 12 palm street trees lining the sidewalks appear to provide marginal bat roosting habitat, impacts to bats and roosts could be potentially significant under the Project. Therefore, as with the Project, Alternative 3 has the potential to impact bats and roosts due to the removal of the same street trees proposed by the Project. However, Alternative 3 would implement the same mitigation measures as the Project in order to mitigate potential impacts to bats and roosts to a less than significant level. Therefore, the potential for direct impacts to biological resources as a result of removal of the street trees lining the sidewalks would also be less than significant with mitigation under Alternative 3, and such impacts would be similar to the Project's impacts to biological resources.

5.3.2.3 Cultural Resources

5.3.2.3.1 Historical Resources

As with the Project, Alternative 3 would require demolition of the existing buildings. As determined in the Historic Resource Assessment Reports included in Appendix D of this Final EIR, the existing on-site buildings do not qualify as historical resources. Therefore, the potential for direct impacts to historical resources as a result of removal of the existing buildings on-site would also be less than significant under this alternative.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 3 also has the potential to impact one historical resource located across the street from the Project Site, the Writers and Artists Building at 9507 S. Santa Monica Boulevard, due to potential structural vibration and settlement as a result of on-site vibration generated during construction of Alternative 3. However, as provided in Section 4.8, Noise, of this Final EIR, the estimated vibration velocity levels from all construction equipment would be well below the building damage significance threshold for the Writers and Artists Building. As the development proposed under Alternative 3 would be reduced compared to the Project, Alternative 3 would similarly not result in a significant indirect impact to historical resources in the vicinity of the Project Site. Therefore, the potential for indirect impacts on adjacent historical resources would be less than significant under this alternative and such impacts would be similar to the Project.

Overall, impacts to historical resources under Alternative 3 would be less than significant, and similar to the less-than-significant impacts of the Project.

5.3.2.3.2 Archaeological Resources

As previously discussed, Alternative 3 would eliminate two of the three levels of subterranean parking proposed by the Project. The existing maximum depth of disturbance at the Project Site is associated with one subterranean level at 461 N. Beverly Drive. Therefore, Alternative 2 would still involve excavation within previously undisturbed soil. However, Alternative 3 would require less excavation and would reduce the potential for uncovering unknown archaeological resources, as the amount of excavation correlates with the opportunity to uncover such resources. Nevertheless, Alternative 3 would implement the same mitigation measure as the Project in order to mitigate potential impacts to archaeological resources. Overall, similar to the Project, potential impacts to archaeological resources would be less than significant with mitigation. However, such impacts would be reduced compared to the Project due to the reduction in excavation activities under Alternative 3. Therefore, impacts to archaeological resources would be less than the less-than-significant with mitigation impacts of the Project.

5.3.2.4 Energy

5.3.2.4.1 Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

5.3.2.4.1.1 Construction

Similar to the Project, construction activities associated with Alternative 3 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. As with the Project, Alternative 3 would also generate a demand for transportation energy associated with on- and off-road vehicles. Like the Project, construction activities associated with Alternative 3 would not involve the consumption of natural gas. The energy consumed during construction of Alternative 3 would be less than that of the Project due to the reduction in construction activities. As with the Project, the electricity demand during construction of Alternative 3 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 3 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 3 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, the consumption of energy under Alternative 3 during construction activities would not be 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.

5.3.2.4.1.2 Operation

As with the Project, operation of Alternative 3 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As described above, Alternative 3 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips under Alternative 3 would be reduced compared to the Project. Therefore, the consumption of electricity, natural gas, and petroleum-based fuels would be less than the Project. Like the Project, Alternative 3 would implement design features to reduce energy usage that would exceed Title 24 energy requirements. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels during operations 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.

5.3.2.4.2 Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section 4.4, Energy, of this Final EIR, the current City of Beverly Hills Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 3 would comply with the City's Green Building Code, as well as be capable of achieving at least LEED® ~~Silver~~ Gold equivalent status. Therefore, similar to the Project, Alternative 3 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 3 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Therefore, as with the Project, 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 such impacts would be similar to the less-than-significant impacts of the Project.

5.3.2.5 Geology and Soils (Paleontological Resources)

As described above, Alternative 3 would eliminate two of the three levels of subterranean parking proposed by the Project. The existing maximum depth of disturbance at the Project Site is associated with one subterranean level at 461 N. Beverly Drive. Therefore, Alternative 2 would still involve excavation within previously undisturbed soil. However, the potential for uncovering paleontological artifacts that were not recovered during prior construction or other human activity would be reduced compared to the

Project, as the amount of excavation correlates with the opportunity to uncover such resources. Nevertheless, Alternative 3 would implement the same mitigation measures as the Project in order to mitigate potential impacts to paleontological resources to a less than significant level. Overall, similar to the Project, potential impacts to paleontological resources would be less than significant with mitigation. However, such impacts would be reduced compared to the Project due to the reduction in excavation activities under Alternative 3. Therefore, impacts to paleontological resources would be less than the less-than-significant with mitigation impacts of the Project.

5.3.2.6 Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As previously discussed, Alternative 3 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips under Alternative 3 would be reduced compared to the Project. Thus, the amount of GHG emissions generated by Alternative 3 would be less than the amount generated by the Project. As with the Project, Alternative 3 would be designed to comply with the requirements of the CALGreen Code and the Beverly Hills Green Building Code. Alternative 3 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED ~~Silver~~ Gold or equivalent green building standards. However, Alternative 3 eliminates recessed windows, balconies and overhangs that are incorporated throughout the Project, which shade window glazing while allowing deflected and diffused daylight into the building and reduce the need for artificial light sources. With compliance with the CALGreen Code and the Beverly Hills Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 3 also would not conflict with any applicable plan, policy, regulation, or recommendation to reduce GHG emissions. Alternative 3's GHG emissions from vehicle trips would be less than the Project's based on the smaller size of Alternative 3. Alternative 3's GHG impacts would be less than significant and less than the less-than-significant impacts of the Project.

5.3.2.7 Land Use and Planning

As previously described, Alternative 3 would develop the Project Site with retail uses similar to the Project and a 36-room hotel that eliminates the Project's proposed restaurant, bar, wellness center, spa, club, and penthouse uses as well as the proposed pool decks, the garden porte cochere over the motor court, the publicly-accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, the 742-square-foot outdoor terrace on the seventh level, the hotel room balcony/patio areas, and the majority of the outdoor landscaping. The open space under Alternative 3 would consist of an outdoor lounge contiguous with the third level of the building. As Alternative 3 could be

developed in compliance with the existing Project Site zoning, with the issuance of a Conditional Use Permit, this alternative would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. In particular, Alternative 3 would not conflict with the Project Site's current zoning of C-3 (Commercial), which is designated as Low Density Commercial in the General Plan Land Use Element. Thus, impacts related to conflicts with land use plans under Alternative 3 would be less than significant and less than the less-than-significant impacts of the Project.

5.3.2.8 Noise

5.3.2.8.1 Construction

5.3.2.8.1.1 On- and Off-Site Noise During Construction

The types of construction activities under Alternative 3 would be similar to the Project, although the amount of construction would be reduced due to the reduction in floor area and elimination of two 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. While the overall duration and amount of construction may be reduced under Alternative 3, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to the Project during maximum (peak) activity days, although such construction would occur over a shorter construction period. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 3 would comply with the same applicable regulatory requirements and implement similar design features as the Project to reduce noise levels during construction. Therefore, as with the Project, on-site and off-site construction noise impacts would be less than significant. Overall, construction-related noise impacts under Alternative 3 would be similar to those of the Project.

5.3.2.8.1.2 Vibration During Construction

As noted above, the types of construction activities under Alternative 3 would be similar to the Project, although construction activities would be reduced due to the reduction of floor area and elimination of two levels of subterranean parking. As with the Project, construction of Alternative 3 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-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project during maximum (peak) activity days. As such, vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project,

although such vibration levels would occur over a shorter duration. Alternative 3 would also implement similar design features and mitigation measure as the Project to reduce on-site vibration levels during construction. As such, vibration impacts due to on-site construction activities under Alternative 3 would similarly be less than significant with mitigation for on-site construction vibration (building damage) and less than significant for on-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 3 would be similar to the impacts of the Project.

5.3.2.8.2 Operation

5.3.2.8.2.1 On- and Off-Site Noise During Operation

As discussed in Section 4.8, Noise, of this Final EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as outdoor mechanical equipment, activities at or within the proposed outdoor space parking facilities and loading dock; and (b) off-site mobile (roadway traffic) noise sources.

As previously discussed, Alternative 3 would eliminate the Project's proposed restaurant, bar, wellness center, spa, club, and penthouse uses as well as the 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven, the 742-square-foot outdoor terrace on the seventh level, the wellness center outdoor area, and the hotel room balcony/patio areas. The open space under Alternative 3 would consist of a rooftop lounge on the third floor. Due to the elimination of these uses, the noise levels generated during Alternative 3 would be anticipated to be less than the noise levels of the Project. Thus, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, as previously discussed, Alternative 3 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips under Alternative 3 would be reduced compared to the Project. Therefore, as with the Project, off-site noise impacts under Alternative 3 would be less than significant, and such impacts would be less than those of the Project.

5.3.2.8.2.2 Vibration During Operation

As discussed in Section 4.8, Noise, of this Final EIR, sources of vibration related to operation under the Project would include (a) vehicle circulation, (b) delivery trucks, and (c) building mechanical equipment. Vehicular-induced vibration, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. Building mechanical equipment installed as part of the Project would include typical commercial-grade stationary mechanical equipment, which would

include vibration-attenuation mounts to reduce vibration transmission so vibration would not be perceptible at the off-site sensitive receptors.

Alternative 3 would introduce vibration from similar vibration sources as the Project. Due to the development of similar uses as the Project, the vibration levels generated during Alternative 3 would be anticipated to be similar to the vibration levels of the Project. Thus, operational vibration impacts would be less than significant and similar to the less-than-significant impacts of the Project.

5.3.2.9 Transportation

As discussed above, Alternative 3 would be developed within the same Project Site as the Project; therefore, the plans, policies, and programs applicable to the Project would also apply to Alternative 3.

With regard to construction, Alternative 3 would include the development of a 36-room hotel (compared to the Project's 115 guest rooms) with ground floor and second floor retail on North Rodeo Drive and South Santa Monica Boulevard. The Project's proposed restaurant, bar, wellness center, spa, club, and penthouse uses would be eliminated along. Overall, Alternative 3 would provide 105,214 square feet of floor area (a reduction of 115,735 square feet of floor area compared to the Project). While the types of construction activities under Alternative 3 would be similar to the Project, the amount of construction activities would be reduced. As with the Project, construction of Alternative 3 would generate construction-related traffic from haul trucks and construction workers and would also require the delivery and staging of construction and materials and equipment. As such, similar to the Project, potential construction-related transportation impacts could also result during construction of Alternative 3. While the overall duration and amount of construction would be reduced under Alternative 3, construction activities and the associated construction traffic levels would be expected to be similar to the Project during maximum (peak) activity days. As such, transportation-related impacts during construction would be similar to those of the Project, although such impacts would be experienced over a shorter duration compared to the Project. Alternative 3 would also implement similar mitigation as the Project to reduce potential construction-related transportation impacts to a less-than-significant level. Therefore, as with the Project, construction-related transportation impacts would be less than significant with mitigation, similar to those of the Project.

Alternative 3 would include hotel and retail uses as with the Project but would eliminate the Project's proposed restaurant, bar, wellness center, spa, club, and penthouse uses as well as the proposed pool decks, the garden porte cochere over the motor court, the 742-square-foot outdoor terrace on the seventh level, the hotel room balcony/patio

areas, the majority of the outdoor landscaping, and the second and third levels of subterranean parking. In total, Alternative 3 would reduce the number of new parking spaces provided as part of the Project by approximately ~~88~~95 spaces. However, Alternative 3 would continue to comply with City requirements regarding vehicle parking. Overall, as with the Project, Alternative 3 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 3 would be consistent with the City of Beverly Hills General Plan, the City's Draft Complete Streets Plan, the LA Metro First Last Mile Strategic Plan, and the SGAG RTP/SCS. Similar to the Project, Alternative 3 would reduce vehicle trips and VMT by encouraging the use of alternative modes of transportation by providing convenient and adequate bicycling facilities. Alternative 3 would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Thus, impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, similar to the Project, Alternative 3 meets Screening Criteria 2 and Screening Criteria 4 adopted by the City of Beverly Hills, as detailed in Section 4.9, Transportation, of this Final EIR. Based on the screening criteria, Alternative 3 would have a less than significant VMT impact and is screened out from further VMT analysis. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be similar to the less-than-significant impacts of the Project.

As with the Project, Alternative 3 would not introduce hazardous design features such as sharp curves or hazardous uses. Thus, impacts related to increased hazards due to a design feature or incompatible uses would be less than significant under Alternative 3 and such impacts would be similar to the less than significant impacts of the Project.

With regard to emergency access, during construction of Alternative 3, travel lanes would be maintained in both directions in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access, similar to the Project. During operation, Alternative 3 also would not involve the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, like the Project, Alternative 3 would comply with Beverly Hills Fire Department access requirements and applicable Beverly Hills Fire Department regulations regarding safety. Therefore, Alternative 3 also would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts regarding inadequate emergency access would be less than significant, and similar to the less than significant impacts of the Project.

5.3.2.10 Tribal Cultural Resources

As noted above, Alternative 3 would eliminate two levels of subterranean parking proposed by the Project. Therefore, the potential for Alternative 3 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. In addition, as discussed in Section 4.10, Tribal Cultural Resources, of this Final EIR, no known recorded tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site. Nevertheless, Alternative 3 would implement the same mitigation measures as the Project in order to mitigate potential impacts to tribal cultural resources to a less than significant level. Overall, similar to the Project, potential impacts to tribal cultural resources would be less than significant with mitigation. However, such impacts would be less than the less than significant impacts of the Project due to the reduction in excavation activities under Alternative 3.

5.3.2.11 Utilities and Service Systems (Energy Infrastructure)

5.3.2.11.1 Construction

As discussed above, Alternative 3 would reduce the amount of energy needed for construction activities based on the reduction in the amount of construction. As discussed in Section 4.11, Utilities and Service Systems—Energy Infrastructure, of this Final EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 3 would generate a reduced demand for energy during construction compared to the Project, the energy demand of Alternative 3 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity would be less than significant and less when compared to the less-than-significant impacts of the Project.

5.3.2.11.2 Operation

As previously discussed, the total energy consumption of Alternative 3 would be less than that of the Project due to the reduction in uses. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 3. Impacts related to energy infrastructure would be less than significant under Alternative 3 and less than the less-than-significant impacts of the Project.

5.3.3 Comparison of Impacts

As analyzed above, Alternative 3 would reduce construction and operational activities due to the reduction in development and, more specifically, elimination of the Project's proposed restaurant, bar, wellness center, spa, club, and penthouse uses as well as the pool decks, the garden porte cochere over the motor court, the publicly accessible

670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, the 742-square-foot outdoor terrace on the seventh level, the hotel room balcony/patio areas, and two levels of subterranean parking. However, it would not eliminate any of the Project's impacts, which are less than significant or less than significant with mitigation. Impacts under Alternative 3 would be similar to, or less than, those of the Project.

5.3.4. Relationship of the Alternative to Project Objectives

With the elimination of the Project's proposed restaurant and bar uses, Alternative 3 would not meet the underlying purpose of the Project to revitalize the Project Site by developing a high quality hotel development project that provides new lodging opportunities within the City to serve the region and tourists as well as publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site. Specifically, the number of hotel rooms would be reduced (36 rooms as compared to the Project's up-to 115 rooms) and all hotel amenities (restaurant, bar, pool, spa, wellness center with gym, members club) would be eliminated, as are the sidewalk improvements. Alternative 3 would therefore not provide a high quality hotel development within the City to serve the region and tourists as well as publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site. Notwithstanding, Alternative 3 would achieve the following Project objective, albeit to a lesser extent than the Project, due to its limited number of hotel rooms (2/3 fewer than those provided by the Project) and lack of amenities typically provided as part of a luxury hotel, including restaurants and bars, spa and pools.

- Reduce vehicular trips and promote local and regional mobility objectives by developing a hotel use with convenient access to a variety of alternative transportation options including walking, biking, and public transit, and in close proximity to popular tourist destinations.

The following objectives are either not met or only partially met by Alternative 3 due to the reduction in the number of hotel rooms; the retention of the alley in its current configuration; the reduction of two subterranean levels of parking; and the elimination of the restaurant uses, hotel amenities, garden porte cochere over the motor court, sidewalk widening and pedestrian improvements and the majority of the outdoor landscaping:

- Replace existing use and structures with an economically viable and aesthetically attractive development on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.

- Support and expand tourism and business activity by developing new lodging opportunities that are easily accessible to entertainment and commercial destinations in the City of Beverly Hills.

- Provide short- and long-term employment opportunities and maximize transient occupancy tax revenue for the City through the development of a one-of-a-kind luxury hotel that will attract visitors to the Business Triangle and Beverly Hills.

- Improve the pedestrian experience and enhance walkability through a pedestrian friendly design that includes pedestrian amenities at ground level.

- To accommodate vehicle flow on adjacent City streets and promote multiple transportation modes (walking, bicycling) by relocating the alley bisecting the Project Site, placing parking underground, limiting driveway access points, and enhancing the pedestrian environment on all of the adjoining streets.

5.0 Alternatives

5.4 Alternative 4: Reduced Height Alternative

5.4.1 Description of the Alternative

Alternative 4, the Reduced Height Alternative, would develop the Project Site with the same uses, floor area, and parking spaces as proposed by the Project, providing 220,950 square feet of floor area with an above-ground FAR of 3.91:1 and a total FAR of 4.2:1. However, Alternative 4 redistributes the massing of the building to reduce the overall height to seven stories, and reorients the Project's proposed U-shaped building to the south, such that the bulk of its massing would be positioned between the outdoor spaces—where the proposed uses include amplified sound—and the residential neighborhoods to the north.

~~The~~ As shown in Figure 5.0-6 through Figure 5.0-13 on pages 5.0-66 through 5.0-73, the proposed hotel building would consist of seven stories with a maximum height of 89 feet, as compared to the Project which would vary in height from four stories and a maximum height of 51 feet along North Rodeo Drive (an increase of 48 feet) to nine stories with a maximum height of 115 feet along North Beverly Drive (a reduction of 26 feet in height). In addition to the reorientation of the Project's proposed U-shaped building to the south, under Alternative 4, the third through sixth floors would extend over the motorcourt, and the hotel amenities would be concentrated at the center of the building, with the spa on the third floor, the private club and bar on the fourth floor, the wellness center and additional private club uses on the fifth floor, and the pool deck on the sixth floor. These amenities would be wrapped with hotel guest rooms along North Rodeo Drive, South Santa Monica Boulevard, and North Beverly Boulevard, thus resulting in a U-shaped building that faces south. By comparison, under the Project, the motorcourt would be open-air with the building developed around it in a U-shape that faces South Santa Monica Boulevard and the residential neighborhoods to the north, with the private club on the third floor, the spa on the fourth floor, the pool deck and bar on the sixth floor, and the wellness center on the eighth floor. Furthermore, under Alternative 4, the penthouse would be positioned to the north of the penthouse pool deck. By comparison, the penthouse would be positioned to the east of the penthouse pool deck under the Project.

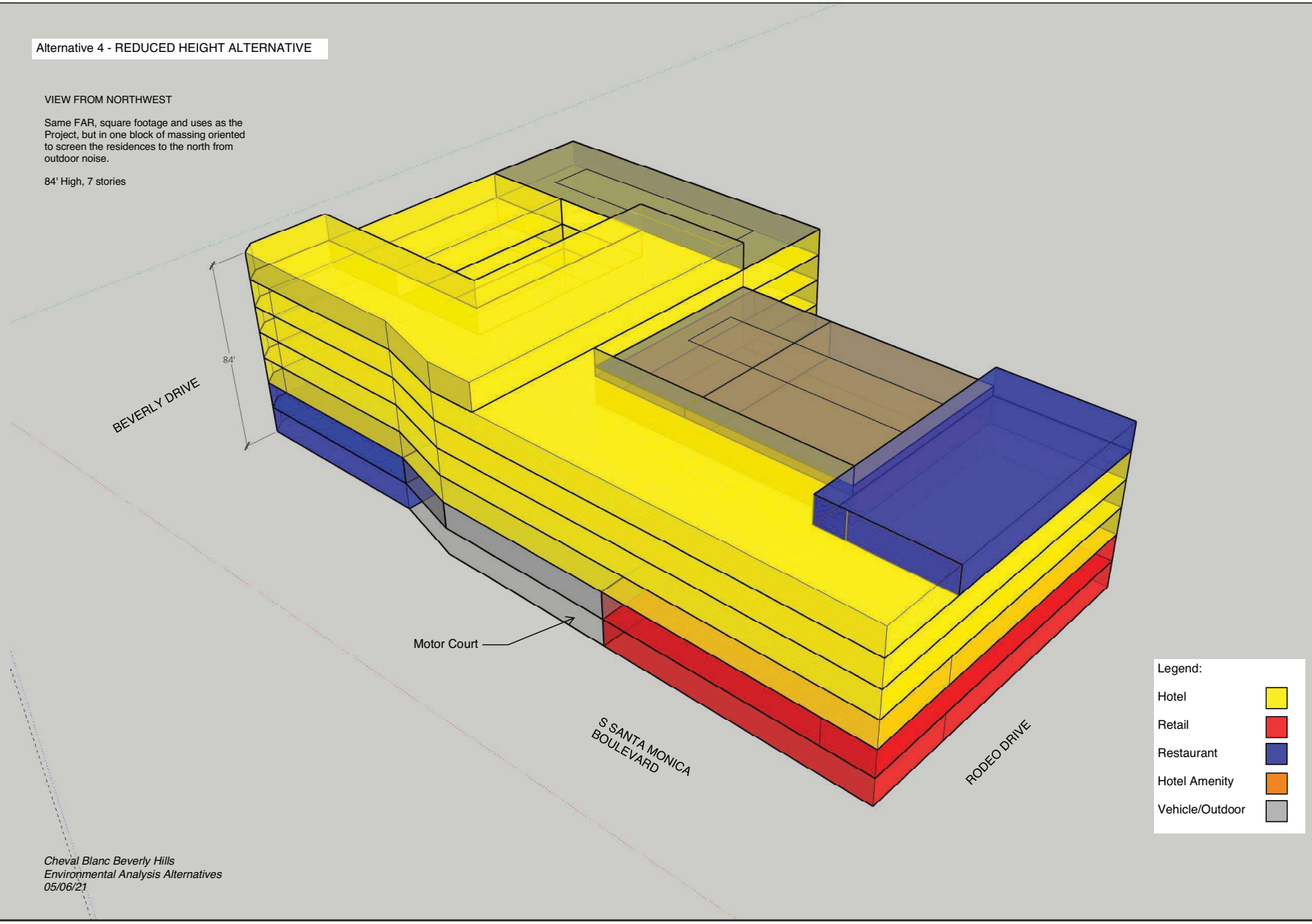

Figure 5.0-6

Alternative 4: Reduced Height Alternative, View from the Northwest

Source: Eyestone Environmental, 2022.

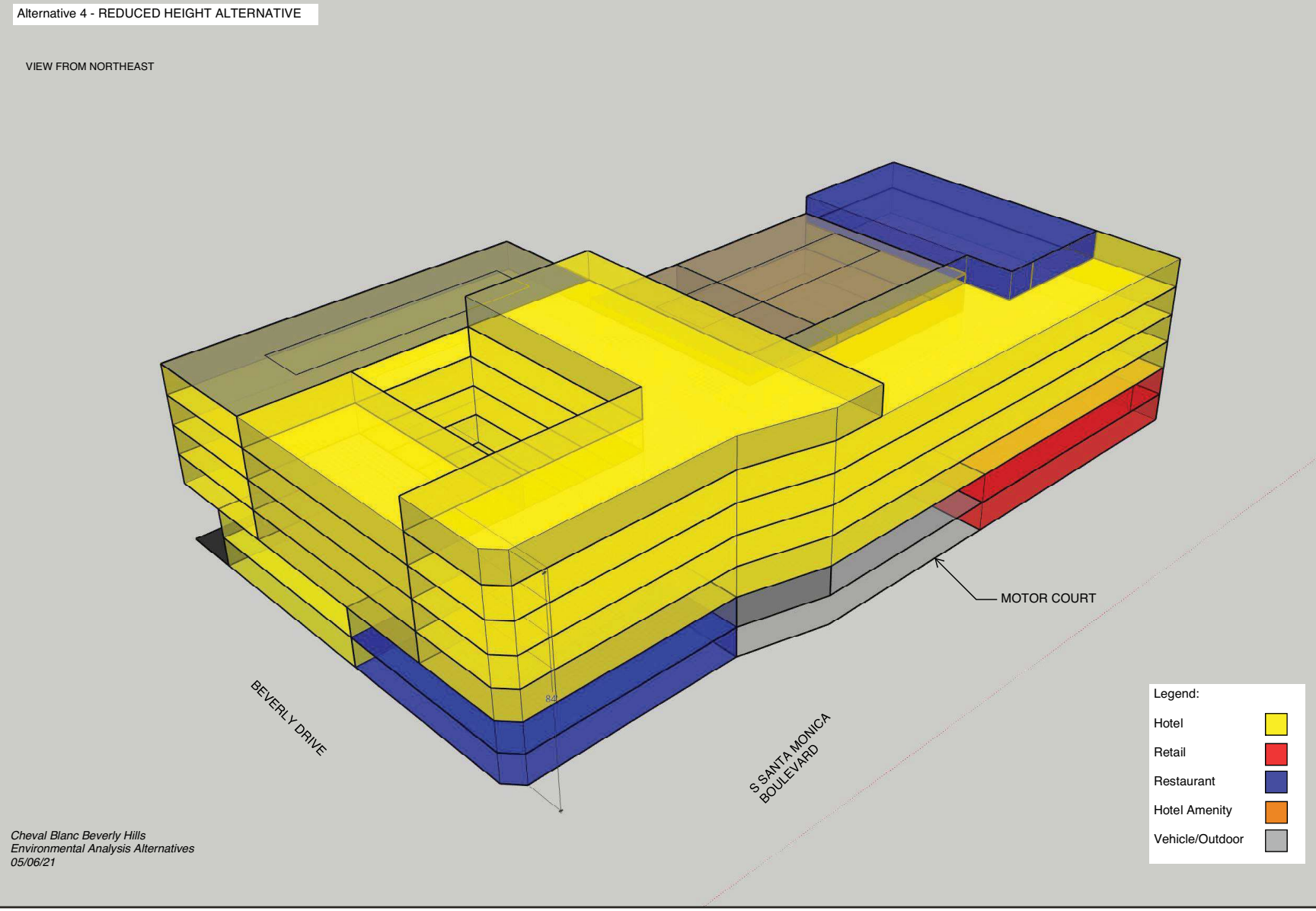

Figure 5.0-7

Alternative 4: Reduced Height Alternative, View from the Northeast

Source: Eyestone Environmental, 2022.

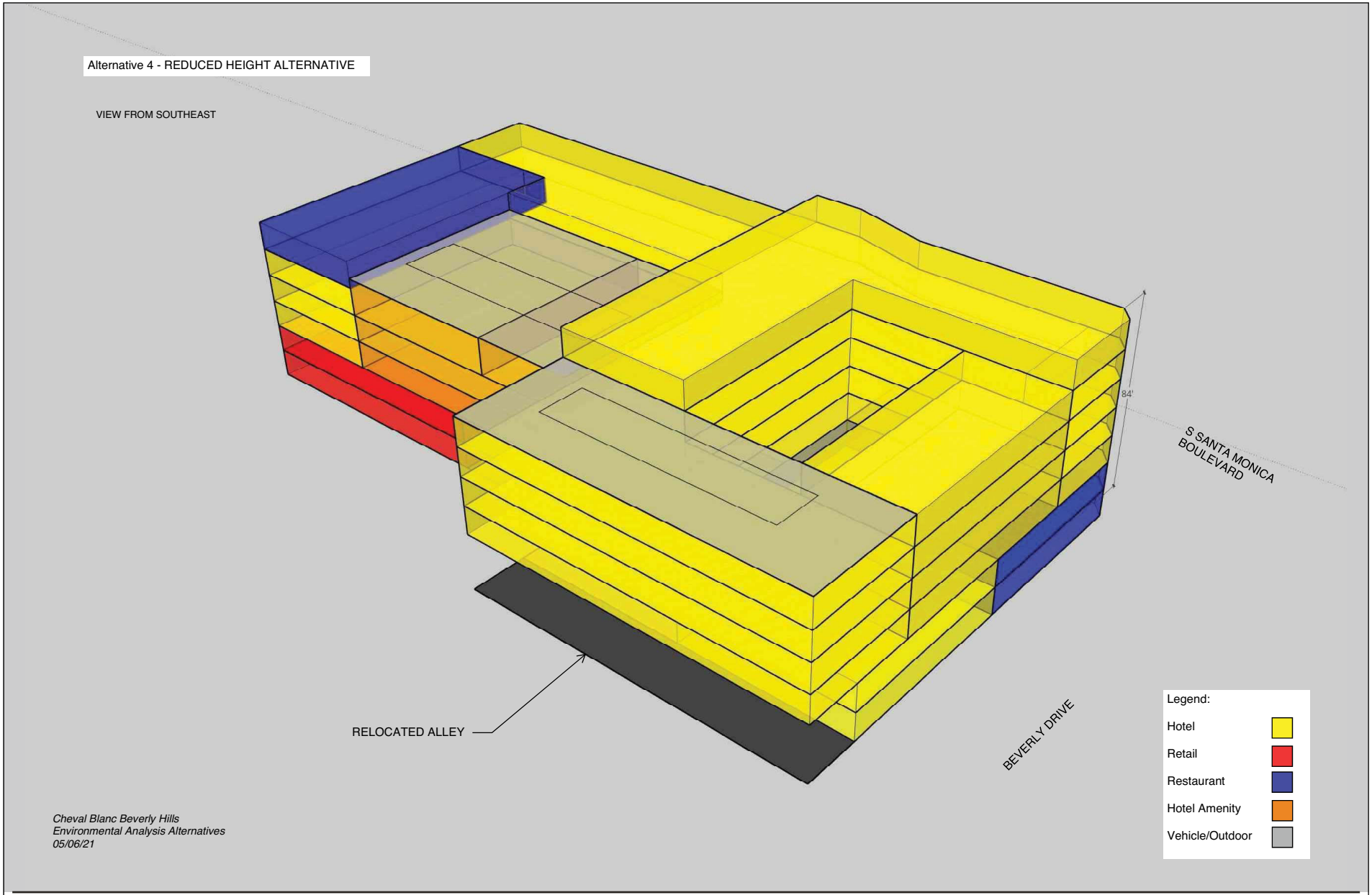

Figure 5.0-8

Alternative 4: Reduced Height Alternative, View from the Southeast

Source: Eyestone Environmental, 2022.

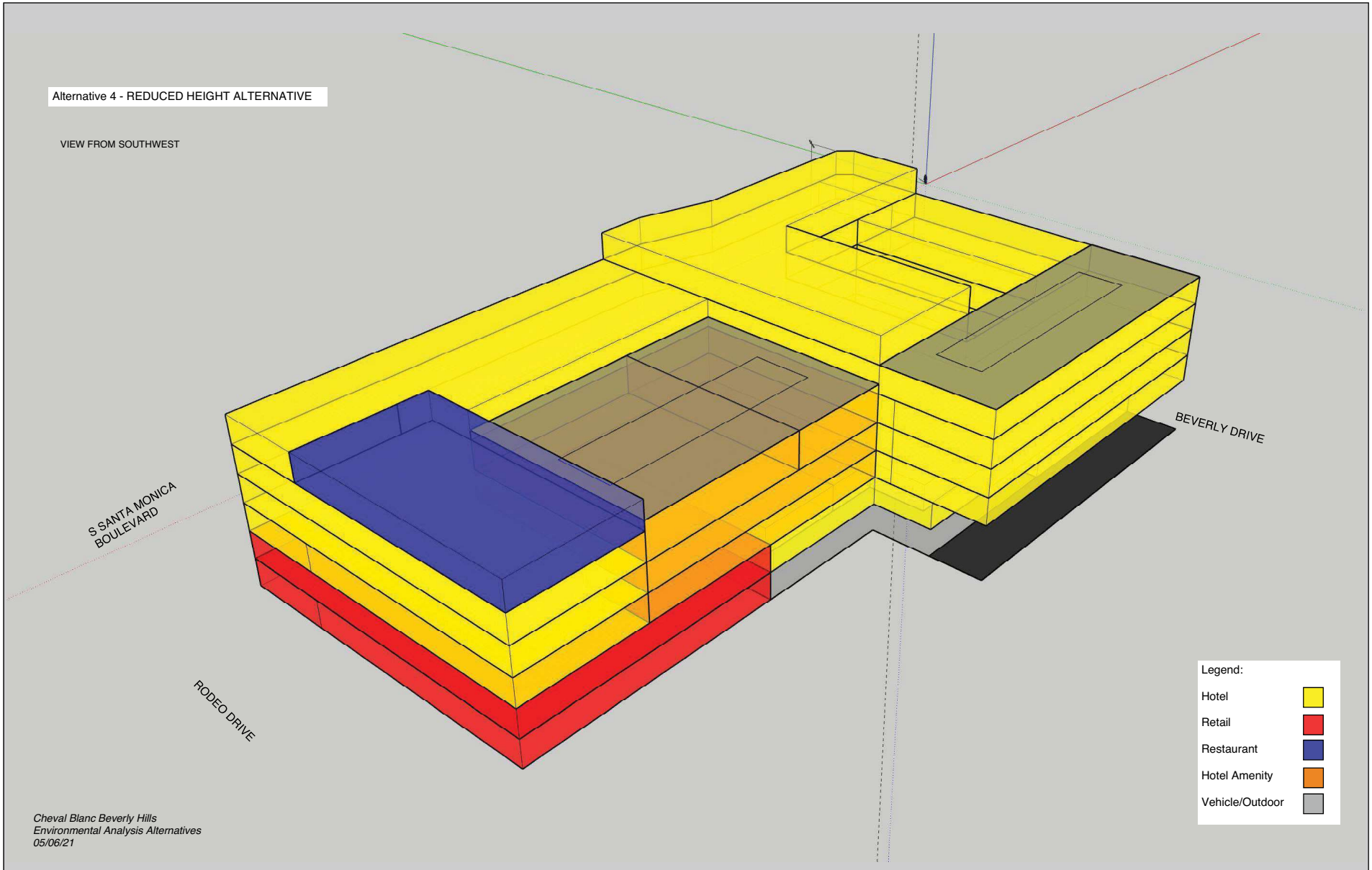

Figure 5.0-9

Alternative 4: Reduced Height Alternative, View from the Southwest

Source: Eyestone Environmental, 2022.

Figure 5.0-10

Alternative 4: Reduced Height Alternative, Floorplans for All Levels

Source: Eyestone Environmental, 2022.

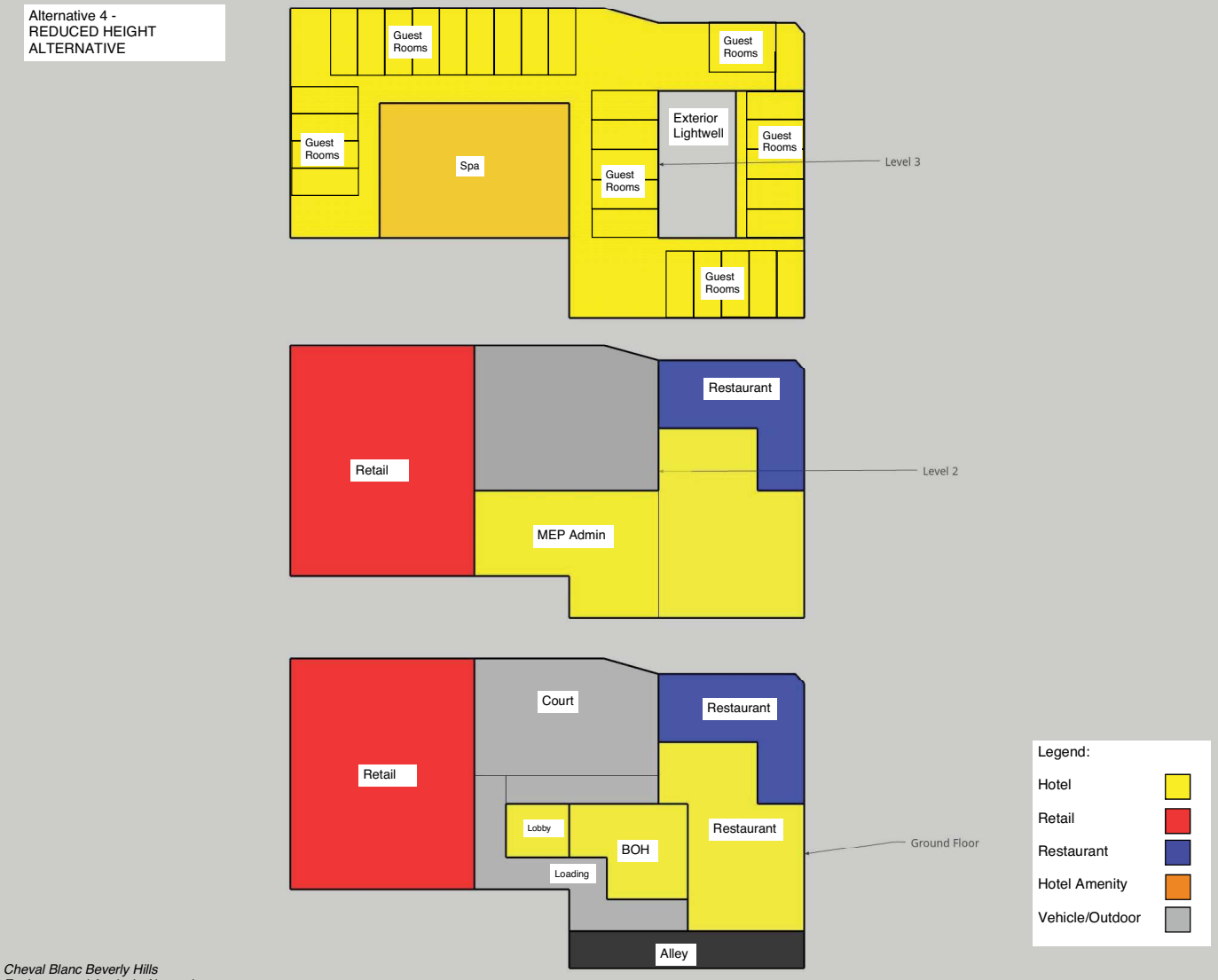

Figure 5.0-11

Alternative 4: Reduced Height Alternative, Floorplans for the Ground Level through Level 3

Source: Eyestone Environmental, 2022.

Figure 5.0-12

Alternative 4: Reduced Height Alternative, Floorplans for Level 4 through Level 6

Source: Eyestone Environmental, 2022.

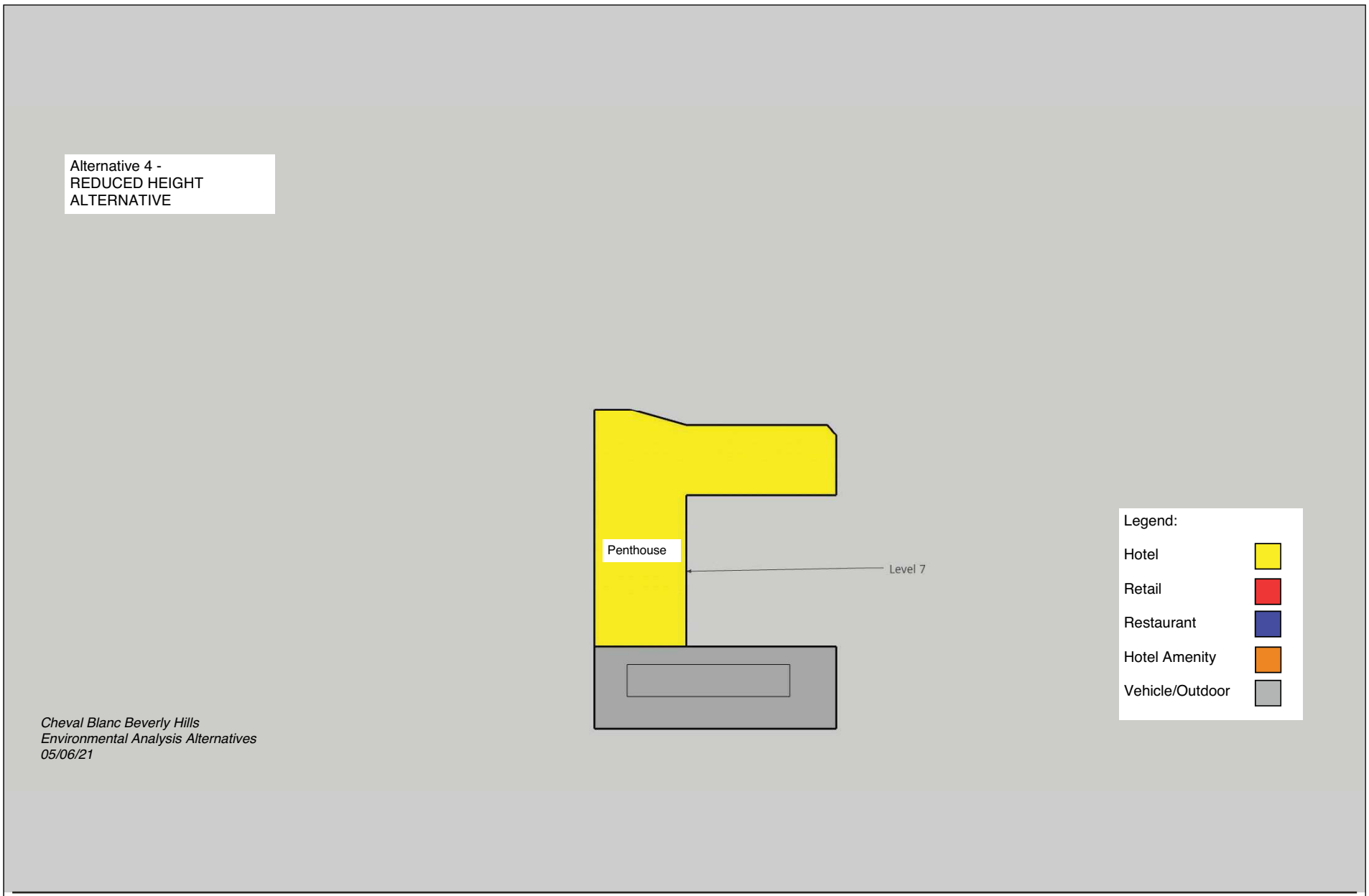

Figure 5.0-13

Alternative 4: Reduced Height Alternative, Floorplan for Level 7

Source: Eyestone Environmental, 2022.

As with the Project, the ground floor under Alternative 4 would include retail uses along North Rodeo Drive and South Santa Monica Boulevard and restaurant uses along South Santa Monica Boulevard and North Beverly Drive. Back of house uses would also be provided on the ground floor, rather than on the second and third floors as proposed by the Project. Additionally, as with the Project, the second floor under Alternative 4 would include additional retail and dining options. Furthermore, as with the Project, the third through fifth floors would include hotel guest rooms, in addition to the hotel amenities described above. Lastly, as with the Project, the sixth floor would include hotel guest rooms, a restaurant, and a pool deck, though the restaurant would overlook North Rodeo Drive under Alternative 4 rather than South Santa Monica Boulevard. The seventh floor under Alternative 4 would comprise the penthouse level, which would include penthouse suite(s) and amenities, including a penthouse pool. The Project's proposed eighth and ninth floors would be eliminated under Alternative 4, which would otherwise include hotel guest rooms, the proposed wellness center, and back of house areas on the eighth floor, and a penthouse suite(s) and amenities, including a penthouse pool, on the ninth floor.

Alternative 4 would be 89 feet in height across the entire site, rather than incorporate building step backs with lower heights on North Rodeo Drive and taller portions of the structure on North Beverly Drive. Alternative 4 eliminates recessed windows, balconies and overhangs that are incorporated throughout the Project, which shade window glazing while allowing deflected and diffused daylight into the building and reduce the need for artificial light sources. Due to this redistribution of building massing, Alternative 4 would involve a significant reduction in access to natural light for a large number of guest rooms, as well as the club, wellness center, spa and gym uses. Alternative 4 would also eliminate the building step backs on North Rodeo Drive, South Santa Monica Boulevard and North Beverly Boulevard as well as guest terraces and greenery. Alternative 4's design and architectural features would include shear sides and blocky massing and a lack of modulation or articulation.

Alternative 4 would feature similar vehicular, pedestrian, and bicycle access as the Project. As with the Project, Alternative 4 would provide ~~178~~185 vehicle parking spaces for the proposed uses in three subterranean parking levels beneath the hotel building. Primary access to the building and parking would be from South Santa Monica Boulevard from a valet motor court. The existing alley that runs north-south and is currently accessed from South Santa Monica Boulevard would be removed and relocated to the southern portion of the Project Site. The new access point to the alley would be from the west side of North Beverly Drive, similar to the Project.

As with the Project, the proposed valet motor court on South Santa Monica Boulevard would be used for drop-off and pick-up for hotel guests, club members, spa, retail and restaurant patrons. Employee and valet driven vehicles would enter Alternative

4's subterranean parking from the relocated alley off North Beverly Drive. Employees and small delivery vans would enter and exit the subterranean parking through the existing alley. Full size delivery facilities would be provided at grade accessible via the relocated alley. Valet driven vehicles would return from the subterranean garage to the motor court via ground level on-site internal circulation.

As with the Project, primary pedestrian access to the Project Site would be provided through the hotel entrance along South Santa Monica Boulevard. Retail spaces along North Rodeo Drive would have separate pedestrian access points from the sidewalk along the street. The primary access to the ground floor restaurant would occur through the hotel lobby/motor court area. Additional ancillary pedestrian restaurant access points may be provided on South Santa Monica Boulevard and/or North Beverly Drive. Lastly, the Project's proposed ground floor lobby to the private club with a pedestrian entrance on North Beverly Drive would be eliminated under Alternative 4.

Open spaces and landscaping under Alternative 4 would be largely eliminated. Specifically, Alternative 4 would eliminate the Project's proposed garden porte cochere over the motor court; the 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven; the publicly-accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork; the 742-square-foot outdoor terrace on the seventh level; the wellness center outdoor area; the hotel room balcony/patio areas; and the majority of the outdoor landscaping. The remaining open space would consist of the pool decks on the sixth and seventh floors. Alternative 4 would increase the number of trees on-site from zero to 7 trees and replace the 15 street trees adjacent to the Project Site on a 1:1 basis, for a combined total of 22 trees.

As with the Project, construction of Alternative 4 would be anticipated to commence in 2022 with buildout completed by 2026. Similar to the Project, construction activities would include demolition of existing uses, grading and excavation, and construction of a new structure and related infrastructure. As with the Project, excavation for the three proposed subterranean levels under Alternative 4 would extend to a depth of 44 feet, with 124,920 cubic yards of exported soil. Between the hours of 7:00 P.M. to 10:00 P.M., the designated outbound (leaving the Project Site) haul route is anticipated to be from the Project Site to eastbound South Santa Monica Boulevard to Burton Way to San Vicente Boulevard to southbound La Cienega Boulevard to Interstate 10. The reverse of this route would be used for inbound truck traffic from 7:00 P.M. to 10:00 P.M. Between the hours of 10:00 P.M. to 7:30 A.M., the designated outbound haul route is anticipated to be from the Project Site to southbound Beverly Drive to eastbound Wilshire Boulevard to southbound La Cienega Boulevard. Between the hours of 10:00 P.M. to 7:30 A.M., the inbound haul route would be from Interstate 10 to northbound La Cienega Boulevard to westbound

Wilshire Boulevard to northbound North Camden Drive to eastbound South Santa Monica Boulevard to the Project Site. It is noted that intermittent lane closures associated with construction of the future Metro D (formerly Purple) Line Rodeo Station are anticipated to occur on Beverly Drive through 2024. When periodic lane closures associated with the Metro station construction occur on Beverly Drive and/or Wilshire Boulevard, the nighttime haul trucks would utilize the evening (7:00 P.M. to 10:00 P.M.) haul route described above.

Alternative 4 would require the same discretionary entitlements as the Project listed in Section 2.0, Project Description, of this Final EIR.

5.4.2 Environmental Impacts

5.4.2.1 Air Quality

5.4.2.1.1 Regional Emissions

5.4.2.1.1.1 Construction

As with the Project, construction of Alternative 4 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. As discussed in Section 4.1, Air Quality, of this Final EIR, construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under Alternative 4, construction activities would be the same as the Project due to the development of the same floor area, uses, and parking as the Project. Consequently, the intensity of air emissions and fugitive dust from site preparation and construction activities would be the same as the Project. Therefore, as with the Project, total contributions to regional air pollutant emissions during construction under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.1.1.2 Operation

As with the Project, operational regional air pollutant emissions associated with Alternative 4 would be generated by vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As previously discussed, Alternative 4 would consist of the same floor area as the Project. As such, the number of net new daily vehicle trips and VMT generated by Alternative 4 would be the same as the Project. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by

Alternative 4 would be similar to the emissions generated by the Project. In addition, both area sources and stationary sources would also generate on-site operational air emissions similar to the Project. Therefore, under Alternative 4, total contributions to regional air pollutant emissions during operation would be similar to the Project's contribution. Thus, impacts to regional air quality under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.1.2 Localized Emissions

5.4.2.1.2.1 Construction

As Alternative 4 would develop the Project Site similar to the Project and construct the proposed building within the same footprint as the Project, construction activities associated with Alternative 4 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 4 would also be similar to those of the Project. Therefore, as with the Project, localized impacts under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.1.2.2 Operation

Localized operational impacts are determined primarily by traffic volumes. As discussed above, Alternative 4 would include the same uses and floor area as the Project. As such, the number of daily trips generated by Alternative 4 would be similar to the Project. In addition, as with the Project, Alternative 4 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 4 also would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.1.3 Toxic Air Contaminants

5.4.2.1.3.1 Construction

As with the Project, construction of Alternative 4 would generate diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. These activities represent the greatest potential for TAC emissions. As discussed in Section 4.1, Air Quality, of this Final EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. As with the Project, the construction phases which require the most heavy-duty diesel vehicle usage, such as site grading, would last for a short duration. Thus, construction of Alternative 4 also would not result in a

substantial, long-term (i.e., 70-year) source of TAC emissions. Thus, impacts due to TAC emissions under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.1.3.2 Operation

As set forth in Section 4.1, Air Quality, of this Final EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 4, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be similar to the Project since similar uses proposed by the Project would be constructed as part of Alternative 4. Similar to the Project, the land uses proposed under Alternative 4 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 4 would not release substantial amounts of TACs, and impacts would be less than significant. Such impacts would be similar to the less-than-significant impacts of the Project.

5.4.2.2 Biological Resources

As with the Project, Alternative 4 would require the removal of 15 street trees that would be replaced at a 1:1 basis. As discussed in Section 4.2, Biological Resources, of this Final EIR, based on the results of the daytime bat habitat assessment and survey, there is marginal roosting habitat for bats in the 15 street trees lining the sidewalks and no suitable habitat in the on-site buildings. Because the 12 palm street trees appear to provide marginal bat roosting habitat, impacts to bats and roosts could be potentially significant under the Project. Therefore, as with the Project, Alternative 4 has the potential to impact bats and roosts. However, Alternative 4 would implement the same mitigation measures as the Project in order to mitigate potential impacts to bats and roosts to a less than significant level. Therefore, the potential for direct impacts to biological resources as a result of removal of the street trees would be less than significant with mitigation under this alternative, and such impacts would be similar to the Project.

5.4.2.3 Cultural Resources

5.4.2.3.1 Historical Resources

As with the Project, Alternative 4 would require demolition of the existing buildings. As determined in the Historic Resource Assessment Reports included in Appendix D of this Final EIR, the existing on-site buildings do not qualify as historical resources. Therefore, the potential for direct impacts to historical resources as a result of removal of the existing buildings on-site would also be less than significant under this alternative.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 4 also has the potential to impact one historical resource located across the street from the Project Site, the Writers and Artists Building at 9507 S. Santa Monica Boulevard, due to potential structural vibration and settlement as a result of on-site vibration during construction. However, as provided in Section 4.8, Noise, of this Final EIR, the estimated vibration velocity levels from all construction equipment would be well below the building damage significance threshold for the Writers and Artists Building. As Alternative 4 would develop the Project Site with the same uses, floor area, and parking spaces as proposed by the Project, peak construction activities would be similar to the Project. As such, Alternative 4 would similarly not result in a significant indirect impact to historical resources in the vicinity of the Project Site as a result of vibration generated during construction of Alternative 4. Therefore, the potential for indirect impacts on adjacent historical resources would be less than significant under this alternative and such impacts would be similar to the Project.

Overall, impacts to historical resources under Alternative 4 would be less than significant, and similar to the less-than-significant impacts of the Project.

5.4.2.3.2 Archaeological Resources

As previously discussed, Alternative 4 would include the same amount of subterranean parking as proposed by the Project. Therefore, the potential for Alternative 4 to uncover subsurface archaeological resources would be similar when compared to that of the Project. Consequently, Alternative 4 would implement the same mitigation measure as the Project in order to mitigate potential impacts to archaeological resources to a less than significant level. Overall, similar to the Project, potential impacts to archaeological resources would be less than significant with mitigation, and such impacts would be similar to those of the Project, which would also be less than significant with mitigation.

5.4.2.4 Energy

5.4.2.4.1 Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

5.4.2.4.1.1 Construction

Similar to the Project, construction activities associated with Alternative 4 would consume electricity to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. As with the Project, Alternative 4 would also generate a demand for transportation energy associated with on- and off-road vehicles. Like the Project, construction activities associated with Alternative 4 would not involve the consumption of natural gas. The energy consumed during construction of Alternative 4

would be the same as that of the Project due to construction of the same floor area and uses. As with the Project, the electricity demand during construction of Alternative 4 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 4 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 4 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, construction activities energy use would not be wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

5.4.2.4.1.2 Operation

As with the Project, operation of Alternative 4 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As described above, Alternative 4 would result in the same amount of total floor area as the Project. Accordingly, the number of daily trips under Alternative 4 would be the same as for the Project. Therefore, the consumption of electricity, natural gas, and petroleum-based fuels would be similar to the Project. Like the Project, Alternative 4 would implement design features to reduce energy usage which would exceed Title 24 energy requirements. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 4 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.4.2 Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section 4.4, Energy, of this Final EIR, the current City of Beverly Hills Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 4 would comply with the City's Green Building Code, as well as be capable of achieving at least LEED® ~~Silver~~ Gold equivalent status, which include conservation features to reduce natural gas usage. Therefore, similar to the Project, Alternative 4 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 4 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green

Building Code. Therefore, as with the Project, Alternative 4 would not conflict with plans for renewable energy or energy efficiency. Impacts related to renewable energy or energy efficiency plans under Alternative 4 would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.5 Geology and Soils (Paleontological Resources)

As described above, Alternative 4 would include the same amount of subterranean parking as proposed by the Project. Therefore, the potential for uncovering paleontological artifacts that were not recovered during prior construction or other human activity would be similar when compared to that of the Project. Consequently, Alternative 4 would implement the same mitigation measures as the Project in order to mitigate potential impacts to paleontological resources to a less than significant level. Overall, similar to the Project, potential impacts to paleontological resources would be less than significant with mitigation, and such impacts would be similar to the less than significant with mitigation impacts of the Project.

5.4.2.6 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 by energy consumption from proposed land uses. As previously discussed, the number of daily trips and VMT as well as the amount of energy required by Alternative 4 would be similar to the Project due to the development of the same uses and total floor area as the Project. Thus, the amount of GHG emissions generated by Alternative 4 would be similar to the amount generated by the Project. As with the Project, Alternative 4 would be designed to comply with the requirements of the CALGreen Code and the Beverly Hills Green Building Code. Alternative 4 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED® ~~Silver~~ Gold or equivalent green building standards. However, Alternative 4 eliminates recessed windows, balconies and overhangs that are incorporated throughout the Project, which shade window glazing while allowing deflected and diffused daylight into the building to enhance the use of natural light and reduce the need for artificial light sources. With compliance with the CALGreen Code and the Beverly Hills Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 4 also would not conflict with any applicable plan, policy, regulation, or recommendation to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 4 would be less than significant, and such impacts would be similar to the less-than-significant impacts of the Project.

5.4.2.7 Land Use and Planning

As previously described, Alternative 4 would develop the Project Site with the same uses and floor area as the Project. However, with the introduction of one uniform height across the building, achieved by shear sides and blocky massing, this alternative would eliminate the Project's proposed trellis-like garden porte cochere over the motor court, the publicly-accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork, the 742-square-foot outdoor terrace on the seventh level, the hotel room balcony/patio areas, and the majority of the outdoor landscaping. The remaining open space would consist of the pool decks on the sixth and seventh floors. This alternative would also eliminate the various design elements of the building proposed by the Project. In particular, as discussed throughout Section 4.7, Land Use and Planning, of this Final EIR, the Project has been designed to respect the scale of the surrounding uses by locating the lower heights of the building along the North Rodeo Drive frontage and at the intersection of North Rodeo Drive with Santa Monica Boulevard. Taller building heights would be placed along Santa Monica Boulevard (up to 6 stories, 78.5 feet in height) and North Beverly Drive (up to 9 stories, 115 feet in height), transitioning to a similar height as the existing building located to the east across North Beverly Drive (the 110-foot tall Bank of America building). In comparison, Alternative 4 would be 89 feet in height across the entire site, eliminating the Project's building step backs on North Rodeo Drive, South Santa Monica Boulevard, and North Beverly Boulevard, that result in the Project's lower heights on North Rodeo Drive and taller portions of the structure on North Beverly Drive. Due to this redistribution of building massing, Alternative 4 would also involve a significant reduction in access to natural light for a large number of guest rooms, as well as the club, wellness center, spa and gym uses. .

Based on the building design constraints of Alternative 4, this alternative would not support certain goals and policies of the City regarding site planning, architectural design, community character, and landscaping. Specifically, this alternative would not support the City's Goal LU-2 to provide a built environment that is distinguished by its high level of site planning, architecture, landscape design, and sensitivity to its natural setting and history to the same degree as the Project. Similarly, Alternative 4 would not support to the same extent as the Project the City's Policies LU-2.4 and Policy LU-11.2, which require that new construction and renovation of existing buildings and properties exhibit a high level of excellence in site planning, architectural design, landscaping, and amenities and that commercial and office properties and buildings are planned and designed to exhibit a high level of site and architectural design quality and excellence, respectively. With elimination of the Project's various open space areas, Alternative 4 would not meet the City's Policy LU-16.4 and Policy OS-6.3 to provide plazas, open spaces, and other outdoor improvements that are accessible to and used for public gatherings and activities, and to

require that new development be located and designed to visually complement the urban setting by providing accessible, landscaped entries, courtyards, and plazas.

In summary, while Alternative 4 would develop the Project Site with the same uses and floor area as the Project, with the introduction of one uniform height across the building, this alternative would eliminate many of the Project's features and the various design elements of the building proposed by the Project which support the City's goals, objectives, and policies. As such, this alternative conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans under Alternative 4 would be potentially significant and greater than the less-than-significant impacts of the Project.

5.4.2.8 Noise

5.4.2.8.1 Construction

5.4.2.8.1.1 On- and Off-Site Noise During Construction

The types and amounts of construction activities under Alternative 4 would be similar to the Project. As with the Project, construction of Alternative 4 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. On- and off-site construction activities and the associated construction noise levels would be expected to be similar to the Project during maximum (peak) activity days. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 4 would comply with the same applicable regulatory requirements and implement similar design features as the Project to reduce noise levels during construction. Therefore, as with the Project, on-site and off-site construction noise impacts would be less than significant. Overall, construction-related noise impacts under Alternative 4 would be similar to those of the Project.

5.4.2.8.1.2 Vibration During Construction

As noted above, the types of construction activities under Alternative 4 would be similar to the Project. As with the Project, construction of Alternative 4 would generate vibration from the use of heavy-duty construction equipment as well as from truck trips. As the overall amount of construction would be similar, on-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project during maximum (peak) activity days. As such, vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 4 would also implement similar design features and mitigation measure as the Project to reduce on-site vibration levels during construction. As such,

vibration impacts due to on-site construction activities under Alternative 4 would similarly be less than significant with mitigation for on-site construction vibration (building damage) and less than significant for on-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 4 would be similar to the impacts of the Project.

5.4.2.8.2 Operation

5.4.2.8.2.1 On- and Off-Site Noise During Operation

As discussed in Section 4.8, Noise, of this Final EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as outdoor mechanical equipment, activities at or within the proposed outdoor spaces, parking facilities, and loading dock; and (b) off-site mobile (roadway traffic) noise sources.

Alternative 4 would introduce noise from similar on-site and off-site noise sources as the Project. Due to the development of the same uses as the Project, the noise levels generated during Alternative 4 would be anticipated to be similar to the noise levels of the Project although such noise levels may be directed towards other areas of the building and surrounding uses due to the design changes of the building, including the reorientation of the Project's proposed U-shaped building to the south, such that the bulk of its massing would be positioned between the outdoor spaces where the proposed uses will include amplified noise and the residential neighborhoods to the north. Specifically, under Alternative 4, the outdoor pool deck at the sixth floor would be located on the south side of the building and would be wrapped by the hotel building on the west, north and east sides, which would shield the pool deck to the residential uses to the north. In addition, the outdoor terraces at Level 7 and Level 8 under the Project would be eliminated under Alternative 4. Finally, the outdoor pool deck at the penthouse level under Alternative 4 would be located at the south side of the building, with the building at the north side providing shielding to the residential uses to the north. By comparison, the outdoor spaces under Alternative 4 would be less than the Project and the building layout would provide shielding to the residential uses to the north. Therefore, as with the Project, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, Alternative 4 would generate a similar amount of daily vehicle trips as the Project. As such, Alternative 4 would result in similar off-site traffic-related noise levels as the Project. Therefore, as with the Project, off-site noise impacts under Alternative 4 would be less than significant and such impacts would be similar to those of the Project.

5.4.2.8.2.2 Vibration During Operation

As discussed in Section 4.8, Noise, of this Final EIR, sources of vibration related to operation under the Project would include (a) vehicle circulation, (b) delivery trucks, and (c) building mechanical equipment. Vehicular-induced vibration, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. Building mechanical equipment installed as part of the Project would include typical commercial-grade stationary mechanical equipment, which would include vibration-attenuation mounts to reduce vibration transmission so vibration would not be perceptible at the off-site sensitive receptors.

Alternative 4 would introduce vibration from similar vibration sources as the Project. Due to the development of the same uses as the Project, the vibration levels generated during Alternative 4 would be anticipated to be similar to the vibration levels of the Project. Thus, operational vibration impacts would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.9 Transportation

As discussed above, Alternative 4 would be developed within the same Project Site as the Project; therefore, the plans, policies, and programs applicable to the Project would also apply to Alternative 4.

With regard to construction, Alternative 4, the Reduced Height Alternative, would develop the Project Site with the same uses, floor area, and parking spaces as proposed by the Project, providing the same 220,950 square feet of floor area as the Project. The types of construction activities under Alternative 4 would also be similar to the Project. As with the Project, construction of Alternative 4 would generate construction-related traffic from haul trucks and construction workers and would also require the delivery and staging of construction and materials and equipment. As such, similar to the Project, potential construction-related transportation impacts could also result during construction of Alternative 4. Such impacts would be the same as for the Project since construction activities and the associated construction traffic levels would be expected to be similar to the Project during maximum (peak) activity days and occur over a similar construction period duration. As such, transportation-related impacts during construction would be similar to those of the Project. Alternative 4 would also implement similar mitigation as the Project to reduce potential construction-related transportation impacts to a less-than-significant level. Therefore, as with the Project, construction-related transportation impacts would be less than significant with mitigation, similar to those of the Project.

Alternative 4 would include the same uses as the Project but would eliminate the Project's proposed publicly-accessible 670-square-foot pedestrian plaza at the corner of

South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork; the garden porte cochere over the motor court, and the majority of the outdoor landscaping. Overall, as with the Project, Alternative 4 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 4 would be consistent with the City of Beverly Hills General Plan, the City's Draft Complete Streets Plan, the LA Metro First Last Mile Strategic Plan, and the SGAG RTP/SCS. Similar to the Project, Alternative 4 would reduce vehicle trips and VMT by encouraging the use of alternative modes of transportation by providing convenient and adequate bicycling facilities. As such, Alternative 4 would comply with the programs and policies set forth in the City of Beverly Hills General Plan, the City's Draft Complete Streets Plan, and the LA Metro First Last Mile Strategic Plan, and the SGAG RTP/SCS. Thus, transportation impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, similar to the Project, Alternative 4 meets Screening Criteria 2 and Screening Criteria 4 discussed in detail in Section 4.9, Transportation, of this Final EIR. Based on the screening criteria, Alternative 2 would have a less than significant VMT impact and is screened out from further VMT analysis. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be similar to the less-than-significant impacts of the Project.

As with the Project, Alternative 4 would not introduce hazardous design features such as sharp curves or hazardous uses. In addition, as with the Project, relocation of the alley to provide access from North Beverly Drive would not substantially increase hazards or result in an incompatible use. Thus, impacts related to increased hazards due to a design feature or incompatible uses would continue to be less than significant under Alternative 4 and such impacts would be similar to the less than significant impacts of the Project.

With regard to emergency access, during construction of Alternative 4, travel lanes would be maintained in both directions in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access, similar to the Project. During operation, Alternative 4 also would not involve the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, like the Project, Alternative 4 would comply with Beverly Hills Fire Department access requirements and applicable Beverly Hills Fire Department regulations regarding safety. Therefore, Alternative 4 also would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts regarding inadequate emergency access would be less than significant, and similar to the less than significant impacts of the Project.

5.4.2.10 Tribal Cultural Resources

As described above, Alternative 4 would include the same amount of subterranean parking as proposed by the Project. Therefore, the potential for Alternative 4 to uncover subsurface tribal cultural resources would be similar when compared to that of the Project. In addition, as discussed in Section 4.10, Tribal Cultural Resources, of this Final EIR, no known recorded tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site. Nevertheless, Alternative 4 would implement the same mitigation measures as the Project in order to mitigate potential impacts to tribal cultural resources to a less than significant level. Overall, similar to the Project, potential impacts to tribal cultural resources would be less than significant with mitigation.

5.4.2.11 Utilities and Service Systems (Energy Infrastructure)

5.4.2.11.1 Construction

As discussed above, Alternative 4 would require a similar amount of energy needed for construction activities as that of the Project. As discussed in Section 4.11, Utilities and Service Systems—Energy Infrastructure, of this Final EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 4 would generate a similar demand for energy during construction as the Project, the energy demand of Alternative 4 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity would be less than significant and similar to the less-than-significant impacts of the Project.

5.4.2.11.2 Operation

As previously discussed, the total energy consumption of Alternative 4 would be similar to that of the Project. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 4. Impacts related to energy infrastructure would be less than significant under Alternative 4 and similar to the less-than-significant impacts of the Project.

5.4.3 Comparison of Impacts

As analyzed above, while Alternative 4 would redistribute the massing of the hotel building to reduce the overall height to 89 feet consisting of seven stories as well as reorient the Project's proposed U-shaped building to the south, this alternative would develop the same uses, floor area, and parking as the Project. As such, Alternative 4 would not eliminate any of the Project's impacts which are less than significant or less than significant with mitigation. In addition, Alternative 4 would result in greater impacts with

regard to land use and planning as Alternative 4 would not be consistent with applicable land use policies. Overall, impacts under Alternative 4 would be less, similar, or greater than those of the Project.

5.4.4. Relationship of the Alternative to Project Objectives

With a similar mix of uses, and the same floor area and FAR as the Project, Alternative 4 would achieve the following Project objectives:

- Support and expand tourism and business activity by developing new lodging opportunities that are easily accessible to entertainment and commercial destinations in the City of Beverly Hills.

- Reduce vehicular trips and promote local and regional mobility objectives by developing a hotel use with convenient access to a variety of alternative transportation options including walking, biking, and public transit, and in close proximity to popular tourist destinations.

- To accommodate vehicle flow on adjacent City streets and promote multiple transportation modes (walking, bicycling) by relocating the alley bisecting the Project Site, placing parking underground, limiting driveway access points, and enhancing the pedestrian environment on all of the adjoining streets.

However, Alternative 4 would not meet the following objectives of the Project due to the reduction of the Project's proposed streetscape improvements, elimination of the building step backs, articulation, and modulation in lieu of a shear-sided, blocky massing; elimination of the publicly-accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork; elimination of the majority of the private and common open space including guest terraces; elimination of the trellis-like garden porte cochere over the motor court; elimination of the majority of the outdoor landscaping; and a significant reduction in access to natural light for a large number of guest rooms, as well as the club, wellness center, spa and gym uses.

- Provide short- and long-term employment opportunities and maximize transient occupancy tax revenue for the City through the development of a luxury hotel that will attract visitors to the Beverly Hills Business Triangle.

- Replace existing uses and structures with an economically viable and aesthetically attractive development on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.

- Improve the pedestrian experience and enhance walkability through a pedestrian friendly design that includes pedestrian amenities at ground level.

Overall, while the Reduced Height Alternative provides the same square footage of building and FAR as the Project, as well as the same number of hotel rooms and range of uses, in order to reduce the height on the physically-constrained Project Site, building step backs, modulation and articulation are eliminated, and a large number of guest rooms as well as the restaurant, spa, wellness center with gym, and club uses have very limited access to natural light. The majority of private and publicly accessible open space is eliminated, as is greenery at the façade, and the majority of the sidewalk improvements. As such, Alternative 4 would not provide a high quality hotel development project, although it would provide a publicly accessible neighborhood-serving ground floor restaurant and bar use to encourage pedestrian activity in the vicinity of the Project Site. Alternative 4 would only partially meet the underlying purpose of the Project.

5.0 Alternatives

5.5 Alternative 5: Reduced Project Alternative

5.5.1 Description of the Alternative

Alternative 5, the Reduced Project Alternative, would develop the Project Site similar to the Project but at a reduced scale, including by eliminating the third subterranean level proposed under the Project as well as all publicly-accessible uses except for the ground-floor retail on Rodeo Drive.

Overall, Alternative 5 would provide 168,403 square feet with a FAR of 3.0:1 above-ground FAR and 3.2:1 total FAR as compared to the 220,950 square feet of floor area and 3.91:1 above-ground FAR and 4.2:1 total FAR of the Project (a reduction of 52,546 square feet). ~~The~~ As shown in Figure 5.0-14 through Figure 5.0-21 on pages 5.0-91 through 5.0-98, the proposed 85-room hotel building (a reduction of 30 guest rooms compared to the Project) would consist of five stories with a maximum height of 66 feet along North Rodeo Drive (an increase of 15 feet as compared to the proposed four stories and 51 feet of the Project along North Rodeo Drive) and seven stories with a maximum height of 95 feet (a reduction of 20 feet in height as compared to the nine stories with a maximum height of 115 feet of the Project along North Rodeo Drive).

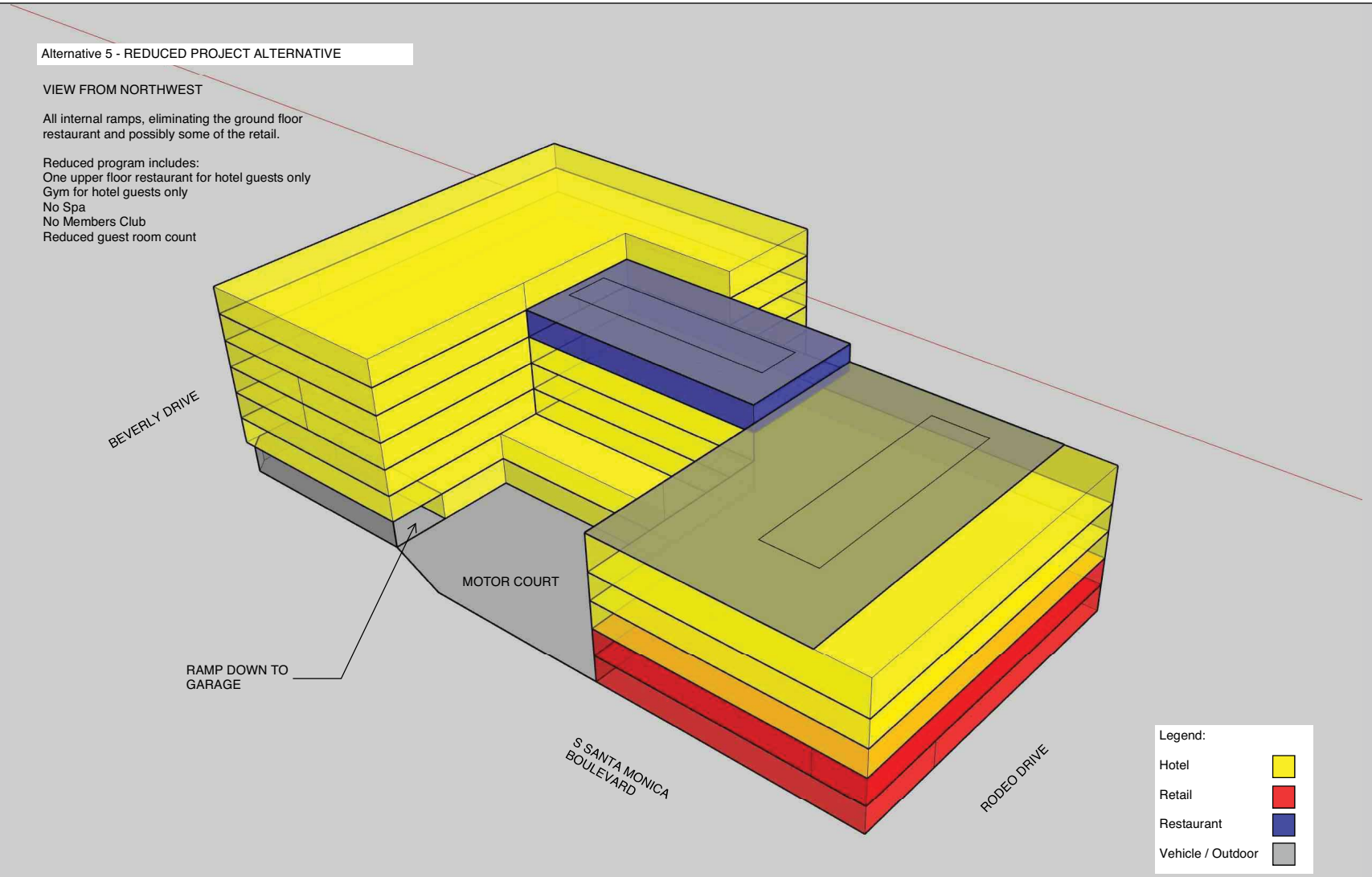

Figure 5.0-14

Alternative 5: Reduced Project Alternative, View from the Northwest

Source: Eyestone Environmental, 2022.

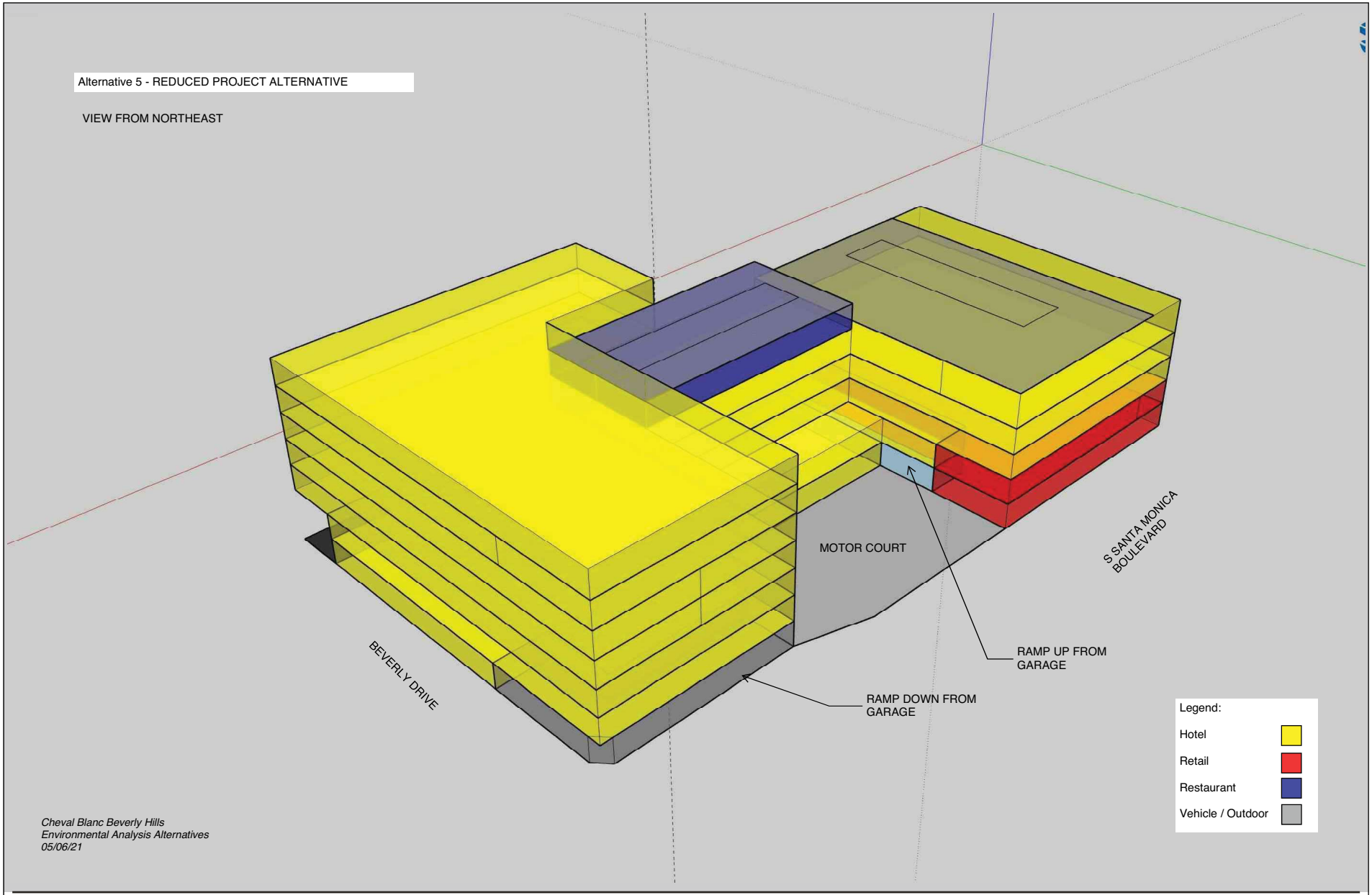

Figure 5.0-15

Alternative 5: Reduced Project Alternative, View from the Northeast

Source: Eyestone Environmental, 2022.

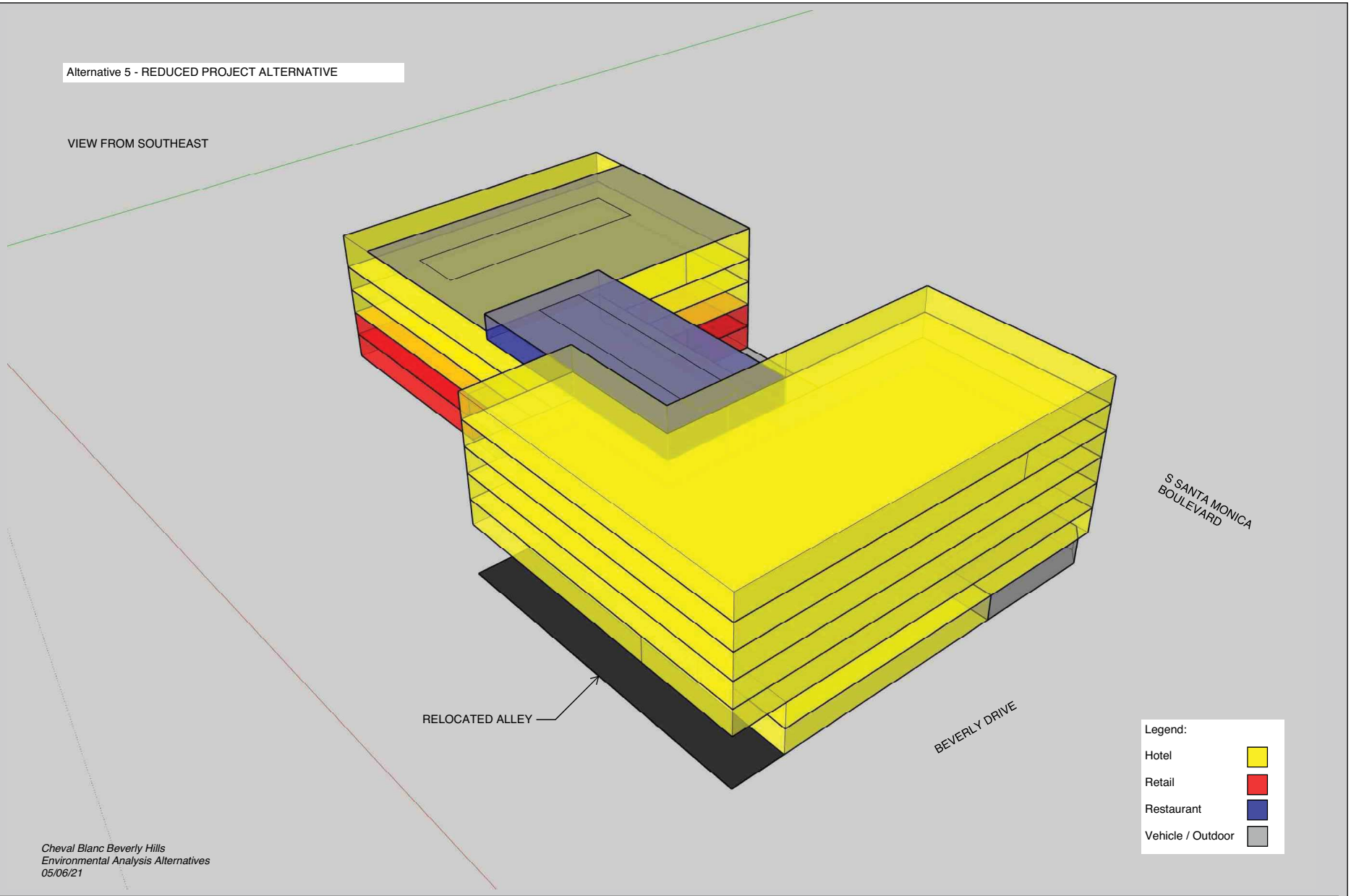

Figure 5.0-16

Alternative 5: Reduced Project Alternative, View from the Southeast

Source: Eyestone Environmental, 2022.

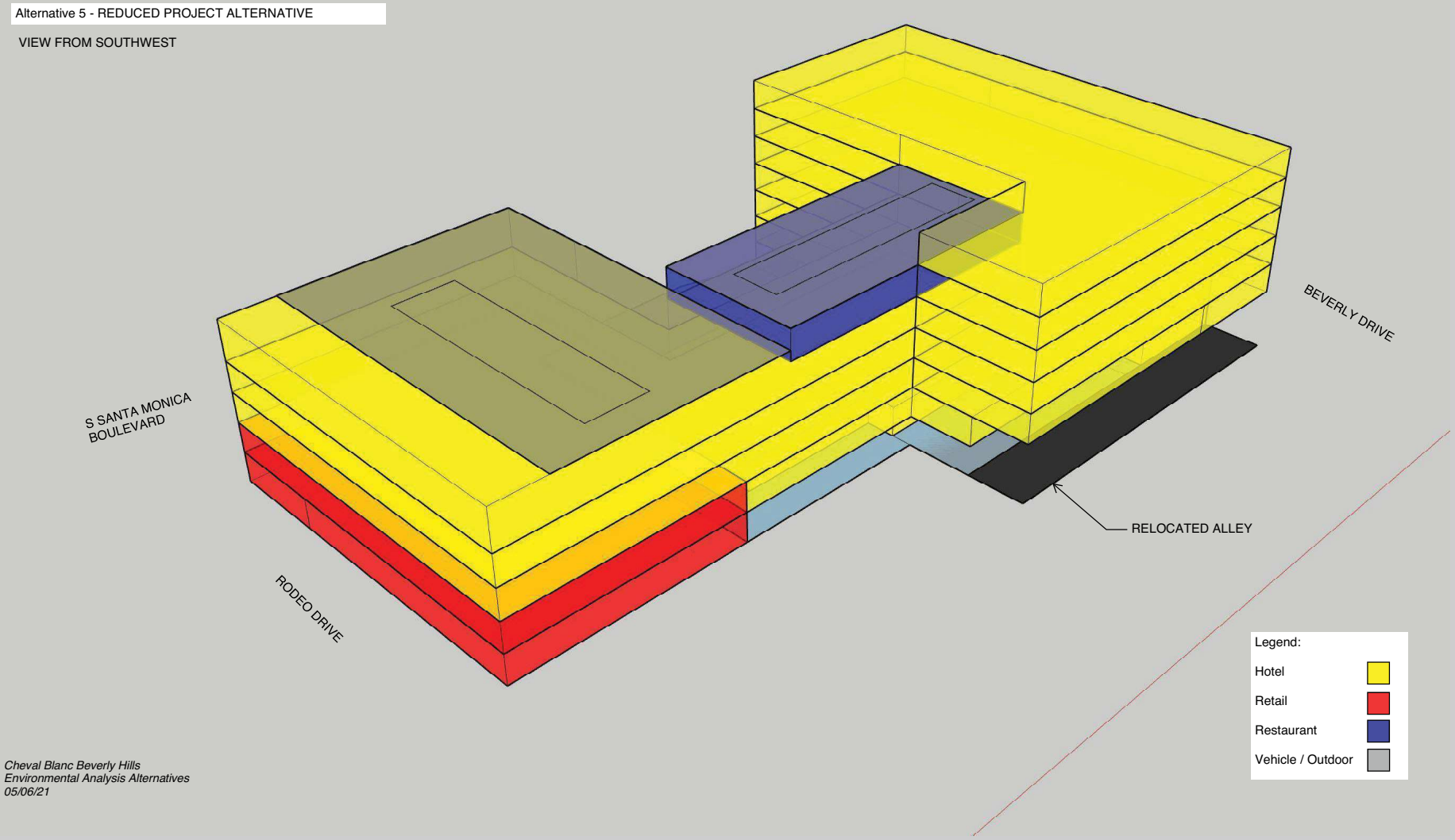

Figure 5.0-17

Alternative 5: Reduced Project Alternative, View from the Southwest

Source: Eyestone Environmental, 2022.

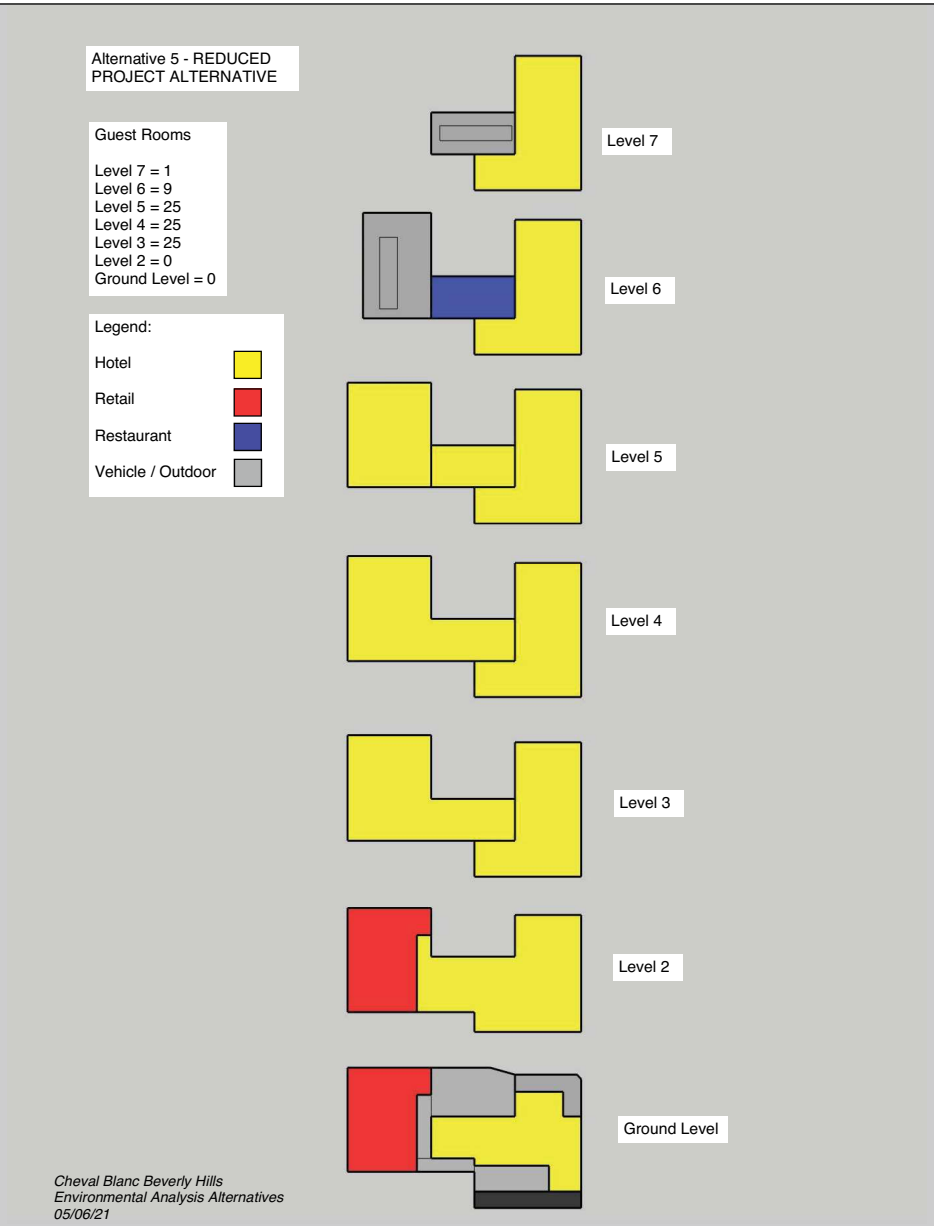

Figure 5.0-18

Alternative 5: Reduced Project Alternative, Floorplans for All Levels

Source: Eyestone Environmental, 2022.

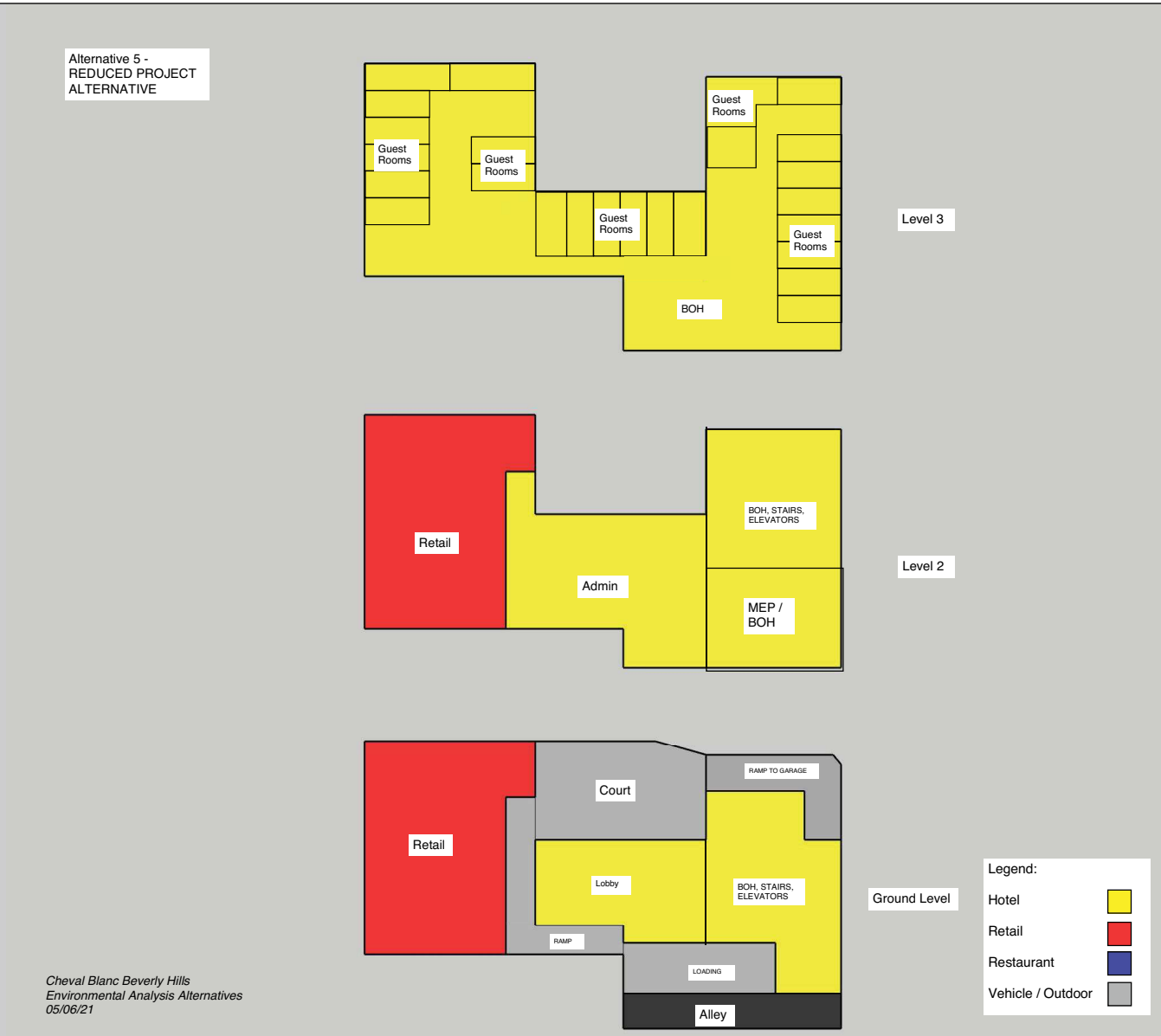

Figure 5.0-19

Alternative 5: Reduced Project Alternative, Floorplans for the Ground Level through Level 3

Source: Eyestone Environmental, 2022.

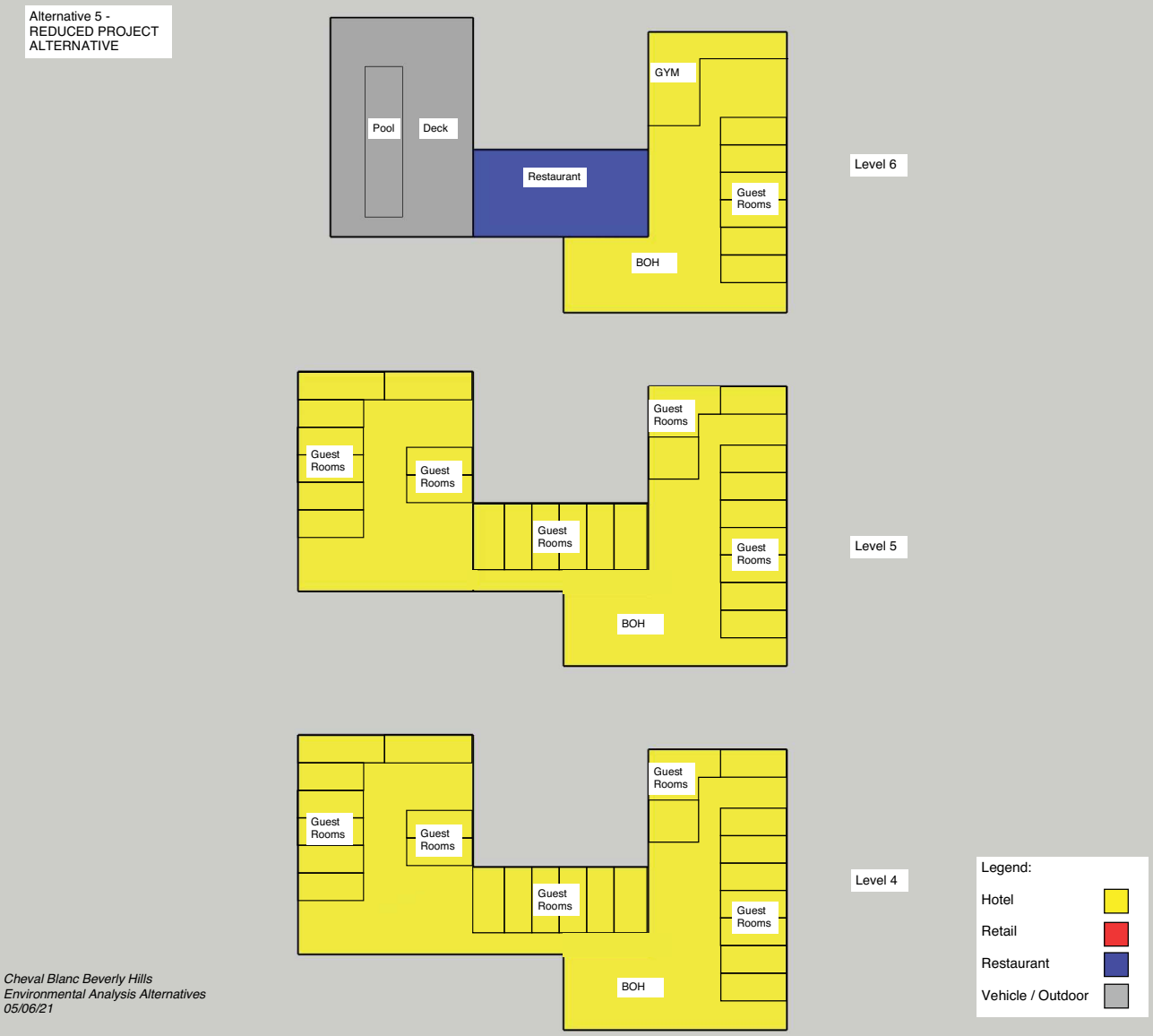

Figure 5.0-20

Alternative 5: Reduced Project Alternative, Floorplans for Level 4 through Level 6

Source: Eyestone Environmental, 2022.

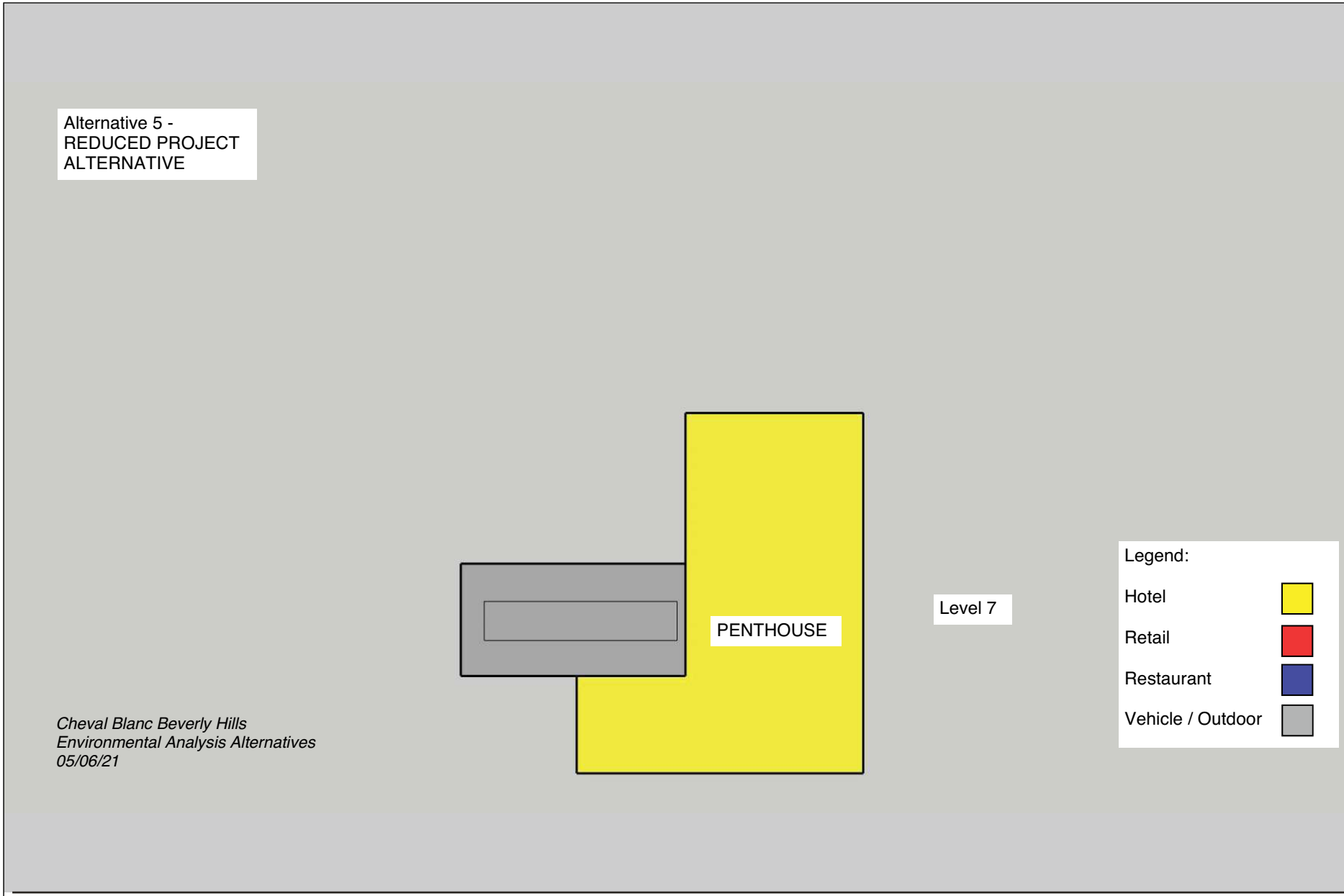

Figure 5.0-21

Alternative 5: Reduced Project Alternative, Floorplan for Level 7

Source: Eyestone Environmental, 2022.

Alternative 5 would eliminate the Project's proposed private club and also eliminate the publicly accessible, ground floor restaurant on the corner of South Santa Monica Boulevard and North Beverly Drive and replace it with a vehicle down ramp internal to the Project Site, as well as reduce the floor area of the wellness center and spa and the sixth-floor restaurant. The remaining restaurant and the wellness center and spa on the sixth floor would be reduced in size and available to hotel guests only.

The overall design of the building under Alternative 5 differs from the Project by using shear sides and blocky massing to achieve a lower height, eliminating the Project's stepped back, modulated and articulated design. The façade lacks the Project's guest terraces and greenery, and lacks the trellis-like garden porte cochere. Alternative 5 would feature similar pedestrian and bicycle access as the Project. Vehicular access would also be similar to the Project, but all ramps would be internal to the Project Site and accessed from the motor court, as described further below.

Parking would be provided in two subterranean levels (a reduction of one subterranean level when compared to the Project's three proposed subterranean levels) with a total of 94 parking spaces (a reduction of ~~84~~91 parking spaces when compared to the Project's proposed ~~178~~185 parking spaces). As with the Project, primary access to the building and parking would be from South Santa Monica Boulevard from a valet motor court. The existing alley that runs north-south and is currently accessed from South Santa Monica Boulevard would be removed and relocated to the southern portion of the Project Site. The new access point to the alley would be from the west side of North Beverly Drive.

As with the Project, primary pedestrian access to the Project Site would be provided through the hotel entrance along South Santa Monica Boulevard. Retail spaces along North Rodeo Drive would have separate pedestrian access points from the sidewalk along the street. Additionally, the Project's proposed ground floor lobby to the private club with a pedestrian entrance on North Beverly Drive would be eliminated under Alternative 5, as would the private club.

As with the Project, under Alternative 5, the proposed valet motor court on South Santa Monica Boulevard would be used for drop-off and pick-up for hotel guests and spa, retail, and restaurant patrons. Employees, valet driven guest vehicles, and small delivery, service and utility vans would enter and return from Alternative 5's subterranean parking through the motor court, while full-size delivery vans would access a loading dock through the relocated alley off North Beverly Drive. By comparison, under the Project, employee and valet driven guest vehicles and small delivery, utility and service vans would enter the Project's subterranean parking from the relocated alley off North Beverly Drive. Employees and small delivery utility and service vans exit the subterranean parking southbound via the alley, and valet driven vehicles would return from the subterranean garage to the motor

court via ground level on-site internal circulation. Full-size delivery vans would access the Project's at grade full-size loading docks via the relocated alley and exit southbound down the alley.

Open spaces and landscaping under Alternative 5 would be greatly reduced. Specifically, Alternative 5 would eliminate the Project's proposed 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven; the publicly-accessible 670-square-foot pedestrian plaza at the corner of South Santa Monica Boulevard and North Rodeo Drive that would be contiguous to the sidewalk and include private artwork; the 742-square-foot outdoor terrace on the seventh level; the wellness center outdoor area; and the majority of the outdoor landscaping. The remaining open space and landscaping would consist of the pool decks on the sixth and seventh floors. Furthermore, similar to the Project, Alternative 5 would also increase the number of trees on-site from zero to 7 trees and replace the 15 street trees adjacent to the Project Site on a 1:1 basis, for a combined total of 22 trees.

With the reduction in uses and parking, construction of Alternative 5 would be reduced compared to the Project. Similar to the Project, construction activities would include demolition of existing uses, grading and excavation, and construction of a new structure and related infrastructure. Due to the elimination of the third subterranean level, the total depth of excavation required for Alternative 5 would be reduced from 44 feet to a depth of 35 feet (a reduction of nine feet when compared to the Project). Consequently, soil export for Alternative 5 would also be reduced as compared to the Project and would include 99,369 cubic yards of exported soil (a reduction of 25,551 cubic yards when compared to the Project's proposed 124,920 cubic yards of soil export). Between the hours of 7:00 P.M. to 10:00 P.M., the designated outbound (leaving the Project Site) haul route is anticipated to be from the Project Site to eastbound South Santa Monica Boulevard to Burton Way to San Vicente Boulevard to southbound La Cienega Boulevard to Interstate 10. The reverse of this route would be used for inbound truck traffic from 7:00 P.M. to 10:00 P.M. Between the hours of 10:00 P.M. to 7:30 A.M., the designated outbound haul route is anticipated to be from the Project Site to southbound Beverly Drive to eastbound Wilshire Boulevard to southbound La Cienega Boulevard. Between the hours of 10:00 P.M. to 7:30 A.M., the inbound haul route would be from Interstate 10 to northbound La Cienega Boulevard to westbound Wilshire Boulevard to northbound North Camden Drive to eastbound South Santa Monica Boulevard to the Project Site. It is noted that intermittent lane closures associated with construction of the future Metro D (formerly Purple) Line Rodeo Station are anticipated to occur on Beverly Drive through 2024. When periodic lane closures associated with the Metro station construction occur on Beverly Drive and/or Wilshire Boulevard, the nighttime haul trucks would utilize the evening (7:00 P.M. to 10:00 P.M.) haul route described above.

Alternative 5 would require the same discretionary entitlements as the Project, as listed in Section 2.0, Project Description, of this Final EIR.

5.5.2 Environmental Impacts

5.5.2.1 Air Quality

5.5.2.1.1 Regional Emissions

5.5.2.1.1.1 Construction

As with the Project, construction of Alternative 5 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 4.1, Air Quality, of this Final 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 5, construction activities would be reduced in comparison to the Project due to the reduction in floor area and excavation activities. However, the intensity of air emissions and fugitive dust from site preparation and construction activities would be similar on days with maximum construction activities. Therefore, as with the Project, total contributions to regional air pollutant emissions during construction under Alternative 5 would be less than significant. However, with the reduction of floor area and excavation activities, such impacts would be less than the less-than-significant impacts of the Project.

5.5.2.1.1.2 Operation

As with the Project, operational regional air pollutant emissions associated with Alternative 5 would be generated by daily vehicle trips to the Project Site, which are the largest contributors to operational air pollutant emissions, and the consumption of electricity and natural gas. As previously discussed, Alternative 5 would provide 168,403 square feet of floor area compared to the 220,950 square feet of floor area as proposed by the Project (a reduction of 52,546 square feet). As such, the number of net new daily vehicle trips and associated VMT generated by Alternative 5 would be less than the net new daily vehicle trips generated by the Project. Since the amount of vehicular emissions is based on the number of trips generated, the overall pollutant emissions generated by Alternative 5 would be less than the emissions generated by the Project, although not substantially so. In addition, both area sources and stationary sources would also generate on-site operational air emissions less than the Project. Therefore, under Alternative 5, total contributions to regional air pollutant emissions during operation would be less than the Project's

contribution. Thus, impacts to regional air quality under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

5.5.2.1.2 Localized Emissions

5.5.2.1.2.1 Construction

As Alternative 5 would develop the Project Site similar to the Project and construct the proposed building within the same footprint as the Project, construction activities associated with Alternative 5 would be located at similar distances from sensitive receptors as the Project. Since air emissions and fugitive dust from construction activities would be similar to those of the Project on maximum construction activity days, localized emissions under Alternative 5 would also be similar to those of the Project. Therefore, as with the Project, localized impacts under Alternative 5 would be less than significant. However, with the reduction of floor area and excavation activities, such impacts would be less than the less-than-significant impacts of the Project.

5.5.2.1.2.2 Operation

Localized operational impacts are determined primarily by traffic volumes. As described above, Alternative 5 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips and associated VMT under Alternative 5 would also be reduced. In addition, as with the Project, Alternative 5 would not introduce any new major sources of air pollution within the Project Site. Because the localized impacts analysis from on-site operational activities and the localized CO hotspot analysis associated with off-site operational activities for the Project did not result in any significant impacts, localized impacts under Alternative 5 would also be less than significant and less than the less-than-significant impacts of the Project.

5.5.2.1.3 Toxic Air Contaminants

5.5.2.1.3.1 Construction

As with the Project, construction of Alternative 5 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 4.1, Air Quality, of this Final EIR, the Project would result in less-than-significant impacts with regard to TAC emissions. Overall construction TAC emissions generated by Alternative 5 would be less than those of the Project since excavation activities required during construction of Alternative 5 would be reduced. As with the Project, the construction phases which require the most heavy-duty diesel vehicle usage, such as site grading, would last for a short duration. Thus, construction of Alternative 5 also would not result in a substantial, long-term (i.e., 70-year) source of TAC emissions.

Thus, impacts due to TAC emissions under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

5.5.2.1.3.2 Operation

As set forth in Section 4.1, Air Quality, of this Final EIR, the primary sources of potential TACs associated with Project operations would include diesel particulate matter from delivery trucks. Under Alternative 5, the overall increase in the number of deliveries and associated diesel particulate matter emissions would be less than the Project since Alternative 5 would include less uses. Similar to the Project, the land uses proposed under Alternative 5 are not considered land uses that generate substantial TAC emissions. Therefore, Alternative 5 would not release substantial amounts of TACs, and impacts would be less than significant. Such impacts would be less than the less-than-significant impacts of the Project.

5.5.2.2 Biological Resources

As with the Project, Alternative 5 would require the removal of 15 street trees that would be replaced at a 1:1 basis. As discussed in Section 4.2, Biological Resources, of this Final EIR, based on the results of the daytime bat habitat assessment and survey, there is marginal roosting habitat for bats in the 15 street trees lining the sidewalks and no suitable habitat in the on-site buildings. Because the 12 palm street trees appear to provide marginal bat roosting habitat, impacts to bats and roosts could be potentially significant under the Project. Therefore, as with the Project, Alternative 5 has the potential to impact bats and roosts. However, Alternative 5 would implement the same mitigation measures as the Project in order to mitigate potential impacts to bats and roosts to a less than significant level. Therefore, the potential for direct impacts to biological resources as a result of removal of the street trees lining the sidewalks would be less than significant with mitigation under Alternative 5, and similar to the impacts of the Project, which would be less than significant with mitigation.

5.5.2.3 Cultural Resources

5.5.2.3.1 Historical Resources

As with the Project, Alternative 5 would require demolition of the existing buildings. As determined in the Historic Resource Assessment Reports included in Appendix D of this Final EIR, the existing on-site buildings do not qualify as historical resources. Therefore, the potential for direct impacts to historical resources as a result of removal of the existing buildings on-site would also be less than significant under this alternative.

With regard to indirect impacts on adjacent historical resources, similar to the Project, Alternative 5 also has the potential to impact one historical resource located across the street from the Project Site, the Writers and Artists Building at 9507 S. Santa Monica Boulevard, due to potential structural vibration and settlement as a result of on-site vibration generated during construction of this alternative. However, as provided in Section 4.8, Noise, of this Final EIR, the estimated vibration velocity levels from all construction equipment would be well below the building damage significance threshold for the Writers and Artists Building. While the development proposed under Alternative 5 would be reduced compared to the Project, as previously discussed, peak construction activity would be similar to the Project. As such, Alternative 5 would similarly not result in a significant indirect impact to historical resources in the vicinity of the Project Site. Therefore, the potential for indirect impacts on adjacent historical resources would be less than significant under this alternative, and such impacts would be similar to the Project.

Overall, impacts to historical resources under Alternative 5 would be less than significant, and similar to the less-than-significant impacts of the Project.

5.5.2.3.2 Archaeological Resources

As previously discussed, Alternative 5 would eliminate one level of subterranean parking proposed by the Project. Therefore, Alternative 5 would require less excavation and would reduce the potential for uncovering unknown archaeological resources. Nevertheless, Alternative 5 would implement the same mitigation measure as the Project in order to mitigate potential impacts to archaeological resources. Overall, similar to the Project, potential impacts to archaeological resources would be less than significant with mitigation. However, such impacts would be less than the less-than-significant with mitigation impacts of the Project due to the reduction in excavation activities under Alternative 5.

5.5.2.4 Energy

5.5.2.4.1 Wasteful, Inefficient, or Unnecessary Consumption of Energy Resources

5.5.2.4.1.1 Construction

Similar to the Project, construction activities associated with Alternative 5 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. As with the Project, Alternative 5 would also generate a demand for transportation energy associated with on- and off-road vehicles. Like the Project, construction activities associated with Alternative 5 would not involve the consumption of natural gas. The energy consumed during construction of Alternative 5

would be less than that of the Project due to the reduction in construction activities. As with the Project, the electricity demand during construction of Alternative 5 would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Construction equipment used during construction of Alternative 5 would also comply with Title 24 requirements where applicable, similar to the Project. With regard to transportation fuels, trucks and equipment used during construction of Alternative 5 would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. Therefore, as with the Project, energy consumption during construction under Alternative 5 would not be wasteful, inefficient, or unnecessary. Overall, impacts regarding energy use associated with short-term construction activities would be less than significant under Alternative 5 and less than the less-than-significant impacts of the Project.

5.5.2.4.1.2 Operation

As with the Project, operation of Alternative 5 would generate an increased consumption of electricity, natural gas, and petroleum-based fuels relative to existing conditions. As described above, Alternative 5 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips under Alternative 5 would be reduced. Therefore, the consumption of electricity, natural gas, and petroleum-based fuels would be less than the Project. Like the Project, Alternative 5 would implement design features to reduce energy usage that would exceed Title 24 energy requirements. Accordingly, as with the Project, the consumption of electricity, natural gas, and petroleum-based fuels under Alternative 5 would not be wasteful, inefficient, or unnecessary. Overall, impacts related to energy use during operation of Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

5.5.2.4.2 Conflict with Plans for Renewable Energy or Energy Efficiency

As discussed in Section 4.4, Energy, of this Final EIR, the current City of Beverly Hills Green Building Code requires compliance with CalGreen and California's Building Energy Efficiency Standards (Title 24). Like the Project, Alternative 5 would comply with the City's Green Building Code, as well as be capable of achieving at least LEED® ~~Silver~~ Gold equivalent status, which include conservation features to reduce natural gas usage. Therefore, similar to the Project, Alternative 5 would incorporate measures that are beyond current State and City energy conservation requirements. Also similar to the Project, Alternative 5 would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2019 CALGreen Code and California's

Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code. Therefore, as with the Project, Alternative 5 would not conflict with plans for renewable energy or energy efficiency. Impacts related to renewable energy or energy efficiency plans under Alternative 5 would be less than significant and similar to the less-than-significant impacts of the Project.

5.5.2.5 Geology and Soils (Paleontological Resources)

As described above, Alternative 5 would eliminate one level of subterranean parking proposed by the Project. Therefore, the potential for uncovering paleontological artifacts that were not recovered during prior construction or other human activity would be reduced compared to the Project. Nevertheless, Alternative 5 would implement the same mitigation measures as the Project in order to mitigate potential impacts to paleontological resources to a less than significant level. Overall, similar to the Project, potential impacts to paleontological resources would be less than significant with mitigation. However, such impacts would be less than the less-than-significant with mitigation impacts of the Project due to the reduction in excavation activities under Alternative 5.

5.5.2.6 Greenhouse Gas Emissions

GHG emissions from a development project are determined in large part by the number of daily trips generated and energy consumption from proposed land uses. As previously discussed, Alternative 5 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips under Alternative 5 would be reduced. Thus, the amount of GHG emissions generated by Alternative 5 would be less than the amount generated by the Project. As with the Project, Alternative 5 would be designed to comply with the requirements of the CALGreen Code and the Beverly Hills Green Building Code. Alternative 5 would also incorporate design features to reduce GHG emissions and be capable of meeting the standards of LEED® ~~Silver~~ Gold or equivalent green building standards. With compliance with the CALGreen Code and the Beverly Hills Green Building Code, and with the implementation of comparable sustainability features as the Project, Alternative 5 also would not conflict with any applicable plan, policy, regulation, or recommendation to reduce GHG emissions. Thus, impacts related to GHG emissions under Alternative 5 would be less than significant and less than the less-than-significant impacts of the Project.

5.5.2.7 Land Use and Planning

As previously described, Alternative 5 would develop the Project Site with uses similar to the Project, but would eliminate the Project's private club, and also eliminate the proposed publicly accessible, ground floor restaurant on the corner of South Santa Monica Boulevard and North Beverly Drive, replacing it with the outer wall of the down ramp to the

subterranean parking. The remaining restaurant and the wellness center and spa on the sixth floor would be reduced in size and available to hotel guests only. Open spaces and landscaping under Alternative 5 would also be greatly reduced. The open space and landscaping proposed by Alternative 5 would consist of the pool decks on the sixth and seventh floors, which would be reduced in size.

Based on the building design constraints of Alternative 5, this alternative would not support certain goals and policies of the City regarding site planning, architectural design, community character, and landscaping. Specifically, this alternative is lacking the Project's modulation, articulation, and building step-backs and other design features and thus would not support the City's Goal LU-2 to provide a built environment that is distinguished by its high level of site planning, architecture, landscape design, and sensitivity to its natural setting and history to the same degree as the Project. Similarly, Alternative 5 would not support to the same extent as the Project, the City's Policies LU-2.4 and Policy LU-11.2, which require that new construction and renovation of existing buildings and properties exhibit a high level of excellence in site planning, architectural design, landscaping, and amenities and that commercial and office properties and buildings are planned and designed to exhibit a high level of site and architectural design quality and excellence, respectively. With elimination of the Project's various open space areas, Alternative 5 would not meet the City's Policies LU-16.4 and Policy OS-6.3 to provide plazas, open spaces, and other outdoor improvements that are accessible to and used for public gatherings and activities, and to require that new development be located and designed to visually complement the urban setting by providing accessible, landscaped entries, courtyards, and plazas.

In summary, while Alternative 5 would develop the Project Site with the same uses as the Project, this alternative would eliminate many of the Project's features and the various design elements of the building proposed by the Project which support the City's goals, objectives, and policies, as discussed above. As such, this alternative conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. Thus, impacts related to conflicts with land use plans under Alternative 5 would be potentially significant and greater than the less-than-significant impacts of the Project.

5.5.2.8 Noise

5.5.2.8.1 Construction

5.5.2.8.1.1 On- and Off-Site Noise During Construction

The types of construction activities under Alternative 5 would be similar to the Project, although the amount of construction activities would be reduced due to the

elimination of one subterranean parking level and overall reduction in floor area. As with the Project, construction of Alternative 5 would generate noise from the use of heavy-duty construction equipment as well as from haul truck and construction worker trips. While the overall duration and amount of construction may be reduced under Alternative 5, on- and off-site construction activities and the associated construction noise levels would be expected to be similar to the Project during maximum (peak) activity days. As such, noise levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 5 would comply with the same applicable regulatory requirements and implement similar design features as the Project to reduce noise levels during construction. Therefore, as with the Project, on-site and off-site construction noise impacts would be less than significant. Overall, construction-related noise impacts under Alternative 5 would be similar to those of the Project during peak conditions.

5.5.2.8.1.2 Vibration During Construction

As noted above, the types of construction activities under Alternative 5 would be similar to the Project, although construction activities would be reduced due to the reduction of floor area and elimination of one level of subterranean parking. As with the Project, construction of Alternative 5 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-site construction activities and the associated construction vibration levels would be expected to be similar to those of the Project during maximum (peak) activity days. As such, vibration levels during maximum activity days, which are used for measuring impact significance, would be similar to those of the Project. Alternative 5 would also implement similar design features and mitigation measure as the Project to reduce on-site vibration levels during construction. As such, vibration impacts due to on-site construction activities under Alternative 5 would similarly be less than significant with mitigation for on-site construction vibration (building damage) and less than significant for on-site construction vibration (human annoyance). Overall, vibration impacts under Alternative 5 would be similar to the impacts of the Project.

5.5.2.8.2 Operation

5.5.2.8.2.1 On- and Off-Site Noise During Operation

As discussed in Section 4.8, Noise, of this Final EIR, sources of operational noise under the Project include (a) on-site stationary noise sources, such as outdoor mechanical equipment, activities at or within the proposed parking facilities and loading dock; and (b) off-site mobile (roadway traffic) noise sources.

As previously discussed, Alternative 5 would eliminate the Project's proposed publicly accessible, ground floor restaurant on the corner of South Santa Monica Boulevard and North Beverly Drive and the private club, replacing it with the outer wall of the down ramp to the subterranean parking and the private club. The remaining restaurant and the wellness center and spa on the sixth floor would be reduced in size and available to hotel guests only. Open spaces and landscaping under Alternative 5 would also be greatly reduced. Specifically, Alternative 5 would eliminate the Project's proposed 4,760 square feet of outdoor restaurant and bar spaces on levels six and seven; the 742-square-foot outdoor terrace on the seventh level; and the wellness center outdoor area. The remaining open space and landscaping proposed by Alternative 5 would consist of the pool decks on the sixth and seventh floors, which would be reduced in size. Due to the elimination of these uses, the noise levels generated during Alternative 5 would be anticipated to be less than the noise levels of the Project. Thus, operational on-site noise impacts would be less than significant and less than the less-than-significant impacts of the Project.

With regard to off-site noise sources, as previously discussed, Alternative 5 would result in a reduction in the amount of total floor area compared to the Project. Accordingly, the number of daily trips under Alternative 5 would result in a reduction of net new daily trips. Therefore, as with the Project, off-site noise impacts under Alternative 5 would be less than significant and such impacts would be less than those of the Project.

5.5.2.9.2.2 Vibration During Operation

As discussed in Section 4.8, Noise, of this Final EIR, sources of vibration related to operation under the Project would include (a) vehicle circulation, (b) delivery trucks, and (c) building mechanical equipment. Vehicular-induced vibration, including vehicle circulation within the subterranean parking area, would not generate perceptible vibration levels at off-site sensitive uses. Building mechanical equipment installed as part of the Project would include typical commercial-grade stationary mechanical equipment, which would include vibration-attenuation mounts to reduce vibration transmission so vibration would not be perceptible at the off-site sensitive receptors.

Alternative 5 would introduce vibration from similar vibration sources as the Project. Due to the development of similar uses as the Project, the vibration levels generated during Alternative 5 would be anticipated to be similar to the vibration levels of the Project. Thus, operational vibration impacts would be less than significant and similar to the less-than-significant impacts of the Project.

5.5.2.9 Transportation

As discussed above, Alternative 5 would be developed within the same Project Site as the Project; therefore, the plans, policies, and programs applicable to the Project would also apply to Alternative 5.

With regard to construction, Alternative 5, the Reduced Project Alternative, would develop the Project Site similar to the Project but at a reduced scale, including by eliminating the third subterranean level proposed under the Project as well as all publicly-accessible uses except for the ground-floor retail on Rodeo Drive. Overall, Alternative 5 would provide 168,403 square feet as compared to the 220,950 square feet of floor area of the Project (a reduction of 52,546 square feet). While the types of construction activities under Alternative 5 would be similar to the Project, the amount of excavation activities and associated subterranean parking construction would be reduced due to the elimination of one subterranean parking level. As with the Project, construction of Alternative 5 would generate construction-related traffic from haul trucks and construction workers and would also require the delivery and staging of construction and materials and equipment. As such, similar to the Project, potential construction-related transportation impacts could also result during construction of Alternative 5. While the overall duration and amount of construction may be reduced under Alternative 5, construction activities and the associated construction traffic levels would be expected to be similar to the Project during maximum (peak) activity days. As such, transportation-related impacts during construction would be similar to those of the Project, although such impacts may be experienced over a shorter duration compared to the Project. Alternative 5 would also implement similar mitigation as the Project to reduce potential construction-related transportation impacts to a less-than-significant level. Therefore, as with the Project, construction-related transportation impacts would be less than significant with mitigation, similar to those of the Project.

Alternative 5 would include uses similar to the Project but would eliminate the Project's proposed publicly accessible, ground floor restaurant on the corner of South Santa Monica Boulevard and North Beverly Drive and the private club. The remaining restaurant and the wellness center and spa on the sixth floor would be reduced in size and available to hotel guests only. Open spaces and landscaping under Alternative 5 would also be greatly reduced. Overall, as with the Project, Alternative 5 would be consistent with the goals, policies, and requirements of the applicable plans. Specifically, Alternative 5 would be consistent with the City of Beverly Hills General Plan, the City's Draft Complete Streets Plan, the LA Metro First Last Mile Strategic Plan, and the SGAG RTP/SCS. Similar to the Project, Alternative 5 would reduce vehicle trips and VMT by encouraging the use of alternative modes of transportation by providing convenient and adequate bicycling facilities. As such, Alternative 5 would comply with the programs and policies set forth in the City of Beverly Hills General Plan, the City's Draft Complete Streets Plan, and the LA

Metro First Last Mile Strategic Plan, and the SGAG RTP/SCS. Thus, impacts would be similar to the less-than-significant impacts of the Project.

With respect to VMT, similar to the Project, Alternative 5 meets Screening Criteria 2 and Screening Criteria 4 adopted by the City of Beverly Hills. Based on the screening criteria, Alternative 5 would have a less than significant VMT impact and is screened out from further VMT analysis. Therefore, impacts with respect to conflicts with CEQA Guidelines Section 15064.3, subdivision (b) would be similar to the less-than-significant impacts of the Project.

As with the Project, Alternative 5 would not introduce hazardous design features such as sharp curves or hazardous uses. In addition, as with the Project, relocation of the alley to provide access from North Beverly Drive would not substantially increase hazards or result in an incompatible use. Thus, impacts related to increased hazards due to a design feature or incompatible uses would continue to be less than significant under Alternative 5 and such impacts would be similar to the less than significant impacts of the Project.

With regard to emergency access, during construction of Alternative 5, travel lanes would be maintained in both directions in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access, similar to the Project. During operation, Alternative 5 also would not involve the permanent closure of any local public streets and primary access to the Project Site would continue to be provided from the surrounding streets. In addition, like the Project, Alternative 5 would comply with Beverly Hills Fire Department access requirements and applicable Beverly Hills Fire Department regulations regarding safety. Therefore, Alternative 5 also would not result in inadequate emergency access to the Project Site or surrounding uses, and impacts regarding inadequate emergency access would be less than significant, and similar to the less than significant impacts of the Project.

5.5.2.10 Tribal Cultural Resources

As noted above, Alternative 5 would eliminate one level of subterranean parking proposed by the Project. Therefore, the potential for Alternative 5 to uncover subsurface tribal cultural resources would be reduced when compared to that of the Project. In addition, as discussed in Section 4.10, Tribal Cultural Resources, of this Final EIR, no known recorded tribal cultural resources have been identified within the Project Site or in the immediate vicinity of the Project Site. Nevertheless, Alternative 5 would implement the same mitigation measures as the Project in order to mitigate potential impacts to tribal cultural resources to a less than significant level. Overall, similar to the Project, potential impacts to tribal cultural resources would be less than significant with mitigation. However,

such impacts would be less than those of the Project due to the reduction in excavation activities under Alternative 5.

5.5.2.11 Utilities and Service Systems (Energy Infrastructure)

5.5.2.11.1 Construction

As discussed above, Alternative 5 would reduce the amount of energy needed for construction activities based on the reduction in construction activities. As discussed in Section 4.11, Utilities and Service Systems—Energy Infrastructure, of this Final EIR, the estimated energy usage of the Project during construction would be within the available capacity and supply of the existing infrastructure. Since Alternative 5 would generate a reduced demand for energy during construction compared to the Project, the energy demand of Alternative 5 would similarly be within the available capacity of the existing infrastructure. Therefore, impacts to energy infrastructure capacity would be less than significant and less when compared to the less-than-significant impacts of the Project.

5.5.2.11.2 Operation

As previously discussed, the total energy consumption of Alternative 5 would be less than that of the Project. Therefore, as with the Project, the existing energy infrastructure would similarly have capacity to support Alternative 5. Impacts related to energy infrastructure would be less than significant under Alternative 5 and less than the less-than-significant impacts of the Project.

5.5.3 Comparison of Impacts

As analyzed above, Alternative 5 would reduce construction and operational activities due to the reduction in uses, floor area, and parking. However, Alternative 5 would not eliminate any of the Project's impacts, which are less than significant or less than significant with mitigation. Impacts under Alternative 5 would be mostly similar to, or less than, those of the Project, except for impacts regarding land use and planning, which would be greater under Alternative 5 compared to the Project.

5.5.4. Relationship of the Alternative to Project Objectives

While Alternative 5 would provide a similar mix of uses as the Project, such uses would be reduced. As such, Alternative 5 would only partially meet the underlying purpose of the Project to revitalize the Project Site by developing a high quality hotel development project that provides new lodging opportunities within the City to serve the region and tourists. Specifically, the Reduced Project Alternative provides a smaller number of hotel rooms (85 rooms as opposed to the Project's up-to 115 rooms), a reduced number of

restaurants, reduces the size of the amenity uses (spa, wellness center with gym), eliminates one level of subterranean parking and the members club, and greatly reduces open space and landscaping. Only the retail use is open to the public. The ground floor restaurant would be eliminated, as are the majority of the sidewalk improvements. Building step backs, modulation and articulation are eliminated. Alternative 5 could provide a high quality hotel development, although it would not deliver the same quality of design and service as the Project. Alternative 5 does not provide a publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site. Alternative 5 would achieve the following Project objectives:

- Support and expand tourism and business activity by developing new lodging opportunities that are easily accessible to entertainment and commercial destinations in the City of Beverly Hills.

- Reduce vehicular trips and promote local and regional mobility objectives by developing a hotel use with convenient access to a variety of alternative transportation options including walking, biking, and public transit, and in close proximity to popular tourist destinations.

The following objectives are either not met or only partially met by Alternative 5 due to the elimination of step backs, modulation and articulation in building design, the ground-floor restaurant, the private club, public use of the wellness center and spa and remaining restaurant and their reduction in size, and elimination of one subterranean level of parking and the proposed streetscape improvements:

- Provide short- and long-term employment opportunities and maximize transient occupancy tax revenue for the City through the development of a one-of-a-kind luxury hotel that will attract visitors to the Business Triangle and Beverly Hills.

- Replace existing uses and structures with an economically viable and aesthetically attractive development on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.

- To accommodate vehicle flow on adjacent City streets and promote multiple transportation modes (walking, bicycling) by relocating the alley bisecting the Project Site, placing parking underground, limiting driveway access points, and enhancing the pedestrian environment on all of the adjoining streets.

- Improve the pedestrian experience and enhance walkability through a pedestrian friendly design that includes pedestrian amenities at ground level.

5.0 Alternatives

5.6 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/No Build 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 Final EIR, the range of feasible alternatives includes the No Project Alternative; the Reduced Excavation and Reduced Parking Alternative; the Zoning Compliant Alternative; the Reduced Height Alternative; and the Reduced Project Alternative. Table 5.0-2 on page 5.0-6 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.

While none of the potential impacts of the Project are significant and unavoidable, of the alternatives analyzed in this Final EIR, Alternative 1, the No Project Alternative would avoid all of the Project's environmental impacts. 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, as summarized above in Table 5.0-4 (Summary of Comparison of Impacts Associated with the Alternatives and Impacts of the Project) on page 5.0-13) indicates that Alternative 3, the Zoning Compliant Alternative, would be the Environmentally Superior Alternative.

As discussed above, while Alternative 3 would not eliminate the Project's impacts which are less than significant or less than significant with mitigation, Alternative 3 would reduce many of the Project's less-than-significant and less than significant with mitigation impacts to the greatest degree compared to the other alternatives due to the substantial reduction of excavation and floor area involved. Specifically, as previously discussed, Alternative 3 would provide 105,214 square feet of floor area with a FAR of 2.0:1, compared to the 220,950 square feet of floor area and 3.91:1 FAR as proposed by the

Project (a reduction of 115,735 square feet). Furthermore, Alternative 3 would include 36 guest rooms within three stories with a maximum height of 45 feet, as compared to the proposed building of the Project which would include 115 guest rooms and would vary in height from four stories and a maximum height of 51 feet along North Rodeo Drive to nine stories with a maximum height of 115 feet along North Beverly Drive. Additionally, Alternative 3 would include one subterranean parking level (a reduction of two subterranean levels when compared to the Project's three proposed subterranean levels), Consequently, soil export and associated haul truck trips for Alternative 3 would also be reduced as compared to the Project, and would include 18,435 cubic yards of exported soil (a reduction of 106,485 cubic yards when compared to the Project's proposed 124,920 cubic yards of exported soil) within 922 truckloads (a reduction of 5,324 truckloads when compared to the Project's proposed 6,246 truckloads).

Compared to the remaining alternatives as summarized above in Table 5.0-1 on page 5.0-4, Alternative 2 would only reduce the Project's subterranean parking by one level while not altering the Project's number of hotel guest rooms, floor area, and height. Alternative 4 would not reduce the Project's subterranean parking, number of hotel guest rooms, or floor area; it would reduce the Project's height to seven stories. However, Alternative 4 would not support, to the same extent as the Project, City General Plan policies that require new development to exhibit excellence in site and architectural design. Alternative 5, the Reduced Project Alternative, would reduce the Project's number of guest rooms, floor area, subterranean parking by one level, and reduce the Project's height to seven stories. Alternative 5 would reduce impacts driven by floor area and excavation, but its design constraints would result in conflicts with City General Plan policies regarding new developing exhibiting excellence in site and architectural design. Thus, for the reasons listed above, of the range of alternatives analyzed, Alternative 3 would be the Environmentally Superior Alternative.

While Alternative 3 is identified as the Environmentally Superior Alternative, it is noted that Alternative 3 would not meet the underlying purpose of the Project to revitalize the Project Site by developing a high quality hotel development project that provides new lodging opportunities within the City to serve the region and tourists as well as publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site. Specifically, the number of hotel rooms would be substantially reduced (36 rooms as compared to the Project's up-to 115 rooms) and all hotel amenities (restaurant, bar, pool, spa, wellness center with gym, members club) would be eliminated, as are the sidewalk improvements. Alternative 3 would therefore not provide a high quality hotel development within the City to serve the region and tourists as well as publicly accessible neighborhood-serving restaurant and bar uses that encourage pedestrian activity in the vicinity of the Project Site.

Alternative 3 would achieve the following Project objective, albeit to a lesser extent than the Project, due to its limited number of hotel rooms (2/3 fewer than those provided by the Project) and lack of amenities typically provided as part of a luxury hotel, including restaurants and bars, spa and pools.

- Reduce vehicular trips and promote local and regional mobility objectives by developing a hotel use with convenient access to a variety of alternative transportation options including walking, biking, and public transit, and in close proximity to popular tourist destinations.

The following objectives are either not met or only partially met by Alternative 3 due to the reduction in hotel rooms; retention of the alley in its current configuration; the reduction of two subterranean levels of parking; and the elimination of the restaurant uses, amenities, garden porte cochere over the motor court, sidewalk widening and pedestrian amenities, and the majority of the outdoor landscaping:

- Replace existing use and structures with an economically viable and aesthetically attractive development on a physically constrained site that will be physically and programmatically compatible with the variety of urban uses in the vicinity.

- Support and expand tourism and business activity by developing new lodging opportunities that are easily accessible to entertainment and commercial destinations in the City of Beverly Hills.

- Provide short- and long-term employment opportunities and maximize transient occupancy tax revenue for the City through the development of a one-of-a-kind luxury hotel that will attract visitors to the Business Triangle and Beverly Hills.

- Improve the pedestrian experience and enhance walkability through a pedestrian friendly design that includes pedestrian amenities at ground level.

- To accommodate vehicle flow on adjacent City streets and promote multiple transportation modes (walking, bicycling) by relocating the alley bisecting the Project Site, placing parking underground, limiting driveway access points, and enhancing the pedestrian environment on all of the adjoining streets.