

## VI. ALTERNATIVES

### A. INTRODUCTION

#### Regulatory Guidelines for Selecting Project Alternatives

The identification and analysis of alternatives is a fundamental concept under CEQA. The role of alternatives in an EIR is clearly set forth within the CEQA Statutes, California Public Resources Code, Section 21000 et seq. Specifically, Public Resources Code, Section 21002.1 (a) states that:

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

California Code of Regulations, Title 14, Chapter 13 (CEQA Guidelines) Section 15126.6 provides some guidance on the formulation of alternatives:

"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."

Thus, an EIR for any project subject to CEQA review must consider a reasonable range of alternatives to the project, or to the location of the project, which:

- (1) offer substantial environmental advantages over the project proposal (Public Resources Code, Section 21002); and
- (2) may be "feasibly accomplished in a successful manner" considering the economic, environmental, social and technological factors involved (Public Resources Code, Section 21061.1).

In determining the nature and scope of alternatives to be examined in an EIR, local agencies are guided by the doctrine of "feasibility." Public Resources Code, Section 21002 states that "it is the policy of the State that public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.... [I]n the event specific economic, social, or other conditions make infeasible such project alternatives or such mitigation measures, individual projects may be approved in spite of one or more significant effects thereof."

The Legislature has defined "feasible," for purposes of CEQA review, as "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors." (See Public Resources Code, Section 21061.1; CEQA Guidelines, Section 15364.)

The range of alternatives required within an EIR is governed by the "rule of reason" which requires an EIR to set forth only those alternatives necessary to permit a reasoned choice. The CEQA Guidelines direct that the discussion of alternatives shall be limited to those alternatives that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Of those alternatives, only the ones that could feasibly attain most of the basic objectives of the project need be examined. While there is no rule for the number of alternatives that must be discussed, the EIR must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation, but need not consider every conceivable alternative to a project. Furthermore, an EIR need not consider an alternative whose implementation is remote and speculative or whose effects cannot be reasonably ascertained.

The CEQA Guidelines provide that the degree of analysis required need not be exhaustive, but rather should be at a level of detail that is reasonably feasible. Under the standards for adequacy, the EIR must contain “a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences.” The analysis of environmental effects of project alternatives need not be as thorough or detailed as the analysis of the project itself. Rather, the CEQA Guidelines state that the EIR shall include “sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.”

Alternative locations should be discussed where any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. The CEQA Guidelines Section 15126.6(f)(2)(A) states that only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion on the EIR.” The Guidelines go on to state that “if the lead agency concludes that no feasible alternative locations exist, it must disclose the reasons for this conclusion, and should include the reasons in the EIR.” In addition, alternatives that were considered but were rejected as infeasible during the scoping process should be identified along with a reasonably detailed discussion of the reasons and facts supporting the conclusion that such alternatives were infeasible.

The CEQA Guidelines Section 15126.6(f)(1) provides additional factors that may be taken into account when addressing the feasibility of alternatives. These factors include:

“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.”

However, no one factor establishes a fixed limit on the scope of reasonable alternatives. Beyond these factors outlined above, CEQA establishes no categorical legal imperative as to the scope of alternatives to be analyzed in an EIR other than to require analysis of a "No Project" Alternative, which shall discuss the existing conditions at the time the notice of preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved...(CEQA Guidelines Section 15126.6(e)(2)). Otherwise, each case must be evaluated on its facts, which in turn must be reviewed in light of the statutory purpose.

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

## B. CRITERIA AND DESCRIPTION OF THE ALTERNATIVES TO BE ANALYZED

### Criteria For Selecting The Alternatives

As stated above, pursuant to CEQA, one of the criteria for defining project alternatives is the potential to attain most of the basic objectives of the Project. Established objectives of the Project applicant for the proposed Project are detailed in Chapter III. Project Description, and repeated below:

- Create a mixed-use commercial center, consistent with the purposes and intent of the Century City North Specific Plan, and the General Plan Framework.
- Preserve the high quality architectural character of Century City through the design of a Project that aesthetically and stylistically complements and enhances the contemporary feel of the area, including the development of appropriately scaled buildings, architectural detailing and landscape improvements.
- Revitalize the ABC Entertainment Center site, one of the older, under-utilized developments in Century City, by providing an economically productive and vibrant use of the property that benefits the community, reduces vacant properties, and stimulates the local economy.
- Provide an energy efficient and environmentally conscious development through such means as the use of recycled or otherwise energy efficient materials, state-of-the-art technologies, water saving devices and design elements that would save energy.
- Provide sufficient parking, to ensure that the parking needs of the Project's employees and visitors are met.
- Reduce vehicle trips, and the associated traffic, noise and air quality environmental impacts from those trips, by providing suitable pedestrian access to and from the site, to encourage Project occupants to shop and dine in the local area.
- Provide additional Class "A" office space, which both encourages and facilitates opportunities for businesses to locate in Century City, a designated Regional Center in the Los Angeles Framework Element of the City General Plan.
- Provide a Project that incorporates a pedestrian-oriented plaza, benches, shade, and attractive landscaping.
- Design a Project that is consistent with the predominant character and scale of Century City and the capacity of the local street system.
- Provide a cultural facility intended to house exhibition areas for one or more major cultural institutions, creating a cultural opportunity for both tenants of surrounding offices, as well as nearby residents and visitors.
- Provide sufficiently sized floor plates to meet the needs of current industry demands.
- Create attractive new dining opportunities, providing Century City with new choices for lunch or dinner at a range of price levels.

In addition to the requirement regarding alternatives ability to attain project objectives, a primary consideration in defining alternatives is their potential to reduce or eliminate significant impacts compared to the proposed Project. The impact analysis, as detailed in Section V of this EIR, concluded that the proposed Project generated no impacts that would remain significant after mitigation, except for potentially significant construction air quality and noise impacts. In light of this, the achievement of Project objectives was given more emphasis in designing and selecting alternatives.

### Alternatives Considered but Rejected

**Alternate Sites.** The CEQA Guidelines state that an EIR must "[d]escribe a range of reasonable alternatives to the project, *or to the location of the project*, which could feasibly attain the basic objectives of the project, and evaluate the comparative merits of the alternatives." (CEQA Guidelines, Section 15126.6(a), *italics added*.) As the italicized language suggests, Project alternatives typically fall into one

of two categories: on-site alternatives, which generally consist of different uses of the land under consideration; and off-site alternatives, which usually involve similar uses at different locations.

One of the Project objectives is to revitalize the ABC Entertainment Center site; consequently, any alternative that analyzes development of the proposed Project at an alternate location would be inconsistent with this stated objective.

Development of the proposed Project is dependent upon the utilization of vehicle trips that would be created by the demolition of the existing buildings and subsequent elimination of land uses. Therefore, any alternative that does not result in the creation of Replacement Trips through the demolition of existing structures is infeasible and not reasonably achievable. The Project applicant does not own or control any other properties within the Century City North Specific Plan area. While the availability of another property with a building suitable for demolition in the area is unclear, the economic consequences would render the acquisition of such a property impractical. Therefore, no other buildings can be considered candidates for demolition and no corresponding Replacement Trips would be created. For these reasons, the alternate site alternative is not reasonably achievable and is not analyzed further in this EIR.

**Retention of the Shubert Theater.** The Shubert Theater occupies 108,786 sq. ft. of the existing eight-story building located at 2020 Avenue of the Stars. Retention of the Shubert Theater would require either: 1) retention of the existing 2020 Avenue of the Stars building, and locating the office building on the southern portion of the Project site occupied by the 2040 Avenue of the Stars building; or 2) incorporate a similar-sized theater into the design of the office building.

The retention of the existing 2020 Avenue of the Stars building would not meet many of the stated Project objectives. The remaining office, restaurant, and retail space in the existing building has limited market value. The existing building does not have desirable floor plates, nor is it up to current structural and seismic codes. For these reasons, the retention of the existing Shubert Theater is not economically feasible and is not analyzed further in this EIR.

Incorporating a new large live theater into the office building's design would reduce the amount of office space available for lease. The applicant has indicated that given the limited success of the Shubert Theater; the cost to incorporate and maintain a live theater, combined with the reduced revenue from the reduction in office space renders the construction of a large live theater economically infeasible. For these reasons, the construction of a large live theater is not analyzed further in this EIR.

**Multi-Family Housing.** The Project site is currently developed with a mix of commercial uses including office, retail, restaurant, theater, and health club. See Section II Project Description for a breakdown of the square footages associated with each of the uses. Redevelopment of the Project site with a multi-family housing use as the primary land use, or a component of a mixed-use project would not meet the Project objectives as previously stated.

The subject property lies within the central commercial "core" area of the Century City North Specific Plan and has a zoning designation of C2-2-O. The C2-2-O zoning designation allows for several commercial land uses as well as residential. However, none of the lots within the "core" area are developed with residential uses. Implementation of residential uses would take away from the central commercial element of Century City and be inconsistent with the character of the area.

Additionally, it is the intent of the applicant to develop a "Class A" office building to encourage businesses to locate in Century City. A Multi-Family housing development or component is not consistent with this objective; therefore, construction of a multi-family housing project is not analyzed further in this EIR.

## Alternatives Chosen for Evaluation

Considering the factors above, numerous alternatives were entertained and four, including the “No Project Alternative,” were evaluated as described below and in **Table VI-1**. The proposed Project site is 14.02 acres in size and includes the Century Plaza Towers. However, the Project does not propose to modify any areas outside of the 9.2 acre portion to be redeveloped. Accordingly, all alternatives are assumed to fit within the 9.2 acre portion of the Project site to be redeveloped. For clarity, the rest of this analysis lists only the floor areas of the area to be redeveloped and not include any square footage from the Century Plaza Towers.

**1. No Project Alternative.** This alternative assumes that no changes to the site occur. The existing structures would remain, and their current condition would be unchanged. Analysis of this alternative will also include an assessment of the impact of the site fully occupied, but otherwise unchanged. This alternative considers impacts associated with the existing 287,701 sq. ft.<sup>61</sup> of office space; 57,316 sq. ft. of commercial retail space; a 39,695 sq. ft. (1,751 seats) movie theater; a 108,786 sq. ft. (2,250 seats) live theater; 144,390 sq. ft. of restaurant areas; paved plaza; and subterranean parking structure. Total floor space within the area to be redeveloped would be 678,822 sq. ft. The site as a whole, including the

Century Plaza Towers would contain a total floor area of 3,067,338 sq. ft. on a site totaling 610,834 sq. ft. (14.023 acres). This results in an FAR of 5:1. This alternative satisfies a direct requirement in CEQA for a No Project Alternative comparison.

**2. All Office Alternative.** This alternative includes the demolition of the two eight-story buildings at 2020 and 2040 Avenue of the Stars, replaced by a single 39-story building. The proposed alternative would provide 1,276,488 sq. ft. of class “A” office space, eight levels of parking, pedestrian corridor, and a landscaped plaza. The FAR would be 6:1. This alternative was selected because it is a feasible alternative that maximizes the economic value of the proposed site and meets many, but not all, of the stated Project objectives.

**3. Hotel, Retail and Entertainment Alternative.** The third alternative consists of a 750-room hotel within a 20-story, 618,750 sq. ft. building (including 26,000 sq. ft. banquet facilities); 154,000 sq. ft. of retail space; 65,900 sq. ft. of entertainment retail 88,100 sq. ft. of entertainment restaurant space; pedestrian corridor, and a landscaped plaza. This proposal currently would be allowed under the Century City North Specific Plan and would require no amendments. The FAR would be 5.4:1 based upon a total of 926,750 sq. ft. of development on the Project site.

This alternative was selected to compare the impacts resulting from a mixed use development that transfers density from office, retail and cultural uses to hotel, retail and entertainment uses. The analysis of this alternative is useful in comparing traffic, land use, and aesthetic (i.e. height and building intensity) impacts resulting from various use mixes on the Project site.

**4. Reduced Density Alternative.** This alternative would replace the two eight-story buildings at 2020 and 2040 Avenue of the Stars, with a single seven-story building. The proposed alternative would provide 500,000 sq. ft. of class “A” office space, eight levels of parking, and a landscaped plaza. The site FAR would be 4.7:1. This alternative was selected because it approximately represents a one-third reduction from the proposed Project.

The impacts of the four selected alternatives are evaluated in comparison to the impacts of the proposed Project in Section C through F, below. The impact conclusions are summarized in **Table VI-2**, for easy comparison.

<sup>61</sup> All building areas are expressed in Floor Area as defined by the Century City North Specific Plan, unless otherwise noted.

**TABLE VI-1 [Insert Excel Table VI-1 - Alternatives Land Use Summary Table**

**Insert Excel - Table VI-2, ALTERNATIVES IMPACT COMPARISON SUMMARY**

### C. ANALYSIS OF ALTERNATIVE 1: NO PROJECT ALTERNATIVE

This alternative assumes that no changes to the site occur. The existing structures would remain, and their current condition would be unchanged. As the buildings could be fully occupied, analysis of this alternative will also include an assessment of the impact of the site fully occupied, but otherwise unchanged. This alternative considers impacts associated with the existing 287,701 sq. ft.<sup>62</sup> of office space; 57,316 sq. ft. of commercial retail space; a 39,695 sq. ft. (1,751 seats) movie theater; a 108,786 sq. ft. (2,250 seats) live theater; 144,390 sq. ft. of restaurant areas; paved plaza; and subterranean parking structure. Total floor space within the area to be redeveloped would be 678,822 sq. ft. The site as a whole, including the Century Plaza Towers would contain a total floor area of 3,067,338 sq. ft. on a site totaling 610,834 sq. ft. (14.023 acres). This results in an FAR of 5:1. This alternative satisfies a direct requirement in CEQA for a No Project Alternative comparison.

**Table VI-3**  
**Alternative 1 – No Project**

<b>Land Use</b>	<b>Floor Area (sq. ft.)</b>
Office	287,701
Retail	57,316
Live Theater	108,786
Movie Theater	39,695
Health Club	40,934
Restaurant	144,390
<b>Total</b>	<b>678,822</b>

#### a. Aesthetics

##### 1. Visual Qualities

**Aesthetic Character.** Without re-development, the proposed site would remain in the current condition. The Project site currently contains a commercial complex consisting of two stone-covered rectangular eight-story buildings of modern design, with footprints measuring approximately 200 by 250 feet. The site also contains a diamond-shaped open-air plaza, the longer axis of which extends nearly 550 feet from end to end and the shorter axis approximately 250 feet. Mature ornamental trees and landscaping border the Project site, particularly along the southern perimeter.

The two eight-story buildings at 2020 and 2040 Avenue of the Stars were built in the early 1970's and are constructed of a tan colored travertine skin over a steel frame. While not visually distinctive, these structures are visually consistent with and in character with the surrounding area.

The plaza, located at the center of the property, consists of paved areas interspersed with benches, small trees in planters, and small built-in tree and flower gardens. The Project site gently slopes to the east, such that the plaza level is below grade at Avenue of the Stars and at grade on Century Park East. The plaza is pedestrian accessible from the pedestrian corridor below Avenue of the Stars connecting the site to the Century Plaza Hotel, and at street level from Avenue of the Stars and Century Park East. Currently the plaza is not easily accessible from either Olympic or Constellation Boulevards. While not visually distinctive, the plaza is aesthetically consistent with the surrounding area.

<sup>62</sup> All building areas are expressed in Floor Area as defined by the Century City North Specific Plan, unless otherwise noted.



The mature ornamental landscaping and trees, particularly those along Olympic Boulevard, serve to partially block views of the site from the south and contribute to the aesthetic character of the site.

The No Project Alternative ultimately would have a less beneficial impact than the proposed Project. With the proposed Project, a more modern, visually distinctive building and a largely landscaped plaza area would replace the existing structures and paved plaza. Development of the proposed Project would result in the loss of the mature trees along the southern perimeter of the site and would result in a potentially significant impact on the site. However, the proposed Project building and landscaping would enhance the aesthetic quality of the site. Overall, the No Project Alternative would have a lesser impact.

**Alteration of Views.** The No Project Alternative would not result in any change of views over current conditions. The Project visual analysis, included in Section V.A, indicates that because of the increased height of the proposed building compared to the existing structures, a few locations would gain views of the new structure that currently do not have views of the existing buildings. However, due to the concentration of off-site view-blocking structures, increased visibility is predominantly limited to street corridors that are variously oriented and "channel" views toward the Project. Views of the proposed building may be intermittently available from elevated windows through visual gaps between the taller buildings that surround the site. While both the proposed Project impact and the No Project Alternative impact would be less than significant, overall the impact of the proposed Project would be worse.

## **2. Lighting**

In the No Project Alternative, lighting conditions would remain unchanged over existing conditions. Existing on-site sources of night lighting are the spill over of interior lighting from the Century Plaza Towers, security lighting in the plaza and the exterior signage and front entrances to the Shubert Theater and multi-screen movie theaters. The existing theater signage, which fronts onto Avenue of the Stars, is large, bright and multi-colored. Vehicle lights exiting the parking structure sweep out onto adjacent sidewalks and streets. Landscaping, particularly along the northern and southern sides of Olympic Boulevard helps to shield the residential units to the south from direct illumination.

In the long run, illumination impacts from the No Project Alternative, would be reasonably comparable to the mitigated impacts from the proposed Project. Both the proposed Project impact and the No Project Alternative impact would be less than significant.

## **3. Shading**

The No Project Alternative would maintain the existing eight-story buildings on-site. These structures cast shadows, but these shadows are not long enough to reach any residential uses. Shadows cross Avenue of the Stars and partially reach the Century Club to the north, and into the street to the west. The shadows of the other commercial structures in the area reach sidewalks, streets and other commercial buildings. The proposed Project would cast longer shadows into the commercial areas of Century City. Neither project would cast shadows into residential areas nor result in significant shadow impacts.

### **b. Air Quality**

#### **1. Pollutant Emissions**

Traffic generated by existing uses generates pollutant emissions. Gas and electricity usage also generates pollutants in the region. Operational emissions generated by the No Project Alternative would be higher than those of the proposed Project, but would still remain less than significant. There would be no construction emissions from the No Project Alternative. During construction, the proposed Project would result in a net reduction, (as compared to existing generation), in emissions for all pollutants with the exception of PM<sub>10</sub>. This alternative would eliminate a less than significant

impact to PM<sub>10</sub> emissions resulting from construction of the proposed Project, but would result in greater emissions for all other pollutants during both the construction and operational phases.

## **2. Wind**

The No Project Alternative would maintain the existing condition. The plaza area in this alternative is generally considered comfortable for walking. The northern portion of the plaza is characterized as comfortable for standing, with the area nearest to Constellation Boulevard comfortable for walking. Areas in the corridor between and around the existing buildings are considered comfortable for standing.

The prevailing southwesterly winds are intercepted by the Century Plaza Towers and deflected down to the grade level, resulting in wind flow acceleration at the corners of the Towers and in the area between the Century Plaza Towers. Several locations around the Towers were found to have uncomfortable and/or unsafe wind conditions. These unfavorable wind conditions are caused by the existing Towers.

Overall, both the No Project Alternative and the proposed Project would likely result in wind speeds that would be considered comfortable during summer and winter seasons at most locations. While neither scenario would result in significant wind impacts, the proposed Project would result in improved wind conditions between the Century Plaza Towers, the southeastern portion of the lawn, and at the entrance to the proposed building.

### **c. Biological Resources**

The Project site does not contain any of the following biological resources:

- individuals, or habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- individuals or existing habitat of a locally designated species or a locally designated natural habitat or plant community;
- wildlife movement/migration corridor; or
- wetland habitat.

While the No Project Alternative would maintain all onsite landscaping, the proposed Project would increase landscaping on-site. However, with the removal of the mature trees, the proposed Project has a potentially significant impact. Therefore, the alternative would result in reduced biological impacts.

### **d. Geology**

As discussed in Section V.E, the Project site's risk of surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence is low. However, all of Century City is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the No Project Alternative is the same as with the proposed Project. The No Project Alternative would have a lower on-site population during the day and a greater on-site population in the evenings and on weekends. Therefore, the number of people that would be affected in a seismic event is largely the same. However, while the existing buildings meet seismic standards in effect at the time they were constructed they do not meet current seismic standard.

### **e. Hazards and Hazardous Materials**

Potential impacts with regard to methane, oil, asbestos, lead-based paint and other hazardous materials were evaluated. The existing condition of the site has generally, insignificant levels of methane with elevated levels of methane in some areas of the bottom floor (Level F) of the subterranean parking garage. Additionally, elevated levels of methane were found in soil in gas studies conducted below the

slab of Level F. The proposed Project would mitigate impacts associated with methane in and below the parking garage to a less than significant level. The potential impacts with regard to asbestos containing materials (ACMs) are a concern due to demolition and construction of the proposed Project. However, as a result of the on-going asbestos abatement program for the site, removal of ACMs in accordance with legal procedures would not generate a significant impact, and could alleviate the potential for future impacts in the event of a disaster. While both the proposed Project impact and the No Project Alternative impact would ultimately not result in a significant impacts, overall the impact of the proposed Project would be better.

**f. Hydrology**

The hydrology and water quality impacts from the subject property were analyzed by KPFF, Consulting Engineers. Runoff from the site is conveyed and adequately handled by the City's storm drain system. The proposed Project would not alter the subterranean parking garage or significantly alter the existing drainage patterns. Therefore, the No Project Alternative would have similar less than significant impacts to the proposed Project, related to drainage. There is an existing NPDES permit for discharge of water from the subterranean parking garage into the City's storm drain system. The proposed Project would conform to the requirements of the existing NPDES permit, and or a new NPDES permit for the site in addition to a stormwater plan related to construction impacts on water quality and runoff. Therefore, the No Project Alternative would have similar less than significant impacts, after mitigation as the proposed Project.

**g. Land Use**

Existing land uses are compatible with surrounding land use patterns. Additionally, there are no identified conflicts with adjacent uses. The No Project Alternative would be as compatible, and would not have an improved impact over the proposed Project in terms of compatibility with adjacent land uses.

Existing uses are consistent with zoning and planning designations and policies for the site. However, the facilities on-site are underutilized in their current condition. The site would benefit from the revitalizing effect of the proposed Project. This would aid in fostering the goals of the policies of the related City plans. Overall, in the area of policy compliance, both the proposed Project and the No Project Alternative would be consistent with the policies of the related City plans and would have a similar less than significant impact.

**h. Noise**

Noise from the operation of existing uses is generated primarily by traffic coming to and from the Project site. Existing uses generate more traffic, and more noise than the proposed Project. With the alternative, construction impacts of the proposed Project would not occur. The No Project Alternative impacts would be less than significant and would eliminate the proposed Project's significant construction noise impact. However, in the long run noise impacts resulting from the operation of the proposed Project would be reduced.

**i. Population and Housing**

The No Project Alternative, like the proposed Project, would not generate any residential units. The proposed Project would generate more employment opportunities than the No Project Alternative. Although both the proposed Project and the No Project Alternative would have a less than significant impact, given the saturated job market in the West Los Angeles area, the No Project Alternative would result in less of an impact on population and housing.

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**j. Public Services****1. Fire Protection**

The No Project Alternative would not result in an increase in fire protection demands and, therefore, would create no impact. This represents a reduction of the proposed Project's less than significant impact in the area of fire protection.

**2. Police Protection**

The No Project Alternative would not result in an increase in police protection demands. This represents a reduction of the proposed Project's less than significant impact after mitigation in the area of police protection.

**3. Schools**

Public school demand is based upon population. Currently the existing site does not contain any residential units. Therefore, demand for public school facilities and services from a commercial development would depend upon the employment level on-site and the possibility of employees enrolling their children in schools within the service area. The proposed Project's office space would contribute to a higher employment level on the site, which could create some additional demand for public school services. While neither scenario would result in a significant impact, the No Project Alternative, would have a reduced, less than significant impact on school facilities than the proposed Project.

**4. Libraries**

Library demand is based upon population. Currently, the existing site does not contain any residential units. Therefore, demand for library facilities and services is dependent upon the employment level on-site. The proposed Project's office space would contribute to the daytime employment level in the area, which could create some additional demand for local library services. While neither scenario would result in a significant impact, the No Project Alternative, would have a reduced, less than significant impact on library facilities than the proposed Project.

**k. Recreation and Parks**

Public recreation demand is based upon population. The No Project Alternative would retain the eight rooftop tennis courts, as well as the passive recreation opportunities provided by the Shubert Theater and movie theaters. Overall, this alternative represents a reduction over the proposed Project's impact, which is less than significant.

**l. Transportation/Traffic**

The No Project Alternative would generate 19,161 trips per day assuming all existing site structures were fully occupied (CCNSP Daily Trips). This is in excess of the proposed Project trip generation of 12,450 trips per day. Peak hour traffic would also be increased over that of the proposed Project. Morning peak hour trips would be 1,123 trips for the No Project Alternative as opposed to 1,043 trips with the proposed Project (Revised LADOT Methodology). Similarly, evening peak hour trips would be 2,060 trips for the No Project Alternative as opposed to 1,161 trips with the proposed Project. Therefore, the No Project Alternative impacts would be greater than the proposed Project's impacts.

**m. Utilities and Service Systems****1. Wastewater**

The No Project Alternative would generate 18,711 gallons per day less wastewater than the proposed Project (see **Table VI-3**). Area sewer and treatment plant infrastructure would be more affected by the proposed Project. The No Project Alternative would have less of an impact than the proposed Project.

## **2. Stormwater**

Since the majority of the site is currently covered with impermeable surfaces, development of the proposed Project will not result in additional quantities of runoff. The proposed Project would include the conversion of part of the hardscape plaza into a lawn, which would provide additional permeable surface to reduce the amount of runoff. However, the subterranean parking structure underlies virtually the entire site, limiting the percolation capacity of the ground.

The proposed Project would not generate stormwater run-off in excess of the No Project Alternative. There is no significant net change in permeable surface area between the No Project Alternative and the proposed Project. Therefore, the No Project Alternative would have the same less than significant impact on stormwater facilities after mitigation as the proposed Project.

## **3. Water Supply**

The No Project Alternative's water consumption would be 18,711 gallons per day less than the proposed Project (see **Table VI-3**). Area water infrastructure and supplies would be more affected by the proposed Project. The No Project Alternative would have less of an impact than the proposed Project.

## **4. Solid Waste**

The No Project Alternative would generate 18,820 pounds per week of solid waste, which would generate less of an impact on landfills than the 23,663 pounds per week generated by the proposed Project (see **Table VI-3**). Therefore the No Project Alternative would have less of an impact than the proposed Project.

## **5. Electricity**

The No Project Alternative would generate a total demand load of 11,132,680 kWh (see **Table VI-3**). The Alternative would demand 3,220,728 kWh more than the proposed Project. While the Department of Water and Power currently has adequate resources to serve the No Project Alternative, the alternative would create a greater impact than the proposed Project.

**TABLE VI-3**  
**[Insert Excel Table VI-3 - Alternatives Utility Usage]**

**D. ANALYSIS OF ALTERNATIVE 2: ALL OFFICE DEVELOPMENT**

Alternative 2 includes the demolition of the two eight-story buildings at 2020 and 2040 Avenue of the Stars, replaced by a single 39-story building located on the southeast corner of Avenue of the Stars and Constellation Boulevard. The proposed alternative would provide 1,276,488 sq. ft. of class "A" office space, eight levels of parking, and a landscaped plaza. Like the proposed Project this alternative would provide a pedestrian corridor under Avenue of the Stars.

The All Office Alternative is based on the permitted uses, height, development criteria and building intensity provisions of the Specific Plan. The Specific Plan permits office development, provided that the density shall be limited to a floor area ratio of 6:1. Based upon a total site area of 610,834 sq. ft., the total development permitted is 3,665,004 sq. ft. The Century Plaza Towers, which would remain unchanged, provide 2,388,516 sq. ft. The remaining 1,276,488 sq. ft would be allocated to the proposed office building.

**Alternative 2 – All Office**

Land Use	Floor Area (sq. ft.)
Office	1,276,488
<b>Total</b>	<b>1,276,488</b>

As compared to the proposed Project (Tables VI-1, VI-2), Alternative 2 would provide 497,541 sq. ft., more floor area.

**a. Aesthetics****1. Visual Qualities**

The architectural style and character of this alternative would be roughly equivalent to that of the proposed Project. However, the building form and height would change, to provide for the significantly taller structure. As with the proposed Project, the plaza areas and the perimeter of the subject property would be landscaped.

The All Office Alternative ultimately would have a less beneficial impact than the proposed Project. Like the proposed Project, a more modern visually distinctive building and a largely landscaped plaza area would replace the existing structures and paved plaza. While this alternative would not incorporate the distinctive opening in the center of the building, the new building would be in character with the high-rise office buildings in Century City, including the SunAmerica building, the under construction Constellation Place building, Watt Towers, and Century Plaza Towers. Development of this alternative would also result in the loss of the mature trees along the southern perimeter of the site and would result in a potentially significant impact on the site. This Alternative would be in character with the aesthetic quality of the site, and would not result in a significant impact after mitigation. While both the proposed Project impact and the alternative impact would be less than significant after mitigation, overall the impact of the All Office Alternative would be greater.

**Alteration of Views.** Due to the increase height of the proposed building in the All Office Alternative, the alternative would result in a change of views over the proposed Project conditions. The alternative would construct an office building 24 stories taller than the proposed Project. The project site is bound on the east, north, and west by commercial buildings of 44, 22, 39, 19, 38, and 30 stories. This concentration of off-site view-blocking structures, would limit visibility predominantly to street corridors that are variously oriented and "channeled" toward the site. Nevertheless, because of the increased height of the alternative building compared to the proposed Project, some locations

would gain views of the alternative office building that would not have views of the proposed Project.

The completion of this alternative would contribute to the density of buildings visible in the Century City skyline when viewed from foreground to middle-distant viewing locations from the east, north, and south, and from distant viewing locations from the south. The office tower would be of a height and bulk consistent with such views, and constructed of materials appropriate for the modern urban landscape of Century City. While both the proposed Project impact and the All Office Alternative impact would be less than significant after mitigation, overall the impact of the alternative would be greater.

### **2. Lighting**

Alternative 2 has similar uses as the proposed Project, except that it would be roughly two-thirds larger than the proposed Project. Additional lighting over the proposed Project levels might be required for signage, entryways, office windows and walkways. It is assumed that the alternative would implement design and mitigation measures similar to the proposed Project, including restrictions on types of signage, and timers. Overall, lighting would be expected to increase with the alternative, but still fall within the proposed Project's less than significant impact after mitigation category.

### **3. Shading**

The structure in Alternative 2, being substantially taller than the proposed Project, would cast longer shadows into the commercial areas of Century City. While, neither project would cast shadows into residential areas nor result in significant shadow impacts, the longer shadows of the alternative would be greater.

## **b. Air Quality**

### **1. Pollutant Emissions**

Construction requirements for the alternative would be similar to those of the proposed Project, although because it proposes two-thirds more floor area of development, the construction period would be either: longer than that of the proposed Project, extending for more days; or more intense with a greater number of crews working. Because of the size of the development, it is likely the alternative's air quality impacts from construction would be significant.

As this alternative would generate more traffic than the proposed Project, air quality impacts during operations would be greater than with the proposed Project. An analysis of the Alternatives (Appendix 16) indicates that the alternative would generate fewer daily trips than the existing uses. Therefore, operational air quality emissions would be less than significant.

### **2. Wind**

The prevailing southwesterly winds are intercepted by the Century Plaza Towers and deflected down to the grade level, resulting in wind flow acceleration at the corners of the Towers and in the area between the Century Plaza Towers. Since the alternative would locate a large building to the southwest of the Century Plaza Towers, the unfavorable wind condition that exists at the corners off the Towers could be reduced. However, the potential exists that the new structure could result in unfavorable wind conditions at the base of the new building. Without a detailed wind study<sup>63</sup> for the All Office Alternative, the exact impact is unknown. This EIR will take the conservative view and

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<sup>63</sup> CEQA does not require that alternative impacts be evaluated to the same level of detail as Project impacts, the main purpose is to be able to determine if impacts would be greater or reduced than with the Project.



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assume that the alternative's wind impacts are neither better nor worse than the proposed Project's impacts.

**c. Biological Resources**

No sensitive biological resources are known to exist on the Project site. However, the loss of mature trees, as with the proposed Project is potentially significant. The impacts after mitigation are less than significant and similar to the proposed Project.

**d. Geology**

As discussed in Section V.E, the Project site's risk from surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence is low. However, all of Century City is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the All Office Alternative is the same as with the proposed Project. The alternative would have a greater on-site population during the day. Therefore, the number of people that would be affected in a seismic event would be greater than the proposed Project.

**e. Hazards and Hazardous Materials**

The existing condition of the site has generally insignificant levels of methane with elevated levels of methane in some areas of the bottom floor (Level F) of the subterranean parking garage. Additionally, elevated levels of methane were found in soil in gas studies conducted below the slab of Level F. Like the proposed Project, it is assumed that the alternative would mitigate impacts associated with methane in and below the parking garage to less than significant levels. The potential impacts with regard to asbestos containing materials (ACMs) are a concern due to demolition and construction of the proposed Project. It is assumed that the alternative would incorporate mitigation measures designed to reduce impacts to less than significant levels. Overall, both scenarios would result in less than significant impacts after mitigation.

**f. Hydrology**

The hydrology and water quality impacts from the subject property were analyzed by KPFF, Consulting Engineers. Runoff from the site is conveyed and adequately handled by the City's storm drain system. The alternative would not alter the subterranean parking garage or significantly alter the existing drainage patterns. Therefore, the alternative would have similar less than significant impacts to the proposed Project, related to drainage. The alternative would conform to the requirements of the existing NPDES permit, and/or a new NPDES permit for the site in addition to a stormwater plan related to construction impacts on water quality and runoff would be implemented. Therefore, the All Office Alternative would have similar less than significant impacts after mitigation to the proposed Project.

**g. Land Use**

Alternative 2 would have similar less than significant impacts with regard to land use compatibility as the proposed Project. The All Office Alternative is based on the permitted uses, height, development criteria and building intensity provisions of the Specific Plan. The Specific Plan permits office development, provided that the density shall be limited to a floor area ratio of 6:1. Based upon a total site area of 610,834 sq. ft., the total development permitted is 3,665,004 sq. ft. The Century Plaza Towers, which would remain unchanged, provide 2,388,516 sq. ft. The remaining 1,276,488 sq. ft would be allocated to the proposed office building. The alternative is consistent with all applicable city plans and no significant impacts would be anticipated.

**h. Noise**

Construction requirements for this alternative would be similar to those of the proposed Project, although because it has a greater floor area of development, construction would be extended over a

longer calendar period. Noise impacts during construction would likely be similar on a day to day basis to those of the proposed Project, and the impact would be potentially significant after mitigation. However, impacts would be slightly higher overall, due to the extended duration of construction.

An analysis of the traffic generation of the alternatives (Appendix 16) indicates that the alternative would generate fewer daily and peak hour trips than the existing uses. Therefore, noise impacts would be less than significant. However, as this alternative would generate more traffic than the proposed Project, noise impacts during operations would be greater than with the proposed Project.

**i. Population And Housing**

The All Office Alternative, like the proposed Project, would not generate any residential units. The alternative would generate more employment opportunities than the proposed Project. Neither the proposed Project nor the alternative would eliminate or add housing units; both would have a less than significant impact on population and housing.

**j. Public Services**

**1. Fire Protection**

Alternative 2 would require similar fire protection services as the proposed Project. Although the alternative has two-thirds more floor area than the proposed Project and the tower element would present added impacts for fire service in the event of a fire, the alternative would be subject to code compliance. Therefore, the structure would be considered adequate for fire service. The alternative would have a similar (albeit greater) less than significant impact as the proposed Project.

**2. Police Protection**

Alternative 2 would require similar police protection services as the proposed Project. Although, the alternative has two-thirds more floor area than the proposed Project, the alternative would be subject to code compliance and would incorporate private security, and appropriate design and mitigation measures. Therefore, the structure would be considered adequate for police service. The alternative would have a similar (albeit greater) less than significant impact after mitigation as the proposed Project.

**3. Schools**

Public school demand is based upon population. Neither the alternative nor the proposed Project provides any residential units. Therefore, demand for public school facilities and services from the development would depend upon the employment level on-site and the possibility of employees enrolling their children in schools within the service area. The alternative would provide more office space than the proposed Project and would contribute to a higher employment level on the site, which could create some additional demand for public school services. Enrollment of children of "out of service area" commercial employees in local schools requires a permit. LAUSD can decline such permits if adequate capacity is not available. Therefore, the alternative's impact is less than significant.

**4. Libraries**

Library demand is also based upon population. Neither the alternative nor the proposed Project provides any residential units. Therefore, demand for library facilities and services would be dependent upon the employment level on-site. The alternative would contribute to the daytime employment level in the area, which could create some additional demand for local library services. While neither scenario would result in a significant impact, the All Office Alternative, would have a greater, less than significant impact on library facilities than the proposed Project.

**k. Recreation and Parks**

Public recreation demand is based upon population. Neither Alternative 2 nor the proposed Project provides any residential units. Therefore, demand for public recreation facilities resulting from the development would depend upon the employment level on-site. The alternative would provide more office space than the proposed Project and would contribute to a higher employment level on the site, which could create some additional demand for recreational opportunities, including running areas, softball/soccer fields, basketball/tennis courts and swimming pools. The increased demand for public recreation facilities is not likely to substantially deteriorate existing facilities or require the construction of new facilities. The alternative would also be required to pay impact fees, if necessary, to offset any potentially significant impacts.

**l. Transportation/Traffic**

The All Office Alternative would result in increased peak hour traffic when compared to the proposed Project. Morning peak hour trips would be 1,490 trips for the alternative as opposed to 1,043 trips with the proposed Project (Revised LADOT methodology). Similarly, evening peak hour trips would be 1,463 trips for the alternative as opposed to 1,161 trips with the proposed Project. The alternative would result in greater traffic levels than the proposed Project.

**m. Utilities And Service Systems****1. Wastewater**

Alternative 2 would generate 92,881 gallons per day more wastewater than the proposed Project (see Table VI-3). The alternative would also result in a greater impact to area sewer and treatment plant infrastructure. Therefore, Alternative 2 would have a greater impact on wastewater systems than the proposed Project. Overall, the impact on the wastewater system would be less than significant, although mitigation may be required to limit peak flow.

**2. Stormwater**

Alternative 2 would not generate stormwater run-off in excess of the proposed Project. There is no significant net change in permeable surface area between Alternative 2 and the proposed Project. Therefore, this alternative would have the same less than significant impact after mitigation on stormwater facilities as the proposed Project.

**3. Water Supply**

The Alternative's water consumption would be 92,881 gallons per day more than the proposed Project's (see Table VI-3). Impacts to area water infrastructure and supplies would be greater than with the proposed Project. Therefore, Alternative 2 would have a greater impact on water supply than the proposed Project.

**4. Solid Waste**

Alternative 2 would generate 14,631 pounds per week more solid waste than the proposed Project (see Table VI-3). Landfills would be more affected by the alternative. This alternative will have a greater impact than the proposed Project.

**5. Electricity**

Alternative 2 would generate a total demand load of 8,282,208 kWh (see Table VI-3). The Alternative would demand 370,256 kWh more than the proposed Project. While the Department of Water and Power currently has adequate resources to serve Alternative 2, the Alternative would create a greater impact than the proposed Project.

### E. ANALYSIS OF ALTERNATIVE 3: MIXED-USE HOTEL, RETAIL AND ENTERTAINMENT DEVELOPMENT

Alternative 3 includes the demolition of the two eight-story buildings at 2020 and 2040 Avenue of the Stars, replaced by a single 20-story building located along Avenue of the Stars. The alternative proposes an entertainment oriented destination shopping and tourist experience. By providing anchor retail stores and themed restaurants, it is planned that the design and atmosphere of the site would attract consumers. Examples of entertainment retail sites include Universal Citywalk and the Forum Shops at Caesars Palace in Las Vegas. The alternative consists of a 750-room hotel within a 618,750 sq. ft. building (including 26,000 sq. ft. banquet facilities); 154,000 sq. ft. of retail space; 65,900 sq. ft. of entertainment retail 88,100 sq. ft. of entertainment restaurant space; pedestrian corridor, and a plaza. Additionally, as the uses would require substantially more parking than the proposed Project, some parking facilities would be located above grade and likely visible from Avenue of the Stars and Constellation Boulevard. It is assumed that these levels would be shielded by landscaping or other design element. This proposal currently would be allowed under the Century City North Specific Plan and would require no amendments.

Alternative 3 is based on the permitted uses, height, development criteria and building intensity provisions of the Specific Plan. The Specific Plan permits office development, provided that the density shall be limited to a floor area ratio of 6:1. Based upon a total site area of 610,834 sq. ft., the total development permitted is 3,665,004 sq. ft. The Century Plaza Towers, which would remain unchanged, and provide 2,388,516 sq. ft. The FAR would be 5.4:1 based upon a total of 926,750 sq. ft. of new development and the Century Plaza Towers.

#### Alternative 3 – Mixed Use: Hotel, Retail and Entertainment

Land Use	Rooms	Floor Area (sq. ft.)
Hotel	750 rooms	618,750
Retail		154,000
Entertainment Retail		65,900
Entertainment Restaurant (Low-Turnover)		44,050
Entertainment Restaurant (High-Turnover)		44,050
<b>Total</b>		<b>926,750</b>

As compared to the proposed Project (Tables VI-1, VI-2), Alternative 3 would provide 147,803 sq. ft., more floor area and 750 more hotel rooms (the proposed Project includes none).

#### a. Aesthetics

##### 1. Visual Qualities

**Aesthetic Character.** The aesthetic character of this alternative would differ from the proposed Project, but not necessarily from the surrounding vicinity. Given the retail, restaurant and hotel uses, the activities on-site would be more entertainment oriented. The design would reflect these uses. The alternative would likely include more pedestrian activity and more short-visit activity, requiring more signage and walkways than the proposed Project. Like the proposed Project, this alternative would likely require some mitigation, or more detailed design scrutiny, as it is anticipated to have more design issues (such as signage and landscaping). The plaza would be smaller, and provide less landscaping than the proposed Project. Additionally, as the uses would require substantially more parking than the proposed Project and additional subterranean spaces could not be added below existing subterranean, some parking facilities would be located above grade and would likely be visible from Avenue of the Stars and Constellation Boulevard. It is assumed that these levels would

be shielded by landscaping or other design element. For these reasons, design issues could result in an increased impact over the proposed Project's less than significant impact after mitigation. It is expected that the impacts of Alternative 3 could be mitigated to a less than significant level.

**Alteration of Views.** The completion of the proposed Project would contribute to the density of buildings visible in the Century City skyline when viewed from foreground to middle-distant viewing locations. The hotel would be approximately five stories taller than the proposed Project but of a height and bulk consistent with views in the area, and constructed of materials appropriate for the modern urban landscape of Century City. While both the proposed Project impact and the Hotel Alternative impact would be less than significant after mitigation, overall the impact of the alternative would be greater.

## **2. Lighting**

Alternative 3 includes more entertainment uses and a hotel, which would result in an increase in short-term visits to the site and nighttime activity. As such, nighttime lighting could be more of an issue, although any project on the site would require some nighttime lighting of public and other outdoor spaces. This alternative would likely include more lit signage and walkway/public space illumination related to the entertainment uses and hotel entrances. Mitigation measures would likely be required in order to assure lighting from signage, entryways and commercial uses are reduced. Alternative 3 would have increased impacts over the proposed Project, but these could be rendered less than significant after mitigation.

## **3. Shading**

Generally, the hotel building is of a height and bulk similar to the proposed Project, however, the structure in Alternative 3 is five stories taller, and would cast longer shadows into the commercial areas of Century City. While, neither project would cast shadows into residential areas nor result in significant shadow impacts the longer shadows of the alternative would be greater.

### **b. Air Quality**

#### **1. Pollutant Emissions**

Construction requirements for the alternative would be similar to those of the proposed Project, although because it proposes a 147,803 sq. ft. greater floor area of development, the construction period would be either: longer than that of the proposed Project, extending for more days; or more intense with a greater number of crews working. This EIR will take the conservative view and assume that the alternative's construction schedule and crew deployment would be designed to keep emissions within SCAQMD thresholds. However, in either instance, the alternative's air quality impacts would be greater than the proposed Project's impacts.

As this alternative would generate more traffic than the proposed Project, air quality impacts during operations would be greater than with the proposed Project. A traffic analysis of the Alternatives (Appendix 16) indicates that this alternative would generate the same number of daily trips as the existing uses. Therefore, operational air quality emissions would be less than significant.

#### **2. Wind**

The prevailing southwesterly winds are intercepted by the Century Plaza Towers and deflected down to the grade level, resulting in wind flow acceleration at the corners of the Towers and in the area between the Century Plaza Towers. Several locations around the Towers were found to have uncomfortable and/or unsafe wind conditions. These unfavorable wind conditions are caused by the existing Towers. The proposed redevelopment has a building mass similar to that of the existing building on the site, and is not expected to negatively affect the wind environment in the area.

However, without a detailed wind study<sup>64</sup> for the Hotel Alternative, the exact impact is unknown. This EIR will take the conservative view and assume that the alternative's wind impacts are neither better nor worse than the proposed Project's impacts.

**c. Biological Resources**

No sensitive biological resources are known to exist on the Project site. However, the loss of mature trees, as with the proposed Project is potentially significant. The impacts after mitigation are less than significant and similar to the proposed Project.

**d. Geology**

As discussed in Section V.E, the Project site's risk from surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence is low. However, all of Century City is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the alternative is the same as with the proposed Project. The alternative may have a greater on-site population in the evenings and overnight, while the proposed Project may have a greater on-site population during business hours. Therefore, the number of people that may be affected in a seismic event would be similar to the proposed Project.

**e. Hazards and Hazardous Materials**

The existing condition of the site has generally insignificant levels of methane with elevated levels of methane in some areas of the bottom floor (Level F) of the subterranean parking garage. Additionally, elevated levels of methane were found in soil in gas studies conducted below the slab of Level F. Like the proposed Project, it is assumed that the alternative would mitigate impacts associated with methane in and below the parking garage to less than significant levels. The potential impacts with regard to asbestos containing materials (ACMs) are a concern due to demolition and construction of the proposed Project. The alternative would incorporate mitigation measures designed to reduce impacts to less than significant levels. Overall, both scenarios would result in similar less than significant impacts after mitigation.

**f. Hydrology**

Runoff from the site is conveyed and adequately handled by the City's storm drain system. The alternative would not alter the subterranean parking garage or significantly alter the existing drainage patterns. Therefore, the alternative would have similar less than significant impacts to the proposed Project, related to drainage. The alternative would conform to the requirements of the existing NPDES permit, and/or a new NPDES permit for the site in addition to a stormwater plan related to construction impacts on water quality and runoff would be implemented. Therefore, the Hotel Alternative would have similar less than significant impacts after mitigation to the proposed Project.

**g. Land Use**

Alternative 3 would have similar less than significant impacts with regard to land use compatibility as the proposed Project. The Hotel Alternative is based on the permitted uses, development criteria and building intensity provisions of the Specific Plan. The Specific Plan permits mixed use commercial development, provided that the density shall be limited to a floor area ratio of 6:1. Based upon a total site area of 610,834 sq. ft., the total development permitted is 3,665,004 sq. ft. The Century Plaza Towers, which would remain unchanged, provide 2,388,516 sq. ft. The alternative would develop 926,750 sq. ft. resulting in a total on-site of 3,315,266 sq. ft. and FAR of 5.4:1. The alternative is consistent with all applicable city plans and land use impacts would be less than significant.

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<sup>64</sup> CEQA does not require that alternative impacts be evaluated to the same level of detail as Project impacts, the main purpose is to be able to determine if impacts would be greater or reduced than with the Project.

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**h. Noise**

Construction requirements for this alternative would be similar to those of the proposed Project, although because it has a greater floor area of development, construction would be extended over a longer calendar period. Noise impacts during construction would likely be similar on a day to day basis to those of the proposed Project, and the impact would be potentially significant after mitigation. However, impacts would be slightly higher overall, due to the extended duration of construction.

A traffic analysis of the Alternatives (Appendix 16) indicates that this alternative would generate the same number of daily trips as the existing uses. Therefore, noise would be less than significant. As this alternative would generate more traffic than the proposed Project, noise impacts during operations would be greater than with the proposed Project.

**i. Population And Housing**

The Hotel Alternative, like the proposed Project, would not generate any residential units. The alternative would generate more employment opportunities than the proposed Project. Neither the proposed Project nor the alternative would eliminate or add housing units; both would have a less than significant impact on population and housing.

**j. Public Services****1. Fire Protection**

Alternative 3 would require similar fire protection services as the proposed Project. Although, the alternative has 147,803 sq. ft. more floor area than the proposed Project and the hotel element due to greater overnight occupancy would present added impacts for fire service in the event of a fire, the alternative would be subject to code compliance and fire department review. The hotel and entertainment complex would be required to meet standards for sprinklers, on-site water tank storage, evacuation, fire flows, hydrant location, access, and others as determined by the Fire Department. Therefore, the structure would be considered adequate for fire service after mitigation. The alternative would have a similar (albeit greater) less than significant impact as the proposed Project.

**2. Police Protection**

Alternative 3 includes more entertainment uses and a hotel, which would result in an increase in short-term visits to the site and nighttime activity. As such, police protection services could be more of an issue. The alternative would likely include more pedestrian activity. The alternative would likely require some mitigation, or more detailed design scrutiny, as it is anticipated to have more design issues (such as access and security). For these reasons, design issues could result in an increased impact over the proposed Project's less than significant impact after mitigation. It is expected that the impacts of Alternative 3 would be less than significant after mitigation.

**3. Schools**

Public school demand is based upon population. Neither the alternative nor the proposed Project provides any residential units. Therefore, demand for public school facilities and services from the development would depend upon the employment level on-site and the possibility of employees enrolling their children in schools within the service area. The alternative would provide more development area than the proposed Project and would contribute to a higher employment level on the site, which could create some additional demand for public school services. Enrollment of children of "out of service area" commercial employees in local schools requires a permit. LAUSD can decline such permits if adequate capacity is not available. Therefore, the alternative's impact could be reduced to less than significant levels.

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#### **4. Libraries**

Library demand is also based upon population. Neither the alternative nor the proposed Project provides any residential units. Therefore, demand for library facilities and services would be dependent upon the employment level on-site. The alternative would contribute to the employment level in the area, which could create some additional demand for local library services. While neither scenario would result in a significant impact, the Hotel Alternative, would have a greater, less than significant impact on library facilities than the proposed Project.

#### **k. Recreation and Parks**

Public recreation demand is based upon population. Neither, Alternative 3 nor the proposed Project provides any residential units. Therefore, demand for public recreation facilities resulting from the development would depend upon the employment level on-site. The alternative would provide more entertainment than the proposed Project, providing passive recreational opportunities. The alternative's higher employment level on the site, could create some additional demand for recreational opportunities, including running areas, softball/soccer fields, basketball/tennis courts and swimming pools. The increased demand for public recreation facilities is not likely to substantially deteriorate existing facilities or require the construction of new facilities. The alternative would also be required to pay impact fees, if necessary, to offset any potentially significant impacts.

#### **l. Transportation/Traffic**

The Hotel Alternative would result in increased peak hour traffic levels when compared to the proposed Project. The alternative would generate 1,122 AM peak hour trips compared to 1,043 AM trips generated by the proposed Project (Revised LADOT methodology). The alternative would generate 3,420 PM peak hour trips compared to 1,161 trips generated by the proposed Project. The Hotel Alternative would result in a greater traffic impact than the proposed Project.

#### **m. Utilities And Service Systems**

##### **1. Wastewater**

Alternative 3 would generate 141,284 gallons per day more wastewater than the proposed Project (see Table VI-3). The alternative's impact on wastewater treatment facilities would be greater than the proposed Project. Therefore, Alternative 3 would result in a greater impact to wastewater systems than the proposed Project. Overall, the impact on the wastewater system would be less than significant, although mitigation may be required to limit peak flow.

##### **2. Stormwater**

The amount of permeable surface area between the alternative and the proposed Project would be equivalent. Therefore, Alternative 3 would have the same less than significant impact after mitigation on stormwater facilities as the proposed Project.

##### **3. Water Supply**

The alternative's water consumption would be 141,284 gallons per day more than the proposed Project's (see Table VI-3). Impacts to area water infrastructure and supplies would be greater; however, no major deficiencies are anticipated. Therefore, Alternative 3 would have a greater impact on water supply than the proposed Project.

##### **4. Solid Waste**

Alternative 3 would generate 2,383 pounds per week less solid waste than the proposed Project (see Table VI-3). Landfills would be less affected by the alternative. The alternative's impact would be less than the proposed Project's impact.



**5. Electricity**

Alternative 3 would generate a total demand load of 8,874,875 kWh (see Table VI-3). The Alternative would demand 962,923 kWh more than the proposed Project. While the Department of Water and Power currently has adequate resources to serve Alternative 3, the Alternative would create a greater impact than the proposed Project.

## F. ANALYSIS OF ALTERNATIVE 4: REDUCED DENSITY DEVELOPMENT

Alternative 4 would replace the two eight-story buildings at 2020 and 2040 Avenue of the Stars, with a single seven-story building located along Avenue of the Stars. The proposed alternative would provide 500,000 sq. ft. of class "A" office space, eight levels of parking, and a landscaped plaza.

The Reduced Density Alternative represents roughly a one-third reduction in floor area from the proposed Project. The alternative is based on the permitted uses, height, development criteria and building intensity provisions of the Specific Plan. The Specific Plan permits office development, provided that the density shall be limited to a floor area ratio of 6:1. Based upon a total site area of 610,834 sq. ft., the total development permitted is 3,665,004 sq. ft. The Century Plaza Towers, which would remain unchanged, provide 2,388,516 sq. ft. With this alternative, the FAR would be 4.7:1 based upon a total of 500,000 sq. ft. of new development and the Century Plaza Towers.

### Alternative 4 – Reduced Density

Land Use	Floor Area (sq. ft.)
Office	500,000
<b>Total</b>	<b>500,000</b>

Alternative 4 would provide 278,947 sq. ft. less floor area than the proposed Project and 178,822 less floor area than existing conditions (Tables VI-1 and VI-2).

#### a. Aesthetics

##### 1. Visual Qualities

The architectural style and character of this alternative would be roughly equivalent to that of the proposed Project. However, the building form and height would change, providing a shorter structure. As with the proposed Project, the plaza areas and the perimeter of the subject property would be landscaped.

The Reduced Density Alternative would have a reduced impact when compared to the proposed Project. Like the proposed Project, a more modern visually distinctive building and a landscaped plaza area would replace the existing structures and paved plaza. While this alternative would not incorporate the distinctive opening in the center of the building, the new building would be in character with the high-rise office buildings in Century City, including the SunAmerica building, the under construction Constellation Place building, Watt Towers, and Century Plaza Towers. Development of this alternative would result in the loss of the mature trees along the southern perimeter of the site and would result in a potentially significant impact on the site. This Alternative would be in character with the aesthetic quality of the site and would not result in a significant impact after mitigation. While both the proposed Project impact and the alternative impact would be less than significant after mitigation, overall the impact of the Reduced Density Alternative would be less.

**Alteration of Views.** Due to the decreased height of the proposed building in the Reduced Density Alternative, the alternative would result in a change of views over the proposed Project conditions. The alternative would construct an office building seven stories shorter than the proposed Project and one story shorter than existing conditions. The Project site is bordered on the east, north, and west by commercial buildings of 44, 22, 39, 19, 38, and 30 stories. This concentration of off-site view-blocking structures would limit visibility predominantly to street corridors that are variously oriented and "channeled" toward the site. Because of the reduced height of the alternative building

compared to the proposed Project, some locations that would have views of the proposed Project would not have views of the reduced density office building.

The completion of this alternative would reduce the density of buildings visible in the Century City skyline when viewed from foreground to middle-distant viewing locations from the east, north, and south. It would not be visible from distant viewing locations. The office building would be of a height and bulk consistent with such views, and constructed of materials appropriate for the modern urban landscape of Century City. While both the proposed Project impact and the Reduced Density Alternative impact would be less than significant, overall the impact of the alternative would be less.

## **2. Lighting**

Alternative 4 has similar uses as the proposed Project, except that it would be roughly one-third smaller than the proposed Project. Reduced lighting over the proposed Project levels would be required for signage, entryways, office windows and walkways. It is assumed that the alternative would implement design and mitigation measures similar to the proposed Project, including restrictions on types of signage, and timers. Overall, lighting would be expected to be reduced with the alternative.

## **3. Shading**

The structure in Alternative 4, being shorter than the proposed Project (and existing buildings), would cast shorter shadows into the commercial areas of Century City. While neither project would cast shadows into residential areas nor result in significant shadow impacts, the shorter shadows of the alternative would be less than proposed Project.

### **b. Air Quality**

#### **1. Pollutant Emissions**

Construction requirements for the alternative would be similar to those of the proposed Project; however, because it proposes one-third less floor area of development, the construction period would be either: shorter than that of the proposed Project, or less intense with a fewer number of crews working. In either case, the alternative's construction schedule and crew deployment would be within SCAQMD thresholds and would represent a reduction in construction related pollutant emissions when compared to the proposed Project.

As this alternative would generate less traffic than the proposed Project, air quality impacts during operations would be less than with the proposed Project. An analysis of the Alternatives (Appendix 16) indicates that the alternative would generate fewer daily trips than the existing uses. Therefore, air quality emissions would be less than significant.

#### **2. Wind**

The prevailing southwesterly winds are intercepted by the Century Plaza Towers and deflected down to the grade level, resulting in wind flow acceleration at the corners of the Towers and in the area between the Century Plaza Towers. Several locations around the Towers were found to have uncomfortable and/or unsafe wind conditions. These unfavorable wind conditions are caused by the existing Towers.

Since the alternative would locate a building similar in size to the existing structure, it is likely that wind conditions would remain comparable to existing conditions. However, without a detailed wind study<sup>65</sup> for the Reduced Density Alternative, the exact impact is unknown. This EIR will take the

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<sup>65</sup> CEQA does not require that alternative impacts be evaluated to the same level of detail as Project impacts, the main purpose is to be able to determine if impacts would be greater or reduced than with the Project.

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conservative view and assume that the alternative's wind impacts are neither better nor worse than the proposed Project's impacts.

**c. Biological Resources**

No sensitive biological resources are known to exist on the Project site. However, the loss of mature trees, as with the proposed Project is potentially significant. The impacts after mitigation are less than significant and similar to the proposed Project.

**d. Geology**

As discussed in Section V.E, the Project site's risk from surface rupture, liquefaction, tsunami, seiche, or landslide and subsidence is low. However, all of Century City is subject to seismic groundshaking activity. The potential for a seismic occurrence on the site with the Reduced Density Alternative is the same as with the proposed Project. The alternative would have a reduced on-site population during the day. Therefore, the number of people that would be affected in a seismic event would be less than the proposed Project.

**e. Hazards and Hazardous Materials**

The existing condition of the site has generally insignificant levels of methane with elevated levels of methane in some areas of the bottom floor (Level F) of the subterranean parking garage. Additionally, elevated levels of methane were found in soil in gas studies conducted below the slab of Level F. Like the proposed Project, it is assumed that the alternative would mitigate impacts associated with methane in and below the parking garage to less than significant levels. The potential impacts with regard to asbestos containing materials (ACMs) are a concern due to demolition and construction of the proposed Project. This alternative would incorporate mitigation measures, similar to the Project's that are designed to reduce impacts to less than significant levels. Overall, both scenarios would result in less than significant impacts after mitigation.

**f. Hydrology**

The hydrology and water quality impacts from the subject property were analyzed by KPFF, Consulting Engineers. Runoff from the site is conveyed and adequately handled by the City's storm drain system. The alternative would not alter the subterranean parking garage or significantly alter the existing drainage patterns. Therefore, the alternative would have less than significant impacts related to drainage, similar to the proposed Project. The alternative would conform to the requirements of the existing NPDES permit, and/or a new NPDES permit for the site. Additionally, the Project would implement a stormwater plan related to construction impacts on water quality and runoff. Therefore, the Reduced Density Alternative would have similar less than significant impacts after mitigation.

**g. Land Use**

Alternative 4 would have similar less than significant impacts with regard to land use compatibility as the proposed Project. The Reduced Density Alternative represents roughly a one-third reduction in floor area from the proposed Project. The alternative is based on the permitted uses, height, development criteria and building intensity provisions of the Specific Plan. The Specific Plan permits office development, provided that the density shall be limited to a floor area ratio of 6:1. Based upon a total site area of 610,834 sq. ft., the total development permitted is 3,665,004 sq. ft. The Century Plaza Towers, which would remain unchanged, provide 2,388,516 sq. ft. The FAR would be 4.7:1 based upon a total of 500,000 sq. ft. of new development and the Century Plaza Towers. The alternative is consistent with all applicable City plans and no significant impacts would be anticipated. According to the CCNSP methodology, the alternative would generate approximately 7,000 daily trips, resulting in a surplus of 12,161 trips from the existing conditions.

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**h. Noise**

Construction requirements for this alternative would be similar to those of the proposed Project, however, because it proposes one-third less floor area of development, the construction period would be either: shorter than that of the proposed Project, or less intense with a fewer number of crews working. In either case, noise impacts during construction would likely be similar on a day to day basis to those of the proposed Project, and the impact would be potentially significant after mitigation. However, impacts would be slightly reduced overall, due to the reduced duration or intensity of construction.

An analysis of the operational traffic generation of the alternatives (Appendix 16) indicates that the alternative would generate fewer daily and peak hour trips than the existing uses. This alternative would generate less traffic than the proposed Project, resulting in reduced noise impacts during operations.

**i. Population And Housing**

The Reduced Density Alternative, like the proposed Project, would not generate any residential units. The alternative would generate fewer employment opportunities than the proposed Project. Neither the proposed Project nor the alternative would eliminate or add housing units; both would have a less than significant impact on population and housing.

**j. Public Services****1. Fire Protection**

Alternative 4 would require reduced fire protection services than the proposed Project. The alternative has a quarter less floor area than the existing buildings and one-third less floor area than the proposed Project. It would be subject to fire code compliance. Therefore, the structure would be considered adequate for fire service. The alternative would have a less than significant impact.

**2. Police Protection**

Alternative 4 would require reduced police protection services when compared to the proposed Project. The alternative has a quarter less floor area than the existing buildings and one-third less floor area than the proposed Project. The alternative would be subject to code compliance and would incorporate private security, and appropriate design and mitigation measures. Therefore, the structure would be considered adequate for police service. The alternative would have a less than significant impact after mitigation.

**3. Schools**

Public school demand is based upon population. Neither the alternative nor the proposed Project provides any residential units. Therefore, demand for public school facilities and services from the development would depend upon the employment level on-site and the possibility of employees enrolling their children in schools within the service area. The alternative would provide less office space than the proposed Project and would contribute to a lower employment level on the site, which would result in reduced demand for public school services. Enrollment of children of "out of service area" commercial employees in local schools requires a permit. LAUSD can decline such permits if adequate capacity is not available. Therefore, the alternative's impact is less than significant.

**4. Libraries**

Library demand is also based upon population. Neither the alternative nor the proposed Project provides any residential units. Therefore, demand for library facilities and services would be dependent upon the employment level on-site. The alternative would contribute to the daytime employment level in the area, which could create some additional demand for local library services.

While neither scenario would result in a significant impact, the Reduced Density Alternative would have a reduced, less than significant impact on library facilities compared to the proposed Project.

**k. Recreation and Parks**

Public recreation demand is based upon population. Neither Alternative 4 nor the proposed Project provides any residential units. Therefore, demand for public recreation facilities resulting from the development would depend upon the employment level on-site. The alternative would provide less office space than the proposed Project and would result in a lower employment level on the site. Impacts from the alternative would be slightly less than impacts from the Project, and are not likely to substantially deteriorate existing facilities or require the construction of new facilities.

**l. Transportation/Traffic**

The Reduced Density Alternative would result in reduced peak hour traffic when compared to the proposed Project. Morning peak hour trips would be 705 trips for the alternative as opposed to 1,043 trips with the proposed Project (Revised LADOT methodology). Similarly, evening peak hour trips would be 642 trips for the alternative as opposed to 1,161 trips with the proposed Project. The alternative would result in lower traffic levels than the proposed Project.

**m. Utilities And Service Systems**

**1. Wastewater**

Alternative 4 would generate 8,062 gallons per day less wastewater than the proposed Project (see Table VI-3). The alternative would also result in a reduced impact to area sewer and treatment plant infrastructure. Therefore, Alternative 4 would have less of an impact on wastewater systems than the proposed Project. Overall, the impact on the wastewater system would be less than significant.

**2. Stormwater**

Alternative 4 would not generate stormwater run-off in excess of the proposed Project. There is no significant net change in permeable surface area between Alternative 4 and the proposed Project. Therefore, this alternative would have the same less than significant impact after mitigation on stormwater facilities as the proposed Project.

**3. Water Supply**

The Alternative's water consumption would be 8,062 gallons per day less than the proposed Project's (see Table VI-3). Impacts to area water infrastructure and supplies would be reduced when compared with the proposed Project. Therefore, Alternative 4 would have less of an impact on water supply than the proposed Project.

**4. Solid Waste**

Alternative 4 would generate 8,663 pounds per week less solid waste than the proposed Project. Landfills would be less affected by the alternative. This alternative would have less of an impact than the proposed Project.

**5. Electricity**

Alternative 4 would generate a total demand load of 3,244,139 kWh. The alternative would demand 4,667,813 kWh less than the proposed Project. The alternative would result in less of an impact to electricity than the proposed Project.

**G. ENVIRONMENTALLY SUPERIOR ALTERNATIVE**

As required by the California Environmental Quality Act (CEQA), an environmentally superior alternative must be identified. In this case, the Reduced Density Alternative would satisfy this requirement. As summarized in **Table VI-3**, the Reduced Density Alternative results in reduced impacts to: aesthetics; air quality; geology; noise; population and housing; public services; recreation; transportation; and utilities and service systems.