

CHAPTER 6

Alternatives

6.1 Introduction

The identification and analysis of alternatives to a project are a fundamental aspect of the environmental review process under CEQA. Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR and states that the purpose of an EIR is to identify a project's significant environmental impacts, to identify the alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided.

The *CEQA Guidelines* provide further direction regarding the consideration and discussion of project alternatives in an EIR in Section 15126.6(a) as follows:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible.

The *CEQA Guidelines* emphasize that the selection of project alternatives must be based primarily on the ability to avoid or substantially lessen significant impacts relative to the proposed project, “even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” The *CEQA Guidelines* further direct that the range of alternatives be guided by a “rule of reason,” such that only those alternatives necessary to permit a reasoned choice are addressed. In selecting project alternatives for analysis, potential alternatives must be feasible. *CEQA Guidelines* Section 15126.6(f)(1) states that:

Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries [. . .], and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site [. . .].

Beyond these factors, *CEQA Guidelines* Section 15126.6(e) requires the analysis of a “no project” alternative and *CEQA Guidelines* Section 15126.6(f)(2) provides guidance on analyzing

alternative locations. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project Alternative, then the EIR is required to identify an environmentally superior alternative among the other alternatives.

6.2 Objectives of the Proposed Project

Chapter 2.0, *Project Description*, of this Draft EIR sets forth the following list of objectives for the proposed project:

- Develop an underutilized site with an aesthetically pleasing and well-designed mixed-use housing and retail development that is distinctive and complementary to the community's character, including the Beverly Center-Cedars Sinai Regional Commercial Center, surrounding commercial uses, and the mixed-use residential tower located at 8500 Burton Way.
- Provide a high quality, high-density, mixed-use residential project adjacent to major public transportation lines including the Metro Purple Line station at Wilshire Boulevard and La Cienega Boulevard (expected 2023) and existing Metro local bus lines, a Los Angeles Department of Transportation DASH route, and an Antelope Valley bus line.
- Include new ground level open space and water features that will enhance the visual character of the neighborhood and create a pedestrian environment.
- Encourage pedestrian activity to activate the public realm by enhancing the streetscape with walkability and safety improvements, landscaping, and high-quality architecture.
- Provide housing opportunities in an urban setting near employment, goods, and services, thereby reducing traffic and air quality impacts.
- Locate development of high-density residential and retail uses on a site near compatible uses, such as the 8500 Burton Way mixed-use residential tower to the south and the Westbury Terraces condominium tower to the west.
- Include retail that provides goods and services needed in the community and is convenient to both pedestrians and vehicles.
- Create open space and recreational opportunities for residents and their guests through the provision of plazas, fitness center, swimming pool and spa, and common rooms.
- Minimize impacts to the environment by using sustainable building practices including water conservation and energy saving design principles.

6.3 Overview of Alternatives to the Project

The purpose of the alternatives analysis is to analyze alternatives that could reduce the significant impacts of a project. Implementation of the proposed project would result in significant and unavoidable impacts on a project level with regard to noise. Specifically, the project's construction would exceed existing ambient exterior noise levels by 5 dBA or more at all of the

identified offsite sensitive receptors, with the exception of the Cedars-Sinai Medical Center. While implementation of mitigation would reduce construction noise levels and render the project's construction activities in compliance with the City's noise regulations established in Sections 41.40 and 112.05 of the LAMC because all technically feasible noise-reduction measures would be used at the site, these mitigation measures would not be able to fully attenuate the project's construction noise levels to a degree where an increase in ambient noise levels at the nearest offsite receptors by more than 5 dBA would not occur. Furthermore, based on criteria set forth in the *L.A. CEQA Thresholds Guide*, construction activities lasting more than 10 days in a three month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would normally result in a significant impact. The construction noise levels associated with the proposed project would exceed the existing ambient noise levels at all of the identified offsite sensitive locations, with the exception of Cedars-Sinai Medical Center, by more than 5 dBA and for more than 10 days. Thus, the project's construction activities would generate a substantial temporary or periodic increase in ambient noise levels in the project vicinity. Therefore, the project construction noise impacts would be significant and unavoidable.

Based on the significant environmental impacts of the proposed project, the aforementioned objectives established for the proposed project and the feasibility of the alternatives considered, the following alternatives to the proposed project are evaluated in this section:

Alternative 1: No Project Alternative

The *CEQA Guidelines* require EIRs to include a No Project Alternative for the purpose of allowing decision makers to compare the effects of approving the proposed project versus a No Project Alternative. Accordingly, Alternative 1, the No Project Alternative, would assume that the development of the 20-story mixed-use residential building on the 1.15-acre site would not occur. The No Project Alternative would not require a General Plan Amendment (GPA) to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial. Nor would the alternative require a Vesting Zoning and Height District change from C2-1VL-O to C2-2-O to change the Height District 1VL to Height District 2 to allow construction of a 240-foot building. Under this Alternative, the existing vacant ground-floor commercial space, previously occupied by the Loehmann's Department Store, would be occupied by another commercial tenant. Under the No Project Alternative, there would be no project, no amendments, and the existing project site would continue to operate consistent with prior operations.

Alternative 2: Existing Zoning Alternative

Alternative 2, the Existing Zoning Alternative, would develop the proposed project in compliance with the existing zoning and height designations. The Wilshire Community Plan designates project site as Neighborhood Office Commercial and the City's Zoning Code designates the project site as C2-1VL-O (Commercial, Height District 1VL, Oil Drilling District). Under the existing zoning, Height District 1VL is limited to a maximum building height of 45 feet, and a FAR of 1.5:1. Uses permitted in the C2 zone include, but are not limited to, offices (business or professional), retail stores or repair shops, restaurants or cafes, amusement enterprises, residential uses (that must comply with requirements of the R4 zone, Section 12.11, C.2 and 3), uses

permitted in C1.5 Limited Commercial Zones, including retail and specialty stores, hotels, and residential uses, hospitals, and medical or dental clinics and laboratories. Under this Alternative, there would be no GPA to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial. Under the Existing Zoning Alternative, there would be two development options. Option 1 would include the development of a 3-story, 45-foot tall building, with 132,000 square feet (sf) of medical office uses on all three floors. Option 2 would include the development of a 3-story, 45-foot tall building, with ground floor medical office uses and 2 stories of residential units above, totaling 40 units (20 units per floor). Under both options, there would be two levels of underground parking.

Alternative 3: Reduced Density Alternative

The Reduced Density Alternative would reduce the density of the proposed project, including a reduction in height, commercial square footage, and residential units. The height of the building would be reduced from 240 feet to 87 feet, which would reduce the structure from 20 stories to a maximum of 8 stories in height. Residential units would be reduced to 87 units and commercial square footage would be reduced to 20,000 sf. Under this Alternative, an amendment to the General Plan would still be required to change the land use designation from Neighborhood Office Commercial to Regional Commercial Center, consistent with surrounding designations. In addition, a Zoning and Height District amendment would also be required to change the designation from C2-1VL-O to C2-2VL-O, which would allow an increase in building height from 45 feet to 87 feet high. This Alternative would develop an 8-story, 87 foot tall, mixed-use residential building similar to the neighboring 8-story mixed use residential/retail building at 8500 Burton Way, with 20,000 sf of ground floor commercial-retail land uses, 87 residential units above, and two levels of underground parking and two levels of aboveground parking.

6.4 Alternatives Considered and Rejected

As set forth in the *CEQA Guidelines* Section 15126.6(c), an EIR should identify any alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the *CEQA Guidelines*, among the factors that may be used to eliminate an alternative from detailed consideration is the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility; or the alternative's inability to avoid significant environmental impacts. Alternatives to the proposed project that have been considered and rejected as infeasible include:

All Commercial Alternative: One of the alternatives initially considered included the development of an all commercial building. Under this Alternative, amendments to the General Plan would be required to change the land use designation from Neighborhood Office Commercial to Regional Commercial Center, to be consistent with surrounding Regional Commercial land uses, and an amendment to the Zoning Code would be required to change the zoning from C2-1VL-O to C2-2-O to the Height District from 1VL to 2 to allow construction of a 240-foot building. The building would contain a ground floor grocery store and commercial office above. Under this Alternative, there would be no residential uses onsite. The height of the building under this Alternative would be reduced to 11 stories. This Alternative was considered

as a means to reduce the significant and unavoidable impacts associated with construction activity noise since it would have a reduced duration of construction activities due to the lower height.

While this alternative would reduce the duration of construction activities and, therefore, shorten the duration of construction noise impacts to the surrounding sensitive receptors, there would still be a significant and unavoidable noise impact. Additionally, as an all commercial use, this alternative would conflict with the Wilshire Community Plan which identifies La Cienega Boulevard as a mixed-use corridor and which promotes the development of new mixed-use residential uses to activate a high-trafficked corridor. Furthermore, this alternative would not address the project objectives, which aim to develop a high quality mixed-use residential project adjacent to major public transportation lines that would activate the public realm. Due to the limited amount of impact reduction and failure to meet the project objectives, this alternative was rejected from further consideration.

Alternative Offsite Locations: *CEQA Guidelines* Section 15126.6 (f)(2) provides guidance regarding the consideration of one or more alternative location(s) for a proposed project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened; and if no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

Development of the proposed project at an alternate offsite location would not be consistent with the project's purpose and objectives. The proposed project's purpose and key objectives are to essentially develop an underutilized site with an aesthetically pleasing and well-designed mixed-use housing and retail development that is distinctive and complementary to the community's regional commercial character and that locates high-density residential adjacent to major transportation lines including the planned Metro Purple Line station at Wilshire Boulevard and La Cienega Boulevard, existing Metro local bus lines, Los Angeles Department of Transportation DASH route and an Antelope Valley bus line. In addition, the proposed project would be located near other high-density residential and retail uses near compatible uses, such as the 8500 Burton Way mixed-use residential tower and the Westbury Terrace condominium tower. Moreover, the mixed-use nature of the project would not complement another location that is not designated a mixed-use boulevard. As such, the proposed project is focused on the development of the particular site, which is under the ownership of the project applicant. No equivalent alternative site exists.

There are no other suitable sites that have setting characteristics that would likely result in fewer environmental impacts than the development of the project site. The proposed project's construction noise impacts are typical of impacts associated with the development of high-rise buildings on an infill site in a highly urbanized setting. Similar construction noise impacts would occur at alternative sites and many alternative sites could have site specific conditions that would result in greater impacts due to development, such as being located even closer to a residential neighborhood that would be exposed to construction activity. Given the limited amount of impact reduction and failure to meet the project objectives, this alternative was rejected from further consideration.

6.5 Analysis Format

In accordance with *CEQA Guidelines* Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the project objectives identified in Chapter 2, *Project Description*, of this Draft EIR would be mostly attained by the alternative. The project's impacts that form the basis of comparison in the alternatives analysis are those impacts which represent a conservative assessment of project impacts. The evaluation of each of the alternatives follows the process described below:

- a) The net environmental impacts of the alternative after implementation of reasonable mitigation measures and/or PDFs are determined for each environmental issue area analyzed in this EIR.
- b) Post-mitigation significant and less than significant environmental impacts of the alternative and the project are compared for each environmental issue area as follows:
 - **Less:** Where the impact of the alternative after feasible mitigation would be clearly less adverse than the impact of the project, the comparative impact is said to be "less."
 - **Greater:** Where the impact of the alternative after feasible mitigation would be clearly more adverse than the impact of the project, the comparative impact is said to be "greater."
 - **Similar:** Where the impacts of the alternative after feasible mitigation and the project would be roughly equivalent, the comparative impact is said to be "similar."
- c) The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose for the project, as well as the project's basic objectives would be substantially attained by the alternative.

As required under *CEQA Guidelines* Section 15125(d), an EIR is required to discuss inconsistencies with applicable plans. As such, this alternatives analysis includes an evaluation of consistency with the Wilshire Community Plan. The following are specific policies and objectives that apply to the proposed project and, consequently, to the alternatives:

- **Policy 1-1.4:** Provide for housing along mixed-use boulevards where appropriate.
- **Objective 1-2:** Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations, and existing bus route stops.
- **Policy 1-2.1:** Encourage higher density residential uses near major public transportation centers.

- **Policy 1-3.4:** Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.
- **Policy 1-4.3:** Encourage multiple family residential and mixed use development in commercial zones.
- **Policy 2-1.2:** Protect existing and planned commercially zoned areas especially in Regional Commercial Centers, from encroachment by standalone residential development by adhering to the community plan land use designations.
- **Objective 2-2:** Promote distinctive commercial districts and pedestrian-oriented areas.
- **Policy 2-2.1:** Encourage pedestrian-oriented design in designated areas and in new development.
- **Policy 2-2.3:** Encourage the incorporation of retail, restaurant, and other neighborhood serving uses in the first floor street frontage of structures, including mixed-use projects located in Neighborhood Districts.
- **Policy 15-1.2:** Develop off-street parking resources, including parking structures and underground parking in accordance with design standards.
- **Policy 16-1.1:** Maintain a satisfactory Level of Service (LOS) above LOS “D” for Class II Major Highways, especially those which serve Regional Commercial Centers and Community Commercial Centers; and above LOS “D” for Secondary Highways and Collector Streets.

Table 6-1, provides a summary matrix that compares impacts of the proposed project with the impacts of each of the alternatives analyzed. Please note that in Alternatives 1 through 3 in Table 6-1, the references to “less, similar, or greater,” refer to the impact of the alternative compared to the proposed project, and the impacts “no impact, less than significant, or significant and unavoidable,” in the parentheses refer to the significant impact of the specific alternative.

**TABLE 6-1
SUMMARY OF PROJECT AND ALTERNATIVES IMPACTS**

Environmental Issue	Project Impact	Alternative 1: No Project	Alternative 2: Existing Zoning Alternative		Alternative 3: Reduced Density Alternative
			Option 1	Option 2	
Aesthetics					
Light and Glare	Less than Significant	Less (No Impact)	Less (LTS)	Less (LTS)	Less (LTS)
Shade/Shadow	Less than Significant	Less (No Impact)	Less (LTS)	Less (LTS)	Less (LTS)
Land Use and Planning					
Plan Consistency	Less than Significant	Similar (LTS)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Noise					
Construction Noise in excess of standards established in the local general plan or noise ordinance.	Less than Significant	Less (No Impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Operational Noise in excess of standards established in the local general plan or noise ordinance	Less than Significant	Less (No Impact)	Similar (LTS)	Similar (LTS)	Similar (LTS)
Vibration Impacts	Less than Significant	Less (No Impact)	Less (LTS)	Less (LTS)	Less (LTS)
Ambient Construction Noise	Significant and Unavoidable	Less (No Impact)	Less (SU)	Less (SU)	Less (SU)
Transportation and Circulation					
Conflict with an applicable plan, ordinance, or policy establishing measures for effectiveness for the performance of the circulation system	Less than Significant	Less (No Impact)	Greater (SU)	Less (LTS)	Less (LTS)
Conflict with an applicable congestion management program	Less than Significant	Less (No Impact)	Less (LTS)	Less (LTS)	Less (LTS)

LTS = Less than significant impact

LTS with MM = Less than significant impact after implementation of mitigation measure(s)

SU with MM = Impacts remain significant and unavoidable, even after implementation of all feasible mitigation measure(s)

6.6 Impact Analysis

Alternative 1: No Project

Environmental Impact Analysis

Aesthetics

Under the No Project Alternative, there would be no GPA to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial. In addition, there would be no amendment to change the Zoning District from C2-1VL-O to C2-2-O or to change the Height District from 1VL to 2 to allow construction of a 240-foot building. As such, the proposed project would not be constructed and there would be no new impacts regarding light, glare, shading, and shadows on the surrounding sensitive receptors. The existing structure would remain on the project site and the project applicant would have the option of leasing the vacant space to a new commercial tenant. In the event that a new commercial tenant were to occupy the ground floor space of the existing building, no alterations would occur in terms of introducing new light, glare, shade, and shadow impacts. Therefore, impacts to aesthetic resources would be eliminated in comparison to the proposed project.

Land Use and Planning

Under this Alternative, there would be no GPA to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial. In addition, there would be no amendment to change the Zoning District from C2-1VL-O to C2-2-O or to change the Height District from 1VL to 2 to allow construction of a 240-foot building. The existing building would remain and, thus, the commercial uses at the project site would continue to be consistent with historic use of the site. However, the No Project Alternative would not be consistent with the goals set forth in the Wilshire Community Plan. The Wilshire Community Plan includes planning goals and objectives to maintain the community's distinctive character by providing a variety of housing opportunities, improving the function, design and economic vitality of commercial areas, and maximizing development opportunities around existing and future transit systems while minimizing adverse impacts. Specifically, Alternative 1 would not meet the following goals and policies of the Wilshire Community Plan: Policy 1-1.4, Policy 1-2.1, Objective 1-2, Policy 1-3.1, Objective 2-2, Policy 2-2.1, and Policy 2-2.3. Alternative 1 would maintain the existing commercial and parking garage uses onsite, which would not meet the Wilshire Community Plan's goals of providing housing opportunities along mixed use boulevards or higher density housing near existing and future transit systems, encourage multiple family residential and mixed use development in commercial zones, or contribute to the function, design, and economic vitality of the surrounding commercial areas. Although the existing commercial and parking garage uses would meet Wilshire Community Plan Policy 2-1.2, Policy 15-1.2, and Policy 16-1.1, this alternative would not satisfy as many objectives and policies of the Wilshire Community Plan as the proposed project. Nonetheless, because this alternative would be a continuation of an existing land use, it would not conflict with an existing land use plan or policy. Therefore, impacts would be less than significant under the No Project Alternative and similar to the less than significant impacts identified for the proposed project.

Noise

Under the No Project Alternative, development of a 20-story mixed-use residential building would not occur at the project site. Instead, the project site would retain the existing structure and commercial uses. Under this Alternative, there would be no construction or vibration noise generated, no additional vehicle trips would be generated, and the temporary significant and unavoidable increases in the ambient noise level as a result of project construction would be avoided. In the event the vacant ground floor is occupied by a new commercial tenant, there would be no impact with regard to noise as no construction would be required. Additionally, noise levels associated with vehicular traffic during operation of the No Project Alternative would be consistent with previous uses of the project site and, thus, would not add additional vehicle traffic that could contribute to a significant impact. Therefore, there would be no impact and the No Project Alternative would result in less noise impacts than the proposed project.

Transportation and Circulation

Under the No Project Alternative, development of a 20-story mixed-use residential building would not occur at the project site. There would be no GPA to change the land use designation from Neighborhood Office Commercial to Regional Center Commercial. In addition, there would be no amendment to change the Zoning District from C2-1VL-O to C2-2-O or to change the Height District from 1VL to 2 to allow construction of a 240-foot building. Given the absence of new development, traffic, access (including emergency access), circulation, and parking supply are expected to remain the same as current conditions. Additionally, as described in Section 4.4, *Transportation and Circulation*, the analysis for the proposed project takes trip credits for the previous tenant (Loehmann's) that occupied the project site for at least six months during the past two years. Given that the existing trips are built into the baseline studied by the proposed project, it can be assumed that any new tenant moving into the project site would not add additional vehicle trips to the project site and there would be no impact from the No Project Alternative. Thus, there would be no impact associated with this alternative and impacts on transportation and circulation would be less than the proposed project's less-than-significant impacts.

Comparison of Impacts

The No Project Alternative would avoid the proposed project's significant and unavoidable construction noise impacts. Impacts associated with the remaining environmental issues would be less than those of the proposed project.

Relationship of the Alternative to the Project Objectives

No new development would be introduced on the project site under the No Project Alternative and existing uses would continue, with the potential for a new commercial tenant occupying the project site. As a result, Alternative 1 would not meet the project objectives to develop an underutilized site with an aesthetically pleasing and well-designed mixed-use housing and retail development adjacent to major public transportation lines. Alternative 1 would also not meet the objectives to enhance the visual character of the neighborhood, encourage pedestrian activity, activate the public realm by enhancing the streetscape with walkability and safety improvements, or provide housing in an urban setting in close proximity to employment, goods, and services.

Furthermore, this alternative would not locate development of high-density residential and retail uses on a site near compatible uses, create open space and recreational opportunities for residents and their guests, or minimize impacts to the environment by using sustainable building practices including water and energy saving design principles. Overall, the No Project Alternative would not meet the project's objectives.

Alternative 2: Existing Zoning Alternative

Environmental Impact Analysis

Aesthetics

Under Alternative 2, Existing Zoning Alternative, there would be no GPA to change the land use designation Neighborhood Office Commercial to Regional Center Commercial. In addition, there would be no amendment to change the Zoning District from C2-1VL-O to C2-2-O or to change the Height District from 1VL to 2, to allow construction of a 240-foot building. As such, under both Options 1 and 2, as described above, the proposed development would remain a 3-story, 45-foot building, similar to the height of the existing building. Like the proposed project, this alternative would include construction activities that would involve the use of various lighting sources which would have the potential to spillover to offsite sensitive land uses surrounding the project site. In addition, daytime glare associated with construction activities would occur if reflective construction materials were positioned in highly visible locations where the reflection of sunlight would occur. However, like the proposed project, this alternative would implement PDF 4.1-1, which would require the shielding of construction-related light sources. Furthermore, given the diminished size of the proposed structure under this alternative, the construction schedule would be reduced, which would in turn reduce the time period in which light and glare impacts could occur during construction. With this shielding and reduced construction time, construction impacts related to light and glare would be less than significant and reduced compared to the less-than-significant impacts identified for the proposed project.

During operation of the Existing Zoning Alternative, light sources would be similar to what currently exists, given the three-story height of the proposed structure. These light sources include street lights, low level security lighting, vehicle headlights, interior lighting from the ground-floor commercial retail uses, and architectural lighting. In addition, this alternative would introduce new sources of glare, including building surfaces and project-related vehicles. Like the proposed project, this alternative would be designed in a contemporary architectural style and could feature a wide variety of surface materials, including: pre-cast concrete, terra cotta, plaster, aluminum, glass, tile, and prefinished metal. However, both light and glare impacts would be reduced in comparison to the proposed project given the reduction in height of this alternative. Furthermore, like the proposed project, this alternative would implement PDFs 4.1-2 through 4.1-4, which sets forth exterior lighting standards, would limit the type of lighting sources, including signs, and require the use of anti-reflective or treated with anti-reflective coating in order to minimize glare from reflected sunlight. Given the reduction in height and implementation of the PDFs, Alternative 2 operational impacts related to light and glare would be less than significant and reduced compared to the less-than-significant impacts identified for the proposed project.

While the Existing Zoning Alternative would introduce a new structure to the project area and, thus, potentially introduce new shading impacts, these impacts would be similar to existing conditions given the height of the proposed structure. Thus, shading impacts would be similar to existing conditions and impacts would be less than significant and reduced in comparison to the proposed project.

As described herein, Alternative 2 would have a reduced individual impact compared to the proposed project; therefore, its contributions to any cumulative impact would be reduced in comparison to the contributions of the proposed project. Given that the proposed project has less than a cumulatively considerable contribution to a significant impact with respect to light, glare, and shade and shadow, this alternative would also result in a less than cumulatively considerable light, glare, and shade and shadow impact.

Land Use and Planning

Under Alternative 2, for both Options 1 and 2, this alternative would be constructed under the existing land use designation of Neighborhood Office Commercial and existing zoning designation of C2-1VL-O. Option 1 would consist of three levels of medical office uses, which would be a new use on the project site. Medical office uses are allowed under the City's Zoning Code. Thus, Option 1 would generally be consistent with the applicable land use goals and policies in the City's General Plan Framework, the Wilshire Community Plan, and the City's Zoning Code. As described above, the Wilshire Community Plan sets forth planning objectives and policies to maintain the community's distinctive character by providing a variety of housing opportunities, improving the function, design, and economic vitality of commercial areas, and maximizing development opportunities around existing and future transit systems while minimizing adverse impacts. Similar to the proposed project, Option 1 would be consistent with the objectives and policies in the Wilshire Community Plan, including: Policy 1-3.4, Policy 2-1.2, and Policy 15-1.2. However, Option 1 would not provide residential uses, which is a key goal of the Wilshire Community Plan and, thus, would be inconsistent with Policies 1-1.4, 1-2.1, 1-3.1, and Objective 1-2. Furthermore, Alternative 2, Option 1, would not be consistent with Wilshire Community Plan Objective 2-2 and Policy 2-2.1, which promote and encourage pedestrian-oriented areas and design. Nonetheless, given Option 1's overall consistency with the applicable land use objectives and policies of the Wilshire Community Plan, this option would be less than significant, and similar to the less-than-significant impacts identified for the proposed project.

Option 2 would consist of ground-floor medical office uses and two levels of residential units above, totaling 40 residential units, which would be consistent with the applicable land use goals and policies in the City's General Plan Framework, the Wilshire Community Plan, and the City's Zoning Code. Even with less development, Alternative 2, as with the proposed project, would be consistent with the goals and policies in the local and regional land use plans related to focusing development close to transit centers, providing job opportunities, and encouraging the development of commercial and residential uses. Alternative 2, Option 2 would include some housing and commercial-retail opportunities onsite, which would be located in close proximity of existing and future transit lines, but would not contribute to the function, design, and economic vitality of the area to the extent that the proposed project would meet those goals. Nonetheless,

Option 2 would be consistent with applicable land use plans and policies and impacts would be less than significant and similar to the less-than-significant impacts identified for the proposed project.

Alternative 2 would have similar impacts to the proposed project; therefore, its contributions to any cumulative impact would be similar to the contributions of the proposed project. Given that the proposed project makes no cumulative considerable contribution to a significant cumulative impact with respect to land use, this alternative would not contribute to a significant cumulative impact.

Noise

Violate Noise Standards Established by the LAMC

Construction

Under the Existing Zoning Alternative, development would consist of a 3-story, 45-foot tall building, with two development options. Option 1 would consist of medical office uses on all three floors. Option 2 would consist of ground-floor medical office uses and two levels of residential units above, totaling 40 residential units. Like the proposed project, construction activities associated with the development of the Existing Zoning Alternative have the potential to generate noise and vibration impacts through the use of construction equipment as well as from construction traffic. Development of the two options identified under Alternative 2 would require the same stages of construction as the proposed project, including demolition and excavation, which would increase exterior noise levels by 5 dBA or more at all of the identified offsite sensitive receptors, with the exception of the Cedars-Sinai Medical Center. According to the *L.A. CEQA Thresholds Guide*, construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would normally result in a significant impact. Thus similar to the proposed project, Alternative 2 has the potential to result in significant impacts. To reduce such impacts Alternative 2, similar to the proposed project, would be required to implement Mitigation Measures 4.3-1 through 4.3-7, which would require the implementation of noise reduction devices and techniques during construction. With implementation of these measures, the construction activities associated with Alternative 2, Options 1 and 2, would comply with the LAMC noise regulations and, therefore, noise impacts during project construction would be reduced to a less-than-significant level, similar to the proposed project.

Operation

Under Alternative 2, operational noise levels generated at the project site would mainly occur from new mechanical equipment, the loading dock serving the new commercial uses, parking facilities, activity at outdoor gathering areas, and from offsite mobile noise sources from increased traffic. Like the proposed project, these noise sources have the potential to generate noise exceeding ambient noise levels. However, similar to the proposed project, Alternative 2, Options 1 and 2, would be required to comply with the City's Building Code and, as such, noise impacts associated would be less than significant and similar to those of the proposed project.

Vibration Impacts

In addition, similar to the proposed project, construction activities under the Existing Zoning Alternative would generate ground vibration during site demolition and excavation/grading activities. The estimated vibration velocity levels of the proposed project would be below the significance thresholds for potential building damage and human annoyance after incorporation of Mitigation Measure 4.3-1. Given the reduced development levels that would occur under Alternative 2, impacts would be similar during peak construction periods, but would be reduced overall compared to those of the proposed project. Furthermore, like the proposed project, Alternative 2 would be required to implement Mitigation Measure 4.3-1 to reduce vibration impacts. Thus, impacts under Alternative 2 would be less than the less-than-significant impacts identified for the proposed project.

Increase in Ambient Noise Levels

As described above, while construction activities would be reduced in duration in comparison to the proposed project, peak-day demolition and excavation activities would be comparable to those of the proposed project. Thus, this alternative would result in impacts that would be similar on a peak day, but less than those of the proposed project due to the considerable decrease in size, mass, and scale of the alternative. However, this reduction would not be enough to reduce the significant and unavoidable construction noise impact that was identified for the proposed project.

The proposed project's cumulatively considerable impact is considered less-than-significant as the nearest related project would be located approximately 1,265 feet from the project site. Due to the distance of the related project from the project site, the numerous intervening structures located between the project site and the related project site would serve to reduce construction-related noise levels should construction occur at the same time. Given that the proposed project makes no cumulatively considerable contribution to a significant cumulative impact with respect to land use, this alternative would not contribute to a significant cumulative impact.

Transportation and Circulation

Under the Existing Zoning Alternative, development would consist of a 3-story, 45-foot tall building, with two development options. Option 1 would consist of three levels of medical office uses. Option 2 would consist of ground-floor medical office uses and two levels of residential units above, totaling 40 residential units. Due to the reduction in mass and scale of the building under both Options 1 and 2, Alternative 2 would result in a reduced duration of construction activities, which would decrease the number of vehicle trips generated by the proposed project during construction. Nonetheless, like the proposed project, the alternative would increase truck traffic associated with the import/export of fill materials and delivery of construction materials; would increase automobile traffic associated with construction workers traveling to and from the project site; would result in lane and sidewalk closures on La Cienega Boulevard and San Vicente Boulevard at times for construction staging, utility relocations/hook ups, delivery of materials, and other construction activities; and, given the temporary street closures, would reduce access to

emergency services located nearby that regularly use the affected streets. However, given the reduced construction schedule, traffic impacts and temporary street closures would be reduced in length compared to the proposed project. In addition, like the proposed project, Alternative 2 would implement PDF 4.4-1, CTMP, which would formalize how construction would be carried out and identify actions that would be required to reduce effects on the surrounding community. The CTMP would be reviewed and approved by LADOT prior to commencement of project construction. Thus, adherence to the measures set forth in the CTMP would ensure that Alternative 2's construction impacts are less than significant and less than those identified for the proposed project.

Similar to the proposed project, operation of the Existing Zoning Alternative, Option 1 would result in an increase in vehicle traffic in the project area. However, it would result in increased trips due to the volume of medical office visits. Development of Option 1 would generate a total of 3,002 daily vehicle trips to the project site, with 217 AM peak hour vehicle trips and 304 PM peak hour vehicle trips. This would be an increase over the proposed project's estimated 1,947 daily vehicle trips, with 101 AM peak hour vehicle trips and 183 PM peak hour vehicle trips. An incremental increase of this amount in the volume-to-capacity ratio (V/C) has the potential to exceed the significance thresholds set forth by LADOT and the City of Beverly Hills at several intersections, including: No. 3, Doheny Drive and Burton Way (City of Los Angeles) in the AM peak hour; No. 6, La Cienega Boulevard and Beverly Boulevard (City of Los Angeles) in the PM peak hour; No. 20, La Cienega Boulevard and Wilshire Boulevard (City of Beverly Hills) in the AM and PM peak hours; and No. 21, La Cienega Boulevard and Olympic Boulevard (City of Los Angeles) in the AM and PM peak hours. Given this increase in volume-to-capacity ratio at these intersections and the potential exceedance of significance thresholds set forth by LADOT and City of Beverly Hills, it is likely that Alternative 2, Option 1 would result in a significant impact. Therefore, the addition of traffic under Option 1 would be considered significant and greater than those identified for the proposed project. In addition to an increase in vehicle traffic, there would be a slight increase in public transit use.

Option 2 would also generate vehicle traffic in the project area; however, this increase would be less than what was identified for the proposed project, given the reduction in residential units on the project site. Development of Option 2 would generate a total of 917 daily vehicle trips to the project site, with 82 AM peak hour vehicle trips and 97 PM peak hour vehicle trips. This would be a reduction compared to the proposed project's estimated 1,947 daily vehicle trips, with 101 AM peak hour vehicle trips and 183 PM peak hour vehicle trips. Thus, similar to the proposed project, this option would result in less-than-significant impacts and reduced in comparison to the proposed project.

Alternative 2 would have greater (Option 1) and reduced (Option 2) individual impacts in comparison to the proposed project. Given the increase in traffic that would occur under Alternative 2, Option 1, this option would result in a cumulatively considerable impact with respect to traffic and circulation and, thus, would contribute to a significant cumulative impact. Alternatively, given its decrease in traffic, Alternative 2, Option 2 would not make a cumulatively

considerable impact with respect to traffic and circulation and, thus, this option would not contribute to a significant cumulative impact.

Comparison of Impacts

The Existing Zoning Alternative, Option 1 would not avoid the proposed project's significant and unavoidable construction noise impact. In addition, this option would increase the daily vehicle trips to the project site compared to the proposed project. Given this increase, the volume-to-capacity ratio at these intersections would increase and potentially exceed the significance thresholds set forth by LADOT and City of Beverly Hills. Thus, it is likely that Alternative 2, Option 1 would result in a greater transportation impact than the proposed project. Impacts associated with the remaining environmental issues would be similar or less than those of the proposed project.

Similar to the proposed project, the Existing Zoning Alternative, Option 2 would not avoid the significant and unavoidable impact for construction noise. Impacts associated with the remaining environmental issues would be similar or less than those of the proposed project.

Relationship of the Alternative to the Project Objectives

Under Alternative 2, Existing Zoning Alternative, there would be no GPA to change the land use designation Neighborhood Office Commercial to Regional Center Commercial. In addition, there would be no amendment to change the Zoning District from C2-1VL-O to C2-2-O or to change the Height District from 1VL to 2, to allow construction of a 240-foot building. As such, under both Options 1 and 2, as described above, the proposed development would remain a 3-story, 45-foot building, similar to the height of the existing building. Option 1 would include three levels of medical office uses. Option 2 would include the development of ground floor medical office uses and two stories of residential units above, totaling 40 units (20 units per floor).

Option 1 would meet the objectives to provide services needed in the community and to minimize impacts to the environmental by using sustainable building practices including water and energy saving design principles. Given that Alternative 2, Option 1 would develop the site with medical office uses only, though, it would not meet the project objective to develop the project site with an aesthetically pleasing and well-designed mixed-use housing and retail development. While this option would develop a new use on the project site, the aesthetic character and use of the site would be similar to what currently exists and, thus, the site under this option would continue to be underutilized. In addition, Option 1 would not fully meet the project objectives that promote the development of high quality, high-density mixed-use residential and retail uses adjacent to major public transportation lines, in close proximity to employment, goods, and services, and near compatible uses. It would also not meet the project objective to create open space and recreational opportunities for residents, nor would it provide new ground level open space and water features that would enhance the visual character of the neighborhood. Furthermore, this alternative would not encourage pedestrian activity with walkability and safety improvements, landscaping, and high quality architecture.

Option 2 would include the development of both medical office and residential uses. Similar to Option 1 and the proposed project, Option 2 would meet the objectives to provide goods and services needed in the community and to minimize impacts to the environment by using sustainable building practices including water and energy saving design principles. However, while this alternative would provide mixed-use housing that is complementary to the community's character, adjacent to major public transportation lines, to employment, goods, and services, and near compatible uses, it would not provide high-density housing which is one of the key components of the project objectives. Thus, Option 2 would not meet these objectives. In addition, Option 2 would not create open space and recreational opportunities for residents, nor would it provide new ground level open space and water features that would enhance the aesthetic of the neighborhood. Furthermore, this alternative would not encourage pedestrian activity with walkability and safety improvements, landscaping, and visually stimulating architecture.

Alternative 3: Reduced Density Alternative

Environmental Impact Analysis

Aesthetics

Under Alternative 3, the overall mass and scale of the proposed structure would be reduced compared to the proposed project. However, similar to the proposed project, this alternative would require a GPA to change the land use designation of Neighborhood Office Commercial to Regional Center Commercial, a change in the Zoning from C2-1VL-O to C2-2-O, and an amendment to change the Height District from 1VL to 2, to allow construction of an 8-story mixed-use residential building. Like the proposed project, this alternative would include construction activities that would involve the use of various lighting sources with potential spillover onto offsite sensitive land uses surrounding the project site. In addition, daytime glare associated with construction activities would occur if reflective construction materials were positioned in highly visible locations where the reflection of sunlight would occur. However, like the proposed project, this alternative would implement PDF 4.1-1, which would require the shielding of construction-related light sources. Furthermore, given the diminished size of the proposed structure under this alternative, the construction schedule would be reduced, which would in turn reduce the time period in which light and glare impacts could occur during construction. With this shielding and reduced construction time, construction impacts related to light and glare would be less than significant and reduced in comparison to the proposed project.

During operation of the Reduced Density Alternative, light sources would be similar to those identified for the proposed project. These light sources include street lights, low level security lighting, vehicle headlights, interior lighting from the ground-floor commercial retail uses, and architectural lighting. In addition, this alternative would introduce new sources of glare, including building surfaces and project-related vehicles. Like the proposed project, this alternative would be designed in a contemporary architectural style and could feature a wide variety of surface materials, including pre-cast concrete, terra cotta, plaster, aluminum, glass, tile, and prefinished metal. However, both light and glare impacts would be reduced in comparison to the proposed project given the reduction in height of this alternative. Furthermore, like the proposed project,

this alternative would implement PDFs 4.1-2 through 4.1-4, which set forth exterior lighting standards to limit the type of lighting sources and require the use of anti-reflective coating to minimize glare. Given the reduction in height and implementation of the PDFs, Alternative 3 operational impacts related to light and glare would be less than significant and reduced in comparison to the proposed project.

While the Reduced Density Alternative would introduce a new structure to the project area and, thus, could potentially introduce new shading impacts. Impacts from the Reduced Density Alternative would be greater than existing conditions given the height of the proposed structure. However, impacts would be less than significant overall and reduced in comparison to the proposed project.

Alternative 3 would have reduced individual impacts compared to the proposed project. Therefore, this alternative would result in a less than cumulatively considerable impact related to aesthetics.

Land Use and Planning

Under Alternative 3, similar amendments to the Zoning and Height District designations would be required to change the allowable building height. Additionally, a GPA would be required to change the land use designation from Neighborhood Office Commercial to Regional Commercial Center. The Reduced Density Alternative would include the construction of an 8-story structure, with 20,000 sf of ground-floor commercial uses and 87 residential units, which would be consistent with the land use goals and policies in the City's General Plan Framework, the Wilshire Community Plan, and the City's Zoning Code related to focusing development close to transit centers, providing job opportunities, and encouraging the development of commercial and residential uses. As described above, the Wilshire Community Plan sets forth planning objectives and policies to which apply to Alternative 3. Similar to the proposed project, Alternative 3 would be consistent with the objectives and policies in the Wilshire Community Plan related to focusing development close to transit centers, providing job opportunities, and encouraging the development of commercial uses. These objectives and policies include: Policies 1-1.4, 1-2.1, 1-3.1, 1-3.4, 2-1.2, 15-1.2, 16-1.1 and Objectives 1-2, although Alternative 3 would not fulfill these policies and objectives to the same degree as the proposed project. These policies encourage providing more housing along mixed-use corridors and providing higher-density housing near public transit in order to reduce vehicle trips. Alternative 3 would have a lower density of housing and, thus, would not fulfill these policies and objectives to the same degree as the proposed project. However, Alternative 3 would not be consistent with Wilshire Community Plan Objective 2-2 and Policy 2-2.1, which promote and encourage pedestrian-oriented areas and design. Nonetheless, given Alternative 3's overall consistency with the applicable land use objectives and policies of the Wilshire Community Plan, this option would be less than significant, and similar to the less-than-significant impacts identified for the proposed project

Alternative 3 would have similar individual impacts to the proposed project; therefore, its contributions to any cumulative impact would be less-than-significant.

Noise

Violate Noise Standards Established by the LAMC

Construction

Under the Reduced Density Alternative, development would consist of an 8-story structure, 20,000 sf of ground-floor commercial uses, and 87 residential units. Like the proposed project, construction activities associated with the development of the Reduced Density Alternative have the potential to generate noise and vibration impacts through the use of construction equipment as well as from construction traffic. Development of Alternative 3 would require the same stages of construction as the proposed project, including demolition and excavation, which would increase exterior noise levels by 5 dBA or more at the identified offsite sensitive receptors except the Cedars-Sinai Medical Center. According to the *L.A. CEQA Thresholds Guide*, construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise sensitive use, would normally result in a significant impact. Thus, similar to the proposed project, Alternative 3 has the potential to result in significant impacts. To reduce such impacts, Alternative 3, like the proposed project, would be required to implement Mitigation Measures 4.3-1 through 4.3-7, which require the implementation of noise reduction devices and techniques during construction. With implementation of these measures, the construction activities associated with Alternative 3 would comply with the LAMC noise regulations and, therefore, noise impacts during project construction would be reduced to a less-than-significant level, similar to the proposed project.

Operation

Under Alternative 3, operational noise levels generated at the project site would mainly occur from new mechanical equipment, the loading dock serving the new commercial uses, parking facilities, activity at outdoor gathering areas, and from offsite mobile noise sources from increased traffic. Like the proposed project, these noise sources have the potential to generate noise exceeding ambient noise levels. However, similar to the proposed project, Alternative 3 would be required to comply with the City's Building Code requirements and, as such, noise impacts associated with land use compatibility would be less than significant, similar to those of the proposed project.

Vibration Impacts

Similar to the proposed project, construction activities under the Reduced Density Alternative would generate ground vibration during site demolition and excavation/grading activities. The estimated vibration velocity levels of the proposed project would be below the significance thresholds for potential building damage and human annoyance after incorporation of Mitigation Measure 4.3-1. Given the reduced development levels that would occur under Alternative 3, impacts would be similar during peak construction periods, but would be reduced overall compared to those of the proposed project. Thus, impacts under Alternative 3 would be less-than-significant, and reduced in comparison to the proposed project.

Increase in Ambient Noise Levels

As described above, while construction activities would be reduced in duration in comparison to the proposed project, peak-day demolition and excavation activities, including construction

equipment use, would be comparable to those of the proposed project. Thus, similar to the proposed project, the Reduced Density Alternative would exceed the 5 dBA threshold at the offsite sensitive receptors during construction activities. While the Reduced Density Alternative would reduce the overall construction schedule as compared to the proposed project, this reduction would only slightly reduce construction work days and would not contribute to an overall reduction in noise levels during construction since similar construction equipment would be used for both projects. Thus, Alternative 3 would result in impacts that would be similar on a peak day, but less overall than those of the proposed project due to the decrease in size, mass, and scale of the alternative. However, this reduction would not be enough to reduce the significant and unavoidable impact that was identified for the proposed project. Therefore, construction noise impacts would be significant and unavoidable for the Reduced Density Alternative.

This Alternative would have a significant and unavoidable noise impact. However, the nearest related project would be located approximately 1,265 feet from the project site, reducing the project's potential contribution to a significant cumulative impact. Due to the distance of the related project from the project site, the numerous intervening structures would serve to reduce construction-related noise levels should construction occur at the same time. Therefore, Alternative 3 would result in a less-than-significant cumulative noise impact.

Transportation and Circulation

Under the Reduced Density Alternative, the duration of construction activities would be slightly reduced when compared to the proposed project due to the reduced density of the building. However, like the proposed project, the Alternative would increase truck traffic associated with the import/export of fill materials and delivery of construction materials; would increase automobile traffic associated with construction workers traveling to and from the project site; would result in lane and sidewalk closures on La Cienega Boulevard and San Vicente Boulevard at times for construction staging, utility relocations/hook ups, delivery of materials, and other construction activities. In addition, given the temporary street closures, this Alternative would reduce access to emergency services. However, given the reduced construction schedule, traffic impacts and temporary street closures would be reduced in duration compared to the proposed project. In addition, like the proposed project, Alternative 3 would implement PDF 4.4-1, CTMP, which would formalize how construction would be carried out and identify actions that would be required to reduce effects on the surrounding community. The CTMP would be reviewed and approved by LADOT prior to commencement of project construction. Thus, adherence to the measures set forth in the CTMP would ensure that Alternative 3's construction impacts are less than significant. In addition, impacts would be reduced in comparison to the proposed project.

Operation of the Reduced Density Alternative would result in an increase in vehicle traffic in the project area; however, this increase would be less than what was identified for the proposed project given the reduction in residential units on the project site. Thus, like the proposed project, the addition of traffic to existing conditions would increase the V/C delay by less than 0.005 and, therefore, would not result in a substantial change to the volume-to-capacity ratio and would not exceed the significance thresholds set forth by LADOT. Therefore, the addition of traffic under

Alternative 3 would be considered less than significant, but reduced in comparison to the proposed project.

Comparison of Impacts

The Reduced Density Alternative would not avoid the proposed project's significant and unavoidable construction noise impacts. Impacts associated with the remaining environmental issues would be similar or less than those of the proposed project.

Relationship of the Alternative to the Project Objectives

The Reduced Density Alternative would include the construction of an 8-story structure, with 20,000 sf of ground-floor commercial uses and 87 residential units. Similar to the proposed project, this alternative would require amendments to the Zoning and Height District designations to change the allowable building height. Additionally, a GPA would be required to change the land use designation from Neighborhood Office Commercial to Regional Commercial Center. Similar to the proposed project, the Reduced Density Alternative would include both commercial-retail and residential uses. The Reduced Density Alternative would meet the project objectives to include retail that provides goods and services needed in the community and to minimize impacts to the environment by using sustainable building practices including water and energy saving design principles. However, while this alternative would provide mixed-use housing that is complementary to the community's character and uses, adjacent to major public transportation lines, and close to employment, goods and services, it would not provide high-density housing, one of the key components of the project objectives. While this alternative would provide an amenity level, similar to the proposed project, it would not provide new ground level open space and water features that would enhance the neighborhood. Thus, this alternative would not meet the project objectives to provide open space and amenities for pedestrians and residents. Furthermore, this alternative would not encourage pedestrian activity with walkability and safety improvements, landscaping, and high quality architecture.

6.7 Environmentally Superior Alternative

Section 15126.6(e)(2) of the *CEQA Guidelines* indicates that an analysis of alternatives to a project shall identify an Environmentally Superior Alternative among the alternatives evaluated in the EIR. The *CEQA Guidelines* also state that should it be determined that the No Project Alternative is the Environmentally Superior Alternative, then the EIR shall identify another Environmentally Superior Alternative among the remaining alternatives.

A comparative summary of the environmental impacts anticipated under each alternative with the environmental impacts associated with the project is provided in Table 6-1, Summary of Project and Alternative Impacts. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the *CEQA Guidelines*, the analysis presented above addresses the ability of the alternatives to "avoid or substantially lessen one or more of the significant effects" of the project.

As previously stated, the intent of the alternatives analysis is to reduce the significant impacts of a project. Implementation of the proposed project would result in significant and unavoidable impacts on a project level with regard to construction noise.

Alternative 1, the No Project Alternative, would eliminate all of the significant impacts of the proposed project, including construction noise, as there would be no change to the existing site conditions. As Alternative 1 eliminates all of the proposed project's significant impacts, it is determined to be the Environmentally Superior Alternative. In accordance with the *CEQA Guidelines* requirement to identify an Environmentally Superior Alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives was conducted and indicates that Alternative 2, the Existing Zoning Alternative, Option 2 would reduce project impacts to a greater degree than Alternative 3; however, the significant and unavoidable impact to construction noise would remain under both Alternatives 2 and 3. Nonetheless, because Alternative 2, Option 2 reduces impacts to a greater degree than Alternative 3, the Existing Zoning Alternative, Option 2 is selected as the Environmentally Superior Alternative.