

5.0 ALTERNATIVE VARIATIONS

5.1 INTRODUCTION

The Draft EIR for the Beverly Hilton Revitalization Plan evaluated five alternatives to the project, pursuant to Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines. As stated in the Draft EIR, the purpose of the alternatives analysis is to explain potentially feasible ways to avoid or minimize significant effects of the project. According to the CEQA Guidelines, an EIR need only examine in detail those alternatives that could feasibly meet most of the basic objectives of the project. The CEQA Guidelines also specify that the alternatives discussion should not be remote or speculative, and need not be presented in the same level of detail as the assessment of the proposed project.

This section defines and evaluates a variation on an alternative already evaluated in the Draft EIR and a variation on the proposed Beverly Hilton Revitalization Plan, which was circulated for public comment between August 7, 2007, and September 28, 2007, with additional public comment on the project and Draft EIR accepted through January 10, 2008. The Draft EIR evaluated a sufficient range of alternatives for purposes of CEQA compliance. These alternative variations (referred to as "Alternative 6" and "Alternative 7" for convenience) were developed in response to subsequent public comments and Planning Commission requests, with the aim of minimizing environmental impacts, and in the case of Alternative 7, providing additional community benefits (public parking), while still meeting the basic objectives of the project as set forth in Section 3.0, Project Description, of the Draft EIR. Alternative 6 and Alternative 7 were first evaluated in a report provided to the Planning Commission for review at the November 1, 2007, hearing for the proposed project.

Pursuant to the CEQA Guidelines, several factors need to be considered in determining the range of alternatives to be analyzed in an EIR and the level of analytical detail that should be provided for each alternative. These factors include (1) the nature of the significant impacts of the proposed project, (2) the ability of alternatives to avoid or substantially lessen one or more of the significant impacts, (3) the ability of the alternatives to meet the objectives of the project, and (4) the feasibility of the alternatives.

The level of analytical detail provided for the two alternative variations evaluated in this section is consistent with that provided in Section 8.0, Project Alternatives, of the Draft EIR. However, because these variations are not considerably different from the alternatives analyzed in the Draft, recirculation of these variations is not required.

5.2 RANGE OF ALTERNATIVES

The two alternative variations are as follows:

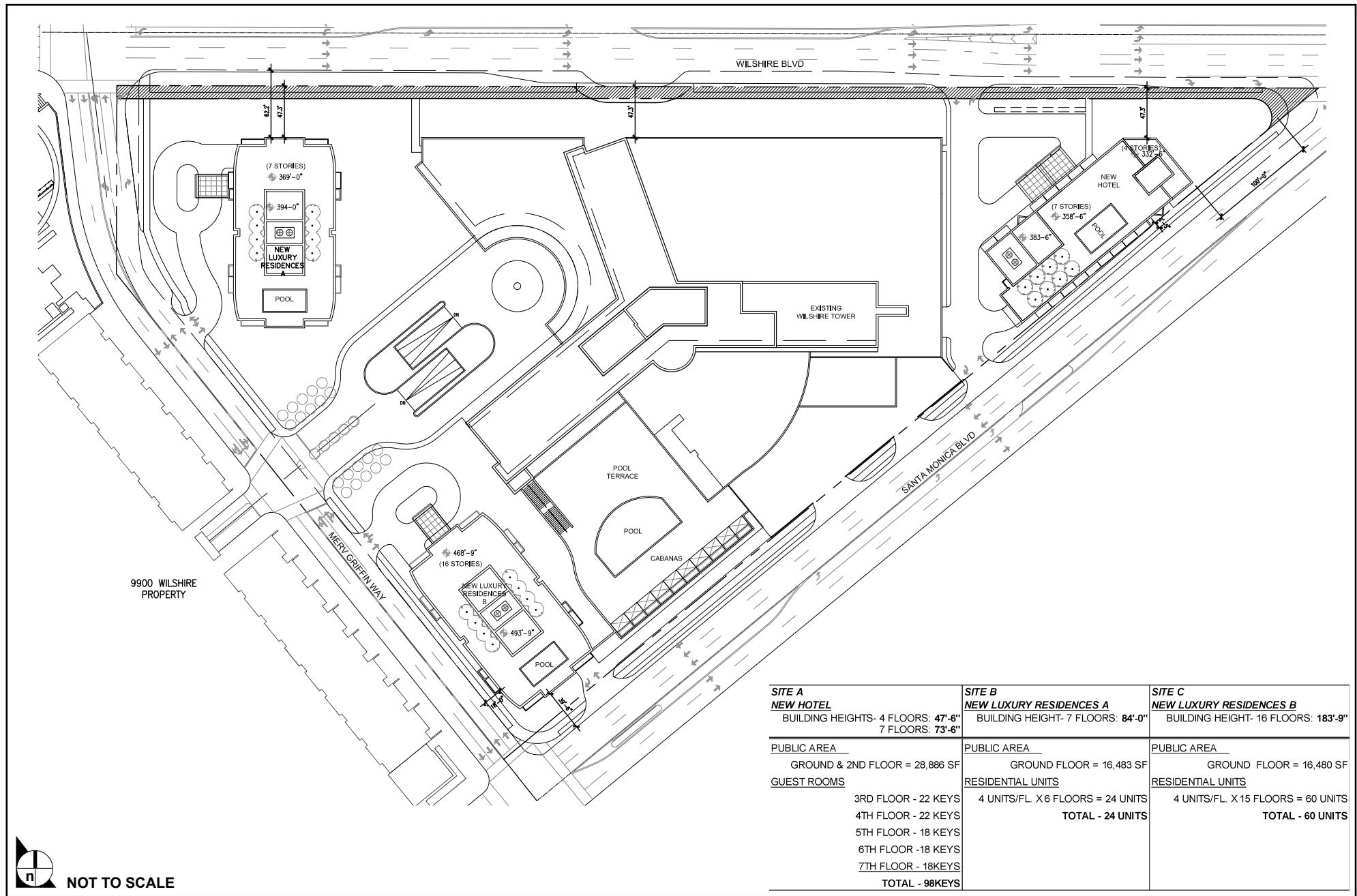
- **Alternative 6** – Reduced Building Heights and Elimination of Condos at the Waldorf (Variation on Alternative 4 – Modified Building Height Alternative – Residences A and B)
- **Alternative 7** – Additional Parking Level (Variation on the Proposed Project)

Alternative 6 – Reduced Building Heights and Elimination of Condos at the Waldorf (Variation on Alternative 4 – Modified Building Height Alternative – Residences A and B)

Alternative 6 is a variation on Alternative 4, Modified Building Height Alternative – Residences A and B (already evaluated in the Draft EIR). Alternative 6 eliminates both the proposed New Beverly Hilton Hotel Rooms wing along Wilshire Boulevard and the two-floor restaurant portion of the Waldorf=Astoria at the intersection of Wilshire and Santa Monica Boulevards. The total number of hotel rooms would be reduced to 450 rooms. Additionally, Alternative 6 eliminates the condominium units from the Waldorf=Astoria building; the total number of condominium units would be reduced to 84 units. Under Alternative 6, the height of the Residence B building would be increased to 16 floors/183 feet, the height of the Residence A building would be decreased to 7 floors/84 feet, and the step-down heights of the Waldorf=Astoria building would be decreased to 7 floor/73 feet and 4 floors/47 feet.

Further changes include moving the driveway of Residence A to the north side of the building, locating the Waldorf=Astoria building a minimum of 100 feet west of a new sidewalk at Santa Monica and Wilshire Boulevards, and having all buildings set back a minimum of 50 feet from a proposed sidewalk on Wilshire Boulevard. A site plan for Alternative 6 is shown in **Figure 5.0-1**.

The Floor Area Ratio (FAR) for this alternative is approximately 2.4:1, the same FAR as the proposed project, but greater than the maximum FAR of 2:1 currently permitted on the project site. In addition, like the proposed project, the proposed Residence A and B buildings, as well as the Waldorf=Astoria building, would exceed 45 feet in height and have more than three stories. Therefore, this alternative would still require the approval of the proposed General Plan Amendment and Specific Plan needed for the proposed project, with modifications reflecting the fact that the maximum height and number of stories for the Residence A Building under this alternative would be reduced and the height and number of stories for the Residence B Building would be increased.



SOURCE: The Beverly Hills Revitalization Plan, Gensler - October 2007

FIGURE 5.0-1

Alternative 6, Reduced Building Heights and Elimination of Condos at the Waldorf
(Variation on Alternative 4 - Modified Building Height Alternative – Residences A and B) – Site Plan

Table 5.0-1
Alternative 6 – Reduced Building Heights and Elimination of Condos at the Waldorf
(Variation on Alternative 4 – Modified Building Height Alternative – Residences A and B)

	Beverly Hilton Hotel	Waldorf=Astoria	Residence A	Residence B	Total
Hotel (rooms)	352	98	–	–	450
Condominiums (units)			24	60	84
Height (feet)	95	47 to 73	84	183	
Number of Stories	8	4 to 7	7	16	
FAR					2.4:1

¹ Beverly Hills Municipal Code Section 10-3-2730

Aesthetics

Aesthetic Character and Views

Alternative 6 would modify the Waldorf=Astoria building height and configuration in several ways. Residence B would increase from 13 floors (150 feet) to 16 floors (183 feet, 9 inches), putting the tallest building on the project site at the southwest corner of the property closest to Santa Monica Boulevard. Closer to Wilshire Boulevard, the height of Residence A would decrease from 10 floors (112 feet) to 7 floors (84 feet).

The step-down heights of the Waldorf=Astoria buildings would decrease from 14 (150 feet) and 11 floors (120 feet) to 7 floors (73 feet, 6 inches) and 4 floors (47 feet, 6 inches). Alternative 6 would eliminate both the proposed Beverly

Hilton Hotel Rooms wing along Wilshire Boulevard and the two-floor restaurant portion of the Waldorf=Astoria at the intersection of Wilshire and Santa Monica Boulevards. In Alternative 6, the FAR is decreased from 2.4:1 to 2.13:1.

As with the proposed project, this alternative still proposes increased intensity of uses on-site, introduces residential uses, and proposes building heights in excess of those in the project area, which comparable to the proposed project. Although Residence A along Wilshire would be considerably reduced in height, which would somewhat increase physical compatibility with El Rodeo School and other land uses to the north, the seven-story height would still block most westward views from the eight-story Wilshire Tower (the applicant states that approximately 114 guestrooms have west-facing views, or approximately a third of the rooms in the tower).

The accompanying height increase of Residence B on Santa Monica Boulevard, a less visually sensitive part of the project site, would not adversely affect views from El Rodeo School or the residential neighborhood north of Wilshire.

The substantial building height reductions proposed for the Waldorf=Astoria would also increase physical compatibility with off-site uses to the north by widening view corridors associated with these roadways and providing more building articulation from roadway vantages. However, the Waldorf=Astoria would still largely block views from the east of the hotel's Wilshire Tower.

Alternative 6 would somewhat reduce the significant view impacts associated with the proposed project (views of the site from the Wilshire/Santa Monica intersection, and views west from west-facing guestrooms in the hotel's Wilshire Tower). However, this alternative would not entirely avoid these view impacts, and would still conflict with General Plan Land Use objectives related to Areas of Transitional Conflict and Scale of the City. Therefore, this alternative is not considered environmentally superior to the proposed project relative to Aesthetic Character and Views.

Light and Glare

Under Alternative 6, nighttime lighting needs and impacts during construction would not vary markedly from those associated with the proposed project. Additionally, construction activities would not create sources of glare since construction is not expected to involve bright light sources that would be visible from off site.

As discussed in Section 4.1.2, Light and Glare, of the Draft EIR, project implementation would introduce new land uses, substantially increase development density, and substantially increase building heights on the project site. Accordingly, project implementation would increase ambient nighttime light levels on the project site and in the project vicinity, but impacts would be reduced to less than significant levels with mitigation.

The Residence A and B buildings would be lighted at night in a manner similar to that proposed by the project, with interior and exterior building illumination visible from off site. Project implementation would increase light levels on the project site over existing conditions and would contribute to higher ambient nighttime light levels in the project vicinity. The reduced height of Building A would slightly decrease its visibility from off-site vantages, especially the residential neighborhood to the north, and could reduce its impacts on ambient nighttime light levels in the project area. However, the reduction in the visibility of the Residence A building's nighttime illumination is likely to be offset by the increase in height, and therefore visible nighttime illumination associated with, the Residence B building. Nighttime

lighting impacts associated with Alternative 6 would therefore be comparable to those associated with the proposed project.

Similar to the proposed project, the building materials proposed for this alternative would be low-reflectivity and would be designed to minimize glare. Building heights under this alternative and setbacks from surrounding roadways would result in roughly comparable potential for glare affecting off-site land uses or activities. As such, glare impacts under Alternative 6 would be comparable to those associated with the proposed project.

The Modified Building Height Alternative would not be considered environmentally superior to the proposed project with respect to light and glare.

Shade and Shadow

Under Alternative 6, building footprints would be similar to those in the proposed project. However, Alternative 6 would modify the building height and configuration in several ways. First, the height of the height of Residence B would be increased to 16 floors/183 feet from 13 floors/150 feet. Second, the height of Residence A would be decreased from 10 floors/112 feet to 7 floors/84 feet). Third, the step-down heights of the Waldorf=Astoria would be decreased from 14/150 feet and 11 floors/120 feet to 7 floors/73 feet and 4 floors/47 feet. Finally, Alternative 6 eliminates both the proposed Beverly Hilton Hotel Rooms wing along Wilshire Boulevard and the 2 floor restaurant portion of the Waldorf=Astoria.

The shadows cast by Residence A and the Waldorf=Astoria would result in fewer shading and shadow impacts on site and to the site vicinity. The shadows cast by the 184-foot-tall Residence B would increase from those cast by the 150-foot-tall building, as discussed in 4.1.3, Shade and Shadow of the Draft EIR. The increase in shadows cast by the 184-foot-tall Residence B would result in marginally greater shading and shadow impacts to the low density retail uses south of the project site during the Summer Solstice and to the 9900 Wilshire property and the linear park along Wilshire Boulevard during the Winter Solstice, resulting in comparable impacts to the proposed project. On-site shade impacts would experience similar marginal increases at some locations, and fewer impacts at other locations of the project site. Since Residence A and the Waldorf=Astoria would result in fewer shade and shadow impacts, and Residence B would result in comparable shade and shadow impacts, Alternative 6 is considered environmentally superior to the proposed project relative to shade and shadow impacts.

Appendix A, Supplemental Shade and Shadow Diagrams for the Beverly Hilton Revitalization Plan Project, of the Final EIR provides shade simulations of this alternative variation.

Air Quality

Air quality impacts are evaluated in two categories: construction emissions and operational emissions. Construction-related emissions are associated with construction activities such as demolition, earthmoving, use of construction equipment, and application of coatings to surfaces. Operational emissions are primarily associated with mobile source emissions based on vehicle trips generated by the project.

Construction

Alternative 6 would involve demolition of the same existing buildings and structures on the site and the excavation and construction of a new subterranean parking structure as the proposed project. However, because the number of new condominium units and hotel rooms are less than the proposed project, impacts during the building construction phases would potentially be less relative to the proposed project. Consequently, construction-related emissions associated with Alternative 6 would potentially be less than those of the proposed project. Therefore, Alternative 6 would result in reduced construction-related air quality impacts relative to the proposed project and is considered environmentally superior with respect to construction emissions. Although air quality impacts would be reduced relative to the proposed project, during project construction, oxides of nitrogen (NO_x), particulate matter less than 10 microns in diameter (PM_{10}), and particulate matter less than 2.5 microns in diameter ($\text{PM}_{2.5}$) emissions would still exceed South Coast Air Quality Monitoring District (SCAQMD) established significance thresholds, and significant unavoidable impacts would still result.

Operation

Alternative 6 would result in reduced trip generation relative to the proposed project during operation. Since the number of trips associated with this project alternative would be less than that of the proposed project due to the reduced number of condominium units and hotel rooms, the alternative would result in reduced operational impacts on air quality relative to the proposed project. Therefore, Alternative 6 is considered environmentally superior with respect to operational emissions when compared to the proposed project.

Cultural Resources

Since Alternative 6 would involve demolition of portions of the Beverly Hilton property which are eligible for listing in the California Register, Alternative 6's impacts on historic resources would be comparable to those associated with the proposed project. Therefore, Alternative 6 would not be considered environmentally superior to the proposed project with respect to cultural resources impacts.

Geology and Soils

Since Alternative 6 would construct the same number of buildings and subterranean parking structures as the proposed project, and would comply with the Uniform Building Code, Alternative 6 would result in similar geology impacts as those associated with the proposed project. Therefore, Alternative 6 is not considered environmentally superior to the proposed project with respect to geology and soils impacts.

Hazards and Hazardous Materials

Similar to the proposed project, Alternative 6 would develop land uses which would not generate or use large quantities of hazardous and/or toxic materials. Also similar to the proposed project, Alternative 6 would remove asbestos-containing materials (ACM), lead-based paints (LBPs) and polychlorinated biphenyls (PCBs) during construction in accordance with SCAQMD and mitigation measures similar to the proposed project. Therefore, Alternative 6 would result in comparable hazards impacts to the proposed project and would not be considered environmentally superior to the proposed project relative to hazards.

Hydrology and Water Quality

Similar to the proposed project, construction activities under Alternative 6 would be subject to National Pollution Discharge Elimination System (NPDES) Permit requirements, and a Storm Water Pollution Prevention Plan (SWPPP) would be prepared. Also similar to the proposed project, Alternative 6 would develop land uses which have the potential to affect surface and ground water quality by generating urban runoff. Therefore, Alternative 6 would result in comparable hydrology impacts to the proposed project and would not be considered environmentally superior to the proposed project relative to hydrology and water quality impacts.

Land Use and Planning

Since Alternative 6 would implement building heights that are stepped-back and generally reduced to be more consistent with the surrounding structures, Alternative 6 would result in a less severe conflict with the Land Use Element of the City's General Plan than would the proposed project. Alternative 6 would still conflict with one program within the Conservation Element and would still require adoption of a Specific Plan, an amendment to the General Plan land use designation and a zone change. However, due to the reduced conflict with the Land Use Element, Alternative 6 would result in fewer land use impacts than the proposed project. Therefore, Alternative 6 would be considered environmentally superior to the proposed project relative to land use impacts.

Noise

Noise impacts are evaluated in two categories: construction noise sources and operational noise sources. Construction-related noise sources are associated with construction activities such as demolition, earthmoving, and the use of construction equipment. Operational noise is primarily associated with stationary sources such as rooftop mechanical equipment and mobile sources such as vehicles traveling to and from the project site.

Construction

Under Alternative 6, the project would be reduced to 450 hotel rooms and 84 condominium units. Due to the unit reduction and overall reduction in building mass, the extent of construction activity required for this alternative would be slightly less than that of the proposed project. Therefore, Alternative 6 would generate incrementally less severe construction-related noise and groundborne vibration. However, given the fact that extensive excavation and construction activities would occur within close proximity of sensitive receptors to the north, east, and west of the project site, construction noise impacts, resulting from construction activities occurring outside hours permitted by the noise ordinance, as well as groundborne vibration impacts would still remain significant. Since construction-related noise and groundborne vibration impacts would remain significant, Alternative 6 is not considered environmentally superior to the proposed project with respect to construction-related noise and groundborne vibration.

Operation

During operation, Alternative 6 would result in fewer daily trips than the proposed project. Therefore, the associated roadway noise would be less severe than that associated with the proposed project. As such, Alternative 6 would result in fewer operational impacts and is considered environmentally superior when compared to the proposed project with respect to operational noise.

Population and Housing

Alternative 6 would reduce the total number of condominium units to 84 units and the total number of hotel rooms to 450 rooms. Therefore, impacts related to housing, population, and employment growth would be incrementally lower under Alternative 6 as compared to the proposed project. However, no growth projections established by SCAG would be exceeded under either development scenario. As such, Alternative 6 is not considered environmentally superior to the proposed project with respect to population, housing, or employment growth.

Public Services

Fire Protection

Since Alternative 6 would generally reduce building height and the number of condominium units, Alternative 6 would result in fewer fire protection impacts than the proposed project. Therefore, Alternative 6 is considered environmentally superior to the proposed project with respect to fire protection impacts.

Police Protection

Since Alternative 6 would reduce the number of condominium units and thus the number of project residents, Alternative 6 would result in fewer police service calls than the proposed project. Therefore, Alternative 6 is considered environmentally superior to the proposed project with respect to police protection impacts.

Schools

Since Alternative 6 would generate fewer new students than the proposed project, Alternative 6 would result in fewer impacts to schools than the proposed project. Therefore, Alternative 6 is considered environmentally superior to the proposed project relative to public schools.

Recreation and Parks

Since Alternative 6 would generate fewer new City residents than the proposed project, Alternative 6 would result in fewer recreation and parks impacts than the proposed project. Therefore, Alternative 6 is considered environmentally superior to the proposed project relative to recreation and parks.

Library Services

Since Alternative 6 would generate fewer new City residents than the proposed project, Alternative 6 would result in fewer library service impacts than the proposed project. Therefore, Alternative 6 is considered environmentally superior to the proposed project with respect to library impacts.

Transportation, Traffic, Parking and Circulation

Under Alternative 6, the hotel component of the project would be reduced to 450 rooms while the residential component of the project would be reduced to 84 condominiums. This would result in a lower trip generation than that of the proposed project, as shown in **Table 5.0-2, Proposed Project and Alternative 6 Trip Generation**.

Table 5.0-2
Proposed Project and Alternative 6 Trip Generation

	Daily	AM	Midday	PM	Saturday
Proposed Project	5,136	251	364	388	215
Alternative 6	4,441	212	316	335	185

Source: Fehr and Peers.

Alternative 6 would impact the same intersections as the proposed project during both the AM and PM peak hours. However, due to the reduction in the number of trips associated with this alternative, impacts to future traffic and the levels of service for intersections and roadways in the project vicinity would be less severe than those associated with the proposed project.

Due to the reduction in the number of hotel rooms and condominium units, parking demand under Alternative 6 would be lower than the demand under the proposed project. The number of parking spaces supplied under Alternative 6 would meet the parking demand and would be consistent with the City of Beverly Hills Municipal Code requirements. As such, adequate parking would be provided to accommodate anticipated demand associated with the implementation of Alternative 6 and no significant parking impacts would result.

Alternative 6 would result in fewer trip impacts on transportation and traffic due to the reduced trip generation. Consequently, this alternative is considered environmentally superior to the proposed project relative to transportation, traffic, circulation, and parking.

Utilities and Service Systems

Water

Due to the reduction in the number of condominium units and hotel rooms, Alternative 6 would generate a lower annual water demand than the proposed project. Therefore, Alternative 6 would result in fewer water impacts than the proposed project. As such, Alternative 6 is considered environmentally superior to the proposed project relative to water impacts.

Wastewater

Due to the reduction in the number of condominium units and hotel rooms, Alternative 6 would generate a lower annual quantity of wastewater than the proposed project. Therefore, Alternative 6 would result

in fewer wastewater impacts than the proposed project. Consequently, Alternative 6 is considered environmentally superior to the proposed project relative to wastewater impacts.

Solid Waste

Due to the reduction in the number of condominium units and hotel rooms, Alternative 6 would generate a lower annual quantity of solid waste than the proposed project. Therefore, Alternative 6 would result in fewer solid waste impacts than the proposed project. As such, Alternative 6 is considered environmentally superior to the proposed project relative to solid waste impacts.

Energy

Electricity

Due to the reduction in the number of condominium units and hotel rooms, Alternative 6 would have a lower electricity demand than the proposed project. Therefore, Alternative 6 would result in fewer electricity impacts than the proposed project. Consequently, Alternative 6 is considered environmentally superior to the proposed project relative to electricity impacts

Natural Gas

Due to the reduction in the number of condominium units and hotel rooms, Alternative 6 would have a lower natural gas demand than the proposed project. Therefore, Alternative 6 would result in fewer natural gas impacts than the proposed project. As such, Alternative 6 is considered environmentally superior to the proposed project relative to natural gas impacts.

Relationship to Project Objectives

As such, this alternative would achieve all of the project objectives identified in Section 3.0, Project Description, of the Draft EIR.

Conclusion

Implementation of Alternative 6 would reduce two of the significant and unavoidable impacts associated with implementing the proposed project.

- **Aesthetics and Views** – Project implementation would result in significant and unavoidable project impacts and contributions to cumulatively significant aesthetic impacts because of inconsistency with Land Use Element Objectives 3, Areas of Transitional Conflict, and 4, Scale of the City, and with Land Use development criteria addressing compatibility of commercial and residential land uses. The project would also have significant and unavoidable impacts on valued views of the hotel from the

intersection of Wilshire and Santa Monica Boulevard and on panoramic west-facing views from the hotel's Wilshire Tower guestrooms. Considered together with the adjacent 9900 Wilshire project, the project would also contribute to cumulatively significant impacts on panoramic views from the hotel's Wilshire Tower guestrooms.

- **Land Use and Planning** – The project would result in significant and unavoidable project-level and cumulative impacts related to inconsistency with General Plan Land Use Element Objectives 3, Areas of Transitional Conflict, and 4, Scale of the City, and with Land Use Element development criteria recommending compatibility between commercial and residential areas. The project would also result in significant and unavoidable project-level and cumulative impacts related to inconsistency with goals related to landmark preservation in the General Plan Conservation Element. No feasible mitigation exists to reduce these impacts to less than significant levels.

The following significant impacts identified for the proposed project would still occur with implementation of this alternative:

- **Air Quality** – During project construction, NO_x, PM₁₀, and PM_{2.5} emissions would exceed SCAQMD established significance thresholds and result in significant unavoidable impacts would result, even after incorporation of mitigation.
- **Cultural Resources** – Demolition of portions of The Beverly Hilton, including the Wilshire Edge building, pedestrian entry area, pool, and former Trader Vic's restaurant, and the introduction of four new buildings to the project site, would result in significant and unavoidable impacts to an historic resource, as defined in Section 15064.5 of the CEQA Guidelines, even after incorporation of mitigation. Demolition of portions of The Beverly Hilton, considered together with demolition of the Robinsons-May building, would contribute to cumulatively significant impacts on cultural resources.
- **Noise** – Project construction outside the hours specified in the City's noise ordinance would result in significant and unavoidable project-level and cumulative off-site noise impacts, even after incorporation of mitigation.
- **Groundborne Vibration** – Project construction would result in ground vibrations that exceed the Federal Railway Administration (FRA) groundborne vibration threshold, resulting in project-level and cumulative significant and unavoidable impacts at off-site sensitive receptors, even after incorporation of mitigation.
- **Construction Traffic** – Project construction would result in a considerable, and therefore significant, contribution to cumulatively significant traffic impacts as a result of the potential overlapping construction phases of the Beverly Hilton Revitalization Plan and 9900 Wilshire projects.

No additional significant impacts above and beyond those identified for the proposed project would result from implementation of Alternative 6. Additionally, Alternative 6 would reduce many impacts, in comparison to the proposed project, relative to aesthetics, construction-related and operational air quality, operational noise, population and housing, public services, transportation and traffic, and utilities and service systems.

Alternative 7 – Additional Parking Level (Variation on the Proposed Project)

Alternative 7 is a minor variation on the proposed project-related parking supply and configuration, but does not change any other proposed project components. Alternative 7 proposes construction of an additional subterranean parking level, level P4, to match the dimensions of subterranean parking level P3, already proposed as part of the project. Under Alternative 7, 311 new parking spaces would be provided in level P4 for use by the general public and employees of the Business Triangle. Alternative 7 keeps all other components of the proposed project unchanged, including building heights, setbacks, Floor Area Ratio, and roadway improvements.

The floor plans for all parking levels are shown in **Figures 5.0-2 through 5.0-5**.

Aesthetics

Alternative 7 would differ from the proposed project only in the addition of another underground level of parking for use by the general public. No at-grade or above-grade changes to any of the buildings, site plan layout, or parking structure ingress or egress are planned.

Consequently, impacts related to aesthetics and views would be identical to those under the proposed project. As with the proposed project, this alternative still proposes increased intensity of uses on-site, introduces residential uses, and proposes building heights in excess of those in the project area, which comparable to the proposed project. Moreover, significant view impacts associated with the proposed project (views of Wilshire Tower from the intersection of Wilshire and Santa Monica to the east, and views west from west-facing guestrooms in Wilshire Tower) would still occur under this alternative.

Therefore, this alternative is not considered environmentally superior to the proposed project relative to Aesthetic Character and Views.

Light and Glare

Impacts related to Light and Glare would be identical to those under the proposed project, since the only component of this alternative is the addition of an underground parking level. This alternative is not considered environmentally superior to the proposed project with respect to Light and Glare.

Shade and Shadow

Since building height, configuration, and footprint would be the same under both Alternative 7 and the proposed project, shading and shadow impacts would also be the same. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to shade and shadow impacts.

Air Quality

Air quality impacts are evaluated in two categories: construction emissions and operational emissions. Construction-related emissions are associated with construction activities such as demolition, earthmoving, use of construction equipment, and application of coatings to surfaces. Operational emissions are primarily associated with mobile source emissions based on vehicle trips generated by the project.

Construction

Alternative 7 would involve demolition of the same structures as the proposed project, but would construct an additional level of parking relative to the proposed project. Therefore, because additional excavation and soil hauling would occur as a result of the additional level of parking, Alternative 7 would potentially result in greater construction impacts relative to the proposed project. Alternative 7 is not considered environmentally superior to the proposed project relative to air quality construction impacts.

Operation

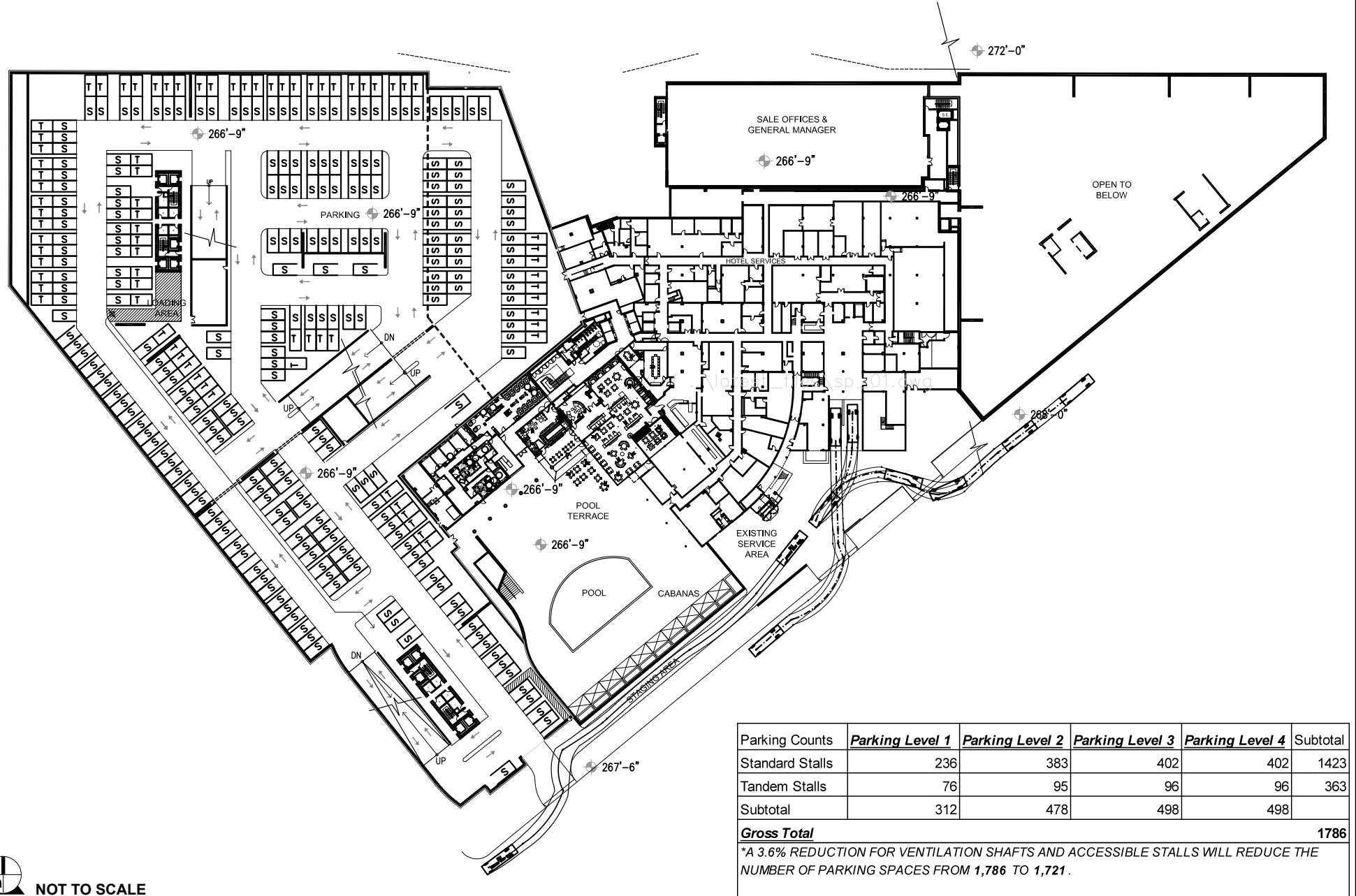
Alternative 7 would implement the same operational uses as the proposed project. The additional parking level is not expected to impact operational air quality emissions. Therefore, Alternative 7 would result in comparable operational impacts to the proposed project and is not considered environmentally superior to the proposed project relative to air quality operational impacts.

Cultural Resources

Since Alternative 7 would involve demolition of portions of the Beverly Hilton property which are eligible for listing in the California Register, Alternative 7's impacts on historic resources would be comparable to those associated with the proposed project. Therefore, Alternative 7 would not be considered environmentally superior to the proposed project with respect to cultural resources impacts.

Geology and Soils

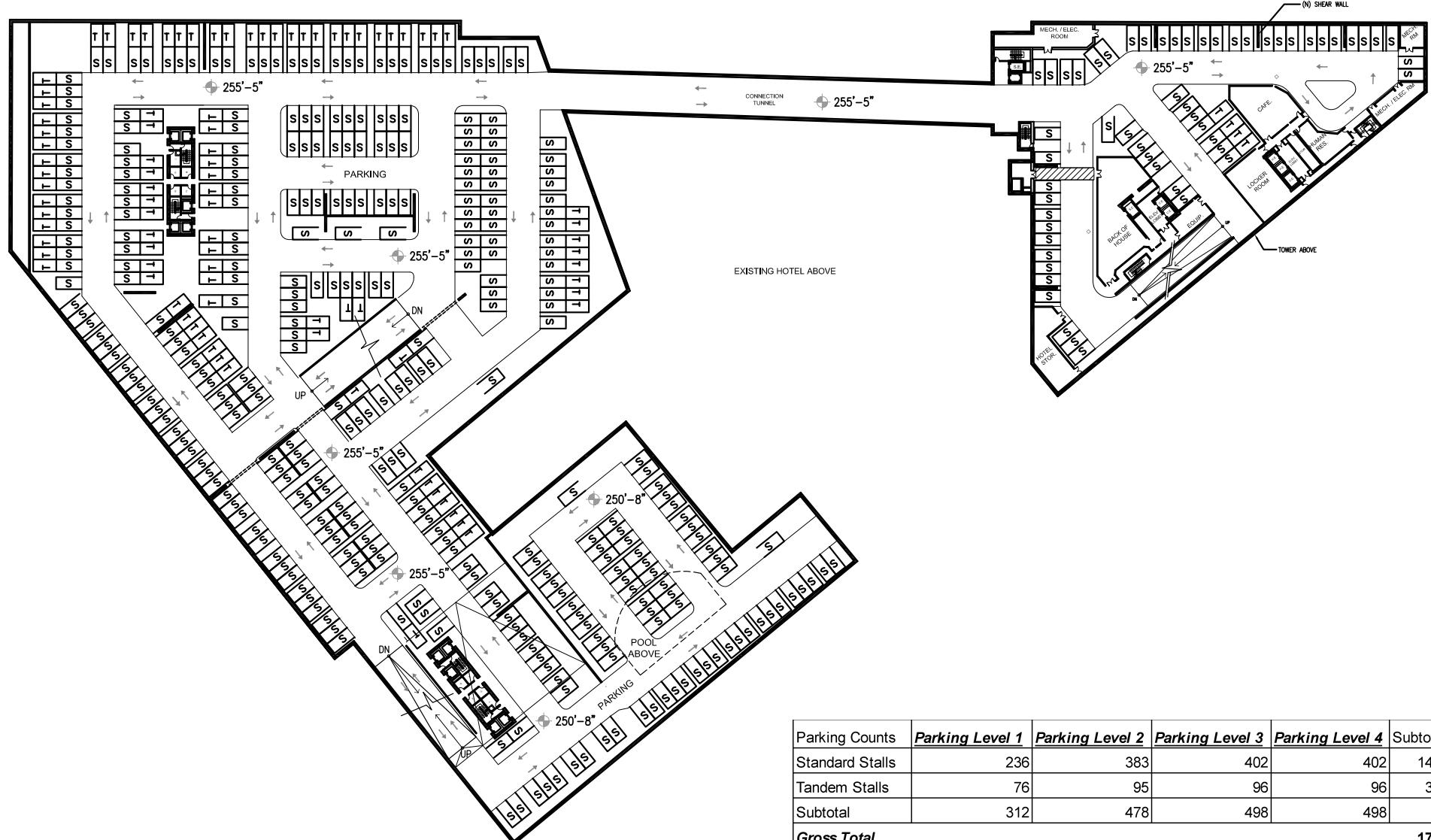
Since Alternative 7 would develop an additional level of subterranean parking, Alternative 7 would require additional excavation, which would result in incrementally greater geological impacts than the proposed project. Therefore, Alternative 7 would not be considered environmentally superior to the proposed project with respect to geology and soils.



SOURCE: The Beverly Hills Revitalization Plan, Gensler - September 2007

FIGURE 5.0-2

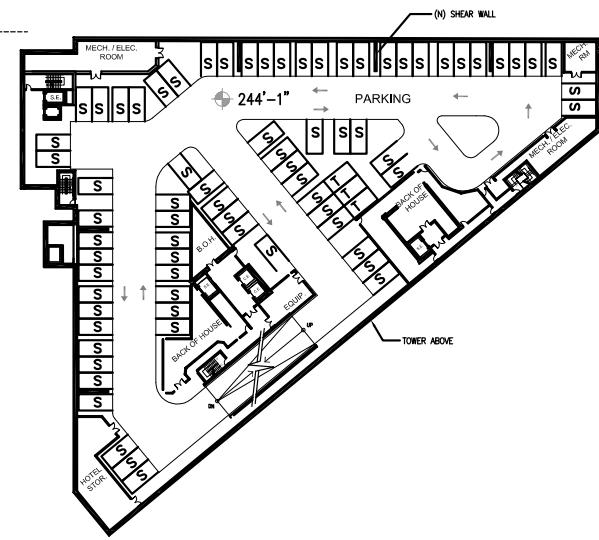
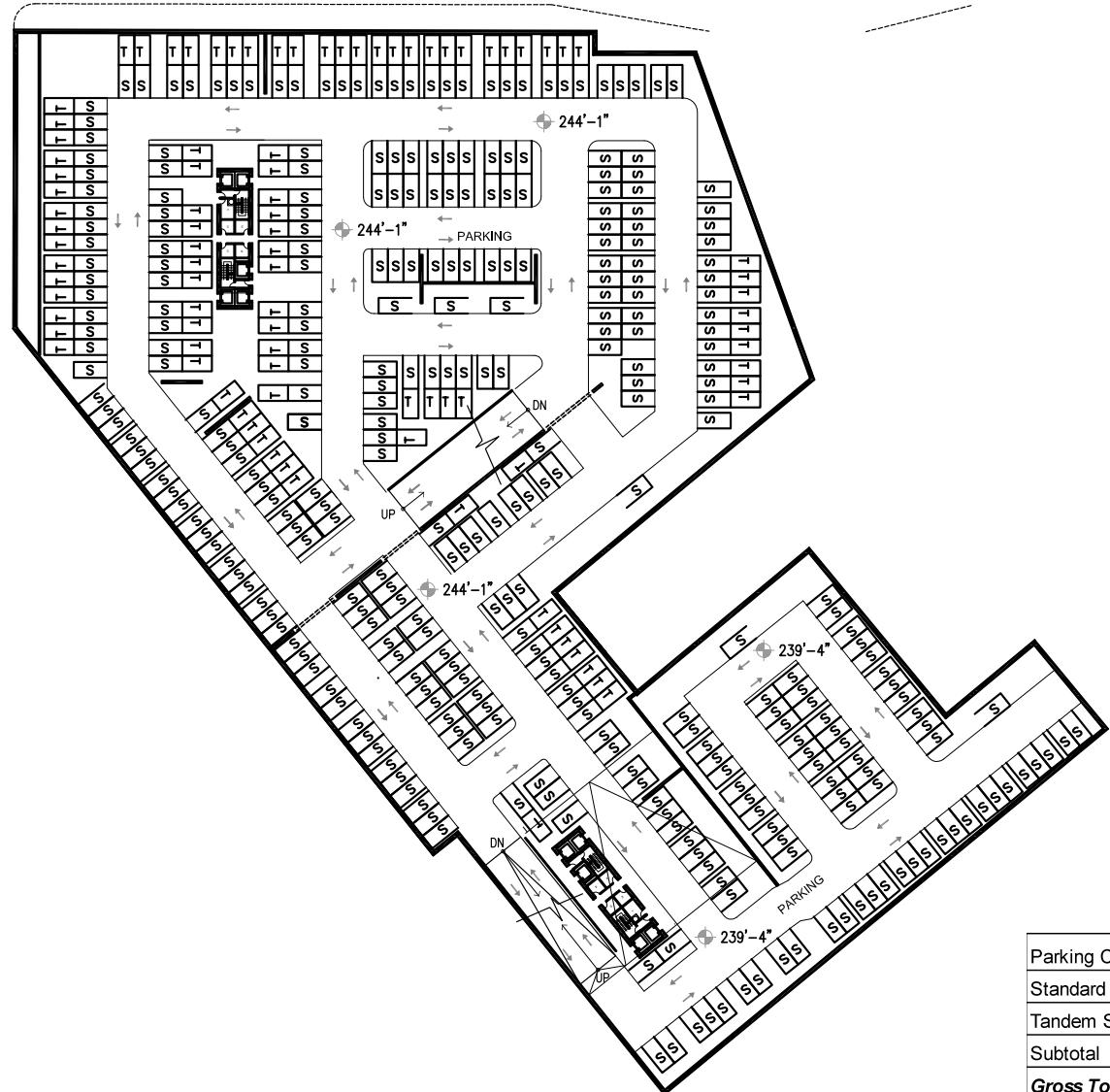
Alternative 7, Additional Parking Level (Variation on the Proposed Project) - Parking Level 1



SOURCE: The Beverly Hills Revitalization Plan, Gensler - September 2007

FIGURE 5.0-3

Alternative 7, Additional Parking Level (Variation on the Proposed Project) - Parking Level 2



Parking Counts	Parking Level 1	Parking Level 2	Parking Level 3	Parking Level 4	Subtotal
Standard Stalls	236	383	402	402	1423
Tandem Stalls	76	95	96	96	363
Subtotal	312	478	498	498	

Gross Total 1786

*A 3.6% REDUCTION FOR VENTILATION SHAFTS AND ACCESSIBLE STALLS WILL REDUCE THE NUMBER OF PARKING SPACES FROM 1,786 TO 1,721.



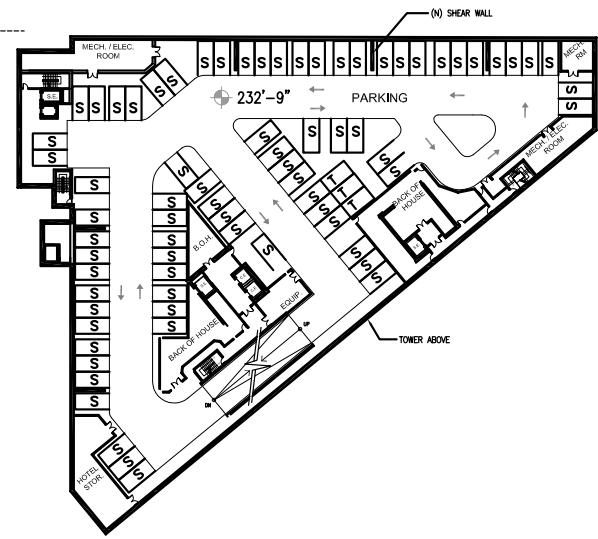
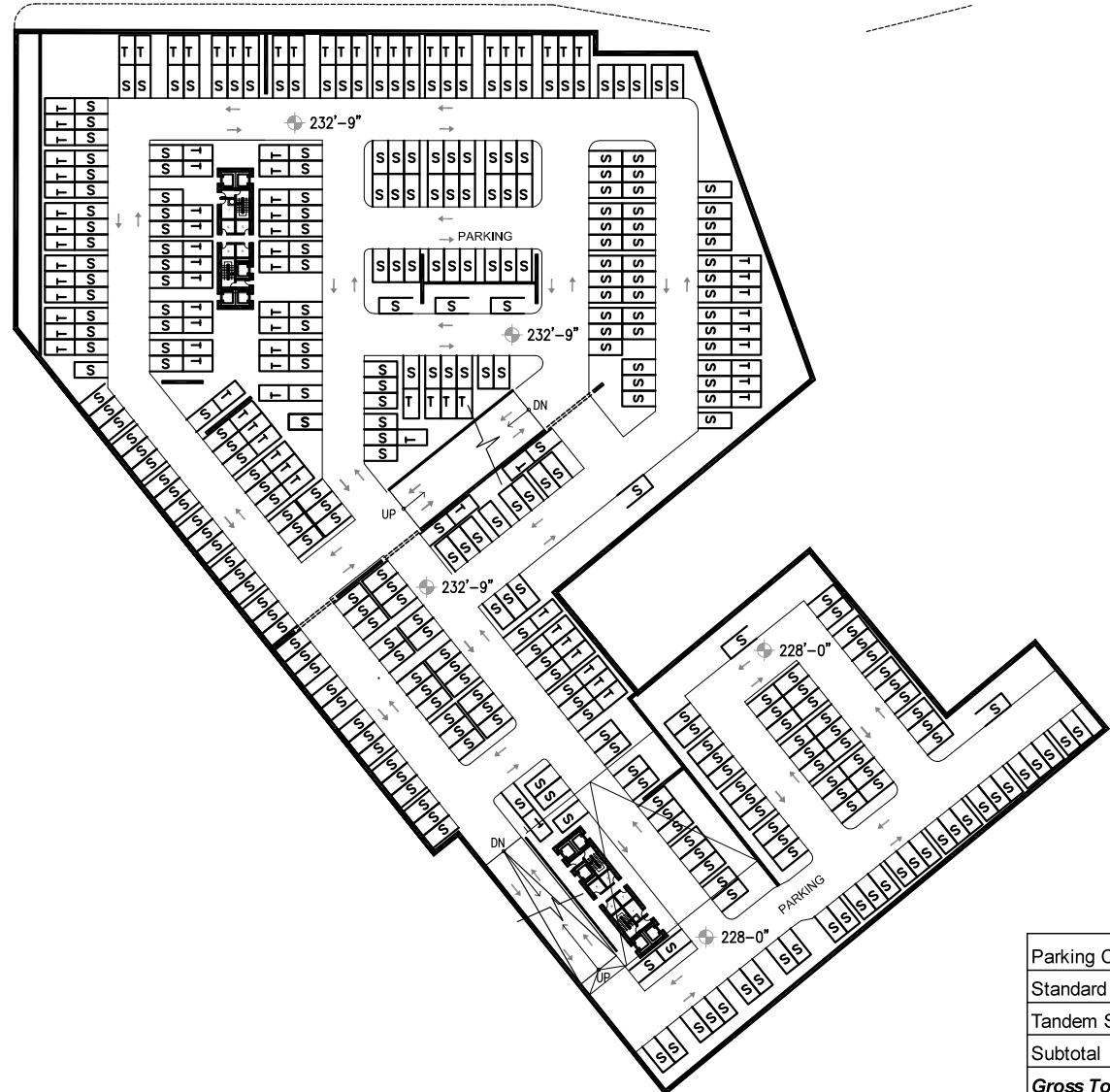
NOT TO SCALE

SOURCE: The Beverly Hills Revitalization Plan, Gensler - September 2007

FIGURE 5.0-4



Alternative 7, Additional Parking Level (Variation on the Proposed Project) - Parking Level 3



Parking Counts	Parking Level 1	Parking Level 2	Parking Level 3	Parking Level 4	Subtotal
Standard Stalls	236	383	402	402	1423
Tandem Stalls	76	95	96	96	363
Subtotal	312	478	498	498	
Gross Total					1786
*A 3.6% REDUCTION FOR VENTILATION SHAFTS AND ACCESSIBLE STALLS WILL REDUCE THE NUMBER OF PARKING SPACES FROM 1,786 TO 1,721.					



NOT TO SCALE

SOURCE: The Beverly Hills Revitalization Plan, Gensler - September 2007

FIGURE 5.0-5



Alternative 7, Additional Parking Level (Variation on the Proposed Project) - Parking Level 4

Hazards and Hazardous Materials

Similar to the proposed project, Alternative 7 would develop land uses which would not use or generate large quantities of hazardous and/or toxic materials. Alternative 7 would also remove ACM, LBPs, and PCBs during construction in accordance with SCAQMD and mitigation measures similar to those of the proposed project. Therefore, Alternative 7 would result in comparable hazards impacts to the proposed project and would not be considered environmentally superior to the proposed project relative to hazards.

Hydrology and Water Quality

Similar to the proposed project, construction activities under Alternative 7 would be subject to NPDES Permit requirements, and an SWPPP would be prepared. Also similar to the proposed project, Alternative 7 would develop land uses which have the potential to affect surface and ground water quality by generating urban runoff. Therefore, Alternative 7 would result in comparable hydrology impacts to the proposed project and would not be considered environmentally superior to the proposed project relative to hydrology and water quality impacts.

Land Use and Planning

Since Alternative 7 would conflict with the same applicable land use plans, policies, and regulations as the proposed project, impacts relative to land use consistency would be comparable to those associated with the proposed project and therefore Alternative 7 would not be considered environmentally superior to the proposed project with respect to land use and planning impacts.

Noise

Noise impacts are evaluated in two categories: construction noise sources and operational noise sources. Construction-related noise sources are associated with construction activities such as demolition, earthmoving, and the use of construction equipment. Operational noise is primarily associated with stationary sources such as rooftop mechanical equipment and mobile sources such as vehicles traveling to and from the project site.

Construction

Alternative 7 would construct an additional level of subterranean parking, but would not change the building mass or any other features of the proposed project. Therefore, the extent of construction activity required for this alternative would be slightly greater than that under the proposed project. However, construction activity associated with the additional level of subterranean parking would not result in a

substantial increase in construction noise and groundborne vibration. Therefore, Alternative 7 is not considered environmentally superior to the proposed project with respect to construction-related noise and groundborne vibration.

Operation

During operation, Alternative 7 would result in the same trip generation as the proposed project. Since the number of trips would be the same under both this alternative and the proposed project, the associated roadway noise would also be the same. Therefore, the alternative would result in the same operational noise impacts as the proposed project. Since neither this alternative nor the proposed project would result in significant operational noise impacts, Alternative 7 is not considered environmentally superior with respect to operational noise.

Population and Housing

Since Alternative 7 would generate the same quantity of condominium units and jobs as the proposed project, Alternative 7 would result in similar population, housing, and employment impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior with respect to population, housing, or employment growth.

Public Services

Fire Protection

Since Alternative 7 would develop the same building heights and land uses as the proposed project, Alternative 7 would result in similar fire protection impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project with respect to fire protection.

Police Protection

Since Alternative 7 would generate the same number of police service calls as the proposed project, Alternative 7 would result in similar police protection impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project with respect to police protection.

Schools

Since Alternative 7 would generate the same number of new students as the proposed project, Alternative 7 would result in similar school impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to schools.

Recreation and Parks

Since Alternative 7 would generate the same number of new City residents as the proposed project, Alternative 7 would result in similar recreation and park impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to recreation and parks.

Library Services

Since Alternative 7 would generate the same number of new City residents as the proposed project, Alternative 7 would result in similar library services impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to library services.

Transportation, Traffic, Parking and Circulation

Alternative 7 would implement the same number of condominium and hotel units and the same square footage of retail and restaurant space. Therefore, Alternative 7 would result in the same project-related trip generation as the proposed project. However, Alternative 7 would provide an additional level of subterranean parking in excess of the project-related parking demand to be used for public parking and employees of the Business Triangle. Therefore, Alternative 7 would result in increased trip generation when compared to the proposed project, as shown in **Table 5.0-3, Comparison of Proposed Project and Alternative 7 Trip Generation**, below. Consequently, this alternative would result in increased traffic impacts when compared to the proposed project and is not considered environmentally superior to the proposed project relative to transportation, traffic, circulation, and parking.

Table 5.0-3
Comparison of Proposed Project and Alternative 7 Trip Generation

	Daily	AM	Midday	PM	Saturday
Proposed Project	5,136	251	364	388	215
Alternative 7	6,311	338	599	583	449

Utilities and Service Systems

Water

Since Alternative 7 would generate the same annual water demand as the proposed project, Alternative 7 would result in similar water impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to water impacts.

Wastewater

Since Alternative 7 would generate the same annual quantity of wastewater as the proposed project, Alternative 7 would result in similar wastewater impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to wastewater impacts.

Solid Waste

Since Alternative 7 would generate the same annual quantity of solid waste as the proposed project, Alternative 7 would result in similar solid waste impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to solid waste impacts.

Energy

Electricity

Since Alternative 7 would generate the same electricity demand as the proposed project, Alternative 7 would result in similar electricity impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to electricity impacts.

Natural Gas

Since Alternative 7 would generate the same natural gas demand as the proposed project, Alternative 7 would result in similar natural gas impacts to the proposed project. Therefore, Alternative 7 is not considered environmentally superior to the proposed project relative to natural gas impacts.

Relationship to Project Objectives

Alternative 7 would result in the implementation of the same land uses proposed by the project; however, an additional level of subterranean parking would be added. As such, all project objectives

identified in Section 3.0, Project Description of the Draft EIR would be met under Alternative 7 to the same extent as they would with implementation of the proposed project.

Conclusion

Implementation of Alternative 7 would result in the same significant and unavoidable impacts associated with implementing the proposed project. These significant and unavoidable adverse impacts include:

- **Aesthetics and Views** – Project implementation would result in significant and unavoidable project impacts and contributions to cumulatively significant aesthetic impacts because of inconsistency with Land Use Element Objectives 3, Areas of Transitional Conflict, and 4, Scale of the City, and with Land Use development criteria addressing compatibility of commercial and residential land uses. The project would also have significant and unavoidable impacts on valued views of the hotel from the intersection of Wilshire and Santa Monica Boulevard and on panoramic west-facing views from the hotel's Wilshire Tower guestrooms. Considered together with the adjacent 9900 Wilshire project, the project would also contribute to cumulatively significant impacts on panoramic views from the hotel's Wilshire Tower guestrooms.
- **Air Quality** – During project construction, NO_x, PM₁₀, and PM_{2.5} emissions would exceed SCAQMD established significance thresholds and result in significant unavoidable impacts would result, even after incorporation of mitigation.
- **Cultural Resources** – Demolition of portions of The Beverly Hilton, including the Wilshire Edge building, pedestrian entry area, pool, and former Trader Vic's restaurant, and the introduction of four new buildings to the project site, would result in significant and unavoidable impacts to an historic resource, as defined in Section 15064.5 of the *CEQA Guidelines*, even after incorporation of mitigation. Demolition of portions of The Beverly Hilton, considered together with demolition of the Robinsons-May building, would contribute to cumulatively significant impacts on cultural resources.
- **Land Use and Planning** – The project would result in significant and unavoidable project-level and cumulative impacts related to inconsistency with General Plan Land Use Element Objectives 3, Areas of Transitional Conflict, and 4, Scale of the City, and with Land Use Element development criteria recommending compatibility between commercial and residential areas. The project would also result in significant and unavoidable project-level and cumulative impacts related to inconsistency with goals related to landmark preservation in the General Plan Conservation Element. No feasible mitigation exists to reduce these impacts to less than significant levels.
- **Noise** – Project construction outside the hours specified in the City's noise ordinance would result in significant and unavoidable project-level and cumulative off-site noise impacts, even after incorporation of mitigation.
- **Groundborne Vibration** – Project construction would result in ground vibrations that exceed the FRA groundborne vibration threshold, resulting in project-level and cumulative significant and unavoidable impacts at off-site sensitive receptors, even after incorporation of mitigation.

- **Construction Traffic** –Project construction would result in a considerable, and therefore significant, contribution to cumulatively significant traffic impacts as a result of the potential overlapping construction phases of the Beverly Hilton Revitalization Plan and 9900 Wilshire projects.

Alternative 7 would add an additional level of parking for use by the public, and would therefore result in additional project-related vehicle trips. As such, all impacts associated with this project alternative would be comparable to impacts associated with the proposed project; however more vehicle trips would be generated.

5.3 SUMMARY OF ANALYSIS

Table 5.0-4, The Beverly Hilton Revitalization Plan Alternative Variations Analysis Comparison Summary, provides a comparison of the impacts associated with each alternative relative to the proposed project based upon analyses provided in the Draft EIR and to the Planning Commission on November 1, 2007. Where the project alternative would be environmentally superior (result in fewer impacts) to the proposed project, a plus (+) symbol is shown; where the project alternative would result in impacts greater than those associated with the proposed project, a minus (-) symbol is shown. Where an alternative's impacts are comparable (similar) to those of the proposed project, an equals (=) symbol is shown.

Table 5.0-4
The Beverly Hilton Revitalization Plan
Alternative Variations Analysis Comparison Summary

Environmental Issue Area	Alternative 6 – Variation on Alternative 4	Alternative 7 – Variation on Project
Aesthetics and Views	=	=
Light and Glare	=	=
Shade and Shadow	+	=
Air Quality – Construction	+	-
Air Quality – Operation	+	=
Cultural Resources	=	=
Geology and Soils	=	-
Hazards and Hazardous Materials	=	=
Hydrology and Water Quality	=	=
Land Use and Planning	+	=
Noise – Construction	=	-
Noise – Operation	+	=
Population and Housing	=	=
Fire	+	=
Police	+	=
Schools	+	=
Recreation and Parks	+	=
Libraries	+	=
Transportation and Traffic	+	=
Water	+	=
Wastewater	+	=
Solid Waste	+	=
Electricity	+	=
Natural Gas	+	=