
VI. ALTERNATIVES TO THE PROPOSED PROJECT

INTRODUCTION

As stipulated in Section 21002.1(a) of the CEQA Statutes (Public Resources Code):

*The purpose of an environmental impact report is to identify the significant effects on the environment of a project, **to identify alternatives to a project**, and to indicate the manner in which those significant effects can be mitigated or avoided. [Emphasis added]*

More specifically, the State CEQA Guidelines (Section 15126.6) require an EIR to describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. The discussion of alternatives, however, need not be exhaustive, but 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 that are deemed “infeasible.”

Section 15126.6(a) of the State 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 decisionmaking 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 State 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 State 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.

Level of Detail

The State 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 State 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 proposed project are:

- To provide an attractive and harmonious development in Century City, which takes into consideration the architectural character and the environmental setting of the area;
- To provide high-quality housing for local and area residents to meet existing and future needs of those desiring to live in Century City and to help alleviate the substantial housing shortage in the City;
- To provide for the housing, commercial, or other service needs of the current and future residents of West Los Angeles;

- To redevelop the former St. Regis Hotel property with a financially viable development;
- To redevelop the former St. Regis Hotel property in a manner that is consistent with the trip allocations and development requirements in the Century City North Specific Plan;
- To create a landmark high-rise building that complements the character of the area through appropriate scale and design;
- To create a high-quality development that promotes integrated urban living by offering residential amenities and services to complement and enhance the surrounding Century City community; and
- To provide luxury housing in close proximity to offices and retail land uses in Century City.

Overview of Selected Alternatives

As indicated above, project alternatives should feasibly be able to attain “most of the basic objectives of the project” (Section 15126.6(a) of the State CEQA Guidelines), even though implementation of the project alternatives might, to some degree, impede the attainment of those objectives or be more costly (Section 15126.6(b) of the State CEQA Guidelines). Therefore, for purposes of this alternatives analysis, and to compare the merits of an alternative’s ability to reduce environmental impacts and meet the project’s objectives, the following alternatives were defined and analyzed:

- Alternative A - No Project;
- Alternative B – Entertainment Complex;
- Alternative C – Office Building; and
- Alternative D – Reduced Density.

Alternatives Rejected as Being Infeasible

Section 15126.6(c) of the State 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. In addition to the alternatives listed above, several other alternatives were considered and rejected by the project applicant.

Alternative sites were not analyzed because the project applicant does not own or control other property within the City that satisfies the objectives for the proposed project.

An alternative that would involve the development of the project site with only retail land uses was considered and rejected because it is likely that adequate parking would not be available and excessive

traffic would result. Furthermore, ample retail opportunities already exist in close proximity to the project site at the Westfield Shoppingtown Century City Mall.

In addition, an alternative that would involve the development of the project site with a private school was considered and rejected because it did not meet any of the project objectives, and was not considered to be an economically feasible development in Century City.

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 proposed 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.

The following alternatives analysis compares the potential environmental impacts of five alternatives with those of the proposed project for each of the environmental topics analyzed in detail in Section IV (Environmental Impact Analysis) of this Draft EIR.

A. NO PROJECT ALTERNATIVE

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project (State CEQA Guidelines Section 15126.6(e)(1)). Pursuant to State CEQA Guidelines Section 15126.6(e)(2):

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the proposed project were not approved, based on current plans, and consistent with available infrastructure and community services.

Under the No Project Alternative, the proposed project would not be constructed and the former hotel would continue to occupy the project site and would be operational. The hotel includes 297 guest rooms, banquet facilities, and conference facilities. The analysis of the No Project Alternative assumes the continuation of existing conditions, as well as development of the related projects described in Section II.B (Related Projects). The potential environmental impacts associated with the No Project Alternative are described below and are compared to the potential environmental impacts associated with the proposed project.

Aesthetics

Under Alternative A, the existing hotel building would continue to occupy the project site. Thus, the shading associated with the existing building illustrated in Figures IV.B-1 and IV.B-2, would be similar to the shading that would occur under Alternative A. As shown therein, the summer solstice shadows would cast shadows onto the residences to the southwest of the project site for approximately one hour in the morning (between 9:00 A.M. and 10:00 A.M.). Therefore, summer solstice shadows would not generate any significant shadow impacts. However, the extent of the shadows under Alternative A are existing shadows and would, thus, not represent an increase in shadows when compared to existing conditions. Therefore, there would be no shadow impacts under Alternative A, and the shadow impacts would be less than those associated with the proposed project.

With respect to impacts associated with light/glare, as discussed in Section IV.B.2 (Light/Glare), the former hotel generated nighttime lighting on the project site from interior uses and security lighting on the exterior of the building and the surrounding grounds. The former hotel did not generate excessive glare, as the building siding and windows do not contain highly reflective materials. However, the light/glare that would be generated under this alternative represents a continuation of existing conditions and, therefore, would not result in a significant impact. As such, there would be no light/glare impacts under Alternative A, and the light/glare impacts would be less than those associated with the proposed project.

As the hotel is an existing structure, there would be no impacts upon visual resources, including views, and impacts on visual resources would be less than those associated with the proposed project.

Air Quality

No grading or construction would be required under Alternative A 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 trips would be generated under this alternative. However, it is anticipated that interior (and possibly some exterior) renovation of the existing building would be conducted with the implementation of Alternative A. During renovation activities, minor amounts of air pollutant emissions could be generated; however, it is anticipated that the emissions would not result in a significant air quality impact. Therefore, air quality impacts would be less than significant under Alternative A, and impacts under Alternative A would be less than those associated with the proposed project.

Biological Resources

Under Alternative A, no trees or other biological resources would be removed or displaced. The hotel would continue to occupy the project site. As discussed in Section IV.D (Biological Resources) of this Draft EIR, no rare, threatened, or endangered tree species currently on the project site. Furthermore, the project site does not contain any locally designated natural habitat or plant community, wetland habitat, or wildlife movement/migration corridors. Therefore, no impact would occur with respect to biological resources, and impacts under Alternative A would be less than those associated with the proposed project.

Cultural Resources

No excavation or grading activities would occur under Alternative A. Therefore, there would be no potential to encounter paleontological or archaeological resources at depths not previously excavated. As such, there would be no impact on paleontological or archaeological resources, and impacts under Alternative A would be less than those associated with the proposed project.

Energy Conservation

Electricity

No additional electricity would be consumed under Alternative A, as compared to the former hotel use. Under the proposed project, there would be a net decrease of approximately 5,396 kWh of electricity per day (see Section IV.F.1, Electricity). Therefore, no impact on electricity would occur, and impacts under Alternative A would be greater than those associated with the proposed project.

Natural Gas

No additional natural gas would be consumed under Alternative A, as compared to the former hotel use. Under the proposed project, there would be a net decrease of approximately 35,190 cf of natural gas per

day (see Section IV.F.2, Natural Gas). Therefore, no impact on natural gas would occur, and impacts under Alternative A would be greater than those associated with the proposed project.

Geology and Soils

Under Alternative A, 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, there would be no impacts on geology or soils, and impacts under Alternative A would be less than those associated with the proposed project.

Hazards and Hazardous Materials

The hotel would continue to occupy the project site under Alternative A. No new or different land uses or activities would occur on the site that would potentially involve the routine transport, use, or disposal of hazardous materials. It is anticipated that materials would continue to be utilized onsite, associated with the hotel's routine maintenance, cleaning, maintenance, and landscaping.

As discussed above, renovation of the hotel interior would likely occur under Alternative A. The renovation activities would include the removal of non-friable asbestos-containing materials (ACMs). However, the non-friable ACMs would be removed in accordance with the previously prepared Asbestos Management Plan cited in Mitigation Measure H-3 in Section IV.H (Hazards and Hazardous Materials) of this Draft EIR. With the implementation of the Asbestos Management Plan, impacts with respect to non-friable ACMs would be less than significant. The existing underground storage tank at the rear of the project site would remain in place. Under Alternative A, no excavation would occur which could potentially result in the release of methane gas. Therefore, impacts associated with hazards or hazardous materials would be less than significant, and impacts under Alternative A would be less than those associated with the proposed project.

Land Use Planning

The hotel would continue to occupy the project site under Alternative A. There would be no potential for conflict with the site's land use or zoning designations. Regarding community division, this alternative would not involve any development that would have the potential to physically divide an established community. Overall, no land use impacts would occur under Alternative A, and impacts would be similar to those associated with the proposed project.

Mineral Resources

As no development would occur on the site under Alternative A, no mineral extraction activities or obstacles to mineral extraction activities would occur. Therefore, there would be no impacts on mineral resources, and impacts under Alternative A would be less than those associated with the proposed project.

Noise

As no new development would occur on the site under Alternative A, no noise would be generated from construction activities. Furthermore, no new structures or other sources of noise beyond the existing hotel use would be developed on the project site under this alternative. Therefore, there would be no impacts associated with noise, and impacts under Alternative A would be less than those associated with the proposed project.

Population and Housing

No new land uses that could result in an increase in population or housing would be developed under Alternative A beyond that which was associated with the former hotel. With the implementation of the proposed project, 147 residences would be developed and approximately 392 persons would reside on the project site, and there would be 202 fewer employees at the project site. As approximately 282 employees were associated with the former hotel, it is anticipated that approximately 282 employees would work on the project site under Alternative A. Although the 282 employees under Alternative A represent an increase when compared to the 80 employees that would result from the development of the proposed project, the 282 employees would not represent an increase in indirect population growth when compared to existing conditions. Overall, no impact on population or housing would occur under Alternative A, and impacts would be greater than those associated with the proposed project.

Public Services***Fire Protection***

Under Alternative A, no new housing or other land uses would be developed which could potentially increase the demand for fire protection services. As discussed in Section IV.L (Population and Housing), the proposed project would introduce approximately 392 residents and 202 fewer employees to the project site, as compared to the former hotel. In addition, it is estimated that the average daily total number of former hotel guests (i.e., non-residents and non-employees) was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). As such, it is anticipated that approximately the same number of hotel guests would visit the project site under Alternative A. Although the 334 hotel guests under Alternative A represent an increase when compared to the development of the proposed project, the 334 guests would not represent an increase when compared to existing conditions. As such, the proposed project would result in an increase in the number of residents, and a decrease in the number of employees and site visitors. This decrease in the daily population on the site associated with the proposed project would not generate an increase in the demand for fire protection services.

With respect to fire flow, response distance, and emergency access, the fire protection needs under Alternative A would be similar to that of the former hotel. As the fire flow, response distance, and emergency access associated with the former hotel was considered to be adequate, they would be

considered adequate under Alternative A. Therefore, no impacts on fire protection services would occur under Alternative A, and impacts would be less than those associated with the proposed project.

Police Protection

Under Alternative A, no new housing or other land uses would be developed which could potentially increase the demand for fire protection services. As discussed in Section IV.L (Population and Housing), the proposed project would introduce approximately 392 residents and 202 fewer employees to the project site, as compared to the former hotel. In addition, it is estimated that the average daily total number of former hotel guests was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). As such, it is anticipated that approximately the same number of hotel guests would visit the project site under Alternative A. Although the 334 hotel guests under Alternative A represent an increase when compared to the development of the proposed project, the 334 guests would not represent an increase when compared to existing conditions. As such, the proposed project would result in an increase in the number of residents, and a decrease in the number of employees and site visitors. This decrease in the daily population on the site associated with the proposed project would not generate an increase in the demand for police protection services. Therefore, no impacts on police protection services would occur under Alternative A, and impacts would be less than those associated with the proposed project.

Schools

No new population or associated students would be generated under Alternative A. A net increase of approximately three elementary students, two middle school students, and three high school students (approximately eight students total) would be generated by development of the proposed project, which would result in a slight increase in demand for school services. Therefore, no impact on school services would occur under Alternative A, and impacts would be less than those associated with the proposed project.

Recreation and Parks

Under Alternative A, there would be no new demand for additional public parkland or recreational facilities in the site vicinity. The proposed project would result in a demand for approximately 1.57 acres of public parkland or recreational facilities. Therefore, no impact on recreational facilities or parks would occur under Alternative A, and impacts would be less than those associated with the proposed project.

Libraries

Under Alternative A, there would be no new demand for additional library space in the site vicinity as employees of commercial sites are not likely to patronize libraries during working hours, as they are more likely to use libraries near their homes during non-work hours. The proposed project would result in a demand for approximately 196 square feet of library space. Therefore, no impact on library services

would occur under Alternative A, and impacts would be less than those associated with the proposed project.

Transportation and Traffic

Under Alternative A, no additional traffic would be generated beyond the traffic associated with the former hotel. Similarly, the development of the proposed project would not generate any new traffic (see Section IV.N, Transportation and Traffic). Therefore, no impact on transportation or traffic would occur under Alternative A, and impacts would be similar to the proposed project.

Utilities and Service Systems

Wastewater

No additional wastewater would be generated on the project site under Alternative A, as compared to the former hotel use. Under the proposed project, there would be a net decrease of approximately 6,390 gpd of wastewater (see Section IV.O.1, Wastewater). Therefore, no impact on wastewater services would occur, and impacts under Alternative A would be greater than those associated with the proposed project.

Water Supply

No additional demand for water supply would be generated on the project site under Alternative A, as compared to the former hotel use. Under the proposed project, there would be a net decrease in demand of approximately 6,756 gpd of water (see Section IV.O.2, Water). Therefore, no impact on water supply services would occur, and impacts under Alternative A would be greater than those associated with the proposed project.

Solid Waste

No additional solid waste would be generated on the project site under Alternative A, as compared to the former hotel use. The proposed project would result in the generation of approximately 244 pounds of solid waste per day (see Section IV.O.3, Solid Waste). Therefore, no impact on solid waste services would occur, and impacts under Alternative A would be less than those associated with the proposed project.

Relationship to Project Objectives

Although the No Project alternative would avoid most of the environmental impacts associated with the proposed project, it would increase a few of the environmental impacts. Furthermore, the No Project alternative would not satisfy all of the project objectives. Specifically, the No Project alternative would not:

- Provide an attractive and harmonious development in Century City, which takes into

- consideration the architectural character and the environmental setting of the area;
- Provide high-quality housing for local and area residents to meet existing and future needs of those desiring to live in Century City and to help alleviate the substantial housing shortage in the City;
 - Redevelop the former St. Regis Hotel property with a financially viable development;
 - Create a high-quality development that promotes integrated urban living by offering residential amenities and services to complement and enhance the surrounding Century City community;
 - Provide luxury housing in close proximity to offices and retail land uses in Century City;
 - Redevelop the former St. Regis Hotel property in a manner that is consistent with the trip allocations and development requirements in the Century City North Specific Plan; and
 - Create a landmark high-rise building that complements the character of the area through appropriate scale and design.

The No Project alternative would meet the following project objectives:

- Provide for the housing, commercial, or other service needs of the current and future residents of West Los Angeles.

Reduction of Significant Project Impacts

The proposed project would not result in any significant impacts after mitigation. Similar to the proposed project, Alternative A would not result in any significant environmental impacts associated with its development.

B. ENTERTAINMENT COMPLEX ALTERNATIVE

Alternative B would include the demolition of the former hotel and the development of a building with a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space. The building would be four stories and approximately 50 feet in height. The building would have a tiered appearance, with the first level larger than upper levels. The theater would extend from the first level to the third level. The first level would include 75,000 square feet of theater space and approximately 5,000 square feet of restaurant/banquet space. The second level would include approximately 3,000 feet of restaurant/banquet space, and the fourth level would include approximately 2,000 square feet of restaurant/banquet space. The third level would contain the theater balcony. Parking would be provided in several levels of subterranean parking, as well as at the offsite parking structure to the west of the site. The building footprint under Alternative B would be substantially larger than the proposed project, resulting in proportionally less landscaped area and open space.

Aesthetics

Under Alternative B, a four-story tiered building would be developed on the project site. The 50-foot-high building that would be developed with this alternative would not shade any adjacent sensitive uses (i.e., residences to the southwest and east of the project site) as it is dramatically shorter in height when compared to the former hotel. It is anticipated that shadow lengths under Alternative B would extend up to approximately 161 feet during the winter solstice and up to approximately 68 feet during the summer solstice. However, it is anticipated that none of the shading that would occur under Alternative B would cast shadows onto nearby residences due to the northward orientation of the shadows during the winter solstice and the short extent of the shadows during the summer solstice. For comparison, shadow lengths with the development of the proposed project would extend up approximately 1,587 feet during the winter solstice and up to approximately 694 feet during the summer solstice (see Figures IV.B-1 and IV.B-2). Similar to the proposed project, the shading associated with the former hotel (see Figures IV.B-1 and IV.B-2) would be greater than what would occur under Alternative B. Therefore, shadow impacts under Alternative B would be less than significant, and would be less than those associated with the proposed project.

The building footprint under Alternative B would be substantially larger than the proposed project, resulting in proportionally less landscaped area and open space. The limited landscaped area and open space associated with this Alternative would result in a general feeling of “massing” when viewed from nearby land uses. However, when viewed from afar, since the building under Alternative B would be dramatically shorter in height than the proposed project, impacts associated with views would be less than significant and less than those associated with the proposed project.

With respect to impacts associated with light/glare, it is anticipated that the building materials that would be utilized with the development of the building under Alternative B would be similar to the proposed project, and would not result in any light/glare impacts.

Overall, aesthetic impacts would be less than significant under Alternative B, and less than those associated with the proposed project.

Air Quality

Construction activities under Alternative B would include the demolition of the existing hotel building and the development of an entertainment complex. Peak daily construction activities under Alternative B would be similar to those associated with the proposed project. As such, construction-related daily emissions under Alternative B would not exceed SCAQMD significance thresholds for ROG, NO_x, CO, SO_x and PM₁₀ during the construction period. Therefore, the potential air quality impact associated with the construction of Alternative B would be less than those associated with the proposed project.

It is estimated that the entertainment complex under Alternative B would generate approximately 5,527 daily trips, with 38 A.M. peak hour and 134 P.M. peak hour trips. Considering the daily trips generated by the former hotel, Alternative B would result in a net increase of approximately 2,557 daily trips (5,527 – 2,970). As such, Alternative B would result in a net increase in daily trips as compared to the proposed project. However, no intersections would be significantly impacted during either the A.M. or P.M. peak hour under Alternative B.

Therefore, even though Alternative B would generate more average daily traffic trips than those generated by the proposed project and motor vehicle trips are the primary source of daily operational emissions associated with the proposed project, if an intersection is not significantly impacted, it can be assumed that average daily emissions would not increase beyond the federal and State thresholds.

Overall, air quality impacts would be less than significant under Alternative B, and impacts would be greater than those associated with the proposed project.

Biological Resources

Under Alternative B, landscaping would be provided throughout the project site. Similar to the proposed project, existing trees would be displaced and moved to different areas throughout the site. However, the amount of landscaped open space would be substantially reduced under this alternative. Fewer trees and other vegetation would be planted throughout the project site. As discussed in Section IV.D (Biological Resources) of this Draft EIR, no rare, threatened, or endangered tree species currently on the project site. Also, the project site does not contain any locally designated natural habitat or plant community, wetland habitat, or wildlife movement/migration corridors. Therefore, impacts on biological resources would be less than significant under Alternative B, and would be greater than the proposed project.

Cultural Resources

Several subterranean levels of parking would be developed under Alternative B. However, no excavation would occur below depths previously excavated during the development of the former hotel. However,

the lateral extent of excavation associated with this alternative would extend beyond the building footprint of the former hotel, similar to the proposed project. Therefore, it is anticipated that previously unknown paleontological or archaeological resources could be encountered during excavation activities and Mitigation Measures E-1 thru E-6 for the proposed project would be implemented under Alternative B. With these mitigation measures, impacts associated with cultural resources would be less than significant under Alternative B. As such, impacts under Alternative B would be similar to those associated with the proposed project.

Energy Conservation

Electricity

Alternative B would result in the development of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space on the project site. The projected demand for electricity supply is based on the amount of each land use developed on the project site. Based on the electricity generation rates listed in Section IV.F.1 (Electricity) of this Draft EIR and considering the former hotel use, Alternative B would decrease electricity consumption on the project site by approximately 6,709 kWh per day (see Table VI-1, Alternative B Electricity Consumption).

**Table IV-1
Alternative B Electricity Consumption**

Land Use	Size	Generation Rate ^a	Total Daily Electricity Consumption (kWh)
Theater	75,000	10.50 kWh/sf/yr	2,158
Restaurant	10,000 sf	47.45 kWh/sf/yr	1,300
Subtotal Alternative B			3,458
Former Hotel	-373,000 sf	9.95 kWh/sf/yr	-10,168
Total			-6,709
<i>Notes:</i>			
<i>sf = square feet; kWh = kilowatt hour; yr = year</i>			
^a Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.			

The implementation of the proposed project would result in the net decrease of approximately 5,396 kWh of electricity per day (see Section IV.F.1 (Electricity) of this Draft EIR). Similar to the proposed project, Alternative B would result in a decrease in the consumption of electricity on the project site. Therefore, there would be no impact on electricity services under Alternative B, and electricity impacts would be less than the proposed project.

Natural Gas

Alternative B would result in the development of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space on the project site. The projected demand for natural gas supply is based on the

amount of each land use developed on the project site. Based on the natural gas generation rates listed in Section IV.F.2 (Natural Gas) of this Draft EIR and considering the former hotel use, Alternative B would decrease natural gas consumption on the project site by approximately 51,463 cf per day (see Table VI-2, Alternative B Natural Gas Consumption).

**Table VI-2
Alternative B Natural Gas Consumption**

Land Use	Size	Generation Rate^a	Total Daily Natural Gas Consumption (cf)
Theater	75,000	2.9 cf/sf/mo	7,250
Restaurant	10,000 sf	2.9 cf/sf/mo	967
Subtotal Alternative B			8,217
Former Hotel	-373,000 sf	4.8 cf/sf/mo	-59,680
Total			-51,463
<i>Notes:</i> <i>sf = square feet; cf = cubic feet; yr = year</i>			
^a <i>Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.</i>			

The implementation of the proposed project would result in the net decrease of approximately 35,190 cf of natural gas per day (see Section IV.F.2 (Natural Gas) of this Draft EIR). Similar to the proposed project, Alternative B would result in a decrease in the consumption of natural gas on the project site. Therefore, there would be no impact on natural gas services under Alternative B, and natural gas impacts would be less than the proposed project.

Geology and Soils

The footprint of the entertainment complex under Alternative B would be substantially larger than the building footprint associated with the proposed project. In addition, several levels of subterranean parking would be provided with the development of this alternative. As such, more excavation would be needed under Alternative B than the proposed project. Nonetheless, the same geological conditions and associated seismic risks would occur under Alternative B as the proposed project. Therefore, the geology and soils impacts under Alternative B would be less than significant and greater than the impact associated with the proposed project.

Hazards and Hazardous Materials

The Phase I ESA that was conducted for the proposed project applied to the entire project site. Since this alternative is located on the same site, the Phase I ESA would equally apply to this alternative. The existing 2,000-gallon diesel UST would be removed with the development of this alternative. Any new UST that may be installed with this alternative would need to comply with applicable regulations, as indicated in Mitigation Measure D-1 for the proposed project. A methane mitigation plan would be implemented for Alternative B, similar to that which has been prepared for the proposed project. In

addition, all asbestos-containing materials (ACMs) would be removed, as indicated in Mitigation Measure D-3. With these measures, impacts associated with hazards and hazardous materials would be less than significant under Alternative B.

Furthermore, the theater and restaurant proposed under Alternative B would not routinely introduce any hazardous materials beyond those hazardous materials associated with the routine maintenance of the proposed project (e.g., routine cleaning, maintenance, and landscaping).

Overall, hazards and hazardous materials impacts would be less than significant with mitigation, and impacts under Alternative B would be similar to those associated with the proposed project.

Land Use Planning

Alternative B would conform to the provisions outlined in the West Los Angeles Community Plan (CPA), and the Century City North Specific Plan (the "Specific Plan"). The zoning for the project site, as established in the Los Angeles Municipal Code (LAMC), is C2-2-O. As Alternative B consists of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space (a decrease in overall floor area in comparison to the proposed project), it would be consistent with the CPA's Regional Commercial designation and the Specific Plan density requirement (6:1 FAR).

In addition, the Specific Plan controls development within the Specific Plan area by allocating a certain number of "Specific Plan Trips" among its parcels, thereby limiting development that would cause trip generations to exceed those allocations. Alternative B's Traffic Impact Analysis is presented in greater detail below under Transportation and Traffic of this section.

As Alternative B consists of a four-story building, it would not be consistent with the high-rise land use pattern along Avenue of the Stars and Olympic Boulevard, which generally includes multi-family, high-rise apartments and condominiums, high-rise hotels, and high-rise office buildings. However, it would be consistent in that there are existing commercial uses along Avenue of the Stars and Olympic Boulevard. Therefore, Alternative B would result in a less than significant impact with respect to land use compatibility.

Alternative B would not physically divide an established community but rather provide a transition from commercial and office uses along Avenue of the Stars into the multi-family residential uses to the southwest of the project site. Therefore, no impact would occur.

Overall, land use impacts would be less than significant, and impacts under Alternative B would be similar to those associated with the proposed project.

Mineral Resources

As discussed in Section IV.J (Mineral Resources) of this Draft EIR, the project site is located in the Beverly Hills Oilfield. Although the project site is zoned for oil and mineral extraction activities, the site

does not contain oil wells nor does it currently conduct mineral extraction activities. Similar to the proposed project, Alternative B would not involve any oil or mineral extraction activities. Therefore, impacts on mineral resources under Alternative B would be less than significant and similar to the proposed project.

Noise

Demolition activities under Alternative B would be similar to the proposed project. However, construction activities under Alternative B would be less than those associated with the proposed project because Alternative B would involve the construction of less Floor Area than the proposed project. Similar to the proposed project, construction of Alternative B would cause a substantial temporary increase in ambient noise levels in the project vicinity above existing levels. This would result in a significant, albeit temporary, noise impact. However, the number of days that noise levels are generated over the entire construction period would be less under Alternative B as compared to the proposed project due to the reduced amount of Floor Area.

Groundborne vibration velocity levels generated during the construction of the entertainment complex under Alternative B would be similar to those generated by construction of the proposed project. As such, they would not exceed the threshold of significance for residences and buildings where people normally sleep and would be limited to daytime hours in accordance with City policies, and would not result in a significant impact. As with the construction noise levels, the number of days that groundborne vibration is generated over the entire construction period would be less under Alternative B as compared to the proposed project due to the reduced amount of Floor Area.

When operational, Alternative B would increase the amount of human activity at the project site during the evening hours when performances are held. However, the noise levels from the onsite activities would not be expected to exceed City thresholds for outdoor or interior living spaces. Therefore, operational noise levels under Alternative B would result in temporary or periodic increases in noise levels that are similar to those associated with the proposed project.

Although Alternative B would generate more average daily traffic trips than those generated by the proposed project, they would occur during off-peak hours and, therefore, would not contribute to peak-hour traffic volumes. Therefore, Alternative B would result in a less-than-significant impact with respect to offsite traffic noise, and this impact would be less than those associated with the proposed project.

Overall, noise impacts would be less than significant under Alternative B, and less than those associated with the proposed project.

Population and Housing

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. Similar to the proposed project, this alternative

would not result in the displacement of any existing homes or people. Alternative B would not result in the development of any residences and, therefore, would not directly result in any population or housing growth. However, Alternative B would result in indirect population and a demand for housing, associated with the theater and restaurant land uses. The implementation of Alternative B is expected to result in 190 jobs (2.2371 employees/1,000 sf¹ x 85,000 sf). Considering the employment of the former hotel (282 jobs), the implementation of Alternative B would be expected to result in the net decrease of jobs (190 - 282 = -92). Based upon this net decrease in jobs, Alternative B would not indirectly result in the demand for any new housing units within West Los Angeles.

Comparatively, the proposed project would result in the generation of 147 new residences, approximately 392 new residents, and 80 employees on the project site. Therefore, population and housing impacts under Alternative B would be less than significant, and would be less than those associated with the proposed project.

Public Services

Fire Protection

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. The implementation of Alternative B is expected to result in 190 jobs (2.2371 employees/1,000 sf² x 85,000 sf). Considering the employment of the former hotel (282 jobs), the implementation of Alternative B would be expected to result in the net decrease of jobs (190 - 282 = -92). In addition, it is estimated that the average daily total number of former hotel guests was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). If all 3,000 seats of the theater under this alternative were occupied, the onsite population would likely be greater than 3,000 persons (including employees and restaurant/banquet visitors). As such, considering the estimated number of visitors and employees that would represent the daily onsite population under Alternative B, the daily onsite population would be greater than that associated with the proposed project. Comparatively, the proposed project would result in the generation of 147 new residences, approximately 392 new residents, and 80 employees on the project site.

With respect to fire flow, response distance, and emergency access, the fire protection needs under Alternative B would be greater than that of the former hotel. It is likely that the fire flow and emergency access requirements associated with the entertainment complex under Alternative B would be greater than

¹ Both restaurant and theater land uses generate 2.2371 employees per 1,000 square foot (Source: Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002).

² Both restaurant and theater land uses generate 2.2371 employees per 1,000 square foot (Source: Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002).

that associated with the proposed project. Therefore, Alternative B would have a potentially significant impact on fire protection services, and impacts would be greater than those associated with the proposed project.

Police Protection

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. The implementation of Alternative B is expected to result in 190 jobs (2.2371 employees/1,000 sf³ x 85,000 sf). Considering the employment of the former hotel (282 jobs), the implementation of Alternative B would be expected to result in the net decrease of jobs (190 - 282 = -92). In addition, it is estimated that the average daily total number of former hotel guests was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). If all 3,000 seats of the theater under this alternative were occupied, the onsite population would likely be greater than 3,000 persons (including employees and restaurant/banquet visitors). As such, considering the estimated number of visitors and employees that would represent the daily onsite population under Alternative B, the daily onsite population would be greater than that associated with the proposed project. Comparatively, the proposed project would result in the generation of 147 new residences, approximately 392 new residents, and 80 employees on the project site. As the onsite population under Alternative B would be greater than the proposed project and would be greater than that associated with the former hotel, Alternative B would result in a potentially significant impact on police protection services, and impacts would be greater than those associated with the proposed project.

Schools

Alternative B would result in the development of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space on the project site. The projected student population is based on the type of each land use developed on the project site. Based on the student generation rates listed in Section IV.M.3 (Schools) of this Draft EIR and considering the former hotel use, Alternative B would decrease student generation on the project site by approximately three students (see Table VI-3, Estimated Student Generation by Alternative B).

³ Both restaurant and theater land uses generate 2.2371 employees per 1,000 square foot (Source: Los Angeles Unified School District, Commercial/Industrial Development School Fee Justification Study, September 2002).

**Table VI-3
Estimated Student Generation by Alternative B**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Existing					
Hotel ^a	373,000 sf (297 rms)	3	1	1	5
Alternative B					
Theater ^b	75,000 sf	1	1	1	3
Restaurant ^b	10,000 sf	0	0	0	0
Alternative B Total		1	1	1	3
Less Existing Total		3	1	1	5
Net Alternative B Total		-2	2	2	2
^a Note: sf=square feet; rm=room. ^a Student generation rates are as follows for hotel land uses: 0.0076 elementary, 0.0035 middle and 0.0034 high school students per 1,000 square feet. Los Angeles Unified School District, School District Fee Justification Study, September 2002. ^b Student generation rates are as follows for retail and service land uses: 0.0149 elementary, 0.0069 middle and 0.0067 high school students per 1,000 square feet. Los Angeles Unified School District, School District Fee Justification Study, September 2002. Source: Christopher A. Joseph & Associates, September 2005.					

Based on the number of students generated in Section IV.M.3 (Schools) of this Draft EIR, a net increase of approximately three elementary students, two middle school students, and three high school students (approximately eight students total) would be generated by development of the proposed project. Alternative B would result in a decrease in the generation of students on the project site. Therefore, school impacts under Alternative B would be less than significant, and school impacts would be less than the proposed project.

Recreation and Parks

Alternative B would result in the development of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space on the project site. Under Alternative B, there would be no new demand for additional public parkland or recreational facilities in the site vicinity as employees of the proposed restaurant/commercial uses are less likely to patronize parks during working hours, and are more likely to use parks near their homes during non-work hours. The proposed project would result in a demand for approximately 1.57 acres of public parkland or recreational facilities. Therefore, no impact on recreational facilities or parks would occur under Alternative B, and impacts would be less than those associated with the proposed project.

Libraries

Alternative B would result in the development of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space on the project site. Under Alternative B, there would be no new demand for

additional library facilities in the site vicinity as employees of the proposed restaurant/commercial uses are less likely to patronize libraries during working hours, and are more likely to use libraries near their homes during non-work hours. The proposed project would result in a demand for approximately 196 square feet of library space. Therefore, no impact on library facilities would occur under Alternative B, and impacts would be less than those associated with the proposed project.

Transportation and Traffic

It is estimated that the entertainment complex under Alternative B would generate approximately 5,527 daily trips, with 38 A.M. peak hour and 134 P.M. peak hour trips. Considering the daily trips generated by the former hotel, Alternative B would result in a net increase of approximately 2,557 daily trips (5,527 – 2,970). As such, Alternative B would result in a net increase in daily trips as compared to the proposed project. However, the operational characteristics of entertainment uses are such that trips generally occur during off-peak hours. Similar to the proposed project, no intersections would be significantly impacted during either the A.M. or P.M. peak hour under Alternative B. Therefore, traffic impacts would be less than significant under Alternative B, and impacts would be greater than those associated with the proposed project.

Utilities and Service Systems

Wastewater

Alternative B would result in the development of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space on the project site. The projected generation of wastewater is based on the amount of each land use developed on the project site. Based on the wastewater generation rates listed in Section IV.O.1 (Wastewater) of this Draft EIR and considering the former hotel use, Alternative B would decrease wastewater generation on the project site by approximately 23,610 gpd (see Table VI-4, Alternative B Wastewater Generation).

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

Land Use	Size	Generation Rate ^a	Total Wastewater Generation (gpd)
Theater	3,000 seats	4 gallons/seat/day	12,000
Restaurant	10,000 sf	300 gallons/1,000 sf/day	3,000
Subtotal Alternative B			15,000
Former Hotel	-297 rooms	130 gallons/room/day	-38,610
Total			-23,610
<i>Notes:</i> <i>du = dwelling unit; sf = square feet; gpd = gallons per day</i>			
<i>^a Source: City of Los Angeles, Bureau of Engineering, August 2, 2005.</i>			

The implementation of the proposed project would result in the net decrease of approximately 5,630 gpd of wastewater (see Section IV.O.1 (Wastewater) of this Draft EIR). Similar to the proposed project, Alternative B would result in a decrease in the generation of wastewater on the project site. Therefore, there would be no impact on wastewater services under Alternative B, and wastewater impacts would be less than those associated with the proposed project.

Water Supply

Alternative B would result in the development of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space on the project site. The projected demand for water is based on the amount of each land use developed on the project site. Based on the water consumption rates listed in Section IV.O.2 (Water) of this Draft EIR and considering the former hotel use, Alternative B would decrease water consumption on the project site by approximately 27,732 gpd (see Table VI-5, Alternative B Water Consumption).

**Table VI-5
Alternative B Water Consumption**

Land Use	Size	Consumption Rate^a	Total Water Consumption (gpd)
Theater	3,000 seats	5 gallons/seat/day	15,000
Restaurant	10,000 sf	360 gallons/1,000 sf/day	3,600
Subtotal Alternative B			18,600
Former Hotel	- 297 rooms	156 gallons/room/day	-46,332
Total			-27,732
<i>Notes:</i> <i>du = dwelling unit; sf = square feet; gpd = gallons per day</i>			
<i>^a Source: City of Los Angeles, Bureau of Engineering, August 2, 2005. Water consumption assumed to be 120% of wastewater generated for a given land use.</i>			

The implementation of the proposed project would result in the net decrease of approximately 6,756 gpd of water (see Section IV.O.2 (Water) of this Draft EIR). Similar to the proposed project, Alternative B would result in a decrease in the consumption of water on the project site. Therefore, there would be no impact on water supply services under Alternative B, and water supply impacts would be less than those associated with the proposed project.

Solid Waste

Alternative B would result in the development of a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space on the project site. The projected generation of solid waste is based on the amount of each land use developed on the project site. Based on the solid waste generation rates listed in Section IV.O.3 (Solid Waste) of this Draft EIR and considering the former hotel use, Alternative B would

decrease solid waste generation on the project site by approximately 169 pounds per day (see Table VI-6, Alternative B Solid Waste Generation).

**Table VI-6
Alternative B Solid Waste Generation**

Land Use	Size	Daily Generation Rate^a	Total Daily Solid Waste Generation (lbs)
Theater	75,000 sf	5 lbs/1,000 sf/day	375
Restaurant	10,000 sf	5 lbs/1,000 sf/day	50
Subtotal Alternative B			425
Former Hotel	-297 rooms	2 lbs/room	-594
Total			-169
<i>Notes: du=dwelling unit; lbs=pounds; sf=square feet</i>			
<i>^a Source: City of Los Angeles Bureau of Sanitation, Solid Waste Generation, 1981. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.</i>			

The implementation of the proposed project would result in the net increase of approximately 244 pounds per day of solid waste (see Section IV.O.3 (Solid Waste) of this Draft EIR). Alternative B would result in a decrease in the generation of solid waste on the project site. Therefore, there would be no impact on solid waste services under Alternative B, and solid waste impacts would be less than those associated with the proposed project.

Relationship to Project Objectives

Although the Entertainment Complex alternative would avoid several of the environmental impacts associated with the proposed project, it would increase several of the environmental impacts. Furthermore, the Entertainment Complex alternative would not satisfy all of the project objectives. Specifically, the Entertainment Complex alternative would not:

- Provide high-quality housing for local and area residents to meet existing and future needs of those desiring to live in Century City and to help alleviate the substantial housing shortage in the City; and
- Redevelop the former St. Regis Hotel property in a manner that is consistent with the trip allocations and development requirements in the Century City North Specific Plan;
- Create a landmark high-rise building that complements the character of the area through appropriate scale and design;

- Create a high-quality development that promotes integrated urban living by offering residential amenities and services to complement and enhance the surrounding Century City community; and
- Provide luxury housing in close proximity to offices and retail land uses in Century City.

The Entertainment Complex alternative would meet the following project objectives:

- Provide an attractive and harmonious development in Century City, which takes into consideration the architectural character and the environmental setting of the area;
- Provide for the housing, commercial, or other service needs of the current and future residents of West Los Angeles; and
- Redevelop the former St. Regis Hotel property with a financially viable development.

Reduction of Significant Project Impacts

Neither the proposed project nor this alternative would result in any significant impacts after mitigation.

C. OFFICE BUILDING ALTERNATIVE

Alternative C would include the demolition of the former hotel and the development of a 250,000-square-foot office building on the project site. This is the maximum amount of office space that could be developed on the project site under the current General Plan and zoning designations, in compliance with Section 12.21.2 of the LAMC, and considering the number of Specific Plan Trips allocated to the site.

The office building under Alternative C would be approximately 24 stories and approximately 300 feet in height. Each level would be approximately 18,000 square feet, and the building would be rectangular in shape. The upper 14 stories would include approximately 250,000 square feet of office space, and the lower 10 stories would include approximately 550 parking spaces. An additional 447 parking spaces would be provided offsite in the existing adjacent parking structure. Similar to the proposed project, primary access would be provided from Avenue of the Stars via the existing driveway.

Landscaping and passive open space would surround the building, including walkways and picnic tables.

Aesthetics

Under Alternative C, an approximately 300-foot-high office building would be developed on the project site. The office building that would be developed under this alternative would not shade the adjacent sensitive uses (i.e., residences to the southwest and east of the project site) as it is slightly shorter in height when compared to the former hotel. As such, the shading associated with the former hotel illustrated in Figures IV.B-1 and IV.B-2 would be greater than what would occur under Alternative C. It is anticipated that shadow lengths under Alternative C would extend up to approximately 980 feet during the winter solstice and up to approximately 448 feet during the summer solstice. The shadows would be oriented northward during the winter solstice, and the shadows during the summer solstice would not extend far enough to reach the residences to the east. Therefore, shadow impacts under Alternative C would be less than significant, and would be less than those associated with the proposed project.

With respect to impacts associated with light/glare, it is anticipated that the building materials that would be utilized with the development of the office building under Alternative C would be similar to the proposed project, and would not result in any light/glare impacts. As the office building under Alternative C would be approximately eight stories less than the proposed project, potential impacts upon visual resources, including views, would be less than significant and less than those associated with the proposed project.

Air Quality

Construction activities under Alternative C would include the demolition of the existing hotel building and the development of an office building. Peak daily construction activities under Alternative C would be similar to those associated with the proposed project. As such, construction-related daily emissions under Alternative C would not exceed SCAQMD significance thresholds for ROG, NO_x, CO, SO_x and

PM₁₀ during the construction period. Therefore, the potential air quality impacts associated with the construction of Alternative C would be less than those associated with the proposed project.

When operational, it is estimated that the office building under Alternative C would generate approximately 3,500 daily trips, with 390 A.M. peak hour and 503 P.M. peak hour trips. Considering the daily trips generated by the former hotel, Alternative C would result in a net increase of approximately 530 daily trips (3,500 – 2,970). As such, Alternative C would result in a net increase in daily trips as compared to the proposed project. However, no study intersections would be significantly impacted during either the A.M. or P.M. peak hour under Alternative C. Even though Alternative C would generate more average daily traffic trips than those generated by the proposed project, if a study intersection is not significantly impacted, it can be assumed that average daily emissions would not increase beyond the federal and State thresholds. Therefore, operational air quality impacts would be less than significant under Alternative C, and would be greater than those associated with the proposed project.

Biological Resources

Under Alternative C, landscaping would be provided throughout the project site. Similar to the proposed project, existing trees would be displaced and moved to different areas throughout the site. Overall, the amount of landscaping and open space would be similar to or slightly greater than the proposed project under this alternative. As discussed in Section IV.D (Biological Resources) of this Draft EIR, no rare, threatened, or endangered tree species currently on the project site. Also, the project site does not contain any locally designated natural habitat or plant community, wetland habitat, or wildlife movement/migration corridors. Therefore, impacts on biological resources would be less than significant, and impacts under Alternative B would be similar to the proposed project.

Cultural Resources

Under Alternative C, parking would be provided in the first 10 stories of the proposed building and no subterranean parking would be developed. Furthermore, no excavation would occur below depths previously excavated during the development of the former hotel and the lateral extent of excavation associated with this alternative would not extend beyond the building footprint of the former hotel. Therefore, it is not anticipated that any previously unknown paleontological or archaeological resources would be encountered during excavation activities. As such, there would be no impact on paleontological or archaeological resources, and impacts under Alternative C would be less than those associated with the proposed project.

Energy Conservation

Electricity

Alternative C would result in the development of a 250,000-square foot office building on the project site. The projected demand for electricity supply is based on the amount of each land use developed on the

project site. Based on the electricity generation rates listed in Section IV.F.1 (Electricity) of this Draft EIR and considering the former hotel use, Alternative C would decrease electricity consumption on the project site by approximately 1,298 kWh per day (see Table VI-7, Alternative C Electricity Consumption).

**Table VI-7
Alternative C Electricity Consumption**

Land Use	Size	Generation Rate ^a	Total Daily Electricity Consumption (kWh)
Office	250,000	12.95 kWh/sf/yr	8,870
Subtotal Alternative C			8,870
Former Hotel	-373,000 sf	9.95 kWh/sf/yr	-10,168
Total			-1,298
<i>Notes:</i> <i>sf = square feet; kWh = kilowatt hour; yr = year</i> ^a <i>Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993.</i>			

The implementation of the proposed project would result in the net decrease of approximately 5,396 kWh of electricity per day (see Section IV.F.1 (Electricity) of this Draft EIR). Similar to the proposed project, Alternative C would result in a decrease in the consumption of electricity on the project site. Therefore, there would be no impact on electricity services under Alternative C, and electricity impacts would be greater than the proposed project.

Natural Gas

Alternative C would result in the development of a 250,000-square foot office building on the project site. The projected demand for natural gas supply is based on the amount of each land use developed on the project site. Based on the natural gas generation rates listed in Section IV.F.2 (Natural Gas) of this Draft EIR and considering the former hotel use, Alternative C would decrease natural gas consumption on the project site by approximately 54,680 cf per day (see Table VI-8 Alternative C Natural Gas Consumption).

**Table VI-8
Alternative C Natural Gas Consumption**

Land Use	Size	Generation Rate^a	Total Daily Natural Gas Consumption (cf)
Office	75,000	2.0 cf/sf/mo	5,000
Subtotal Alternative C			5,000
Former Hotel	-373,000 sf	4.8 cf/sf/mo	-59,680
Total			-54,680
<i>Notes:</i> <i>sf = square feet; cf = cubic feet; yr = year</i>			
<i>^a Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.</i>			

The implementation of the proposed project would result in the net decrease of approximately 35,190 cf of natural gas per day (see Section IV.F.2 (Natural Gas) of this Draft EIR). Similar to the proposed project, Alternative C would result in a decrease in the consumption of natural gas on the project site. Therefore, there would be no impact on natural gas services under Alternative C, and natural gas impacts would be less than the proposed project.

Geology and Soils

As the footprint of the proposed high-rise office building under Alternative C would be within the same general vicinity as the proposed project, the analysis presented in Section IV.G (Geology and Soils) in this Draft EIR would generally apply to Alternative C. However, no subterranean parking would be provided under Alternative C; all of the parking would be above grade. As such, less excavation would be needed under Alternative C when compared to the proposed project. Nonetheless, the same geological conditions and associated seismic risks would occur under Alternative C as the proposed project. Therefore, the geology and soils impacts under Alternative C would be less than significant and similar to the proposed project.

Hazards and Hazardous Materials

Similar to the proposed project, Alternative C would involve the development of a high-rise building on the same site as the proposed project. As discussed in Section IV.H (Hazards and Hazardous Materials) in this Draft EIR, impacts associated with hazards and hazardous materials would be reduced to a less-than-significant level with the implementation of mitigation measures. The mitigation measures that would be implemented with the proposed project would address potential impacts associated with the release of hazardous materials during construction activities. The same mitigation measures that would be implemented with the proposed project would also be implemented under Alternative C. Because development under Alternative C would occur in the same general location as the proposed project and the same mitigation measures would be implemented, the impacts associated with hazards and hazardous

materials under Alternative C would be less than significant with mitigation and would be similar to the proposed project.

Land Use Planning

Alternative C would include the development of an approximately 250,000-square-foot office building on the same site as the proposed project, which is the maximum amount of office space that could be developed under current zoning and land use designations. As indicated in Section IV.I (Land Use Planning) of this Draft EIR, the project site is currently zoned C2-2-O (Commercial, Height District No. 2, Oil Drilling District O). As set forth in the LAMC 12.14, allowable uses in the C2 zone include uses allowed in the C1 zone (i.e., office, business or professional, bakery, stationery store, drug store, grocery store, etc.); uses allowed in the C1.5 zone (i.e., auditorium, broadcasting studio, department store, museum, theater, etc.); more extensive retail stores (i.e., pet stores, carpenter, upholstering shop, tire shop, restaurants, etc.); and uses allowed in the R4 zone (i.e., multiple-family dwelling units).

Similar to the proposed project, Alternative C does not include any proposed changes to the existing zoning and land use designations for the project site. Similar to the proposed project, Alternative C would be consistent with the Century City North Specific Plan. Therefore, there would be a less-than-significant impact with respect to consistency with land use planning under Alternative C.

Regarding community division, this alternative would be developed on the same project site as the proposed project. Similar to the proposed project, this alternative would not physically divide an established community.

Mineral Resources

As discussed in Section IV.J (Mineral Resources) of this Draft EIR, the project site is located in the Beverly Hills Oilfield. Although the project site is zoned for oil and mineral extraction activities, the site does not contain oil wells nor does it currently conduct mineral extraction activities. As the footprint of the proposed high-rise office building under Alternative C would be within the same general vicinity as the proposed project, the analysis presented in Section IV.J (Mineral Resources) in this Draft EIR would generally apply to Alternative C. Therefore, impacts on mineral resources under Alternative C would be less than significant and similar to the proposed project.

Noise

Demolition activities under Alternative C would be similar to the proposed project. However, construction activities under Alternative C would be less than those associated with the proposed project because Alternative C would involve the construction of less Floor Area than the proposed project. Similar to the proposed project, construction of Alternative C would cause a substantial temporary increase in ambient noise levels in the project vicinity above existing levels. This would result in a significant, albeit temporary, noise impact. However, the number of days that noise levels are generated

over the entire construction period would be less under Alternatives D as compared to the proposed project due to the reduced amount of Floor Area.

Groundborne vibration velocity levels generated during the construction of the office building under Alternative C would be similar to those generated by construction of the proposed project. As such, they would not exceed the threshold of significance for residences and buildings where people normally sleep and would be limited to daytime hours in accordance with City policies, and would not result in a significant impact. As with the construction noise levels, the number of days that groundborne vibration is generated over the entire construction period would be less under Alternative C as compared to the proposed project due to the reduced amount of Floor Area.

When operational, Alternative C could result in an increase in the amount of human activity at the project site as compared to the proposed project. However, the noise levels from the onsite activities would not be expected to exceed City thresholds for outdoor or interior living spaces. Therefore, operational noise levels under Alternative C would result in temporary or periodic increases in noise levels that are similar to those associated with the proposed project.

Even though Alternative C would generate more average daily traffic trips than those generated by the proposed project, the increase is not expected to cause a perceptible increase in noise when compared to the proposed project. Therefore, Alternative C would result in a less-than-significant impact with respect to offsite traffic noise levels, and the noise impact would be similar to the proposed project.

Population and Housing

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. Similar to the proposed project, this alternative would not result in the displacement of any existing homes or people. Alternative C would not result in the development of any residences and, therefore, would not directly result in any population or housing growth. However, Alternative C would result in indirect population and a demand for housing, associated with the office land uses. The implementation of Alternative C is expected to result in 874 jobs (3.4965 employees/1,000 sf x 250,000 sf). Considering the employment of the former hotel (282 jobs), the implementation of Alternative C would be expected to result in the net increase of jobs (874 - 282 = 592). Based on an estimate of one new housing unit per new employee, Alternative C employment would indirectly result in the demand for approximately 592 new residences within West Los Angeles. This would represent approximately one-third of the housing growth projected in the West Los Angeles CPA between 2000 and 2010, which could be considered substantial. As indicated in Section IV.L (Population and Housing) of this Draft EIR, the increases in population and housing resulting from the proposed project are not expected to induce substantial population growth. Therefore, Alternative C would indirectly result in the introduction of a greater number employees and the associated demand for housing than the proposed project. As such, the population and housing impact would be potentially significant under Alternative C and would be greater than the proposed project.

Public Services

Fire Protection

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. The implementation of Alternative C is expected to result in 874 jobs (3.4965 employees/1,000 sf x 250,000 sf). Considering the employment of the former hotel (282 jobs), the implementation of Alternative C would be expected to result in the net increase of jobs (874 - 282 = 592). In addition, it is estimated that the average daily total number of former hotel guests was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). As discussed above, approximately 874 employees would work at the office building on a daily basis under Alternative D. Thus, the daily onsite population under Alternative C would be greater than that associated with the proposed project. Comparatively, the proposed project would result in the generation of 147 new residences, approximately 392 new residents, and 80 employees on the project site. Therefore, fire protection impacts would be less than significant under Alternative C; however, Alternative C would increase the demand for fire protection services and impacts would be greater than those associated with the proposed project.

Police Protection

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. The implementation of Alternative C is expected to result in 874 jobs (3.4965 employees/1,000 sf x 250,000 sf). Considering the employment of the former hotel (282 jobs), the implementation of Alternative C would be expected to result in the net increase of jobs (874 - 282 = 592). In addition, it is estimated that the average daily total number of former hotel guests was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). As discussed above, approximately 874 employees would work at the office building on a daily basis under Alternative C. As such, the daily onsite population under Alternative C would be greater than that associated with the proposed project. Comparatively, the proposed project would result in the generation of 147 new residences, approximately 392 new residents, and 80 employees on the project site. Therefore, police protection impacts would be less than significant under Alternative C; however, Alternative C would increase the demand for police protection services and impacts would be greater than those associated with the proposed project.

Schools

Alternative C would result in the development of a 250,000-square-foot office building on the project site. The projected student population is based on the type of each land use developed on the project site. Based on the student generation rates listed in Section IV.M.3 (Schools) of this Draft EIR and considering the former hotel use, Alternative C would increase student generation on the project site by approximately two students (see Table VI-9, Estimated Student Generation by Alternative C).

**Table VI-9
Estimated Student Generation by Alternative C**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Existing					
Hotel ^a	373,000 sf (297 rms)	3	1	1	5
Alternative C					
Office ^b	250,000 sf	6	3	3	12
Less Existing Total		3	1	1	5
Net Alternative C Total		3	2	2	7
^b Note: sf=square feet; rm=room. ^a Student generation rates are as follows for hotel land uses: 0.0076 elementary, 0.0035 middle and 0.0034 high school students per 1,000 square feet. Los Angeles Unified School District, School District Fee Justification Study, September 2002. ^b Student generation rates are as follows for office land uses: 0.0233 elementary, 0.0108 middle and 0.0104 high school students per 1,000 square feet. Los Angeles Unified School District, School District Fee Justification Study, September 2002. Source: Christopher A. Joseph & Associates, September 2005.					

Based on the number of students generated in Section IV.M.3 (Schools) of this Draft EIR, a net increase of approximately three elementary students, two middle school students, and three high school students (approximately eight students total) would be generated by development of the proposed project. Alternative C would result in a decrease in the generation of students on the project site when compared to the proposed project. Therefore, school impacts under Alternative C would be less than significant, and impacts would be less than those associated with the proposed project.

Recreation and Parks

Alternative C would result in the development of a 250,000-square-foot office building on the project site. Under Alternative C, there would be no new demand for additional public parkland or recreational facilities in the site vicinity as employees of the proposed restaurant/commercial uses are less likely to patronize parks during working hours, and are more likely to use parks near their homes during non-work hours. The proposed project would result in a demand for approximately 1.57 acres of public parkland or recreational facilities. Therefore, no impact on recreational facilities or parks would occur under Alternative C, and impacts would be less than those associated with the proposed project.

Libraries

Alternative C would result in the development of a 250,000-square foot office building on the project site. Under Alternative C, there would be no new demand for additional library facilities in the site vicinity as employees of the proposed office uses are less likely to patronize libraries during working hours, and are more likely to use libraries near their homes during non-work hours. The proposed project would result in a demand for approximately 196 square feet of library space. Therefore, no impact on library facilities

would occur under Alternative C, and impacts would be less than those associated with the proposed project.

Transportation and Traffic

It is estimated that the office building under Alternative C would generate approximately 3,500 daily trips, with 390 A.M. peak hour and 503 P.M. peak hour trips. Considering the daily trips generated by the former hotel, Alternative C would result in a net increase of approximately 530 daily trips (3,500 – 2,970). As such, Alternative C would result in a net increase in daily trips as compared to the proposed project.

Alternative C would result in significant impacts at the following six intersections during the A.M. peak hour: Avenue of the Stars and Santa Monica Boulevard; Avenue of the Stars and Pico Boulevard; Santa Monica Boulevard and Century Park West; Olympic Boulevard and Century Park West; Pico Boulevard and Motor Avenue; and Pico Boulevard and Overland Avenue. In addition, Alternative C would result in significant impacts at the following three intersections during the P.M. peak hour: Avenue of the Stars and Pico Boulevard; Santa Monica Boulevard and Century Park West; and Olympic Boulevard and Century Park West. With the development of the proposed project, none of the study intersections would be significantly impacted (see Section IV.N, Transportation and Traffic).

Therefore, traffic impacts would be significant under Alternative C, and impacts would be greater than those associated with the proposed project.

Utilities and Service Systems

Wastewater

Alternative C would result in the development of a 250,000-square foot office building on the project site. The projected generation of wastewater is based on the amount of each land use developed on the project site. Based on the wastewater generation rates listed in Section IV.O.1 (Wastewater) of this Draft EIR and considering the former hotel use, Alternative C would decrease wastewater generation on the project site by approximately 1,110 gpd (see Table VI-10, Alternative C Wastewater Generation).

**Table VI-10
Alternative C Wastewater Generation**

Land Use	Size	Generation Rate^a	Total Wastewater Generation (gpd)
Office	250,000 sf	150 gallons/1,000 sf/day	37,500
Subtotal Alternative C			37,500
Former Hotel	-297 rooms	130 gallons/room/day	-38,610
Total			-1,110
<i>Notes:</i> <i>du = dwelling unit; sf = square feet; gpd = gallons per day</i> ^a <i>Source: City of Los Angeles, Bureau of Engineering, August 2, 2005.</i>			

The implementation of the proposed project would result in the net decrease of approximately 5,630 gpd of wastewater (see Section IV.O.1 (Wastewater) of this Draft EIR). Similar to the proposed project, Alternative C would result in a decrease in the generation of wastewater on the project site. Therefore, there would be no impact on wastewater services under Alternative C, and wastewater impacts would be greater than those associated with the proposed project.

Water Supply

Alternative C would result in the development of a 250,000-square foot office building on the project site. The projected demand for water is based on the amount of each land use developed on the project site. Based on the water consumption rates listed in Section IV.O.2 (Water) of this Draft EIR and considering the former hotel use, Alternative C would decrease water consumption on the project site by approximately 1,332 gpd (see Table VI-11, Alternative C Water Consumption).

**Table VI-11
Alternative C Water Consumption**

Land Use	Size	Consumption Rate^a	Total Water Consumption (gpd)
Office	250,000 sf	180 gallons/1,000 sf/day	45,000
Subtotal Alternative C			45,000
Former Hotel	- 297 rooms	156 gallons/room/day	-46,332
Total			-1,332
<i>Notes:</i> <i>du = dwelling unit; sf = square feet; gpd = gallons per day</i> ^a <i>Source: City of Los Angeles, Bureau of Engineering, August 2, 2005. Water consumption assumed to be 120% of wastewater generated for a given land use.</i>			

The implementation of the proposed project would result in the net decrease of approximately 6,756 gpd of water (see Section IV.O.2 (Water) of this Draft EIR). Similar to the proposed project, Alternative C would result in a decrease in the consumption of water on the project site. Therefore, there would be no

impact on water supply services under Alternative C, and water supply impacts would be greater than those associated with the proposed project.

Solid Waste

Alternative C would result in the development of a 250,000-square foot office building on the project site. The projected generation of solid waste is based on the amount of each land use developed on the project site. Based on the solid waste generation rates listed in Section IV.O.3 (Solid Waste) of this Draft EIR and considering the former hotel use, Alternative C would increase solid waste generation on the project site by approximately 906 pounds per day (see Table VI-12, Alternative C Solid Waste Generation).

**Table VI-12
Alternative C Solid Waste Generation**

Land Use	Size	Daily Generation Rate^a	Total Daily Solid Waste Generation (lbs)
Office	250,000 sf	6 lbs/1,000 sf/day	1,150
Subtotal Alternative C			1,150
Former Hotel	-297 rooms	2 lbs/room	-594
Total			906
<i>Notes:</i>			
<i>du=dwelling unit; lbs=pounds; sf=square feet</i>			
<i>^a Source: City of Los Angeles Bureau of Sanitation, Solid Waste Generation, 1981. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.</i>			

The implementation of the proposed project would result in a net increase of approximately 244 pounds per day of solid waste (see Section IV.O.3 (Solid Waste) of this Draft EIR). As compared to the proposed project, Alternative C would result in a greater increase in the generation of solid waste on the project site. However, as discussed in Section IV.O.3 (Solid Waste) of this Draft EIR, the Sunshine Canyon Landfill is permitted to receive 11,000 tons per day and currently receives 5,781 tons per day. Therefore, the Sunshine Canyon Landfill would have ample capacity to receive the additional 0.453 tons (906 pounds) per day of solid waste that would be generated by the operation of the office building under Alternative C. Therefore, the solid waste impact under Alternative C would be less than significant, and solid waste impacts would be greater than those associated with the proposed project.

Relationship to Project Objectives

Although the Office Building alternative would avoid several of the environmental impacts associated with the proposed project, it would increase several of the environmental impacts. Furthermore, the Office Building alternative would not satisfy all of the project objectives. Specifically, the Office Building alternative would not:

- Provide high-quality housing for local and area residents to meet existing and future needs of those desiring to live in Century City and to help alleviate the substantial housing shortage in the City; and
- Redevelop the former St. Regis Hotel property in a manner that is consistent with the trip allocations and development requirements in the Century City North Specific Plan;
- Create a high-quality development that promotes integrated urban living by offering residential amenities and services to complement and enhance the surrounding Century City community; and
- Provide luxury housing in close proximity to offices and retail land uses in Century City.

The Office Building alternative would meet the following project objectives:

- Provide an attractive and harmonious development in Century City, which takes into consideration the architectural character and the environmental setting of the area;
- Provide for the housing, commercial, or other service needs of the current and future residents of West Los Angeles;
- Redevelop the former St. Regis Hotel property with a financially viable development; and
- Create a landmark high-rise building that complements the character of the area through appropriate scale and design.

Reduction of Significant Project Impacts

Neither the proposed project nor this alternative would result in any significant impacts after mitigation.

D. REDUCED DENSITY ALTERNATIVE

Under this Reduced Density Alternative, the density of development on the project site would be reduced by approximately 25 percent. This would result in the demolition of the former hotel and the construction of 110 luxury residential condominium units, which is 37 units less than would be provided by the proposed project, with associated amenities in one high-rise structure. The resident-focused amenities under Alternative D would be similar to the proposed project; however, the amount of amenities would also be reduced by 25 percent. As such, Alternative D would include approximately 5,250 square feet of restaurant space and either (a) 20,250 square feet of resident-focused specialty uses or (b) a 32,250-square-foot private membership facility.

The proposed building under Alternative D would be approximately 30 stories and extend approximately 360 feet in height. The design and location of the proposed building under this alternative would be similar to the proposed project. Similar to the proposed project, approximately two acres of landscaped open space would be integrated into this alternative. Parking would be provided on several subterranean levels.

Aesthetics

Under Alternative D, a 360-foot-high oval-shaped high-rise residential building would be developed on the project site. The building that would be developed under this alternative would have a similar shape and orientation as the building under the proposed project, but would be approximately 120 feet shorter in height. The building under Alternative D would potentially shade adjacent sensitive uses (i.e., residences to the southwest and east of the project site) similar to the proposed project. It is anticipated that shadow lengths under Alternative D would extend up to approximately 1,172 feet during the winter solstice and up to approximately 525 feet during the summer solstice. It is anticipated that the shading that would occur under Alternative D would not cast shadows onto nearby residences during the winter solstice due to the northward orientation of the shadows (see Figure IV.B-1). Similar to the proposed project, the shading that would occur under Alternative D during the summer solstice may cast shadows upon the nearby residences to the east of the project site in the 5:00 P.M. hour. However, this eastward afternoon shadow during the summer solstice would be substantially shorter than the proposed project's summer solstice shadow depicted in Figure IV.B-2. For comparison, shadow lengths with the development of the proposed project would extend up approximately 1,587 feet during the winter solstice and up to approximately 694 feet during the summer solstice (see Figures IV.B-1 and IV.B-2). Therefore, shadow impacts under Alternative D would be less than significant, and would be less than those associated with the proposed project.

Similar to the proposed project, Alternative D would involve the development of a high-rise building and approximately two acres of landscaping and open space. With respect to impacts associated with light/glare, it is anticipated that the building materials that would be utilized with the development of the building under Alternative D would be similar to the proposed project, and would not result in any light/glare impacts. As the residential building under Alternative D would be approximately 25 percent

shorter in height than the proposed project, the impacts upon visual resources, including views, would be less than significant, and impacts would be less than those associated with the proposed project.

Air Quality

Construction activities under Alternative D would include the demolition of the existing hotel building and the development of 110 luxury residential condominium units and associated amenities. Peak daily construction activities under Alternative D would be similar to those associated with the proposed project. As such, construction-related daily emissions under Alternative D would not exceed SCAQMD significance thresholds for ROG, NO_x, CO, SO_x and PM₁₀ during the construction period. Therefore, the construction-related air quality impacts under Alternative B would be less than those associated with the proposed project.

When operational, it is estimated that Alternative D would generate approximately 2,195 daily trips, with 120 A.M. peak hour and 164 P.M. peak hour trips. Considering the daily trips generated by the former hotel, Alternative D would result in a net decrease of approximately 775 daily trips (2,195 – 2,970). As such, Alternative D would result in a net decrease in daily trips as compared to the proposed project. Similar to the proposed project, no intersections would be significantly impacted during either the A.M. or P.M. peak hour under Alternative D.

Because Alternative D would generate fewer average daily traffic trips than would be generated by the proposed project, Alternative D would generate fewer average daily emissions. The fewer motor vehicle trips under Alternative D would also result in less localized pollutant concentrations near local study intersections.

Overall, air quality impacts would be less than significant under Alternative D, and impacts would be less than those associated with the proposed project.

Biological Resources

Under Alternative D, landscaping would be provided throughout the project site. Similar to the proposed project, existing trees would be displaced and moved to different areas throughout the site. The amount of landscaped open space under this alternative would be similar to the proposed project. As discussed in Section IV.D (Biological Resources) of this Draft EIR, no rare, threatened, or endangered tree species currently on the project site. Also, the project site does not contain any locally designated natural habitat or plant community, wetland habitat, or wildlife movement/migration corridors. Therefore, impacts on biological resources would be less than significant, and impacts under Alternative D would be similar to the proposed project.

Cultural Resources

Two subterranean levels of parking would be developed under Alternative D. However, no excavation would occur below depths previously excavated during the development of the former hotel. Furthermore, the lateral extent of excavation associated with this alternative would not extend beyond the building footprint of the former hotel. Therefore, it is not anticipated that any previously unknown paleontological or archaeological resources would be encountered during excavation activities. As such, there would be no impact on paleontological or archaeological resources, and impacts under Alternative D would be less than those associated with the proposed project.

Energy Conservation

Electricity

Under Alternative D, the density of development on the project site would be reduced by approximately 25 percent. The projected demand for electricity supply is based on the amount of each land use developed on the project site. Based on the electricity generation rates listed in Section IV.F.1 (Electricity) of this Draft EIR and considering the former hotel use, Alternative D would decrease electricity consumption on the project site by approximately 6,592 kWh per day (see Table VI-13, Alternative D Electricity Consumption).

**Table VI-13
Alternative D Electricity Consumption**

Land Use	Size	Generation Rate ^a	Total Daily Electricity Consumption (kWh)
Condominiums	110 du	5,626.50 kWh/du/yr	1,696
Retail	32,250 sf ^b	13.55 kWh/sf/yr	1,197
Restaurant	5,250 sf	47.45 kWh/sf/yr	683
Subtotal Alternative D			3,576
Former Hotel	-373,000 sf	9.95 kWh/sf/yr	-10,168
Total			-6,592
<p><i>Notes:</i> <i>du = dwelling unit; sf = square feet; kWh = kilowatt hour; yr = year</i></p> <p>^a Source: SCAQMD, CEQA Air Quality Handbook, Table A9-11-A, 1993. ^b The proposed 32,250 sf of retail land uses is included in this table to represent a conservative estimate.</p>			

The implementation of the proposed project would result in the net decrease of approximately 5,396 kWh of electricity per day (see Section IV.F.1 (Electricity) of this Draft EIR). Similar to the proposed project, Alternative D would result in a decrease in the consumption of electricity on the project site. Therefore, there would be no impact on electricity services under Alternative D, and electricity impacts would be less than the proposed project.

Natural Gas

Under Alternative D, the density of development on the project site would be reduced by approximately 25 percent. The projected demand for natural gas supply is based on the amount of each land use developed on the project site. Based on the natural gas generation rates listed in Section IV.F.2 (Natural Gas) of this Draft EIR and considering the former hotel use, Alternative D would decrease natural gas consumption on the project site by approximately 41,345 cf per day (see Table VI-14, Alternative D Natural Gas Consumption).

**Table VI-14
Alternative D Natural Gas Consumption**

Land Use	Size	Generation Rate ^a	Total Daily Natural Gas Consumption (cf)
Condominiums	110 du	4,011.5 cf/du/mo	14,709
Retail	32,250 sf ^b	2.9 cf/sf/mo	3,118
Restaurant	5,250 sf	2.9 cf/sf/mo	508
Subtotal Alternative D			18,335
Former Hotel	-373,000 sf	4.8 cf/sf/mo	-59,680
Total			-41,345
<i>Notes:</i>			
<i>du = dwelling unit; sf = square feet; cf = cubic feet; yr = year</i>			
<i>^a Source: SCAQMD, CEQA Air Quality Handbook, Table A9-12-A, 1993.</i>			
<i>^b The proposed 32,250 sf of retail land uses is included in this table to represent a conservative estimate.</i>			

The implementation of the proposed project would result in the net decrease of approximately 35,190 cf of natural gas per day (see Section IV.F.2 (Natural Gas) of this Draft EIR). Similar to the proposed project, Alternative D would result in a decrease in the consumption of natural gas on the project site. Therefore, there would be no impact on natural gas services under Alternative C, and natural gas impacts would be less than the proposed project.

Geology and Soils

As the footprint of the proposed high-rise office building under Alternative D would be within the same general vicinity as the proposed project, the analysis presented in Section IV.G (Geology and Soils) in this Draft EIR would generally apply to Alternative D. However, the building proposed under Alternative D would likely require fewer subterranean parking levels than the proposed project. As such, less excavation would be needed under Alternative D when compared to the proposed project. Nonetheless, the same geological conditions and associated seismic risks would occur under Alternative D as the proposed project. Therefore, the geology and soils impacts under Alternative D would be less than significant and similar to the proposed project.

Hazards and Hazardous Materials

Similar to the proposed project, Alternative D would involve the development of a high-rise building on the same site as the proposed project. As discussed in Section IV.H (Hazards and Hazardous Materials) in this Draft EIR, impacts associated with hazards and hazardous materials would be reduced to a less-than-significant level with the implementation of mitigation measures. The mitigation measures that would be implemented with the proposed project would address potential impacts associated with the release of hazardous materials during construction activities. The same mitigation measures that would be implemented with the proposed project would also be implemented under Alternative D. Because development under Alternative D would occur in the same general location as the proposed project and the same mitigation measures would be implemented, the impacts associated with hazards and hazardous materials under Alternative D would be less than significant with mitigation and would be similar to the proposed project.

Land Use Planning

Alternative D would include the development of a high-rise structure with luxury condominiums. As indicated in Section IV.I (Land Use Planning) of this Draft EIR, the project site is currently zoned C2-2-O (Commercial, Height District No. 2, Oil Drilling District O). As set forth in the LAMC 12.14, allowable uses in the C2 zone include uses allowed in the C1 zone (i.e., office, business or professional, bakery, stationery store, drug store, grocery store, etc.); uses allowed in the C1.5 zone (i.e., auditorium, broadcasting studio, department store, museum, theater, etc.); more extensive retail stores (i.e. pet stores, carpenter, upholstering shop, tire shop, restaurants, etc.); and uses allowed in the R4 zone (i.e. multiple-family dwelling units).

Similar to the proposed project, Alternative D does not include any proposed changes to the existing zoning and land use designations for the project site. Similar to the proposed project, Alternative D would be consistent with the Century City North Specific Plan. Therefore, there would be a less-than-significant impact with respect to consistency with land use planning under Alternative D.

Regarding community division, this alternative would be developed on the same project site as the proposed project. Similar to the proposed project, this alternative would not physically divide an established community.

Mineral Resources

As discussed in Section IV.J (Mineral Resources) of this Draft EIR, the project site is located in the Beverly Hills Oilfield. Although the project site is zoned for oil and mineral extraction activities, the site does not contain oil wells nor does it currently conduct mineral extraction activities. As the footprint of the proposed high-rise condominium building under Alternative D would be within the same general vicinity as the proposed project, the analysis presented in Section IV.J (Mineral Resources) in this Draft EIR would generally apply to Alternative D. Therefore, impacts on mineral resources under Alternative

D would be less than significant, and impacts would be similar to those associated with the proposed project.

Noise

Demolition activities under Alternative D would be similar to the proposed project. However, construction activities under Alternative D would be less than those associated with the proposed project because Alternative D would involve the construction of less Floor Area than the proposed project. Similar to the proposed project, construction under Alternative D would cause a substantial temporary increase in ambient noise levels in the project vicinity above existing levels. This would result in a significant, albeit temporary, noise impact. However, the number of days that noise levels are generated over the entire construction period would be less under Alternatives E as compared to the proposed project due to the reduced amount of Floor Area.

Groundborne vibration velocity levels generated during the construction of this alternative would be similar to those generated by the construction of the proposed project. As such, they would not exceed the threshold of significance for residences and buildings where people normally sleep and would be limited to daytime hours in accordance with City policies, and would not result in a significant impact. As with the construction noise levels, the number of days that groundborne vibration is generated over the entire construction period would be less under Alternative D as compared to the proposed project due to the reduced amount of Floor Area.

When operational, Alternative D would result in a decrease in the amount of human activity at the project site as compared to the proposed project. As such, noise levels from the onsite activities would not be expected to exceed City thresholds for outdoor or interior living spaces. Therefore, operational noise levels under Alternative D would result in temporary or periodic increases in noise levels that are similar to those associated with the proposed project.

Alternative D would generate less average daily traffic trips than those generated by the proposed project. Therefore, Alternative D would result in a less-than-significant impact with respect to offsite traffic noise, and this impact would be less than that associated with the proposed project.

Population and Housing

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. Similar to the proposed project, this alternative would not result in the displacement of any existing residences or people. Based on an estimate of one resident per bedroom, Alternative D is expected to result in 110 new residences, and approximately 293 residents on the project site (see Table VI-15, Alternative D Residential Population).

**Table VI-15
Alternative D Residential Population**

Bedrooms	Units	Population (persons)
2	45	90
3	57	171
4	8	32
Total	110	293

Source: Christopher A. Joseph & Associates, September 2005.

In addition, Alternative D would result in indirect population and a demand for housing, associated with the retail and restaurant land uses. Alternative D would include up to 37,500 square feet of commercial land uses. This would include 5,250 square feet of restaurant uses and either (a) 20,250 square feet of resident-focused specialty retail uses or (b) 32,250 square feet of private membership facility uses. As Alternative D would result in the development of approximately 25 percent fewer land uses on the project site than the proposed project, it is anticipated that this alternative would proportionally decrease the number of employees. Therefore, it is expected that Alternative D would result in the generation of approximately 60 employees on the project site. Considering the employment of the former hotel (282 jobs), the implementation of Alternative D would be expected to result in the net decrease of 222 jobs ($60 - 282 = -222$). Based upon this net decrease in jobs, Alternative D would not indirectly result in the demand for any new housing units within West Los Angeles.

Comparatively, the proposed project would result in the generation of 147 new residences, approximately 392 new residents, and 80 employees on the project site. Therefore, population and housing impacts under Alternative D would be less than significant, and would be less than those associated with the proposed project.

Public Services

Fire Protection

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. As Alternative D would result in the development of approximately 25 percent fewer land uses on the project site than the proposed project, it is anticipated that this alternative would proportionally decrease the number of employees. Therefore, it is expected that Alternative D would result in the generation of approximately 60 employees on the project site. Considering the employment of the former hotel (282 jobs), the implementation of Alternative D would be expected to result in the net decrease of 222 jobs ($60 - 282 = -222$). Based on an estimate of one resident per bedroom, Alternative D is expected to result in 110 new residences, and approximately 293 residents on the project site (see Table VI-15, Alternative D Residential Population). In addition, it is estimated that the average daily total number of former hotel guests (i.e., non-residents and non-

employees) was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). As discussed above, there would be an increase of approximately 293 residents and a decrease of 222 employees on the site on a daily basis under Alternative D. Thus, the daily onsite population under Alternative D would be greater than that associated with the proposed project.

Comparatively, the proposed project would result in the generation of 147 new residences, approximately 392 new residents, and 80 employees on the project site. Therefore, Alternative D would have a less-than-significant impact on fire protection services, and impacts would be less than those associated with the proposed project.

Police Protection

Development under this alternative would occur on the same project site as the proposed project. Currently, the project site contains the former hotel. As Alternative D would result in the development of approximately 25 percent fewer land uses on the project site than the proposed project, it is anticipated that this alternative would proportionally decrease the number of employees. Therefore, it is expected that Alternative D would result in the generation of approximately 60 employees on the project site. Considering the employment of the former hotel (282 jobs), the implementation of Alternative D would be expected to result in the net decrease of 222 jobs ($60 - 282 = -222$). Based on an estimate of one resident per bedroom, Alternative D is expected to result in 110 new residences, and approximately 293 residents on the project site (see Table VI-15, Alternative D Residential Population). In addition, it is estimated that the average daily total number of former hotel guests (i.e., non-residents and non-employees) was approximately 334 persons (297 rooms x 1.5 persons per room x 70% occupancy). As discussed above, there would be an increase of approximately 293 residents and a decrease of 222 employees on the site on a daily basis under Alternative D. Thus, the daily onsite population under Alternative D would be greater than that associated with the proposed project.

Comparatively, the proposed project would result in the generation of 147 new residences, approximately 392 new residents, and 80 employees on the project site. Therefore, Alternative D would have a less-than-significant impact on police protection services, and impacts would be less than those associated with the proposed project.

Schools

Under Alternative D, the density of development on the project site would be reduced by approximately 25 percent. The projected student population is based on the type of each land use developed on the project site. Based on the student generation rates listed in Section IV.M.3 (Schools) of this Draft EIR and considering the former hotel use, Alternative D would increase student generation on the project site by approximately three students (see Table VI-16, Estimated Student Generation by Alternative D).

Based on the number of students generated in Section IV.M.3 (Schools) of this Draft EIR, a net increase of approximately three elementary students, two middle school students, and three high school students

(approximately eight students total) would be generated by development of the proposed project. Alternative D would result in a decrease in the generation of students on the project site when compared to the proposed project. Therefore, school impacts under Alternative D would be less than significant, and impacts would be less than those associated with the proposed project.

**Table VI-16
Estimated Student Generation by Alternative D**

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Existing					
Hotel ^a	373,000 sf (297 rms)	3	1	1	5
Alternative D					
Total Condominiums ^b	110 du				
Two-Bedroom	45 du	1	1	1	3
Three-Bedroom	57 du	2	1	2	5
Four-Bedroom	8 du	0	0	0	0
Retail ^c	32,250 sf	0	0	0	0
Restaurant ^c	5,250 sf	0	0	0	0
Alternative D Total		3	1	3	7
Less Existing Total		3	1	1	5
Net Alternative D Total		0	0	2	2
^c Note: du=dwelling unit; sf=square feet; rm=room. ^a Student generation rates are as follows for hotel land uses: 0.0076 elementary, 0.0035 middle and 0.0034 high school students per 1,000 square feet. Los Angeles Unified School District, School District Fee Justification Study, September 2002. ^b Student generation rates are as follows for two-bedroom multi-family residential units: 0.026 elementary (K-5), 0.02 middle (6-8) and 0.027 high school (9-12) students per dwelling unit. Student generation rates are as follows for three- or more bedroom multi-family residential units: 0.043 elementary (K-5), 0.02 middle (6-8) and 0.027 high school (9-12) students per dwelling unit. Written correspondence from Mary Prichard, Senior Boundary Coordinator, Master Planning and Demographics, Los Angeles Unified School District, August 4, 2005. ^c Student generation rates are as follows for retail and service land uses: 0.0149 elementary, 0.0069 middle and 0.0067 high school students per 1,000 square feet. Los Angeles Unified School District, School District Fee Justification Study, September 2002. Source: Christopher A. Joseph & Associates, September 2005.					

Recreation and Parks

Under Alternative D, the density of development on the project site would be reduced by approximately 25 percent. Based on an estimate of one resident per bedroom, Alternative D is expected to result in 110 new residences, and approximately 293 residents on the project site (see Table VI-15, Alternative D Residential Population). Therefore, based on the City parkland-to-resident ratio, Alternative D would generate a need for 1.17 (293 x 4/1,000) acres of public parkland in the project area. The proposed project would result in a demand for approximately 1.57 acres of public parkland or recreational facilities.

Therefore, impacts on recreational facilities or parks would be less than significant under Alternative D, and impacts would be less than those associated with the proposed project.

Libraries

Under Alternative D, the density of development on the project site would be reduced by approximately 25 percent. Based on an estimate of one resident per bedroom, Alternative D is expected to result in 110 new residences, and approximately 293 residents on the project site (see Table VI-15, Alternative D Residential Population). Therefore, based on the State of California standards, the proposed project would generate need for approximately 147 square feet (293 x 0.5) of library space. The proposed project would generate need for approximately 196 square feet of library space. Therefore, impacts on library facilities would be less than significant under Alternative D, and impacts would be less than those associated with the proposed project.

Transportation and Traffic

It is estimated that Alternative D would generate up to approximately 2,195 daily trips, with 120 A.M. peak hour and 164 P.M. peak hour trips. Considering the daily trips generated by the former hotel, Alternative D would result in a net decrease of approximately 775 daily trips (2,195 – 2,970). As such, Alternative D would result in a net decrease in daily trips as compared to the proposed project. Similar to the proposed project, no intersections would be significantly impacted during either the A.M. or P.M. peak hour under Alternative D. Therefore, no traffic impacts would occur under Alternative D, and impacts would be less than those associated with the proposed project.

Utilities and Service Systems

Wastewater

Under Alternative D, the density of development on the project site would be reduced by approximately 25 percent. The projected generation of wastewater is based on the amount of each land use developed on the project site. Based on the wastewater generation rates listed in Section IV.O.1 (Wastewater) of this Draft EIR and considering the former hotel use, Alternative D would decrease wastewater generation on the project site by approximately 13,935 gpd (see Table VI-17, Alternative D Wastewater Generation).

**Table VI-17
Alternative D Wastewater Generation**

Land Use	Size	Generation Rate^a	Total Wastewater Generation (gpd)
2-bedroom Condominiums	45 units	160 gallons/du/day	7,200
3-bedroom Condominiums	57 units	200 gallons/du/day	11,400
4-bedroom Condominiums	8 units	240 gallons/du/day	1,920
Retail	32,250 sf ^b	80 gallons/1,000 sf/day	2,580
Restaurant	5,250 sf	300 gallons/1,000 sf/day	1,575
Subtotal Alternative D			24,675
Former Hotel	-297 rooms	130 gallons/room/day	-38,610
Total			-13,935
<i>Notes:</i> <i>du = dwelling unit; sf = square feet; gpd = gallons per day</i>			
<i>^a Source: City of Los Angeles, Bureau of Engineering, August 2, 2005.</i>			
<i>^b The proposed 32,250 sf of retail land uses is included in this table to represent a conservative estimate.</i>			

The implementation of the proposed project would result in the net decrease of approximately 5,630 gpd of wastewater (see Section IV.O.1 (Wastewater) of this Draft EIR). Similar to the proposed project, Alternative D would result in a decrease in the generation of wastewater on the project site. Therefore, there would be no impact on wastewater services under Alternative D, and wastewater impacts would be less than those associated with the proposed project.

Water Supply

Under Alternative D, the density of development on the project site would be reduced by approximately 25 percent. The projected demand for water is based on the amount of each land use developed on the project site. Based on the water consumption rates listed in Section IV.O.2 (Water) of this Draft EIR and considering the former hotel use, Alternative D would decrease water consumption on the project site by approximately 16,722 gpd (see Table VI-18, Alternative D Water Consumption).

The implementation of the proposed project would result in the net decrease of approximately 6,756 gpd of water (see Section IV.O.2 (Water) of this Draft EIR). Similar to the proposed project, Alternative D would result in a decrease in the consumption of water on the project site. Therefore, there would be no impact on water supply services under Alternative D, and water supply impacts would be less than those associated with the proposed project.

**Table VI-18
Alternative D Water Consumption**

Land Use	Size	Consumption Rate ^a	Total Water Consumption (gpd)
2-bedroom Condominiums	45 units	192 gallons/du/day	8,640
3-bedroom Condominiums	57 units	240 gallons/du/day	13,680
4-bedroom Condominiums	8 units	288 gallons/du/day	2,304
Retail	32,250 sf ^b	96 gallons/1,000 sf/day	3,096
Restaurant	5,250 sf	360 gallons/1,000 sf/day	1,890
Subtotal Alternative D			29,610
Former Hotel	- 297 rooms	156 gallons/room/day	-46,332
Total			-16,722
<i>Notes:</i> <i>du = dwelling unit; sf = square feet; gpd = gallons per day</i>			
<i>^a Source: City of Los Angeles, Bureau of Engineering, August 2, 2005. Water consumption assumed to be 120% of wastewater generated for a given land use.</i>			
<i>^b The proposed 32,250 sf of retail land uses is included in this table to represent a conservative estimate.</i>			

Solid Waste

Under Alternative D, the density of development on the project site would be reduced by approximately 25 percent. The projected generation of solid waste is based on the amount of each land use developed on the project site. Based on the solid waste generation rates listed in Section IV.O.3 (Solid Waste) of this Draft EIR and considering the former hotel use, Alternative D would increase solid waste generation on the project site by approximately 33 pounds per day (see Table VI-19, Alternative D Solid Waste Generation).

**Table VI-19
Alternative D Solid Waste Generation**

Land Use	Size	Daily Generation Rate ^a	Total Daily Solid Waste Generation (lbs)
Condominiums	110 du	4 lbs/unit	440
Retail	32,250 sf ^b	5 lbs/1,000 sf	161
Restaurant	5,250 sf	5 lbs/1,000 sf	26
Subtotal Alternative D			627
Former Hotel	-297 rooms	2 lbs/room	-594
Total			33
<i>Notes:</i> <i>du=dwelling unit; lbs=pounds; sf=square feet</i>			
<i>^a Source: City of Los Angeles Bureau of Sanitation, Solid Waste Generation, 1981. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.</i>			
<i>^b The proposed 32,250 sf of retail land uses is included in this table to represent a conservative estimate.</i>			

The implementation of the proposed project would result in the net increase of approximately 244 pounds per day of solid waste (see Section IV.O.3 (Solid Waste) of this Draft EIR). Compared to the proposed project, Alternative D would result in a decrease in the generation of solid waste on the project site. As discussed in Section IV.O.3 (Solid Waste) of this Draft EIR, the proposed project would result in a less-than-significant impact on solid waste services. Therefore, there would be a less-than-significant impact on solid waste services under Alternative D, and solid waste impacts would be less than those associated with the proposed project.

Relationship to Project Objectives

Although the Reduced Density Alternative would avoid most of the environmental impacts associated with the proposed project, it would not satisfy all of the project objectives. Specifically, the Reduced Density Alternative would not:

- Create a landmark high-rise building that complements the character of the area through appropriate scale and design; and
- Redevelop the former St. Regis Hotel property with a financially viable development.

The Reduced Density Alternative would satisfy many of the project objectives to a lesser extent than the proposed project. The Reduced Density alternative would meet the following project objectives to a lesser extent than the proposed project:

- Provide an attractive and harmonious development in Century City, which takes into consideration the architectural character and the environmental setting of the area;
- Provide high-quality housing for local and area residents to meet existing and future needs of those desiring to live in Century City and to help alleviate the substantial housing shortage in the City;
- Provide for the housing, commercial, or other service needs of the current and future residents of West Los Angeles;
- Redevelop the former St. Regis Hotel property in a manner that is consistent with the trip allocations and development requirements in the Century City North Specific Plan;
- Create a high-quality development that promotes integrated urban living by offering residential amenities and services to complement and enhance the surrounding Century City community; and
- Provide luxury housing in close proximity to offices and retail land uses in Century City.

Reduction of Significant Project Impacts

Neither the proposed project nor this alternative would result in any significant impacts after mitigation.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of a proposed project and the alternatives, Section 15126.6 of the State 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 fewest adverse impacts. Based on the alternatives analysis provided above and in Table VI-20, Alternatives Comparison, the Reduced Density alternative (Alternative D) would result in the fewest adverse impacts and, therefore, is considered to be the environmentally superior alternative. Most importantly, as the height of the condominium structure under Alternative D would be 25 percent shorter than the proposed project, Alternative D would decrease the visual resources and shade/shadow impacts experienced by the surrounding communities. In addition, as Alternative D would only be comprised of 110 residential units, there would be less traffic, air, noise, energy, public services, and utilities impacts associated with the residents living onsite. Impacts to geology and soils would also be less under this Alternative, as fewer residents would be subject to seismic shaking. Lastly, cultural resources impacts would also be less than the proposed project because less grading and excavation would occur under Alternative D. However, as previously discussed, Alternative D would not satisfy the project objectives as fully as the proposed project.

**Table VI-20
Alternatives Comparison**

Impact Area	Proposed Project Impact With Mitigation	Alternative A: No Project	Alternative B: Entertainment Complex	Alternative C: Office Building	Alternative D: Reduced Density
Aesthetics Shade/Shadow Light and Glare Visual Character	Less Than Significant Less Than Significant Less Than Significant	Less Less Less	Less Less Similar	Less Similar Less	Less Similar Less
Air Quality	Less Than Significant	Less	Greater	Less (Construction) Greater (Operation)	Less
Biological Resources	Less Than Significant	Less	Greater	Similar	Similar
Cultural Resources Paleontological Archaeological	Less Than Significant Less Than Significant	Less Less	Similar Similar	Less Less	Less Less
Energy Conservation Electricity Natural Gas	Less Than Significant Less Than Significant	Greater Greater	Less Less	Greater Less	Less Less
Geology and Soils	Less Than Significant	Less	Greater	Similar	Less
Hazards and Hazardous Materials	Less Than Significant	Less	Similar	Similar	Similar
Land Use Planning	Less Than Significant	Similar	Similar	Similar	Similar
Mineral Resources	Less Than Significant	Less	Similar	Similar	Similar
Noise	Less Than Significant	Less	Less	Similar	Less
Population and Housing	Less Than Significant	Greater	Less	Greater	Less

**Table VI-20 (Continued)
Alternatives Comparison**

Impact Area	Proposed Project Impact With Mitigation	Alternative A: No Project	Alternative B: Entertainment Complex	Alternative C: Office Building	Alternative D: Reduced Density
Public Services	Less Than Significant	Less	Greater	Greater	Less
Fire Protection	Less Than Significant	Less	Greater	Greater	Less
Police Protection	Less Than Significant	Less	Less	Less	Less
Schools	Less Than Significant	Less	Less	Less	Less
Recreation and Parks	Less Than Significant	Less	Less	Less	Less
Libraries	Less Than Significant	Less	Less	Less	Less
Transportation and Traffic	Less Than Significant	Similar	Greater	Greater	Less
Utilities and Service Systems					
Wastewater	No Impact	Greater	Less	Greater	Less
Water Supply	No Impact	Greater	Less	Greater	Less
Solid Waste	Less Than Significant	Less	Less	Greater	Less
<i>Less: Impacts of the alternative are less as compared to the proposed project.</i> <i>Similar: Impacts of the alternative are similar as compared to the proposed project.</i> <i>Greater: Impacts of the alternative are greater as compared to the proposed project.</i>					