
VI. ALTERNATIVES TO THE PROPOSED PROJECT

A. INTRODUCTION

The State CEQA Guidelines require that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the Project while still meeting the general Project objectives. The CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

Alternatives to the Proposed Project

Section 15126.6(a) of the CEQA Guidelines states: “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 comparable 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 decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the ‘rule of reason.’”

Purpose

Section 15126.6(b) of the CEQA Guidelines states: “Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.”

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the CEQA Guidelines states: “The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.” Factors that may be taken into account when addressing feasibility and infeasibility are site suitability, economic viability, availability of infrastructure, and technological feasibility.

Level of Detail

The CEQA Guidelines do not require the same level of detail in the alternatives analysis as in the analysis of the Proposed Project. Section 15126.6(d) of the CEQA Guidelines states: "The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

Project Objectives

The objectives for the Sunset-Silver Lake Project are:

- Develop new buildings appropriate to the scale, proportion, and aesthetic design of the Silver Lake community and capitalize on their strategic location at Sunset Junction.
- Locate housing and neighborhood serving commercial uses in close proximity to transit to reduce traffic congestion, vehicle miles traveled, and greenhouse gas emissions.
- Develop buildings with a range of residential unit types (studios, 1-bedroom, and 2-bedrooms) reflecting area need and market demand.
- Develop buildings with ground-floor retail and restaurant uses to enhance the pedestrian-orientation of the Silver Lake community as well as activate underutilized street frontages at all three Sites.
- Transform underutilized parcels, including the vacant and abandoned motel at Site 3, by developing safe and aesthetically pleasing mixed-use buildings.
- Increase the available deed restricted affordable housing stock in the Hollywood and Silver Lake-Echo Park-Elysian Valley Community Plan areas.

Overview of Selected Alternatives

The alternatives analyzed for the Proposed Project include:

- | | |
|-----------------------|--|
| Alternative 1: | No Project Alternative |
| Alternative 2: | Reduced Density/Reduced Height Alternative |
| Alternative 3: | All Commercial Alternative |

Alternative 4: Hotel and Reduced Residential Alternative

These alternatives were included for analysis based on mandatory requirements of CEQA and because of their potential to reduce the significant and unavoidable impacts of the Project related to shade/shadow (Site 2) (which are conservatively being disclosed and treated as significant and unavoidable, notwithstanding SB 743, which deems shade shadow impacts in mapped “Transit Priority Areas” less than significant as a matter of law), construction noise (Project-specific and cumulative), construction-related groundborne vibration (Project-specific and cumulative), and traffic (Project-specific and cumulative).

Details of Selected Alternatives**Alternative 1 – No Project Alternative**

Alternative 1 would consist of the No Project Alternative. Under this alternative, the Project Sites would remain developed with the existing uses. This alternative assumes continuation of existing conditions as well as the development of the related projects.

Alternative 2 – Reduced Density/Reduced Height Alternative

Alternative 2 would consist of the Reduced Density/Reduced Height Alternative. This alternative would generally comply with the existing zoning regulations, would be of reduced density and height when compared to the Project, and would not include any affordable housing and corresponding bonuses/incentives pursuant to SB 1818 and the City’s SB 1818 Implementing Ordinance. Like the Project, this alternative would involve the demolition of all existing buildings. Under this alternative, the Project Sites would be developed as follows:

- Site 1 would be developed with 3,070 square feet of retail, 3,570 square feet of restaurant, and 39 residential units, for a total of 43,918 square feet;
- Site 2 would be developed with 9,520 square feet of retail and 38 residential units, for a total of 40,335 square feet; and
- Site 3 would be developed with 9,520 square feet of retail, 3,050 square feet of restaurant, and 58 residential units, for a total of 54,309 square feet.

The total project size under this alternative would be approximately 138,562 square feet, which is an approximately 47 percent reduction when compared to the Project.

Alternative 3 – All Commercial Alternative

Alternative 3 would eliminate the residential component of the Project. Like the Project, this alternative would involve the demolition of all existing buildings. However, under Alternative 3, the Project would develop approximately 138,570 square feet of commercial uses, across the three Project Sites as follows:

- Site 1 would be developed with 3,870 square feet of retail, 13,980 square feet of restaurant, and 26,070 square feet of office uses;
- Site 2 would be developed with 17,700 square feet of restaurant, and 22,640 square feet of office uses; and
- Site 3 would be developed with 9,450 square feet of restaurant, and 44,860 square feet of office uses.

Alternative 4 – Hotel and Reduced Residential Alternative

Under Alternative 4, Sites 2 and 3 would be developed with the same buildings as proposed for the Project. However, under this Alternative, Site 1 would be developed with a hotel in place of the Project's retail, restaurant, and residential uses. The three Project Sites would therefore be developed as follows:

- Site 1 would be developed with 94 hotel guest rooms and 4,000 square feet of restaurant uses, for a total of 55,155 square feet;
- Site 2 would be developed with 91 residential units and 10,000 square feet of commercial space, for a total of 80,670 square feet; and
- Site 3 would be developed with 122 residential units, 4,500 square feet of fitness center uses, and 1,000 square feet of restaurant uses, for a total of 102,100 square feet.

Overall, the Project constructed under Alternative 4 would have a total of 237,925 square feet.

Alternative Rejected as Being Infeasible

As described above, Section 15126.6(c) of the CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process, and briefly explain the reasons underlying the lead agency's determination.

An alternative that was considered was constructing the Project on alternative sites. However, the Project Applicant does not own or control other similar sites of comparable size on a major street within the vicinity of the Project Sites. Therefore, constructing the Project on alternative sites was rejected as infeasible.

Assumptions and Methodology

The anticipated means for implementation of the alternatives can influence the assessment and/or probability of impacts for those alternatives. For example, a project may have the potential to generate impacts, but considerations in project design may also afford the opportunity to avoid or reduce such impacts. The alternatives analysis is presented as a comparative analysis to the Project, and assumes that all applicable mitigation measures proposed for the Project would apply to each alternative. Impacts

associated with the alternatives are compared to Project-related impacts and are classified as greater, less, or essentially similar to (or comparable to) the level of impacts associated with the Proposed Project.

B. ALTERNATIVES ANALYSIS

The following alternatives analysis compares the potential environmental impacts of four alternatives with those of the Proposed Project for each of the environmental topics analyzed in detail in Section IV (Environmental Impact Analysis) of the EIR.

Alternative 1: No Project Alternative

Alternative 1 is the circumstance under which the Project does not proceed. The CEQA Guidelines (Section 15126.6(e)) provide that the “no project” analysis shall discuss the existing conditions at the time the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the Project is not approved based on current plans and consistent with available infrastructure and community services.

Under Alternative 1, the Project Sites would remain developed as follows: 1) Site 1 would remain developed with a single-family residence, an auto/office building, a warehouse, and paved parking; 2) Site 2 would remain developed with one commercial building and a surface parking lot; and 3) a currently vacant and boarded-up motel as well as a single family home and two duplexes would remain at Site 3. Alternative 1 assumes the continuation of existing conditions on the Project Sites as well as the development of the related projects.

The potential environmental impacts associated with Alternative 1 are described below and are compared to the potential environmental impacts associated with the Project.

Aesthetics

Under Alternative 1, the existing buildings would remain onsite, and would continue in their existing state. There would be no potential to create a change or improvement in the visual character of the Project Sites, block view sheds, create shadows on adjacent land uses, or create new sources of glare and lighting. Therefore, these impacts would be less than the Proposed Project’s significant and unavoidable impact with respect to shade/shadow, and less than all of the Project’s other less than significant aesthetic impacts. However, the blighted condition at Site 3 would continue as long as the existing boarded and vacant motel remained in place.

Air Quality

No grading or construction would be required under Alternative 1 and no new vehicle trips would be generated. In addition, no air pollutant emissions (e.g., PM₁₀, CO, and NO_x) related to grading, construction, or vehicle trips would be generated under this alternative. Therefore, Alternative 1 would

result in no impacts with respect to air quality, which would be less than the Project's less than significant impacts.

Cultural Resources

While the existing structures would remain onsite under Alternative 1, there are no historic resources located on any of the Project Sites. As such, like the Project, Alternative 1 would result in no impact with respect to historic resources. No excavation or grading activities would occur under Alternative 1. Therefore, there would be no potential to encounter paleontological or archaeological resources or human remains at depths not previously excavated. As such, Alternative 1 would result in no impacts with respect to paleontological/archaeological resources, which would be less than the Project's less than significant impacts.

Geology and Soils

Under Alternative 1, no grading or excavation would take place; thus, no impacts associated with grading or excavation would occur. In addition, no people or structures would be exposed to geotechnical hazards under this alternative. Therefore, Alternative 1 would result in no impacts with respect to geology and soils, which would be less than the Project's less than significant impacts.

Greenhouse Gases

No construction or alteration to the Project Sites would occur under Alternative 1. This alternative would not be expected to result in increased GHG emissions, as it would not increase electricity and natural gas consumption, vehicle miles traveled (VMT), water use, and solid waste generation and subsequent disposal into landfills. Therefore, Alternative 1 would result in no impact with respect to GHG emissions, which would be less than the Project's less than significant impacts.

Hazards and Hazardous Materials

No new or different land uses or activities would occur on the Sites that would potentially involve the routine transport, use, disposal, or upset of hazardous materials. Therefore, Alternative 1 would result in no impact with respect to hazards and hazardous materials, which would be less than the Project's less than significant impacts.

Land Use and Planning

The existing buildings would continue to occupy the Project Sites under Alternative 1. Therefore, Alternative 1 would not conflict with the Sites' land use or zoning designations. However, the existing buildings do not meet design criteria or development policies contained in local plans. Regarding community division, this alternative would not involve any development that would have the potential to physically divide an established community. Overall, Alternative 1 would result in no impact with respect to land use, which would be less than the Project's less than significant impacts.

Noise

As no new development would occur on the Project Sites under Alternative 1, no noise or vibration would be generated from construction activities. Furthermore, no new structures or other sources of noise would be developed on the Project Sites under this alternative. Therefore, under Alternative 1, there would be no impacts associated with noise, and impacts would be less than the Project's significant and unavoidable construction noise and vibrations impacts, and less than the Project's less than significant operational impact.

Population and Housing

Under Alternative 1, no new land uses would be developed which could impact population and housing. This alternative would not result in a change that would increase or decrease population, housing units or employees. However, this alternative would not include the benefit of providing new much needed market rate and affordable housing to the community. Overall, impacts under Alternative 1 would be less than significant, and less than the Project's less than significant impacts.

Public Services

Fire Protection

Under Alternative 1, no new land uses would be developed which could potentially increase the demand for fire protection services. This alternative would not result in an increase in the demand for protection and emergency services provided by the Los Angeles Fire Department (LAFD). Therefore, this alternative would result in no impact with respect to fire protection, which would be less than the Project's less than significant impacts.

Police Protection

Under Alternative 1, no new land uses would be developed which could potentially increase the demand for police protection services. This alternative would not result in an increase in the demand for police protection services from the Los Angeles Police Department (LAPD). Therefore, no impacts on police protection services would occur under Alternative 1, and impacts would be less than the Project's less than significant impacts.

Schools

Under Alternative 1, no new land uses would be developed which could potentially increase the demand for schools. This alternative would not result in additional students or an increase in the demand for school services. Therefore, no impacts on schools would occur under Alternative 1, and impacts would be less than the Project's less than significant impacts.

Parks

Under Alternative 1, no new land uses would be developed which could potentially increase the demand for parks. This alternative would not result in any new permanent residents or an increase in the demand for parks. Therefore, no impacts on parks would occur under Alternative 1, and impacts would be less than the Project's less than significant impacts.

Libraries

Under Alternative 1, no new land uses would be developed which could potentially increase the demand for libraries. This alternative would not result in any new permanent residents or an increase in the demand for library services. Therefore, no impacts on library services would occur under Alternative 1, and impacts would be less than the Project's less than significant impacts.

Transportation and Traffic

Under Alternative 1, no additional traffic would be generated from the Project Sites. Development of the Project would generate 2,947 daily trips, including 237 AM peak hour trips and 251 PM peak hour trips. Under this alternative, these additional trips would not be generated, intersection impacts and freeway conditions would not change, and thus, no impacts would occur. Therefore, no impact on traffic or transportation would occur under Alternative 1, and impacts would be less than the Project's significant and unavoidable impact at the intersection of Hoover Street/Fountain Street/Sunset Boulevard, and less than significant impacts at the remaining intersections. However, this alternative would not provide the benefit of installing a traffic signal at Manzanita Street/Sunset Boulevard (subject to review by LADOT), which is provided as Mitigation Measure M-2 for the Project.

Utilities

Water

No additional demand for water supply would be generated on the Project Sites under Alternative 1. Under the Project, there would be an increase in demand of approximately 43,000 gpd of water (see Section IV.N-1, Water). Therefore, no impact on water supply services would occur, and impacts under Alternative 1 would be less than the Project's less than significant impacts.

Wastewater

No additional wastewater would be generated on the Project Sites under Alternative 1. Under the Project, there would be an increase in the generation of wastewater of approximately 35,955 gpd (see Section IV.N-2, Wastewater). Therefore, no impact on wastewater services would occur, and impacts under Alternative 1 would be less than the Project's less than significant impacts.

Solid Waste

No additional solid waste would be generated under Alternative 1. The Project would result in the generation of approximately 3,783 pounds of solid waste per day (see Section IV.N-3, Solid Waste) while in operation. Therefore, no impact on solid waste services would occur, and impacts under Alternative 1 would be less than the Project's less than significant impacts.

Energy

No additional demand for electricity and natural gas would be generated on the Project Sites under Alternative 1. Under the Project, there would be an increase in demand of approximately 2,377,885 kWh/year of electricity and 1,225,754 cf/month of natural gas (see Section IV.N-4, Energy). Therefore, no impact on electricity and natural gas supply would occur, and impacts under Alternative 1 would be less than the Project's less than significant impacts.

Relationship to Project Objectives

Alternative 1 maintains the existing conditions at the Project Sites. However, Alternative 1 would not satisfy any of the project objectives, which are detailed at the beginning of this section.

Reduction of Significant Project Impacts

Alternative 1 would not result in any significant environmental impacts, and would reduce the Project's significant and unavoidable impacts with respect to shade/shadow (Site 2) (which are conservatively being disclosed and treated as significant and unavoidable, notwithstanding SB 743, which deems shade shadow impacts in mapped "Transit Priority Areas" less than significant as a matter of law), construction noise and vibration (Project-specific and cumulative), and traffic (Project-specific and cumulative).

Alternative 2: Reduced Density/Reduced Height Alternative

Alternative 2 would consist of the Reduced Density/Reduced Height Alternative. This alternative would generally comply with the existing zoning regulations, would reduce the density and height when compared to the Project, and would not include any affordable housing and corresponding bonuses/incentives pursuant to SB 1818 and the City's SB 1818 Implementing Ordinance. Like the Project, this alternative would involve the demolition of all existing buildings. Under this alternative, the Project Sites would be developed as follows:

- Site 1 would be developed with 3,070 square feet of retail, 3,570 square feet of restaurant, and 39 residential units, for a total of 43,918 square feet;

- Site 2 would be developed with 9,520 square feet of retail and 38 residential units, for a total of 40,335 square feet¹; and
- Site 3 would be developed with 9,520 square feet of retail, 3,050 square feet of restaurant, and 58 residential units, for a total of 54,309 square feet.

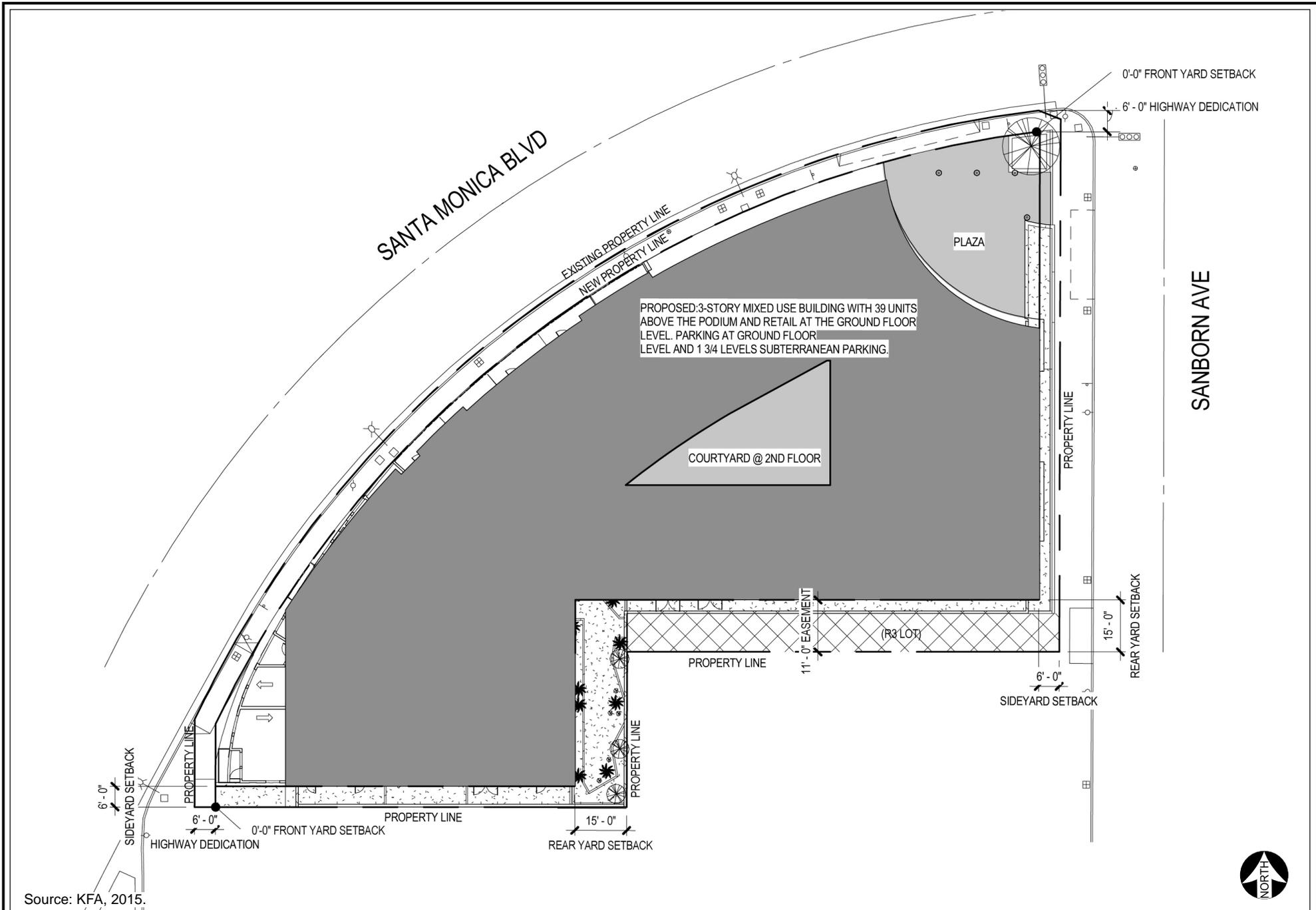
The total project size under this alternative would be approximately 138,562 square feet, which is an approximately 47 percent reduction when compared to the Project.

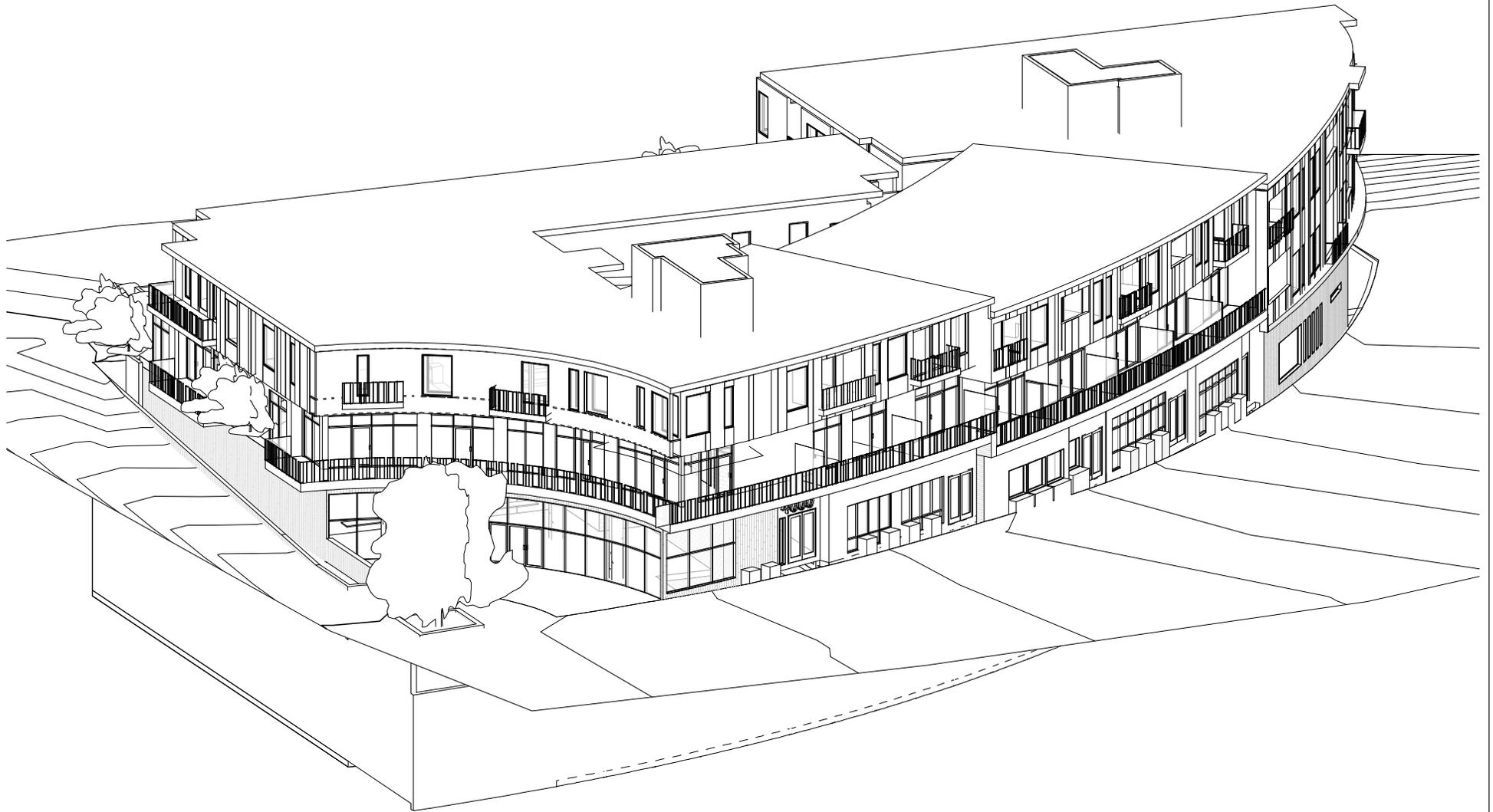
Aesthetics

Like the Project, the buildings under Alternative 2 would be new buildings that would be reduced in size by approximately 47 percent compared to the Project. In addition to the reduction in square footage, this alternative would also reduce the height of each building. Development under this alternative would result in less intense development of the Project Sites when compared to the Project, creating less apparent massing on the Project Sites. Overall, implementation of this alternative would result in less than significant impacts with respect to views and light/glare, and impacts would be less than the Project's less than significant impacts, due to the less intense development of the Project Sites.

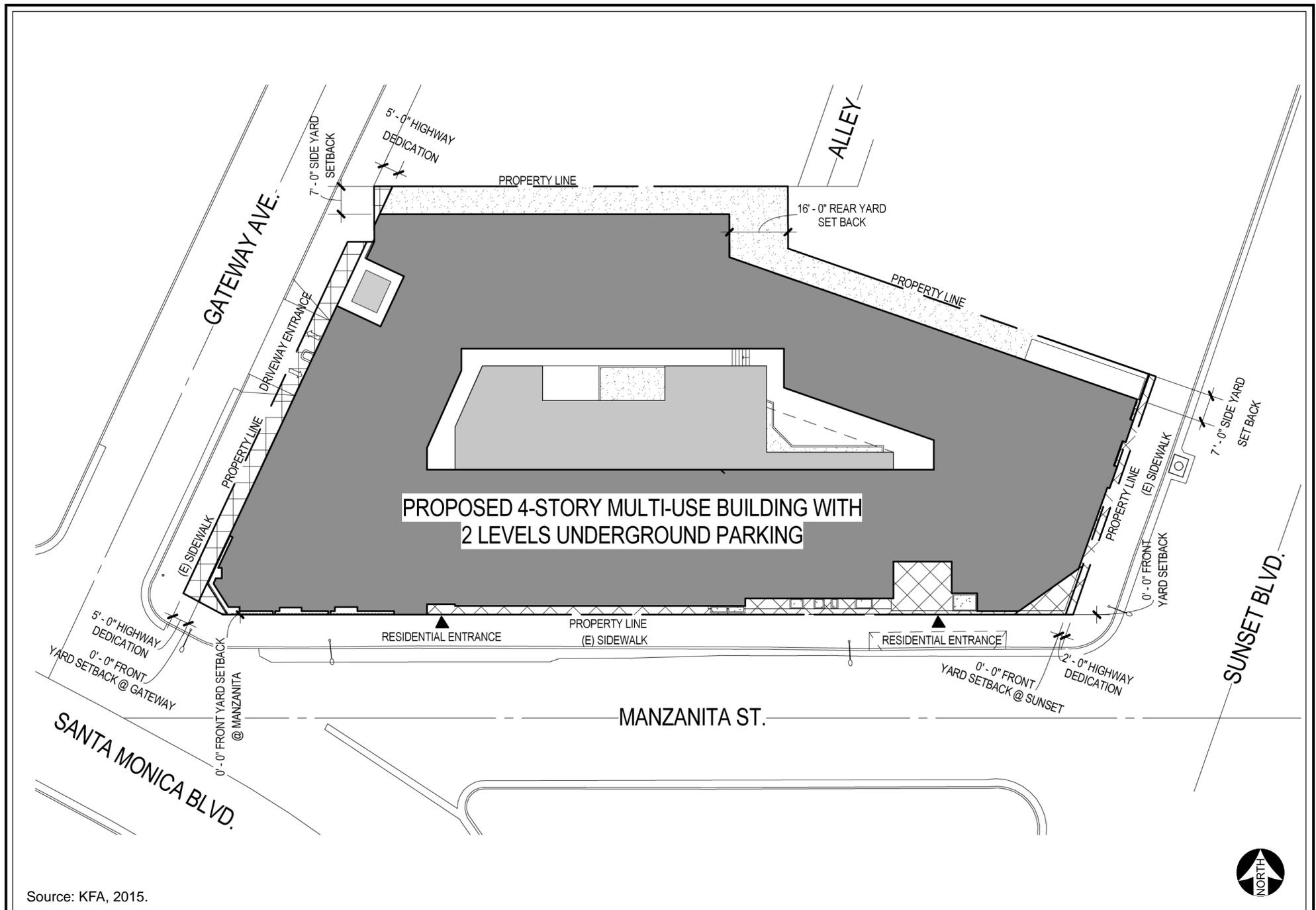
The Project would result in a significant and unavoidable shade/shadow impact on the single-family residences immediately adjacent to the northwest of Site 2 based on the City's shadow impact thresholds, as these residences would be shaded for more than three hours between the hours of 9:00 AM and 5:00 PM during the summer and fall, and for more than three hours between the hours of 9:00 AM and 3:00 PM during the spring and winter. However, based on SB 743 and ZI No. 2451, this impact would be considered less than significant as a matter of law. The height of the buildings would be reduced under this alternative (Sites 1 and 3 would be restricted to 45 feet in height and Site 2 (where there is no height limit), would be restricted by the FAR allowed in the C2-1 zone). Notwithstanding SB 743 the EIR conservatively concludes that the alternative's reduced building height on Site 2 would still cause a significant and unavoidable shade/shadow impact on the single-family residences immediately adjacent to the northwest of Site 2, similar to the Project's significant and unavoidable impact based on the City's shadow impact thresholds.

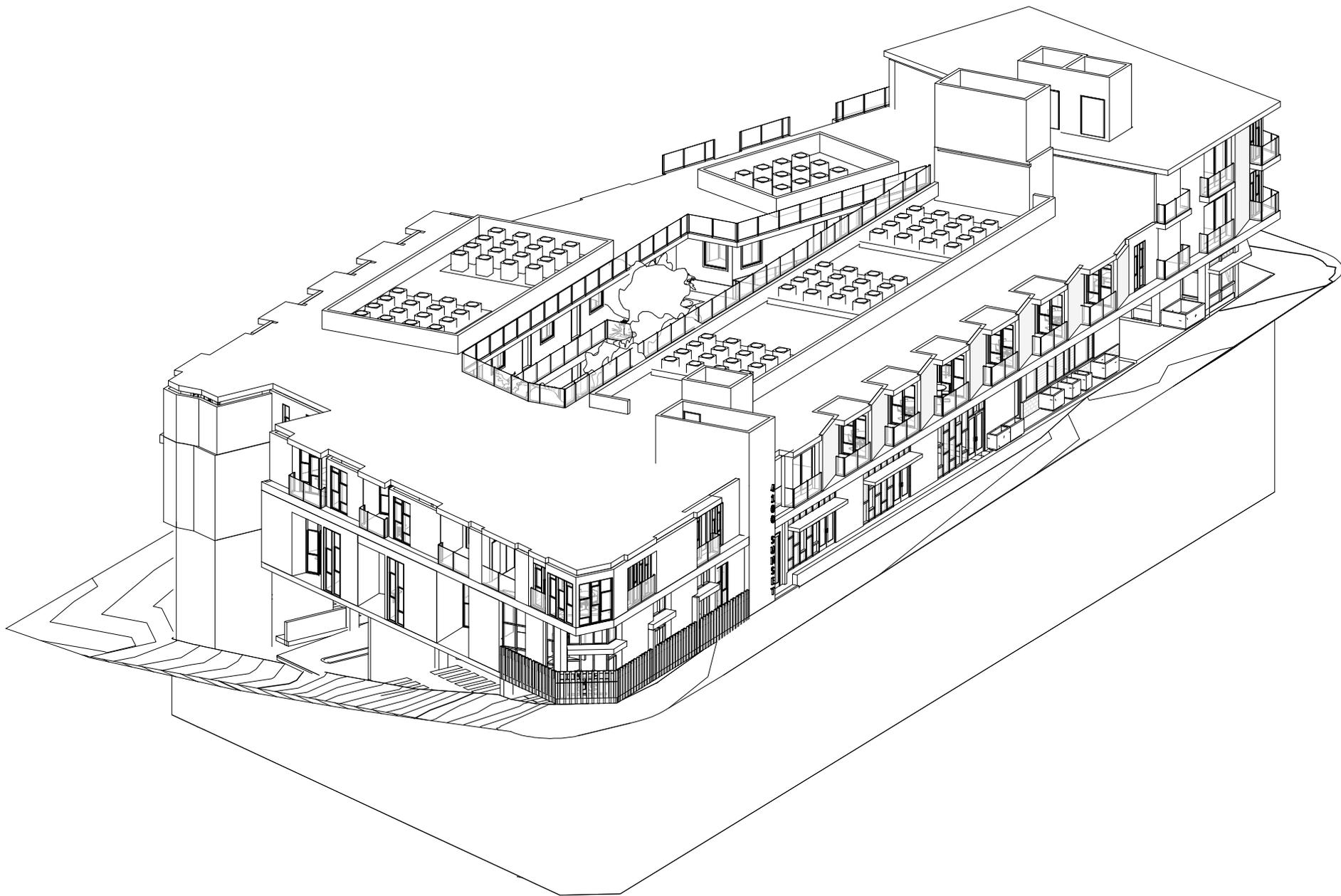
¹ Note that the Site 2 Reduced Density/Reduced Height alternative project assumed removal of the existing D limitation and a 1.5 to 1 allowable FAR that would otherwise be permitted in the C2-1 zone/height district.



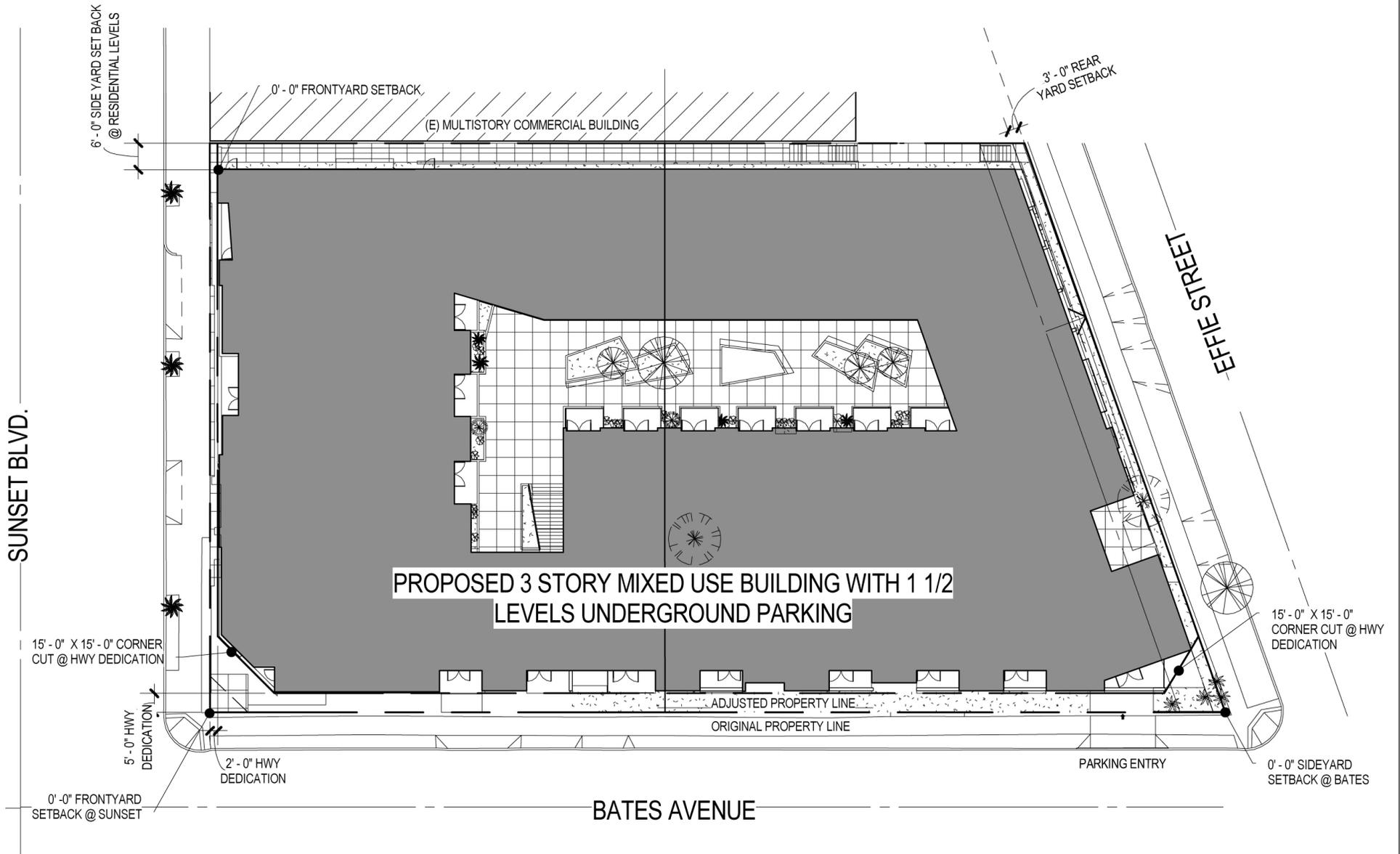


Source: KFA, 2015.





Source: KFA, 2015.



Source: KFA, 2015.





Source: KFA, 2015.



Source: Scott A. Johnson, 2015.





Source: Scott A. Johnson, 2015.





Source: Scott A. Johnson, 2015.





Source: Scott A. Johnson, 2015.



Air Quality

Construction

Regional and localized construction related impacts under the Project were found to be less than significant with implementation of Mitigation Measures C-1 through C-19. Under Alternative 2, the Project Sites would be developed with an approximate total of 138,562 square feet of retail, restaurant, and residential uses. This represents a 47 percent reduction in total floor area from the Project. While it is assumed that construction of this alternative would generally utilize the same construction equipment as the Project, the duration of the construction period would likely be shorter than the Project due to a smaller scale project. Further, VOC emissions associated with architectural coatings would be lower, as there would be less surface area to prime, paint, and seal. However, peak daily construction activities under this alternative would be similar to those associated with the Project. Thus, similar to the Project, it is expected that regional construction-related daily emissions under this alternative would not exceed SCAQMD significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. However, VOC emissions would likely still exceed thresholds and could contribute to regional ozone violations. Localized construction-related emissions would exceed NO_x, PM₁₀, and PM_{2.5} thresholds, while CO thresholds would not be exceeded. As with the Project, implementation of Mitigation Measures C-1 through C-19 would reduce all regional and local air quality impacts below SCAQMD thresholds of significance. Therefore, the daily air quality impacts associated with the construction of Alternative 2 would be less than significant, although slightly decreased compared to the Project due to the shorter construction duration.

Operational

Regional and localized operational impacts were found to be less than significant for the Project. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Sites after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, and the operation of landscape maintenance equipment; mobile emissions would be generated by the motor vehicles traveling to and from the Project Sites. The Project would generate 2,947 daily trips. Alternative 2 would result in a decrease in square footage compared to the Project, and thus would result in 1,485 fewer daily trips compared to the Project. As such, air quality impacts with respect to motor vehicles would be less than significant and reduced compared to the Project. Thus, impacts with respect to area source emissions under Alternative 2 would also be less than significant and reduced when compared to the Project.

Cultural Resources

Under Alternative 2, the existing structures would be demolished. However, there are no historic resources located on any of the Project Sites. As such, like the Project, Alternative 2 would result in no impact with respect to historic resources. While Alternative 2 would result in the construction of a smaller project when compared to the Project, the entirety of the three Project Sites would be graded for both the Project and this alternative. Therefore, this alternative would result in a similar potential to encounter archaeological or paleontological resources when compared to the Project. Alternative 2 would

implement the same mitigation measures as the Project, and therefore, impacts would be less than significant, and would be similar than the Project's less than significant impacts.

Geology and Soils

Alternative 2 would be located on the same Project Sites as the Project, which are located in the seismically active region of Southern California. The impacts with respect to seismic hazards, fault rupture, ground shaking, liquefaction, and landslides would be similar to the Project. The same mitigation measures that would be implemented with the Project would also be implemented under this alternative. Impacts under Alternative 2 associated with seismic hazards would be similar to the Project's less than significant impacts.

Grading activities would be similar to the Project. Minor erosion and siltation could occur during construction similar to the Project's less than significant impacts. Like the Project, all Site grading and Site preparation would comply with applicable provisions of the 2014 Building Code and the 2013 California Building Code. Impacts of this alternative for soil erosion would be similar to the Project's less than significant impacts. Overall, the geology and soils impacts under Alternative 2 would be similar to the Project's less than significant impacts.

Greenhouse Gases

Alternative 2 would include a decrease of approximately 47 percent of development when compared to the Project. Thus as discussed above, overall air quality emissions generated under this alternative would be less than significant and reduced compared to the Project. Consequently, GHG emissions under this alternative would also be reduced compared to the Project. Similar to the Project, this alternative would be consistent with plans at the State, regional, and local level that call for reductions in GHG emissions. As with the Project, emissions from Alternative 2 would be mitigated by the institution of Statewide measures from the AB 32 Scoping Plan, including the Pavley regulations that reduce 19.8 percent of GHG emissions from new vehicles. Like the Project, when compared to a No Action Taken scenario, implementation of Alternative 2 would reduce GHG emissions above the 15.8 percent threshold in the 2014 revisions to the AB 32 Scoping Plan. This alternative would include similar energy efficient design features as the Project, and these features would be generally consistent with the applicable state and local plans at reducing GHG emissions. Ultimately, Alternative 2 would be consistent with policies at the State (e.g., AB 32 Scoping Plan), regional (e.g., SCAG RTP/SCS, SCAQMD draft Efficiency Target), and local (e.g., City Green Building Ordinance) levels. As a result, impacts with respect to GHG emissions under Alternative 2 would be less than significant and reduced when compared to the Project.

Hazards and Hazardous Materials

Under Alternative 2, the existing structures would be demolished. As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, the mitigation measures that would be implemented for the Project would address potential impacts associated with the release of hazardous materials during construction activities. In addition, this alternative would include the same uses as the Project (residential,

retail, and restaurant). Because development under this alternative would occur on the same Project Sites and the same mitigation measures would be implemented, the impacts associated with hazards and hazardous materials under this alternative would be less than significant, and would be similar to the Project's less than significant impacts.

Land Use and Planning

This alternative would require fewer discretionary actions than the Project as this alternative eliminates the affordable housing component of the Project and, therefore, would not be entitled to a density bonus and/or incentives for height, FAR and setback reductions.² Similar to the Project, this alternative would not physically divide an established community. Overall, this alternative would result in a less than significant impact with respect to land use and planning. While this alternative would require fewer discretionary actions, it does so at the expense of including affordable housing. Therefore, impacts would be similar to the Project's less than significant impacts.

Noise

Construction

Construction-related noise impacts were found to be significant and unavoidable for the Project. Demolition activities under Alternative 2 would be the same as the Project's demolition activities. However, this alternative would result in a shorter duration of construction activity as 47 percent less floor area is proposed. However, peak construction noise levels would remain similar to the Project, as construction of this alternative would still require the use of heavy equipment for demolition, excavation for subterranean parking, Site grading, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity. However, because the City of Los Angeles defines significant construction noise impacts on a peak day or over a three-month period, the impacts would be comparable to the Project. Table VI-1 shows construction noise levels resulting from the construction of Alternative 2. As shown, Alternative 2 would still result in an ambient noise level exceeding 75 dBA at nearby sensitive receptors, with ambient noise level increases of 5 dBA or more for more than 10 days in a 3-month period, as well as increases of 10 dBA or more per day at some of the sensitive receptors. The greatest impact would occur at the Silverlake Independent Jewish Community Center.

² Note that a zone/height district change would be required for the alternative project at Site 2 to remove the existing D limitation and to allow 1.5 to 1 FAR, as generally permitted in the C2-1 zone/height district.

**Table VI-1
Alternative 2 - Unmitigated Construction Noise Levels**

Sensitive Receptor	Distance from Site (feet)¹	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Silverlake Independent Jewish Community Center	30	83.1	55.6	83.1	27.5
Residences South of Sunset Boulevard on Bates Avenue	210	70.8	56.6	70.9	14.3
Residences South of Sunset Boulevard/Santa Monica Boulevard on Manzanita Street	20	83.5	65.5	83.5	18.0
Residences North of Sunset Boulevard on Sanborn Avenue	110	76.1	63.2	76.3	13.1
Residences South of Sunset Boulevard on Sanborn Avenue	20	83.2	62.8	83.2	20.4
Thomas Star King Middle School	250	69.1	69.2	72.2	3.0
Residences on Sunset Boulevard near Manzanita Street Intersection	100	77.3	69.4	77.9	8.5
Laguna Senior Apartments	235	71.3	70.4	73.9	3.5
Residences on Gateway Avenue between Myra Avenue and Santa Monica Boulevard	5	83.2	59.6	83.2	23.6
Mack Sennett Studios	60	81.4	71.8	81.9	10.1

*1. Distance noted is the distance of the receptor to the nearest of the 3 construction sites.
SOURCE: DKA Planning, 2015.*

Alternative 2 would implement the same mitigation measures as the Project. Table VI-2 shows mitigated construction noise levels resulting from construction of Alternative 2. Although the ambient noise level would be reduced below 75 dBA at each of the 10 sensitive receptors in the vicinity of the three Project Sites, there would still be ambient noise increases over 5 dBA for more than 10 days in a three-month period, as well as an increase of 10 dBA or more at two of the sensitive receptors. Therefore, Alternative 2's construction noise impacts would be significant and unavoidable and similar to the Project.

**Table VI-2
Alternative 2 - Mitigated Construction Noise Levels**

Sensitive Receptor	Distance from Site (feet)¹	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Silverlake Independent Jewish Community Center	30	70.1	55.6	70.2	14.6
Residences South of Sunset Boulevard on Bates Avenue	210	57.8	56.6	60.2	3.6
Residences South of Sunset Boulevard/Santa Monica Boulevard on Manzanita Street	20	70.5	65.5	71.7	6.2
Residences North of Sunset Boulevard on Sanborn Avenue	110	63.1	63.2	66.1	2.9
Residences South of Sunset Boulevard on Sanborn Avenue	20	70.2	62.8	70.9	8.1
Thomas Star King Middle School	250	56.1	69.2	69.4	0.2
Residences on Sunset Boulevard near Manzanita Street Intersection	100	64.3	69.4	70.6	1.2
Laguna Senior Apartments	235	58.3	70.4	70.7	0.3
Residences on Gateway Avenue between Myra Avenue and Santa Monica Boulevard	5	70.2	59.6	70.6	11.0
Mack Sennett Studios	60	68.4	71.8	73.4	1.6

*1. Distance noted is the distance of the receptor to the nearest of the 3 construction sites.
SOURCE: DKA Planning, 2015.*

Construction-related vibration impacts were found to be significant and unavoidable for the Project. As discussed above, the maximum daily construction activities under this alternative would be substantially similar to the Project. Under this alternative, the nearest sensitive receptors to the Project Sites would be approximately 15 feet from occasional heavy equipment activity and could experience vibration levels up to 0.452 inches per second at Site 2. Vibration levels at these receptors would exceed the potential building damage threshold of 0.2 inches per second. Vibration annoyance levels would be approximately 101 VdB at Site 2. Alternative 2 would implement the same mitigation measures as the Project. However, implementation of these mitigation measures would not reduce impacts to a less than significant level. Therefore, construction vibration impacts would be significant and unavoidable, and similar to the Project.

Operation

Operational noise impacts were found to be less than significant for the Project. With respect to traffic and vehicular noise, the Reduced Density/Reduced Height Alternative would result in 1,485 fewer daily trips than the Project as this alternative provides the same uses as the Project, but in a project that is approximately 47 percent smaller than the Project. Thus, impacts with respect to roadway noise levels would be less than significant and reduced compared to the Project. Similar to the Project, this alternative

would also include subterranean parking that would generate noise from sources such as engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. These noise levels would be substantially similar to those experienced under the Project. As such, operational noise levels with respect to motor vehicles and parking under Alternative 2 would be less than significant and slightly reduced compared to the Project.

With respect to non-vehicular on-site noise sources (such as HVAC), Alternative 2 would be substantially similar to the Project. This alternative would be subject to the same mitigation measures as the Project, which would ensure that noise from HVAC systems do not significantly impact nearby sensitive receptors and also that the residential units include double-paned windows and vegetation sound walls for ground floor units. As such, on-site operational noise impacts would be less than significant under this alternative and essentially equivalent to the Project.

Population and Housing

Under Alternative 2, the Project would be reduced, resulting in smaller retail and restaurant spaces and fewer residential units. As such, Alternative 2 would result in reduced population and employment generation when compared to the Project. The removal of three occupied housing units would not substantially displace a number of existing housing or people. Therefore, impacts would be similar to the Project's less than significant impact.

Public Services

Fire Protection

Under Alternative 2, development on the Project Sites would be reduced when compared to the Project. As discussed in Section IV.L.1 of this Draft EIR, the Project would not result in the need for a new or physically altered governmental facility, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, and other performance objectives of the LAFD. The total onsite population under Alternative 2 would be less than the total onsite population for the Project and, therefore, the LAFD could accommodate this alternative without construction of a new facility. Therefore, this alternative would result in fewer impacts than the Project. Impacts for both the Project and Alternative 2 would be less than significant.

Police Protection

Under Alternative 2, the Project Sites would be developed with a smaller Project, with fewer on-site residents, employees, and visitors, when compared to the Project. As discussed in Section IV.L.2 of this Draft EIR, implementation of Project Design Features L.2-4 through L.2-8 would ensure that the Project's direct population increase would not significantly impact police services. The total onsite population under Alternative 2 would be less than the total onsite population for the Project and, therefore, the LAPD could accommodate this alternative without significant impacts to police services requiring the

construction of a new facility. Impacts with respect to police protection services would be less than significant, and less than the Project's less than significant impacts.

Schools

Under Alternative 2, the Project Sites would be developed with a smaller Project, with fewer residents when compared to the Project. Alternative 2 would be expected to generate fewer students than the Project. However, as discussed on Section IV.L.3 of this Draft EIR, some of the LAUSD schools serving the Project Sites (specifically Lexington and Lockwood Elementary Schools) would not have capacity to accommodate the students generated by the Project. While Alternative 2 would generate fewer students than the Project, the surrounding schools may not have capacity to serve the students generated by Alternative 2. Like the Project, Alternative 2 would be required to pay school facilities fees pursuant to SB 50. As such, Alternative 2 would result in a less than significant impact with respect to schools, which would be less than the Project's less than significant impact.

Parks

Under Alternative 2, the Project Sites would be developed with a smaller Project, with fewer residents, when compared to the Project. As Alternative 2 would generate a smaller population than the Project, Alternative 2 would require fewer acres of neighborhood and community parks. Like the Project, the demand for new parks and recreational facilities would not constitute a potentially significant impact because Alternative 2 would include features that would otherwise reduce or offset additional demand for recreation and park services. In addition, Alternative 2 would comply with the dwelling unit construction tax imposed by LAMC Section 21.10.3. As such, Alternative 2 would result in a less than significant impact with respect to parks and recreational facilities, and impacts would be less than the Project's less than significant impacts.

Libraries

Under Alternative 2, the Project Sites would be developed with a smaller Project, with fewer residents, when compared to the Project. As described in Section IV.L.5 of this Draft EIR, the Cahuenga Branch of the LAPL would be able to accommodate the population increase generated by the Project. The total onsite population under Alternative 2 would be less than the total onsite population for the Project and, therefore, the Cahuenga Branch of the LAPL could accommodate this alternative without construction of a new facility. Overall, Alternative 2 would result in a less than significant impact with respect to libraries, and impacts would be less than the Project's less than significant impacts.

Transportation and Traffic

Under Alternative 2, the Project Sites would be developed with approximately 138,562 square feet of residential, retail, and restaurant uses (an approximately 47 percent reduction when compared to the Project). As shown in Table VI-3, Alternative 2 would generate 1,461 total daily trips, including 145 AM peak hour trips and 120 PM peak hour trips, which is a reduction of 1,485 daily trips, 92 AM peak hour

trips, and 131 PM peak hour trips when compared to the Project. However, as shown in Table VI-4, Alternative 2 would result in the same significant and unavoidable impact at the Hoover Street/Fountain Avenue/Sunset Boulevard intersection during both the Existing with Project scenario and the Future (2018) with Project scenario (see Tables VI-4 and VI-5).

Table VI-3
Alternative 2 – Trip Generation

Weekday Trip Generation – Site 1											
Land Use	Size	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate¹	Total	Rate¹	Total	In	Out	Rate¹	Total	In	Out
Specialty Retail Center	3.07 ksf	44.32	136	6.84	21	10	11	2.71	9	4	5
Transit Credit		-15%	-20	-15%	-4	-2	-2	-15%	-2	-1	-1
Pass-by Trips		-10%	-12	-10%	-2	-1	-1	-10%	0	0	0
Net Trips			104		15	7	8		7	3	4
High-Turnover Restaurant	3.57 ksf	127.15	454	10.81	39	20	19	9.85	35	21	14
Transit Credit		-15%	-68	-15%	-6	-3	-3	-15%	-5	-3	-2
Pass-by Trips		-20%	-77	-20%	-6	-3	-3	-20%	-6	-4	-2
Net Trips			309		27	14	13		24	14	10
Residential Apartment	39 du	6.65	259	0.51	20	4	16	0.62	24	16	8
Transit Credit		-15%	-39	-15%	-3	-1	-2	-15%	-3	-2	-1
Net Trips			220		17	3	14		21	14	7
Total Net Trips			633		59	24	35		52	31	21
Internal Trips			-86		-8	-4	-4		-8	-4	-4
Total External Trips			547		51	20	31		44	27	17
Weekday Trip Generation – Site 2											
Land Use	Size (ksf/du)	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate¹	Total	Rate¹	Total	In	Out	Rate¹	Total	In	Out
Specialty Retail Center	9.52 ksf	44.32	422	6.84	65	31	34	2.71	26	11	15
Transit Credit		-15%	-63	-15%	-10	-5	-5	-15%	-4	-2	-2
Pass-by Trips		-10%	-36	-10%	-6	-3	-3	-10%	-2	-1	-1
Net Trips			323		49	23	26		20	8	12
Residential Apartment	38 du	6.65	253	0.51	20	4	16	0.62	24	15	9
Transit Credit		-15%	-38	-15%	-3	-1	-2	-15%	-3	-2	-1
Net Trips			215		17	3	14		21	13	8
Total Net Trips			538		66	26	66		41	21	20
Internal Trips			-157		-20	-10	-10		-12	-6	-6
Total External Trips			381		46	16	30		29	15	14
Weekday Trip Generation – Site 3											
Land Use	Size	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate¹	Total	Rate¹	Total	In	Out	Rate¹	Total	In	Out
Specialty Retail Center	9.52 ksf	44.32	101	6.84	16	8	8	2.71	6	3	3
Transit Credit		-15%	-15	-15%	-2	-1	-1	-15%	-1	0	-1
Pass-by Trips		-10%	-9	-10%	-2	-1	-1	-10%	0	0	0

Net Trips			77		12	6	6		5	3	2
High-Turnover Restaurant	3.05 ksf	127.15	388	10.81	33	33	16	9.85	30	18	12
Transit Credit		-15%	-58	-15%	-5	-5	-2	-15%	-5	-3	-2
Pass-by Trips		-20%	-66	-20%	-6	-6	-3	-20%	-5	-3	-2
Net Trips			264		22	22	11		20	12	8
Residential Apartment	58 du	6.65	811	0.51	30	30	24	0.62	36	23	13
Transit Credit		-15%	-158	-15%	-5	-5	-4	-15%	-6	-4	-2
Net Trips			328		25	25	20		30	19	11
Total Net Trips			669		59	59	37		55	34	21
Internal Trips			-136		-12	-12	-6		-6	-3	-3
Total External Trips			533		47	47	31		49	31	18

Note: ksf = thousand square feet du = dwelling unit

¹Trip rates are based on 1,000 square feet for retail and per dwelling units for residential.

**Table VI-4
Intersection LOS – Existing Plus Alternative 2**

No.	Intersection	Peak Hour	Existing		Existing Plus Alt 2		Change in V/C	Impact?
			V/C	LOS	V/C	LOS		
1	Vermont / Sunset	AM	0.696	B	0.699	B	0.003	No
		PM	0.870	D	0.872	D	0.002	No
2	Vermont / Fountain	AM	0.611	B	0.617	B	0.006	No
		PM	0.633	B	0.636	B	0.003	No
3	Hoover / Fountain / Sunset	AM	0.910	E	0.920	E	0.010	Yes
		PM	0.856	D	0.862	D	0.006	No
4	Hyperion / Fountain	AM	0.669	B	0.675	B	0.006	No
		PM	0.696	B	0.705	C	0.009	No
5	Bates / Sunset	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					
6	Manzanita / Sunset	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					
7	Sanborn / Santa Monica / Sunset	AM	0.569	A	0.595	A	0.026	No
		PM	0.521	A	0.532	A	0.011	No
8	Hyperion / Sunset	AM	0.599	A	0.606	B	0.007	No
		PM	0.637	B	0.642	B	0.005	No
9	Lucile / Sunset	AM	0.730	C	0.736	C	0.006	No
		PM	0.675	B	0.679	B	0.004	No
10	Hoover / Santa Monica	AM	0.658	B	0.670	B	0.012	No
		PM	0.677	B	0.686	B	0.009	No
11	Manzanita / Gateway / Santa Monica	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					

v/c = volume/capacity
Source: AECOM, April 2015.

**Table VI-5
Intersection LOS – 2018 With Alternative 2**

No.	Intersection	Peak Hour	Without Alt 2		With Alt 2		Change in V/C	Impact?
			V/C	LOS	V/C	LOS		
1	Vermont / Sunset	AM	0.721	C	0.725	C	0.004	No
		PM	0.902	E	0.905	E	0.003	No
2	Vermont / Fountain	AM	0.618	B	0.624	B	0.006	No
		PM	0.648	B	0.651	B	0.003	No
3	Hoover / Fountain / Sunset	AM	0.932	E	0.942	E	0.010	Yes
		PM	0.880	D	0.886	D	0.006	No
4	Hyperion / Fountain	AM	0.674	B	0.680	B	0.006	No
		PM	0.704	C	0.713	C	0.009	No
5	Bates / Sunset	AM	Intersection Not Evaluated					
		PM						
6	Manzanita / Sunset	AM	Intersection Not Evaluated					
		PM						
7	Sanborn / Santa Monica / Sunset	AM	0.588	A	0.614	B	0.026	No
		PM	0.532	A	0.547	A	0.015	No
8	Hyperion / Sunset	AM	0.613	B	0.619	B	0.006	No
		PM	0.651	B	0.656	B	0.005	No
9	Lucile / Sunset	AM	0.749	C	0.755	C	0.006	No
		PM	0.692	B	0.696	B	0.004	No
10	Hoover / Santa Monica	AM	0.680	B	0.692	B	0.012	No
		PM	0.706	C	0.716	C	0.010	No
11	Manzanita / Gateway / Santa Monica	AM	Intersection Not Evaluated					
		PM						

*v/c = volume/capacity.
Source: AECOM, April 2015.*

Utilities

Water

Under Alternative 2, the Project Sites would be developed with a smaller Project when compared to the Project. The Proposed Project would result in the demand for approximately 43,000 gpd of water (see Section IV.N.1, Water). As Alternative 2 would result in a smaller Project, the water demand of Alternative 2 would also be reduced when compared to the Project, based on the reduced square footage and same mix of uses. Overall, Alternative 2 would result in a less than significant impact with respect to water supply, and impacts would be less than the Project's less than significant impacts.

Wastewater

Under Alternative 2, the Project Sites would be developed with a smaller Project when compared to the Project. The Project would result in the generation of approximately 35,995 gpd of wastewater (see Section IV.N.2, Wastewater). As Alternative 2 would result in a smaller Project, the wastewater generation of Alternative 2 would also be reduced when compared to the Project, based on the reduced square footage and same mix of uses. Overall, Alternative 2 would result in a less than significant impact with respect to wastewater, and impacts would be less than the Project's less than significant impacts.

Solid Waste

Under Alternative 2, the Project Sites would be developed with a smaller Project when compared to the Project. The Project would result in the generation of approximately 3,783 pounds of solid waste per day during Project operation (see Section IV.N.3, Solid Waste). As Alternative 2 would result in a smaller Project, the solid waste generation of Alternative 2 would also be reduced when compared to the Project, based on the reduced square footage and same mix of uses. Overall, Alternative 2 would result in a less than significant impact with respect to solid waste, and impacts would be less than the Project's less than significant impacts.

Energy

Under Alternative 2, the Project Sites would be developed with a smaller Project when compared to the Project. The Project would result in the demand for 2,377,885 kWh/year of electricity and 1,225,754 cf/month of natural gas (see Section IV.N.4, Energy). As Alternative 2 would result in a smaller Project, the demand for electricity and natural gas would also be reduced when compared to the Project, based on the reduced square footage and same mix of uses. Overall, Alternative 2 would result in a less than significant impact with respect to energy, and impacts would be less than the Project's less than significant impacts.

Relationship to Project Objectives

Alternative 2 would not meet all of the Project objectives. Most notably, Alternative 2 would not provide any deed restricted affordable housing units to the Silver Lake and Hollywood Community Plan areas, which is one of the main Project objectives and a critical Citywide land use goal. Alternative 2 would also fail to meet the Project objective to provide much needed market rate housing in the Silver Lake community to the same degree as the Project. In addition, as the commercial component is reduced when compared to the Project, this alternative would provide fewer ground floor retail and restaurant options along Sunset Boulevard, and therefore fail to activate and enliven the streetscape as vibrantly as the Project.

Reduction of Significant Project Impacts

The Project would result in significant and unavoidable impacts with respect to shade/shadow (Site 2) (which are conservatively being disclosed and treated as significant and unavoidable, notwithstanding SB 743, which deems shade shadow impacts in mapped “Transit Priority Areas” less than significant as a matter of law), Project and cumulative construction noise and vibration, and traffic at the Hoover Street/Fountain Avenue/Sunset Boulevard intersection. Alternative 2 would result in similar shade/shadow, construction noise/vibration (Project-specific and cumulative), and traffic (Project-specific and cumulative) significant and unavoidable impacts as the Project.

Alternative 3: All Commercial Alternative

Alternative 3 would entirely eliminate the residential component of the Project. Like the Project, this alternative would involve the demolition of all existing buildings. However, under Alternative 3, the Project would develop approximately 138,570 square feet of commercial uses, across the three Project Sites as follows:

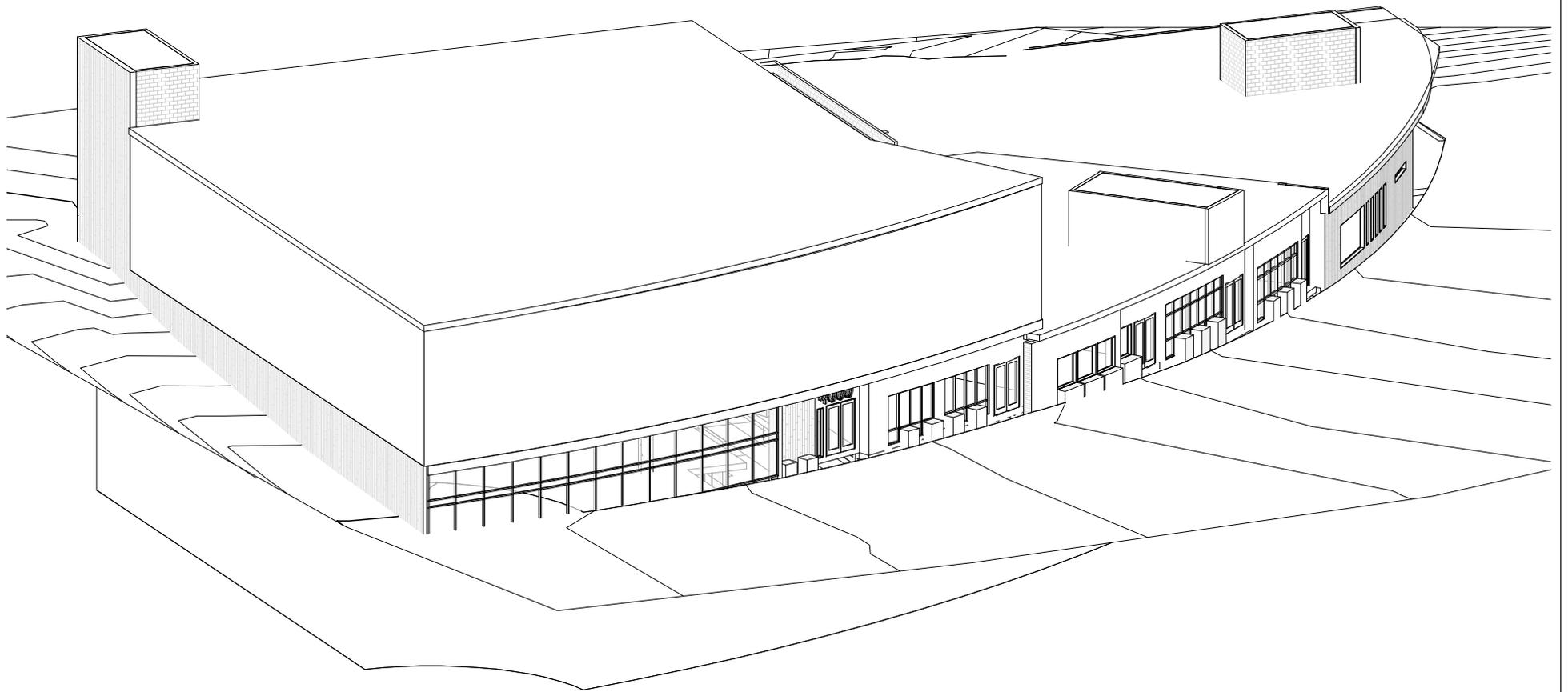
- Site 1 would be developed with 3,870 square feet of retail, 13,980 square feet of restaurant, and 26,070 square feet of office uses for a total of 43,920 square feet of commercial uses;
- Site 2 would be developed with 17,700 square feet of restaurant and 22,640 square feet of office uses for 40,340 square feet of total commercial uses; and
- Site 3 would be developed with 9,450 square feet of restaurant and 44,860 square feet of office uses for a total of 54,310 square feet of total commercial uses.

Aesthetics

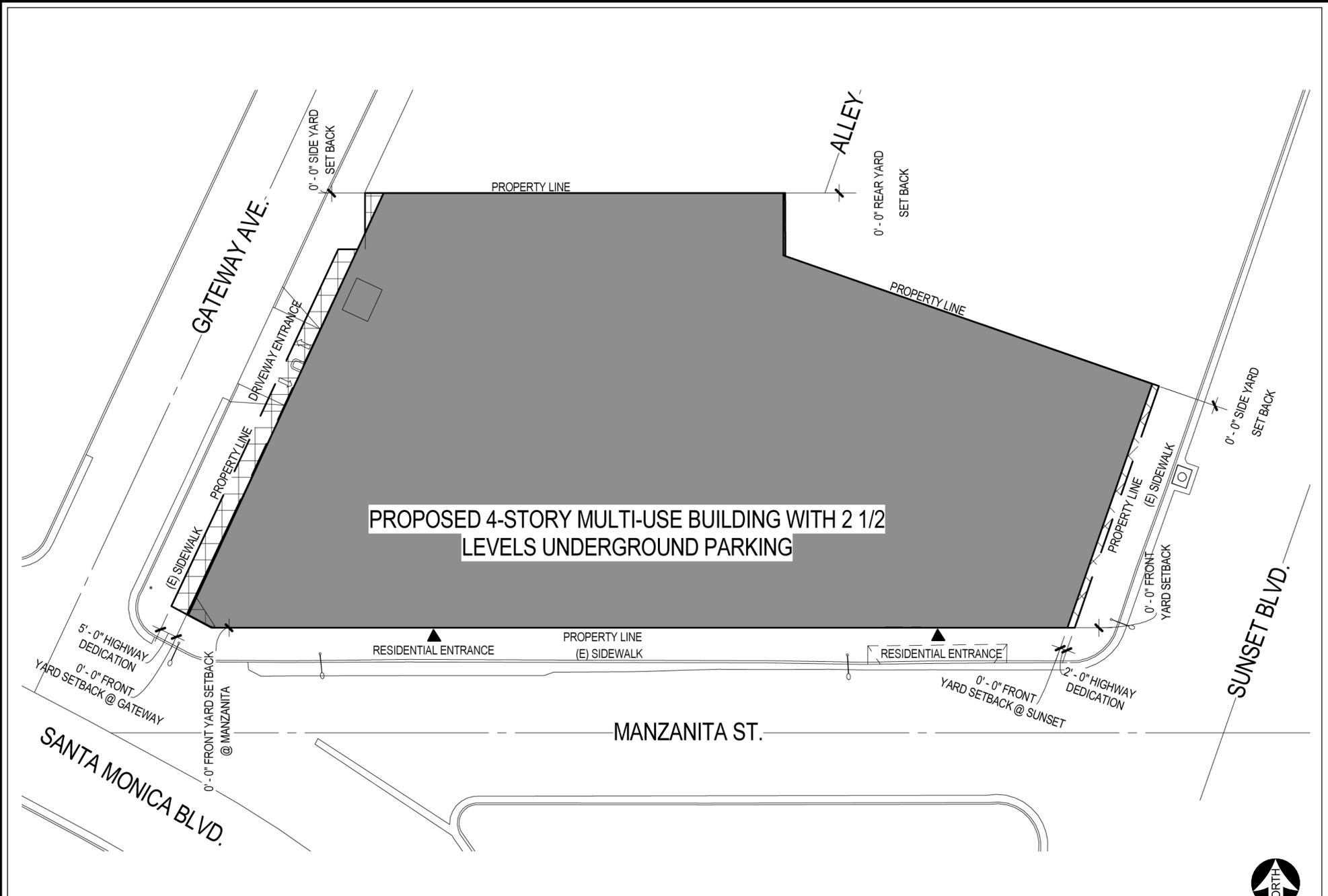
Like the Project, the buildings under Alternative 3 would be new buildings that would be reduced in size and height when compared to the Project. Development under this alternative would result in a less intense development of the Project Sites when compared to the Project, creating less apparent massing on the Sites. Overall, implementation of this alternative would result in less than significant impacts with respect to views and light/glare, and impacts would be less than the Project’s less than significant impacts, due to the less intense development of the Project Sites.

The Project would result in a significant and unavoidable shade/shadow impact on the single-family residences immediately adjacent to the northwest of Site 2 based on the City’s shadow impact thresholds, as these residences would be shaded for more than three hours between the hours of 9:00 AM and 5:00 PM during the summer and fall, and for more than three hours between the hours of 9:00 AM and 3:00 PM during the spring and winter. However, based on SB 743 and ZI No. 2451, this impact would be considered less than significant as a matter of law. Building height would be reduced under this alternative. Notwithstanding SB 743, the EIR conservatively concludes that the alternative’s reduced building on Site 2 would still cause a significant and unavoidable shade/shadow impact on the single-

family residences immediately adjacent to the northwest of Site 2, similar to the Project's significant and unavoidable impact based on the City's shadow impact thresholds.

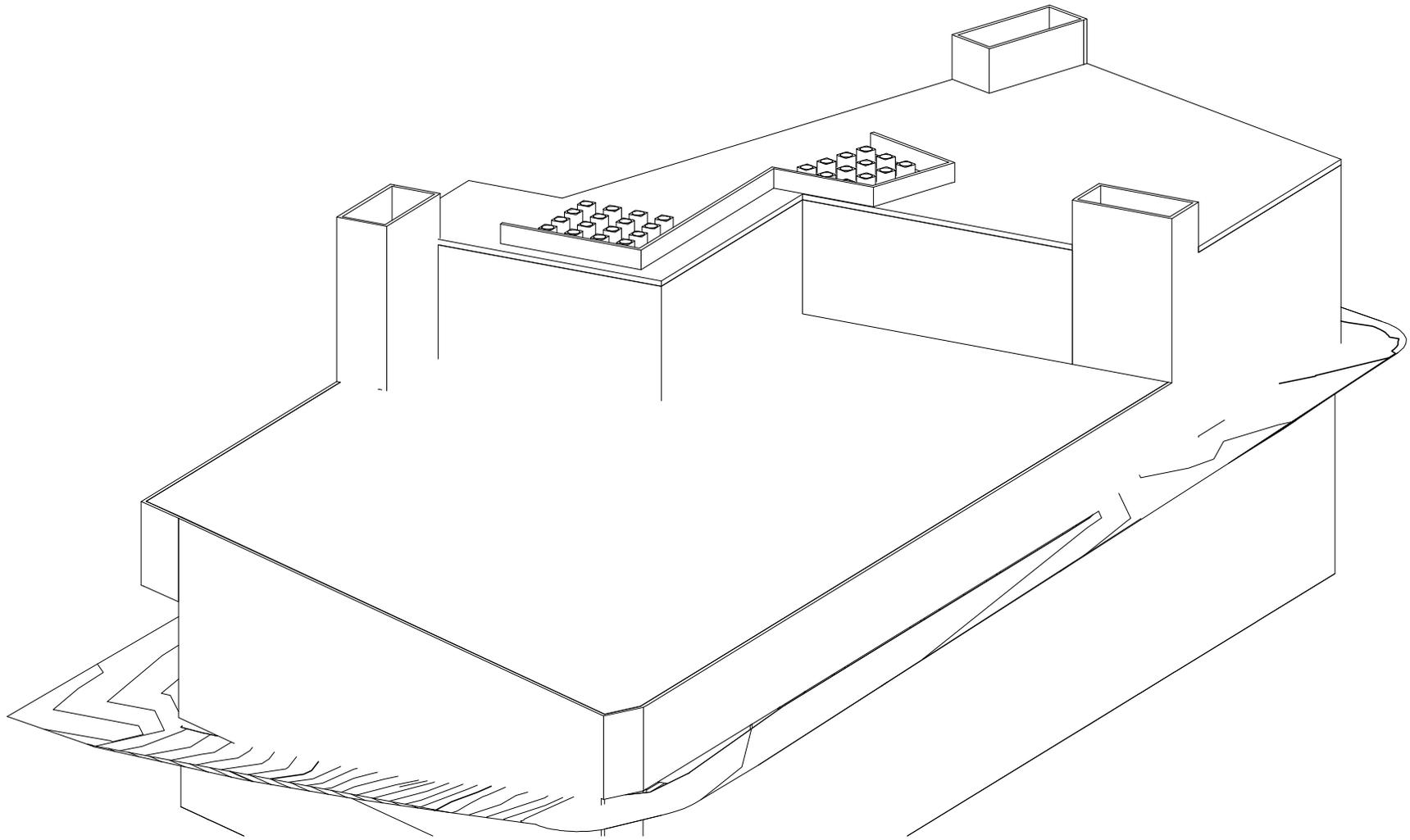


Source: KFA, 2015.



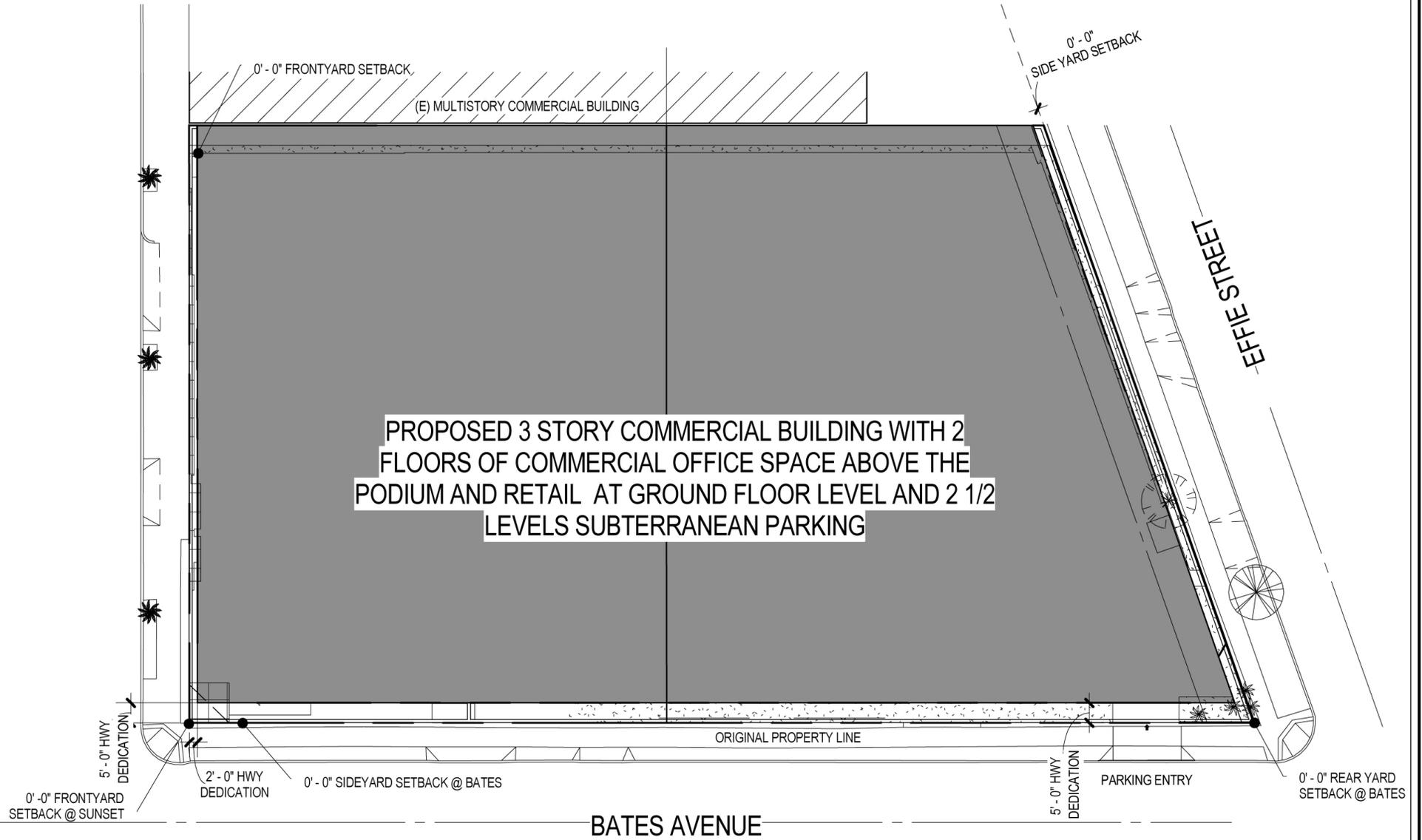
Source: KFA, 2015.





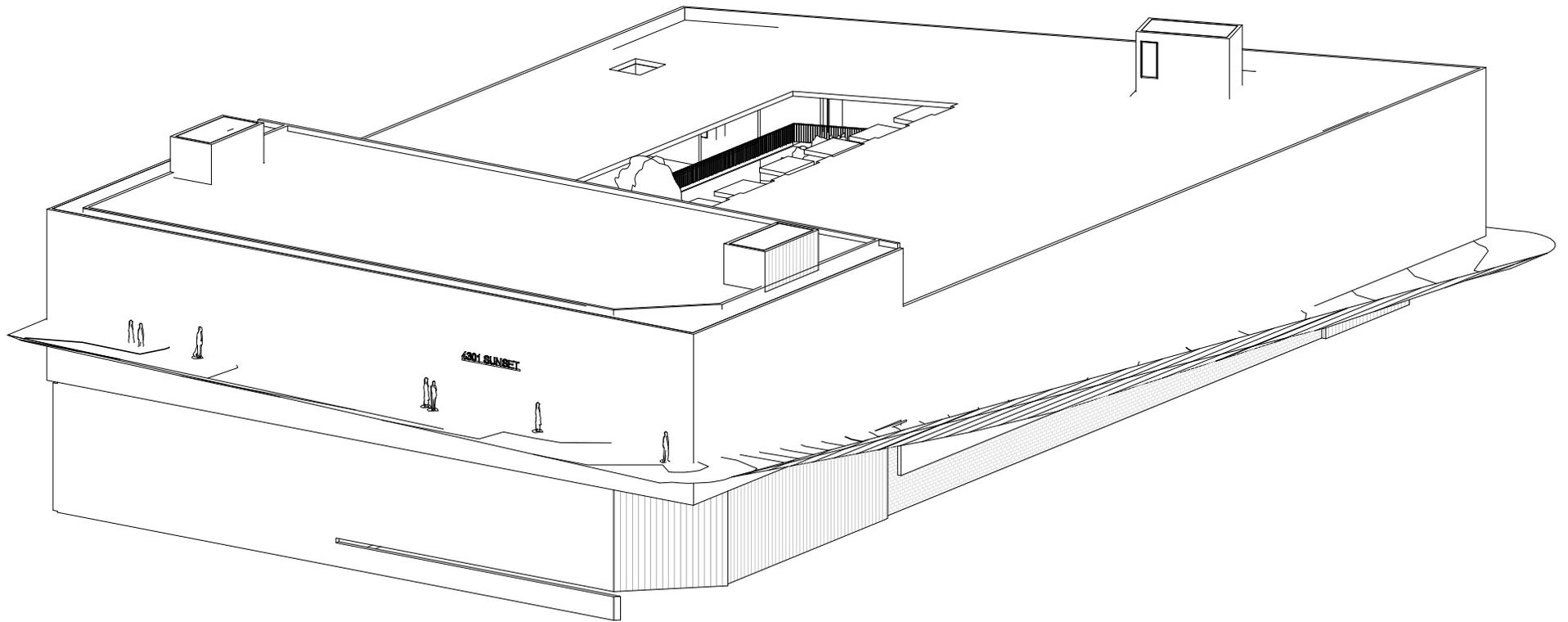
Source: KFA, 2015.

SUNSET BLVD.



Source: KFA, 2015.





Source: KFA, 2015.



Source: Scott A. Johnson, 2015.





Source: Scott A. Johnson, 2015.





Source: Scott A. Johnson, 2015.





Source: Scott A. Johnson, 2015.



Air Quality

Construction

Regional and localized construction related impacts under the Project were found to be less than significant, with implementation of Mitigation Measures C-1 through C-19. Under Alternative 3, the Project Sites would be developed with an approximate total of 138,570 square feet of commercial uses (office uses would replace the Project's residential uses). This represents an approximately 47 percent reduction in total floor area from the Project. While it is assumed that construction of this alternative would generally utilize the same construction equipment as the Project, the duration of the construction period would likely be shorter than the Project due to a smaller scale project. Further, VOC emissions associated with architectural coatings would be lower, as there would be less surface area to prime, paint, and seal. However, peak daily construction activities under this alternative would be similar to those associated with the Project. Thus, similar to the Project, it is expected that regional and localized construction-related daily emissions under this alternative would not exceed SCAQMD significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. However, VOC emissions would likely still exceed thresholds and could contribute to regional ozone violations. Localized construction-related emissions would exceed NO_x, PM₁₀, and PM_{2.5} thresholds, while CO thresholds would not be exceeded. As with the Project, implementation of Mitigation Measures C-1 through C-19 would reduce all regional and local air quality impacts below SCAQMD thresholds of significance. Therefore, the daily air quality impacts associated with the construction of Alternative 3 would be less than significant, although slightly decreased compared to the Project due to the shorter construction duration.

Operation

Regional and localized operational impacts were found to be less than significant for the Project. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Sites after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, and the operation of landscape maintenance equipment; mobile emissions would be generated by the motor vehicles traveling to and from the Project Sites. The Project would generate 2,947 daily trips. As discussed below under Transportation and Traffic, this alternative would result in an increase in daily, AM, and PM peak hour trips. Operational air quality impacts under this alternative are expected to be less than significant, although they would be greater than the Project's less than significant impacts due to the increase in daily, AM, and PM peak hour trips.

Cultural Resources

Under Alternative 3, the existing structures would be demolished. However, there are no historic resources located on any of the Project Sites. As such, like the Project, Alternative 3 would result in no impact with respect to historic resources. While Alternative 3 would result in the construction of a smaller project, the entirety of the three Project Sites would be graded for both the Project and this alternative. Therefore, this alternative would result in a similar potential to encounter archaeological or

paleontological resources when compared to the Project. Alternative 3 would implement the same mitigation measures as the Project. Therefore, impacts would be less than significant, and would be similar to the Project's less than significant impacts.

Geology and Soils

Alternative 3 would be located on the same Project Sites as the Project, which are located in the seismically active region of Southern California. The impacts with respect to seismic hazards, fault rupture, ground shaking, liquefaction, and landslides would be similar to the Project. The same mitigation measures that would be implemented with the Project would also be implemented under this alternative. Impacts under Alternative 3 associated with seismic hazards would be similar to the Project's less than significant impacts.

Grading activities would be similar to the Project. Minor erosion and siltation could occur during construction similar to the Project's less than significant impacts. Like the Project, all Site grading and Site preparation would comply with applicable provisions of the 2014 Building Code and the 2013 California Building Code for development. Impacts of this alternative for soil erosion would be similar to the Project's less than significant impacts. Overall, the geology and soils impacts under Alternative 3 would be similar to the Project's less than significant impacts.

Greenhouse Gases

As discussed above, Alternative 3 would result in a smaller project when compared to the Project. However, this alternative would result in an increase of AM and PM peak hour trips compared to the Project due the type of uses proposed (replacing the Project's residential uses with more restaurant uses and increasing office uses). Accordingly, overall operational GHG emissions generated under this alternative would be increased compared to the Project. However, these increases would be mitigated by the institution of Statewide measures from the AB 32 Scoping Plan, including the Pavley regulations that reduce 19.8 percent of GHG emissions from new vehicles. Like the Project, when compared to a No Action Taken scenario, implementation of Alternative 3 would reduce GHG emissions above the 15.8 percent threshold in the 2014 revisions to the AB 32 Scoping Plan. This alternative would also include similar energy efficient design features as the Project, and these features would be generally consistent with the applicable state and local plans at reducing GHG emissions. Ultimately, Alternative 3 would be consistent with policies at the State (e.g., AB 32 Scoping Plan), regional (SCAG RTP/SCS, SCAQMD draft Efficiency Target), and local (e.g., City Green Building Ordinance) levels. As a result, impacts with respect to GHG emissions under Alternative 3 would be less than significant, although increased when compared to the Project.

Hazards and Hazardous Materials

Under Alternative 3, the existing structures would be demolished. As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, the mitigation measures that would be implemented for the Project would address potential impacts associated with the release of hazardous materials during

construction activities. In addition, the replacement of residential uses with office uses would not result in increased use of hazardous materials during operation. Because development under this alternative would occur on the same Project Sites and the same mitigation measures would be implemented, the impacts associated with hazards and hazardous materials under this alternative would be less than significant, and would be similar to the Project's less than significant impacts.

Land Use and Planning

As this alternative eliminates the residential component of the Project, it would not require approval of the same discretionary actions as the Project. However, the all-commercial alternative would result in the need for discretionary actions other than those required for the Project, such as a zone change/variance to allow commercial uses on Site 3 residentially zoned parcels and a zone/height district change to eliminate the D limitation at Site 3 to permit a 1.5 to 1 FAR as generally allowed in the C2-1 zone/height district. Similar to the Project, this alternative would not physically divide an established community. Overall, this alternative would result in a less than significant impact with respect to land use and planning, similar to the Project's less than significant impacts.

Noise

Construction

Construction-related noise impacts were found to be significant and unavoidable for the Project. Demolition activities under Alternative 3 would be the same as the Project's demolition activities. However, this alternative would result in a shorter duration of construction activity as approximately 47 percent less floor area is proposed. However, peak construction noise levels would remain similar to the Project, as construction of this alternative would still require the use of heavy equipment for demolition, excavation for subterranean parking, Site grading, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity. However, because the City of Los Angeles defines significant construction noise impacts over a peak day or over a three-month period, the impacts would be comparable to the Project. Table VI-6 shows construction noise levels resulting from the construction of Alternative 3. As shown, Alternative 3 would still result in an ambient noise level exceeding 75 dBA at nearby sensitive receptors, with ambient noise level increases of 5 dBA or more for more than 10 days in a 3-month period, as well as an increase of 10 dBA or more at some of the sensitive receptors. The greatest impact would occur at the Silverlake Independent Jewish Community Center.

**Table VI-6
Alternative 3 - Unmitigated Construction Noise Levels**

Sensitive Receptor	Distance from Site (feet)¹	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Silverlake Independent Jewish Community Center	30	83.1	55.6	83.1	27.5
Residences South of Sunset Boulevard on Bates Avenue	210	70.8	56.6	70.9	14.3
Residences South of Sunset Boulevard/Santa Monica Boulevard on Manzanita Street	20	83.5	65.5	83.5	18.0
Residences North of Sunset Boulevard on Sanborn Avenue	110	76.1	63.2	76.3	13.1
Residences South of Sunset Boulevard on Sanborn Avenue	20	83.2	62.8	83.2	20.4
Thomas Star King Middle School	250	69.1	69.2	72.2	3.0
Residences on Sunset Boulevard near Manzanita Street Intersection	100	77.3	69.4	77.9	8.5
Laguna Senior Apartments	235	71.3	70.4	73.9	3.5
Residences on Gateway Avenue between Myra Avenue and Santa Monica Boulevard	5	83.2	59.6	83.2	23.6
Mack Sennett Studios	60	81.4	71.8	81.9	10.1

*1. Distance noted is the distance of the receptor to the nearest of the 3 construction sites.
SOURCE: DKA Planning, 2015.*

Alternative 3 would implement the same mitigation measures as the Project. Table VI-7 shows mitigated construction noise levels resulting from construction of Alternative 3. Although the ambient noise level would be reduced below 75 dBA at each of the 10 sensitive receptors analyzed, there would still be ambient noise increases over 5 dBA for more than 10 days in a three-month period, as well as an increase of 10 dBA or more at two of the sensitive receptors. Therefore, Alternative 3's construction noise impacts would be significant and unavoidable and similar to the Project.

Table VI-7
Alternative 3 - Mitigated Construction Noise Levels

Sensitive Receptor	Distance from Site (feet)¹	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Silverlake Independent Jewish Community Center	30	70.1	55.6	70.2	14.6
Residences South of Sunset Boulevard on Bates Avenue	210	57.8	56.6	60.2	3.6
Residences South of Sunset Boulevard/Santa Monica Boulevard on Manzanita Street	20	70.5	65.5	71.7	6.2
Residences North of Sunset Boulevard on Sanborn Avenue	110	63.1	63.2	66.1	2.9
Residences South of Sunset Boulevard on Sanborn Avenue	20	70.2	62.8	70.9	8.1
Thomas Star King Middle School	250	56.1	69.2	69.4	0.2
Residences on Sunset Boulevard near Manzanita Street Intersection	100	64.3	69.4	70.6	1.2
Laguna Senior Apartments	235	58.3	70.4	70.7	0.3
Residences on Gateway Avenue between Myra Avenue and Santa Monica Boulevard	5	70.2	59.6	70.6	11.0
Mack Sennett Studios	60	68.4	71.8	73.4	1.6

1. Distance noted is the distance of the receptor to the nearest of the 3 construction sites.
SOURCE: DKA Planning, 2015.

Construction-related groundborne vibration impacts were found to be significant and unavoidable for the Project. As discussed above, the maximum daily construction activities under this alternative would be substantially similar to the Project. Under this alternative, the nearest sensitive receptors to the Project Sites would be approximately 15 feet from occasional heavy equipment activity and could experience vibration levels up to 0.452 inches per second at Site 2. Vibration levels at these receptors would exceed the potential building damage threshold of 0.2 inches per second. Vibration annoyance levels would be approximately 101 VdB at Site 2. Alternative 3 would implement the same mitigation measures as the Project. However, implementation of these mitigation measures would not reduce impacts to a less than significant level. Therefore, construction vibration impacts would be significant and unavoidable, and similar to the Project.

Operation

Operational noise impacts were found to be less than significant for the Project. With respect to traffic and vehicular noise, Alternative 3 would result in an increase in daily, AM, and PM peak hour trips, due to the different uses proposed. Overall, impacts with respect to roadway noise levels would be slightly increased compared to the Project. However, page I.2-9 of the City of Los Angeles CEQA Thresholds Guide states: “Noise levels increase approximately 3 dBA for each doubling of roadway traffic volume,

assuming that the speed and fleet mix remain constant. A change in vehicle speed can also change noise levels. If vehicle speed and fleet mix can be assumed to remain constant after project implementation, and the project would result in traffic that is less than double the existing traffic, then the project's mobile noise impacts can be assumed to be less than significant." As shown under Transportation/Traffic, below, the existing roadway volumes would not be doubled by Alternative 3. As such, impacts related to roadway noise under Alternative 3 would be less than significant, although slightly increased compared to the Project.

Similar to the Project, this alternative would also include subterranean parking that would generate noise from sources such as engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. These noise levels under Alternative 3 would be substantially similar to those experienced under the Project. As such, operational noise levels with respect to parking areas would be less than significant and essentially equivalent to the Project.

With respect to non-vehicular on-site noise sources, Alternative 3 would be substantially similar to the Project. This alternative would be subject to some of the same mitigation measures as the Project, which would ensure that noise from HVAC systems do not significantly impact nearby sensitive receptors. However, as this alternative does not contain residential uses, it would not be subject to mitigation measures requiring double-paned windows and vegetation sound walls. Overall, on-site operational noise impacts would be less than significant under this alternative and essentially equivalent to the Project.

Population and Housing

Alternative 3 would consist of a smaller project than the Project. However, this alternative would replace the Project's residential uses with office uses and additional restaurant space. As shown in Table VI-8, Alternative 3 would generate 374 new jobs.

**Table VI-8
Alternative 3 Job Generation**

Land Use	Size	Rate	Total
Site 1			
Retail/Restaurant	17,850 sf	1 employee / 369 sf	48
Office	26,070 sf	1 employee / 372 sf	70
Site 2			
Restaurant	17,700 sf	1 employee / 369 sf	48
Office	22,640 sf	1 employee / 372 sf	61
Site 3			
Restaurant	9,450 sf	1 employee / 369 sf	26
Office	44,860 sf	1 employee / 372 sf	121
Total (All Sites)			374
<i>Source: LAUSD, 2012 Developer Fee Justification Study (Table 11). "Neighborhood Shopping Center" rate was used to calculate employment generation for the retail/restaurant uses. "Corporate Office" rate was used to calculate employment generation for the office uses. Table: CAJA Environmental Services, May 2015.</i>			

It is likely that there are unemployed workers in the Project area who could fill the jobs generated by this alternative. The removal of three occupied housing units would not substantially displace a number of existing housing or people and would not induce growth in an area. Overall, impacts with respect to population and housing would be less than significant.

Public Services

Fire Protection

Alternative 3 would consist of a smaller project compared to the Project. However, this alternative would replace the Project's residential uses with office uses. Therefore, the daytime population of Alternative 3 would likely be higher than the daytime population of the Project (as many of the Project residents would be expected to be at work or school), while the nighttime population of the Project would be higher than this alternative. As discussed in Section IV.L.1 of this Draft EIR, the Project would not result in the need for a new or physically altered governmental facility, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, and other performance objectives of the LAFD. The expected demands of the LAFD by Alternative 3 would be similar to the demands of the Project. As such, the LAFD could accommodate this alternative without construction of a new facility. Alternative 3's impacts with respect to fire protection would be less than significant and similar to the Project's less than significant impacts.

Police Protection

Alternative 3 would consist of a smaller project compared to the Project. However, this alternative would replace the Project's residential uses with office uses. Therefore, the daytime population of Alternative 3 would likely be higher than the daytime population of the Project (as many of the Project residents would be expected to be at work or school), while the nighttime population of the Project would be higher than this alternative. As discussed in Section IV.L.2 of this Draft EIR, the Project would not significantly impact police services. While Alternative 3 proposes a smaller project in terms of building mass and square footage, the expected demands of the LAPD by Alternative 3 would be similar to the demands of the Project. As such, the LAPD could accommodate this alternative without construction of a new facility. Overall, Alternative 3's impacts with respect to police protection would be less than significant and similar to the Project's less than significant impacts.

Schools

Alternative 3 would consist of a smaller project compared to the Project. However, this alternative would replace the Project's residential uses with office uses. As a commercial development, this alternative would not result in additional students or an increase in the demand for school services. Therefore, this alternative would result in no impact with respect to schools, which would be less than the Project's less than significant impacts.

Parks

Alternative 3 would consist of a smaller project compared to the Project. However, this alternative would replace the Project's residential uses with office uses. As a commercial development, this alternative would not result in any new permanent residents or an increase in the demand for parks. Therefore, this alternative would result in no impact with respect to parks and recreational facilities, which would be less than the Project's less than significant impacts.

Libraries

Alternative 3 would consist of a smaller project compared to the Project. However, this alternative would replace the Project's residential uses with office uses. As a commercial development, this alternative would not result in any new permanent residents or an increase in the demand for library services. Therefore, this alternative would result in no impact with respect to libraries, which would be less than the Project's less than significant impacts.

Transportation and Traffic

Alternative 3 would consist of a smaller project in terms of building mass and square footage as compared to the Project. However, this alternative would replace the Project's residential uses with commercial uses. As shown in Table VI-9, Alternative 3 would generate 4,315 total daily trips, including 424 AM peak hour trips and 382 PM peak hour trips, which is an increase of 1,342 daily trips, 187 AM peak hour

trips, and 131 PM peak hour trips when compared to the Project. In addition, as shown in Tables VI-10 and VI-11, Alternative 3 would result in the same significant and unavoidable impact at the Hoover Street/Fountain Avenue/Sunset Boulevard intersection during the Existing with Project scenario and in the Future (2018) with Project scenario.

Table VI-9
Alternative 3 – Trip Generation

Weekday Trip Generation – Site 1											
Land Use	Size	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate ¹	Total	Rate ¹	Total	In	Out	Rate ¹	Total	In	Out
Specialty Retail Center	3.87 ksf	44.32	172	6.84	27	13	14	2.71	11	5	6
Transit Credit		-15%	-26	-15%	-4	-2	-2	-15%	-2	-1	-1
Pass-by Trips		-10%	-15	-10%	-2	-1	-1	-10%	-1	0	-1
Net Trips			131		21	10	11		8	4	4
High-Turnover Restaurant	13.98 ksf	127.15	1,777	10.81	152	79	73	9.85	137	81	56
Transit Credit		-15%	-267	-15%	-23	-12	-11	-15%	-20	-12	-8
Pass-by Trips		-20%	-302	-20%	-25	-13	-12	-20%	-24	-14	-10
Net Trips			1,208		104	54	50		93	55	38
General Office Building	26.07 ksf	11.03	288	1.56	41	36	5	1.49	39	7	32
Transit Credit		-15%	-43	-15%	-6	-5	-1	-15%	-6	-1	-5
Net Trips			245		35	31	4		33	6	27
Total Net Trips			1,584		160	95	65		134	65	69
Internal Trips			-79		-8	-4	-4		-6	-3	-3
Total External Trips			1,505		152	91	61		128	62	66
Weekday Trip Generation – Site 2											
Land Use	Size (ksf/du)	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate ¹	Total	Rate ¹	Total	In	Out	Rate ¹	Total	In	Out
High-Turnover Restaurant	17.7 ksf	127.15	2,251	10.81	191	99	92	9.85	174	103	71
Transit Credit		-15%	-338	-15%	-29	-15	-14	-15%	-26	-15	-11
Pass-by Trips		-20%	-383	-20%	-33	-17	-16	-20%	-30	-18	-12
Net Trips			1,530		129	67	62		118	70	48
General Office Building	22.64 ksf	11.03	250	1.56	35	31	4	1.49	34	6	28
Transit Credit		-15%	-38	-15%	-6	-5	-1	-15%	-5	-1	-4
Net Trips			212		29	26	3		29	5	24
Total Net Trips			1,742		158	93	65		147	75	72
Internal Trips			-132		-12	-6	-6		-10	-5	-5
Total External Trips			1,610		146	87	59		137	70	67
Weekday Trip Generation – Site 3											
Land Use	Size	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate ¹	Total	Rate ¹	Total	In	Out	Rate ¹	Total	In	Out
High-Turnover Restaurant	9.45 ksf	127.15	1,201	10.81	102	53	49	9.85	93	55	38
Transit Credit		-15%	-180	-15%	-15	-15	-7	-15%	-14	-8	-6
Pass-by Trips		-20%	-204	-20%	-17	-17	-8	-20%	-15	-9	-6

Net Trips			817		70	70	34		64	38	26
General Office Building	44.86 ksf	11.03	495	1.56	70	70	8	1.49	67	11	55
Transit Credit		-15%	-74	-15%	-10	-10	-1	-15%	-10	-2	-8
Net Trips			421		60	60	7		57	9	47
Total Net Trips			1,238		130	130	41		121	47	73
Internal Trips			-38		-4	-4	-2		-4	-2	-2
Total External Trips			1,200		126	126	39		117	45	72

Note: ksf = thousand square feet du = dwelling unit

¹Trip rates are based on 1,000 square feet for retail and per dwelling units for residential.

Table VI-10
Intersection LOS – Existing Plus Alternative 3

No.	Intersection	Peak Hour	Existing		Existing Plus Alt 3		Change in V/C	Impact?
			V/C	LOS	V/C	LOS		
1	Vermont / Sunset	AM	0.696	B	0.702	C	0.006	No
		PM	0.870	D	0.878	D	0.008	No
2	Vermont / Fountain	AM	0.611	B	0.622	B	0.011	No
		PM	0.633	B	0.648	B	0.015	No
3	Hoover / Fountain / Sunset	AM	0.910	E	0.937	E	0.027	Yes
		PM	0.856	D	0.874	D	0.018	No
4	Hyperion / Fountain	AM	0.669	B	0.697	B	0.028	No
		PM	0.696	B	0.723	C	0.027	No
5	Bates / Sunset	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					
6	Manzanita / Sunset	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					
7	Sanborn / Santa Monica / Sunset	AM	0.569	A	0.642	B	0.073	No
		PM	0.521	A	0.569	A	0.048	No
8	Hyperion / Sunset	AM	0.599	A	0.615	B	0.016	No
		PM	0.637	B	0.654	B	0.017	No
9	Lucile / Sunset	AM	0.730	C	0.746	C	0.016	No
		PM	0.675	B	0.691	B	0.016	No
10	Hoover / Santa Monica	AM	0.658	B	0.688	B	0.030	No
		PM	0.677	B	0.705	C	0.028	No
11	Manzanita / Gateway / Santa Monica	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					

v/c = volume/capacity
Source: AECOM, April 2015.

**Table VI-11
Intersection LOS – 2018 With Alternative 3**

No.	Intersection	Peak Hour	Without Alt 3		With Alt 3		Change in V/C	Impact?
			V/C	LOS	V/C	LOS		
1	Vermont / Sunset	AM	0.721	C	0.727	C	0.006	No
		PM	0.902	E	0.909	E	0.007	No
2	Vermont / Fountain	AM	0.618	B	0.629	B	0.011	No
		PM	0.648	B	0.663	B	0.015	No
3	Hoover / Fountain / Sunset	AM	0.932	E	0.958	E	0.026	Yes
		PM	0.880	D	0.898	D	0.018	No
4	Hyperion / Fountain	AM	0.674	B	0.702	C	0.028	No
		PM	0.704	C	0.730	C	0.026	No
5	Bates / Sunset	AM	Intersection Not Evaluated					
		PM						
6	Manzanita / Sunset	AM	Intersection Not Evaluated					
		PM						
7	Sanborn / Santa Monica / Sunset	AM	0.588	A	0.661	B	0.073	No
		PM	0.532	A	0.592	A	0.060	No
8	Hyperion / Sunset	AM	0.613	B	0.628	B	0.015	No
		PM	0.651	B	0.668	B	0.017	No
9	Lucile / Sunset	AM	0.749	C	0.765	C	0.016	No
		PM	0.692	B	0.708	C	0.016	No
10	Hoover / Santa Monica	AM	0.680	B	0.711	C	0.031	No
		PM	0.706	C	0.735	C	0.029	No
11	Manzanita / Gateway / Santa Monica	AM	Intersection Not Evaluated					
		PM						

*v/c = volume/capacity.
Source: AECOM, April 2015.*

Utilities

Water

Under Alternative 3, the Project Sites would be developed with a smaller project compared to the Project. However, this alternative would replace the Project's residential uses with commercial uses. The Project would result in the demand for approximately 43,000 gpd of water (see Section IV.N.1, Water). Alternative 3 would result in the demand for approximately 28,530 gpd of water (see Table VI-12). The decrease in water demand when compared to the Project would represent a negligible decrease compared to the overall capacity of the LADWP. As the LADWP has stated it could accommodate the Project, it would also be able to accommodate this alternative. Overall, Alternative 3 would result in a less than significant impact with respect to water, with a slight reduction when compared to the Project's less than significant impact.

**Table VI-12
Alternative 3 Water Demand**

Land Use	Size	Demand Rate (gpd)	Total Water (gpd)
Site 1			
Existing (Removed)			
Residential (SFD 9-bedroom)	1 DU	590 gallons / DU	(590)
Office	1,279 sf	153.6 gallons / 1,000 sf	(197)
Warehouse	3,771 sf	38.4 gallons / 1,000 sf	(145)
Proposed			
Office	26,070 sf	153.6 / 1,000 sf	4,004
Retail	3,870 sf	32 / 1,000 sf	124
Restaurant	13,980 sf	384 / 1,000 sf	5,368
Total Site 1 (Proposed – Existing)			8,564
Site 2			
Existing (Removed)			
Commercial	7,400 sf	64 gallons / 1,000 sf	(474)
Proposed			
Office	22,640 sf	153.6 / 1,000 sf	3,478
Restaurant	17,700 sf	384 / 1,000 sf	6,797
Total Site 2 (Proposed – Existing)			9,801
Site 3			
Existing (Removed)			
Residential (SFD 2-bedroom)	1 DU	177 gallons / DU	(177)
Residential (Duplex 2-bedroom)	1 DU	177 gallons / DU	(177)
Proposed			
Office	44,860 sf	153.6 / 1,000 sf	6,890
Restaurant	9,450 sf	384 / 1,000 sf	3,629
Total Site 3 (Proposed – Existing)			10,165
Total All Sites (Proposed – Existing)			28,530
<i>sf =square feet; gpd = gallons per day. Source (rates): Water use based on correspondence from Ali Poosti, Division Manager, Wastewater Engineering Services Division, Bureau of Sanitation, October 2, 2014 and City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors. Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.</i>			

Wastewater

Under Alternative 3, the Project Sites would be developed with a smaller project compared to the Project. However, this alternative would replace the Project's residential uses with commercial uses. The Project would result in an increase of wastewater generation of approximately 35,995 gpd (see Section IV.N.2, Wastewater). Alternative 3 would generate 22,228 gpd of wastewater (see Table VI-13). The decrease of wastewater generation when compared to the Project would represent a negligible decrease compared to the overall capacity of the Hyperion Treatment Plant and local infrastructure. As the Hyperion Treatment Plant has adequate capacity to accommodate the Project, it would also be able to accommodate this alternative. Overall, Alternative 3 would result in a less than significant impact with respect to wastewater, with a slight reduction when compared to the Project's less than significant impact.

**Table VI-13
Alternative 3 Wastewater Generation**

Land Use	Size	Generation Rate (gpd)	Total Wastewater (gpd)
Site 1			
Existing (Removed)			
Residential (SFD 9-bedroom)	1 DU	500 gallons / DU	(500)
Office	1,279 sf	120 gallons / 1,000 sf	(153)
Warehouse	3,771 sf	30 gallons / 1,000 sf	(113)
Proposed			
Office	26,070 sf	120 gallons / 1,000 sf	3,128
Retail	3,870 sf	25 gallons / 1,000 sf	97
Restaurant	13,980 sf	300 gallons / 1,000 sf	4,194
Total Site 1 (Proposed – Existing)			6,653
Site 2			
Existing (Removed)			
Commercial	7,400 sf	50 gallons / 1,000 sf	(370)
Proposed			
Office	22,640 sf	120 gallons / 1000 sf	2,717
Restaurant	17,700 sf	300 gallons / 1,000 sf	5,310
Total Site 2 (Proposed – Existing)			7,657
Site 3			
Existing (Removed)			
Residential (SFD 2-bedroom)	1 DU	150 gallons / DU	(150)
Residential (Duplex 2-bedroom)	1 DU	150 gallons / DU	(150)
Proposed			

**Table VI-13
Alternative 3 Wastewater Generation**

Land Use	Size	Generation Rate (gpd)	Total Wastewater (gpd)
Office	44,860 sf	120 gallons / 1,000 sf	5,383
Restaurant	9,450 sf	300 gallons / 1,000 sf	2,835
Total Site 3 (Proposed – Existing)			7,918
Total All Sites (Proposed – Existing)			22,228
<i>sf = square feet; gpd = gallons per day</i>			
<i>Source (rates): Written Correspondence from Ali Poosti, Acting Division Manager, Wastewater Engineering Services Division, BOS, October 2, 2014.</i>			

Solid Waste

Under Alternative 3, the Project Sites would be developed with a smaller project compared to the Project. However, this alternative would replace the Project's residential uses with commercial uses. The Project would result in an increase of approximately 3,783 pounds of solid waste per day during operation (see Section IV.N.3, Solid Waste). Alternative 3 would generate 682 lbs per day (see Table VI-14). However, the remaining daily intake capacity of the Sunshine Canyon City/County Landfill would have adequate capacity to accommodate the solid waste generated by this alternative as well as the Project. Overall, Alternative 3 would result in a less than significant impact with respect to solid waste, with a decrease when compared to the Project's less than significant impact.

**Table VI-14
Alternative 3 Solid Waste Generation**

Land Use	Size	Generation Rate (lbs/day)	Total Solid Waste (lbs)
Site 1			
Existing (Removed)			
Residential	1 DU	12.23 pounds / DU	(12.23)
Office	1,279 sf	6 pounds / 1,000 sf	(8)
Warehouse	3,771 sf	6 pounds / 1,000 sf	(23)
Proposed			
Office	26,070 sf	6 lbs / 1,000 sf	156
Retail	3,870 sf	5 lbs / 1,000 sf	19
Restaurant	13,980 sf	5 lbs / 1,000 sf	70
Total Site 1 (Proposed – Existing)			202
Site 2			
Existing (Removed)			

**Table VI-14
Alternative 3 Solid Waste Generation**

Land Use	Size	Generation Rate (lbs/day)	Total Solid Waste (lbs)
Commercial	7,400 sf	5 pounds / 1,000 sf	(37)
Proposed			
Office	22,640 sf	6 lbs / 1,000 sf	136
Restaurant	17,700 sf	5 lbs / 1,000 sf	89
Total Site 2 (Proposed – Existing)			188
Site 3			
Existing (Removed)			
Residential	1 DU	12.23 pounds / DU	(12.23)
Residential	1 DU	12.23 pounds / DU	(12.23)
Proposed			
Office	44,860 sf	6 lbs / 1,000 sf	269
Restaurant	9,450 sf	5 lbs / 1,000 sf	47
Total Site 3 (Proposed – Existing)			292
Total All Sites (Proposed – Existing)			682
<i>sf = square feet; lbs = pounds</i> <i>Rates: CalRecycle Estimated Solid Waste Generation Rates:</i> http://www.calrecycle.ca.gov/wastechar/wastegenrates/ <i>Residential – 12.23 pounds/unit; source: City of Los Angeles CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles (DRAFT).</i> <i>Retail – 5 pounds/1,000 sf; source: City of LA Dept. of City Planning doc "EIR Manual for Private Projects".</i>			

Energy

Under Alternative 3, the Project Sites would be developed with a smaller project compared to the Project. However, this alternative would replace the Project’s residential uses with commercial uses. The Project would result in the demand for approximately 2,377,885 kWh/year of electricity and 1,225,754 cf/month of natural gas (see Section IV.N.4, Energy). Alternative 3 would result in the demand for approximately 3,065,674 kWh/year of electricity and 278,825 cf/month of natural gas (see Table VI-15 and Table VI-16). Therefore, this alternative would result in an increase with respect to electricity demand and a decrease with respect to natural gas demand when compared to the Project. The LADWP and SCG plan for growth in their systems to accommodate and deliver electricity and natural gas, respectively. Overall, Alternative 3 would result in a less than significant impact with respect to energy, with a slight increase when compared to the Project’s less than significant impacts for electricity and a decrease when compared to the Project’s less than significant impacts for natural gas.

**Table VI-15
Alternative 3 Electricity Demand**

Land Use	Size	Demand Rate (kw-h/yr) ¹	Total Electricity (kw-h/yr)
Site 1			
Existing (Removed)			
Residential	1 DU	5,626.50 kw-h / DU	(5,626.5)
Office	1,279 sf	12.95 kw-h / sf	(16,563)
Warehouse	3,771 sf	4.35 kw-h / sf	(16,404)
Proposed			
Office	26,070 sf	12.95 kw-h/sf	337,607
Retail	3,870 sf	13.55 kw-h/sf	52,439
Restaurant	13,980 sf	47.45 kw-h/sf	663,351
Total Site 1 (Proposed – Existing)			1,014,804
Site 2			
Existing (Removed)			
Commercial	7,400 sf	13.55 kw-h / sf	(100,270)
Proposed			
Office	22,640 sf	12.95 kw-h/sf	293,188
Restaurant	17,700 sf	47.45 kw-h/sf	839,865
Total Site 2 (Proposed – Existing)			1,032,783
Site 3			
Existing (Removed)			
Residential	1 DU	5,626.50 kw-h / DU	(5,626.50)
Residential	1 DU	5,626.50 kw-h / DU	(5,626.50)
Proposed			
Office	44,860 sf	12.95 kw-h/sf	580,937
Restaurant	9,450 sf	47.45 kw-h/sf	448,403
Total Site 3 (Proposed – Existing)			1,018,087
Total All Sites (Proposed – Existing)			3,065,674
<p><i>Notes:</i> <i>sf = square feet; kW-h = kilowatt-hour; yr = year</i> ¹ <i>Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate. The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i></p>			

**Table VI-16
Alternative 3 Natural Gas Demand**

Land Use	Size	Demand Rate (cf/mo)¹	Total Natural Gas (cf/mo)
Site 1			
Existing (Removed)			
Residential	1 DU	6,665 cf / DU	(6,665)
Office	1,279 sf	2.0 cf / sf	(2.6)
Warehouse	3,771 sf	2.9 cf / sf	(11)
Proposed			
Office	26,070 sf	2.0 cf/sf	52,140
Retail	3,870 sf	2.9 cf/sf	11,223
Restaurant	13,980 sf	2.9 cf/sf	40,542
Total Site 1 (Proposed – Existing)			97,226
Site 2			
Existing (Removed)			
Commercial	7,400 sf	2.9 cf / sf	(21,460)
Proposed			
Office	22,640 sf	2.0 cf/sf	45,280
Restaurant	17,700 sf	2.9 cf/sf	51,330
Total Site 2 (Proposed – Existing)			75,150
Site 3			
Existing (Removed)			
Residential	1 DU	6,665 cf / DU	(6,665)
Residential	1 DU	4,011.5 cf / DU	(4,011.5)
Proposed			
Office	44,860 sf	2.0 cf/sf	89,720
Restaurant	9,450 sf	2.9 cf/sf	27,405
Total Site 3 (Proposed – Existing)			106,449
Total All Sites (Proposed – Existing)			278,825
<p><i>Notes:</i> <i>sf =square feet; DU = dwelling units; cf = cubic feet; mo = month</i></p> <p>¹<i>SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate</i> <i>The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i></p>			

Relationship to Project Objectives

Alternative 3 would fail to meet key Project objectives, as it would not provide much needed housing and would not increase the available affordable housing stock in the Project area.

Reduction of Significant Project Impacts

The Project would result in significant and unavoidable impacts with respect to shade/shadow (Site 2) (which are conservatively being disclosed and treated as significant and unavoidable, notwithstanding SB 743, which deems shade shadow impacts in mapped “Transit Priority Areas” less than significant as a matter of law), Project-specific and cumulative construction noise and vibration, and Project-specific and cumulative traffic at the Hoover Street/Fountain Avenue/Sunset Boulevard intersection. Alternative 3 would result in the same significant and unavoidable impacts as the Project.

Alternative 4: Hotel and Reduced Residential Alternative

Under Alternative 4, Sites 2 and 3 would be developed with the same buildings and uses as proposed for the Project. However, under this Alternative, Site 1 would be developed with a smaller scale, boutique hotel in place of the Project’s larger mixed-use building that includes retail, restaurant, residential and office uses. A new C2 lot has been added to the Site 1 in order to improve the functionality, design, and overall feasibility of a hotel development on this Site, increasing the total Site 1 lot area to 36,770 square feet. For example, the additional lot allows the Project to accommodate Code-required parking for the hotel in a single subterranean level, as opposed to two levels for the Proposed Project on Site 1. Elimination of a second subterranean parking level reduces grading, dirt export and the overall construction time, thereby also reducing the amount of construction related noise/vibration and air quality impacts. Plans for the hotel proposed for Site 1 are included in Figures VI-21 through VI-26. The three Project Sites would therefore be developed as follows:

- Site 1 would be developed with 94 hotel rooms and 4,000 square feet of restaurant uses, for a total of 55,155 square feet;
- Site 2 would be developed with 91 residential units and 10,000 square feet of commercial space, for a total of 80,670 square feet; and
- Site 3 would be developed with 122 residential units, 4,500 square feet of fitness center uses, and 1,000 square feet of restaurant uses, for a total of 102,100 square feet.

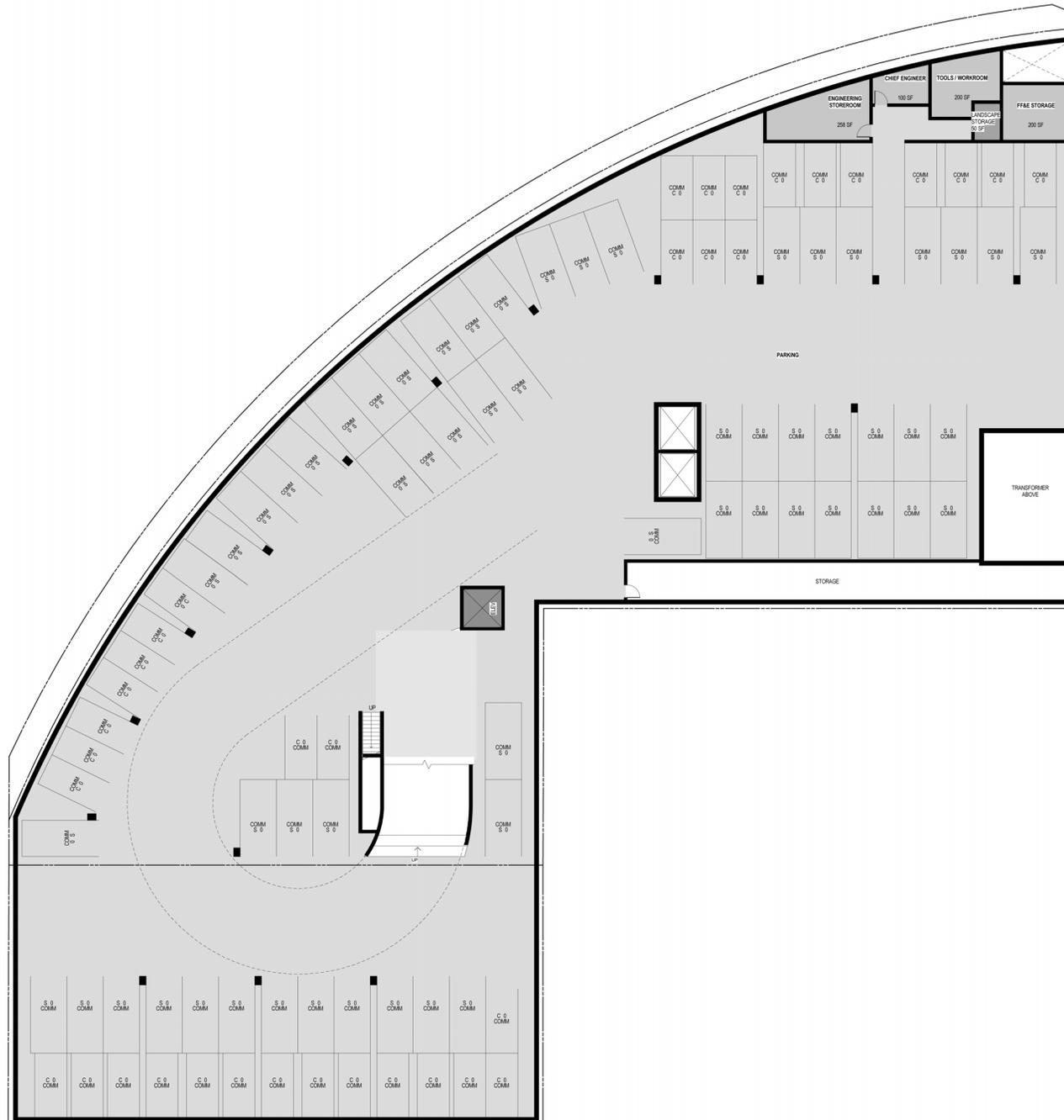
Overall, the Project constructed under Alternative 4 would have a total of 237,925 square feet.

Aesthetics

Like the Project, the buildings under Alternative 4 would be new buildings that would be of similar size as the Project. However, the building on Site 1 would be substantially reduced in size when compared to the Project building on Site 1 and would only rise to four stories (as opposed to five stories for the

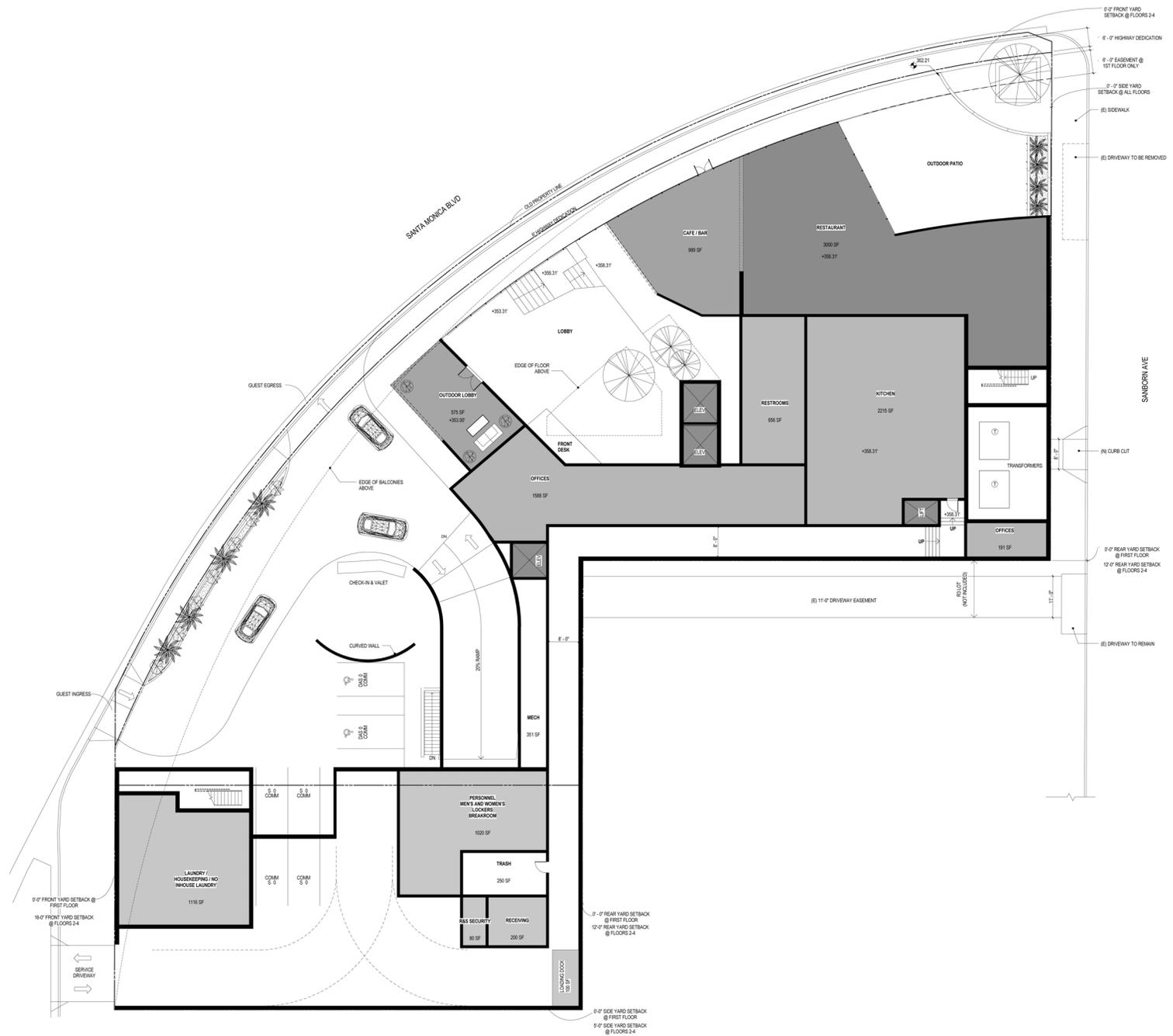
Project), with a maximum height of 57 feet as measured from grade (lowest point on the Site, five feet from the building) to the parapet, which is a reduction in height of 11 feet and one story when compared to the 68-foot Project. Unlike the proposed mixed-use Project at Site 1, the hotel building would be consistent with the underlying C2-1VL zone's 1.5 to 1 FAR and building height limit (as measured in feet from the lowest point on grade, five feet from the building).³ Therefore, impacts with respect to massing, views, and light/glare would be comparable to the Project's less than significant impacts, but meaningfully reduced with respect to Site 1. As shown in Figures VI-27 through VI-30, the building proposed on Site 1 for Alternative 4 would not cause any significant shade/shadow impacts. The Project would result in a significant and unavoidable shade/shadow impact on the single-family residences immediately adjacent to the northwest of Site 2 based on the City's shadow impact thresholds, as these residences would be shaded for more than three hours between the hours of 9:00 AM and 5:00 PM during the summer and fall, and for more than three hours between the hours of 9:00 AM and 3:00 PM during the spring and winter. However, based on SB 743 and ZI No. 2451, this impact would be considered less than significant as a matter of law. As this alternative proposes the same building for Site 2 as the Project, this alternative would also result in the same significant and unavoidable shade/shadow impact on the single-family residences immediately adjacent to the northwest of Site 2, based on the City's shadow impact thresholds.

³ *The building would comply with the overall LAMC 57-foot height limit as measured from lowest point on grade five feet from the building (i.e., 45-foot height limit per C2-1VL zone/height district + additional 12-feet permitted for a site that includes a slope greater than 20-feet per LAMC Section 12.21.1B.2 = 57 foot overall height limit). However, portions of the building exceed the LAMC Section 12.21.1B.2 45-foot "parallel plane projection" height limit, up to a maximum of 51-feet (i.e., height as measured from the highest point of the roof structure or parapet wall to the elevation of the ground surface which is vertically below this measurement point).*

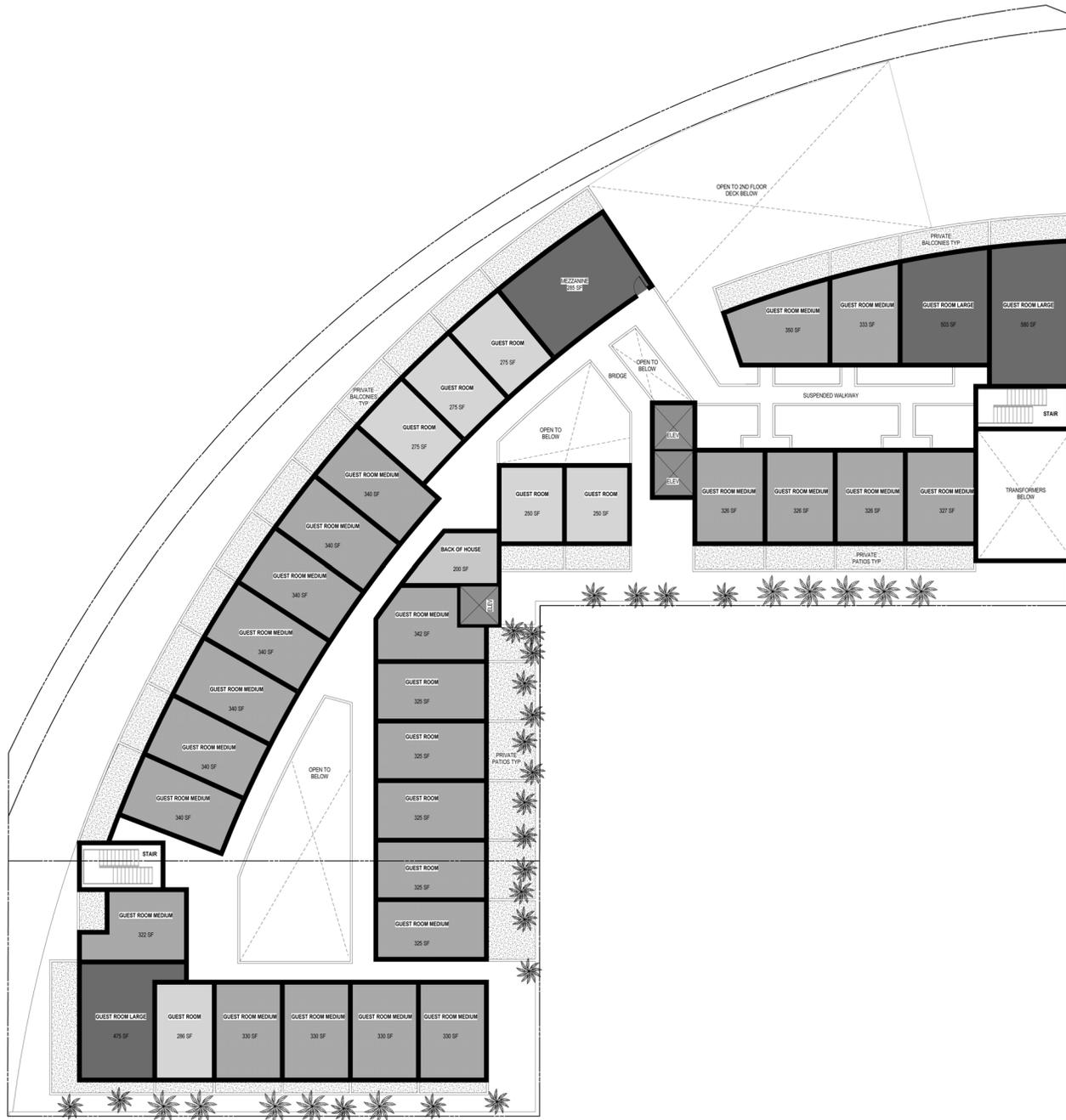


Source: KFA, 2015.



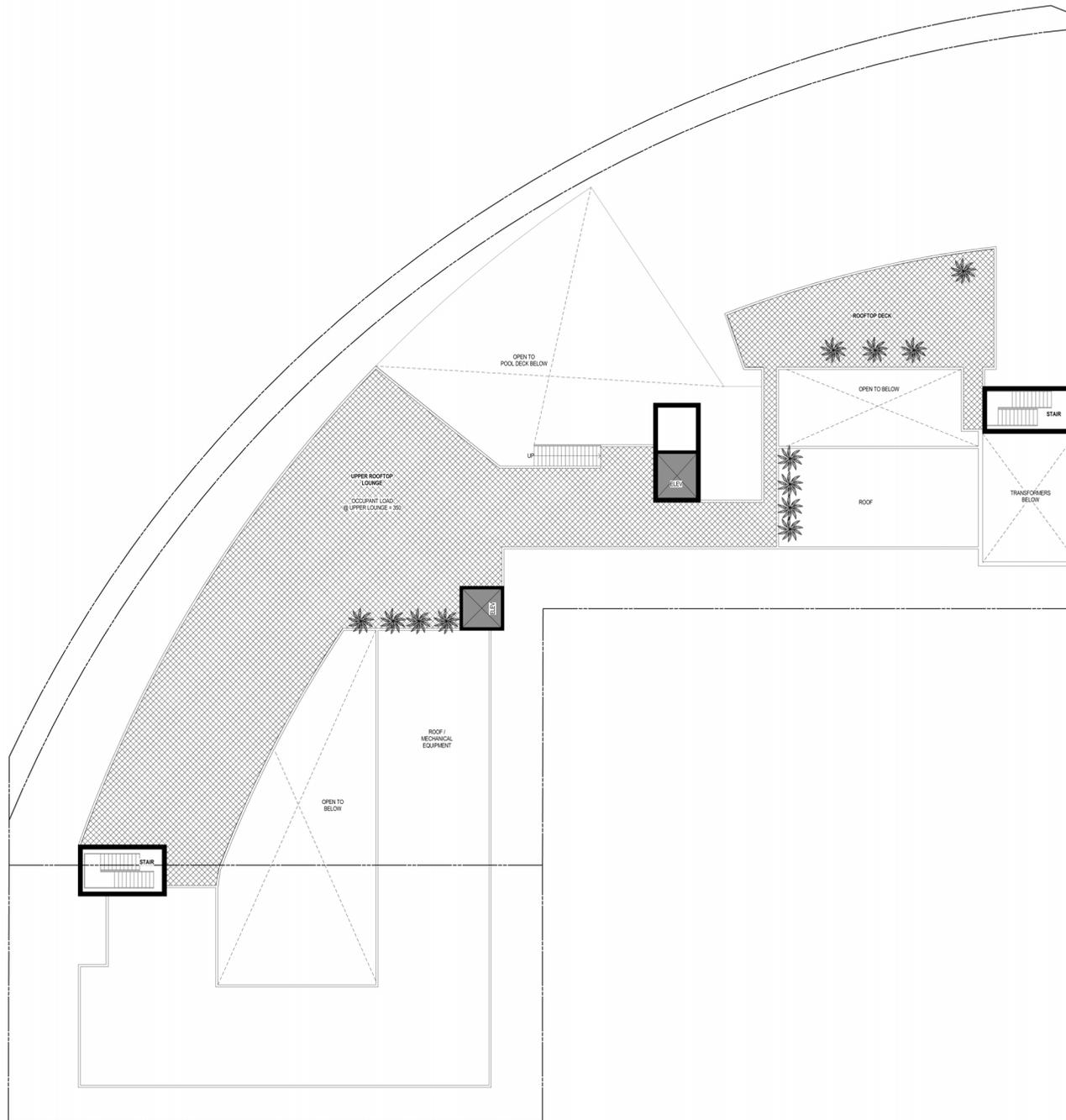


Source: KFA, 2016.



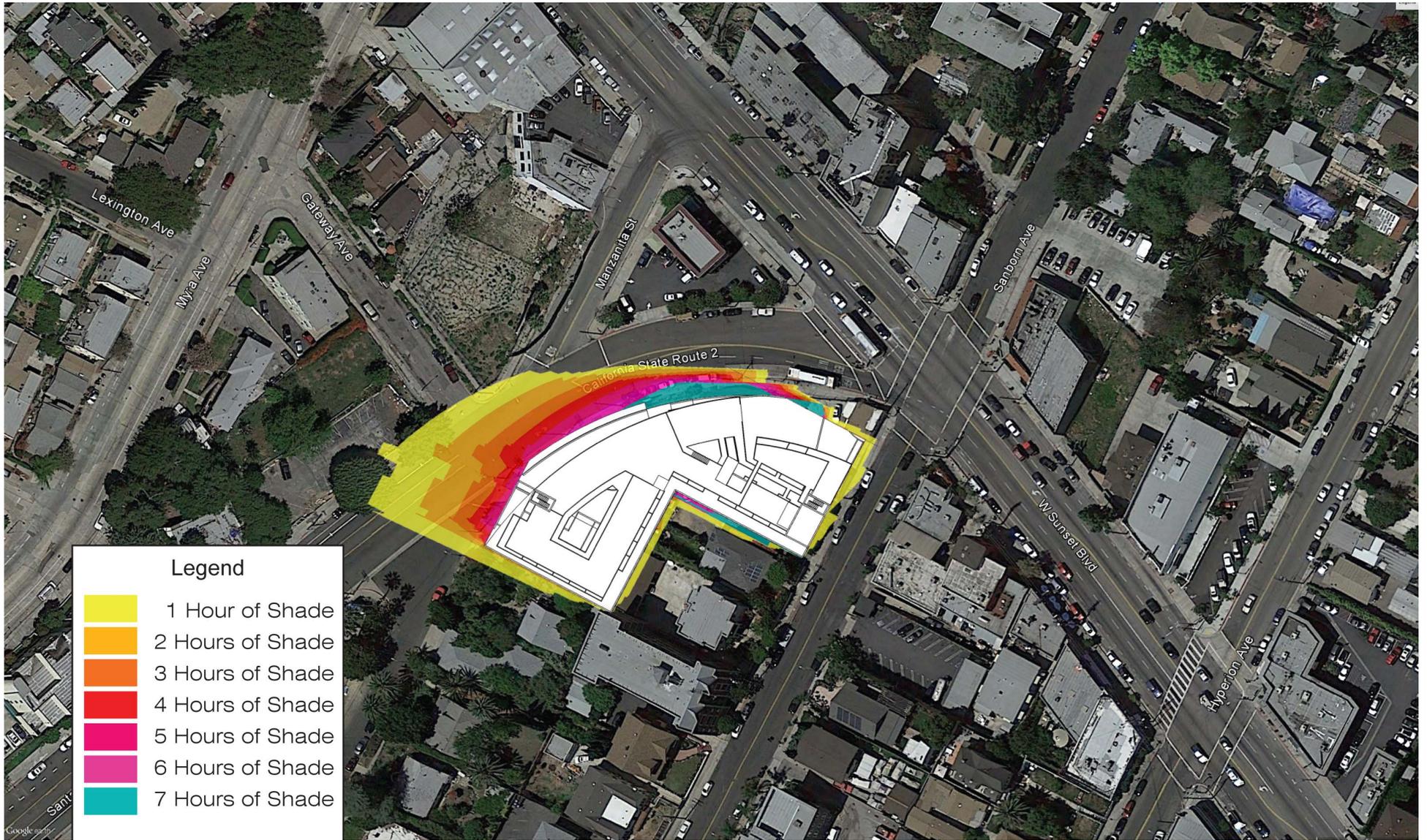
Source: KFA, 2016.





Source: KFA, 2016.





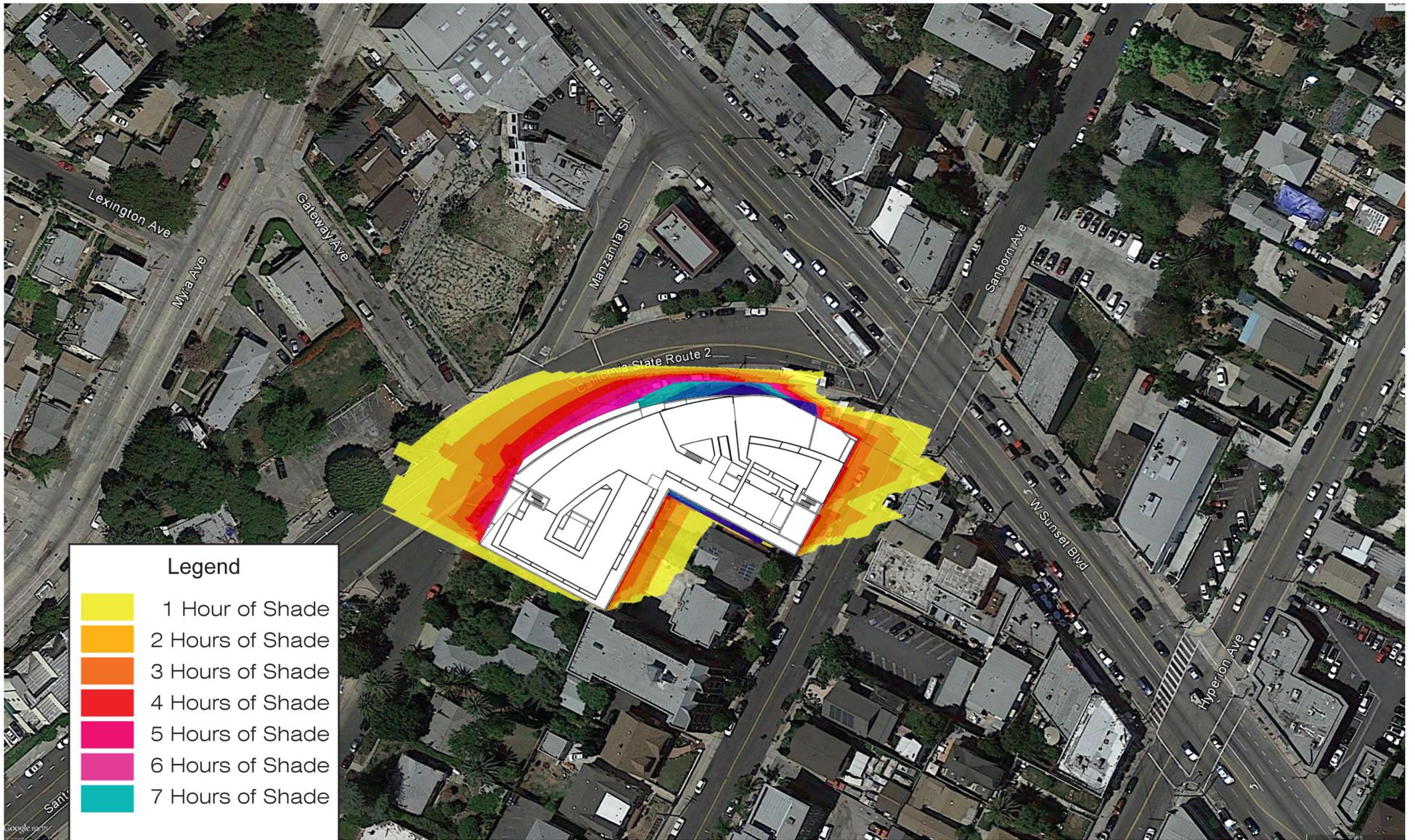
Source: Scott A. Johnson Architectural Simulation, 2016.





Source: Scott A. Johnson Architectural Simulation, 2016.



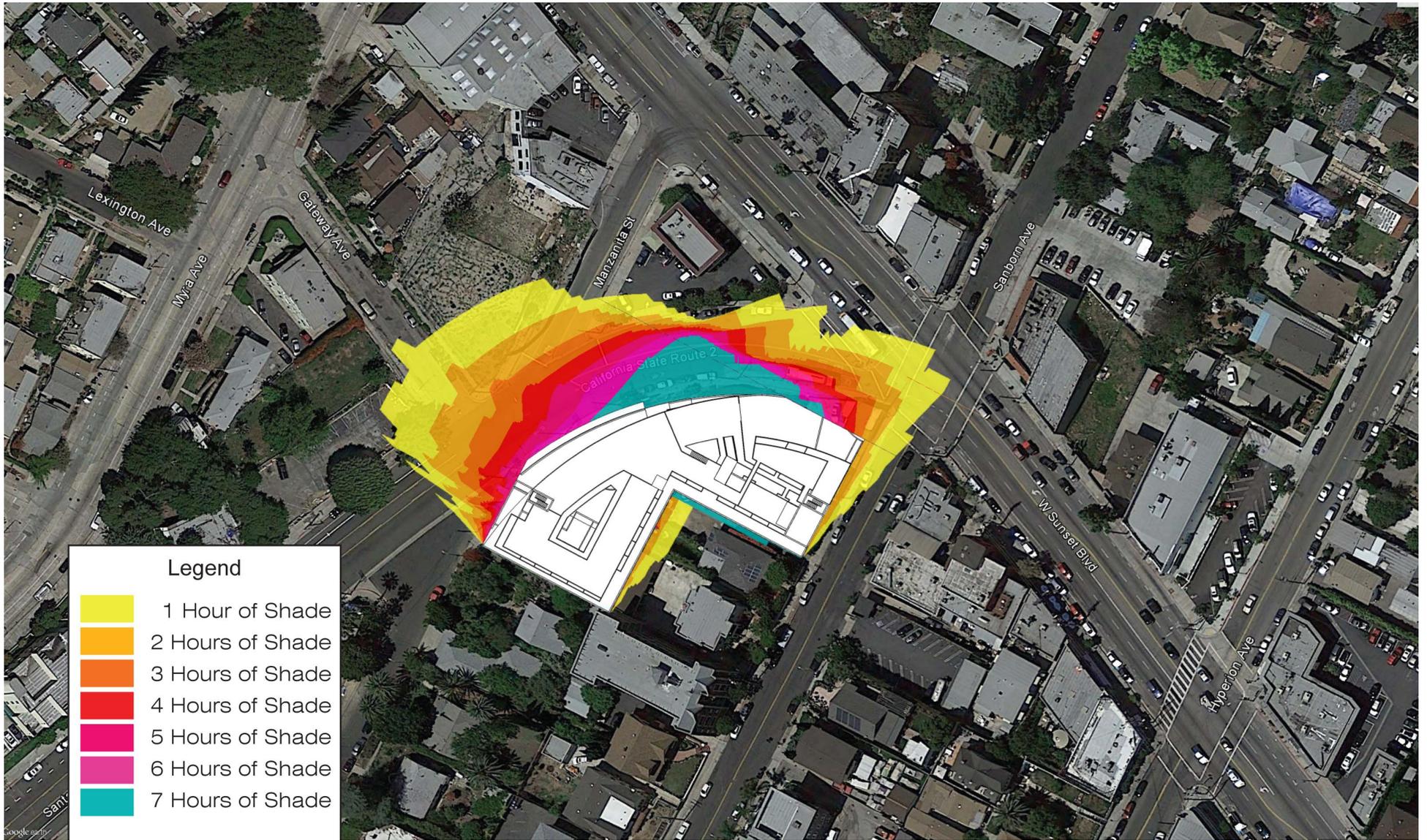


Legend

- 1 Hour of Shade
- 2 Hours of Shade
- 3 Hours of Shade
- 4 Hours of Shade
- 5 Hours of Shade
- 6 Hours of Shade
- 7 Hours of Shade

Source: Scott A. Johnson Architectural Simulation, 2016.





Source: Scott A. Johnson Architectural Simulation, 2016.



Air Quality

Construction

Regional and localized construction related impacts under the Project were found to be less than significant, with implementation of Mitigation Measures C-1 through C-19. Under Alternative 4, the Project Sites would be developed with new buildings that would be of similar size as the Project. However, the building on Site 1 would be substantially reduced in size when compared to the Project building on Site 1, as Alternative 4 would include a boutique hotel on Site 1, in place of the Project's retail, restaurant, residential and office uses for Site 1. Due to the similar overall square footage included under this alternative, it is assumed that construction of this alternative would generally utilize the same construction equipment and rely on a similar construction schedule as the Project. However, Alternative 4 would require less grading than the 29,000 cubic yards of export assumed with the Proposed Project, as it would only involve one level of subterranean parking structures. As a result, fugitive dust emissions as well as combustion-related emissions from the grading phase, generally the phase with the most localized air quality impacts, would be lesser than the Proposed Project. Off-site haul-related emissions would be lower because of the reduction in soil exported from the site. Nevertheless, peak daily construction activities under this alternative would be similar but slightly less than those associated with the Project. Thus, similar to the Project, it is expected that regional construction-related daily emissions under this alternative would not exceed SCAQMD daily significance thresholds for NO_x, CO, SO_x, PM₁₀, and PM_{2.5}. However, VOC emissions would exceed thresholds and could contribute to regional ozone violations. Localized construction-related emissions would exceed NO_x, PM₁₀, and PM_{2.5} thresholds, while CO thresholds would not be exceeded. As with the Project, implementation of Mitigation Measures C-1 through C-19 would reduce all regional and local air quality impacts below SCAQMD thresholds of significance. Therefore, the daily air quality impacts associated with the construction of Alternative 4 would be less than significant and essentially equivalent to the Project.

Operation

Regional and localized operational impacts were found to be less than significant for the Project. Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the Project Sites after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices, and the operation of landscape maintenance equipment; mobile emissions would be generated by the motor vehicles traveling to and from the Project Sites. The Project would generate 2,947 daily trips, and Alternative 4 would generate 3,022 daily trips, which is a very slight increase in daily trips when compared to the Project. Operational air quality impacts under this alternative are expected to be less than significant for both regional and localized impacts, and comparable to the Project's less than significant impacts.

Cultural Resources

Under Alternative 4, the existing structures would be demolished. However, there are no historic resources located on any of the Project Sites. As such, like the Project, Alternative 4 would result in no

impact with respect to historic resources. Since Alternative 4 would result in the construction of a project of similar square footage as the Project, the entirety of the three Project Sites would be graded for both the Project and this alternative. Therefore, this alternative would result in a similar potential to encounter archaeological or paleontological resources when compared to the Project. Alternative 4 would implement the same mitigation measures as the Project. Therefore, impacts would be less than significant, and would be similar to the Project's less than significant impacts.

Geology and Soils

Alternative 4 would be located on the same Project Sites as the Project, although with the inclusion of one additional parcel for Site 1, which are located in the seismically active region of Southern California. The impacts with respect to seismic hazards, fault rupture, ground shaking, liquefaction, and landslides would be similar to the Project. The same mitigation measures that would be implemented with the Project would also be implemented under this alternative. Impacts under Alternative 4 associated with seismic hazards would be similar to the Project's less than significant impacts.

Grading activities would be reduced when compared to the Project as Alternative 4 would only include one level of subterranean parking instead of the two levels required for the Project. Minor erosion and siltation could occur during construction similar to the Project's less than significant impacts. Like the Project, all Site grading and Site preparation would comply with applicable provisions of the 2014 Building Code and the 2013 California Building Code for development. Impacts of this alternative for soil erosion would be similar to the Project's less than significant impacts. Overall, the geology and soils impacts under Alternative 4 would be similar to the Project's less than significant impacts.

Greenhouse Gases

As discussed above, Alternative 4 would result in a similar amount of overall square footage compared to the Project (but reduced at Site 1), and a very slight increase in total daily trips when compared to the Project. Accordingly, overall operational GHG emissions generated under this alternative would be comparable to the Project. In addition, like the Project, Alternative 4 would institute Statewide measures from the AB 32 Scoping Plan, including the Pavley regulations that reduce 19.8 percent of GHG emissions from new vehicles. Like the Project, when compared to a No Action Taken scenario, implementation of Alternative 4 would reduce GHG emissions above the 15.8 percent threshold in the 2014 revisions to the AB 32 Scoping Plan. This alternative would also include similar energy efficient design features as the Project, and these features would be generally consistent with the applicable state and local plans at reducing GHG emissions. Furthermore, this alternative would also not hinder attainment of the State's goals of reducing GHG emissions by 2020 and 2050. Ultimately, Alternative 4 would be consistent with policies at the State (e.g., AB 32 Scoping Plan), regional (SCAG RTP/SCS, SCAQMD draft Efficiency Target), and local (e.g., City Green Building Ordinance) levels. As a result, impacts with respect to GHG emissions under Alternative 4 would be less than significant, and comparable to the Project.

Hazards and Hazardous Materials

Under Alternative 4, the existing structures would be demolished. As discussed in Section IV.G, Hazards and Hazardous Materials, of this Draft EIR, the mitigation measures that would be implemented for the Project would address potential impacts associated with the release of hazardous materials during construction activities. In addition, the replacement of Site 1's residential, retail, office and restaurant uses with hotel uses would not result in increased use of hazardous materials during operation. Because development under this alternative would occur on the same Project Sites, with the exception of one additional parcel for Site 1, and the same mitigation measures would be implemented, the impacts associated with hazards and hazardous materials under this alternative would be less than significant, and would be similar to the Project's less than significant impacts.

Land Use and Planning

This alternative would require the same discretionary actions as the Project for Sites 2 and 3, as the same uses and development intensity are proposed. However, this alternative would replace Site 1's retail, restaurant, office and residential uses with a hotel contained in a substantially smaller building than the Project proposes for Site 1. Based on the reduced size of the hotel building (at four stories with a maximum height of 57 feet⁴), this Alternative would not require discretionary actions that deviate from the underlying zoning's development limitations to the same degree as the proposed Site 1 mixed use Project (proposed at five stories and 68-feet). The hotel building at Site 1 would require the following discretionary approvals: (1) a Conditional Use Permit (required for a hotel use within 500 feet of residentially zoned property); (2) Commercial Corner Conditional Use Permit to allow tandem parking for commercial uses, (3) Commercial Use Permit to allow on-site alcohol sales, (4) a Zoning Administrator Adjustment to reduce the required yards, (5) Site Plan Review (6) a modification/waiver to the required dedication along Santa Monica Boulevard. However, these approvals would result in significantly reduced development intensity at Site 1 as compared to the mixed-use project. Namely, the Site 1 hotel alternative includes only 55,155 square feet of total floor area (consistent with the underlying C2-1VL 1.5 to 1 FAR limit) and does not require any discretionary approval (or SB 1818 incentive) to increase the building's square footage. The hotel alternative's entitlements would permit only a four story building that complies with the underlying 57-foot height limit⁵ as opposed to the five story, 68-foot mixed-use building (permitted through a SB 1818 density bonus incentive/waiver).

⁴ As measured from the lowest point on grade, five feet from the building.

⁵ The Site 1 C2-1VL zone generally restricts a hotel development with ground floor commercial uses that are open to the public to 3 stories and 45-feet in height. LAMC Section 12.21B.2 allows an additional 12-feet in height (up to 57-feet) because Site 1 includes a slope that is greater than 20-feet. However, no portion of the building may exceed 45-feet as measured from the highest point of the parapet wall to the elevation of the ground surface vertically below that point of measurement (the "Parallel Plane Projection"). The hotel alternative at Site 1 is designed to comply with the maximum height limit of 57-feet as measured from the lowest point at grade within five feet from the building (i.e., 45-foot C2-1VL height limit + 12-foot bonus for sloped site = 57-foot height limit). However, the hotel alternative would require the following minor height deviations

Similar to the Project, this alternative would not physically divide an established community. Overall, this alternative would result in a less than significant impact with respect to land use and planning, with impacts that are reduced when compared to the Project's less than significant impacts.

Noise

Construction

Construction-related noise impacts were found to be significant and unavoidable for the Project. Demolition and construction activities under Alternative 4 would be substantially similar to the Project due to the similar square footage proposed. Construction of this alternative would require the use of heavy equipment for demolition, excavation for subterranean parking, site grading, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of development, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity. Unlike the Project, there would only be one level of subterranean garage structures, resulting in less grading than the 29,000 cubic yards of soil exported from the Proposed Project. This would reduce the duration of construction noise from off-road equipment during excavation and grading, resulting in a shorter construction period that would represent a reduction in overall noise impacts to adjacent receptors, though the peak noise levels associated with the operation of equipment would be comparable to the Project. Similar to the Project, there would still be ambient noise increases over 5 dBA for more than 10 days in a three-month period, as well as an increase of 10 dBA at some of the sensitive receptors for at least one day. As such, these impacts would be considered potentially significant for this alternative. Like the Project, while mitigation measures would be implemented to ensure that this alternative's impacts would be reduced to the maximum extent feasible, construction-related noise impacts for Alternative 4 would be considered significant and unavoidable but reduced when compared to the Project based on the shorter duration of construction.

Construction-related groundborne vibration impacts were found to be significant and unavoidable for the Project. As discussed above, the maximum daily construction activities under this alternative would be substantially similar to the Project. Thus, similar to the Project, the nearest sensitive receptors would be approximately 5 feet from occasional heavy equipment activity and could experience vibration levels that exceed thresholds with respect to building damage and human annoyance. Like the Project, while mitigation measures would be implemented to ensure that this alternative's impacts would be reduced to the maximum extent feasible, construction-related groundborne vibration impacts for Alternative 4 would be considered significant and unavoidable but reduced when compared to the Project based on the shorter duration of construction.

through the Conditional Use Permit process (as permitted by LAMC Section 12.24F): (1) allow a fourth story (within the overall 57-foot height limit) for a mixed use building (i.e., hotel guest rooms above ground floor restaurant uses) and (2) an increase in the allowable Parallel Plane Projection from 45-feet to a maximum of 51-feet for portions of the building.

Operation

Operational noise impacts were found to be less than significant for the Project. With respect to traffic and vehicular noise, Alternative 4 would result in approximately 3,022 new daily trips, or 75 more daily trips than the Project. Thus, impacts with respect to roadway noise levels would be substantially similar to the Project. As such, impacts related to roadway noise under Alternative 4 would be less than significant, similar to the Project.

This alternative would also include one level of subterranean parking that would generate noise from sources such as engines accelerating, doors slamming, car alarms, and people talking. Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. These noise levels under Alternative 4 would be similar to those experienced under the Project. As such, operational noise levels with respect to parking areas would be less than significant and less than the Project given the alternative would only include a single subterranean parking level.

With respect to on-site noise from building mechanical sources like HVAC systems, pumps, and other equipment, Alternative 4 would be substantially similar to the Project. This alternative would be subject to some of the same mitigation measures as the Project, which would ensure that noise from HVAC systems do not significantly impact nearby sensitive receptors.

Alternative 4 would include land uses that could produce more operational noise at Site 1 (4000 Sunset Boulevard). The Project would locate 84 residential units, along with a mix of office, retail, and indoor restaurant uses at Site 1. These uses would have largely been confined to interior spaces, with the exception of a 1,400-square-foot common roof deck at the 4th floor at the southwestern corner of the Site fronting on Santa Monica Boulevard, next to a two-story apartment building on the adjacent site. Alternative 4 would locate a 94-room hotel and restaurant and bar on Site 1. As part of Alternative 4, hotel rooms would be located on the second, third, and fourth floors along the southern property line, less than 10 feet from the property line of residences on Manzanita Avenue. However, operational noise impacts on neighboring homes would be negligible and confined to these rooms that include Title 24-compliant noise insulation. Further, any roof or mechanical equipment that could impact adjacent residences would be set back further than the proposed Upper Rooftop Lounge and would have negligible noise impacts on adjacent receptors. A proposed service driveway accessed from Manzanita Street would produce intermittent vehicle-related noise, but would not exceed LAMC noise-related limits at adjacent receptors.

The restaurant and bar facilities could have the following impacts:

- 4,000-square-foot restaurant, bar and café spaces located on the northern portion of the Site fronting Santa Monica Boulevard. These facilities would be located inside the main building at Site 1 and would not increase ambient noise levels at residential receptors across Sunset Boulevard.

- Similar to the Project, Alternative 4 would also include a ground floor outdoor patio on the northeast corner of the Site where Sunset and Santa Monica Boulevards converge. The patio area would be located off the restaurant and would generate outdoor noise as late as 10 p.m. Casual dining at this outdoor patio would not substantially increase ambient noise levels for residential receptors across Sunset Boulevard, given the ambient late night noise level of 69.5 dBA L_{eq} .⁶
- A bar and restroom facility on the 4th floor would support an adjacent lower roof-top lounge and pool area that would accommodate up to 100 persons. Activities on the lower roof-top lounge would generate noise from socializing along with ambient music amplified through speakers during both the day and night hours past 10 p.m. Empirical evidence suggests a wide variation of noise levels from outdoor lounge facilities that will be influenced by a variety of factors, including the orientation of seating and the orientation of outdoor amplified speakers. For purposes of this analysis, a reference sound exposure level of 65 dBA at 75 feet was assumed.⁷ Adjacent residences to the south and east of the Project Site would be shielded from direct line-of-sight noise impacts by the hotel guest rooms on the 4th floor. Noise levels for residences across Sunset Boulevard would not be attenuated by rooftop hotel rooms and could be exposed to indirect noise from the 4th floor activities. However, any sound path would be attenuated by the distance to adjacent receptors across Sunset Boulevard, a 3'6" wall buffering all sides of the fourth floor lounge, and the proposed lower lounge's substantial height differential to second floor apartments on Sunset Boulevard. As a result, ambient noise levels at residences north of Sunset Boulevard would increase 0.1 dBA, an inaudible change in the noise environment for those residences.
- An upper rooftop lounge on the roof would accommodate up to 350 persons. Activities would generate noise from socializing and ambient music amplified through speakers during both the day and night hours. These activities would occur on the roof, where adjacent residences across Sunset Boulevard, on Manzanita Street and Sanborn Avenue could be indirectly exposed to noise past 10 p.m. Noise would be attenuated by the substantial height differential between the upper rooftop lounge and adjacent receptors combined with a setback of the roof deck, distance to adjacent receptors on Sunset Boulevard and Sanborn Avenue from the deck that is set back from the edges of the roof, and a 3'6" wall buffering all sides of the fourth floor that would attenuate any direct line-of-sight. Noise impacts to adjacent residences on Manzanita Street would be lower than the Proposed Project, as the rooftop lounge would be set back further from the southern edge of the building, resulting in an approximate 75-foot buffer from the nearest

⁶ *Measurements taken October 14, 2015, at 2:11 AM to reflect worst-case scenario ambient noise conditions (L_{eq}).*

⁷ *A 55 dBA measurement was taken at residences 75 feet from a Marina Del Rey Cheesecake Factory's outdoor dining area with 75-100 outdoor seats after 10 p.m. Arup Acoustics, "Brentwood Project/The Park" EIR No. 98-0334-CUB(CUZ)(ZV)(DA). A 10 dBA CNEL penalty for noise after 10 p.m. was applied to ensure a conservative analysis of potential night-time impacts.*

residence on Manzanita Street. This would result in reduced noise impacts to adjacent residences on Manzanita Street, as the inclusion of another lot to the Project Site increases the distance and noise attenuation to sensitive receptors.

As shown in Table VI-17, ambient noise levels would increase up to 1.7 dBA at residences on the south of the Project Site on Sanborn Avenue, an increase considered inaudible and less than significant by the LA CEQA Thresholds Guide. Ambient noise levels would increase 0.1 dBA at the nearest residences on Manzanita Street, an increase that is considered less than significant and inaudible. Noise levels for residences north of Sunset Boulevard would not increase at all. These projected increases assume substantial attenuation of sound based on the lack of a direct sound path by virtue of the proposed upper lounge's substantial height differential to adjacent residences, the setback of any speakers from the edge of the roof, and the 3'6" parapet wall that further attenuates any sound path.

Table VI-17
Noise Levels From Outdoor Dining on Upper Rooftop Lounge

Sensitive Receptor	Distance from Site (feet)	Maximum Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Residences South of Sunset Boulevard/Santa Monica Boulevard on Manzanita Street	75	41.0	57.9	58.0	0.1
Residences North of Sunset Boulevard on Sanborn Avenue	100	38.5	69.5	69.5	0.0
Residences South of Sunset Boulevard on Sanborn Avenue	20	52.5	55.7	57.4	1.7

SOURCE: DKA Planning, 2015. Ambient noise levels measured Measurements taken October 14, 2015, at 2:11 AM to reflect worst-case scenario ambient noise conditions.

Projected noise increases at all three nearby receptors are not expected to be audible, would not represent a violation of the City's noise ordinance, or be considered a significant impact on ambient noise levels. Nevertheless, there is some potential for occasional annoyance during the evening hours. As such, implementation of the following mitigation measures are recommended to further minimize any potential noise impacts and any potential nuisance.

Mitigation Measures

J-18 Any amplified speakers on the lower and upper rooftop lounges shall be oriented away from adjacent residences on Sanborn Avenue and Manzanita Street and positioned lower than the parapets on the 4th floor and roof and oriented downward toward the floor. Any amplified speakers shall be set back as far from adjacent residences on Sanborn Avenue and Manzanita Street as much as possible.

- J-19** Any amplification shall utilize as many smaller speakers as is practical to diffuse the source strength of individual speakers that could impact receivers and sensitive receptors at the end of a specific sound path.
- J-20** Acoustic glazing, wall, and roof construction treatments should consider acoustic considerations in the construction process. Any gaps, joints, and service penetrations in the 3'6" high parapet walls should be acoustically mitigated during the construction process.

With implementation of Mitigation Measures J-18 through J-20, on-site operational noise impacts would be less than significant under this Alternative and essentially equivalent to the Project.

Population and Housing

Under Alternative 4, the Project Sites would be developed with the Project buildings on Sites 2 and 3, and a hotel on Site 1. As such, Alternative 4 would result in reduced population generation and greater employment generation when compared to the Project. It is likely that there are unemployed workers in the Project area who could fill the jobs generated by this alternative. The removal of four occupied housing units would not substantially displace a number of existing housing or people and would not induce growth in an area. However, the additional C2 lot that would be part of the hotel alternative contains 3 units that are subject to the City's Rent Stabilization Ordinance the ("RSO"). This results in a total of 7 RSO units across the three Project sites under Alternative 4. These units are subject to annual rent increase limits, but are not restricted to any particular income eligibility level. Moreover, the units are subject to vacancy "de-control", which allows rents to escalate to market rates upon tenant vacancy. Although housing would no longer be provided on Site 1, Alternative 4 would still include 18 total deed-restricted Very Low Income units (8 VLI units on Site 2 and 10 VLI units on Site 3). The rents of these Very Low Income affordable units are not subject to "vacancy decontrol" and instead must maintain restricted rent levels for a 55-year period. Thus, by replacing 7 RSO units (3 of which are on the additional Site 1 Hotel alternative) with 18 total deed restricted Very Low Income units, the Project would increase the amount of affordable housing as compared with existing conditions. In addition, prior to demolition of the existing residential buildings, in compliance with the RSO, the landlord(s) of the buildings would be required to file a Landlord Declaration of Intent to Evict with the Los Angeles Housing and Community Investment Department and payment of relocation assistance for the current residents at the Project Site. Through compliance with these regulations, Alternative 4 would not displace any residents, necessitating the construction of replacement housing elsewhere. Therefore, impacts would be similar to the Project and would be less than significant.

Public Services

Fire Protection

Alternative 4 would consist of a project of similar square footage as the Project. However, this alternative would replace Site 1's retail, restaurant, office and residential uses with a hotel. As discussed in Section IV.L.1 of this Draft EIR, the Project would not result in the need for a new or physically altered

governmental facility, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, and other performance objectives of the LAFD. As this alternative would consist of similar overall square footage as the Project, the expected demands of the LAFD by Alternative 4 would be similar to the demands of the Project. As such, the LAFD could accommodate this alternative without construction of a new facility. Alternative 4's impacts with respect to fire protection would be less than significant and similar to the Project's less than significant impacts.

Police Protection

Alternative 4 would consist of a project of similar square footage as the Project. However, this alternative would replace Site 1's retail, restaurant, office and residential uses with a hotel. As discussed in Section IV.L.2 of this Draft EIR, the Project would not significantly impact police services. As Alternative 4 proposes buildings of roughly similar size as the Project, the expected demands of the LAPD by Alternative 4 would be similar to the demands of the Project. As such, the LAPD could accommodate this alternative without construction of a new facility. Overall, Alternative 4's impacts with respect to police protection would be less than significant and similar to the Project's less than significant impacts.

Schools

Under Alternative 4, the Project Sites would be developed with the Project buildings on Sites 2 and 3, and a hotel on Site 1. As such, Alternative 4 would result in reduced population and student generation when compared to the Project. While Alternative 4 would generate fewer students than the Project, the surrounding schools (specifically Lexington and Lockwood Elementary Schools) may not have capacity to serve the students generated by Alternative 4. In addition, like the Project, Alternative 4 would be required to pay school facilities fees pursuant to SB 50. As such, Alternative 4 would result in a less than significant impact with respect to schools, which would be less than the Project's less than significant impact.

Parks

Under Alternative 4, the Project Sites would be developed with the Project buildings on Sites 2 and 3, and a hotel on Site 1. As such, Alternative 4 would result in a reduced population, which would result in less demand for less neighborhood and community park area when compared to the Project. Like the Project, the demand for new parks and recreational facilities would not constitute a potentially significant impact because Alternative 4 would include features that would otherwise reduce or offset additional demand for recreation and park services. In addition, Alternative 4 would comply with the dwelling unit construction tax imposed by LAMC Section 21.10.3. As such, Alternative 4 would result in a less than significant impact with respect to parks and recreational facilities, and impacts would be less than the Project's less than significant impacts.

Libraries

Under Alternative 4, the Project Sites would be developed with the Project buildings on Sites 2 and 3, and a hotel on Site 1. As such, Alternative 4 would result in a reduced population, which would result in less demand for less library facilities when compared to the Project. As described in Section IV.L.5 of this Draft EIR, the Cahuenga Branch of the LAPL would be able to accommodate the population increase generated by the Project. The total onsite population under Alternative 4 would be less than the total onsite population for the Project and therefore, the Cahuenga Branch of the LAPL could accommodate this alternative without construction of a new facility. Overall, Alternative 4 would result in a less than significant impact with respect to libraries, and impacts would be less than the Project's less than significant impacts.

Transportation and Traffic

Alternative 4 would consist of a project of similar square footage as the Project. However, this alternative would replace Site 1's residential, office, retail, and restaurant uses with a boutique hotel. As shown in Table VI-18, Alternative 4 would generate 3,022 total daily trips, including 233 AM peak hour trips and 247 PM peak hour trips, which is an increase of 75 daily trips, a decrease of twelve AM peak hour trips, and a decrease of four PM peak hour trips when compared to the Project. As traffic impacts are based on peak hour (as opposed to daily) trips, Alternative 4 would slightly reduce intersection impacts as compared to the Project. However, as shown in Tables VI-19 and VI-20, Alternative 4 would result in the same significant and unavoidable impact at the Hoover Street/Fountain Avenue/Sunset Boulevard intersection during the Existing with Project scenario and in the Future (2018) with Project scenario.

Table VI-18
Alternative 4 – Trip Generation

Weekday Trip Generation – Site 1											
Land Use	Size	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate ¹	Total	Rate ¹	Total	In	Out	Rate ¹	Total	In	Out
High-Turnover Restaurant	4.00 ksf	127.15	509	10.81	43	22	21	9.85	39	23	16
Transit Credit		-15%	-76	-15%	-6	-3	-3	-15%	-5	-3	-2
Pass-by Trips		-20%	-87	-20%	-8	-4	-4	-20%	-7	-4	-3
Net Trips			346		29	15	14		27	16	11
Hotel	94 rooms	8.17	768	0.53	49	29	20	0.60	57	29	28
Transit Credit		-15%	-115	-15%	-7	-4	-3	-15%	-8	-4	-4
Net Trips			653		42	25	17		49	25	24
Total Net Trips			999		71	40	31		76	41	35
Internal Trips			-56		-4	-2	-2		-8	-4	-4
Total External Trips			943		67	38	29		68	37	31
Weekday Trip Generation – Site 2											
Land Use	Size (ksf/du)	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate ¹	Total	Rate ¹	Total	In	Out	Rate ¹	Total	In	Out
High-Turnover Restaurant	10.0 ksf	127.15	1,272	10.81	108	56	52	9.85	98	58	40
Transit Credit		-15%	-191	-15%	-16	-8	-8	-15%	-15	-9	-6
Pass-by Trips		-20%	-216	-20%	-19	-10	-9	-20%	-17	-10	-7
Net Trips			865		73	38	35		66	39	27
Residential Apartment	91 du	6.65	605	0.51	46	9	37	0.62	56	37	19
Transit Credit		-15%	-91	-15%	-7	-1	-6	-15%	-8	-6	-3
Net Trips			514		39	8	31		47	31	16
Total Net Trips			1,379		112	46	66		113	70	43
Internal Trips			-146		-16	-8	-8		-12	-6	-6
Total External Trips			1,233		96	38	58		101	64	37
Weekday Trip Generation – Site 3											
Land Use	Size	Daily Trips		AM Peak-Hour Trips				PM Peak-Hour Trips			
		Rate ¹	Total	Rate ¹	Total	In	Out	Rate ¹	Total	In	Out
Fitness Club	4.50 ksf	32.93	148	1.43	7	3	4	3.53	16	9	7
Transit Credit		-15%	-22	-15%	-1	0	-1	-15%	-2	-1	-1
Net Trips			126		6	3	3		14	8	6
High-Turnover Restaurant	1.00 ksf	127.15	127	10.81	11	5	6	9.85	10	4	6
Transit Credit		-15%	-19	-15%	-2	-1	-1	-15%	-2	-1	-1
Pass-by Trips		-20%	-22	-20%	-2	-1	-1	-20%	-2	-1	-1
Net Trips			86		7	3	4		6	2	4
Residential Apartment	122 du	6.65	811	0.51	62	12	50	0.62	75	49	26
Transit Credit		-15%	--122	-15%	-9	-2	-7	-15%	-11	-7	-4

Net Trips		689		53	10	43		64	42	22
Total Net Trips		901		66	16	50		84	52	32
Internal Trips		-55		-4	-2	-2		-6	-3	-3
Total External Trips		846		62	14	48		78	49	29

Note: ksf = thousand square feet du = dwelling unit

¹Trip rates are based on 1,000 square feet for retail and per dwelling units for residential.

**Table VI-19
Intersection LOS – Existing Plus Alternative 4**

No.	Intersection	Peak Hour	Existing		Existing Plus Alt 4		Change in V/C	Impact?
			V/C	LOS	V/C	LOS		
1	Vermont / Sunset	AM	0.696	B	0.701	C	0.005	No
		PM	0.870	D	0.874	D	0.004	No
2	Vermont / Fountain	AM	0.611	B	0.621	B	0.010	No
		PM	0.633	B	0.640	B	0.007	No
3	Hoover / Fountain / Sunset	AM	0.910	E	0.926	E	0.016	Yes
		PM	0.856	D	0.867	D	0.011	No
4	Hyperion / Fountain	AM	0.669	B	0.678	B	0.009	No
		PM	0.696	B	0.713	C	0.017	No
5	Bates / Sunset	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					
6	Manzanita / Sunset	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					
7	Sanborn / Santa Monica / Sunset	AM	0.569	A	0.605	B	0.036	No
		PM	0.521	A	0.546	A	0.025	No
8	Hyperion / Sunset	AM	0.599	A	0.611	B	0.012	No
		PM	0.637	B	0.646	B	0.009	No
9	Lucile / Sunset	AM	0.730	C	0.742	C	0.012	No
		PM	0.675	B	0.684	B	0.009	No
10	Hoover / Santa Monica	AM	0.658	B	0.676	B	0.018	No
		PM	0.677	B	0.693	B	0.016	No
11	Manzanita / Gateway / Santa Monica	AM	Intersection Not Evaluated					
		PM	Intersection Not Evaluated					

v/c = volume/capacity
Source: AECOM, September 2015.

**Table VI-20
Intersection LOS – 2018 With Alternative 4**

No.	Intersection	Peak Hour	Without Alt 4		With Alt 4		Change in V/C	Impact?
			V/C	LOS	V/C	LOS		
1	Vermont / Sunset	AM	0.721	C	0.726	C	0.005	No
		PM	0.902	E	0.908	E	0.006	No
2	Vermont / Fountain	AM	0.618	B	0.628	B	0.010	No
		PM	0.648	B	0.655	B	0.007	No
3	Hoover / Fountain / Sunset	AM	0.932	E	0.947	E	0.015	Yes
		PM	0.880	D	0.891	D	0.011	No
4	Hyperion / Fountain	AM	0.674	B	0.684	B	0.010	No
		PM	0.704	C	0.721	C	0.017	No
5	Bates / Sunset	AM	Intersection Not Evaluated					
		PM						
6	Manzanita / Sunset	AM	Intersection Not Evaluated					
		PM						
7	Sanborn / Santa Monica / Sunset	AM	0.588	A	0.624	B	0.036	No
		PM	0.532	A	0.568	A	0.036	No
8	Hyperion / Sunset	AM	0.613	B	0.625	B	0.012	No
		PM	0.651	B	0.660	B	0.009	No
9	Lucile / Sunset	AM	0.749	C	0.761	C	0.012	No
		PM	0.692	B	0.701	C	0.009	No
10	Hoover / Santa Monica	AM	0.680	B	0.699	B	0.019	No
		PM	0.706	C	0.723	C	0.017	No
11	Manzanita / Gateway / Santa Monica	AM	Intersection Not Evaluated					
		PM						

*v/c = volume/capacity.
Source: AECOM, September 2015.*

Utilities

Water

Under Alternative 4, the Project Sites would be developed with similar overall square footage as the Project. However, this alternative would replace Site 1's retail, restaurant, office and residential uses with a boutique hotel. The Project would result in the demand for approximately 43,000 gpd of water (see Section IV.N.1, Water). Alternative 4 would result in the demand for approximately 39,614 gpd of water (see Table VI-21), which is a decrease of 3,386 gallons per day when compared to the Project. As the LADWP has stated it could accommodate the Project, it would also be able to accommodate this alternative. Overall, Alternative 4 would result in a similar less than significant impact with respect to water, with a decrease when compared to the Project's less than significant impact.

**Table VI-21
Alternative 4 Water Demand**

Land Use	Size	Demand Rate (gpd)	Total Water (gpd)
Site 1			
Existing (Removed)			
Residential (SFD 9-bedroom)	1 DU	590 gallons / DU	(590)
Office	1,279 sf	153.6 gallons / 1,000 sf	(197)
Warehouse	3,771 sf	38.4 gallons / 1,000 sf	(145)
Proposed			
Hotel	94 rooms	130 gallons / room	12,220
Restaurant	4,000 sf	384 / 1,000 sf	1,536
Total Site 1 (Proposed – Existing)			12,824
Site 2			
Existing (Removed)			
Commercial	7,400 sf	64 gallons / 1,000 sf	(474)
Proposed			
Residential (Studio)	3 DU	88.5 gallons / DU	266
Residential (1 bedroom)	79 DU	130 gallons / DU	10,270
Residential (2 bedrooms)	9 DU	177gallons / DU	1,593
Retail	10,000 sf	32 / 1,000 sf	320
Total Site 2 (Proposed – Existing)			11,975
Site 3			
Existing (Removed)			
Residential (SFD 2-bedroom)	1 DU	177 gallons / DU	(177)
Residential (Duplex 2-bedroom)	1 DU	177 gallons / DU	(177)
Proposed			
Residential (Loft)	18 DU	88.5 gallons / DU	1,593
Residential (Studio)	47 DU	88.5 gallons / DU	4,160
Residential (1 bedroom)	47 DU	130 gallons / DU	6,110
Residential (2 bedrooms)	10 DU	177 gallons / DU	1,770
Fitness Center	4,500 sf	256 gallons / 1,000 sf	1,152
Restaurant	999 sf	384 gallons/ 1,000 sf	384
Total Site 3 (Proposed – Existing)			14,815
Total All Sites (Proposed – Existing)			39,614
<i>DU=dwelling unit; sf =square feet; gpd = gallons per day</i>			
<i>Source (rates): Water use based on correspondence from Ali Poosti, Division Manager, Wastewater Engineering</i>			

**Table VI-21
Alternative 4 Water Demand**

Land Use	Size	Demand Rate (gpd)	Total Water (gpd)
<i>Services Division, Bureau of Sanitation, October 2, 2014 and City of Los Angeles CEQA Thresholds Guide, 2006, Exhibit M.2-12 Sewage Generation Factors. Water consumption rates are assumed as 128 percent (nonresidential) and 118 percent (residential) of the wastewater generation rates.</i>			

Wastewater

Under Alternative 4, the Project Sites would be developed with similar square footage as the Project. However, this alternative would replace Site 1's retail, restaurant, office and residential uses with a boutique hotel. The Project would result in an increase of wastewater generation of approximately 35,995 gpd (see Section IV.N.2, Wastewater). Alternative 4 would generate 33,364 gpd of wastewater (see Table VI-22), which is a decrease when compared to the Project. The Hyperion Treatment Plan would have adequate capacity to accommodate the Project, and therefore would also have adequate capacity to accommodate this alternative. Overall, Alternative 4 would result in a similar less than significant impact with respect to wastewater, with a decrease when compared to the Project's less than significant impact.

**Table VI-22
Alternative 4 Wastewater Generation**

Land Use	Size	Generation Rate (gpd)	Total Wastewater (gpd)
Site 1			
Existing (Removed)			
Residential (SFD 9-bedroom)	1 DU	500 gallons / DU	(500)
Office	1,279 sf	120 gallons / 1,000 sf	(153)
Warehouse	3,771 sf	30 gallons / 1,000 sf	(113)
Proposed			
Hotel	94 rooms	110 gallons / room	10,340
Restaurant	4,000 sf	300 / 1,000 sf	1,200
Total Site 1 (Proposed – Existing)			10,774
Site 2			
Existing (Removed)			
Commercial	7,400 sf	50 gallons / 1,000 sf	(370)
Proposed			

**Table VI-22
Alternative 4 Wastewater Generation**

Land Use	Size	Generation Rate (gpd)	Total Wastewater (gpd)
Residential (Studio)	3 DU	75 gallons / DU	225
Residential (1 bedroom)	79 DU	110 gallons / DU	8,690
Residential (2 bedrooms)	9 DU	150 gallons / DU	1,350
Retail	10,000 sf	25 gallons / 1,000 sf	250
Total Site 2 (Proposed – Existing)			10,145
Site 3			
Existing (Removed)			
Residential (SFD 2-bedroom)	1 DU	150 gallons / DU	(150)
Residential (Duplex 2-bedroom)	1 DU	150 gallons / DU	(150)
Proposed			
Residential (Loft)	18 DU	75 gallons / DU	1,350
Residential (Studio)	47 DU	75 gallons / DU	3,525
Residential (1 bedroom)	47 DU	110 gallons / DU	5,170
Residential (2 bedroom)	10 DU	150 gallons / DU	1,500
Fitness Center	4,500 sf	200 gallons / 1,000 sf	900
Restaurant	999 sf	300 gallons/ 1,000 sf	300
Total Site 3 (Proposed – Existing)			12,445
Total All Sites (Proposed – Existing)			33,364
<i>DU=dwelling unit; sf =square feet; gpd = gallons per day</i>			
<i>Source (rates): Written Correspondence from Ali Poosti, Acting Division Manager, Wastewater Engineering Services Division, BOS, October 2, 2014.</i>			

Solid Waste

Under Alternative 4, the Project Sites would be developed with similar square footage as the Project. However, this alternative would replace Site 1's retail, restaurant, office and residential uses with a boutique hotel. The Project would result in an increase of approximately 3,783 pounds of solid waste per day during operation (see Section IV.N.3, Solid Waste). Alternative 4 would generate 3,866 lbs per day (see Table VI-23), which is a slight decrease when compared to the Project. The remaining daily intake capacity of the Sunshine Canyon City/County Landfill would have adequate capacity to accommodate the solid waste generated by both the Project and this alternative. Overall, Alternative 4 would result in a similar less than significant impact with respect to solid waste, with a slight decrease when compared to the Project's less than significant impact.

**Table VI-23
Alternative 4 Solid Waste Generation**

Land Use	Size	Generation Rate (lbs/day)	Total Solid Waste (lbs)
Site 1			
Existing (Removed)			
Residential	1 DU	12.23 pounds / DU	(12.23)
Office	1,279 sf	6 pounds / 1,000 sf	(8)
Warehouse	3,771 sf	6 pounds / 1,000 sf	(23)
Proposed			
Hotel	94 rooms	12.23 pounds / room	1,150
Restaurant	4,000 sf	5 lbs / 1,000 sf	20
Total Site 1 (Proposed – Existing)			1,127
Site 2			
Existing (Removed)			
Commercial	7,400 sf	5 pounds / 1,000 sf	(37)
Proposed			
Residential	91 DU	12.23 lbs / DU	1,113
Retail	10,000 sf	5 lbs / 1,000 sf	50
Total Site 2 (Proposed – Existing)			1,126
Site 3			
Existing (Removed)			
Residential	1 DU	12.23 pounds / DU	(12.23)
Residential	1 DU	12.23 pounds / DU	(12.23)
Proposed			
Residential	122 DU	12.23 pounds / DU	1,492
Fitness Center	4,500 sf	31.2 pounds / 1,000 sf	140
Restaurant	999 sf	5 pounds / 1,000 sf	5
Total Site 3 (Proposed – Existing)			1,613
Total All Sites (Proposed – Existing)			3,866
<i>DU=dwelling unit; sf= square feet; lbs = pounds</i>			
<i>Rates: CalRecycle Estimated Solid Waste Generation Rates:</i> http://www.calrecycle.ca.gov/wastechar/wastegenrates/ <i>Residential – 12.23 pounds/unit; source: City of Los Angeles CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles (DRAFT).</i> <i>Retail – 5 pounds/1,000 sf; source: City of LA Dept. of City Planning doc "EIR Manual for Private Projects".</i>			

Energy

Under Alternative 4, the Project Sites would be developed with similar square footage as the Project. However, this alternative would replace Site 1's retail, restaurant, office and residential uses with a hotel. The Project would result in the demand for approximately 2,377,885 kWh/year of electricity and 1,225,754 cf/month of natural gas (see Section IV.N.4, Energy). Alternative 4 would result in the demand for approximately 2,010,912 kWh/year of electricity and 1,249,066 cf/month of natural gas (see Table VI-24 and Table VI-25). Therefore, this alternative would result in a decrease in electricity demand and a slight increase in natural gas demand when compared to the Project. The LADWP and SCG plan for growth in their systems to accommodate and deliver electricity and natural gas, respectively. Overall, Alternative 4 would result in a less than significant impact with respect to energy, similar to the Project's less than significant impacts.

**Table VI-24
Alternative 4 Electricity Demand**

Land Use	Size	Demand Rate (kw-h/yr) ¹	Total Electricity (kw-h/yr)
Site 1			
Existing (Removed)			
Residential	1 DU	5,626.50 kw-h / DU	(5,626.5)
Office	1,279 sf	12.95 kw-h / sf	(16,563)
Warehouse	3,771 sf	4.35 kw-h / sf	(16,404)
Proposed			
Hotel	94 rooms	5,626.50 kw-h / room	528,891
Restaurant	4,000 sf	47.45 kw-h/sf	189,800
Total Site 1 (Proposed – Existing)			680,098
Site 2			
Existing (Removed)			
Commercial	7,400 sf	13.55 kw-h / sf	(100,270)
Proposed			
Residential	91 DU	5,626.50 kw-h/du	512,012
Retail	10,000 sf	13.55 kw-h/sf	135,500
Total Site 2 (Proposed – Existing)			547,242
Site 3			
Existing (Removed)			
Residential	1 DU	5,626.50 kw-h / DU	(5,626.50)
Residential	1 DU	5,626.50 kw-h / DU	(5,626.50)
Proposed			

**Table VI-24
Alternative 4 Electricity Demand**

Land Use	Size	Demand Rate (kw-h/yr) ¹	Total Electricity (kw-h/yr)
Residential	122 DU	5,626.50 kw-h/du	686,433
Fitness Center	4,500 sf	13.55 kw-h / sf	60,989
Restaurant	999 sf	47.45 kw-h / sf	47,403
Total Site 3 (Proposed – Existing)			783,572
Total All Sites (Proposed – Existing)			2,010,912
<i>Notes:</i>			
<i>DU = dwelling unit; sf =square feet; kW-h = kilowatt-hour; yr = year</i>			
<i>¹ Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate. The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i>			

**Table VI-25
Alternative 4 Natural Gas Demand**

Land Use	Size	Demand Rate (cf/mo) ¹	Total Natural Gas (cf/mo)
Site 1			
Existing (Removed)			
Residential	1 DU	6,665 cf / DU	(6,665)
Office	1,279 sf	2.0 cf / sf	(2.6)
Warehouse	3,771 sf	2.9 cf / sf	(11)
Proposed			
Hotel	94 rooms	4,011.5 cf / room	377,081
Restaurant	4,000 sf	2.9 cf/sf	11,600
Total Site 1 (Proposed – Existing)			382,002
Site 2			
Existing (Removed)			
Commercial	7,400 sf	2.9 cf / sf	(21,460)
Proposed			
Residential	91 DU	4,011.5 cf/DU	365,047
Retail	10,000 sf	2.9 cf/sf	29,000
Total Site 2 (Proposed – Existing)			372,587
Site 3			
Existing (Removed)			

**Table VI-25
Alternative 4 Natural Gas Demand**

Land Use	Size	Demand Rate (cf/mo)¹	Total Natural Gas (cf/mo)
Residential	1 DU	6,665 cf / DU	(6,665)
Residential	1 DU	4,011.5 cf / DU	(4,011.5)
Proposed			
Residential	122 DU	4,011.5 cf / DU	489,403
Fitness Center	4,500 sf	2.9 cf / sf	13,053
Restaurant	999 sf	2.9 cf / sf	2,897
Total Site 3 (Proposed – Existing)			494,677
Total All Sites (Proposed – Existing)			1,249,266
<i>Notes:</i> <i>sf = square feet; DU = dwelling units; cf = cubic feet; mo = month</i> <i>¹SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate</i> <i>The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.</i>			

Relationship to Project Objectives

Alternative 4 would meet all of the Project objectives overall, albeit some to a lesser degree than the Project since it would provide fewer market rate and affordable housing units (i.e., 75 fewer market rate and 9 fewer deed restricted affordable housing units). The hotel alternative, which includes ground floor restaurant and café uses, would activate and improve the pedestrian experience along the 4000 Sunset Boulevard frontage to the same or greater degree than the proposed mixed use Project at Site 1. By including a reduced size hotel at Site 1, Alternative 4 would also satisfy the objective to provide buildings appropriate to the scale, proportion, and aesthetic design of the Silver Lake community (and Sunset Junction in particular) to a greater degree than the Project.

Reduction of Significant Project Impacts

The Project would result in (i) shade/shadow (Site 2) impacts (which are conservatively being disclosed and treated as significant and unavoidable, notwithstanding SB 743, which deems shade shadow impacts in mapped “Transit Priority Areas” less than significant as a matter of law), (ii) Project-specific and cumulative construction noise and vibration impacts, and (iii) Project-specific and cumulative traffic impacts at the Hoover Street/Fountain Avenue/Sunset Boulevard intersection (Existing Plus Project and Future (2018)). Alternative 4 would result in reduced construction noise and vibration impacts as compared to the Project due to a reduced grading and construction timeline. However, construction noise and vibration impacts would for Alternative 4 would still be considered significant and unavoidable. Alternative 4 would therefore result in similar significant and unavoidable impacts as the Project.

C. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of a proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, the No Project Alternative would result in the least impacts on the existing environment. However, Section 15126.6(e)(2) of the CEQA Guidelines states if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. Based on the alternatives analysis provided above and Alternatives Comparison Table VI-26, Alternative 2 is considered to be the environmentally superior alternative. However, Alternative 2 does not meet critical Project objectives to the same degree as the Project such as providing much needed housing and activating the streetscape along Sunset Boulevard. Additionally, Alternative 2 would produce exclusively market rate units, thereby failing to satisfy the key Project objective to provide deed restricted affordable units in the Silver Lake and Hollywood Community Plan areas.

**Table VI-26
Alternatives Comparison**

Impact Area	Proposed	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Aesthetics					
Visual Resources/Views	LTS	Reduced	Reduced	Reduced	Reduced
Shade/Shadow	SIG/U	Reduced	Similar	Similar	Similar
Light and Glare	LTS	Reduced	Reduced	Reduced	Reduced
Air Quality					
Construction	LTS	Reduced	Reduced	Reduced	Reduced
Operation	LTS	Reduced	Reduced	Greater	Similar
Cultural Resources					
Historic	LTS	Reduced	Similar	Similar	Similar
Archaeological	LTS	Reduced	Similar	Similar	Similar
Paleontological	LTS	Reduced	Similar	Similar	Similar
Human Remains	LTS	Reduced	Similar	Similar	Similar
Geology and Soils					
Rupture of Known Earthquake Fault	LTS	Reduced	Similar	Similar	Similar
Strong Seismic Ground Shaking	LTS	Reduced	Similar	Similar	Similar
Ground Failure, Liquefaction	LTS	Reduced	Similar	Similar	Similar
Landslides	LTS	Reduced	Similar	Similar	Similar
Soil Erosion	LTS	Reduced	Similar	Similar	Similar
Unstable Geologic Unit	LTS	Reduced	Similar	Similar	Similar
Expansive Soils and Soil Stability	LTS	Reduced	Similar	Similar	Similar
Incapable of supporting Septic Tanks	NI	Reduced	Similar	Similar	Similar
Greenhouse Gases					
Operation	LTS	Reduced	Reduced	Greater	Similar
Hazards/Hazardous Materials					
Release of Hazardous Materials	LTS	Reduced	Similar	Similar	Similar
Within One-Quarter Mile of School	LTS	Reduced	Similar	Similar	Similar
Within Two Miles of a Public Airport	NI	Reduced	Similar	Similar	Similar
Within Vicinity of Private Airstrip	NI	Reduced	Similar	Similar	Similar
Interfere with Emergency Plan	LTS	Reduced	Similar	Similar	Similar

**Table VI-26
Alternatives Comparison**

Impact Area	Proposed	Alternative 1	Alternative 2	Alternative 3	Alternative 4
Listed on Hazardous Materials Sites	NI	Reduced	Similar	Similar	Similar
Wildland Fires	NI	Reduced	Similar	Similar	Similar
Land Use and Planning	LTS	Reduced	Reduced	Reduced	Reduced
Noise					
Construction Noise	SIG/U	Reduced	Similar	Similar	Reduced
Constriction Vibration	SIG/U	Reduced	Similar	Similar	Reduced
Operation	LTS	Reduced	Reduced	Greater	Similar
Population/Housing					
Displace Housing	LTS	Reduced	Similar	Similar	Similar
Displace People	LTS	Reduced	Similar	Similar	Similar
Induce Population into area	LTS	Reduced	Similar	Similar	Similar
Indirect Growth due to temporary jobs	LTS	Reduced	Similar	Similar	Similar
Population growth	LTS	Reduced	Similar	Similar	Similar
Public Services					
Fire	LTS	Reduced	Reduced	Similar	Similar
Police	LTS	Reduced	Reduced	Similar	Similar
Schools	LTS	Reduced	Reduced	Reduced	Reduced
Parks	LTS	Reduced	Reduced	Reduced	Reduced
Libraries	LTS	Reduced	Reduced	Reduced	Reduced
Traffic/Transportation/Parking					
Traffic Impacts (Intersections)	SIG/U	Reduced	Reduced	Greater	Similar
Utilities					
Water	LTS	Reduced	Reduced	Reduced	Similar
Wastewater	LTS	Reduced	Reduced	Reduced	Similar
Solid Waste	LTS	Reduced	Reduced	Reduced	Similar
Electricity	LTS	Reduced	Reduced	Greater	Similar
Natural Gas	LTS	Reduced	Reduced	Reduced	Similar
<i>Notes:</i>					
<i>LTS = Less Than Significant</i>					

**Table VI-26
Alternatives Comparison**

Impact Area	Proposed	Alternative 1	Alternative 2	Alternative 3	Alternative 4
<p><i>SIG/U = Significant and Unavoidable</i></p> <p><i>NI = No Impact</i></p> <p><i>Source: CAJA Environmental Services.</i></p>					

