
VI. ALTERNATIVES TO THE PROPOSED PROJECT

CEQA Guidelines require that an EIR include the identification and evaluation of a reasonable range of alternatives that are designed to reduce the significant environmental impacts of the proposed project, while still satisfying the project's objectives. The CEQA Guidelines also set forth the intent and extent of the alternatives analysis that must be provided in an EIR.

Alternatives to the Proposed Project

Section 15126.6(a) of the CEQA Guidelines states:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Purpose

Section 15126.6(b) of the CEQA Guidelines states:

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

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the CEQA Guidelines states:

The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should

also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Level of Detail

The CEQA Guidelines do not require the same level of detail in the alternatives analysis as in the analysis of the proposed project. Section 15126.6(d) of the CEQA Guidelines states:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

Project Objectives

The primary objective of the proposed project is to provide an upscale multi-family residential use in the Westwood area that is compatible with the surrounding community. More specifically, the applicant's objectives for the proposed project include:

- to develop the site with the 35 permitted residential condominium units in a 21-story high-rise, as permitted under Tentative Tract Map (TTM) 27025 which was recorded on October 31, 1979;
- to promote an orderly, attractive and harmonious residential development in a multi-residential area of the Westwood Community, which takes into consideration the architectural character and the environmental setting of the area;
- to provide employment opportunities through the construction of the proposed project; and
- to provide additional housing to the Westwood Community area.

Overview of Selected Alternatives

The alternatives to be analyzed in comparison to the proposed project include the following:

Alternative A: No Project Alternative

Alternative B: Reduced Density Alternative

Alternative C: Wilshire-Westwood Specific Plan Consistency Alternative

Alternatives Rejected as Being Infeasible

The range of alternatives was structured to analyze alternatives which would meet the project objectives. In addition to Alternatives A through C listed above, two other alternatives were considered and rejected by the City:

- **Ingress access to the project site via Wilshire Boulevard.** This alternative would have included the dedication of a sufficient amount of property on the north side of Wilshire Boulevard for the addition of one or two more lanes, and would have created a drive-up circle so the ingress and egress for the proposed project could be on Wilshire Boulevard verses Comstock Avenue and Club View Drive. Wilshire Boulevard is designated as a major highway. As such, with the heavy traffic flow experienced on Wilshire Boulevard due to its status as a major thoroughfare between West Los Angeles and Downtown Los Angeles, it would not be feasible or safe to provide ingress and egress to the project site from this arterial, nor would it be allowed by tract map conditions and the LADOT.
- **Purchasing the Los Angeles Country Club maintenance yard and including it as part of the project site.** This alternative, which would have purchased the Los Angeles Country Club maintenance yard and used it as an additional ingress/egress point to provide additional access to the project site for delivery trucks, trash trucks, and other services, was rejected. The land is owned by the City of Los Angeles. Also, this alternative is not consistent with the approved Tract Map. Furthermore, the site is zoned as A1-1XL (Agricultural), which is not compatible with the proposed residential development.
- **Alternative Sites.** Alternative sites for the proposed project were not analyzed as the project applicant does not own or control other property within the City of Los Angeles that satisfies the objectives for the proposed project.

Assumptions and Methodology

The anticipated means for implementing 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. 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 significance associated with the proposed project.

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

VI. ALTERNATIVES TO THE PROPOSED PROJECT

A. NO PROJECT ALTERNATIVE

As required by CEQA, a No Project Alternative (“Alternative A”) is analyzed below. Under the No Project Alternative, the proposed project would not be constructed and the project site would remain undeveloped. 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.

Regarding the No Project Alternative, Section 15126.6(e)(2) of the CEQA Guidelines states:

. . . analysis shall discuss the existing conditions at the time the notice of preparation is published . . . as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.

Furthermore, Section 15126.6(e)(3)(B) of the CEQA Guidelines states:

If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this ‘no project’ consequence should be discussed. In certain instances, the no project alternative means ‘no build’ wherein the existing environmental setting is maintained. However, where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project’s non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment.

Aesthetics and Shade/Shadow

The project site is currently undeveloped. Under Alternative A, views toward and from the project site would not be altered, and no new shade or shadows would be generated that could affect the surrounding areas. Therefore, impacts on visual resources, shade and shadows associated with Alternative A would be less than significant. In addition, the impacts associated with Alternative A would be less than 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 (i.e., PM₁₀, CO and NO_x) related to grading,

construction, or mobile trips would be generated under this alternative. Therefore, no air quality impacts would occur under Alternative A. Since the proposed project would have less-than-significant air quality impacts, impacts under Alternative A would be less than those associated with the proposed project.

Geology and Soils

Under Alternative A, no grading or excavation would take place. Therefore, the geology and soils impacts from grading and excavation of the project site would not occur. In addition, no people or structures would be exposed to geotechnical hazards under this alternative. As such, the geology and soils impacts associated with Alternative A would be less than significant and less than those associated with the proposed project.

Hydrology

New impermeable surfaces (e.g., buildings and roads) would not be constructed and no grading would occur under this alternative. Therefore, surface hydrology and water quality impacts associated with the Alternative A would be less than significant and less than those associated with the proposed project.

Land Use

Under Alternative A, the project site would remain undeveloped and would not conflict with general plan land use or zoning designations for the site. Although the proposed project's land use impacts are considered to be less than significant, land use impacts under Alternative A would be less than those associated with the proposed project.

Noise

Alternative A would not involve any grading, construction, or haul trucks. Therefore, noise impacts that are typically associated with grading, construction, and haul trucks would not occur under this alternative. While noise generated by traffic would occur with the long-term occupancy of the proposed project, no new noise associated with increased traffic would be generated by Alternative A. Likewise, since no residential uses would be constructed under Alternative A, there would be no increase in noise levels typically associated with the long-term occupancy of the proposed facilities. As such, noise impacts under Alternative A would be less than significant and less than those associated with the proposed project.

Traffic/Transportation

Alternative A would not generate any new vehicle trips because it does not involve any new development. Conversely, the proposed project would generate 15 trips during the AM peak hour and 19 trips during the PM peak hour. However, no significant traffic impacts would occur under the proposed project and no mitigation measures are required. In any event, transportation/traffic impacts under this alternative would be less than significant and less than those associated with the proposed project.

Relationship to Project Objectives

Although Alternative A would not cause any significant environmental impacts, it would not satisfy the project objectives stated above because no development would occur on the project site. Specifically, the Alternative A would not build the site out with the maximum allotted number of residential units.

Reduction of Significant Project Impacts

With implementation of the recommended mitigation measures, the proposed project would not result in any significant environmental impacts, except for short-term construction noise impacts. Construction of Alternative A would also not result in any significant environmental impacts associated with its development.

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B. REDUCED DENSITY ALTERNATIVE

The Reduced Density Alternative (“Alternative B”) involves the development of a residential high-rise building containing 26 condominium units (compared to the proposed project’s 35 condominium units). This constitutes a 25 percent reduction of residential units in comparison to the proposed project. The height of the building would also be reduced to 226 feet (compared to 301 feet), with a total floor area of 151,962 square feet (compared to 202,616 square feet). Two and one half levels of subterranean parking would also be provided at the project site.

Aesthetics and Shade/Shadow

The project site is currently undeveloped. Under Alternative B, views toward and from the project site would be altered. However, the number of units for this alternative and the height of the building have both been reduced by 25 percent. Consequently, the building under this alternative would be approximately 226 feet in height, which is 75 feet shorter than the proposed project. Under the proposed project, a less-than-significant impact would occur. Therefore, the Reduced Density Alternative would have a less than significant impact upon visual resources, shade, and shadows and impacts would be less than those associated with the proposed project.

Air Quality

Because the same grading plan would be utilized for both Alternative B and the proposed project, the construction-related vehicle and dust emissions generated during the grading phase would essentially be the same. Under full project occupancy, there would be approximately 26 percent less peak traffic trips (14 peak hour trips) generated under this alternative than under the proposed project (19 peak hour trips). Consequently, vehicular emissions under Alternative B would also be reduced by approximately 26 percent. Under the proposed project, a less than significant air quality impact would occur. As Alternative B proposes fewer condominium units and associated vehicles trips, the air quality impacts under this alternative would also be less than significant, but would also be less than the proposed project.

Geology and Soils

There would be a 25 percent decrease in the amount of condominiums under this alternative, and consequently, a 25 percent decrease in the amount of parking spaces that would be required. As such, under Alternative B, only two and one half subterranean levels of parking would be included on the project site, compared to the three levels needed by the proposed project. However, the geotechnical conditions encountered under the proposed project and Alternative B would be the same. As such, this

difference in the amount of parking levels is minimal, but the grading footprint under Alternative B would be slightly less than under the proposed project. Assuming the same level of mitigation and compliance with Building Code requirements, impacts related to geology and soils for both Alternative B and the proposed project would be comparably reduced to a less than significant level. In addition, because of its reduced residential density, fewer people would be exposed to geotechnical hazards under Alternative B than under the proposed project. Overall, geology and soils impacts experienced by Alternative B would be less than under the proposed project and also insignificant.

Hydrology

Because the grading plan and building pad design are essentially the same for both Alternative B and the proposed project, the same dewatering activities would be utilized for both alternatives. However, as Alternative B would necessitate the need for only two and one half levels of subterranean parking, less impact upon geology and soils would occur under this alternative than under the proposed project. In addition, implementation of BMPs for both the construction and operational phases would ensure that Alternative B and the proposed project would not generate significant water quality impacts. As such, Alternative B would provide the same water quality BMPs as the proposed project. Overall, the resulting hydrology and water quality impacts from Alternative B would be less than under the proposed project and also insignificant.

Land Use

Similar to the proposed project land use, the land use proposed under Alternative B is consistent with the zoning and General Plan land use designations for the project site. Alternative B would also be compatible with surrounding land uses, and would be consistent with all applicable land use policies. Therefore, impacts under Alternative B and the proposed project would be similar and insignificant.

Noise

Under Alternative B, short-term noise impacts during grading and construction would be slightly less as compared to the proposed project because Alternative B would include 151,962 square feet of construction, or 50,654 square feet less than the proposed project. However, since Alternative B would use the same type of construction equipment, it would also result in significant short-term construction noise impacts. In addition, Alternative B would generate fewer vehicle trips per day than the proposed project; thus, long-term automobile-related noise impacts would also be less than the proposed project and also insignificant.

Traffic/Transportation

As Alternative B would involve the construction of 25 percent fewer condominium units, fewer residents would live on-site. Therefore, Alternative B would generate fewer vehicle trips. Alternative B would generate 14 peak hour trips compared to the proposed project's 19 peak hour trips. Therefore, traffic impacts to local roadway segments and intersections would be slightly less under this alternative than under the proposed project and also insignificant.

Relationship to Project Objectives

Although Alternative B would not create any significant environmental impacts, it would not satisfy the project objectives as fully as the proposed project, because fewer condominiums would be constructed on the project site. Specifically, Alternative B would not build the site out with the permitted number of residential units, would generate fewer construction jobs and would not provide as much additional housing in the Westwood Community Area.

Reduction of Significant Project Impacts

With implementation of the recommended mitigation measures, the proposed project would not result in any significant environmental impacts, except for short-term construction noise impacts. Similar to the proposed project, with implementation of the recommended mitigation measures, construction of Alternative B would not result in any significant environmental impacts associated with its development, except for short-term construction noise impacts.

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C. WILSHIRE-WESTWOOD SCENIC CORRIDOR

CONSISTENCY ALTERNATIVE

Alternative C would develop the project site according to the current Wilshire-Westwood Scenic Corridor Specific Plan guidelines. On June 29, 1977, the Los Angeles City Planning Department issued a Conditional Negative Declaration (CND) for a condominium project at 10250 West Wilshire Boulevard (CND-213-77-SUB). The Tentative Tract Map (TTM) was recorded on October 31, 1979. Although the proposed project is within the Corridor Specific Plan area, it is exempted from the Corridor Specific Plan's provisions. If a tract map application for a project was filed between July 25, 1972 and June 5, 1980, the project is exempt from the Corridor Specific Plan pursuant to Ordinance 155,044, Section 14.A of that plan. The Tract Map application for the proposed project was filed in 1977. Thus, the proposed project is exempt from the provisions of the Corridor Specific Plan. Under this Wilshire-Westwood Scenic Corridor Consistency Alternative, the design of the proposed project would be compatible with the applicable guidelines as set forth in the Specific Plan. Under Alternative C, the project site would be developed with a six-story building (75 feet) comprised of 57 condominiums, providing 143 parking spaces within four and one half levels of subterranean parking. In addition, approximately 58,000 cubic yards of dirt would be removed from the project site.

Aesthetics and Shade/Shadow

The project site is currently undeveloped. Under Alternative C, views toward and from the project site would be altered. Under this alternative, the condominium building would be six stories in height, approximately 15 stories less than the proposed project. The proposed project would have a less than-significant impact upon visual resources, shade, and shadows. As the condominium building under Alternative C is 15 stories less than the proposed project, the impacts upon visual resources, shade, and shadows under this alternative would also be less than significant and less than those associated with the proposed project.

Air Quality

The same basic grading plan would be utilized for Alternative C as for the proposed project. However, Alternative C would include four and one half levels of parking, compared to the proposed project's three levels of parking. As such, these two differences in project design would cause construction-related vehicle and dust emissions generated during the grading phase of Alternative C to be slightly greater than the proposed project. In addition, due to the additional 22 condominiums under Alternative C, the number of vehicle trips generated by residents would be greater, creating more

vehicle emissions. Overall, air quality impacts under Alternative C would be greater than under the proposed project.

Geology and Soils

Alternative C proposes approximately 40 percent more parking spaces compared to the proposed project, and, as such, would require four and one half levels of subterranean parking. Therefore, the grading footprint under Alternative C would be larger than the proposed project. Even though geotechnical conditions encountered would also be the same with development of either the proposed project or Alternative C, the deeper excavations of Alternative C would cause more impacts to geology and soils due to the low level of groundwater at the project site. Assuming the same level of mitigation and compliance with Building Code requirements, impacts related to geology and soils for both Alternative C and the proposed project would be comparably reduced to a less than significant level. However, because of its increased residential density and deeper excavations, more people and structures would be exposed to geotechnical hazards under Alternative C than under the proposed project. Therefore, the geology and soils impact under Alternative C would be greater than under the proposed project.

Hydrology

Alternative C proposes approximately 40 percent more parking spaces compared to the proposed project, and, as such, would require four and one half levels of subterranean parking and implementation of more dewatering activities. The deeper excavations of Alternative C would cause greater impacts to hydrology due to the low level of groundwater at the project site. In addition, implementation of BMPs for both the construction and operational phases would ensure that Alternative C and the proposed project would not generate significant water quality impacts. As such, Alternative C would provide the same water quality BMPs as the proposed project. Overall, due to the need of an extra level and half of subterranean parking in comparison to the proposed project, the impacts to hydrology under Alternative C would be greater than the proposed project.

Land Use

As stated above, in order for Alternative C to be constructed, the TTM that was approved for the project site in 1979 would be discarded (see Section IV.F (Land Use) for further discussion). As such, Alternative C would conform to the provisions outlined in the Wilshire-Westwood Specific Plan ("Specific Plan"). The land use designation for the project site, as established by the Westwood Community Plan, is High Multi-Family Residential, which allows development of 163.5 multi-family

dwelling units per acre.¹ Based on this density allowed under the land use designation, the maximum number of multi-family units that could be developed on the project site would be approximately 93 units. The Specific Plan allows a density of 100 dwelling units per acre of lot area, which would allow a maximum of 57 units on the site. As Alternative C consists of 57 units it would be consistent with the Community Plan land use designation and the Specific Plan density requirements. Therefore, a less than significant impact under Alternative C would occur and land use impacts would be similar under Alternative C, when compared to the proposed project.

Noise

Under Alternative C, short-term noise impacts during grading and construction would be the slightly more compared to the proposed project because, while this alternative requires the same amount of grading on-site, it would construct 22 additional condominium units. Due to the increased number of condominiums on-site, more vehicle trips per day would be generated by the additional residents living on the project site. Therefore, the long-term automobile-related noise impacts would be greater under Alternative C than under the proposed project. Overall, construction and operational noise impacts under Alternative C would be greater than under the proposed project.

Traffic/Transportation

Due to the 22 additional condominiums onsite and its associated residents, more vehicle trips per day would be generated under Alternative C. As such, traffic impacts to local roadway segments and intersections would be greater under this alternative compared to the proposed project.

Relationship to Project Objectives

Although Alternative C would not create any significant environmental impacts, all of the insignificant impacts would be greater than the proposed project. In addition, Alternative C would not satisfy the project objectives because it would not develop the site with the Tentative Tract Map (TTM) 27025, which was recorded on October 31, 1979.

Reduction of Significant Project Impacts

With implementation of the recommended mitigation measures, the proposed project would not result in any significant environmental impacts, except for short-term construction noise impacts. Similar to the

¹ *The Westwood Community Plan states that this number depicts the reasonable expected population and dwelling units for the year 2010, using the midpoint of the range for the "dwelling units per net acre" category. The midpoint represents a reasonable factor, since new development within each land use category is unlikely to occur at the extremes of the range, but more likely, throughout the entire range.*

proposed project, with implementation of the recommended mitigation measures, construction of Alternative C would also not result in any significant environmental impacts associated with its development, except for short-term construction noise impacts.

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D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

In addition to the discussion and comparison of impacts of a proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an “environmentally superior” alternative be selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the fewest adverse impacts. In this case, the No Project Alternative would result in the fewest impacts on the existing environment. However, Section 15126.6(e)(2) of the CEQA Guidelines states if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives.

Based on the alternatives analysis provided above and the Alternatives Comparison Table (see Table VI-1), the Reduced Density Alternative (Alternative B) 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 B would be 25 percent shorter than the proposed project, Alternative B would decrease the visual resources and shade/shadow impacts experienced by the surrounding communities. In addition, as Alternative B would only be comprised of 25 residential units, there would be less traffic, air, and noise 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, hydrology and water quality and land use impacts under Alternative B would also be less than the proposed project. However, as previously discussed, Alternative B would not satisfy the project objectives as fully as the proposed project.

**Table VI-1
Alternatives Comparison**

Impact Area	Proposed Project Impact with Mitigation	Alternative A: No Project Alternative	Alternative B: Reduced Density Alternative	Alternative C: Consistency Alternative
Aesthetics and Shade/Shadow	Less Than Significant	Less	Less	Less
Air Quality	Less Than Significant	Less	Less	Greater
Geology and Soils	Less Than Significant	Less	Less	Greater
Hydrology	Less Than Significant	Less	Less	Greater
Land Use	Less Than Significant	Less	Similar	Similar
Noise	Significant and unavoidable	Less	Similar	Greater
Traffic/Transportation	Less Than Significant	Less	Less	Greater
<p><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></p>				