
2000 AVENUE OF THE STARS

DRAFT ENVIRONMENTAL IMPACT REPORT

Lead Agency:

LOS ANGELES DEPARTMENT OF CITY PLANNING

200 North Spring Street
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Los Angeles, California 90012
SCH #2002011024
ENV-2001-4027-EIR

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August 2002

<u>SECTION</u>	<u>PAGE</u>
I. INTRODUCTION	1
II. EXECUTIVE SUMMARY	2
III. PROJECT DESCRIPTION	46
IV. ENVIRONMENTAL SETTING	66
V. ENVIRONMENTAL IMPACT ANALYSIS	74
A. AESTHETICS	74
1. Visual Qualities	74
2. Light and Glare	89
3. Shading	93
B. AIR QUALITY	101
1. Emissions	101
2. Wind	120
C. BIOLOGICAL RESOURCES	123
D. CULTURAL RESOURCES	128
E. GEOLOGY	133
F. HAZARDS AND HAZARDOUS MATERIALS	141
G. HYDROLOGY/WATER QUALITY	149
H. LAND USE	154
I. NOISE	175
J. POPULATION AND HOUSING	187
K. PUBLIC SERVICES	197
1. Fire Protection	197
2. Police Protection	201
3. Schools	203
4. Libraries	207
L. RECREATION AND PARKS	209
M. TRANSPORTATION/TRAFFIC	213
N. UTILITIES AND SERVICE SYSTEM	248
1. Wastewater	248
2. Stormwater	252
3. Water Supply	256
4. Solid Waste	262
5. Electricity	267
VI. ALTERNATIVES	272
VII. SIGNIFICANT ENVIRONMENTAL EFFECTS AND IRREVERSIBLE ENVIRONMENTAL CHANGES	303
VIII. GROWTH INDUCING IMPACTS	304
IX. MITIGATION MONITORING PLAN	306
X. PREPARERS OF THE EIR, CONTACTS AND REFERENCES	323
XI. ACRONYMS AND ABBREVIATIONS	329

<u>LIST OF TABLES</u>		<u>PAGE</u>
Table II-1	Existing Uses on the Subject Property	3
Table II-2	Existing Uses on the Area to be Redeveloped	3
Table II-3	Proposed Development	4
Table III-1	Existing Uses on the Subject Property	49
Table III-2	Existing Uses on the Area to be Redeveloped	49
Table III-3	Proposed Development	52
Table IV-1	Related Projects List	68
Table V.B-1	Air Quality Levels Measured at the West LA/VA Hospital & Hawthorne Monitoring Station	104
Table V.B-2	Regional Air Pollutant Emissions from Existing Uses	106
Table V.B-3	Federal and State Carbon Monoxide Standards	106
Table V.B-4	Existing Modeled Carbon Monoxide Concentrations (ppm)	107
Table V.B-5	SCAQMD Regional Pollutant Emission Thresholds of Significance	108
Table VB-6	Total Air Pollutant Emissions Generated by Demolition	110
Table V.B-7	Daily Net Air Pollutant Emissions during Demolition	111
Table V.B-8	Quarterly Net Air Pollutant Emissions during Demolition	111
Table V.B-9	Total Project Emissions	112
Table V.B-10	Net Project Emissions	112
Table V.B-11	Worst Case Future Projections of Carbon Monoxide Concentrations	114
Table V.C-1	Existing Onsite Trees to be Removed	126
Table V.H-1	Trip Generation Per Century City North Specific Plan (CCNSP)	166
Table V.H-2	Consistency with Applicable SCAG Regional Policies	169
Table V.I-1	Modeled Existing Roadway Traffic Noise Levels	179
Table V.I-2	Proposed Traffic Noise Level CNEL Increases (dB)	183
Table V.I-3	Future 2005 With Project Traffic Noise Levels	184
Table V.J-1	Population Growth and Housing Policy Consistency Analysis	191
Table V.K1-1	Fire Station Information	197
Table V.K3-1	Existing Student Enrollment	203
Table V.K3-2	Estimated Student Generation	204
Table V.K3-3	Estimated Student Generation for Related Projects	206
Table V.M-1	Critical Movement Volume Ranges for Determining Levels of Service	220
Table V.M-2	Levels of Services As a Function of CMA Values	220
Table V.M-3	Existing (2001) Conditions, Critical Movement Analysis (CMA) and Level of Service (LOS) Summary	221
Table V.M-4	Existing Trip Generation Analysis Per Century City Specific Plan (CCNSP)	224
Table V.M-5	Existing Use Trip Generation Analysis West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP)	225
Table V.M-6	Existing Trip Generation Analysis Standard LADOT Methodology	225
Table V.M-7	Existing Trip Generation Analysis Revised LADOT Methodology	226
Table V.M-8	LADOT Significant Impact Criteria	226
Table V.M-9	Project Trip Generation Per Century City North Specific Plan	228
Table V.M-10	Project Trip Generation Analysis West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP)	229
Table V.M-11	Project Trip Generation Per Standard LADOT Methodology	229
Table V.M-12	Project Trip Generation Per Revised LADOT Methodology	230
Table V.M-13	Intersection Critical Movement Analysis (CMA) and Level of Service (LOS) Summary Existing (2001) and Future (2005) Conditions	242
Table V.N.1-1	Current Title 24 Requirements Versus Existing Uses	249
Table V.N.1-2	Daily Wastewater Demand from Related Projects	251
Table V.N.3-1	Existing and Proposed Water Demand	259
Table V.N.3-2	Daily Water Demand from Related Projects	261
Table V.N.4-1	Existing Solid Waste Generation	263

Table V.N.4-2	Project Solid Waste Generation	264
Table V.N.4-3	Potential Project Landfills and Capacity	264
Table V.N.4-4	Daily Solid Waste Generation from Related Projects	265
Table V.N.5-1	Energy Consumption from Related Projects	270
Table VI-1	Alternatives Land Use Summary (area to be redeveloped only)	277
Table VI-2	Alternatives Impact Comparison Summary	278
Table VI-3	Alternative 1 – No Project	279
Table VI-4	Alternative 2 – All Office	286
Table VI-5	Utility and Services Usage Comparison by Alternative	285
Table VI-6	Alternative 3 – Mixed Use: Hotel, Retail and Entertainment	291
Table VI-7	Alternative 4 – Reduced Density	297

LIST OF FIGURES

Figure PD-1	Regional Location	47
Figure PD-2	Project Location	48
Figure PD-3	Existing and Proposed Land Use Comparison	50
Figure PD-4	Proposed Site Plan	51
Figure PD-5	Building Elevations	53
Figure PD-6	Building Cross-Section	54
Figure PD-7	Parking Level Plan	56
Figure PD-8	Plaza Level Plan	57
Figure PD-9	Street Level Plan	58
Figure PD-10	Typical Floor Plates for Mezzanine to Level 12	59
Figure PD-11	Proposed Landscape Plan	60
Figure PD-12	Project Driveway and Parking Access Locations	62
Figure PD-13	Artist Rendering of the Pedestrian Corridor	64
Figure ES-1	Surrounding Land Uses	67
Figure ES-2	Related Projects Location Map	72
Figure AE-1	Aerial View of the Project Site Looking Northeast	75
Figure AE-2	Views of the Project Area	77
Figure AE-3	View Along Avenue of the Stars	79
Figure AE-4	Photosimulation of the Proposed Project	82
Figure AE-5	Photosimulation of the Proposed Project Looking North from Avenue of the Stars and Olympic Boulevard	84
Figure AE-6	Photosimulations of the Proposed Project Looking South from Avenue of the Stars	86
Figure AE-7	Comparison of Visibility of Existing and Proposed Structures	87
Figure AE-8	Existing Shadow Pattern – December 21-22 (Winter Solstice)	95
Figure AE-9	Existing Shadow Pattern – June 21-22 (Summer Solstice)	96
Figure AE-10	Proposed Project Shadow Pattern – December 21-22 (Winter Solstice)	98
Figure AE-11	Proposed Project Shadow Pattern – June 21-22 (Summer Solstice)	99
Figure BR-1	Existing Onsite Trees	124
Figure GS-1	Recently Active Faults and Major Earthquakes	137
Figure H-1	Existing Hydrologic Conditions	150
Figure H-2	Proposed Hydrologic Conditions	151
Figure LU-1	Surrounding Land Uses	155
Figure LU-2	West Los Angeles Community Plan Area	157
Figure LU-3	Century City North Specific Plan	158
Figure LU-4	Commercial Zoned Area	159
Figure PS-1	Public Services	198
Figure R-1	Public Recreation	210
Figure T-1	Traffic Study Intersections	214
Figure T-2	Existing (2001) Traffic Volumes – AM Peak Hour	217
Figure T-3	Existing (2001) Traffic Volumes – PM Peak Hour	218
Figure T-4	Net Project Traffic Volumes – AM Peak Hour	232
Figure T-5	Net Project Traffic Volumes – PM Peak Hour	233
Figure T-6	Future (2005) Without Project Traffic Volumes – AM Peak Hour	236
Figure T-7	Future (2005) Without Project Traffic Volumes – PM Peak Hour	237
Figure T-8	Future (2005) With Project Traffic Volumes – AM Peak Hour	240
Figure T-9	Future (2005) With Project Traffic Volumes – PM Peak Hour	241
Figure T-10	Project Demolition and Construction Haul Route	247

APPENDICES**VOLUME II**

- Appendix 1 2000 Avenue of the Stars Tree Information, Envicom Corporation, July 13, 2001; SWA, June 10, 2002.
- Appendix 2 Solar Access/Shade Shadow Analysis, Envicom Corporation, June 12, 2001.
- Appendix 3 Air Quality Assessment for: 2000 Avenue of the Stars, Mestre Greve Associates, July 18, 2002.
- Appendix 4 Final Report Pedestrian Wind Study: Century City Entertainment Center. Redevelopment, Rowan Williams Davies & Irwin Inc., March 29, 2001, July 17, 2001, February 8, 2002.
- Appendix 5 On-going Asbestos Abatement Program for the Site and Demolition and Construction Summary, July 18, 2002.
- Appendix 6 California Natural Diversity Database Rarefind Search for Beverly Hills USGS Quadrangle, Envicom Corporation, June 1, 2001.
- Appendix 7 Report of Geologic-Seismic Hazards Evaluation, Law Crandall, November 13, 2001; and Report of Geotechnical Consultation Proposed High-Rise Office Building and Retail Development, Law Crandall, October 5, 2001.
- Appendix 8 Limited Phase I Environmental Site Assessment Update, Law Crandall, October 31, 2001.
- Appendix 9 Methane Assessment Report, ABC Entertainment Center, Camp Dresser & McKee Inc., October 5, 2001; and Preliminary Assessment of Potential Methane Gas Mitigation Tasks. 2020/2040 Avenue of the Stars Project, Geokinetics Inc., October 3, 2001.
- Appendix 10 Hydrology Summary Letter, KPFF, Consulting Engineers, November 20, 2001.
- Appendix 11 Noise Assessment for: 2000 Avenue of the Stars, Mestre Greve Associates, July 18, 2002.
- Appendix 12 City of Los Angeles Fire Department and Police Department Correspondence.
- Appendix 13 City of Los Angeles Department of Transportation Correspondence.
- Appendix 14 City of Los Angeles Department of Water and Power, Water Availability Assessment.
- Appendix 15 2000 Avenue of the Stars Energy Report and Water Consumption Calculations, Syska Hennessy, Inc., January 18, 2002.
- Appendix 16 Alternatives Trip Generation, Crain and Associates, June 12, 2002.
- Appendix 17 ABC Entertainment Center Historical and Cultural Evaluation, Historical Resource Group, February 6, 2002.
- VOLUME III**
- Appendix 18 Traffic Impact Study for Office, Commercial and Cultural Use Project at 2000 Avenue of the Stars, Century City, Crain & Associates, June 2002.
- Appendix 19 Initial Study, City of Los Angeles Department of City Planning, November 14, 2001.
- Appendix 20 Comment Letters.
- Appendix 21 Scoping Meeting for 2000 Avenue of the Stars, Reporters Transcript, January 14, 2002.

I. INTRODUCTION

The Trammell Crow Company is currently seeking approval of a proposal to redevelop 9.20 acres of a 14.02-acre site within Century City, at the southeast corner of Constellation Boulevard and Avenue of the Stars. The Project site is currently developed with commercial buildings and is known as the ABC Entertainment Center. The proposed Project, referred to as 2000 Avenue of the Stars, includes demolition of two buildings on the Project site and construction of a new commercial office building.

The Project proposal was reviewed by the Los Angeles Department of City Planning, Environmental Review Unit (serving as Lead Agency), an Initial Study was prepared, and it was determined that the Project required a Mitigated Negative Declaration (MND). However, comments requesting the preparation of an Environmental Impact Report (EIR) were received during the public review period for the MND. Consequently, the City and Applicant agreed that an EIR would be prepared. A Notice of Preparation (NOP) was therefore issued for the Project on January 7, 2002 to solicit comments on the proposed content of the EIR. A Public Scoping Meeting was held on January 14, 2002 and public testimony was taken on the environmental impacts of the proposed Project. The NOP was circulated for a period of 30 days. Comments were received on the NOP, and all comments relating to the EIR were reviewed and incorporated to the extent feasible in this EIR.

II. EXECUTIVE SUMMARY

PROJECT DESCRIPTION

The Trammell Crow Company is currently seeking approval of a proposal to redevelop 9.20 acres of a 14.02-acre site within Century City, at the southeast corner of Constellation Boulevard and Avenue of the Stars. The Project site is currently developed with commercial structures that include 3,067,338 square feet (sf) of office space, retail space, a theater, a multiplex cinema, restaurants, and a health club. The proposed Project, referred to as 2000 Avenue of the Stars, includes demolition of two structures on the southwest side of the Project site and construction of a new commercial office building. The proposed building would also provide restaurant, retail, and cultural space, as described further below. The two existing Century Plaza Towers would remain unchanged.

The proposed Project is designed to replace two existing buildings, which no longer meet current standards of operation. The office space contained within the structures is representative of Class B-C buildings¹, and the presence of materials such as asbestos make any renovations short of complete reconstruction prohibitive. The new Project would meet the demand for modern office space in Century City and provides a more efficient use of the property.

PROJECT LOCATION

The proposed Project site comprises the block that is bounded by Constellation Boulevard to the north, Avenue of the Stars to the west, Olympic Boulevard to the south, and Century Park East to the east. The site includes two buildings located at 2020 and 2040 Avenue of the Stars, the Century Plaza Towers on the east side of the block (2029 and 2049 Century Park East), and the diamond-shaped plaza between these buildings. The subject property is located within the boundaries of the West Los Angeles Community Plan and the Century City North Specific Plan.

The proposed Project site is centrally located within Century City. Immediately surrounding uses include the Century Plaza Hotel to the west, commercial buildings to the north and east, and condominiums to the south. To the northwest of the subject property is the Westfield Shoppingtown Century City (formerly the Century City Shopping Center). The surrounding area includes many modern high-rise buildings, including the SunAmerica building, Watt Towers, Fox Plaza, Constellation Place and the St. Regis Hotel.

¹ For the purposes of comparison, office space is grouped into three classes. These classes represent a subjective quality rating of buildings which indicates the competitive ability of each building to attract similar types of tenants. A combination of factors including rent, building finishes, system standards and efficiency, building amenities, location/accessibility and market perception are used as relative measures. Building amenities include services that are helpful to either office workers or office tenants and whose presence is a convenience within a building or building complex. Examples include food facilities, copying services, express mail collection, physical fitness centers or child care centers. As a rule, amenities are those services provided within a building. The term also includes such issues as the quality of materials used, hardware and finishes, architectural design and detailing and elevator system performance.

Class A: Most prestigious buildings competing for premier office users with rents above average for the area. Buildings have high quality standard finishes, state of the art systems, exceptional accessibility and a definite market presence.

Class B: Buildings competing for a wide range of users with rents in the average range for the area. Building finishes are fair to good for the area and systems are adequate, but the building does not compete with Class A at the same price.

Class C: Buildings competing for tenants requiring functional space at rents below the average for the area.

Source: Building Owners and Managers Association (BOMA), Building Classification Website, www.boma.org/classes.htm, March 7, 2002.

EXISTING DEVELOPMENT

The 14.02-acre subject property is zoned C2-2-0 and is currently developed with a commercial complex that includes office buildings, theater, restaurant, retail and health club space as shown in **Table II-1**.

Table II-1
Existing Uses on the Subject Property

Existing Use	Size ²
Office	2,646,387 sf
Theater	148,481 sf
Restaurant	158,680 sf
Retail	72,856 sf
Health Club	40,934 sf
Total	3,067,338 sf

These uses are contained within two eight-story buildings at 2020 and 2040 Avenue of the Stars and the two 44-story Century Plaza Towers at 2029 and 2049 Century Park East. A six-level below-ground parking structure beneath the site currently provides parking for all uses onsite. A 3-acre public plaza is located between the two sets of buildings. A paved plaza area provides benches and a small flower garden.

The area of redevelopment encompasses 9.20 acres, which includes the two eight-story structures at 2020 and 2040 Avenue of the Stars. **Table II-2** shows existing uses on the portion of the Project site to be redeveloped. Office use constitutes the largest use in the existing eight-story structures.

Table II-2
Existing Uses on the Area to be Redeveloped

Existing Use	Size
Office	287,701 sf
Theater	148,481 sf
Restaurant	144,390 sf
Retail	57,316 sf
Health Club	40,934 sf
Total	678,822 sf

PROPOSED DEVELOPMENT

The proposed Project would redevelop the western portion of the subject property. This project includes replacement of two existing buildings along Avenue of the Stars with a Class "A" office building, renovation of the existing plaza, and modification of structural supports located in the parking structure. The existing Century Plaza Towers along the east side of the site would not be modified by the proposed

² All building areas in this document are expressed in Floor Area as defined by the Century City North Specific Plan, unless otherwise noted.

Project. Overall, site development would increase from 3,067,338 to 3,167,463 square feet (sf). Each of the Project components is described below.

Proposed Office Building

As shown on **Table II-3**, the proposed building would include approximately 778,947 square feet of office, restaurant, retail, and cultural space. The office building would contain “Class A” office space, including upgraded utilities, optimal floor plates that meet current market demands, energy efficient equipment and materials, and amenities.

**Table II-3
Proposed Development**

Proposed Use	Size
Office	719,924 sf
Restaurant	30,527 sf
Retail	18,318 sf
Cultural	10,178 sf
Total	778,947 sf

The proposed 15-story structure would have an approximate height of 215 feet above grade at the plaza level, and 201 feet above grade on Avenue of the Stars. Two of the 15 floors would be located below grade on Avenue of the Stars and above grade from the plaza level. The building would be anchored on the north and south ends, and have an opening in the center of the structure. The building would be of steel frame and glass curtain wall construction, with two elevator banks (one serving each half of the building). The central opening in the structure, a character-defining element, would give it a landmark presence.

This design feature addresses market demands for a unique office environment. The large opening is created by spanning between the two ends of the building at the upper and lower levels, creating larger and smaller floor plate sizes. From street level on Avenue of the Stars, this rectangular, open-air space would frame views of the two triangular towers in the distance. Pedestrian entrance to the building would be from both east and west. Access from the parking levels would also be available directly from centrally located escalators and elevators.

Restaurant space would be located on the plaza level. These restaurants would take advantage of the plaza views and provide new dining opportunities for lunch and dinner service at a range of price levels.

Plaza Renovation

The renovated landscaped plaza for the Project provides an amenity for use by employees of and visitors to Century City. The landscape design offers an opportunity to provide an inviting landscaped area in an office environment. The three-acre landscaped plaza would consist of a central lawn surrounded by office towers, restaurants, and retail uses. A pedestrian promenade would direct guests from Avenue of the Stars through the site, passing by sitting areas, gardens, flowering canopy trees, courtyards, and grassy slopes.

The landscaped plaza would transform the existing plaza space into a functional venue for a myriad of uses in the heart of Century City. The basic design and configuration of the proposed plaza lends itself to a variety of events and gatherings. The proposed plaza could be an on-going home for a

range of outdoor events and performances throughout the year. In addition, the plaza could host special events, social and corporate parties.

Landscape Plan

The existing central hardscape plaza would be replaced with a diamond-shaped central lawn area, flanked by jacaranda and poplar trees along the northwest and southern edges. Additional rows of jacaranda trees would be planted between the lawn and the restaurant on the north side of the Project. Pine trees would be planted on the slopes to the south and east of the cultural facility and on the east and west sides of the garage access from Constellation Boulevard.

Cultural Facility

As an integral part of the proposed Project, a 10,178-sf facility would be constructed adjacent to the central plaza, specifically for a cultural use. It is intended to house exhibition areas for one or more major cultural institutions, and may house an art gallery, or branch of a notable museum. Together with the three-acre landscaped plaza area, this building, would create a world-class amenity for both tenants of surrounding offices as well as nearby residents and visitors. The facility would be secure and accessible to the public.

Parking and Access

The existing parking supply for the overall site is 5,922 spaces. Currently, there are 45 parking spaces at grade, 186 spaces on parking level A, 604 spaces on level B, 1,144 spaces on level C, 1,155 spaces on level D, 1,151 spaces on level E and 1,186 spaces on level F, totaling 5,471 parking spaces onsite. In addition, there are 451 off-site parking spaces in the garage west of the Century Plaza Hotel, which are covenanted for the site. People parking at the off-site garage, located at 2030 Century Park West, access the Project site via a walkway located to the south of the Century Plaza Hotel. This path leads to the below grade plaza of the Hotel and then through the pedestrian corridor under Avenue of the Stars. With the new project, the pedestrian corridor would lead pedestrians directly into the lobby of the new building.

Construction of the proposed Project would remove all of the site uses except for the Century Plaza Towers and the subterranean parking garage. Due to the structural improvements to the subterranean columns, parking spaces in the garage would be modified.

The total code required parking spaces for the proposed Project is 6,065 spaces and includes parking space reductions pursuant to Los Angeles Municipal Code Section 12.21-A 4(c) and Section 12.24-Y. Section 12.21-A 4(c) provides for parking reductions for bicycle spaces provided on-site. In addition, Section 12.24-Y provides further parking reductions for commercial buildings located within 1,500 feet from a transit facility. The Project is located one block east from the transit facility being constructed at the Constellation Place office building, at the southwest corner of Constellation Boulevard and Century Park West.

The preferred parking plan would provide all code required parking on-site. The Project would provide 45 parking spaces at grade, 172 spaces on parking level A, 597 spaces on level B, 1,222 spaces on level C, 1,233 spaces on level D, 1,229 spaces on level E and 1,264 spaces on level F. Additionally the Project would provide parking spaces on portions of two levels that currently do not provide parking. This would include 409 spaces on the Parking level and 187 spaces on the Plaza level for a total of 6,358 on-site parking spaces. The proposed parking plan would include tandem parking with parking attendants on all parking levels except level B.

Alternatively, the Project would satisfy all code required parking by providing on-site and off-site parking. Under this plan the Project would provide 45 spaces at grade, 177 spaces on parking level A, 595 spaces on level B, 1,112 spaces on level C, 1,123 spaces on level D, 1,119 spaces on level E and 1,154 spaces on level F. Additionally the Project would provide parking spaces on portions of two

levels that currently do not provide parking. This would include 372 spaces on the Parking level and 170 spaces on the Plaza level for a total of 5,867 on-site. Also, 451 off-site spaces would be provided, for a total of 6,318 spaces. Currently, 451 off-site parking spaces are provided by covenant and agreement in the parking garage at 2030 Century Park West.

Among the updated transportation management items, vehicles would access the site via the subsurface parking lot and valet drop-off. The valet drop-off and pick-up area on Avenue of the Stars has been designed to provide maximum efficiency and convenience for visitors and would provide direct access to the parking garage. The parking spaces located on the Plaza level would be allocated to valet services. Access to the parking garage would continue to be provided from Constellation Boulevard, the driveway on Century Park East and Olympic Boulevard.

Pedestrian access to the Project and the plaza would be available from numerous locations along Avenue of the Stars, Constellation Boulevard and Century Park East. Pedestrian access into the new office building would be available from Avenue of the Stars on the west side, as well as from the plaza on the eastern side. In compliance with the Century City North Specific Plan, a grade-separated pedestrian crossing is being provided below Avenue of the Stars to allow pedestrians to easily walk between the Century Plaza Hotel and the retail, restaurants and amenities in the 3-acre landscaped plaza in the 2000 Avenue of the Stars project.

The pedestrian corridor would connect the existing courtyard at the Century Plaza Hotel to the new plaza elevation by way of a well-lit and ventilated pedestrian corridor under Avenue of the Stars that would be approximately 16 feet wide, and between 10 and 15 feet in height. A canopy of signage would mark the enlarged entry on the Hotel side, and a series of murals would decorate the pedestrian corridor itself. The pedestrian corridor would have a tiled floor, plaster walls and a plaster ceiling with cove lighting. The pedestrian corridor slopes down from the Hotel courtyard about 5 feet over 150 feet to an escalator that connects up one level to the Plaza level lobby. The Plaza level lobby is lined with 5,000 square feet of retail and connects directly to the landscaped plaza. Pedestrian access between the parking levels and the structure would be available using elevators, escalators and stairwells, as noted above.

Demolition/Construction Process

As mentioned above, the Project would involve the removal of the two existing eight-story buildings, and development of the proposed 15-story building. A summary of the demolition and construction process is included under **Appendix 5**. The demolition and construction process would occur over a 25-month period. During construction, the pedestrian corridor would be unavailable for usage. During that time, pedestrians coming from the west would access the Project site by at grade pedestrian crossings across Avenue of the Stars.

At the Project site, there are 1,717 parking spaces allocated to the existing ABC Entertainment Center buildings. During the construction phase, these spaces will all be available for construction employee vehicle parking. Project construction will involve a maximum of approximately 200 construction worker vehicles on site at any given time. The Project applicant will also be encouraging a ride share program for construction employees to decrease the number of construction vehicles accessing the site. Construction will be phased so that only limited portions of the parking areas will be impacted and unavailable for vehicle parking. Out of the available 1,717 parking spaces, it is anticipated that approximately 300 parking spaces will be unavailable at any given time due to the construction work. In addition, there are excess parking spaces available in nearby, off-site parking facilities in Century City for rental, if necessary. Further, construction workers will be prohibited from using street parking spaces during the construction period.

PROJECT APPROVAL AND INTENDED USE OF THE EIR

This Environmental Impact Report (EIR) will serve as the environmental document for all Project approvals that may be subject to the California Environmental Quality Act (CEQA). These requested actions and approvals are expected to include, but may not be limited to the following list:

City of Los Angeles

(The Project may require the following approvals from the City of Los Angeles, including its component Department and Agencies):

- Major Project Conditional Use Permit by the Department of City Planning.
- Project Permit Compliance Review by the Department of City Planning.
- Building Permits and Code modifications if necessary, from the Department of Building and Safety.
- Haul Route Approval from the Building and Safety Commission.
- Street Improvement Permits from the Bureau of Engineering.
- Conditional Use Permit for alcohol service at restaurants.
- Parking Facility Modification Approval by the Department of Building and Safety for tandem parking.
- Reduction of off-street parking spaces approval by the Department of City Planning.
- Intersection improvement and potential bus stop relocation approvals to facilitate pedestrian travel.
- Other approvals, or permits necessary for the Project, including, but not limited to, a vesting tentative tract map, parcel map or other subdivision, tree removal permits, conditional use permits, lot line adjustments, public works permits and variances.

Other

(The proposed Project may require additional approvals as follows):

- Federal Aviation Administration (FAA) Notice of Proposed Construction or Alteration.
- RWQCB discharge permits.
- Other approvals or permits necessary for the Project.

PROJECT OBJECTIVES

The 2000 Avenue of the Stars development proposal is designed to accomplish the following objectives, as provided by the Project applicant:

- 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.

AREAS OF CONTROVERSY KNOWN TO LEAD AGENCY

This section identifies the areas of controversy known to the lead agency including issues raised in comments to the NOP. Areas of known controversy include: removal of the Shubert Theater, construction impacts, wind impacts, land use issues, parking supply, trip generation, and transportation impacts.

Each of these areas of known controversy is analyzed in Section V. In addition, the comment letters received on the project are attached as Appendix 20.

ENVIRONMENTAL IMPACT ANALYSIS SUMMARY

AESTHETICS

Aesthetic impacts for the Project have been evaluated under three general categories: 1) Visual Qualities, which addresses the general aesthetic value and view impacts relative to the surrounding neighborhood, 2) Lighting, which considers Project night-time illumination or glare impacts on the surrounding neighborhood, and 3) Shading, which evaluates impacts of daytime shading impacts resulting from construction of the Project.

1. Visual Qualities

Project Impacts

Aesthetic Character

Consistent with the architectural style common throughout Century City, the design of the proposed 15-story Project would be clean and modern in style, utilizing glass and steel as major materials. The Project incorporates the unique design element of a central opening in the structure. This design element gives the structure a landmark presence. The architectural design of the Project is consistent with the existing aesthetic image and character of Century City, and would not represent a negative aesthetic effect. The existing paved plaza would be replaced with a diamond shaped central lawn area, flanked by jacaranda and poplar trees along the northwest and southern edges. Additional rows of jacaranda trees would be planted between the lawn and the restaurant use on the north side of the Project. Project implementation would remove some landscape elements including all vegetation within the area to be redeveloped. However, the Project includes a landscaping program

which would expand the Project's landscaped areas. The loss of mature ornamental trees is temporary and would not substantially detract from the aesthetic character of the Century City area.

In summary, the proposed Project site forms a part of a completely urbanized landscape in the heart of Century City. The surface treatments, height, and visual massing effect of the completed structure and plaza would be in character with the surroundings, including the Century Plaza Hotel, and would not result in a degradation of the visual qualities or character of the site and surroundings.

The scope of the proposed Project, when viewed within its urban setting would be consistent with, and in scale with the surrounding development. The loss of mature on-site vegetation has the potential to significantly impact the visual character and quality of the site. Incorporation of mitigation measure AE-1 would reduce potential impacts to less than significant levels. Incorporation of mitigation measure AE-2 is included to further reduce potential impacts to the visual character and quality of the site.

Alteration of Views

Based on the visual analysis prepared for the Project, the increased height of the proposed building compared to the existing structures would increase the visibility of the Project site. However, due to the concentration of off-site view-blocking structures, increased visibility is predominantly limited to street corridors that are variously oriented and "channeled" 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.

In summary, 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 high- and mid-rise structures that surround the Project site serve to block many views of the existing and proposed buildings. The proposed Project would be of a height and bulk consistent with such views, and constructed of materials appropriate for the modern urban landscape of Century City. The future views of the Project site would be in keeping with the valued character of Century City, and no significant view impact would occur.

Mitigation Measures

Incorporation of mitigation measure AE-1 would reduce the Project's potential aesthetic character impacts to less than significant levels. Incorporation of mitigation measure AE-2 is included to further reduce these impacts.

- AE-1** All open areas not used for buildings, driveways, parking areas, or walkways shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the Los Angeles Department of City Planning.
- AE-2** The owners shall maintain the Project site to be clean and free of debris and rubbish and promptly remove any graffiti from walls, pursuant to Municipal Code Sections 91.810F, 91.8904.1, and 91.1707-E.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts after the implementation of mitigation measures.

Cumulative Impacts

The proposed Constellation Place project located at the corner of Century Park West and Constellation Boulevard, would be visible in some of the same views as the proposed Project. These

views would be limited, because of the size of the new building and the presence of the Century Park Hotel which is located between the two buildings, to pedestrians and motorists traveling on Constellation Boulevard. The taller buildings which surround the proposed building, of which the currently under construction 38-story Constellation Place building is one, serve to block views of or from the Project site. No other related projects are located close enough to the Project site to cumulatively contribute to the Project's overall less than significant after mitigation aesthetic impact, or to the Project's alteration of view impacts, which are less than significant in any case. Therefore, no significant cumulative impact on aesthetic character or alteration of views would occur.

2. Lighting and Glare

Project Impacts

Illumination from the proposed Project is not likely to impact the Century City Hospital and the Century Park East condominiums due to distance and the presence of the 44-story Century Plaza Towers which are located generally between the proposed building and these uses. Similarly, the Century Woods residential area is unlikely to be adversely affected by nighttime illumination due to distance and the intervening presence of both the St. Regis and Century Plaza Hotels. Portions of the Century Plaza Hotel, St. Regis Hotel and the Park Place condominium complex buildings, which front toward the Project site would be exposed to nighttime illumination from the Project area. The proposed uses, distance to the proposed structure, and incorporation of proposed design features, would serve to reduce illumination effects. In the short term, elimination of vegetation for construction access may increase the lighting that would be visible from the Park Place condominiums. Without mitigation, this impact would be potentially significant. In the long run, illumination from the site would increase resulting in adverse but not significant impacts. However, this determination assumes no unusual lighting conditions or features. Without additional measures assuring this, the Project could adversely affect adjacent light sensitive areas of the Century Plaza Hotel, St. Regis Hotel and Park Place condominium complex. Reflected sunlight from the proposed building can be a problem to motorists when the sun is close to the horizon, allowing reflected glare to interfere with a driver's vision. Consequently, glare impacts may occur during morning and early evening hours when the sun is near the horizon. Potentially affected road segments would include portions of Olympic and Constellation Boulevards and Avenue of the Stars. The Project's impact would vary by season and time of day and is of short duration, which without mitigation (such as use of non-mirrored glass) could result in a significant impact.

Mitigation Measures

The following measures will eliminate any potential for significant impacts due to Project lighting.

Lighting

- AE-3** Exterior lighting shall be designed to shield and direct illumination to the Project site, and/or areas which do not include light-sensitive uses.
- AE-4** The Project shall not install flashing, moving, strobe, or blinking outdoor lights along the western and southern boundaries of the Project site or on the south-facing exterior wall of the proposed building.
- AE-5** Landscape plans shall utilize large canopy trees particularly along the southern perimeter of the Project site to the extent feasible.

Glare

- AE-6** The exterior of the proposed building shall be constructed of materials such as high-performance tinted non-mirrored glass, painted metal panels and pre-cast concrete or fabricated wall surfaces.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts after the implementation of mitigation measures.

Cumulative Impacts

The proposed Constellation Place project located at the corner of Century Park West and Constellation Boulevard, is to be constructed of low reflective building materials. The building would not utilize mirrored glass or other highly reflective exterior coverings. Glare from the Constellation Place building will be directed towards portions of Century Park West and Constellation Boulevard. It was determined that with mitigation restricting the use of high reflective exterior materials, that any adverse impact would be reduced to a less than significant level. Additionally, none of the same roadway segments would be affected. Therefore, the Constellation Place building would not cumulatively contribute to the Project's less than significant impacts after mitigation. No significant cumulative impact would occur. No other related projects are located close enough to the Project site to cumulatively contribute to the Project's overall less than significant after mitigation light and glare impacts. Therefore, no significant cumulative impact on light or glare would occur.

3. Shading**Project Impacts**

The proposed fifteen-story Project would be taller than the existing eight-story buildings, and the Project's shadows would be correspondingly longer at all times of the year. The proposed building footprint, however, would not be as wide in an easterly direction. The result of the adjusted footprint is that the effect of the added building height would not be manifested in as wide-spread an area being shaded in the afternoons, over that already shaded by existing structures, as might have been anticipated.

Winter and summer solstice proposed Project shadows would be completely confined to the interior commercial landscape of the Century City North Specific Plan Area, an area containing numerous mid- and high-rise commercial buildings. No Project shading of residential land uses either inside or outside of the above Specific Plan Area would occur.

Mitigation Measures

Based on stated thresholds of significance, no significant shadow impacts would occur. Therefore, no mitigation measures are required or recommended.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

The proposed 38-story Constellation Place building located at the corner of Century Park West and Constellation Boulevard, will cast long shadows that will shade areas that will also be affected by shadows cast by the proposed Project. However, the areas they shade in common are all commercial properties within the Century City North Specific Plan, and not residential areas outside the Specific Plan area. Further, these shadows would occur from Constellation Place with or without the proposed Project. No significant cumulative impact would occur. No other related projects are located close enough to the Project site to cumulatively contribute to the Project's overall less than significant shadow impacts. Therefore, no significant cumulative impact on shadows would occur.

AIR QUALITY

1. Emissions

Project Impacts

Construction Air Pollutant Emissions

Temporary air quality impacts would result from Project construction and demolition activities. Air pollutants would be emitted by construction equipment and fugitive dust would be generated during demolition of the existing buildings on site. Peak periods of demolition would result in the greatest levels of air pollution emissions.

The existing office space, retail uses, theater, cinema and health club would continue to generate emissions on the Project site without the Project. The net changes in pollutants generated by the demolition and construction of the Project are determined by subtracting the emissions that would be generated with the existing land uses from the modeled demolition-related emissions. The Project results in a net reduction in emissions during demolition for all pollutants with the exception of PM₁₀. The projected net increase in PM₁₀ emissions during demolition is 22.3 pounds per day. This is below the SCAQMD significance threshold of 150 pounds per day. This phase of construction would generate the highest emission levels, and emissions from all other phases of construction would be below the thresholds. Therefore, the Project does not result in a significant short-term air quality impact.

Operational Phase Impacts

Regional Air Quality

The primary source of regional emissions generated by the proposed Project will be from motor vehicles. Other emissions will be generated from the combustion of natural gas for space heating and the generation of electricity. Emissions will also be generated by the use of natural gas and oil for the generation of electricity off-site. The existing office space, retail uses, theater, cinema and health club would continue to generate emissions on the Project site without the Project. The net changes in pollutants generated by the Project are determined by subtracting the emissions that would be generated with the existing land uses in future years from the modeled Project emissions. The Project results in a net reduction in emissions. Air pollutant emissions would be less with the proposed Project than with continuation of the current uses. Emissions would be reduced with the Project. As net emissions would be less than zero, the Project would be well below SCAQMD thresholds, and the operation of the Project would not result in any significant air quality impacts.

Local Air Quality

Carbon monoxide (CO) is the pollutant of major concern along roadways because, motor vehicles are the most notable source of CO. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network, and are used as an indicator of its impacts on local air quality. Local air quality impacts can be assessed by comparing future carbon monoxide levels with State and Federal carbon monoxide standards, and by comparing future CO concentrations with and without the Project.

A significant local air quality impact occurs if the modeled CO concentrations exceed the 1-hour or 8-hour standard and the Project results in a substantial concentration increase (1 ppm for 1-hour, and 0.45 ppm for 8-hour) over the future without Project conditions. The 1 hour CO standards are not projected to be exceeded in the future with or without the Project. The 8 hour CO standard at both intersections would be exceeded in the future without the Project and at Intersection #2 with the Project. However, in both instances the with Project concentrations would be lower than the future without Project concentrations. Therefore, the proposed Project will not result in a significant local air quality impact.

Mitigation Measures

Construction Phase Mitigation

Emissions from construction of the Project are not considered significant and the Project does not result in a significant regional air quality impact. Implementation of the following mitigation measure would further reduce Project related construction impacts:

- AQ-1** The Project shall comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Reasonably Available Control Measures (RACM) for all fugitive dust sources, and the Air Quality Management Plan (AQMP), which identifies Best Available Control Measures (BACM) and Best Available Control Technologies (BACT) for area sources and point sources, respectively.
- AQ-2** All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- AQ-3** The applicant or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.
- AQ-4** All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- AQ-5** All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- AQ-6** All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- AQ-7** General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- AQ-8** The Project applicant shall be required to coordinate with a representative of the Santa Monica Transit Parkway Project regarding construction-related activities.

Operational Phase Mitigation

Emissions from operation of the Project are not considered significant and the Project does not result in a significant regional air quality impact. No mitigation is required.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

Of the projects noted in the related projects table (Section IV, Table IV-1), it is possible that some may overlap schedules with the Project and raise the issue of significance of cumulative construction air quality impacts. The closest of these include Constellation Place, Santa Monica Boulevard Transit Parkway project, Westfield Shoppingtown Century City Expansion, and the Fox Studio Expansion.

The AQMP anticipates growth and associated construction in the region, consistent with SCAG projections. Each project must be evaluated for the need for CEQA analysis, and mitigation measures applied to reduce impacts where appropriate.

The construction schedules for each of the projects discussed above could coincide; however, because initiation and completion of the projects depends in part on economic and other unpredictable factors, any overlap is uncertain. For example, the Fox Studios project has been approved for some time, yet not all of the construction has been initiated. Further, construction impacts are short term, and will cease upon occupancy/opening of the related projects. It is unlikely that the worst-case situation, where all four related projects are under construction with their emissions, would occur.

Further, it is noted that construction air quality emissions vary considerably from day to day, and the worst-day emissions are assumed for purposes of this analysis. In addition, each of the related projects has been required to mitigate their impacts to the maximum extent feasible. Thus it is likely that actual air emissions will be less than predicted. In any case, the proposed Project's contribution is substantially less than significant (the 22.3 lbs. per day projected Project construction emissions of PM₁₀ are only 15% of the SCAQMD threshold of 150 lbs. per day, all other emissions are reduced). However, the Santa Monica Transit Parkway Project is currently scheduled to be under construction at the same time as the proposed Project. Such scheduling, coupled with other projects which could commence construction during this time could result in a potentially significant cumulative air quality impact due to construction emissions.

The Basin has been designated by the U.S. Environmental Protection Agency (EPA) as a non-attainment area for ozone, carbon monoxide, and suspended particulates (PM₁₀). Data presented in Table V.B-1 shows that ozone and particulates are the air pollutants of primary concern in the Project area. The State ozone standard was exceeded two days in the year 2000, four days in 1999, seven days in 1998 and six days in 1997; the Federal standard was only exceeded one day in the past four years, in 1998. The data from the past four years shows a downward trend in the maximum ozone concentrations and the number of days exceeding the State and Federal ozone standards. Over the past four years, State standards for PM₁₀ have been exceeded as few as and as many as days per year. There does not appear to be any trend toward fewer days of exceeding the standard, although the maximum level in 2000 was the lowest in the past four years.

Ozone is a secondary pollutant; it is not directly emitted but rather the result of chemical reactions between other precursor pollutants, most importantly hydrocarbons and NO₂. The net changes in pollutants generated by the Project are determined by subtracting the emissions that would be generated with the existing land uses from the Project's emissions. The Project results in a net reduction in emissions. Emissions of precursor pollutants would be reduced during Project construction and operation when compared to existing conditions. Therefore, the Project would result in a cumulative reduction in ozone levels.

Carbon monoxide (CO) is another important pollutant that is due primarily to motor vehicles. Data presented in Table V.B-1 indicates that CO levels in the Project region are currently in compliance with the State and Federal 1-hour and 8-hour standards. As shown in Table V.B-10, the Project would result in a net reduction in CO levels over future without Project conditions. The Project would not contribute to a cumulative increase in CO levels in the region.

2. Wind

Project Impacts

A Pedestrian Wind Study was prepared by Rowan Williams Davies and Irwin Inc. (RWDI) to assess the wind environment around the subject property in terms of pedestrian comfort and safety for typical summer and winter seasons, and identify impacts associated with implementation of the Project. The study was prepared using a 1:400 scale model of Century City, which included existing

and proposed configurations of the subject property, and all relevant surrounding buildings and topography within a 1,600 feet radius of the study site. The model was placed in a boundary layer wind tunnel. Up to seventy wind speed sensors were placed throughout the model to measure mean and gust wind speeds at a full scale height of approximately 5 feet.

Overall, wind speeds throughout the proposed Project area would be considered acceptable for their planned activities. 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. As in the existing condition, several locations around the Century Plaza Towers were found to have uncomfortable and/or unsafe wind conditions. These conditions were caused by the existing Century Plaza Towers configuration, and are not negatively affected by the proposed development. It is anticipated that no location within the Project redeveloped area would experience unsafe conditions; therefore wind would have a less than significant impact on the proposed Project. Additionally, the Project would result in a less than significant impact at off-site locations.

Mitigation Measures

The proposed Project would not result in a significant wind impact. No mitigation is required.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

The wind study prepared for the Project indicated that the proposed redevelopment has a building mass similar to that of existing conditions on site and would not have any negative impact on the wind environment in the area. Therefore, the project contribution to wind impacts would not be cumulatively considerable.

BIOLOGICAL RESOURCES

Project Impacts

Within the area to be redeveloped, a total of 113 trees would be removed during construction. Of these, sixty-seven are mature trees with trunk diameters of twelve inches or greater. While forty-six have trunk diameters of less than twelve inches. The majority (nearly seventy-five percent) of trees to be removed are ornamental fig trees (*Ficus* sp.), laurelleaf snailseed (*Cocculus laurifolius*), and London plane (*Platanus acerifolia*) trees. Other trees to be removed include: Canary Island pine (*Pinus canariensis*), Brazilian pepper trees (*Schinus terebinthifolius*), evergreen pear trees (*Pyrus kawakamii*), goldenrain (*Koelreuteria paniculata*), coast redwood (*Sequoia sempervirens*), sweet gum (*Liquidamber styraciflua*), sweetshade (*Hymenoporum flavum*), and Chinese flame (*Koelreuteria bipinnata*).

Replacing this vegetation would be a diamond-shaped central lawn area, flanked by jacaranda and poplar trees along the northwest and southern edges. Additional rows of jacaranda trees would be planted between the lawn and the restaurant on the north side of the Project. Pine trees would be planted on the slopes to the south and east of the cultural facility and on the east and west sides of the garage access from Constellation Boulevard. Both the existing and proposed vegetation consists of non-native ornamental species and is not considered habitat for any state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern.

The Project site does not contain any locally designated natural habitat or plant community, wetland habitat, or wildlife movement/migration corridors. The potential impacts associated with implementation of the proposed Project would be the loss of mature trees and landscaping throughout the site. The loss of ornamental landscaping is potentially significant. Implementation of mitigation measure BR-1 would reduce this impact to a less than significant level.

Mitigation Measures

- BR-1** Prior to the issuance of a grading permit, a plot plan prepared by a reputable arborist, indicating location, size, type, and condition of all existing trees on the site shall be submitted for approval to the Department of City Planning and the Street Tree Division of the Bureau of Street Services. All trees in the public right-of-way shall be subject to the current Street Tree Division Standards. The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site on a 1:1 basis, shall be required for unavoidable loss of trees greater than 12" diameter at breast height (DBH) on the site, and to the satisfaction of the Street Tree Division of the Bureau of Street Services and the Advisory Agency.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts to biological resource after mitigation.

Cumulative Impacts

The Environmental Setting Section (Section IV) provides a list of related projects that are planned or are under construction in the Project area. Most of the development planned for the area is within the intensely developed portions of West Los Angeles, Century City, and Beverly Hills. The proposed Project does not result in significant impacts to any valued biological resource, and therefore would not contribute to any cumulative effects.

CULTURAL RESOURCES

Project Impacts

A Cultural and Historical Evaluation report was prepared by Historical Resources Group (HRG), and provides a brief discussion of the Project site within several applicable historic contexts and an evaluation of the site according to local, State, and Federal criteria for historic designation.

The ABC Entertainment Center can be evaluated within several contexts: as a live theater and arts complex in Los Angeles and in connection with the Shubert organization; as an example of late Modern architecture; and as a component of the Century City Master Plan. The Center is discussed briefly within each of these contexts below.

The ABC Entertainment Center is not strongly associated with the activity of the Shubert organization during a significant period of its history and is not prominent enough in theater in Los Angeles, or old enough to be considered historic. Therefore, it would not be considered eligible for listing in any National, State, or Local historic listing based on its associative value or for its "contribution to the broad patterns of our history," as National Register Criterion A requires (National Register Bulletin 15, page 12).

The ABC Entertainment Complex is not associated with a significant architect and is not an important or strongly characteristic example of its architectural style. Therefore, it would not be considered eligible for any National, State, or Local historic designation based on National Register Criterion C, which requires that a property must "embody distinctive characteristics of a type, period, or method of construction; represent the work of a master; (or) possess high artistic value" (National Register Bulletin 15, page 17).

Although the Century City Master Plan was designed by significant architects and planners, many of the component buildings themselves have been modified over the years and the presence of so many new structures keeps the area from being a discernable historic district, where buildings and features

from the period of significance would have to predominate. Therefore, the area would be unlikely to qualify under National Register criteria for its significance in planning history and would not be considered eligible for any National, State, or Local historic designation and the ABC Entertainment Center would not be considered a contributing building within any such district.

Overall, the ABC Entertainment Center does not meet the criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, or the list of City of Los Angeles Historic-Cultural Monuments. The property is an original part of the Century City Master Plan, but the center itself is different from the original intent of the master plan. The buildings and the complex lack architectural distinction, have not played a significant role in local history, and are not a part of an established historic context. The Theme Plaza was not developed as a true "cultural center" in the language of the 1966 iteration of the master plan, and is not a cultural center in the sense that the Music Center in downtown Los Angeles clearly is. It was rather one of two entertainment and dining venues that were developed in Century City, one at the Theme Plaza and the other within the shopping center in the northwest of Century City. Because it has no historic, architectural, or cultural significance, the ABC Entertainment Center is not a historic property.

The applicant does not propose to remove the existing six-level subterranean parking structure. Excavation for the Project would consist of marginal subsurface disturbance associated with strengthening the existing foundation to support the structure within a smaller footprint as compared to existing conditions. Columns and footings would be expanded appropriately. As designed, the Project would modify approximately 74 columns. The Project would not excavate below the fill level of the 1969 excavation. Therefore, the proposed Project would not encounter any archaeological or paleontological resources if any did exist, which have not been previously disturbed.

Mitigation Measures

Based on stated thresholds of significance, no significant impacts to historic, archeological or paleontological resources would occur. Therefore, no mitigation measures are required or recommended.

Significant Project Impacts After Mitigation

The proposed project would not result in significant unavoidable impacts on cultural resources.

Cumulative Impacts

The Environmental Setting Section (Section IV) provides a list of related projects that are planned or are under construction in the Project area. Related projects at Harvard Westlake Middle School, and Palazzo Westwood would result in significant adverse historical impacts after mitigation. The proposed Project does not result in impacts to cultural resources, and therefore would not contribute to any cumulative effects.

GEOLOGY

Project Impacts

The Project geotechnical study examined potential adverse subsurface conditions such as liquefaction potential, underlying materials and presence of expansive soils. Geotechnical analysis examined the potentially significant impacts with regard to excavation, seismicity and groundwater. The site is not within an Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. The closest Alquist-Priolo Earthquake Fault Zone, established for a portion of the Inglewood fault of the Newport-Inglewood fault zone, is located approximately 2.73 miles to the southeast of the site. Based on the available geologic data, active or potentially active faults with the potential for surface fault rupture are not known to be located directly beneath or projecting toward the site. Due to the seismically active nature of Southern California, the site could potentially be subject to strong ground shaking from

earthquakes produced by faults within the region. Potential impacts from seismic ground shaking are present throughout Southern California and would not be higher at the Project site than for most of the region. Impacts associated with seismic shaking are considered potentially significant. However, Project compliance with applicable Uniform Building Code requirements would reduce impacts to a less than significant level.

According to the California Division of Mines and Geology (1999), the City of Los Angeles Safety Element (1996), and the County of Los Angeles Seismic Safety Element (1990), the site is not within an area identified as having a potential for liquefaction. Groundwater was not encountered in previous borings within 50 feet of the ground surface. Additionally, the Pleistocene age sediments underlying the site are generally dense silty sand and firm clay and clay silts and are not considered prone to liquefaction. Therefore, the potential for liquefaction and the associated ground deformation beneath the site is considered to be low.

The lack of steep slopes located on and around the property precludes the potential for landslides. There are no known landslides in the area of the subject property, nor is there potential for other slope stability issues.

Between 1955 and 1970, documented subsidence beneath the site was approximately 0.2 feet (Hill et al., 1979). However, this subsidence is regional in nature and there is no evidence that differential settlement or damage to structures has occurred as a result of this phenomenon at the site or in the general area. Therefore, regional subsidence is not anticipated to adversely affect the structures at the site.

Mitigation Measures

- G-1** To reduce seismic risks, Project structures shall be designed and built in conformance with the current City of Los Angeles Uniform Building Code at the time of the building permit. Information about ground motion parameters included in the site specific geotechnical report shall be used as input for seismic design of the proposed Project.

Significant Project Impacts After Mitigation

Based on City standards of acceptable risk reflected in the City of Los Angeles Building Code and the performance review procedures of the Bureau of Engineering and Building and Safety, no significant geology impacts would occur as a result of the proposed Project after mitigation of potential ground shaking impacts.

Cumulative Impacts

Projects included under the related projects list would require municipal government approvals of design, and the implementation of mitigation measures, where needed. Significant cumulative grading and geotechnical impacts resulting from the potentially concurrent construction of the related projects are not anticipated. The proposed Project and related projects would be subject to potentially severe ground motion during a severe earthquake. Based on Project development which would be constructed to adhere to the building codes and other locally imposed plans, cumulative seismic impacts would be reduced to less than significant levels. Related projects would not be exposed to a greater than normal seismic risk than other areas in Southern California. The Project would not in any way compound the effects of the related projects. Therefore, cumulative geology, soils, and seismic impacts would not be considered significant.

HAZARDOUS MATERIALS

Project Impacts

Hazardous Materials

Operation of the existing facilities does not include the use of significant quantities of hazardous materials. Several products that are used and stored in small quantities for general maintenance purposes on-site could be hazardous if mishandled or spilled. Materials used for general maintenance include: hydraulic fluid, Nalco 2536 (a rust inhibitor for hot water treatment), window washer solution, turbine oil, air compressor fluid, Enzyme 80 (drain cleaner), large spill kit containers and automobile batteries. Implementation of the proposed Project would not impact hazardous materials currently used on-site. Furthermore, the proposed Project would not involve the use of significant quantities of hazardous materials that could result in a reasonably foreseeable upset or accident. Therefore, the proposed Project would not have the potential to create a significant hazard to the public or environment as a result of operational activities of the Project. As with the existing uses, operation of the proposed Project would continue to involve the use, disposal and transport of small quantities of hazardous materials from routine maintenance of various types of equipment and facilities currently on-site. The existing facilities handle these materials in an acceptable manner that does not create a hazard to the public or the environment through the use of legal disposal procedures. The proposed Project would not result in a significant hazard to the public or environment through the routine use and handling of hazardous materials provided that proper handling procedures are followed.

Asbestos Containing Materials

The existing structures to be removed are known to have asbestos containing materials (ACMs). ACMs are being removed from the existing structures as a part of the on-going asbestos abatement program for the site. Demolition without first removing friable or potentially friable ACMs could result in the uncontrolled release of asbestos into the air. This would constitute a potentially significant impact to on-site employees and visitors, as well as adjacent employees and residents. However, the process of asbestos and hazardous materials removal, waste packing and disposal meets all applicable federal, state and local statutes and regulations, including the South Coast Air Quality Management District Rule 1403. Rule 1403 includes a comprehensive list of asbestos removal procedures governing the removal, containment, transportation and disposal of ACMs in a manner that prevents their release into the environment. The applicable codes and procedures are extensive and listed in **Appendix 5**.

Pursuant to strict controls, the asbestos containing material, after removal, is sealed and transported into heavy duty bags in the containment area and loaded into lockable, metal dumpsters that are then loaded onto trucks that transport the material to a permitted disposal facility.

During the abatement process, air monitoring will be carried out by an Environmental Consultant on behalf of the Owner to verify that the building air, both within and outside the containment area and outside containment in the environment, remains uncontaminated. In the case of an accidental spill, at a minimum, all affected areas are decontaminated by wet cleaning and HEPA vacuuming. Where necessary, the affected area(s) is/are isolated by the construction of critical barriers. If decontamination of each contained work area is incomplete, the area is then re-cleaned and retested until the clearance criteria are met.

Therefore, local air currents would not carry ACMs over surrounding uses including Century Park East Condominiums, Park Place Condominiums, Century City Hospital, Century Plaza Hotel, the St. Regis Hotel or locations along the haul route. In addition, all demolition and on-going asbestos abatement and activity would be conducted in full compliance with all other Rule 1403 requirements related to notification, waste disposal and training. The requirements of Rule 1403 and all other applicable regulations alleviate potential health risks as a result of the ACM removal process. As a

result of the on-going asbestos abatement program and the identified mitigation measure (HHM-1), removal of asbestos containing materials and related health impacts would be considered less than significant.

Methane

Methane concentrations are generally insignificant and not substantially elevated above background concentrations. However, elevated concentrations of methane have been detected in localized areas of the lowest level of the garage (Level F), and below the concrete slab floor of that level. Commencement of demolition and/or construction activities without proper mitigation could result in a potentially significant impact. However, implementation of mitigation measures HHM-3 through HHM-9 would reduce the potential impact to a less than significant level.

Mitigation Measures

The following mitigation measures would reduce potential impacts to a less than significant level:

- HHM-1** Prior to issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant stating that all asbestos containing materials (ACM) present in the building has been abated in compliance with South Coast Air Quality Management District's Rule 1403 as well as all other applicable local, state, and federal rules and regulations.
- HHM-2** Hazardous materials generated, as a result of routine maintenance of equipment shall be disposed of in accordance with legal disposal procedures.
- HHM-3** All contractors and construction companies shall be advised of the potential risk associated with subsurface methane in soil gas below the Project site by the applicant. Although soil gas monitoring did not indicate that hydrogen sulfide is a potential problem at the Project, this gas can be associated with methane gas and should be monitored during construction operations as a potential health threat and an odor concern.
- HHM-4** The contractors and construction companies shall develop a Health and Safety Plan that addresses combustible gas and hydrogen sulfide concerns and procedures they intend to institute to minimize potential danger from explosion or exposure in the event elevated concentrations are encountered. The Plan shall comply with all applicable environmental health and safety laws and indicate, at minimum, the following:
- Precautions that will be taken to arrest any spark generation or ignition sources during construction procedures that penetrate the concrete floor.
 - Monitoring equipment and specifications should be included for continuous monitoring of methane concentrations and comparison to levels of concern such as Permissible Exposure Levels (PELs), Threshold Limit Values (TLVs), or concentrations Immediately Dangerous to Life and Health (IDLH) in the breathing zone. In addition, methane concentrations should be regularly monitored and compared against the Lower Explosive Level (LEL). Contingency responses should be established for each scenario.
 - Specifications should be included for use of the garage ventilation system, and any additional systems, to assure maximum air exchanges, as necessary, within the facility during construction operations.
- HHM-5** The cracks in the floor and seams that open below the concrete floor shall be sealed that open below the concrete floor shall be sealed if deemed necessary by the Department of Building and Safety to minimize gas migration into the garage.
- HHM-6** The operation of the ventilation system shall be modified, if necessary, to avoid the development of negative pressures within the building during power outages.

- HHM-7** Floor sections on Level F around new pilings shall be sealed at the completion of construction to prevent gas migration into the garage from the sub-surface.
- HHM-8** All cross connections between the Level F sub-drain piping and other systems (i.e. the storm drain and ventilation systems) shall be identified and eliminated.
- HHM-9** Prior to issuance of a building permit, the building shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. The owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.

Significant Project Impacts After Mitigation

Compliance with SCAQMD Rule 1403 requirements would reduce impacts related to the removal of ACMs from on-site buildings to the extent required by existing regulations. Required compliance and the on-going asbestos abatement program for the site would assure a less than significant ACM impact. With implementation of the recommended mitigation measures, the proposed Project would not result in a significant adverse impact with respect to methane hazards and/or hazardous materials.

Cumulative Impacts

Asbestos may be present in buildings targeted for demolition in conjunction with the related project list. Unless ACMs are removed prior to demolition, potentially significant cumulative health hazards related to the accidental release of asbestos could occur. However, as with the proposed Project, all demolition activity associated with the related projects is assumed to be conducted in full compliance with the requirements of SCAQMD Rule 1403. Consequently, the potential for an accidental release would be minimal and cumulative impacts would be considered less than significant. Projects included under the related project list also have the potential to contain elevated levels of methane. With the presence of methane, the related projects would generate a potentially significant cumulative risk. However, it is assumed that all demolition and construction activity associated with the related projects would be conducted in the same manner as the proposed Project. Therefore, the potential for an accidental release would be considered less than significant with respect to cumulative impacts.

HYDROLOGY

Surface Water Runoff

The proposed Project would not increase the volume of flow in excess of current site conditions, nor would it result in a permanent change in the direction of flow from the site. The existing storm drain infrastructure was designed to provide for the peak flow rate from the existing condition of the Project site. Mandatory compliance with City, County and State regulatory requirements would further ensure that any potential runoff effects that could occur from development would be rigorously controlled. The Project would not be subject to a known flood hazard, nor would it create a new flood hazard through impedance of surface water runoff.

Water Quality

The Project would be designed to comply with all applicable construction and operational water quality standards and waste discharge requirements. The proposed Project would be required to file a stormwater plan with the City of Los Angeles for grading activities during the construction phase. It is anticipated that the existing NPDES permit and/or its requirements would remain in effect throughout the Project with the possibility of a temporary permit for the construction phase. Environmental impacts to water quality could result from the release of toxins into the stormwater drainage channels during the routine operation of commercial uses, including restaurants. However, the potential impacts would be mitigated to a less than significant level by incorporating stormwater pollution control measures. With conformance to a stormwater plan, an NPDES permit, and

mitigation measures H-1 through H-14, the proposed Project would result in a less than significant impact with regard to water quality.

Mitigation Measures

The following mitigation measures would reduce potential water quality impacts to a less than significant level:

- H-1** The Project shall comply with the requirements of the NPDES permit for stormwater discharge and with guidelines and policies of the Regional Water Quality Control Board, EPA and local agencies regarding water quality.
- H-2** The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
- H-3** Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- H-4** Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- H-5** Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.
- H-6** Reduce and recycle waste, including oil and grease, to the extent feasible.
- H-7** Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.
- H-8** All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
- H-9** The legibility of signs and stencils discouraging illegal dumping must be maintained.
- H-10** Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.
- H-11** Storage areas must be paved and sufficiently impervious to contain leaks and spills.
- H-12** Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.
- H-13** The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.
- H-14** Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the

Planning Department's public counter or from the City's website at www.lastormwater.org.

Significant Project Impacts After Mitigation

No significant adverse impacts are anticipated to occur through implementation of the proposed Project with mitigation. Existing storm drain facilities are adequate to serve the proposed Project and no impacts on water quality are expected after mitigation.

Cumulative Impacts

No significant cumulative impacts on the stormwater drainage system, hydrology or water quality are anticipated from implementation of this and other projects included under the related project list. The related projects would result in increased runoff to the County storm drain system as a whole. However, there are no known capacity problems in the storm drain system that flows from the project vicinity to its eventual destination in Ballona Creek. In addition, individual projects are required to develop and implement storm drain mitigation, including compliance with NPDES permit guidelines, where appropriate. With anticipated mitigation, no cumulative storm drain, hydrology or water quality impacts are anticipated.

LAND USE

Project Impacts

Consistency with Land Use Patterns

The proposed Project site is situated on the eastern portion of the central core area of Century City. All properties within the core area are consistent with the area's C2-2-O zoning. The proposed mixed-use commercial office Project is consistent with the area's existing land use. The proposed Project would not result in a substantial change in use of the subject property.

Compatibility with Adjacent Uses

The proposed commercial uses would be consistent with hotel, office, restaurant and hospital land uses located to the north, east and west of the subject property. While hotel and hospital uses are more sensitive to land use incompatibilities resulting from certain impacts (such as noise, or odors) than other commercial uses, the temporary occupancy of hotels and hospitals results in a reduced sensitivity when compared to permanent occupants within a residential development. Regardless, this document does consider the impacts resulting from the Project within each of the environmental issue discussions of Section V. This analysis shows that the physical characteristics or associated activities would not prevent or substantially impair the functionality of nearby hotel and hospital uses. Residential units may be considered incompatible if located directly adjacent to the retail uses proposed. However, the residential uses in this instance are separated from the Project by Olympic Boulevard which is six lanes wide in the area of the subject property.

The Century City North Specific Plan requires that all projects within the Specific Plan area must avoid casting a shadow for more than two hours, between the hours of 8 am and 8 pm, on any detached single-family residential structure. (See Section V.A, Aesthetics for a discussion of Project related shadow impacts.) The proposed Project would cast shadows longer than the existing buildings. However, winter and summer solstice shadows from the Project would be completely confined to the interior commercial areas of the CCNSP area, and would not cast a shadow on any single family residential buildings.

Consistency of the Proposed Development with Zoning, and Land Use Plans and Policy

All of the proposed uses are allowable uses and would not conflict with the C2-2-O zoning designation. The C2-2-O zoning designation is within Height District No. 2, which allows for a 6:1

FAR. The subject property covers 610,834 square feet (14.023 acres) of land area. With Project buildout development would total 3,167,463 square feet of floor area on the subject property, for an FAR of 5.2:1. Therefore the proposed FAR would be less than allowed by the zoning.

The total code required parking spaces for the proposed Project is 6,065 spaces and includes parking space reductions pursuant to Los Angeles Municipal Code Sections 12.21-A 4(c) and 12.24-Y. As discussed in Section V.M, the Project would provide all code required parking on-site including: 45 parking spaces at grade, 172 spaces on parking level A, 597 spaces on level B, 1,222 spaces on level C, 1,233 spaces on level D, 1,229 spaces on level E and 1,264 spaces on level F.

The Project requires the approval of a Major Development Project Conditional Use Permit by the City of Los Angeles because it involves the net addition of more than 100,000 square feet of floor area. In addition, because the Project is located within the boundaries of a Specific Plan area, it will also undergo Project Permit Compliance Review to determine whether the Project complies with the applicable regulations of the Specific Plan. This review is a separate entitlement process and approval, and is not the same as a "Project Permit" approval under the Century City North Specific Plan (CCNSP). A "Project Permit" under the CCNSP is required if a development is defined as a "project" under the Specific Plan. The CCNSP defines a "project" as any building to be constructed in a lot within the Specific Plan area, excluding any construction or renovation activity which does not add to the Cumulative Automobile Trip Generation Potential (CATGP) Trips. Because the proposed development does not generate additional CATGP Trips, it is not a "project" under the CCNSP, and therefore, does not require a "Project Permit."

All undeveloped and underdeveloped parcels within the CCNSP were allotted a certain number of CATGP trips in one or both of two specific plan phases. Development under the CCNSP is governed and capped by the CATGP trips allocated to each parcel, along with other CCNSP requirements. Development is allowed within these commercially zoned areas when it does not contribute to a number of trips in excess of the existing use, or the amount allocated to the subject property if it is undeveloped or underdeveloped. Development may also occur if trips are transferred to the subject property in accordance with the CCNSP, or generated through a change in the existing use or demolition of existing buildings. For the Project site, no additional CATGP trips have been allocated beyond those associated with the existing uses.

The Project would be consistent with the West Los Angeles Community Plan as well as the Century City North Specific Plan. Existing uses at the Project site generate 19,161 daily trips according to the CCNSP. The proposed Project would generate 12,450 daily trips, or 6,711 fewer trips, compared to the existing uses. The remaining trips would be considered Replacement Trips, for they are responsible for a portion of the baseline condition. Therefore, the proposed Project would be consistent with Section 3A of the CCNSP. The proposed Project would also be consistent with applicable policies contained in the Southern California Association of Governments Regional Comprehensive Plan and Guide and Regional Transportation Plan.

Mitigation Measures

The proposed Project would not result in significant land use compatibility or land use plan consistency impacts, and, therefore, mitigation measures are not required.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant land use compatibility or land use plan consistency impacts. Therefore, it would not result in significant unavoidable impacts.

Cumulative Impacts

Included in the development attributable to past, present and probable future projects would be some development related to the unutilized Replacement Trips associated with the existing buildings that would be available for use in the Century City North Specific Plan (CCNSP) area. It would be speculative to try to determine what projects might be engendered from these trips. The Replacement Trips (Trips) may be utilized at one or more sites in the plan area through the transfer procedures set forth in the CCNSP. All of these Trips are within the anticipated development projections of the CCNSP. As such, they were planned for, and development associated with these Trips is a part of the local land use projections of the City of Los Angeles and part of the existing baseline. It should be noted, that the potential use of these trips is very limited. They must be used within the CCNSP area, and cannot be used in other jurisdictions or in other parts of Los Angeles. Further, any development utilizing these trips would, like the Project, be subject to the City of Los Angeles environmental review procedures, and appropriately analyzed and addressed under CEQA. No cumulatively considerable impact is anticipated as a result of the Project when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects, including development that may occur as a result of the Replacement Trips.

As discussed above, the proposed Project is compatible with existing uses immediately surrounding the site. Moreover, the Project would remain compatible with other known proposed development in the area, such as the Constellation Place project and the Westfield Shoppingtown Century City Expansion. The proposed 2000 Avenue of the Stars Project is consistent with and complementary to the introduction of office uses at the Constellation Place and Westfield Shoppingtown Century City sites. Therefore, cumulative land use impacts are less than significant.

NOISE

Project Impacts

Construction Phase Impacts

Off-Site Impacts

Construction noise represents a short-term impact on ambient noise levels. Noise generated by construction equipment, including trucks, graders, bulldozers, concrete mixers and portable generators can reach high levels. For the proposed Project, the highest noise generating activities would include demolition of the existing buildings.

The nearest noise sensitive use that may be affected by construction and demolition noise is the Century Plaza Hotel located across from the Project on Avenue of the Stars. The near edge of the hotel property is located approximately 160 feet from the nearest demolition activities. Noise generated by demolition activities could reach as high as 85 dBA with typical maximum noise levels of approximately 72 dBA, as recorded at the outdoor area nearest the property boundary. Average outdoor noise levels during demolition would likely be approximately 67 dBA. The mid-rise structure of the hotel containing the guestrooms is located approximately 270 feet from the nearest demolition activities. Interior noise levels in the guestrooms could reach as high as 60 dBA with typical maximum noise levels of 47 dBA. Average interior demolition noise levels would likely be approximately 42 dBA. All other non-residential noise sensitive uses including the St. Regis Hotel and the Century City Hospital are located a greater distance from the construction area than the Century Plaza Hotel and would be less affected.

Other noise sensitive uses include the Park Place Condominium complex, located across Olympic Boulevard from the Project. The near edge of this area is located approximately 215 feet from the nearest demolition activities. Noise generated by demolition activities could reach as high as 84 dBA with typical maximum noise levels of approximately 71 dBA, as recorded at the outdoor area nearest the property boundary. Average outdoor noise levels during demolition would likely be

approximately 66 dBA. The Park Place Condominium buildings are located approximately 290 feet from the nearest demolition activities. Interior noise levels could reach as high as 60 dBA with typical maximum noise levels of 47 dBA. Average interior demolition noise levels would likely be approximately 42 dBA. All other residential areas, such as the Century Park East Condominiums, are located greater distances away from the construction areas than the Park Place Condominiums and would be less affected.

Construction and demolition activities would generate increased noise levels at the multi-family residential and hotel uses adjacent to the Project. This is a potentially significant impact. Construction hours would be limited by the City of Los Angeles Municipal Ordinance which designates the hours of the day during which construction activities are appropriate. Section 41.40 Chapter IV (Public Welfare) of the City of Los Angeles Municipal Code prohibits noise generating construction activities that may disturb nearby hotel occupants or residents before 7:00 a.m. or after 9:00 p.m. Monday through Friday. All construction activity within 500 feet of residences or hotels is restricted before 8:00 a.m. or after 6:00 p.m. on Saturday or any national holiday, and at anytime on Sunday. The Planning Department further restricts construction to no later than 6:00 p.m. Monday through Friday. Construction and demolition activities for the Project shall only occur during the hours not prohibited. Therefore, construction and demolition activities would not impact people during normal sleep times. These restrictions are included as mitigation measure N-1. The Project would also be required to comply with mitigation measures N-2 to N-6 which, would reduce temporary noise impacts. However, the construction noise impact would continue to be potentially significant.

Construction Vehicle Impacts

Trucks used to haul debris from the Project site during demolition would increase traffic noise levels along the proposed haul route. The Project's haul route is not approved and is subject to the City's approval process. This process includes a public hearing and opportunities for the public to comment on the proposed route. For purposes of this analysis, this document assumes the route to be as follows. Trucks would approach the Project site from the Santa Monica (I-10) Freeway exiting onto Overland Boulevard, turning right onto Pico and then left onto Avenue of the Stars. Leaving the Project site, the trucks would continue north on Avenue of the Stars, turn right onto Constellation, right onto Century Park East, right onto Pico Boulevard and left onto Overland Boulevard to the Santa Monica Freeway. Up to 41 truck round trips per day would be required to haul debris away from the site. This would result in 82 additional trucks on the haul route roads.

The greatest increase in construction traffic noise would occur along the roadway segment with the lowest existing traffic volume and currently generating the lowest levels of noise. Based on information received from Crain and Associates, the roadway segment with the lowest existing traffic volume is Century Park East north of Pico Boulevard. This roadway has an existing average daily traffic volume of 14,200 trips and a posted speed of 35 miles per hour. The additional trucks on this roadway would result in a 0.3 dB increase in the traffic noise CNEL levels along the roadway segment. This increase is not significant. Increases along all other roadway segments on the haul route would be less than 0.3 dB. Therefore, construction vehicles utilized for the Project would not result in a significant noise impact.

Operational Impacts to Off-Site Uses

The proposed Project generates less traffic than the existing uses currently on the Project site. Therefore, the Project will result in a slight decrease in traffic noise levels on roadways in the vicinity of the Project when compared to future without Project levels.

There are no on-site activities proposed that would be expected to generate significant levels of noise. The nearest noise sensitive uses are located across major roadways. The Century Plaza Hotel is located across Avenue of the Stars and the Park Place Condominiums and Century Park East

Condominiums are located across Olympic Boulevard. Noise levels generated by typical activities on a project of this type are not expected to be significantly greater than the noise generated by the roadways. In any case, noise generated by any activity on the Project site would need to comply with the City's Noise Ordinance (Municipal Code Chapter XI). By complying with the Noise Ordinance, the Project would not result in a significant noise impact due to on-site activities.

The Project does provide a helipad on the roof of the proposed building for emergency use. No commercial use would be permitted. Noise impacts from emergency helicopters would be adverse but not significant due to restriction of helipad operations to emergency situations.

Operational Impacts to On-Site Uses

Exterior traffic noise levels at the building face would be approximately 64.0 CNEL along Constellation Boulevard, 64.0 CNEL along Avenue of the Stars, and 64.0 CNEL along Olympic Boulevard. Commercial buildings achieve at least 20 dBA of outdoor to indoor noise reduction with windows closed. Interior traffic noise levels for the Project would be less than 45 CNEL and therefore, fall below the interior noise criteria applicable to the proposed Project. The Project occupants would not be significantly affected by traffic noise.

Mitigation Measures

Implementation of the following mitigation measures would reduce potential impacts but the project could still result in a potentially significant impact.

- N-1 All exterior construction and demolition activities located within 500 feet of a residence or hotel shall occur between 7:00 am and 6:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday, pursuant to the City of Los Angeles Municipal Code Section 41.40.
- N-2 Construction equipment shall use noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise. Construction operations shall be staged as far from sensitive uses as feasible.
- N-3 Maintain all sound reducing devices and restrictions throughout the construction period.
- N-4 Locate any delivery, truck loading or trash pickup areas as far from noise sensitive land uses as possible to the extent feasible.
- N-5 The project shall comply with the City of Los Angeles Municipal Code Chapter XI, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- N-6 The project sponsor must comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.

Significant Project Impacts After Mitigation

With implementation of the proposed mitigation measures, the Project could still result in a potentially significant construction impact, however the Project would not result in a significant operational impact.

Cumulative Impacts

The Environmental Setting Section (Section IV) provides a list of projects that are planned or are under construction in the Project area. Most of the development planned for the area is within the intensely developed portions of West Los Angeles, Century City, and Beverly Hills. In close proximity to the site are the Constellation Place, Fox Studio expansion, the Santa Monica Boulevard Transit Parkway and the Westfield Shoppingtown Century City projects. Other related projects to be constructed in the area of the proposed Project would be subject to a CEQA analysis, and likely include mitigation measures to

reduce construction noise impacts. However, the increase in construction noise for the proposed Project and the potential for increased construction noise from related projects, could result in a potentially significant cumulative construction noise impact.

The proposed Project would result in a reduction in the amount of noise associated with the operation of the Project. Therefore, the Project would not contribute to cumulative operational noise impacts in the area.

POPULATION AND HOUSING

Project Impacts

Population Growth

The proposed Project would remove the existing commercial uses and redevelop the site with a mix of office, retail, restaurant and cultural uses. The proposed Project would not remove or provide any form of housing and would not be considered a population generating use. Therefore, the proposed Project would not result in a significant impact with respect to consistency with local and regional planning projections regarding population and housing growth.

The proposed Project construction and operation would generate new jobs at the Project site. The number of net new jobs created is estimated at 501. SCAG projects employment in the year 2010 for the region to be 1,931,000 an increase of 148,847 jobs as compared to the year 2000 employment level off 1,782,153. The number of net new jobs created would be within SCAG's regional growth projections for the Los Angeles subregion. Therefore, the proposed Project would not result in a significant impact with respect to consistency with local and regional planning projections regarding employment growth.

Consistency with Population Growth and Housing Policy

The proposed Project would not conflict with or hinder the attainment of regional and local policy regarding population growth, housing and employment. See Section V.H, Land Use, for a discussion of the Project's consistency with other applicable SCAG policies. The Project would not result in the displacement of any form of housing.

Mitigation Measures

The proposed Project would not result in a significant adverse impact with respect to population or employment growth or housing supply and therefore mitigation measures are not required.

Significant Project Impacts After Mitigation

The proposed Project would not result in a significant adverse impact with respect to population and housing or employment growth, housing supply, affordability, or displacement or applicable policy.

Cumulative Impacts

Section IV provides a list of projects that are planned or under construction in the Project area. Although most of the 42 projects will develop commercial office or retail space, 14 residential projects will add a total of 776 units in the area. Based on a multiplier of 2.07 persons per dwelling unit, the population of the West Los Angeles area would increase by approximately 1,606. The population increase attributable to the proposed Project (0 people) plus related projects would remain well within the projected 2000-2010 population increase for SCAG's Los Angeles subregion of 387,791 people and the West Los Angeles Community Plan Area of 15,270 people. The proposed Project would also create a number of jobs in the West Los Angeles area that would support the growing population of the West Los Angeles region. The increase in the number of jobs as a result of the Project is anticipated to be within SCAG's employment projection. Therefore, cumulative impacts would not be significant.

Related projects would also need to be assessed for consistency with population and housing goals and policies, as well as for housing displacement impacts. Since the Project does not cause impacts with regard to these particular issues, it would not contribute to any cumulative impact.

PUBLIC SERVICES

1. Fire Protection

Project Impacts

The adequacy of fire protection services for the proposed Project is based on required fire flow, response distance from existing fire stations, equipment access, and the Fire Department's judgment regarding needs and service in the area. Currently, adequate water pressure is available to serve new development in the Project vicinity. The LAFD requires that all projects either: 1) be located within 1.5 miles of the nearest fire station, or 2) if this distance cannot be achieved, include an interior sprinkler system in the Project as a means of fire protection. Fire Station No. 92 is located within 1.3 miles of the Project site. This station maintains a full staff and would be able to serve as the first station to provide full truck and engine company service to the site. The proposed Project could be adequately served by the existing facilities, equipment and staff, and would therefore not generate a significant impact on fire services. The Project traffic analysis demonstrates that Project impacts to vehicular traffic would be less than significant after mitigation. Thus, the Project would not significantly impact response times. Regardless, the Project would install an automatic fire sprinkler system and two electric/emergency driven fire pumps with a combined capacity of 1,250 gallons per minute. Water to the pump would be supplied from a new on-site 75,000 gallon storage tank located on garage level F.

With regard to access to the Project site, the proposed Project would maintain adequate access for the LAFD. The Project site plan conforms to access requirements of the Los Angeles Municipal Code. Compliance will be confirmed by the LAFD during plot plan review, prior to construction. Therefore, the proposed Project would not result in a significant impact on fire department access to the proposed site or adjacent properties.

Mitigation Measures

Although Project impacts would be less than significant, the following are included as mitigation measures in order to disclose and make clear the City's requirements.

The following recommendations of the Fire Department relative to fire safety shall be incorporated, unless otherwise approved, into the building plans where feasible. This condition shall not require existing development on the site to comply with these provisions.

- FP-1** Project building plans shall include the submittal of a plot plan for approval by the Fire Department either prior to the recordation of the final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; and all structures must be within 300 feet of an approved fire hydrant.
- FP-2** The applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features appropriate to the design of the Project.
- FP-3** Construction of new public or private roadway in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.
- FP-4** The Project shall utilize standard cut-corners on all turns, if applicable.
- FP-5** Fire Department access shall remain clear and unobstructed during demolition.
- FP-6** If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area.
- FP-7** No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

- FP-8** If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway.
- FP-9** No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway, of an improved street, access road, or designated fire lane, unless otherwise approved.
- FP-10** Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
- FP-11** Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot unless otherwise approved.
- FP-12** The Project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

Significant Project Impacts After Mitigation

No significant Project impacts would remain after the implementation of the identified mitigation measures.

Cumulative Impacts

The proposed Project site is currently developed with uses that require similar LAFD resources as the proposed Project. Future development has the potential to increase the population and density of the area and could potentially have a cumulative impact on fire protection services. However, any cumulative development would be subject to fire protection and safety measures, as with the proposed Project, to adequately mitigate fire protection impacts. The related projects would be required to comply with all Fire Department development review criteria. The proposed Project has a less than significant impact and would not substantially contribute to cumulative impacts.

2. Police Protection

Project Impacts

Development of the proposed Project would not generate additional residents, or pedestrians, and would reduce vehicular traffic in the Project area. Therefore, it is unlikely that the Project would result in a substantial increase in demands for law enforcement and protection services provided by the LAPD. The existing on-site Shubert Theater, Lowe's Cineplex, and nightclubs are primarily nighttime driven activities drawing visitors from the surrounding region. These would be removed, and replaced predominantly with office space. The resulting use would primarily be a daytime (8 a.m. to 6 p.m.) activity. The LAPD in response to the Notice of Preparation (NOP) issued for the Project, has indicated that a project of this size would have a significant impact on police services. The Project traffic analysis demonstrates that Project impacts to vehicular traffic would be less than significant with mitigation. Thus, the Project would not significantly impact response times. Additionally, tax revenue generated by the proposed Project would add funding to City of Los Angeles for distribution to City Departments, including the LAPD. Project compliance with City requirements, Project design features (such as closed circuit monitoring and private security), and implementation of mitigation measures PS-1 to PS-3 would result in a less than significant impact to police services.

The current security program is continually recognized as one of the best in the City of Los Angeles. The necessary security levels for the new development and the entire Project site would be maintained to ensure a safe site. The planned development would also benefit from implementation of some of the latest technology in security hardware and electronics.

Mitigation Measures

The following mitigation measures would reduce potential impacts to police services to a less than significant level:

- PS-1** The applicant shall consult with the Los Angeles Police Department Crime Prevention Unit on crime prevention features appropriate to the design of the Project.
- PS-2** Entryways, elevators, lobbies, and parking areas shall be well illuminated and designed with a minimum of visual dead space to eliminate areas of concealment.
- PS-3** Upon completion of the Project, the owner shall provide the West Los Angeles Area Commanding Officer with a diagram of each portion of the property, including access routes and additional information that might facilitate police response.

Significant Impacts After Mitigation

No significant adverse impacts are anticipated to occur through implementation of the proposed Project with mitigation.

Cumulative Impacts

Future development has the potential to increase the population and density of the area and could potentially have a cumulative impact on police protection services. However, any cumulative development would be subject to police protection and safety measures, as with the proposed Project, to adequately mitigate police service impacts. The related projects would be required to comply with all Police Department development review criteria. The proposed Project has a less than significant impact after mitigation and would not substantially contribute to cumulative impacts.

3. Schools**Project Impacts**

Student generation can be estimated from indirect sources. The Los Angeles Unified School District (LAUSD) provides open enrollment at some schools, allowing students to attend schools other than their local school. Open enrollment is typically available at schools that are not otherwise operating to capacity. Because of this, parents have the option of enrolling children at schools in close proximity to their place of employment rather than the school that serves their residential location. As a result, the proposed Project could result in some indirect student generation from new employees working within the new Project building who enroll their children in schools within the service area, but who otherwise do not live in the area. The proposed Project would result in a net increase of 100,125 square feet of commercial floor area, which would result in approximately 3 elementary, 3 middle school, and 3 high school students. The addition of the proposed Project's nine students would be adequately accommodated by the existing capacity at the local schools. Therefore, the proposed Project would not result in a significant impact on local school capacity.

Mitigation Measures

As described above, the proposed Project would not result in a significant impact on public schools. Mitigation measures are not required or recommended.

Significant Project Impacts after Mitigation

The proposed Project would not result in a significant adverse impact on schools.

Cumulative Impacts

Based on this analysis, student generation from the proposed Project in combination with other planned development would not result in a significant cumulative impact on LAUSD schools serving

the Project area. In addition, through the City's environmental review procedures, each new development is required to pay school impact fees in order to offset the additional demand for school capacity and services generated by the development. Payment of these fees would reduce cumulative impacts on these schools.

4. Libraries

Project Impacts

According to the City of Los Angeles Draft CEQA Thresholds Guide (City of Los Angeles, May 14, 1998, page J.5-1), projects that add fewer than 75 homes would not normally result in a significant impact on library services. The CEQA Thresholds Guide does not specify a threshold for commercial/office development.

The proposed Project consists of no new residential apartment units and a net increase of 100,125 square feet of development over existing uses. The Project's office space would contribute to the daytime employment level in the area, which could create some additional demand for local library service. However, this demand would be met by the existing and soon to be constructed facilities. Thus, Project impacts to library services would be less than significant.

Mitigation Measures

As described above, the proposed Project would not result in a significant impact on library services. Mitigation measures are not required or recommended.

Significant Project Impacts after Mitigation

The proposed Project would not result in a significant adverse impact on libraries.

Cumulative Impacts

General growth and specific development proposals in the Project area are expected to contribute to a cumulative increase in the demand for library facilities and services. Most of the development planned for the area is commercial, providing additional square footage of office and retail space. The related projects list identifies some residential projects that would develop a total of 776 residential units (apartments, condominiums, and senior housing). Also, daytime population would be added by commercial related projects. However, the existing and under-construction libraries would be designed to accommodate a population up to 259,000 people. The Project's contribution to cumulative library impacts would be less than significant.

RECREATION AND PARKS

Project Impacts

The proposed Project does not include any residential uses, which would require the construction of new recreational facilities. As the Project would not increase the resident population, no adverse impacts are anticipated. The removal of the eight privately-owned tennis courts would result in some members and/or private lessees seeking court reservations elsewhere. The two nearest public court facilities, located at Cheviot Hills and the Westwood Recreational Center, provide 22 tennis courts. Given the underutilization of the existing facility, and number of nearby tennis courts, and/or recreational opportunities, Project implementation would not result in a substantial deterioration of another existing recreational facility due to increased usage from displaced tennis players.

While the City of Los Angeles' Draft CEQA Thresholds Guide does not specifically mention theaters and cinemas as passive recreational facilities, they do provide opportunities for passive recreation. The Shubert Theatre is one of many theater venues in Los Angeles. The site is in close proximity to Hollywood and other theater venues in the Los Angeles area. Other large theaters in the area include

the Pantages Theater, Kodak Theater, Dorothy Chandler Pavilion, and the Ahmanson Theater. The Shubert Theater is currently underutilized. Due to underutilization of the theater and the number of similar venues in the area, removal of the theater would not result in an adverse impact on recreational facilities.

The Loews Theatres Century Plaza Cinemas are one of the many cinema venues on the west-side of Los Angeles. They have experienced direct competition with the AMC Century 14 facility located in the Century City shopping mall to the northwest. Additionally, three other movie facilities are located within 1.3 miles of the subject property. The loss of cinemas is not anticipated to generate an adverse impact to recreational facilities due to the number of movie screens available in the vicinity.

Mitigation Measures

Based on stated thresholds of significance, no significant impacts to recreational opportunities or facilities would occur. Therefore, no mitigation measures are required or recommended.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

General growth and specific development proposals in the area would contribute to a cumulative increase in the demand for recreational facilities. The Environmental Setting Section (Section IV) provides a list of projects that are planned or are under construction in the project area. Most of the development planned for the area is commercial, providing additional square footage of office and retail space. This list identifies some residential projects that would develop a total of 776 residential units (apartments, condominiums, and senior housing).

An increase in the population within the Project area would result in a proportional increase in the demand for recreational facilities. This would marginally affect the existing public recreational facilities in the area. However, through the City's Quimby Act and environmental review procedures, each new development is required to provide recreational land or facilities, pay in-lieu park fees, or otherwise mitigate their potential impacts. Therefore cumulative impacts are less than significant.

TRANSPORTATION/ TRAFFIC

Project Impacts

Project Traffic Generation

The vehicular trip generation of projects in the Century City area is typically analyzed according to three methodologies. These methodologies and the associated trip generation rates are contained or referenced in the Century City North Specific Plan (CCNSP), West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP), and LADOT Traffic Study Policies and Procedures manual. In addition, LADOT has required a fourth methodology that incorporates adjustments for internal capture of trips. This revised methodology provides a more conservative analysis.

Project traffic projections were calculated according to the CCNSP generation rates. Utilizing this methodology, the proposed Project would generate 12,450 daily trips while the current development on the Project site generates 19,161 daily trips. The proposed Project would result in a net decrease of 6,711 daily Trips.

Projections of the amount of project traffic expected to be generated were also calculated according to the WLA TIMP. The proposed Project would generate 1,418 PM trips. Additionally, the proposed Project's traffic generation was compared to the amount of traffic being generated by the current

development on the Project site (3,355 PM trips). Therefore, the proposed Project would result in a net decrease of 1,937 PM trips.

Trips generated by the proposed Project were also analyzed according to standard LADOT Methodology. Utilizing this approach, the Project would generate 11,253 daily trips, 1,135 AM peak hour trips and 1,418 PM peak hour trips. When compared to the existing trip generation (31,823 daily trips, 1,723 AM peak hour, and 3,355 PM peak hour), the proposed Project results in a net decrease of 20,570 daily trips, 588 AM peak hour trips and 1,937 PM peak hour trips.

Utilizing the Revised LADOT Methodology, the proposed Project would generate 9,076 daily trips, 1,043 AM peak hour trips and 1,161 PM peak hour trips. The existing uses of the site would be removed in order to allow for development of the proposed Project. When compared to the existing trip generation (20,433 daily trips, 1,123 AM peak hour, and 2,060 PM peak hour), the proposed Project results in a net decrease of 11,357 daily trips, 80 AM peak hour trips and 899 PM peak hour trips.

Analysis of Future Traffic Conditions (With and Without Project)

Utilizing the revised methodology data, the analysis of future traffic conditions at 38 study intersections was performed using Critical Movement Analysis (CMA) procedures to determine operating characteristics in terms of the Level of Service (LOS) provided. Level of Service describes the quality of traffic flow.

A review of the expected future traffic conditions at the study intersections indicates that prior to the Project (2005 Without Project), 20 study intersections would be operating at LOS E or F. Eighteen of these intersections would be at LOS E or F in both peak hours.

Based on the revised methodology the Project may have a potentially significant impact at one study intersection, Santa Monica Boulevard (North) at Avenue of the Stars, in the AM peak hour. This impact can be mitigated to a less than significant level through implementation of mitigation measure T-1. Mitigation measure T-1 requires the applicant to implement a Transportation Demand Management (TDM) program for the Project. Overall, with implementation of mitigation measure T-1, the Project would result in a less than significant traffic impact.

Regional Traffic Impacts

The Congestion Management Program (CMP) for the County of Los Angeles requires that all freeway segments where a project is expected to add 150 or more trips in any direction during the peak hours be analyzed. An analysis is also required at all CMP intersections where a project would likely add 50 or more trips during the peak hours.

The two nearest CMP freeway monitoring locations, and hence the freeway segments expected to experience the most Project traffic, are: 1) the Santa Monica (I-10) Freeway east of Overland Avenue, and 2) the San Diego (I-405) Freeway north of Venice Boulevard.

- Santa Monica (I-10) Freeway e/o Overland Avenue: 10 vehicles westbound and -18 vehicles eastbound in the AM peak hour; -68 vehicles westbound and -22 vehicles eastbound in the PM peak hour.
- San Diego (I-405) Freeway n/o Venice Boulevard: 10 vehicles westbound and -18 vehicles eastbound in the AM peak hour; -68 vehicles westbound and -22 vehicles eastbound in the PM peak hour.

The Project volumes at these locations are below the CMP threshold value for freeway segments and no CMP analysis is required.

The two nearest intersections that are both CMP and study intersections are: 1) Santa Monica Boulevard and Wilshire Boulevard, and 2) Wilshire Boulevard and Beverly Glen Boulevard. The Project's maximum net contributions are expected to be -10 trips (AM peak hour) to the intersection of Santa Monica Boulevard and Wilshire Boulevard and -9 trips (AM peak hour) to the intersection of Wilshire Boulevard and Beverly Glen Boulevard. These contributions are below the CMP threshold value for intersections. Furthermore, the already conducted DOT analysis for these two intersections determined there would be no significant Project impacts.

Construction Impacts

Construction of the Project will require demolition of the two existing buildings, and construction of the Project building. Traffic during construction activities would be generated by activities including construction equipment, crew vehicles, haul trucks and trucks delivering building materials. Removal of these materials during the demolition phase is expected to require approximately 41 round trip truckloads per day (or 82 directional daily trips, counting the arrival and departure of each truck separately). It is also estimated that a maximum of 200 daily construction workers will be traveling to and from the site during demolition. During the construction phase, all trips generated by the existing uses, would be replaced by fewer trips comprised of commuting construction personnel and haul trucks. Nevertheless, it will be necessary to develop and implement a construction traffic control plan, including the designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction. Currently, the Project's haul route is not approved and is subject to the City's approval process. This process includes a public hearing and opportunities for the public to comment on the proposed route.

Parking and Pedestrian Access

The following parking analysis is based upon a Parking Capacity Study prepared by International Parking Design, Inc., included as an appendix to the Project traffic study. Currently, there are 45 parking spaces at grade, 186 spaces on parking level A, 604 spaces on level B, 1,144 spaces on level C, 1,155 spaces on level D, 1,151 spaces on level E and 1,186 spaces on level F totaling 5,471 parking spaces on-site. In addition, there are 451 off-site parking spaces in the garage west of the Century Plaza Hotel, which are covenanted for the site. Therefore, the existing parking supply for the overall site is 5,922 spaces. The code parking required for the 2029 and 2049 Century Plaza Towers is 4,205 spaces. This requirement is currently and would continue to be fully satisfied by available parking supplies. Code parking required for 2020 and 2040 Avenue of the Stars is 1,717 spaces.

For the Project uses, the required parking is 1,860 spaces including parking space reductions pursuant to Los Angeles Municipal Code Sections 12.21-A4(c) and 12.24-Y. Together with the parking requirements of the Century Plaza Towers (4,205 spaces), the parking requirement for the overall site after Project completion would be 6,065 spaces. Construction of the proposed Project would remove all of the site uses except for the Century Plaza Towers and the subterranean parking garage. Due to the structural improvements to the subterranean columns, parking spaces in the garage would be modified. As discussed in Section V.M, the Project has two alternatives for parking. Under the preferred parking plan, the Project would provide all code required parking on-site including: 45 parking spaces at grade, 172 spaces on parking level A, 597 spaces on level B, 1,222 spaces on level C, 1,233 spaces on level D, 1,229 spaces on level E and 1,264 spaces on level F. Additionally the Project would provide parking spaces on portions of two levels that currently do not provide parking. This would include 409 spaces on the Parking level and 187 spaces on the Plaza level for a total of 6,358 on-site parking spaces. Alternatively the Project would satisfy code parking requirements by providing 5,867 spaces on-site and 451 spaces off-site for a total of 6,318 spaces. No parking impact is anticipated as a result of the proposed Project.

Pedestrian access to the Project and the plaza would be available from numerous locations along Avenue of the Stars, Constellation Boulevard and Century Park East. Pedestrian access into the new

office building would be available from Avenue of the Stars on the west side, as well as from the plaza on the eastern side. A grade-separated pedestrian crossing is being provided below Avenue of the Stars to allow pedestrians to easily walk between the Century Plaza Hotel and the Project site.

The pedestrian corridor would connect the existing courtyard at the Century Plaza Hotel to the new plaza elevation by way of a well-lit and ventilated pedestrian corridor under Avenue of the Stars. The pedestrian corridor slopes down from the Hotel courtyard about 5 feet over 150 feet to an escalator that connects up one level to the Plaza level lobby. The Plaza level lobby is lined with retail uses and connects directly to the landscaped plaza. Pedestrian access between the parking levels and the structure would be available using elevators, escalators and stairwells.

Mitigation Measures

The following mitigation measures would reduce Project related impacts to a less than significant level:

- T-1** The Project shall implement a Transportation Demand Management (TDM) program as set forth in Appendix 18 and in compliance with all TDM/trip reduction ordinances of the City of Los Angeles. The TDM program shall be designed and operated to encourage ridesharing, transit usage and bicycle usage among Project employees, with the goal of achieving Project vehicular trip generations of 996 trips or less during the AM peak hour and 1,119 trips less during the PM peak hour. Among the services and amenities expected to be included in the TDM program are designated carpool and vanpool parking spaces; bicycle parking, clothes lockers and related facilities; centralized ridesharing and public transit information; on-site sale of transit passes; and participation in the Century City Transportation Management Organization that is to be developed by the Constellation Place project. The Program includes financial penalties for non-compliance and the ability to implement additional or other measures as necessary should it be determined that the Project has not attained the above trip generation targets. See Appendix 18 and LADOT Letter dated July 11, 2002 in Appendix 13. The final TDM program, including a monitoring procedure, will be refined in consultation with LADOT.
- T-2** A Project construction traffic control plan will be developed, to the satisfaction of LADOT, including a designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction.
- T-3** Construction employees commuting to the Project site shall not be allowed to park on public streets.

Significant Project Impacts After Mitigation

As indicated in the preceding summary, assuming 50 percent internal trip adjustments (i.e., Revised LADOT Methodology), the proposed Project may significantly impact the intersection of Santa Monica Boulevard (North) at Avenue of the Stars. To mitigate this potential impact, the applicant shall implement a Transportation Demand Management (TDM) program for the project. The TDM program will be designed and operated to further encourage ridesharing, transit usage and bicycle usage among project employees. Among the services and amenities expected to be included in the TDM program are designated carpool and vanpool parking spaces; bicycle parking, clothes lockers and related facilities; centralized ridesharing and public transit information; on-site Transportation Coordinator providing assistance with carpool and vanpool matching; on-site sale of transit passes; and participation in the Century City Transportation Management Organization that is to be developed by the Constellation Place project. The final TDM program will be refined in consultation with LADOT and will comply with all applicable TDM/trip reduction ordinances of the City of Los Angeles. The office use of the proposed Project is expected to generate 943 AM and 833 PM peak hour trips. It is estimated that the Project TDM program will achieve at least a five percent reduction in these trips amounting to 47 fewer

AM peak hour trips and 42 PM peak hour trips. Incorporating these reductions into the previously calculated table, the adjusted net trips for the proposed Project uses due to the TDM mitigation measure are 996 AM peak hour trips and 1,119 PM peak hour trips.

As indicated, the implementation of the TDM program would effectively mitigate the Project impact at the intersection of Santa Monica Boulevard (North) at Avenue of the Stars to a less than significant level. This measure would also further reduce non-significant Project impacts at other intersections.

As indicated in the traffic analysis, the Project will not significantly impact any residential streets. Nevertheless, the Project voluntarily agrees to provide funding to assist surrounding residential neighborhoods in implementing a Neighborhood Traffic Protection Program (NTPP) to minimize intrusion by non-residential traffic. In addition to administering the funds, LADOT will be responsible for developing and implementing the NTPP in consultation with the appropriate residential neighborhood groups and associations and Council Office. Measures may include, but are not limited to, traffic control devices including turn prohibitions, traffic diverters, street closures, partial cul-de-sacs, speed humps, retiming of traffic signals, right-turn-on-red restrictions, or other measures to discourage traffic intrusion.

Cumulative Impacts

Trips generated as a result of development of projects included under the related projects list were estimated by using trip generation formulas where applicable, or were obtained from previous traffic studies. The estimated trips were distributed and analyzed as part of the future 2005 With and Without Project conditions. As shown above, the proposed Project would result in a less than significant traffic impact after mitigation and would not contribute to cumulative traffic impacts.

UTILITIES AND SERVICE SYSTEM

1. Wastewater

Project Impact

The Hyperion Treatment Plant (HTP) currently provides wastewater treatment for nearly all of the City of Los Angeles, as well as several contract cities including Santa Monica, Beverly Hills, Burbank, Culver City, El Segundo, Glendale, San Fernando and portions of Los Angeles County. Completed in 1950, the Hyperion Treatment Plant was originally designed with a treatment capacity of 320 million gpd. Since that time, the plant's capacity to provide full secondary treatment has been increased to 450 mgd. Current operations treat approximately 360 mgd to an acceptable level of primary and secondary treatment standards. Peak wet weather flows up to 1,000 mgd can be handled for short periods.

The City of Los Angeles Bureau of Sanitation has indicated that the proposed Project would result in an additional wastewater generation of 0.02 cfs (about 10,000 gpd)³. This represents approximately 1.0% of the flow design capacity of limit of the 12-inch sewer line in Avenue of the Stars. However, the City of Los Angeles assumes water consumption is equal to wastewater generation as a worst case scenario. The water consumption analysis prepared by the LADWP, determined that the Project would result in a net increase in water demand of 21 acre feet per year or an average daily increase of 18,711 gpd. This amount would represent approximately 1.5% of the flow design capacity limit of the existing sewer line. The City Bureau of Sanitation has indicated that should the Project generate either 10,000 gpd or 18,711 gpd, there is sufficient capacity in the sewer system to accommodate the Project.⁴

³ City of Los Angeles Bureau of Sanitation Wastewater Engineering Services Division, letter dated April 26, 2002.

⁴ City of Los Angeles Bureau of Sanitation, letter dated April 26, 2002, and phone conversation with Mr. Nelson Sarti, Bureau of Sanitation, May 13, 2002.

Mitigation Measures

The Project will not generate a significant wastewater impact. Therefore, no mitigation measures are warranted.

Significant Project Impacts After Mitigation

The proposed Project would not generate significant wastewater impacts.

Cumulative Impact

Related projects would generate an estimated 625,371 GPD of wastewater. Adding the proposed Project would result in a total wastewater generation of 644,082 GPD. Related projects must comply with the City's water conservation policies and would also be subject to review for adequate sewer capacity. The cumulative impact would be consistent with the General Plan and no major inconsistencies with the Wastewater Facilities Plan are anticipated. Therefore, cumulative impacts to the wastewater treatment systems would be considered less than significant.

2. Stormwater

Project Impacts

Construction Impacts

The Project would be designed to comply with all applicable construction and operational water quality standards and waste discharge requirements. The proposed Project would be required to file a stormwater plan with the City of Los Angeles for grading activities during the construction phase. As mentioned above, it is anticipated that the existing NPDES permit and/or its requirements would remain in effect throughout the Project with the possibility of a temporary permit for the construction phase.

There are two major sources of stormwater pollution that can occur during the construction phase of a Project. The first source is materials found on the construction site that contain pollutants that can be transported through runoff. Pollutants can be found in the following construction-related materials including: adhesives, cleaning agents, landscaping materials, plumbing materials, paint, heating/cooling machinery, masonry materials, floor and wall coverings, demolition debris, construction equipment vehicles and maintenance supplies. Proper handling and storage of such materials would effectively mitigate any potential impacts to a less than significant level.

The second major source of stormwater pollution during construction is sedimentation. Grading activities during the construction process can expose soils that are more susceptible to erosion. Best Management Practices (BMPs) from the stormwater plan should be designed to limit the amount of sediment entering the storm drain system, controlling runoff so that sediment is captured before the stormwater leaves the site and enters the storm drain system. The proposed Project could result in a potential impact to the water quality of runoff from the site. However, implementation of the appropriate BMPs and compliance with the stormwater plan would reduce construction related stormwater pollution impacts to a less than significant level. BMPs for the proposed Project are listed as mitigation in this section.

Operational Impacts

The proposed Project will not generate stormwater run-off in excess of the existing conditions of the site, and not affect the amount of surface water in any of the surrounding water bodies. The majority of the run-off from the proposed Project will be from rooftop drainage, sidewalks, driveways and other impermeable surface drainage, which will flow through existing municipal storm drain facilities. The proposed Project design would be consistent with existing conveyance facilities and would not result in a permanent, adverse change to the movement of surface water sufficient to produce substantial change in the current or direction of water flow. Potentially significant impacts

to water quality could result from the release of toxins into the stormwater drainage channels during the routine operation of commercial uses, including restaurants. However, the potential impacts would be mitigated to a less than significant level by incorporating stormwater pollution control measures. With conformance to a stormwater plan, an NPDES permit, and mitigation measures U-1 through U-15, the proposed Project would result in a less than significant impact with regard to stormwater runoff.

Mitigation Measures

Implementation of the following mitigation measures would reduce stormwater impacts to a less than significant level.

- U-1** The Project shall comply with NPDES requirements of the existing stormwater drain permit along with the preparation of a stormwater plan and other applicable filings prior to construction.
- U-2** During construction, drainage of the Project site shall be disposed of in a manner satisfactory to the City Engineer and the Regional Water Quality Control Board.
- U-3** The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development of Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required. The applicant will be required to implement stormwater BMPs to filter the runoff from storm events.
- U-4** Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- U-5** Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- U-6** Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.
- U-7** Reduce and recycle waste, including oil and grease, to the extent feasible.
- U-8** Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.
- U-9** All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
- U-10** The legibility of signs and stencils discouraging illegal dumping must be maintained.
- U-11** Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.
- U-12** Storage areas must be paved and sufficiently impervious to contain leaks and spills.

- U-13** Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.
- U-14** The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.
- U-15** Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the Planning Department's public counter or from the City's website at www.lastormwater.org.

Significant Project Impacts After Mitigation

The construction and operation of the Project could potentially result in a significant impact. Implementation of identified mitigation measures, BMPs, and compliance with NPDES regulations would reduce any Project-related impacts to stormwater drainage to a less than significant level.

Cumulative Impacts

Development of projects included in the related project list would not substantially contribute additional runoff to the existing storm drainage system. Currently, most of the properties are predominantly covered with impermeable surfaces, conveying the majority of runoff into the storm drains. Therefore, the cumulative increase in runoff from these projects is minimal and is not anticipated to cause downstream flooding. Cumulative impacts associated with stormwater drainage from the Project site, as well as those associated with related projects, are expected to be less than significant.

3. Water Supply

Project Impacts

Based on a water consumption analysis prepared by the LADWP. (**Appendix 14**), water demand generated from the existing land uses is approximately or 61 AF per year or an average daily demand of 54,351 gallons of water per day (GPD) seven days per week. This determination is based upon year 2000 water billings. A percentage of the existing supply and infrastructure capacity serving the area around the Project site is allocated to the existing land uses. The consumption of water from existing land uses will be subtracted from the Project's contribution as a means of accurately calculating the net increase as a result of the Project.

The LADWP presently maintains the following water mains around the Project area: 8" cast iron main within Constellation Boulevard; 12" cast iron and steel main within Avenue of the Stars; and 12" cast iron mains in both Olympic Boulevard and Century Park East.

According to the LADWP, the proposed Project would consume 82 AF per year or an average daily demand of 73,062 GPD. The LADWP has determined that the projected increase in water demand is consistent with projected growth in water demand outlined in LADWP's year 2000 Urban Water Management Plan Update. The LADWP has further indicated that estimated water needs of the Project could be met by the existing water system. Therefore, the Project would not result in a significant impact on water supply.

Mitigation Measures

Although Project impacts are less than significant, the following mitigation measures would help to further reduce impacts:

- U-16** The proposed Project shall use automatic sprinkler systems for landscape irrigation, which are adjusted on a seasonal basis to operate during hours where water loss due to evaporation would be minimized.
- U-17** Where feasible, reclaimed water shall be used to irrigate landscaped areas.
- U-18** The proposed Project shall comply with all sections of the City of Los Angeles' Water Conservation Ordinance (Ordinance No. 166,080) and Xeriscape Ordinance, as applicable.
- U-19** The proposed Project shall use lower-volume water faucets and water saving showerheads in all construction.
- U-20** The proposed Project shall use plumbing fixtures that reduce potential water loss from leakage due to excessive wear of washers.
- U-21** The proposed Project shall incorporate water conservation measures as appropriate and required by the City of Los Angeles Department of Building Ordinances (No. 163,532, No. 164,093, and No. 165,004) and subsequent amendments, which include the installation of low-flow water fixtures and xeriscape.

Significant Project Impacts After Mitigation

The proposed Project would not generate significant adverse impacts to water supply and infrastructure.

Cumulative Impact

Implementation of all projects within the related project list would result in the consumption of approximately 597 AF per year. Calculation of this number is shown in **Table V.N.3-1**. The addition of the proposed Project would result in a net water consumption of 618 AF per year. According to the LADWP Urban Water Management Plan, water use within the City is expected to grow to 800,000 AF per year by the year 2020. The cumulative increase in water demand from related projects is consistent with projected growth in water demand outlined in LADWP's year 2000 Urban Water Management Plan Update. Improvements to the local infrastructure may be required to serve the related projects, and should be evaluated on a project-by-project basis. Although cumulative impacts may be significant, they are expected to be mitigated on a project-by-project fair share basis. Assuming that the related projects comply with the City's required water conservation policies, the impact on water supply would be considered less than significant.

4. Solid Waste

Project Impacts

Construction Impacts

During the construction phase, existing structures would be demolished to make room for the proposed Project. As a result of the demolition process, approximately 80,000 tons of debris would be removed from the Project site. It is anticipated that at least 50 percent of these materials removed from the Project site would be reused and/or recycled. The remaining materials would be disposed of at a landfill. A licensed hazardous waste disposal expert would dispose of all hazardous materials (i.e. asbestos) in accordance with applicable regulations. (See Section V.F, Hazards and Hazardous Materials.) The applicant proposes to implement a recycling program during the construction phase of the Project to reduce the amount of solid waste sent to area landfills. Materials to be recycled or salvaged include glass, concrete, steel, doors, and bathroom fixtures. Diversion of demolition materials would be in conformance with the City's 50 percent reduction goal. Further, the impact during construction is temporary, and would not extend for the life of the Project. Considering the magnitude of waste generated during the construction process and the limited duration of impact, the Project would generate a less than significant impact on solid waste facilities.

Operational Impacts

Based on generation rates provided by the Los Angeles Bureau of Sanitation, the operational phase of the existing uses creates approximately 18,820⁵ pounds of solid waste per week. The proposed Project would have a net increase of 4,843 pounds per week. The City of Los Angeles screening threshold for analysis of potentially significant impacts for solid waste generation is five tons (10,000 pounds) per week. The proposed Project's net generation would fall below this threshold and well below the actual threshold of significance. No significant impact is expected to occur. Impacts would be further reduced through implementation of the proposed mitigation measures.

Because we do not know the collector or the receiving landfill, it is premature to perform an analysis of specific landfill capacity. Landfills with the potential for receiving solid waste from the proposed Project include: Bradley West, Sunshine Canyon, Scholl Canyon, and Calabasas. As shown in Section V.N.4, substantial capacity exists at these landfills. In addition, applications are made periodically for the expansion of existing landfills and the creation of new ones. The Bureau of Engineering continually plans⁶ for solid waste disposal, to assure that the disposal needs and recycling requirements of City development can be met.

Mitigation Measures

While the Project impacts during the construction and operational phase are not considered significant based on City thresholds, the following mitigation measures shall be implemented to further reduce impacts on solid waste resources:

- U-22** The Project applicant shall salvage and recycle construction and demolition materials to the maximum extent feasible. Documentation of a recycling program will be provided to the City of Los Angeles Department of Public Works.
- U-23** The Project applicant shall institute an on-site recycling/conservation program to reduce the volume of solid waste going to landfills in compliance with the City's goal of a 50% reduction in the amount of waste going to landfills.

Significant Project Impacts After Mitigation

The Project would not result in significant adverse impacts to solid waste capacity.

Cumulative Impact

Related projects would generate an estimated 35,015 pounds of solid waste per day. Build-out of the proposed Project would increase this amount to 36,447.8 pounds of solid waste per day. Because sufficient landfill capacity is available to receive solid waste from the related projects, including the proposed Project, cumulative impacts to the solid waste systems would be considered less than significant.

5. Electricity

Project Impacts

The Project proposes to redevelop the existing uses with office (719,924 sf), restaurant (30,527 sf), retail (18,318 sf) and cultural uses (10,178 sf). According to the total demand analysis (**Appendix 15**), the proposed Project would consume approximately 7,911,952 kWh of electrical energy (based on Title 24 model). Development of the proposed Project would result in a net decrease of 3,220,728 kWh when compared to the existing land uses. The proposed Project would result in an incremental decrease to the local and regional demand for electrical service. The decreased demand would result in a less than significant adverse impact on electrical resources.

⁵ Based on solid waste generation prior to implementation of recycling program.

⁶ City of Los Angeles Solid Waste Management Policy Plan.

Mitigation Measures

The proposed Project would result in a less than significant impact on energy resources. Nevertheless, the following mitigation measures would further reduce electrical demand:

- U-24** The proposed Project shall comply with the energy requirements set forth in Title 24 of the California Code of Regulations.
- U-25** The Project applicant shall consult with the LADWP regarding the implementation of energy conservation measures including:
- Built-in appliances, refrigerators, and space conditioning equipment that exceed the minimum efficiency levels mandated in the California Code of Regulations.
 - High efficiency air conditioning controlled by a computerized energy management system in the office and retail spaces.
 - Circulation of ventilation air from high-priority to low-priority areas before being exhausted thereby decreasing the volume of ventilation air required.
 - Ensure that buildings are well sealed to prevent outside air infiltrating and increasing interior space conditioning loads.
 - Performance check the installed space conditioning system (to be completed by the developer/installer) prior to issuance of the certificate of occupancy to ensure that energy efficiency measures incorporated into the Project operate as designed.
 - Design window systems to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.
 - Install fluorescent and high intensity discharge (HID) lamps, which give the highest light output per watt of electricity consumed wherever possible, including exterior fixtures.
 - Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
 - Control heating, ventilation and air conditioning (HVAC) and lighting mechanical systems with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied areas.

Significant Project Impacts After Mitigation

The proposed Project would consume less energy than the existing uses; therefore the Project would not result in an impact on electrical resources. Implementation of the mitigation measures set forth in this section would further reduce impacts and conserve energy.

Cumulative Impacts

The total energy demand generated as a result of development of projects included under the related projects list could result in a significant impact on existing LADWP energy load. However, based on the Total Energy Demand Load analysis (**Appendix 15**), the proposed Project would consume less electrical energy than the existing land uses. Therefore, the proposed Project would not contribute to cumulative energy impacts, even if the related projects were to be considered cumulatively significant.

ALTERNATIVES

The criteria for defining project alternatives is the potential to attain most of the basic objectives of the Project while reducing or eliminating 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.

Four alternatives, including the “No Project Alternative,” were evaluated. 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 does 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.⁷ 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 located at 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, 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 VI.C through F, below. The impact conclusions are summarized in **Table VI-2**, for easy comparison.

⁷ All building areas are expressed in Floor Area as defined by the Century City North Specific Plan, unless otherwise noted.

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-2**, 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.

III. PROJECT DESCRIPTION

A. INTRODUCTION

The Trammell Crow Company is currently seeking approval of a proposal to redevelop 9.20 acres of a 14.02-acre site within Century City, at the southeast corner of Constellation Boulevard and Avenue of the Stars (**Figure PD-1, Regional Location, and Figure PD-2 Project Location**). The Project site is currently developed with commercial structures that include 3,067,338 square feet (sf) of office space, retail space, a theater, a multiplex cinema, restaurants, and a health club. The proposed Project, referred to as 2000 Avenue of the Stars, includes demolition of two structures on the Project site and construction of a new commercial office building. The proposed building would also provide restaurant, retail, and cultural space, as described further below. The two existing Century Plaza Towers would remain unchanged.

The proposed Project is designed to replace two existing buildings, which no longer meet current standards of operation. The office space contained within the structures representative of Class B-C buildings⁸, and the presence of materials such as asbestos make any renovations short of complete reconstruction prohibitive. The new Project would meet the demand for modern office space in Century City and provides a more efficient use of the property.

B. PROJECT LOCATION

The proposed Project site comprises the block that is bounded by Constellation Boulevard to the north, Avenue of the Stars to the west, Olympic Boulevard to the south, and Century Park East to the east. As shown in **Figure PD-2**, the site includes the two buildings at 2020 and 2040 Avenue of the Stars, the Century Plaza Towers on the east side of the block (2029 and 2049 Century Park East), and the diamond-shaped plaza between these buildings. The subject property is located within the boundaries of the West Los Angeles Community Plan and the Century City North Specific Plan.

The proposed Project site is centrally located within Century City. Immediately surrounding uses include the Century Plaza Hotel to the west, commercial buildings to the north and east, and condominiums to the south. To the northwest of the subject property is the Westfield Shoppingtown Century City. The surrounding area includes many modern high-rise buildings, including the SunAmerica building, Watt Towers, Fox Plaza, Constellation Place and the St. Regis Hotel.

⁸ For the purposes of comparison, office space is grouped into three classes (metropolitan base). These classes represent a subjective quality rating of buildings which indicates the competitive ability of each building to attract similar types of tenants. A combination of factors including rent, building finishes, system standards and efficiency, building amenities, location/accessibility and market perception are used as relative measures. Building amenities include services that are helpful to either office workers or office tenants and whose presence is a convenience within a building or building complex. Examples include food facilities, copying services, express mail collection, physical fitness centers or child care centers. As a rule, amenities are those services provided within a building. The term also includes such issues as the quality of materials used, hardware and finishes, architectural design and detailing and elevator system performance.

Class A: Most prestigious buildings competing for premier office users with rents above average for the area. Buildings have high quality standard finishes, state of the art systems, exceptional accessibility and a definite market presence.

Class B: Buildings competing for a wide range of users with rents in the average range for the area. Building finishes are fair to good for the area and systems are adequate, but the building does not compete with Class A at the same price.

Class C: Buildings competing for tenants requiring functional space at rents below the average for the area.

Source: Building Owners and Managers Association (BOMA), Building Classification Website, www.boma.org/classes.htm, March 7, 2002.

Figure PD-1 Regional Location

Figure PD-2 Project Location

C. EXISTING DEVELOPMENT

The 14.02-acre subject property is zoned C2-2-0 and is currently developed with a commercial complex that includes office buildings, theater, restaurant, retail and health club space as shown in **Table III-1**.

Table III-1
Existing Uses on the Subject Property

Existing Use	Size ⁹
Office	2,646,387 sf
Theater	148,481 sf
Restaurant	158,680 sf
Retail	72,856 sf
Health Club	40,934 sf
Total	3,067,338 sf

These uses are contained within two eight-story buildings at 2020 and 2040 Avenue of the Stars and the two 44-story Century Plaza Towers at 2029 and 2049 Century Park East. A six-level below-ground parking structure beneath the site currently provides parking for uses onsite. A 3-acre public plaza is located between the two sets of buildings. A paved plaza area provides benches and a small flower garden.

The area of redevelopment encompasses 9.20 acres, which includes the two eight-story structures at 2020 and 2040 Avenue of the Stars. **Table III-2** shows existing uses on the portion of the Project site to be redeveloped. Office use constitutes the largest use in the existing eight-story structures. **Figure PD-3** illustrates the existing and proposed land use comparison for the total project site and the area to be redeveloped.

Table III-2
Existing Uses on the Area to be Redeveloped

Existing Use	Size
Office	287,701 sf
Theater	148,481 sf
Restaurant	144,390 sf
Retail	57,316 sf
Health Club	40,934 sf
Total	678,822 sf

D. PROPOSED DEVELOPMENT

The proposed Project would redevelop the western portion of the subject property as shown in (**Figure PD-4**), Proposed Site Plan. This project includes replacement of two existing buildings along Avenue of

⁹ All building areas in this document are expressed in Floor Area as defined by the Century City North Specific Plan, unless otherwise noted.

Figure PD-3 Existing and Proposed Land Use Comparison

Figure PD-4 Proposed Site Plan

the Stars with a Class “A” office building, renovation of the existing plaza, and modification of structural supports located in the parking structure. The existing Century Plaza Towers along the east side of the site would not be modified by the proposed Project. Overall site development would increase from 3,067,338 to 3,167,463 square feet (sf). Each of the Project components is described below.

Proposed Office Building

As shown on **Table III-3**, the proposed building would include approximately 778,947 square feet of office, restaurant, retail, and cultural space. The office building would contain “Class A” office space, including upgraded utilities, optimal floor plates that meet current market demands, energy efficient equipment and materials, and amenities.

**Table III-3
Proposed Development**

Proposed Use	Size
Office	719,924 sf
Restaurant	30,527 sf
Retail	18,318 sf
Cultural	10,178 sf
Total	778,947 sf

The proposed 15-story structure would have an approximate height of 215 feet above grade at the plaza level, and 201 feet above grade on Avenue of the Stars. Two of the 15 floors would be located below grade on Avenue of the Stars and above grade from the plaza level. As shown in **Figure PD-5**, the building would be anchored on the north and south ends, and have an opening in the center of the structure. The building would be of steel frame and glass curtain wall construction, with two elevator banks (one serving each half of the building). Stairwells would serve each side of the building, as well. The central opening in the structure, a character-defining element, would give it a landmark presence.

This design feature addresses market demands for a unique office environment. The large opening is created by spanning between the two ends of the building at the upper and lower levels, creating larger and smaller floor plate sizes. From street level on Avenue of the Stars, this rectangular, open-air space would frame views of the two triangular towers in the distance. Pedestrian entrance to the building would be from both east and west. Access from the parking levels would also be available directly from centrally located escalators and elevators.

The building architecture would be clean and modern in style, utilizing clear glazing and metal cladding as major materials. The building recognizes and complements the scale and symmetry of the Century Plaza Towers and the Century Plaza Hotel. The office space would be of the highest caliber, with optimum ceiling heights, floor to ceiling glass and amenities.

Restaurant space would be located on the plaza level. These restaurants would take advantage of the plaza views and provide new dining opportunities for lunch and dinner service at a range of price levels.

A cross-section of the proposed building is shown in **Figure PD-6**. Garage levels A through F are existing levels of parking that would remain (although the number of and layout of some parking spaces would change as a result of the structural improvements.) The existing and proposed parking is

Figure PD-5 Building Elevations

Figure PD-6 Building Cross-Section

discussed in more detail below and in section V.M. All levels above garage level A reflect new development as follows:

- A **Parking Level** located immediately below the Plaza Level (see **Figure PD-7**) and extending under Avenue of the Stars would provide new parking stalls. Centrally located escalators would provide access to the plaza.
- The **Plaza Level** would include the renovated plaza as well as retail, and restaurant space as shown in **Figure PD-8**. Restaurant and retail space would be located facing an outdoor plaza. A freestanding restaurant is planned for the north side of the plaza. Outdoor eating areas would be provided adjoining the restaurants. The remainder of this level would include space within the parking structure, which would not be visible from the plaza. Access to the Plaza Level would be via the Street Level or from the parking area.
- The **Street Level** includes the office building lobby, some tenant space and a cultural facility as described below. Valet drop off access to the building would be provided at this level on Avenue of the Stars. See **Figure PD-9** for the Street Level Plan.
- The **Mezzanine** through **Twelfth Levels** would provide office space. A typical floor layout is provided in **Figure PD-10**.
- Mechanical equipment would be located in a penthouse or screened behind enclosures at the top of the structure.
- A helipad would be constructed on the roof of the building for emergency use. No commercial use would be permitted.

Plaza Renovation

The renovated landscaped plaza for the Project provides an amenity for use by employees of and visitors to Century City. The landscape design offers an opportunity to provide an inviting landscaped area in an office environment. The design of the landscaped plaza would benefit the adjacent office population. The three-acre landscaped plaza would consist of a central lawn surrounded by office towers, restaurants, and retail uses. A pedestrian promenade would direct guests from Avenue of the Stars through the site, passing by sitting areas, gardens, flowering canopy trees, courtyards, and grassy slopes.

The landscaped plaza would transform the existing plaza space into a functional venue for a myriad of uses in the heart of Century City. The basic design and configuration of the proposed plaza lends itself to a variety of events and gatherings. The proposed plaza could be an on-going home for a range of outdoor events and performances throughout the year. In addition, the plaza could host special events, social and corporate parties.

Landscape Plan

The proposed Landscape Plan is shown in **Figure PD-11**. The existing central hardscape plaza would be replaced with a diamond-shaped central lawn area, flanked by jacaranda and poplar trees along the northwest and southern edges. Additional rows of jacaranda trees would be planted between the lawn and the restaurant on the north side of the Project. Pine trees would be planted on the slopes to the south and east of the cultural facility and on the east and west sides of the garage access from Constellation Boulevard.

Cultural Facility

As an integral part of the proposed Project, a 10,178-sf facility would be constructed adjacent to the central plaza, specifically for a cultural use. It is intended to house exhibition areas for one or more major cultural institutions, and may host live performances, or house an art gallery or branch of a notable museum. Together with the three-acre landscaped plaza area, this building, would create a

Figure PD-7 Parking Level Plan

Figure PD-8 Plaza Level Plan

Figure PD-9 Street Level Plan

Figure PD-10 Typical Floor Plates for Mezzanine to Level 12

Figure PD-11 Proposed Landscape Plan

world-class amenity for both tenants of surrounding offices as well as nearby residents and visitors. The facility would be secure and accessible to the public.

Parking and Access

The existing parking supply for the overall site is 5,922 spaces. Currently, there are 45 parking spaces at grade, 186 spaces on parking level A, 604 spaces on level B, 1,144 spaces on level C, 1,155 spaces on level D, 1,151 spaces on level E and 1,186 spaces on level F, totaling 5,471 parking spaces onsite. In addition, there are 451 off-site parking spaces in the garage west of the Century Plaza Hotel, which are covenanted for the site. People parking at the off-site garage, located at 2030 Century Park West, access the Project site via a walkway located to the south of the Century Plaza Hotel. This path leads to the below grade plaza of the Hotel and then through the pedestrian corridor under Avenue of the Stars. With the new project, the pedestrian corridor would lead pedestrians directly into the lobby of the new building.

Construction of the proposed Project would remove all of the site uses except for the Century Plaza Towers and the subterranean parking garage. Due to the structural improvements to the subterranean columns, parking spaces in the garage would be modified. Parking under the Century Plaza Towers would not be affected.

The total code required parking spaces for the proposed Project is 6,065 spaces and includes parking space reductions pursuant to Los Angeles Municipal Code Section 12.21-A4(c) and Section 12.24-Y. Section 12.21-A 4(c) provides for parking reductions for bicycle spaces provided on-site. In addition, Section 12.24-Y provides further parking reductions for commercial buildings located within 1,500 feet from a transit facility.

The preferred parking plan would provide all code required parking on-site. The Project would provide 45 parking spaces at grade, 172 spaces on parking level A, 597 spaces on level B, 1,222 spaces on level C, 1,233 spaces on level D, 1,229 spaces on level E and 1,264 spaces on level F. Additionally the Project would provide parking spaces on portions of two levels that currently do not provide parking. This would include 409 spaces on the Parking level and 187 spaces on the Plaza level for a total of 6,358 on-site parking spaces. The proposed parking plan would include tandem parking with parking attendants on all parking levels except level B.

Alternatively, the Project would satisfy all code required parking by providing on-site and off-site parking. Under this plan, the Project would provide 45 spaces at grade, 177 spaces on parking level A, 595 spaces on level B, 1,112 spaces on level C, 1,123 spaces on level D, 1,119 spaces on level E and 1,154 spaces on level F. Additionally the Project would provide parking spaces on portions of two levels that currently do not provide parking. This would include 372 spaces on the Parking level and 170 spaces on the Plaza level for a total of 5,867 on-site. Also, 451 off-site spaces would be provided, for a total of 6,318 spaces.

Among the updated transportation management items, vehicles would access the site via the subsurface parking lot and valet drop-off as shown in **Figure PD-12**. The valet drop-off and pick-up area on Avenue of the Stars has been designed to provide maximum efficiency and convenience for visitors and would provide direct access to the parking garage. The parking spaces located on the Plaza level would be allocated to valet services. Access to the parking garage would continue to be provided from Constellation Boulevard, the driveway on Century Park East and Olympic Boulevard.

Pedestrian access to the Project and the plaza would be available from numerous locations along Avenue of the Stars, Constellation Boulevard and Century Park East. Pedestrian access into the new office building would be available from Avenue of the Stars on the west side, as well as from the plaza on the eastern side. In compliance with the Century City North Specific Plan, a grade-separated pedestrian crossing is being provided below Avenue of the Stars to allow pedestrians to

Figure PD-12 Project Driveway and Parking Access Locations

easily walk between the Century Plaza Hotel and the retail, restaurants and amenities in the 3-acre landscaped plaza in the 2000 Avenue of the Stars project.

The pedestrian corridor would connect the existing courtyard at the Century Plaza Hotel to the new plaza elevation by way of a well-lit and ventilated pedestrian corridor under Avenue of the Stars that would be approximately 16 feet wide, and between 10 and 15 feet in height. A canopy of signage would mark the enlarged entry on the Hotel side, and a series of murals would decorate the pedestrian corridor itself (**Figure PD-13**). The pedestrian corridor would have a tiled floor, plaster walls and a plaster ceiling with cove lighting. The pedestrian corridor slopes down from the Hotel courtyard about 5 feet over 150 feet to an escalator that connects up one level to the Plaza level lobby. The Plaza level lobby is lined with retail uses and connects directly to the landscaped plaza. Pedestrian access between the parking levels and the structure would be available using elevators, escalators and stairwells, as noted above.

Demolition/Construction Process

As mentioned above, the Project would involve the removal of the two existing eight-story building, and development of the proposed 15-story building. A summary of the demolition and construction process is included under **Appendix 5**. The demolition and construction process would occur over a 25-month period. During construction, the pedestrian corridor would be unavailable for usage. During that time, pedestrians coming from the west would access the Project site by at grade pedestrian crossings across Avenue of the Stars.

At the Project site, there are 1,717 parking spaces allocated to the existing ABC Entertainment Center buildings. During the construction phase, these spaces will all be available for construction employee vehicle parking. Project construction will involve a maximum of approximately 200 construction worker vehicles on site at any given time. The Project applicant will also be encouraging a ride share program for construction employees to decrease the number of construction vehicles accessing the site. Construction will be phased so that only limited portions of the parking areas will be impacted and unavailable for vehicle parking. Out of the available 1,717 parking spaces, it is anticipated that approximately 300 parking spaces will be unavailable at any given time due to the construction work. In addition, there are excess parking spaces available in nearby, off-site parking facilities in Century City for rental, if necessary. Further, construction workers will be prohibited from using street parking spaces during the construction period.

E. PROJECT APPROVAL AND INTENDED USE OF THE EIR

This Environmental Impact Report (EIR) will serve as the environmental document for all Project approvals that may be subject to the California Environmental Quality Act (CEQA). These requested actions and approvals are expected to include, but may not be limited to the following list:

City of Los Angeles

(The following approvals may be required from the City of Los Angeles, including its component Department and Agencies):

- Major Project Conditional Use Permit by the Department of City Planning.
- Project Permit Compliance Review by the Department of City Planning.
- Building Permits and Code modifications if necessary, from the Department of Building and Safety.
- Haul Route Approval from the Building and Safety Commission.
- Street Improvement Permits from the Bureau of Engineering.
- Parking Facility Modification Approval by the Department of Building and Safety for tandem parking.

Figure PD-13 Artist Rendering of the Pedestrian Corridor

- Reduction of off-street parking spaces approval by the Department of City Planning.
- Intersection improvement and potential bus stop relocation approvals to facilitate pedestrian travel.
- Conditional Use Permit for alcohol service at restaurants.
- Other approvals, or permits necessary for the project, including, but not limited to, a vesting tentative tract map, parcel map or other subdivision, tree removal permits, conditional use permits, lot line adjustments, public works permits and variances.

Other

(The proposed Project may require additional approvals as follows):

- Federal Aviation Administration (FAA) Notice of Proposed Construction or Alteration.
- RWQCB discharge permits.
- Other approvals or permits necessary for the Project.

F. PROJECT OBJECTIVES

The 2000 Avenue of the Stars development proposal is designed to accomplish the following objectives, as provided by the Project applicant:

- 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.

IV. ENVIRONMENTAL SETTING

A. OVERVIEW OF ENVIRONMENTAL SETTING

The proposed 2000 Avenue of the Stars Project site is comprised of four parcels (two ground lots and two air space lots) totaling approximately 14.02 acres, situated southeasterly of the intersection of Avenue of the Stars and Constellation Boulevard. While the Project site encompasses the entire block bounded by Avenue of the Stars, Century Park East, Constellation Boulevard and Olympic Boulevard, redevelopment would be limited to a 9.2 acre portion.

Geographic Setting and Access

The Project site is located in Century City, which is situated in the Los Angeles basin on the southern side of the Santa Monica Mountains. Century City is located in West Los Angeles and is generally bounded by Santa Monica Boulevard to the north, Century Park West to the west, Pico Boulevard to the south, and the Beverly Hills/Los Angeles city limit to the east. The site and its vicinity are on relatively level terrain with a slight prevailing slope gradient towards the southwest. The site and surrounding area have been previously developed.

The Project site is currently developed with a six-level subterranean parking structure and four commercial buildings (the two eight-story buildings at 2020 and 2040 Avenue of the Stars and the two 44-story Century Plaza Towers at 2029 and 2049 Century Park East). A paved plaza area providing benches and a small flower garden is located between the two sets of buildings.

Regional access to the site is provided by nearby freeways consisting of the Santa Monica (I-10) Freeway, approximately one and three-quarter miles to the south, and the San Diego (Route 405) Freeway, located about two miles to the west. The Project site is a quarter-mile south of Santa Monica Boulevard, a major Los Angeles thoroughfare, which extends from Hollywood east of the Project site to Santa Monica and the Pacific Ocean, west of the site. Olympic and Pico Boulevards to the south provide additional regional access. Local circulation is provided by Constellation Boulevard, Century Park East, and Century Park West. There are no rail lines in the immediate site vicinity. Avenue of the Stars, which forms the western boundary of the site, is a designated scenic highway and bike path. Several bus lines serve Century City, with several bus stops within walking distance of the Project site (see Section V.M Transportation/Traffic).

Surrounding Development and Land Use

Land uses surrounding the site contain a mix of high-rise commercial office and residential buildings as well as mid-rise commercial and residential properties. The area of the immediate site vicinity is a mix of mid- to high-rise commercial offices, high-medium density residential development, hotels, shopping uses, and medical facility (**Figure ES-1**).

Commercial properties bound all of the western, northern, and eastern portions of the Project site. Surrounding the site are: the 39-story Fox Plaza building; 30-story St. Regis Hotel, 19-story Century Plaza Hotel; 39-story SunAmerica building, 22-story Watt Towers, and 44-story Century Plaza Tower buildings. The 38-story Constellation Place building, located west of the Project site on Constellation Boulevard, is currently under construction. The Century Club nightclub is directly north of the site. The Westfield Shoppingtown Century City (formerly the Century City Shopping Center) is located to the northwest.

Residential development is located primarily to the south of the Project site. Nearby development includes the Century Wood residential complex near Century Park West; Park Place condominium complex to the south; and the Century Park East condominium complex to the southeast.

Other land uses in the vicinity include Beverly Hills High School, Century City Medical Center, utilities, and an oil well to the east.

Figure ES-1 Surrounding Land Uses

Land Use Planning Setting

The City of Los Angeles General Plan guides land use planning within the City. Land use decisions and development are governed by the planning designations and policies contained within the West Los Angeles Community Plan and the Century City North Specific Plan (CCNSP), which are components of the General Plan.

The West Los Angeles Community Plan designates the site as Regional Commercial. Allowable uses within the Regional Commercial designation include commercial, office, retail, and residential.

The CCNSP is one of two Specific Plans that cover the Century City area (the other being the Century City South Specific Plan). The commercial area of the CCNSP is divided into “core” and “buffer” areas. The proposed Project is located within the core area, which allows for a floor area ratio of up to 6 to 1. Development is allowed within these commercially zoned areas when a proposed project does not contribute to a number of trips in excess of the existing use, or the amount allocated to the subject property if it is undeveloped or underdeveloped. Development may also occur if trips are transferred to the subject property in accordance with the CCNSP, or generated through a change in the existing use or demolition of existing buildings.

B. CUMULATIVE PROJECTS

In order to assess cumulative impacts as they relate to the 2000 Avenue of the Stars Project, a list of past, present and probable future projects (“Related Projects”) was developed (**Table IV-1**). The cumulative analysis contained in each environmental issue section of Section V. Environmental Impact Analysis, is based upon this list of Related Projects, taking into consideration any projects that might cause related or compounded impacts (see **Figure ES-2**).

Table IV-1
Related Projects List

Map No.	Size	Unit	Description	Location
1	770,000 21,000	sf sf	<i>Constellation Place</i> Office Retail	10270 Constellation Blvd.
2	2,000 296,700 1,500 191,900 95,000 N/A 1,000	beds sf spaces sf sf sf (net)	<i>University of California, Los Angeles</i> Southwest Campus Housing Northwest Campus Phase II Development Intramural Field Parking Structure Physics and Astronomy Building Luck Research Center, Thermal Energy Storage California NanoSystems Institute Center for Health Science Seismic Renovation, (demolition 1,679,000 sf, construction 1,680,000 sf, seismic repair of existing 965,000 sf.)	<i>UCLA Westwood Campus</i>

**Table IV-1 (Cont.)
Related Projects List**

Map No.	Size	Unit	Description	Location
3	0	sf (net)	Whole Foods supermarket (demolition 27,912 sf, construction 19,000 sf market and 8,912 sf storage)	1050 Gayley Ave.
4	115,000 350	sf du	<i>Palazzo Westwood</i> mixed use: commercial Apartments	1001 Tiverton Ave.
5	105	du	Condominium (Weintraub Project)	10804 Wilshire Blvd.
6	6	pu	Gas Station w/ Convenience Market	10991 Santa Monica Blvd.
7	74,653	sf	Office Building	11110 W. Pico Blvd.
8	N/A		Fast-Food Restaurant w/ Drive-thru	11021 W. Pico Blvd.
9	360,000	sf	Fox Studio Expansion (remainder est.)	10201 W. Pico Blvd.
10	14,800		High School Bldg Addition	9760 W. Pico Blvd.
11	42,000	sf	<i>Bais Chana High School</i> Private School	9051 W. Pico Blvd.
12	7,600	sf	Office	9350 Civic Center
13	74,000	sf	Office	331 N. Maple Dr.
14	168,000	sf	Office	407 N. Maple Dr.
15	34	du	Condominium	411 N. Oakhurst Dr.
16	64	du	Senior Housing	214-226 N. Clark Dr.
17	N/A		Convenience Market	145 S. Robertson Blvd.
18	34,000	sf	Cultural Center	469 N. Crescent Dr.
19	20	du	Condominium	137-147 Spalding Dr.

**Table IV-1 (Cont.)
Related Projects List**

Map No.	Size	Unit	Description	Location
20	5,000	sf	Retail	360 N. Rodeo Dr.
21	15,000	sf	Retail	339 N. Rodeo Dr.
22	28,300 16,700	sf sf	Office Retail	245-257 N. Canon Dr.
23	82,000 38,000	sf sf	Office Shopping Center	214-220 N. Beverly Dr. 203-221 N. Canon Dr.
24	80	du	Senior Housing	201 N. Crescent Dr.
25	16	du	Condominium	216-220 S. Arnaz Dr.
26	23	du	Condominium	143-149 N. Arnaz Dr.
27	32,000	sf	Medical Office	9100 Wilshire Blvd.
28	133	rm	Hotel	9200 Wilshire Blvd.
29	16	du	Condominium	132 S. Maple Dr.
30	152,646	sf	Retail/Office (Triangle Gateway)	Crescent Dr. & Wilshire Blvd.
31	10	du	Condominium	132 S. Crescent Dr.
32	41,500	sf	Office	233-269 N. Beverly Dr.
33	23	du	Condominium	261-283 S. Reeves Dr.
34	10	du	Condominium	345 S. Reeves Dr.
35	6	du	Condominium	338 N. Palm Dr.

**Table IV-1 (Cont.)
Related Projects List**

Map No.	Size	Unit	Description	Location
36	15,000	sf	Retail	421-427 N. Beverly Dr.
	15,000	sf	Office	
37	4,900	sf	Commercial/Retail	9000 Olympic Blvd.
38	2.5	miles	Santa Monica Blvd Transit Parkway Project	Santa Monica Blvd. between I-405 and Moreno Dr.
39	71,000	sf	Westfield Shoppingtown Century City	10250 Santa Monica Blvd.
40	-10,000	sf	<i>Flax</i> Commercial (demolition 16,100 sf, construction 6,100)	10852 Lindbrook Ave.
	19	du	Condominium	
41	85,367	sf	Office (demolition 9,633 sf, construction 95,000 sf)	Santa Monica Blvd. between Charleville Boulevard and Wilshire Blvd.
42	122,200	sf (net)	<i>Harvard Westlake Middle School Improvement Project</i> (24 net new students (current maximum enrollment is 766 students, new maximum enrollment will be 790 students), 15 classrooms/theatre)	700 N. Faring Road
43	6,711	trips	CCNSP Replacement Trips	Century City North Specific Plan Area
sf=square feet sf (net)=net square feet du=dwelling units pu=pumps trips=CATGP trips				

Figure ES-2 Related Projects Location Map

Included in the development attributable to past, present and probable future projects would be some development related to the unutilized Replacement Trips associated with the existing buildings that will be available for use in the Century City North Specific Plan (CCNSP) area (See **Section V.H** for discussion of Replacement Trips). Development rights for a property within the CCNSP are determined by the number of Cumulative Automobile Trip Generation Potential (CATGP) Trips assigned to or transferred to a parcel. Approximately 1,795 Phase I CATGP Trips and approximately 1,698 Phase II CATGP Trips remain unutilized¹⁰. New development is also permitted under the CCNSP to the extent that Trips have been transferred from other properties, or if Trips are created through the demolition of existing buildings creating Replacement Trips, as is the case with the subject Project. The demolition of the existing buildings results in a sufficient number of Replacement Trips to allocate to the new building and would result in a surplus of 6,711 Replacement Trips that could be transferred to some future project. For clarity, the future project(s) that could be engendered from these trips will be referred to as CCNSP Replacement Trips.

CCNSP Replacement Trips may be utilized at one or more sites in the plan area through the transfer procedures set forth in the CCNSP. All of these Trips are within the anticipated development (Trips) in the CCNSP and are currently being utilized. As such, they were planned for, and development associated with these Trips is a part of the local land use projections of the City of Los Angeles and part of the existing baseline. The CCNSP Replacement Trips (and impacts of the associated development) are currently in use as a part of the existing development on the site. The potential use of these trips is very limited. They must be used within the CCNSP area, and cannot be used in other jurisdictions or in other parts of Los Angeles. Further, any development utilizing these trips would, like the Project, be subject to the City of Los Angeles environmental review procedures, and appropriately analyzed and addressed under CEQA. It would be speculative to try to determine what projects might be engendered from these trips.

¹⁰ Century City Trip Allocation prepared by the City of Los Angeles Department of City Planning, October 2, 2001.

V. ENVIRONMENTAL IMPACT ANALYSIS

A. AESTHETICS

Aesthetic impacts for the Project have been evaluated under three general categories: 1) Visual Qualities, which addresses the general aesthetic value and view impacts relative to the surrounding neighborhood, 2) Lighting, which considers Project night-time illumination or glare impacts on the surrounding neighborhood, and 3) Shading, which evaluates daytime shading impacts resulting from construction of the Project.

1. Visual Qualities

The Visual Qualities analysis in this Section addresses the two issues of aesthetic character and alteration of views. Aesthetic impacts are evaluated in terms of the Project's visual compatibility with the surrounding environment, given scale, and image or character of the area. Views are addressed in order to determine if the Project would affect any valued public views. This evaluation takes into consideration the Project as described in Section III. Project Description, including approval of all Project entitlement requests, the demolition of existing structures, and the construction of the Project.

Existing Conditions

The Project site is located within the Century City North Specific Plan (CCNSP) area of the West Los Angeles Community Plan. The Century City North Specific Plan provides for a mixture of high-rise commercial offices, high-medium density residential development, hotels and shopping uses. The Specific Plan area is bounded by Santa Monica Boulevard to the north, by the boundary between the City of Los Angeles and Beverly Hills to the east, by Olympic Boulevard to the south, and by Century Park West to the west.

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. The existing site also contains a six-level parking facility below ground that provides parking for all the buildings on the site. In addition, the site includes two forty-four story office towers of triangular shape.

The rectangular street grid of Century City is not oriented along cardinal directions (north-south and east-west). Instead, Avenue of the Stars, Century Park East, and Century Park West are actually oriented in a northwest to southeast direction, however, for clarity these streets shall be hereafter referred to as running north to south. Similarly, Olympic, Santa Monica, and Constellation Boulevards will be hereafter referred to as aligned east to west when in actuality they are aligned northeast to southwest.

Land uses surrounding the site contain a mix of mid- to high-rise commercial and residential properties. A low-angle, oblique aerial photograph of the site vicinity illustrates the mix of building heights in the immediate site vicinity (**Figure AE-1**).

Residential structures are found along the entire southern side of Olympic Boulevard south of the Project site. These include the following complexes.

The Century Woods residential complex is located southwest of the proposed Project beyond the St. Regis and Century Plaza Hotels. The complex does not front along Avenue of the Stars but rather fronts along Olympic Boulevard and Century Park West.

Figure AE-1 Aerial View of the Project Site Looking Northeast

The Park Place condominium complex, located to the south of the Project consists of six (6) five-story structures. The buildings are tan in color with red tiled roofing. The complex has large trees and mature landscaping.

The Century Park East condominium complex is located southeast of the Project site at the corner of Century Park East and Olympic Boulevard. The complex consists of two rectangular-shaped high-rise buildings. The northern building has its longer side oriented towards Olympic Boulevard. The southern building is oriented towards Century Park East and setback from the street.

Commercial properties bound all of the western, northern, and eastern portions of the site (**Figure AE-2**). These include the following complexes.

The 44-story Century Plaza Towers located on the subject property and immediately east of the proposed area to be redeveloped are among the dominant features and visual focus of Century City. The towers are faced with tinted glass divided vertically by aluminum mullions. The towers nearly span the length of the block along Century Park East.

The 22-story Watt Towers are located to the north of the Project site. The complex consists of two high-rise office towers connected by a ground floor plaza area. The buildings are white in color and front onto Century Park East.

The 39-story SunAmerica building and its associated parking structure (1999 Avenue of the Stars) is located to the northwest, diagonally across the intersection from the Project site at Constellation Boulevard. The SunAmerica tower is faced with green and gold granite stone with dark tinted glass framed in gold toned aluminum frames. This building is generally rectilinear with a curved building front facing Constellation Boulevard and the Avenue of the Stars.

The 19-story Century Plaza Hotel is located west of the proposed Project on the opposite side of Avenue of the Stars. The curved hotel structure nearly spans the length of the block between Constellation Boulevard and Garden Lane.

The 30-story St. Regis Hotel is located on the west side of Avenue of the Stars north of Olympic Boulevard. The hotel lies southwest of the Project.

The 39-story Fox Plaza building, located immediately south of and adjacent to Olympic Boulevard, is another prominent modern high-rise building. It is surfaced with beige and brown-colored stone. The building fronts onto Avenue of the Stars.

Views in the Project area are dominated by urban features and not by any noteworthy natural terrain features. While the terrain is gradually sloping toward Santa Monica Boulevard along Avenue of the Stars, the grade change is not enough to materially affect the extent or content of viewsheds. Views of the site consist of and are limited by urban development concentrated in the commercial center that is Century City. Mature landscape trees located in surrounding building setback spaces, along Project-fronting streets, and in pedestrian plazas add to the obstruction of views of the Project site.

The aesthetic image and character of Century City is of a mixed-use center, with a prevailing contemporary architectural theme. The CCNSP does not identify any significant or “valued” scenic views or public vista points in the vicinity of the Project site. However, Avenue of the Stars is a City of Los Angeles designated scenic highway¹¹ and Class II bike path¹². Avenue of the Stars is aligned north

¹¹ Transportation Element of the City of Los Angeles General Plan Map E-Scenic Highways, Los Angeles Department of City Planning, June 1998.

¹² Transportation Element of the City of Los Angeles General Plan Map D-Non-motorized Transportation, Los Angeles Department of City Planning, April 1997.

Figure AE-2 Views of the Project Area

to south and is approximately 0.9 miles in length from Santa Monica Boulevard to Pico Boulevard. The character of the scenic corridor is cityscape. The cityscape environment consists of mid- and high-rise mixed-use buildings providing commercial, office, and residential space. The area includes dining, entertainment and shopping uses. Scenic amenities of Avenue of the Stars include landscaped medians, fountains, wide sidewalks, pedestrian bridge, natural and ornamental vegetation and views of the high- and mid-rise commercial structures (**Figure AE-3**). Public views of the site are available from immediately adjacent streets and sidewalks. These views are not available from long distances, due to intervening buildings, as will be described later in this section.

Threshold of Significance

Using the City Thresholds Guide, along with the current CEQA Checklist (Appendix G of the CEQA Guidelines) the following thresholds addressing aesthetics (visual character) and views (scenic views or vistas) have been determined to be applicable to the Project.¹³ The proposed Project would result in a significant impact if it were to:

- Create a demonstrable negative aesthetic effect or substantially degrade the existing visual character by eliminating valued open space or a valued visual resource or by introducing a visual element incompatible, out of scale, in great contrast, or out of character with the surrounding area and its valued aesthetic image or character; and/or
- Substantially obstruct, block or intrude into a valued public view or provide a visual element that would considerably deter from a valued public view.

Project Impact

Aesthetic Character

This portion of the analysis addresses part one of the significance threshold, evaluating whether the proposed Project would degrade the existing aesthetic character of the area and/or otherwise result in a demonstrable negative aesthetic effect. To make this determination, the value of existing on-site development is first assessed to determine whether removal of these uses would result in a “demonstrable negative effect or substantially degrade the existing visual character.” Next, replacement with the proposed Project structures and uses is assessed to determine if they would introduce “a visual element incompatible, out of scale, in great contrast, or out of character with the surrounding area and its valued aesthetic image or character.”

Value of Existing Structures and Public Spaces

The subject property is currently developed with a commercial complex that includes office buildings, theaters, restaurants, and retail and health club space. These uses are contained within two eight-story buildings at 2020 and 2040 Avenue of the Stars and the two 44-story Century Plaza Towers at 2029 and 2049 Century Park East. A 3-acre plaza is located between the two sets of buildings. 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 or significant, these structures are visually consistent with and in character with the surrounding area.

¹³ City of Los Angeles Draft CEQA Thresholds Guide, May 14, 1998, City of Los Angeles Environmental Affairs Department (EAD). The Draft LA CEQA Threshold Guide is recommended by EAD as guidance to all City Departments in the preparation of environmental documents for new private development projects. The Guide states that for aesthetics and views, the determination of significance shall be made on a case by case basis, considering certain factors. The project Threshold of Significance takes into consideration, applicable factors in the Guide, as well as CEQA Guidelines Appendix G, which has been updated since issuance of the Threshold Guide.

Insert Figure AE-3 View Along Avenue of the Stars

The Century Plaza Towers are among the dominant features and visual focus of Century City. The towers are faced with tinted glass divided vertically by aluminum mullions. The towers nearly span the length of the block along Century Park East. While located on the subject property, the Project does not propose to remove or modify these buildings.

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 or significant, the plaza is aesthetically consistent with the surrounding area.

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

Value of Replacement Structures and Public Spaces

The proposed 2000 Avenue of the Stars Project is a commercial mixed-use 15-story building of contemporary style architecture. The Project would provide class “A” office, retail, restaurant, and cultural space. The plaza level of the Project would contain all of the Project’s retail and restaurant space, representing 6.3% of the overall Project’s floor area. The street-level of the project would contain the office lobby, some office tenant space and a cultural facility. The 13 floors above the street level would provide office space. The Project would not include rooftop signage or other signage feature not typically found in Century City. All signage would be in compliance with City code. For a complete description of the Project site plan and its associated features, refer to Section III, Project Description.

Consistent with the architectural style common throughout Century City, the design of the proposed 15-story Project would be clean and modern in style, utilizing glass and steel as major materials. The Project incorporates the unique design element of a central opening in the structure. This design element gives the structure a landmark presence. The large opening is created by spanning between the two ends of the building at the upper and lower levels. From street level on Avenue of the Stars, this rectangular, open-air space would frame views of the two triangular Century Plaza Towers in the background. This detailing, along with perimeter landscaping and the enhanced landscaped plaza, would be utilized to soften building edges, avoiding a blank, boxy look. The architectural design of the Project is consistent with the existing aesthetic image and character of Century City, and therefore, would not represent a negative aesthetic effect.

The existing paved plaza would be replaced with a diamond shaped central lawn area, flanked by jacaranda and poplar trees along the northwest and southern edges. Additional rows of jacaranda trees would be planted between the lawn and the restaurant use on the north side of the Project. Pine trees would be planted on the slopes to the south and east of the cultural facility and on the east and west sides of the garage access from Constellation Boulevard. A pedestrian promenade would direct guests from Avenue of the Stars through the site, passing by benches, sitting areas, gardens, canopy trees, courtyards, and grassy slopes.

Project implementation would remove some landscape elements including all vegetation within the area to be redeveloped. Site investigations have identified a total of 113 trees that would be removed during construction. Of these, sixty-seven are mature trees with trunk diameters of twelve inches or greater. Forty-six have trunk diameters of less than twelve inches. The majority (nearly seventy-five percent) of trees to be removed are either ornamental fig trees (*Ficus sp.*), laurelleaf snailseed (*Cocculus laurifolius*), and London plane (*Platanus acerifolia*) trees. The specific number of each tree

species to be removed is shown in Section V.C. Other trees to be removed include: Canary Island pine (*Pinus canariensis*), Brazilian pepper trees (*Schinus terebinthifolius*), evergreen pear trees (*Pyrus kawakamii*), goldenrain (*Koelreuteria paniculata*), coast redwood (*Sequoia sempervirens*), sweet gum (*Liquidamber styraciflua*), sweetshade (*Hymenoporum flavum*), and Chinese flame (*Koelreuteria bipinnata*).

Replacing this vegetation would be a diamond-shaped central lawn area, flanked by jacaranda and poplar trees along the northwest and southern edges. Additional rows of jacaranda trees would be planted between the lawn and the restaurant on the north side of the Project. Pine trees would be planted on the slopes to the south and east of the cultural facility and on the east and west sides of the garage access from Constellation Boulevard.

The loss of mature ornamental vegetation is a potentially significant impact. However, the Project includes a landscaping program which would expand the Project's landscaped areas and mitigate this impact to a less than significant level.

The Project's scale was also evaluated in relation to the surrounding area, in order to further assess visual character. The Project elevations and cross-sections in Section III, Project Description, **Figures PD-4 and PD-5** are helpful in this evaluation. The proposed 15-story structure would have an approximate height of 215 feet above grade at the plaza level, and 201 feet above grade on Avenue of the Stars. Two of the Project's 15 levels would be below grade at Avenue of the Stars.

A high-angle oblique aerial photographic simulation of the proposed building in the core of Century City allows a visual examination of the urban context of the Project's surrounding conditions (**Figure AE-4**). The illustration shows the proposed 15-story building in relationship to nearby high-rise structures. As illustrated, buildings of similar or much larger size would surround the proposed structure. The Project is of similar height to the nearby Century Plaza Hotel and shorter than the Watt Towers to the north and considerably shorter than the 44-story Century Plaza Towers to the east. In the foreground both the 39-story SunAmerica building, and 30-story St. Regis hotel are much taller than the proposed building. There are also many commercial and residential structures taller than the Project in the vicinity (not depicted in the figure). These include high-rise buildings such as the Fox Plaza building, the twin Century Park East condominiums and the under construction Constellation Place. In the context, the Project would be compatible with surrounding development.

In summary, the proposed Project site forms a part of a completely urbanized landscape in the heart of Century City. The existing eight-story structures and the adjacent open-air landscaped pedestrian plaza help to contribute to the local quality and character of the urban environment. The proposed single 15-story structure on a redesigned footprint would have a slightly greater setback from the Avenue of the Stars and present a narrower building profile facing Constellation Boulevard than the existing structures. The proposed landscaped plaza would be larger, include less hardscape and provide more access from the perimeter of the site. The design of the proposed building features openings at street-level and from lower to mid-level floors that would preserve visual links to the interior plaza and the Century Plaza Towers from Avenue of the Stars. The surface treatments, height, and visual massing effect of the completed structure and plaza would be in character with the surroundings and would not result in a degradation of the visual qualities or character of the site and surroundings.

Portions of nearby buildings such as the SunAmerica, Century Plaza Hotel, St. Regis Hotel, Park Place Condominiums, Century Park East Condominiums, and Watt Towers would have views of the construction related activities of the Project. Temporary visual impacts at the site would occur during the redevelopment process as they relate to construction activities and the removal of mature site-perimeter trees from existing landscaped areas that are part of the Project. Perimeter landscaping is also planned for the Project site.

Insert Figure AE-4 Photosimulation of the Proposed Project

The scope of the proposed Project, when viewed within its urban setting would be consistent with, and in scale with the surrounding development. The loss of mature on-site vegetation has the potential to significantly affect the visual character and quality of the site. Incorporation of mitigation measure AE-1 would reduce potential impacts to less than significant levels. Incorporation of mitigation measure AE-2 is included to further reduce potential impacts to the visual character and quality of the site.

Alteration of Views

This portion of the analysis addresses part two of the significance threshold, evaluating whether the Project would “substantially obstruct, block or intrude into a valued public view or provide a visual element that would considerably deter from a valued public view.” The CCNSP does not identify any significant or “valued” scenic views or public vista points in the vicinity of the Project site. However, Avenue of the Stars is a City of Los Angeles designated scenic highway and Class II bike path. Avenue of the Stars is aligned north to south and runs from Santa Monica Boulevard to Pico Boulevard. The character of this scenic corridor is cityscape and the aesthetic image includes scenic amenities such as landscaped medians, fountains, wide sidewalks, pedestrian friendly environments, ornamental vegetation, and views of the high- and mid-rise Century City commercial structures. This section will evaluate the degree to which current public views of the Project site are altered, and whether such alteration is in keeping with the “valued character” of Century City.

For this analysis, two different visual studies were undertaken; photorealistic simulations of the proposed Project, and a 3D digital terrain model analysis of the surrounding area.

For the simulations, photographs were taken from the surrounding area, and architectural renderings of the Project were placed into those photographs to simulate future views. The photographs include surrounding buildings to give context to the analysis. The new Project was modeled by Gensler Architects, based upon the Project plans.

The 3D digital terrain model analysis compared the changes in Project site visibility resulting from the proposed development within the context of the surrounding buildings. The analysis was prepared by Horizon Surveys based upon their collected data as will be discussed below.

Northerly View of the Project

The view of the proposed Project looking north from the intersection of Avenue of the Stars and Olympic Boulevard is demonstrated in **Figure AE-5**. The southern boundaries of the site border on a landscaped area containing a number of large mature trees. On all sides, the property abuts existing developed parcels, some with taller commercial buildings, forming relatively contiguous development along the street frontage on Avenue of the Stars.

West of Avenue of the Stars, buildings visible in the photograph are the Fox Plaza building, a small portion of the Century Plaza Hotel (behind the mature trees near Fox Plaza), and the SunAmerica building. Crossing Avenue of the Stars in the distance, the 1900 Avenue of the Stars, 10100 Santa Monica Boulevard, and 1801 Century Park East buildings are visible. East of the 2020 and 2040 Avenue of the Stars buildings are the Century Plaza Towers and a small portion of the Century Park East condominium tower.

In the simulated future view, the Project would remove the existing street frontage from the Project site and replace with a single taller building. The new building would be shorter than many of the surrounding buildings and of a design compatible with the SunAmerica, Fox Plaza, and Century Plaza Tower buildings in its architectural style and its design elements and detailing. As seen from this vantage point, the proposed Project would be visually compatible in terms of height and massing

Insert Figure AE-5 Photosimulation of the Proposed Project Looking North from Avenue of the Stars and Olympic Boulevard

with existing surrounding development. The future views from this angle would be in keeping with the valued character of Century City, and no significant view impact would occur.

Southerly View of the Project

The view of the proposed Project looking southerly from the pedestrian bridge, (which is elevated over Avenue of the Stars south of Santa Monica Boulevard) is demonstrated in **Figure AE-6**. The northern boundary of the site runs adjacent to Constellation Boulevard (the left turn lane is visible).

Just north of Constellation Boulevard is the City National Bank building at 1950 Avenue of the Stars. The large Charles Schwab office building at 1900 Avenue of the Stars is visible in the foreground at the left of the photograph. In the foreground on the right side of the photograph is the 1901 Avenue of the Stars office building. The Century Plaza Towers are located immediately east of the existing buildings. One of the Century Park East condominium buildings is visible in the gap between the two towers. West of Avenue of the Stars, the SunAmerica building and St. Regis Hotel can be seen. In the distance the Century Towers residential complex can be seen.

In the simulated future view, the Project would remove the existing street frontage from the Project site and be replaced with a single taller building. As seen from this vantage point, the proposed Project would be visually compatible in terms of height, massing and architectural design with existing surrounding development. The future views from this angle would be in keeping with the valued character of Century City, and no significant view impact would occur.

View Blocking Impacts from Surrounding Development

The 3D digital terrain model analysis compared the changes in Project site visibility resulting from the proposed development within the context of the surrounding buildings. The analysis included the preparation of a digital terrain model of the existing site and surrounding quarter mile radius. The model extracted locations and heights for all buildings, streets, and some trees within the study area into a three-dimensional computer-aided drafting drawing. In the model, viewpoints were analyzed from the roofline of the existing and proposed buildings. Roofline viewpoints represent the "worst case" in terms of increased building visibility over existing conditions. Visibility analysis was performed for each of the viewpoints and combined. The results were mapped onto rectified aerial photography (**Figure AE-7**). Blue shading in the figure represents areas with views of the existing structures. Purple shading represents areas which do not have views of the existing structures but would have views of the proposed building. Because the model is based primarily on terrain relief and building heights and locations, and does not include walls, or landscaping, site visibility in both cases is overstated.

The visual analysis 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 "channeled" 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.

Upper floors of Project-facing buildings in the Park Place condominium complex would gain views of the proposed building. The buildings that front Olympic Boulevard and are closest to the Project site tend to block or limit views of the Project site from adjacent buildings located toward the interior of the complex. In views where the Project may be seen, the building would be immediately flanked by the 44-story Century Plaza Towers to the east and be backed by the 39-story SunAmerica building.

Upper floors of Project-facing buildings in the Century Woods residential complex may gain intermittent views of the Project between the "gap" formed by the St. Regis and Century Plaza Hotels.

Insert Figure AE-6 Photo simulations of the Proposed Project Looking South from Avenue of the Stars

Insert Figure AE-7 Comparison of Visibility of Existing and Proposed Structures

The residential structures are clustered throughout the development in such a manner that many buildings located adjacent to others block any potential views of the site. Buildings closest to the development's perimeter and others facing internal street and common areas may have potential views of the site.

In summary, 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 high- and mid-rise structures that surround the Project site serve to block many views of the existing and proposed buildings. The proposed Project would be of a height and bulk consistent with such views, and constructed of materials appropriate for the modern urban landscape of Century City. The future views of the Project site would be in keeping with the valued character of Century City, and no significant view impact would occur.

Mitigation Measures

Incorporation of mitigation measure AE-1 would reduce the Project's potential aesthetic character impacts to less than significant levels. Incorporation of mitigation measure AE-2 is included to further reduce these impacts.

- AE-1** All open areas not used for buildings, driveways, parking areas, or walkways shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the Los Angeles Department of City Planning.
- AE-2** The owners shall maintain the Project site to be clean and free of debris and rubbish and promptly remove any graffiti from walls, pursuant to Municipal Code Sections 91.810F, 91.8904.1, and 91.1707-E.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts after the implementation of mitigation measures.

Cumulative Impacts

The proposed Constellation Place project located at the corner of Century Park West and Constellation Boulevard, would be visible in some of the same views as the proposed Project. These views would be limited, because of the size of the new building and the presence of the Century Park Hotel which is located between the two buildings, to pedestrians and motorists traveling on Constellation Boulevard. The taller buildings which surround the proposed building, of which the currently under construction 38-story Constellation Place building is one, serve to block views of or from the Project site. No other related projects are located close enough to the Project site to cumulatively contribute to the Project's overall less than significant after mitigation aesthetic impact, or to the Project's alteration of view impacts, which are less than significant in any case. Therefore, no significant cumulative impact on aesthetic character or alteration of views would occur.

2. Lighting and Glare

The Lighting and Glare analysis in this Section addresses the two issues of nighttime illumination and reflected light (glare). Nighttime illumination impacts are evaluated in terms of the Project's net change in ambient lighting conditions and proximity to light sensitive land uses. Reflected light impacts are analyzed to determine if Project related glare would create a visual nuisance or hazard.

Nighttime lighting of varying intensities with a potential for glare of reflected light are characteristic of locations throughout Century City. The impact of nighttime lighting depends upon the type of use affected, the proximity to the affected use, the intensity of specific lighting, and the background or ambient level of the combined nighttime lighting. Nighttime ambient light levels may vary considerably depending upon the age, condition, and abundance of point-of-light sources present in a particular view. The use of exterior lighting for security and aesthetic illumination of architectural features may contribute substantially to ambient nighttime lighting conditions.

Spill-over of light onto adjacent properties has the potential to interfere with certain activities including vision, sleep, privacy and general enjoyment of the natural nighttime condition. Light sensitive uses include residential, some commercial and institutional uses and, in some situations, natural areas. Changes in nighttime lighting may become significant if a proposed project increases ambient lighting conditions beyond its property line and project lighting routinely spills over into adjacent light-sensitive land use areas.

Reflective light (glare) is caused by sunlight or artificial light reflecting from finished surfaces such as window glass, or other reflective materials. The reflectivity of glass can have many different reflectance characteristics. Generally, darker or mirrored glass would have a higher visible light reflectance factor than clear glass. Buildings constructed of highly reflective materials from which the sun reflects at a low angle commonly cause adverse glare. Reflective light is common in urban areas.

Existing Conditions

Nighttime Illumination

The Century City area, including the Project site, is generally brightly illuminated at night. The ambient nighttime lighting condition in the immediate Project vicinity is created by a combination of lighting types and sources, including street lights, security lighting, illuminated restaurant and other retail business signs, architectural illumination, and spillover lighting from the interiors of towering commercial and residential buildings, traffic signals, and the glow of moving vehicle lights on public streets.

Century City is heavily populated by high- and mid-rise commercial structures. The majority of these structures are well lit for both security and aesthetic purposes. The nearby 44-story Century Plaza Towers, 30-story St. Regis Hotel, 19-story Century Plaza Hotel, 39-story Fox Plaza, 22-story Watt Towers, and 38-story Constellation Place (once construction is completed) are all significant illumination contributors.

With respect to the proposed Project site, 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 and faces the Century Plaza Hotel, 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.

Commercial properties in the Project vicinity benefit from the added incidental nighttime illumination in terms of security of property and patrons. Uses in the Project area that may be

considered sensitive to nighttime light are: the Park Place condominiums to the south; Century Woods residential area to the southwest; Century Plaza Hotel to the west; St. Regis Hotel to the southwest and Century Park East condominiums and Century City Hospital to the east.

Glare

The existing 2020 and 2040 Avenue of the Stars buildings are constructed of travertine, a low-reflective stone covering. The existing structures do not reflect light in amounts sufficient to be considered either a hazard or visual nuisance. The mature landscaping that borders the site further reduces the effects of glare.

Threshold of Significance

The City of Los Angeles Draft CEQA Thresholds Guide (1998, p. L.4-2), with reference to findings of significance involving night lighting states, "... the determination of significance shall be made on a case by case basis, considering the following factors:

- The change in levels of ambient illumination as a result of Project sources; and
- The extent to which Project lighting would spill off the Project site and effect adjacent light-sensitive areas."

The City of Los Angeles Draft CEQA Thresholds Guide does not identify a threshold of significance involving reflected daytime lighting. However, the Los Angeles Department of City Planning has accepted that a determination of significant impact resulting from glare would occur if a project "would produce glare which would create a visual nuisance, or a hazard, as it distracts or interferes with vision and concentration, or results in differential warming of adjacent residential properties."¹⁴

Project Impacts

Nighttime Illumination

The proposed Project would change the land uses of the site and its nighttime appearance. The nighttime entertainment uses currently on the site would be eliminated and replaced by Project office facilities, which primarily generate activity during the day. The two existing eight-story buildings would be replaced by a single 15-story structure with a similar footprint. The new building would be oriented such that its longer side would run parallel to Avenue of the Stars.

The Project would retain retail and restaurant uses at the plaza level and would devote space on the street level to a cultural facility. The remaining floors would be dedicated to office space. As currently exists, vehicles exiting the parking structure would direct light out onto adjacent sidewalks and streets. The Project would remove some peripheral landscaping. For both aesthetic and energy conservation reasons, interior lights would be automatically controlled by sensors and timers to reduce usage after hours. The Project would provide additional perimeter landscaping to replace any removed vegetation. This landscaping would partially shield illumination from the plaza.

The illumination of the office building may contribute to the overall perceived "glow" of the site. Illumination from the proposed Project is not likely to affect the Century City Hospital and the Century Park East condominiums due to distance and the presence of the 44-story Century Plaza Towers which are located generally between the proposed building and these uses. Similarly, the Century Woods residential area is unlikely to be adversely affected by nighttime illumination due to distance and the intervening presence of both the St. Regis and Century Plaza Hotels. Portions of the Century Plaza Hotel, St. Regis Hotel and Park Place condominium complex buildings, which front toward the Project site, would be exposed to nighttime illumination from the Project area. The

¹⁴ Century Project Environmental Impact Report, City of Los Angeles, October 1996.

proposed uses, distance to the proposed structure, and incorporation of proposed design features, would serve to reduce illumination effects. In the short term, elimination of vegetation for construction access may increase the lighting that would be visible from the Park Place condominiums. Without mitigation, this impact would be potentially significant. In the long run, illumination from the site would increase resulting in adverse but not significant impacts. However, this determination assumes no unusual lighting conditions or features. Without additional measures assuring this, the Project could adversely affect adjacent light sensitive areas of the Century Plaza Hotel, St. Regis Hotel and Park Place condominium complex.

Glare

Depending on the final building materials, the proposed building might increase glare and reflectivity from the site. The existing stone-covered buildings would be replaced by a taller building utilizing glass and metal cladding as major materials.

Reflected sunlight from the proposed building can be a problem to motorists when the sun is close to the horizon, allowing reflected glare to interfere with a driver's vision. Consequently, glare impacts may occur during morning and early evening hours when the sun is near the horizon. Potentially affected road segments would include portions of Olympic and Constellation Boulevards and Avenue of the Stars. The Project's impact would vary by season and time of day and is of short duration, which without mitigation (such as use of non-mirrored glass) could result in a significant impact.

Reflective glare from sunlight can, in extreme instances, generate minor fluctuations in the local microclimate proximate to the source of the glare. Specifically, reflected glare may cause some differential warming of directly adjacent properties. This warming is sometimes unwelcome during summer months by residential uses where persons are present in and out of doors for extended periods of time and often lack the refuge of air conditioned environs. The nearest residential area is the Park Place condominium complex located across Olympic Boulevard from the Project site. Given that the complex is not located directly adjacent to the proposed building, and that the use of non-reflective materials would be required as mitigation for visual glare impacts, no significant glare-induced warming of adjacent residential areas is anticipated.

Mitigation Measures

The following measures will eliminate any potential for significant impacts due to Project lighting.

Nighttime Illumination

- AE-3** Exterior lighting shall be designed to shield and direct illumination to the Project site, and/or areas which do not include light-sensitive uses.
- AE-4** The Project shall not install flashing, moving, strobe, or blinking outdoor lights along the western and southern boundaries of the Project site or on the south-facing exterior wall of the proposed building.
- AE-5** Landscape plans shall utilize large canopy trees particularly along the southern perimeter of the Project site to the extent feasible.

Glare

- AE-6** The exterior of the proposed building shall be constructed of materials such as high-performance tinted non-mirrored glass, painted metal panels and pre-cast concrete or fabricated wall surfaces.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts after the implementation of mitigation measures.

Cumulative Impacts

The proposed Constellation Place project located at the corner of Century Park West and Constellation Boulevard, is to be constructed of low reflective building materials. The building would not utilize mirrored glass or other highly reflective exterior coverings. Glare from the Constellation Place building will be directed towards portions of Century Park West and Constellation Boulevard. However, it was determined that with mitigation restricting the use of high reflective exterior materials, any adverse impact would be reduced to a less than significant level. Additionally, none of the same roadway segments would be affected. Therefore, the Constellation Place building would not cumulatively contribute to the Project's less than significant impacts after mitigation. No significant cumulative impact would occur.

3. Shading

The effects of shading by one building upon another can be either positive or negative depending upon the site-specific circumstances of the properties involved. A potential benefit of shading for adjacent structures may be a cooling effect gained during warm weather. Negative consequences of shading include the loss of natural light for passive or active solar energy applications or the loss of warming influences during cool weather. Factors influencing the relative impact of shadow effects are site-specific and include differences in terrain elevation between involved properties, the height and bulk of structures, the time of year, the duration of shading in a day, and the sensitivity of adjacent land uses to loss of sunlight.

Shadows cast by structures vary in length and direction throughout the day and from season to season. Shadow lengths increase during the "low sun" or winter season and are longest on December 21-22, the winter solstice. The winter solstice, therefore, represents the worst-case shadow condition and the potential for loss of access to sunlight that a project could cause is greatest. Shadow lengths are shortest on June 21-22, the summer solstice. Shadow lengths on the spring and fall equinoxes, March 20-21 and September 22-23 respectively, would fall midway between the summer and winter extremes.

Shadows are cast to the west by objects during the morning hours when the sun is coming up on the horizon in the east. During late morning and early afternoon the shadows of objects move northerly and by late afternoon they are cast easterly in response to the apparent movement of the sun across the sky from east to west. Shadows cast in winter are longer, and those at the winter solstice the longest. It is instructive, therefore, to map the daily shadow pattern cast by a proposed building on December 21st because it is illustrative of the "worst case" impacts a proposed structure may have upon nearby sensitive land uses.

Of the total amount of the sun's energy available during a daylight period, approximately 85% of it reaches the earth between 9:00 a.m. and 3:00 p.m. The California Energy Commission defines this time period as the useable solar sky-space.¹⁵ Useable sky-space, at the winter solstice, is that portion of the sky lying between the position of the sun (i.e., sun angle or azimuth) when it is 45 degrees to either side of true south—the portion of the sky covered or traversed by the sun between 9:00 a.m. and 3:00 p.m. For either an active or passive solar energy system to work it is not necessary for it to be exposed to sunlight from sunrise to sunset.

Land uses are considered sensitive when sunlight is important to function, physical comfort, or the conduct of commerce. Facilities and operations identified as potentially sensitive to the loss of sunlight include: "...routinely usable outdoor spaces associated with residential, recreational, or institutional (e.g., schools or convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar energy collectors."¹⁶

To determine shading impacts of the existing and proposed Project structures, their shadow lengths were calculated and their patterns projected in plan view on site vicinity maps showing the location of surrounding buildings. Although not required by the stated thresholds (as discussed below), both winter and summer solstice shadow patterns were examined to document the full (high to low) range of shadow impacts on adjacent land uses and to promote a full understanding of the Project's impacts, or lack thereof. The Project's shadow analysis is included in **Appendix 2** to this document.

15 Solar Access: A Guidebook for California Communities, March, 1980, p. 11.

16 City of Los Angeles Draft CEQA Thresholds Guide, May 14, 1998, City of Los Angeles Environmental Affairs Department (EAD), p. L.3-1. This document is recommended by EAD as guidance to all City Departments in the preparation of environmental documents for new private development projects.

Existing Conditions

The Project site is centrally located within the Century City North Specific Plan Area and would be located at 2000 Avenue of the Stars on the block bound by Avenue of the Stars, Constellation Boulevard, Century Park East, and Olympic Boulevard. The Project site has two existing eight-story structures located at 2020 and 2040 Avenue of the Stars and the two 44-story Century Park Towers. As discussed above (Section V.A.1) the existing buildings are situated among existing mid-rise and high-rise commercial office and hotel buildings that are considerably taller.

The 19-story Century Plaza Hotel is located on the southwestern side of the Avenue of the Stars opposite the proposed Project site. Commercial properties abut or lie along streets on three sides of the Project site (to the southwest, the northwest and the northeast). Complex shadow patterns are created in this urban setting when the shadows cast by the existing buildings in the Project vicinity coalesce.

Winter Solstice (December 21-22)

In the morning hours existing structures cast shadows in a northwesterly pattern that parallels the streetscape areas along the eastern side of the Avenue of the Stars. When the morning shadows are longest they shade both sides of Constellation Boulevard and portions of the Century Club, a two-story restaurant, on the opposite side of the street. The 2040 Avenue of the Stars building shades the open court area between the structures from the morning hours until early afternoon. In the afternoon the existing structures cast shadows northeasterly into the plaza area between the buildings and the Century Plaza Towers (**Figure AE-8**). Shadows cast by the existing buildings are completely contained within the Century City North Specific Plan area. No residential areas are affected at any time of day.

Summer Solstice (June 21-22)

During the summer solstice the sun travels more directly overhead than at any other day of the year with the result being that shadow directions and lengths are changed considerably. Shadows cast by objects in early mornings and late evenings fall more directly to the east and west. Shadows at the summer solstice will also be the shortest of the year

At the summer solstice, shadows cast by the existing eight-story buildings are substantially shorter than at the winter solstice. Shadows reach but do not significantly enter into either Constellation Boulevard or Avenue of the Stars. The day's shadows are also short enough that the open court area between the two existing structures is only partially shaded during the morning and late afternoon hours (**Figure AE-9**). Shadows cast by the existing buildings are completely contained within the Century City North Specific Plan area. No residential areas are affected at any time of day.

Threshold of Significance

Regulation of the duration and amount of shading a proposed Project may generate is addressed by the City of Los Angeles Draft CEQA Thresholds Guide and also in the City's area plans and specific plans. The City of Los Angeles Draft CEQA Thresholds Guide provides general guidelines for determining whether a Project impact would be considered significant:

“...shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time (between early April and late October).”¹⁷

¹⁷ City of Los Angeles Draft CEQA Thresholds Guide, May 14, 1998, City of Los Angeles EAD, p. L.3-3.

Insert Figure AE-8 Existing Shadow Pattern – December 21-22 (Winter Solstice)

Insert Figure AE-9 Existing Shadow Pattern – June 21-22

The Century City North Specific Plan contains specific, more restrictive provisions for urban development within the Plan area that may cast shadows into residential neighborhoods along its boundaries. The Century City North Specific Plan addresses concerns about building shading upon potentially sensitive residential uses by ordinance. The Specific Plan Ordinance states that a proposed project must be designed in a way:

“...to reasonably assure that it (the proposed project) will not cast a shadow for more than two hours, between 8:00 A.M. and 8:00 P.M., upon any detached single-family dwelling located outside the Specific Plan Area.”

The Specific Plan criterion narrows the impact to a two-hour time period. Because the Specific Plan requirements are more restrictive than the general Thresholds Guide, it provides the applicable threshold of significance for the proposed Project.

Project Impacts

The Project would remove the two existing eight-story structures and develop a single 15-story office building. The proposed Project would be constructed within the same general footprint of the two existing structures. The proposed structure would have its longer axis facing the Avenue of the Stars. The plaza located between the Century Plaza Towers and the proposed Project would be reconfigured and have a more open design. The proposed building would rise to mirror the Century Plaza Hotel in height on the opposite side of the Avenue of the Stars.

Winter Solstice (December 21-22)

The proposed structure's winter solstice shadows would cover a greater distance on the ground throughout the day than existing conditions. In the mornings, shadows would extend northwesterly beyond Constellation Boulevard to shade the City National Bank building north of Constellation Boulevard at 1950 Avenue of the Stars. By 9:00 am, Project shadows would reach the landscaped area and open court areas on the south side of the Charles Schwab office building at 1900 Avenue of the Stars. Late morning Project shadows would shorten substantially and fall within undeveloped space north of Constellation Boulevard and the Century Club. At noon the Century Club would be shaded, as would a portion of the plaza between the Project and the Century Plaza Towers. By 3:00 p.m. the plaza between the Project and the Century Plaza Towers would be in shadow that would reach the lower, westerly-facing sides of the Towers (**Figure AE-10**).

The winter solstice shadow pattern cast by the proposed Project would be contained completely within the central commercial landscape of the Century City North Specific Plan Area. No residential areas would be affected by Project shadows at any time of day.

Summer Solstice (June 21-22)

At the summer solstice the shadows of the proposed Project would be considerably shorter at all times of day than during the winter solstice. Morning (9:00 am) shadows would be cast westerly to shade the eastern side of the Avenue of the Stars. The overall shadow length would be reduced to the extent that it would no longer shade the City National Bank building, nor would it shade the Century Club at any time of day. In the afternoon (3:00 p.m.) Project structure shadows would extend easterly into open and landscaped areas of the Project. The plaza between the Project and the Century Plaza Towers would also remain sunny for most of the afternoon until later in the day as shadows gradually extend farther east into the plaza area (**Figure AE-11**).

Insert Figure AE-10 Proposed Project Shadow Pattern – December 21-22 (Winter Solstice)

Insert Figure AE-11 Proposed Project Shadow Patern June 21-22 (Summer Solstice)

In summary, the proposed fifteen-story Project would be taller than the existing eight-story buildings and the Project's shadows would be correspondingly longer at all times of the year. The proposed building footprint, however, would not be as wide in an easterly direction. The result of the adjusted footprint is that the effect of the added building height would not be manifested in as wide-spread an area being shaded in the afternoons, over that already shaded by existing structures, as might have been anticipated.

Winter and summer solstice proposed Project shadows would be completely confined to the interior commercial landscape of the Century City North Specific Plan Area, an area containing numerous mid- and high-rise commercial buildings.

The closest area of residential land use is located southeasterly of the site on the opposite side of Olympic Boulevard and its interchange with the Avenue of the Stars. This multi-tenant residential area would not be affected by shadows from the proposed Project as it is located north of the residential units and prevailing angles of sunlight are from the south in all seasons at this latitude.

No Project shading of residential land uses either inside or outside of the above Specific Plan Area would occur.

Mitigation Measures

Based on stated thresholds of significance, no significant shadow impacts would occur. Therefore, no mitigation measures are required or recommended.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

The proposed 38-story Constellation Place building located at the corner of Century Park West and Constellation Boulevard, will cast long shadows that will shade areas that will also be affected by shadows cast by the proposed Project. However, the areas they shade in common are all commercial properties within the Century City North Specific Plan, and not residential areas outside the Specific Plan area. Further, these shadows would occur from Constellation Place with or without the proposed Project. No significant cumulative impact would occur. No other related projects are located close enough to the Project site to cumulatively contribute to the Project's overall less than significant shadow impacts. Therefore, no significant cumulative impact on shadows would occur.

B. AIR QUALITY

1. Emissions

This Section is based upon the Air Quality Assessment prepared by Mestre Greve Associates, dated June 25, 2002 (**Appendix 3**). Project traffic data utilized to assess the Project's mobile source air quality impacts was obtained from the Project traffic study, generated by Crain & Associates (**Appendix 18**).

Existing Conditions

Environmental Setting and Meteorology

The Project falls within the South Coast Air Basin (Basin). The climate in and around the Project area, as with all of Southern California, is controlled largely by the strength and position of the subtropical high pressure cell over the Pacific Ocean. The cell maintains moderate temperatures and comfortable humidity, and limits precipitation to a few storms during the winter "wet" season. Temperatures are normally mild, except during the summer months, which commonly bring substantially higher temperatures. In all portions of the Basin, summer temperatures measuring well above 100 degrees Fahrenheit have been recorded in recent years. The annual average temperature in the Basin is approximately 62 degrees Fahrenheit.

Winds in the Project area are usually driven by the dominant land/sea breeze circulation system. Regional wind patterns are dominated by daytime onshore sea breezes. At night, the wind generally slows and reverses direction traveling towards the sea. Wind direction is altered by local canyons, with wind tending to flow parallel to the canyons. During the transition period from one wind pattern to the other, the dominant wind direction rotates into the south and causes a minor wind direction maximum from the south. The frequency of calm winds (less than 2 miles per hour) is less than 10 percent. Therefore, there is little stagnation in the Project vicinity, especially during busy daytime traffic hours.

Southern California frequently experiences temperature inversions, that inhibit the dispersion of pollutants. Inversions may be either ground based or elevated. Ground based inversions, sometimes referred to as radiation inversions, are most severe during clear, cold, early winter mornings. Under conditions of a ground based inversion, very little mixing or turbulence occurs, and high concentrations of primary pollutants may occur local to major roadways. Elevated inversions can be generated by a variety of meteorological phenomena. Elevated inversions act as a lid or upper boundary and restrict vertical mixing. Dispersion is not restricted below the elevated inversion. Mixing heights for elevated inversions are lower and more persistent in the summer. This low summer inversion puts a lid over the Basin and is responsible for the high levels of ozone observed during summer months in the air Basin.

Air Quality Pollutants and Regulatory Standards

Air Quality Pollutants

Air quality studies generally focus on five pollutants that are most commonly measured and regulated: carbon monoxide (CO), nitrogen dioxide (NO₂), ozone (O₃), respirable particulate matter (PM₁₀), and sulfur dioxide (SO₂). Ozone is not directly emitted from pollution sources, but rather forms in the atmosphere through a chemical reaction between Reactive Organic Gases (ROG) and nitrogen oxides (NO_x). Thus, air quality studies analyze ROG and NO_x, as emissions of these ozone precursors are more easily modeled and estimated for environmental review purposes.

Carbon monoxide (CO) is a colorless gas that interferes with the transfer of oxygen to the brain. CO is emitted almost exclusively from the incomplete combustion of fossil fuels. Along with carbon dioxide, CO is emitted by motor vehicles, power plants, refineries, industrial boilers, ships, aircrafts and trains. Automobile exhausts release most of the CO in urban areas. CO concentrations are

influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability.

Ozone is a colorless gas that enters the human bloodstream and interferes with the transfer of oxygen, depriving sensitive tissues in the heart and brain of oxygen. Ozone also damages vegetation by inhibiting their growth. Although ozone is not directly emitted, it forms in the atmosphere through a chemical reaction between Reactive Organic Gases (ROG) and nitrogen oxides (NO_x), which are emitted from industrial sources and from automobiles. Substantial ozone formation generally requires a stable atmosphere with strong sunlight.

Nitrogen Dioxide (NO₂) is a brownish gas that irritates the lungs. At high concentrations, it can cause breathing difficulties and aggravate respiratory illnesses. Like ozone, NO₂ is not directly emitted, but is formed through a reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO₂ are collectively referred to as nitrogen oxides (NO_x) and are major contributors to ozone formation. NO₂ also contributes to the formation of PM₁₀, small liquid and solid particles that measure less than 10 microns in diameter. At atmospheric concentration, NO₂ is only potentially irritating. High concentrations produce a brownish-red cast to the atmosphere and reduced visibility.

PM₁₀ refers to particulate matter which measures less than 10 microns in diameter, about one-seventh the thickness of a human hair. Particulate matter pollution consists of very small liquid and solid particles floating in the air, which can include smoke, soot, dust, salts, acids, and metals. Particulate matter also forms when emissions from motor vehicles undergo chemical reactions in the atmosphere. Major sources of PM₁₀ include motor vehicles; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfire, brush and waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. Suspended particulates produce haze and reduce visibility. Additionally, PM₁₀ poses a greater health risk than large-sized particles. When inhaled, these tiny particles can penetrate the human respiratory system's natural defense and damage the respiratory tracts. PM₁₀ can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections.

Sulfur dioxide (SO₂) is a product of high-sulfur fuel combustion. The main sources of SO₂ are coal and oil used in power stations, industry and for domestic heating. Industrial chemical manufacturing is another source of SO₂. SO₂ is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO₂ can also yellow plant leaves and erode iron and steel.

Air Quality Regulatory Standards

Air quality regulations are promulgated by the U.S. Environmental Protection Agency (EPA), the Federal Clean Air Act (CAA), the California EPA and the California CAA (CCAA). All of these regulations are administered locally by State-designated air quality regions and districts. The Project falls within the South Coast Air Basin (Basin), and is therefore regulated locally by the South Coast Air Quality Management District (SCAQMD) and by the California Air Resources Board (CARB). The SCAQMD establishes and enforces regulations for stationary sources in the Basin and develops and implements Transportation Control Measures. The CARB is charged with regulating vehicle emissions. CARB also is responsible for the vehicle inspection program. In areas that are not achieving the federal ambient air quality standards, the CAA requires CARB, the SCAQMD and Southern California Association of Governments (SCAG) to develop and implement plans to meet the standards. In California these plans are known as the Air Quality Management Plan (AQMP). The U.S. EPA oversees these efforts to ensure that the AQMP is being adequately developed and implemented. For the Basin, the SCAQMD prepares all of the AQMP, except the transportation component, which is prepared by SCAG.

The Basin has been designated by the U.S. EPA as a non-attainment area for ozone, carbon monoxide, and suspended particulates. As a result, CARB, SCAQMD and SCAG, in coordination with local governments and the private sector, have developed an AQMP for the Basin, which provides the blueprint for meeting State and Federal ambient air quality standards. The governing board of the SCAQMD adopted the 1997 AQMP on November 8, 1996. CARB amended the Ozone portion of the 1997 AQMP in 1999, as part of the California State Implementation Plan. The U.S. EPA adopted the 1997 AQMP, together with the 1999 Amendments, in December of 1999. The 1997 AQMP (with the 1999 Amendments) supersedes the previous AQMP (revised in 1994 and adopted locally in November 1996).

Nitrogen dioxide in the Basin has met the Federal standards for three consecutive years, and therefore, is qualified for redesignation to attainment. A maintenance plan for nitrogen dioxide is included in the 1997 AQMP. The CCAA mandates the implementation of the program that will achieve the California Ambient Air Quality Standards (CAAQS) and the CAA mandates the implementation of new air quality performance standards.

Attainment of all Federal PM₁₀ health standards is to be achieved by December 31, 2006, and ozone standards are to be achieved by November 15, 2010. For CO, the deadline was December 31, 2000. The basin was very close to attaining the CO standard at the end of 2000 and was granted a two year extension to meet the federal standards. The 2001 AQMP currently being prepared will contain measures to ensure attainment of the federal CO standard by the end of 2002.

The overall control strategy for the AQMP is to meet applicable State and Federal requirements and to demonstrate attainment with ambient air quality standards. The 1997 AQMP uses two tiers of emission reduction measures; (1) short- and intermediate- term measures, and (2) long-term measures.

Short- and intermediate-term measures propose the application of available technologies and management practices between 1994 and the year 2005. These measures rely on known technologies and proposed actions to be taken by several agencies that currently have statutory authority to implement such measures. Short- and intermediate-term measures in the 1997 AQMP include 35 stationary source, seven on-road, six off-road, one transportation control and indirect source, five advanced transportation technology, and one further study measures. All of these measures are proposed to be implemented between 1995 and 2005. These measures rely on both traditional command and control and on alternative approaches to implement technological solutions and control measures.

To ultimately achieve ambient air quality standards, additional emission reductions will be necessary beyond the implementation of short- and intermediate-term measures. Long-term measures rely on the advancement of technologies and control methods that can reasonably be expected to occur between 1997 and 2010. These long-term measures rely on further development and refinement of known low- and zero-emission control technologies for both mobile and stationary sources, along with technological breakthroughs.

State law mandates the revision of the AQMP at least every three years, and Federal law specifies dates certain for developing attainment plans for criteria pollutants. Accordingly, SCAQMD and SCAG are currently in the process of preparing an updated AQMP.

Ambient Air Quality

Air quality at any site is dependent on the regional air quality and local pollutant sources. Regional air quality is determined by the release of pollutants throughout the air Basin. Estimates for the Basin have been made for existing emissions ("1997 Air Quality Management Plan," October 1996). The

data indicate that mobile sources are the major source of regional emissions. Motor vehicles (i.e., on-road mobile sources) account for approximately 51 percent of volatile organic compounds (VOC), 63 percent of nitrogen oxide (NO_x) emissions, and approximately 78 percent of CO emissions.

The Project site is located in SCAQMD Source Receptor Area 2 (West LA). Certain air quality data for this area is collected at the West Los Angeles Veteran's Administration (West LA/VA) Hospital monitoring station, which is considered representative of the air quality experienced in the vicinity of the Project. The air pollutants measured at the West LA/VA Hospital station include ozone, carbon monoxide (CO), and nitrogen dioxide (NO₂). Sulfur dioxide (SO₂) and particulate (PM₁₀) concentrations for the area encompassing the Project site are measured at the Hawthorne Station. The air quality monitored data from 1998-2001 for all of these pollutants are shown in **Table V.B-1**. This table also presents the Federal and State air quality standards.

Table V.B-1
Air Quality Levels Measured at the West LA/VA Hospital & Hawthorne Monitoring Stations

Pollutant	California Standard	National Standard	Year	% Msrd. ¹	Max. Level	Days State Std. Exceeded
Ozone	0.09 ppm for 1 hr.	0.12 ppm for 1 hr.	2001	99	0.099	1
			2000	100	0.104	2
			1999	100	0.117	4
			1998	100	0.127	7
CO	20 ppm for 1 hour	35 ppm for 1 hour	2001	100	4.5	0
			2000	82	4.4	0
			1999	98	6.1	0
			1998	97	6.8	0
CO	9.0 ppm for 8 hour	9 ppm for 8 hour	2001	100	4	0
			2000	98	4.3	0
			1999	98	3.6	0
			1998	97	4.5	0
Particulates PM ₁₀ ^{4*} (24 Hour)	50 ug/m ³ for 24 hr.	150 ug/m ³ for 24 hr.	2001	96	75	8/48
			2000	96	74	9/54
			1999	98	69	6/33
			1998	95	66	7/42
Particulates PM ₁₀ ^{5*} (Annual)	30 ug/m ³ AGM ³	50 ug/m ³ AAM ²	2001	96	34/37	yes
			2000	96	33/36	yes
			1999	98	33/35	yes
			1998	95	30/33	yes
NO ₂ (1-Hour)	0.25 PPM for 1 hour	None	2001	100	0.109	0
			2000	100	0.162	0
			1999	100	0.133	0
			1998	99	0.130	0
NO ₂ (AAM ²)	None	0.053 ppm AAM ²	2001	100	0.024	n/a
			2000	100	0.026	n/a
			1999	100	0.028	n/a
			1998	99	0.026	n/a

Table V.B-1 (Cont.)
Air Quality Levels Measured at the West LA/VA Hospital & Hawthorne Monitoring Stations

Pollutant	California Standard	National Standard	Year	% Msrd. ¹	Max. Level	Days State Std. Exceeded
SO ₂ * (24 Hour)	0.04 ppm 24 Hr.	0.14 ppm for 24 hr.	2001	100	0.009	0
			2000	100	0.016	0
			1999	100	0.019	0
			1998	98	0.013	0
SO ₂ * (AAM ²)	None	0.030 ppm AAM ²	2001	100	0.004	n/a
			2000	100	0.003	n/a
			1999	100	0.004	n/a
			1998	98	0.004	n/a

*PM₁₀ and SO₂ measurements are taken from the Hawthorne Station.

1. Percent of year where high pollutant levels were expected that measurements were made.
2. Annual Arithmetic Mean (AAM)
3. Annual Geometric Mean (AGM)
4. First number shown in Days State Standard Exceeded column represents the actual number of days measured that State standard was exceeded. The second number shows the number of days the standard would be expected to be exceeded if measurements were taken everyday.
5. Levels Shown for Annual PM₁₀ are AGM/AAM

Source: California Air Resources Board website, Air Quality Data Statistics, ADAM Data Summaries, www.arb.ca.gov/adam/welcome.html

The monitoring data presented in **Table V.B-1** shows that ozone and particulates are the air pollutants of primary concern in the Project area. The State ozone standard was exceeded between 1 and 7 days per year in the last 4 years; the Federal standard was exceeded one day in 1998 and has not been exceeded since. The data from the past four years shows a downward trend in the maximum ozone concentrations and the number of days exceeding the State and Federal ozone standards.

The data indicates that over the past four years, the State standards for PM₁₀ have been exceeded as few as 33 days and as many as 54 days per year. There does not appear to be any trend toward fewer days of exceeding the standard, PM₁₀ levels in the area are due to natural sources, grading operations motor vehicles and chemical reactions in the atmosphere.

Currently, CO levels in the Project region comply with the State and Federal 1-hour and 8-hour standards. High levels of CO commonly occur near major roadways and freeways. CO may potentially be a continual problem in the future for areas next to freeways and other major roadways.

The monitored data shown in **Table V.B-1** shows that other than ozone and PM₁₀, no State or Federal standards were exceeded for the remaining criteria pollutants.

Existing Regional Emissions

The current uses on the Project site generate air pollutant emissions. The primary source of regional emissions is motor vehicles. Other emissions are generated from the combustion of natural gas for space heating and the generation of electricity. Emissions are also generated by the use of natural gas and oil for the generation of electricity off-site.

Emission rates for employee vehicle trips and heavy truck operations were taken from EMFAC2000 (Version 2.02). EMFAC2000 is a computer program generated by the California Air Resources Board that calculates emission rates for vehicles. The emission factors were calculated for an average speed of 25 miles per hour.

The data used to estimate the on-site combustion of natural gas and off-site electrical usage, which are based on the proposed land uses in terms of dwelling units and square footages, and emission factors, were obtained from the 1993 SCAQMD CEQA Handbook.

The Project traffic analysis shows that the existing uses on the Project site generate 19,161 daily trips. The average trip length used to calculate pollutant emissions was 9 miles. This is a composite trip length derived from data contained in the SCAQMD CEQA Handbook. The product of the existing daily trips and trip length translates to a total of 172,449 vehicle miles traveled (VMT) generated by the existing uses on the Project site. An average speed of 25 miles per hour was assumed.

Additional pollutant emissions are generated on-site by the combustion of natural gas for space and water heating and off-site due to electrical usage. The square footages and emission factors utilized in calculating the emissions with these sources are provided in **Appendix 3**. The emissions are projected for 2001. The existing emissions from the Project site are presented in **Table V.B-2**.

Table V.B-2
Regional Air Pollutant Emissions from Existing Uses

Air Pollutant Emissions (lbs/day)					
	CO	ROG	NO _x	PM ₁₀	SO _x
Vehicular Emissions	6280.3	433.4	800.1	28.1	110.3
Natural Gas Consumption	1.2	0.3	7.5	0.0	0.0
Electrical Generation	7.1	0.4	40.6	1.4	4.2
Total Existing Emissions	6288.6	434.1	848.1	29.5	114.5

Local Air Quality

Introduction & Criteria

Locally, carbon monoxide is a primary pollutant. While CO is directly emitted from a variety of sources, the most notable source of carbon monoxide is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used to assess its impacts on the local air quality. The Federal and State standards for CO are presented in **Table V.B-3**.

Table V.B-3
Federal and State Carbon Monoxide Standards

	Averaging Time	Standard
Federal	1 hour	35 ppm
	8 hours	9 ppm
State	1 hour	20 ppm
	8 hours	9 ppm

Some land uses are considered more sensitive to the effects of CO concentrations and air pollution than others, due to the types of population, groups or activities present. Land uses considered relatively sensitive to air pollution include, schools, hospitals, playgrounds, childcare centers, retirement homes, and convalescent homes. Residential areas are also considered to be sensitive because residents are likely to be home for extended periods of time, resulting in prolonged exposure to present pollutants.

Carbon monoxide levels in the Project vicinity due to nearby roadways were assessed with the CALINE4 computer model. CALINE4 is a fourth generation line source air quality model developed by the California Department of Transportation ("CALINE4," Report No. FHWA/CA/TL-84/15, June 1989). The precise methodology used in modeling existing air quality with the CALINE4 computer model is discussed in more detail under Operational Phase Impacts, Local Air Quality, below. The remainder of this section discusses the existing carbon monoxide levels in comparison to the State and Federal carbon monoxide standards.

Local CO Modeling

The CALINE4 CO modeling was conducted for two intersections in the Project area: (1) Santa Monica Boulevard (South) at Wilshire Boulevard, and (2) Santa Monica Boulevard at Beverly Glen Boulevard. CO levels were modeled for four receptors in each corner of each intersection. The highest concentration of the four receptors at each intersection is reported in **Table V.B-4**.

The background CO concentrations used to determine the total CO concentrations were taken from the SCAQMD CEQA Handbook for Source Receptor Area 2. This data indicates the 1-hour background CO concentration is 6.3 ppm in the area and the 8-hour background concentration is 3.4 ppm. The background concentrations are intended to account for all other sources of CO in the area that are not directly modeled. Therefore, 6.3 ppm is added to the worst-case modeled 1-hour projections, and 3.4 ppm to the 8-hour projections, to account for the background carbon monoxide levels.

The peak hour traffic and Level of Service (LOS) data were taken from the traffic analysis prepared for the Project. The modeling results of the existing CO levels are presented in **Table V.B-4**. (Printouts of the CALINE4 input and output files are presented in Appendix 3.)

Table V.B-4
Existing Modeled Carbon Monoxide Concentrations (ppm)

Intersection	1-Hour CO Concentration (ppm)	8-Hour CO Concentration (ppm)
1. Santa Monica at Beverly Glen	12.3	7.7
2. Santa Monica (South) at Wilshire Boulevard	18.5	12.2
State Standard	20	9

NOTE: The CO concentrations include the ambient concentrations of 6.3 ppm for 1-hour levels, and 3.4 ppm for 8-hour levels.

Table V.B-4 shows that the CO concentrations in the vicinity of the Project do not exceed the 1-hour standard. However, the 8-hour standard is exceeded immediately adjacent to Intersection #2 (Santa

Monica Boulevard (South) at Wilshire Boulevard). Note that the modeling assumes conditions that will result in the highest possible concentrations. The specific weather and traffic conditions would need to occur during the same simultaneous period to approach the levels modeled. In addition, background levels are added to the modeled concentrations. These background concentrations represent a worst-case assumption about how much all other sources of CO not included in the model contribute to the total CO concentration. These background concentrations were developed by the SCAQMD for their 1992 CEQA Handbook and have not been updated since but represent the best available data. The modeling indicates the possibility for the 8-hour CO standard to be exceeded near Intersection #2 on occasion but this would not be expected to occur on a regular basis. With improvements in vehicle technology and compliance with stricter regulations, vehicle emissions for the region are projected to be significantly lower in the future.

Threshold of Significance

Regional Air Quality

In its "1993 CEQA Air Quality Handbook" the SCAQMD established significance thresholds to assess the regional impact of project related air pollutant emissions. **Table V.B-5** presents these significance thresholds. There are separate thresholds for short-term construction and long-term operational emissions. A project resulting in net increases in daily air pollutant emissions below these thresholds are considered to have a less than significant effect on regional air quality throughout the South Coast Air Basin.

Table V.B-5
SCAQMD Regional Pollutant Emission Thresholds of Significance

	Pollutant Emissions				
	CO	ROG	NO _x	PM ₁₀	SO _x
Construction (lbs/day)	550	75	100	150	150
Construction (tons/qtr)	24.75	2.5	2.5	6.75	6.75
Operation (lbs/day)	550	55	55	150	150

Local Air Quality

The significance thresholds for local air quality impacts include the State standards of 20 ppm for 1-hour CO concentration levels, and 9 ppm for 8-hour CO concentration levels. If the future CO concentration levels with the Project are below the standards, then there is no significant impact. If CO concentrations are over the standards and the Project increases the concentrations by 1 ppm for the 1-hour, and 0.45 ppm for the 8 hour, then the project results in a significant local air quality impact.

Project Impacts

Air quality impacts from the Project are divided into short term and long-term. Short-term impacts are the result of Project construction and demolition operations. Long-term impacts are associated with the operation of the completed Project.

Construction Phase Impacts

Construction Air Pollutant Emissions

Temporary air quality impacts would result from Project construction and demolition activities. Air pollutants would be emitted by construction equipment and fugitive dust would be generated during demolition of the existing buildings on site. Peak periods of demolition would result in the greatest

level of air pollution emissions. Project development would occur in two general phases: 1) demolition of existing structures; and 2) erection of the new building. Demolition would consist of removal of the concrete and steel skeletal structures. Removal of the plaza areas is also included in this stage. Erection of the new structure includes: foundation strengthening, steel framing, flooring, fireproofing, external finishing, infrastructure installation, interior finishing and site work. The demolition and construction activities are discussed in greater detail in Appendix 5.

In order to minimize functional disruption to surrounding uses, demolition of the exterior skin will occur within shrink wrap-enclosed scaffolding surrounding each of the two existing buildings, and Concourse and Plaza level locations. By shrink wrapping, each building becomes an air containment area under negative pressure so that exterior work can be performed within this area in a controlled environment.

The demolition process will involve the removal of all remaining furnishings, carpeting, window treatments, partitions, door assemblies, mechanical ducting, cabinetry and millwork, theatre seating, stages and all associated rigging, catwalks as needed, electrical systems, lighting, plumbing, fencing, suspended ceilings, insulation, stairwell enclosures, shaft wall construction, piping, sprinklers, curtain wall construction such as travertine and glazing, metals studs and framing, store front glass systems, restaurant equipment, counters and benches, theatre screens, etc.

Due to construction, excavation and material removal activities, the demolition phase represents the "worst-case" scenario with respect to short-term air pollutant emissions and is analyzed in this document. Demolition is labor and equipment intensive. The work will require on average crew sizes of approximately 100 men which will fluctuate in accordance with the work phasing. This phase would require mobilization of approximately seven excavators, a crawler loader/wheel loader, eight bobcats with material handling attachments, crane and cable, and hand tools, which would be used for initial cutting and felling of the material and for manipulating and downsizing concrete, steel, and other building demolition materials.

Hazardous demolition materials will be sent down sealed chutes to an on-site lockable, and sealed bin/dumpster. Stockpiling will be limited to non-hazardous materials in the existing loading dock areas to the extent possible. A goal of the Project is to reuse and/or recycle as much of the existing structure as possible. The recycling component of the Project is a major design feature. It is anticipated that at least 50 percent of all materials would be recycled. Items with salvage value such as doors, bathroom fixtures, theater seats, mirrors, and glass would be removed intact. Other materials, such as structural steel, decking, and concrete, would be separated on-site and sent to appropriate recycling facilities. It is currently expected that there would be two staging areas adjacent to the site: one along Constellation Boulevard and the other along Avenue of the Stars. Incoming trucks, except those required to support the immediate operations, would be staged outside the Century City boundary.

Concrete from the site would be hauled via the Santa Monica (I-10) Freeway to recycling sites located to the east. Steel would be hauled via the San Diego (I-405) Freeway or Harbor Freeway (I-110) to recycling sites located to the south.

Approximately 4,000 roundtrip truck trips would be required to haul the debris away at a rate of 41 round trips per day. At this time it is not known where all of the materials would be taken. All potential sites are within a one-way trip length of 40 miles¹⁸ from the Project site. Therefore, a worst-

¹⁸ Potential haul off destinations include without limitation: Hazardous Materials: Azusa Land Reclamation in Azusa; Crusher Locations: Hanson Aggregate, Santa Monica; Copp Crushing, El Segundo; Dump Sites: Waste Transfer & Recycling, Los Angeles; Western USA Waste, Carson; Bradley West, Sun Valley; Recyclable Steel: steel recyclers at the Port of Los Angeles.

case one-way trip length of 40 miles was used for all trips. It was assumed conservatively that there would be a maximum of 200 employee vehicles traveling to and from the site each day and the average trip length for each employee vehicle is 20 miles¹⁹

Emissions from construction activities for large development projects are estimated by the U.S. EPA. The 1993 CEQA Handbook establishes an emission factor of 0.00042 pounds of PM₁₀ per cubic foot of building space for demolition activities. Demolition emissions were calculated based on the gross existing floor square footage multiplied by a 12-foot height to determine volume.

Typical emission rates for construction equipment were obtained from the 1993 CEQA Air Quality Handbook. These emission factors are presented in terms of pounds of pollutant per hour of equipment operation. It should be noted that most of these emission factors were initially published in 1985 in the EPA's AP-42 Compilation of Emission Factors. These emission rates have not been updated since their original publication. Several State and Federal regulations have been enacted since this time that require reduced emissions from construction equipment. The effect of these regulations is not included in the emission factors used to calculate construction equipment emissions presented below. The actual emissions from construction equipment, therefore, would likely be lower than presented below. However, the exact reduction is not known. The exact reduction would depend on the age of the specific equipment used at the construction site. As time passes, older equipment would be replaced with newer equipment manufactured with the lower emission requirements. Therefore, construction occurring farther in the future would likely be reduced by a greater amount versus near term construction.

Emission rates for employee vehicle trips and heavy truck operations were taken from EMFAC2000 (Version 2.02). EMFAC2000 is a computer program generated by the California Air Resources Board that calculates emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile.

Using the estimates presented above, the peak emissions for the demolition are calculated and presented in **Table V.B-6**. The data used to calculate the demolition emissions are shown in **Appendix 3**.

Table V.B-6
Total Air Pollutant Emissions Generated by Demolition

	Pollutant Emissions (lbs./day)				
	CO	ROG	NO _x	PM ₁₀	SO _x
Demolition Particulates	0.0	0.0	0.0	35.2	0.0
Construction Equipment	97.9	16.7	144.9	10.1	13.1
Debris Hauling Trucks	36.5	11.7	70.2	5.2	2.2
Employee Travel (200 employees)	257.6	17.7	33.7	1.3	0.9
Gross Demolition Emissions	392.0	46.1	248.8	51.8	16.2
Gross Tons per Quarter	17.9	2.1	11.4	0.8	0.7

The existing office space, retail uses, theater, cinema and health club would continue to generate emissions on the Project site without the Project. The net changes in pollutants generated by the demolition are determined by subtracting the emissions that would be generated with the existing land uses. This is shown in **Table V.B-7** for daily emissions and **Table V.B-8** for quarterly emissions.

¹⁹ Derived from the SCAQMD CEQA Handbook.

The gross total Project emissions are shown in the first row with the emissions from the existing uses in the second row. The differences, the net demolition emissions, are shown in the third row.

Table V.B-7
Daily Net Air Pollutant Emissions during Demolition

	Pollutant Emissions (lbs./day)				
	CO	ROG	NO _x	PM ₁₀	SO _x
Gross Demolition Emissions	392.0	46.0	248.8	51.8	16.2
Existing Use Emissions	6288.6	434.1	848.1	29.5	114.5
Net Demolition Emissions	-5,896.6	-388.1	-599.3	22.3	-98.3
<i>SCAQMD Thresholds</i>	<i>550</i>	<i>75</i>	<i>100</i>	<i>150</i>	<i>150</i>

Table V.B-8
Quarterly Net Air Pollutant Emissions during Demolition

	Pollutant Emissions (tons./day)				
	CO	ROG	NO _x	PM ₁₀	SO _x
Gross Demolition Emissions	17.9	2.1	11.4	2.4	0.7
Existing Use Emissions	286.9	19.8	38.7	1.3	5.2
Net Demolition Emissions	-269.0	-17.7	-27.3	1.0	-4.5
<i>SCAQMD Thresholds</i>	<i>24.75</i>	<i>2.5</i>	<i>2.5</i>	<i>6.75</i>	<i>6.75</i>

Tables V.B-7 and V.B-8 show that the Project results in a net reduction in emissions during demolition for all pollutants with the exception of PM₁₀. The reductions range from 71% to 94% of the existing use emissions. The projected net increase in PM₁₀ emissions during demolition is below the daily and quarterly SCAQMD significance thresholds. This phase of construction would generate the highest emission levels, and emissions from all other phases of construction would be below the thresholds. Therefore, the Project does not result in a significant short-term air quality impact.

Operational Phase Impacts

Regional Air Quality

The primary source of regional emissions generated by the proposed Project occur from motor vehicles. Other emissions would be generated from the combustion of natural gas for space heating and the generation of electricity. Emissions would also be generated by the use of natural gas and oil for the generation of electricity off-site.

The data used to estimate the on-site combustion of natural gas and off-site electrical usage are based on the proposed land uses in terms of dwelling units and square footages, and emission factors taken from the 1993 SCAQMD CEQA Handbook (see Appendix 3).

The Project traffic analysis shows that the Project would generate 12,450 daily trips. The average trip length for the proposed Project is assumed to be 9 miles. This is a composite trip length derived from data contained in the SCAQMD CEQA Handbook. The product of the Project daily trips and trip length, translate to total of 112,050 vehicle miles traveled (VMT) generated by the proposed Project. An average speed of 25 miles per hour was assumed.

Total Project emissions projected for 2005, based on the Project traffic analysis and on-site combustion of natural gas and off-site electrical usage data are presented in **Table V.B-9**.

Table V.B-9
Total Project Emissions

	Pollutant Emissions (lbs./day)				
	CO	ROG	NO _x	PM ₁₀	SO _x
Vehicular Trips	2685.6	184.3	383.0	17.3	71.6
Natural Gas Consumption	1.1	0.3	6.7	0.0	0.0
Electrical Generation	4.7	0.2	27.0	0.9	2.8
Total Project Generation	2691.4	184.8	416.7	18.3	74.5

The existing office space, retail uses, theater, cinema and health club would continue to generate emissions on the Project site without the Project. The net changes in pollutants generated by the Project are determined by subtracting the emissions that would be generated with the existing land uses in future years. This is shown in **Table VB-10**. The gross total Project emissions are shown in the first row with the emissions from the existing uses in the second row. The differences, the net Project emissions, are shown in the third row. Note that the emissions from existing uses presented, are lower than those shown in **Table V.B-2**. This is due to **Table V.B-10** presenting emissions from existing uses as calculated for the year 2005. This is the same year used to calculate proposed Project emissions. This provides a more conservative analysis.

Table V.B-10
Net Project Emissions

	Pollutant Emissions (lbs./day)				
	CO	ROG	NO _x	PM ₁₀	SO _x
Gross Project Emissions	2691.4	184.8	416.7	18.3	74.5
Existing Use Emissions	4141.5	284.3	637.5	28.1	114.5
Net Project Emissions	-1450.1	-99.5	-220.8	-9.8	-40.0
<i>SCAQMD Thresholds</i>	<i>550</i>	<i>55</i>	<i>55</i>	<i>150</i>	<i>150</i>

Table V.B-10 shows that the Project results in a net reduction in emissions. This is primarily due to the reduced trip generation by the Project over the existing uses. Air pollutant emissions would be less with the proposed Project than with continuation of the current uses. Emissions would be reduced with the Project. As net emissions would be less than zero, the Project would be well below SCAQMD thresholds, and the operation of the Project would not result in any significant regional air quality impacts.

Local Air Quality

As discussed above, carbon monoxide (CO) is the pollutant of major concern along roadways because motor vehicles are the most notable source of CO. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network, and are used as an indicator of its impacts on local air quality. Local air quality impacts can be assessed by comparing future carbon

monoxide levels with State and Federal carbon monoxide standards, and by comparing future CO concentrations with and without the Project. The Federal and State standards for carbon monoxide are presented in **Table V.B-3**, above.

Future carbon monoxide concentrations associated with the proposed Project were forecasted with the CALINE4 computer model. CALINE4 is a fourth generation line source air quality model developed by the California Department of Transportation ("CALINE4," Report No. FHWA/CA/TL-84/15, June 1989). The purpose of the model is to forecast air quality impacts near transportation facilities in what is known as the "microscale region", which encompasses the region a few thousand feet around the pollutant source. Given source strength, meteorology, site geometry, and site characteristics, the model can reliably predict pollutant concentrations.

The analysis set forth in this EIR with regard to meteorology, wind speed, stability class, directional characteristics, and temperature data used for the modeling are those recommended in the "Development of Worst Case Meteorology Criteria" (California Department of Transportation, June 1989). Other worst case model parameters were determined as recommended in the CALINE4 Manual.

Vehicular pollutant emission factors used with the CALINE4 computer model were taken from the EMFAC2000 program published by the California Air Resources Board (CARB).

The future peak hour traffic volumes and Level of Service (LOS) used for the CALINE4 modeling were provided by the traffic consultant. The LOS data are important in the CALINE4 computer modeling because they determine the speeds at the intersections. The speeds ultimately determine the emission factors. For both intersections analyzed it was found that PM peak is projected to have the highest levels of traffic with the Project. The periods of the highest levels of traffic were modeled to generate the worst-case CO concentrations.

The peak traffic hour conditions result in the peak 1-hour CO concentration. According to the Caltrans Air Quality Technical Analysis Notes, changes in meteorology and traffic over time disperse CO and cause it to be less severe than the peak 1-hour concentration. Therefore, it is highly unlikely that the 1-hour CO levels would persist for a full eight hours. As a result, a 1-hour CO level is generally considered to be the peak level and is higher than an 8-hour CO level.

Eight-hour carbon monoxide levels were projected using Caltrans methodology described in their "Transportation Project-Level Carbon Monoxide Protocol." The method essentially uses a persistence factor which is multiplied times the 1-hour emission projections. The projected 8-hour ambient background concentration is then added to the product. The persistence factor was determined by the average ratio of the 8-hour to 1-hour CO concentrations at the West LA/VA Hospital monitoring station for the ten highest 8-hour concentrations over the past three years. This results in a persistence factor of 0.72. The data and results of the CALINE4 modeling are also provided in the appendix.

The background CO concentrations used in modeling for the future cases is the same as used for the existing CO modeling presented above. It is expected that background CO concentrations will decrease somewhat in the future but no definite information is available to quantify this. Use of the existing background levels represents a worst-case assumption. Background CO concentrations of 6.3 ppm for 1-hour, and 3.4 ppm for 8-hour were used in the existing and future CO concentration modeling.

The CALINE4 CO modeling was conducted for two intersections in the project area: (1) Santa Monica Boulevard (South) at Wilshire Boulevard, and (2) Santa Monica Boulevard at Beverly Glen Boulevard.

These two intersections were selected because they are projected to have an LOS of D or worse in the future with the Project. Intersection #1 (Santa Monica Boulevard (South) at Wilshire Boulevard) is expected to have the largest “increase” in traffic with the Project. Because the Project results in fewer vehicle trips than the existing uses on the Project site, the Project actually results in lower traffic volumes at all intersections. Therefore, the largest “increase” in traffic is actually the smallest decrease in traffic volumes. Intersection #2 (Santa Monica Boulevard (North) at Beverly Glen Boulevard) is projected to have the highest overall traffic volumes and lowest level of service.

Receptors were located 10 feet from the edge of the roads in each corner of the intersection per EPA and Caltrans modeling guidelines. The modeling results for the receptor with the highest concentration at each intersection are reported here.

The results of the CALINE4 CO modeling for the future (2005) with and without Project are shown in **Table V.B-11**. Note that the existing scenario is also included for comparison purposes. The CO modeling results are shown for the projected 1-hour and 8-hour CO concentration levels. The pollutant levels are expressed in parts per million (ppm) for each receptor. The carbon monoxide levels reported in Table V.B-10 are the composites of the background levels of carbon monoxide coming into the area plus those generated by the local roadways.

Table V.B-11
Worst Case Future Projections of Carbon Monoxide Concentrations

Intersection	Modeled CO Concentration (ppm)					
	1-Hour			8-Hour		
	Existing	Future Without Project	Future With Project	Existing	Future Without Project	Future With Project
1) Santa Monica at Beverly Glen	12.3	14.2	14.0	7.7	9.1	8.9
2) Santa Monica (South) at Wilshire Boulevard	18.5	15.4	15.3	12.2	10.0	9.9
<i>State Standard</i>	20	20	20	9	9	9
<i>Federal Standard</i>	35	35	35	9	9	9

NOTE: The CO concentrations include the ambient concentrations of 6.3 ppm for 1-hour levels, and 3.4 ppm for 8-hour levels.

Table V.B-11 shows that the 1 hour CO standards are not projected to be exceeded in the future with or without the Project. The 8 hour CO standard at both intersections would be exceeded in the future without the Project and at Intersection #2 with the Project. At Intersection #1 (Santa Monica at Boulevard (North) at Beverly Glen Boulevard) the future concentrations are projected to increase over existing conditions. At Intersection #2 (Santa Monica Boulevard (South) at Wilshire Boulevard) future concentrations are lower than existing concentrations. In the future, average pollutant emission rates from vehicles are projected to be lower with newer vehicles complying with stricter standards becoming a larger part of the overall fleet. Near Intersection #1 future traffic increases are greater than the decrease in vehicle emissions resulting in higher CO concentrations. While future traffic volumes are projected to increase at Intersection #2, the reduction in individual vehicle emissions results in lowering CO concentrations.

At Intersection #1, the future with Project 1-hour CO concentrations are projected to be 1.7 ppm higher than existing conditions. Future with Project 1-hour CO concentrations are projected to be 0.2 ppm lower than future without Project conditions. 8-hour CO concentrations are projected to be 1.2 ppm higher than existing conditions in the future with the Project and 0.2 ppm lower than without the Project.

At Intersection #2, the future with Project 1-hour CO concentrations are projected to be 3.2 ppm lower than existing conditions. The future with Project 1-hour CO concentrations are projected to be 0.1 ppm lower than future without project conditions. Future with Project 8-hour CO concentrations are projected to be 2.3 ppm lower than existing conditions and 0.1 ppm lower than the future without Project conditions.

A significant local air quality impact occurs if the modeled CO concentrations exceed the 1-hour or 8-hour standard and the Project results in a substantial concentration increase (1 ppm for 1-hour, and 0.45 ppm for 8-hour) over the future without Project conditions. As shown in **Table V.B-11** the 1 hour CO standards are not projected to be exceeded in the future with or without the Project. The 8 hour CO standard at both intersections would be exceeded in the future without the Project and at Intersection #2 with the Project. However, in both instances the with Project concentrations would be lower than the future without Project concentrations. Therefore, the proposed Project will not result in a significant local air quality impact.

Consistency with Regional Air Quality Policies

An EIR must discuss any inconsistencies between the proposed Project and applicable General Plans and regional plans (CEQA Guidelines Section 15125). Regional plans that apply to the proposed Project include the AQMP. In this regard, this section will discuss any inconsistencies between the proposed Project and the AQMP.

The purpose of the consistency discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and to discuss whether the Project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-maker determines that the Project is inconsistent, the lead agency may consider Project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD's CEQA Handbook states "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the plan if it furthers one or more policies and does not obstruct other policies. The Handbook identifies two key indicators of consistency:

- (1) Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- (2) Whether the project will exceed the assumptions in the AQMP in 2010 or increments based on the year of project buildout and phase.

Both of these criteria are evaluated in the following sections.

Criterion 1 - Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis contained in this report, the Project results in a net reduction in emissions during both construction and operation for all pollutants with the exception of

PM₁₀ during demolition. The projected net increase in PM₁₀ emission during demolition is below the SCAQMD significance thresholds and would not contribute significantly to Basin wide emissions. The Project results in lower traffic levels than the without Project conditions and would result in a slight decrease in air pollutant concentrations along roadways in the vicinity of the Project.

The proposed Project is not projected to contribute to the exceedence of any air pollutant concentration standards, thus the Project is found to be consistent with the AQMP for the first criterion.

Criterion 2 - Exceed Assumptions in the AQMP

Consistency with the AQMP assumptions is determined by performing an analysis of the Project with the assumptions in the AQMP. Thus, the emphasis of this criterion is to insure that the analyses conducted for the Project are based on the same forecasts as the AQMP. The Regional Comprehensive Plan and Guide (RCPG) consists of three sections: Core Chapters, Ancillary Chapters, and Bridge Chapters. The Growth Management, Regional Mobility, Air Quality, Water Quality, and Hazardous Waste Management chapters constitute the Core Chapters of the document. These chapters currently respond directly to Federal and State requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA.

The assessment of the Project's consistency with the AQMP's growth assumptions is based on a comparison of net employment generated by the Project with SCAG's employment forecasts, which form the basis of the AQMP assumptions. Since the SCAG forecasts are not detailed, the test for consistency of this Project is not specific.

The AQMP assumptions are based upon projections from local general plans. Accordingly, projects that are consistent with the local general plan are also consistent with the AQMP assumptions. The proposed Project is consistent with the City of Los Angeles General Plan, the West Los Angeles Community Plan and with the Century City North Specific Plan. Therefore, the second criterion is met for consistency with the AQMP.

Consistency with Local Plans

New projects within the City of Los Angeles must comply with the Congestion Management Program (CMP) for Los Angeles County, which was adopted by the Los Angeles County Metropolitan Transportation Authority (LACMTA) in November 1995 pursuant to State law. The CMP involves monitoring traffic conditions on the designated transportation network, performance measures to evaluate current and future system performance, promotion of alternative transportation methods, analysis of the impact of land use decisions on the transportation network, and mitigation to reduce impacts on the network.

The CMP considers a project impact at an intersection to be significant if a proposed project increases traffic demand by 2 percent of capacity causing or worsening LOS F conditions. As discussed in Section V.M, the proposed Project would generate fewer trips than the existing uses. Therefore, the Project would result in less traffic on local roadways. Pollutant concentrations along roadways and intersections in the vicinity of the Project would be slightly reduced with the Project. The Project would not add to or result in any local exceedences of air pollutant concentration standards near any intersections.

The Project does not conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan.

Mitigation Measures

Construction Phase Mitigation

Emissions from construction of the Project are not considered significant and the Project does not result in a significant regional air quality impact. Implementation of the following mitigation measure would further reduce Project related construction impacts:

- AQ-1** The Project shall comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Reasonably Available Control Measures (RACM) for all fugitive dust sources, and the Air Quality Management Plan (AQMP), which identifies Best Available Control Measures (BACM) and Best Available Control Technologies (BACT) for area sources and point sources, respectively.
- AQ-2** All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
- AQ-3** The applicant or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.
- AQ-4** All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
- AQ-5** All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
- AQ-6** All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
- AQ-7** General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
- AQ-8** The Project applicant shall be required to coordinate with a representative of the Santa Monica Transit Parkway Project regarding construction-related activities.

Operational Phase Mitigation

The Project results in a net reduction in emissions during operation for all pollutants. Emissions from the operation of the Project are below the SCAQMD thresholds. Therefore, emissions from operation of the Project are not considered significant and the Project does not result in a significant regional air quality impact. No mitigation is required.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

Cumulative Construction Impacts

Of the projects noted in the related projects table (Section IV, Table IV-1), it is possible that some may overlap schedules with the Project and raise the issue of significance of cumulative construction air quality impacts. The closest of these include Constellation Place, Santa Monica Boulevard Transit Parkway project, Westfield Shoppingtown Century City Expansion, and the Fox Studio Expansion, and are discussed below.

Constellation Place

Construction of the 700,000 square foot, 35-story office building located at 10250 Constellation Place began in March 2001. The building is expected to be ready for occupancy in June 2003. All mass excavation and grading activities, along with the building superstructure, have been completed. Work is continuing on the exterior curtain wall, and interior construction of tenant improvements has commenced. Constellation Place was determined to have a short-term significant impact from NOx and PM₁₀ emissions during demolition and a significant NOx impact during foundation placement and erection of the tower. However, as discussed above, these short-term activities have been completed.

Fox Studios

Fox Studios received approval in 1993 for the construction or replacement of 1,895,000 square feet of studio related uses at the Fox Studios located at 10201 Pico Boulevard. No construction of new facilities involving mass quantities of grading and/or excavation is anticipated to occur simultaneously with the construction of the 2000 Avenue of the Stars project.

Westfield Shoppingtown Century City

Westfield Shoppingtown Century City (formerly known as the Century City Shopping Center), located at 10250 Santa Monica Boulevard, was recently purchased by Westfield America. Previous owners of the shopping center obtained approval to construct 71,700 square feet of net new building area on the property. The status of construction of any additional floor area is not presently known.

Santa Monica Boulevard Transit Parkway Project

Construction of the Santa Monica Boulevard Transit Parkway Project is scheduled to begin in January 2003 and be complete in July 2005. The project is designed to rehabilitate, reconstruct and reconfigure Santa Monica Boulevard between the Beverly Hills city limit on the east and the San Diego (405) Freeway on the west. Construction of the project will occur during five phases in seven segments of Santa Monica Boulevard. The preliminary schedule calls for construction between Century Park West and Moreno Drive (the Beverly Hills City limit) during the first 10 to 14 months of the project, with construction activities diminishing over the next six to eight months. Construction east of Avenue of the Stars is anticipated to be complete by the end of 2002/beginning of 2003, and construction between Avenue of the Stars and Century Park West is anticipated to be complete by August of 2003. The Santa Monica Boulevard Transit Parkway Project was determined to have a temporary significant impact from PM₁₀ emissions during project construction.

The AQMP anticipates growth and associated construction in the region, consistent with SCAG projections. Each project must be evaluated for the need for CEQA analysis, and mitigation measures applied to reduce impacts where appropriate.

The construction schedules for each of the projects discussed above could coincide; however, because initiation and completion of the projects depends in part on economic and other unpredictable factors, any overlap is uncertain. For example, the Fox Studios project has been approved for some time, yet not all of the construction has been initiated. Further, construction impacts are short term, and will cease upon occupancy/opening of the related projects. It is unlikely that the worst-case situation, where all four related projects are under construction with their emissions, would occur.

Further, it is noted that construction air quality emissions vary considerably from day to day, and the worst-day emissions are assumed for purposes of this analysis. In addition, each of the related projects has been required to mitigate their impacts to the maximum extent feasible. Thus it is likely that actual air emissions will be less than predicted. In any case, the proposed Project's contribution

is substantially less than significant (the 22.3 lbs. per day projected Project construction emissions of PM₁₀ are only 15% of the SCAQMD threshold of 150 lbs. per day, all other emissions are reduced). However, the Santa Monica Transit Parkway Project is currently scheduled to be under construction at the same time as the proposed Project. Such scheduling, coupled with other projects which could commence construction during this time could result in a potentially significant cumulative air quality impact due to construction emissions.

Cumulative Operational Impacts

The Basin has been designated by the U.S. Environmental Protection Agency (EPA) as a non-attainment area for ozone, carbon monoxide, and suspended particulates (PM₁₀). Data presented in **Table V.B-1** shows that ozone and particulates are the air pollutants of primary concern in the Project area. The State ozone standard was exceeded two days in the year 2000, four days in 1999, seven days in 1998 and six days in 1997; the Federal standard was only exceeded one day in the past four years, in 1998. The data from the past four years shows a downward trend in the maximum ozone concentrations and the number of days exceeding the State and Federal ozone standards. Over the past four years, State standards for PM₁₀ have been exceeded as few as 33 and as many as 54 days per year. There does not appear to be any trend toward fewer days of exceeding the standard, although the maximum level in 2000 was the lowest in the past four years.

Ozone is a secondary pollutant; it is not directly emitted but rather the result of chemical reactions between other precursor pollutants, most importantly ROG and NO₂. The net changes in pollutants generated by the Project are determined by subtracting the emissions that would be generated with the existing land uses from the Project's emissions. The Project results in a net reduction in emissions. This is primarily due to the reduced trip generation by the Project over the existing uses. Emissions of precursor pollutants would be reduced during Project construction and operation when compared to existing conditions. Therefore, the Project would likely result in a cumulative reduction in ozone levels.

Carbon monoxide (CO) is another important pollutant that is due primarily to motor vehicles. Data presented in **Table V.B-1** indicates that CO levels in the Project region are currently in compliance with the State and Federal 1-hour and 8-hour standards. As shown in **Table V.B-11**, the Project would result in a net reduction in CO levels over future without Project conditions. The Project would not contribute to a cumulative increase in CO levels in the region.

PM₁₀ levels in the area are due to natural sources, grading operations and motor vehicles. During Project operation, PM₁₀ emissions would be reduced when compared to existing conditions. The operation of the Project would not contribute to a cumulative increase in PM₁₀ levels in the region.

Related future projects that are included in the adopted plans are included in SCAQMD projections for the region. In addition, individual projects would be reviewed for impacts and mitigation measures required, where possible and applicable. In the event related projects propose plan amendments, environmental documentation would be required to assess impacts and mitigation measures. Further, the SCAQMP, and continuing updates of that plan, are required to include air emission reduction strategies for the Basin (such as increased stationary source emission controls, improved vehicle emission standards, transportation alternatives, etc.). These, in concert with individual project mitigation measures would help reduce impacts. However, until the Basin as a whole attains all federal and state EPA standards, which is not anticipated to occur until 2010, any net increase in regional air pollutant emissions would contribute to a cumulative air quality impact that would be deemed significant. Because the operational phase of the Project results in a net reduction in emissions for all pollutants, it does not contribute to any potential cumulative air quality impacts.

2. Wind

Existing Conditions

This wind section is based upon the Pedestrian Wind Study prepared by Rowan Williams Davies and Irwin Inc. (RWDI), dated March 29, 2001, July 17, 2001, and February 8, 2002 (**Appendix 4**). The purpose of the study was to assess the wind environment around the subject property in terms of pedestrian comfort and safety for typical summer and winter seasons, and identify impacts associated with implementation of the Project. The study was prepared using a 1:400 scale model of Century City, which included existing and proposed configurations of the subject property, and all relevant surrounding buildings and topography within a 1,600 feet radius of the study site. The model was placed in a boundary layer wind tunnel. Up to seventy wind speed sensors were placed throughout the model to measure mean and gust wind speeds at a full scale height of approximately 5 feet.

Wind statistics recorded at the Santa Monica Municipal Airport between 1973 and 1999 were analyzed for the Summer (May through October) and Winter (November through April) seasons. Winds from the southwesterly directions are predominant in both seasons. The wind statistics were combined with the wind tunnel data in order to predict the frequency of occurrence of full scale wind speeds.

Average gust wind speeds predicted to occur at each test location on the model were compared to pedestrian comfort criteria to determine the acceptability of the wind conditions for pedestrian use and assigned to one of four general comfort categories. Wind conditions are acceptable for sitting, standing, or walking if the wind speeds are within their specified ranges at least 80% of the time. An uncomfortable designation means that the 80% criterion was not satisfied for walking. The four comfort categories are:

- **Sitting:** Gust speeds up to 11 miles per hour (mph) – Low wind speed areas where one could read a newspaper without it blowing away;
- **Standing:** Gust speeds up to 16 mph – Slightly higher wind speeds that would be strong enough to rustle leaves;
- **Walking:** Gust speeds up to 20 mph – Winds that would lift leaves, cause movement to litter, hair and loose clothing;
- **Uncomfortable:** Gust speeds greater than 20 mph – The effects of winds at this level would range from small trees swaying and wind force felt on the body (approximately 26 mph) to whole trees in motion and inconvenience being felt when walking (52 mph gust).

Safety is also considered by the criteria. Wind speeds in excess of 55 mph can adversely affect a pedestrian's balance and footing. If winds of this magnitude occur more than three times per year, a fail designation is assigned to the sensor location.

The plaza area is generally considered comfortable for walking. The area between the 2020 and 2040 Avenue of the Stars buildings is generally considered comfortable for standing. The northern portion of the plaza was characterized as comfortable for standing, with the area nearest to Constellation Boulevard comfortable for walking. Several areas in the corridor between and around the existing Century Plaza Tower buildings are considered uncomfortable. Street level locations along Avenue of the Stars and near the Century Plaza Hotel are generally considered comfortable for standing.

Threshold of Significance

The Project would result in a significant impact if the proposed design were to alter the existing wind condition, such that it would create an unsafe wind condition at a location currently considered safe.²⁰

Project Impacts

The wind analysis performed for the proposed Project determined that wind conditions in the plaza area were considered comfortable for walking. Wind conditions comfortable for sitting are preferable for uses such as outdoor cafes or amphitheaters. In the plaza area, locations nearest to the eastern side of the proposed building were sheltered from the prevailing southwesterly winds as in the existing condition. This effectively yielded comfortable sitting conditions in the summer and standing conditions in the winter. In the winter, these locations were acceptable for sitting 79 percent and 76 percent of the time. These conditions would be considered appropriate for outdoor seating areas. Wind conditions comfortable for standing were also found in the plaza around the north and southeastern perimeter of the plaza for both seasons and the eastern most portion of the plaza in the summer. The southeastern portion of the plaza would improve from walking to standing as a result of the proposed Project. Winds in the plaza area most commonly deflected off the Century Plaza Towers or channeled into the plaza from Constellation Boulevard similarly to existing conditions. Wind conditions on the northern portion of the Plaza Level would not be considered comfortable for outdoor seating; however, no areas within the proposed plaza area would be considered unsafe.

Around the main entrance to the proposed building, wind conditions would be comfortable for standing or better during summer and winter. Conditions better than standing at this location would be an improvement from the existing conditions. Suitable wind conditions were recorded in other pedestrian areas immediately around the proposed building. The proposed wind conditions were monitored in pedestrian areas along the perimeter of the development site, including Olympic Boulevard, the Century Plaza Hotel and the intersection of Avenue of the Stars and Constellation Boulevard. Based on the analysis of the results at these locations, wind conditions would be comfortable for standing or walking. In a Report dated February 8, 2002, RWDI summarized the potential effects of the proposed building on existing wind conditions along Avenue of the Stars in front of the Century Plaza Hotel and along the residential structures to the south across Olympic Boulevard and indicated that wind conditions in these areas were similar for both before and after conditions. Additionally, RWDI indicated that the Project wind impact at off-site locations, if any, would be less than significant.

The southeastern portion of the Street Level near the cultural facility experienced wind conditions comfortable for standing at most locations. The south edge of the terrace was the exception with wind conditions comfortable for walking during both seasons.

As in the existing condition, several locations in the area between and around the existing Century Plaza Tower buildings were considered uncomfortable. 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 and in the area between the Towers.

Overall, wind speeds throughout the proposed Project area would be considered acceptable for their planned activities. 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. As in the existing condition, several locations around the Century Plaza Towers were

²⁰ If winds speeds in excess of 55 miles per hour occur more than 3 times per year (0.1% of the time) at a location, the wind condition is considered unsafe. Source: RWDI, July 2001.

found to have uncomfortable wind conditions. These conditions were caused by the existing Century Plaza Towers configuration, and are not negatively affected by the proposed development. It is anticipated that no location within the Project redeveloped area would experience unsafe conditions; therefore wind would have a less than significant impact on the proposed Project. Additionally, the Project would result in a less than significant impact at off-site locations.

Mitigation Measures

As described above, the proposed Project would not result in a significant wind impact. Mitigation Measures are not required.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

The wind study prepared for the Project indicated that the proposed redevelopment has a building mass similar to that of existing conditions on site and is unlikely to have any negative impact on the wind environment in the area. Therefore, the project contribution to wind impacts would not be cumulatively considerable.

C. BIOLOGICAL RESOURCES

Existing Conditions

The Project site is a developed property which currently houses commercial structures, a plaza area, underground parking and associated facilities. Two eight-story commercial buildings occupy the northwest and southwest corners of the Project site (2020 and 2040 Avenue of the Stars respectively). Two 44-story office buildings occupy the northeast and southeast corners. The site is largely covered by impervious surfaces, and vegetation is limited to ornamental landscaping around the outside of the buildings and in planters throughout the Project site. The existing landscaping consists of a variety of ornamental/exotic type vegetation, including flowers, ground covers, shrubs, and trees.

Site investigations conducted by Envicom Corporation and SWA identified several different tree species located in the landscaped areas of the Project site (see **Appendix 1**). As shown on **Figure BR-1** ornamental fig (*Ficus sp.*) trees are present along the front of the 2020 and 2040 Avenue of the Stars buildings and along Constellation Boulevard adjacent to the 2020 Avenue of the Stars building. At the time of the investigations, the trees were not in flower; therefore, a determination of species could not be made. The arborist onsite indicated that they were likely to be either Morton Bay fig (*Ficus macrophylla*) or rustyleaf fig (*Ficus rubiginosa*). Along the perimeter of the site near the sidewalks are several London plane (*Platanus acerifolia*) trees. Along the southern edge of the 2040 Avenue of the Stars buildings is a circular area containing the following tree species: Canary Island pine (*Pinus canariensis*); laurelleaf snailseed (*Cocculus laurifolius*); and Strawberry (*Arbutus unedo*). Additionally this area has some *Xylosma congestum* shrubs. In large planted areas within the plaza levels are evergreen pear (*Pyrus kawakamii*), Brazillian pepper (*Schinus terebinthifolius*), goldenrain (*Koelreuteria paniculata*), coast redwood (*Sequoia sempervirens*), sweet gum (*Liquidamber styraciflua*), sweetshade (*Hymenoporus flavum*), Chinese flame (*Koelreuteria bipinnata*), and ornamental fig trees. No oak trees or other tree species native to Southern California exist onsite. The coast redwood is the only tree native to California located on the site, and its range extends from southwest Oregon, south to the Santa Lucia Mountains (the Coast Mountain Range between Monterey and Morro Bay).

None of the tree species nor any of the shrubs or other plants hold special status in local or regional plans, policies, or regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The existing ornamental vegetation does not provide habitat for any threatened rare, protected, or sensitive species. The California Natural Diversity Database has been reviewed for the Beverly Hills 7.5-Minute USGS Topographic Quadrangle, within which the Project resides. The results (**Appendix 6**) show several species of varying listing status throughout the quadrangle; however, the occurrences or location of the habitats is not within the immediate vicinity of the subject property.

The Project site is located in Century City, an intense urban environment, and has been developed for urban use for many years. The site is not located within any conservation plan areas. The proposed Project site does not currently provide habitat or features that are conducive to wildlife movement, and there are no wildlife migration corridors within the Project area. Almost the entire Specific Plan area has been developed with a variety of urban uses and impervious surfaces.

There are no water courses on the site or in the nearby vicinity. The area has been served by a system of storm drains and channels for over 30 years. It does not contain any riparian habitat or other sensitive natural community as identified in City or regional plans, policies, regulations by the California Department of Fish and Game or U.S. Fish and Wildlife Service. The subject property does not contain federally protected wetlands as defined by Section 404 of the Clean Water Act.

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guide (1998, p. G-5), the proposed Project would have a significant impact on biological resources if it resulted in:

Figure BR-1 Existing Onsite Trees

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern;
- The loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community;
- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species;
- The alteration of an existing wetland habitat; or
- Interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

Project Impacts

Within the area to be redeveloped, a total of 113 trees would be removed during construction. Of these, sixty-seven are mature trees with trunk diameters of twelve inches or greater and forty-six have trunk diameters of less than twelve inches (**Figure BR-1**). The majority (nearly seventy-five percent) of trees to be removed are either ornamental fig trees (*Ficus* sp.), laurelleaf snailseed (*Cocculus laurifolius*), or London plane (*Platanus acerifolia*) trees. The specific number of each tree species to be removed is shown in **Table V.C-1**. Other trees to be removed include Canary Island pine (*Pinus canariensis*), Brazilian pepper trees (*Schinus terebinthifolius*), evergreen pear trees (*Pyrus kawakamii*), goldenrain (*Koelreuteria paniculata*), coast redwood (*Sequoia sempervirens*), sweet gum (*Liquidamber styraciflua*), sweetshade (*Hymenoporum flavum*), and Chinese flame (*Koelreuteria bipinnata*).

Replacing this vegetation would be a diamond-shaped central lawn area, flanked by jacaranda and poplar trees along the northwest and southern edges. Additional rows of jacaranda trees would be planted between the lawn and the restaurant on the north side of the Project. Pine trees would be planted on the slopes to the south and east of the cultural facility and on the east and west sides of the garage access from Constellation Boulevard. Both the existing and proposed vegetation consists of non-native ornamental species and is not considered habitat for any state or federal listed endangered, threatened, rare, protected, candidate, or sensitive species or a Species of Special Concern.

The Project site does not contain any locally designated natural habitat or plant community, wetland habitat, or wildlife movement/migration corridors. The potential impacts associated with implementation of the proposed Project would be the loss of mature trees and landscaping throughout the site. The loss of ornamental landscaping is potentially significant. Implementation of mitigation measure BR-1 would reduce this impact to a less than significant level.

Mitigation Measures

- BR-1** Prior to the issuance of a grading permit, a plot plan prepared by a reputable arborist, indicating location, size, type, and condition of all existing trees on the site shall be submitted for approval to the Department of City Planning and the Street Tree Division of the Bureau of Street Services. All trees in the public right-of-way shall be subject to the current Street Tree Division Standards. The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site on a 1:1 basis, shall be required for unavoidable loss of trees greater than 12" diameter at breast height on the site, and to the satisfaction of the Street Tree Division of the Bureau of Street Services and the Advisory Agency.

Table V.C-1 Existing Onsite Trees to be Removed

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts to biological resources after mitigation.

Cumulative Impacts

The Environmental Setting Section (Section IV) provides a list of related projects that are planned or are under construction in the Project area. Most of the development planned for the area is within the intensely developed portions of West Los Angeles, Century City, and Beverly Hills. The proposed Project does not result in impacts to any valued biological resource, and therefore would not contribute to any cumulative effects.

D. CULTURAL RESOURCES

Existing Conditions

This Section is based upon the Cultural and Historical Evaluation report prepared by Historical Resources Group (HRG), dated January 16, 2002 (**Appendix 17**). This report provides a brief discussion of the Project site within several applicable historic contexts and an evaluation of the site according to local, State, and Federal criteria for historic designation.

The ABC Entertainment Center is located in Century City, a section of the City of Los Angeles that was master-planned in 1964 to 1966 on 180 acres of land purchased from Fox Studios by the Aluminum Company of America (Alcoa). The land was formerly the back lot of Fox Studios, and was a major real estate holding and one of the studio's most valuable assets. The entire Fox holding was a rectangle oriented north-to-south and bounded (using contemporary street names) by Santa Monica Boulevard to the north, Pico Boulevard to the south, Century Park West to the west, and Century Park East to the east. The parcel was divided into four quadrants by major cross streets, with Olympic bisecting the site from east to west and Avenue of the Stars bisecting it from north to south. The quadrant south of Olympic and west of Avenue of the Stars was retained by Fox and it remains the historic Fox Studios lot. The remaining three quadrants were developed by Alcoa as Century City.

Century City was conceived as a "city within a city," a 180-acre site master planned by Charles Luckman Associates that would contain high rise office space, high rise and low rise condominium and apartment buildings, a shopping mall, an 800-room hotel, and cultural-entertainment facilities all connected by landscaped boulevards, bridges, and tunnels oriented to pedestrians. Among the first buildings developed were the "gateway" buildings flanking the north end of Avenue of the Stars (moderate-rise buildings clad in aluminum panels and glass), the Century Plaza Hotel just north of the center of the cross axis, and residential towers at the south end at Olympic Boulevard. The future ABC Entertainment Center was aligned with the hotel to the west and the future site of the twin office towers to the east. The residential buildings were concentrated in the southeast quadrant, south of Olympic Boulevard.

The portion of Century City planned in the 1960s to contain the "Cultural Center," among other uses, was a 12-acre site, originally designated Block 8 and eventually named the "Theme Plaza", occupying six percent of Century City's acreage. The Theme Plaza was to contain a large office building over fifty stories tall (a significant size in a city where height had been capped at 150 feet (approximately 13 stories) until 1957) towering over an open plaza that was flanked by two buildings, one holding a legitimate theater and the other holding multiple cinema auditoriums. The ABC Entertainment Center contains low-profile buildings on a small percentage of the overall land of Century City, less than three percent.

A review of historic references, conducted by Law/Crandall, indicates the site was occupied by oil wells as early as 1910 (**Appendix 7**). Aerial photographs from 1930 show the site as undeveloped land occupied by three oil wells. Documents reviewed at the California Division of Oil and Gas (CDOG) indicate that the wells were properly abandoned prior to 1940. An aerial photograph from 1961 shows the site as undeveloped but may have served as a boxed tree storage yard in the early 1960's. Aerial photographs from 1966 to 1969 show a majority of the site covered with an asphalt parking lot.

Excavation for the existing structures at 2020 and 2040 Avenue of the Stars commenced in 1969. Aerial photographs from 1971 show some of the lower parking levels constructed and some of the steel framework for the ABC Entertainment buildings (Law/Crandall, 1997, updated 2001).

The two principal buildings that flank the sunken plaza were designed as a visual gateway to the single office tower that was envisioned for the east half of the block. The concept of a single tower was later replaced by the triangular-plan twin towers realized in the early 1970s and designed by Minoru

Yamasaki, arguably the most distinguished architect to contribute buildings to Century City. The Century City Hotel to the west of the Entertainment Center is also the work of Yamasaki, completed in 1966.

The ABC Entertainment Center can be evaluated within several contexts: as a live theater and arts complex in Los Angeles and in connection with the Shubert organization; as an example of late Modern architecture; and as a component of the Century City Master Plan. The Center is discussed briefly within each of these contexts below.

Live theater in Los Angeles and the Shubert Organization

The American Broadcasting Company (ABC) and the Shubert Theater were the original tenants of the ABC Entertainment Center. In the Los Angeles Times at the time of the ABC Entertainment Center's opening, critic Dan Sullivan asked, "How big is the audience for Broadway-style, Shubert-style theater in Los Angeles?" (Los Angeles Times, 8/17/70, Cal., p. 1)

The establishment of the Shubert Theater in the ABC Entertainment Center was based on the assumption that there were existing but untapped audiences for live theater on the west side "who wouldn't come all the way downtown to the Music Center but might to Century City," as critic Dan Sullivan stated in the Los Angeles Times (8/17/70, Calendar, p. 24). The Music Center was a project of the County of Los Angeles and was built between 1964 and 1969, at roughly the same time as the planning of the ABC Entertainment Center. The success of the Shubert Theater was limited by the available audiences and never did achieve the success of comparable establishments such as the Music Center in downtown Los Angeles.

The Shubert organization had been established in the live theater world for over 70 years by the time they came to Los Angeles. The person behind the expansion to Los Angeles was Lawrence Shubert. Lawrence, who was the heir to his uncles Lee Shubert and Jacob J. Shubert, as well as to Sam Shubert who had been the father of the organization. These three men founded the company around 1900. By 1970 they were known mainly as the owners of much of the theater real estate on Broadway. As of 2001, they owned and operated 23 theaters nationwide. The Los Angeles Times in 1970 stated that the Shuberts ". . . remain the dominant landlord on Broadway and the road. Once, the Shuberts were big producers as well as landlords. They presented more than 500 shows in their time. . ." implying that this era (the years of their most influential work) had ended long before 1970. The establishment of the theater in Los Angeles by the Shubert Organization in 1971 is not a local example of an important nationwide phenomenon as are some of those Shubert properties established in earlier decades. This era in the overall history of the Shubert Organization is too recent to properly evaluate within a historic context.

The ABC Entertainment Center is not strongly associated with the activity of the Shubert organization during a significant period of its history and is not prominent enough in theater in Los Angeles, or old enough to be considered historic. Therefore, it would not be considered eligible for listing in any National, State, or Local historic listing based on its associative value or for its "contribution to the broad patterns of our history," as National Register Criterion A requires (National Register Bulletin 15, page 12).

Architecture of the ABC Entertainment Center

Most of the architecture in Century City was produced during the initial decade of development from 1964 to 1975. Several more high rise buildings were completed in the 1980s. The architects who contributed major buildings to Century City were the most respected corporate commercial architects of the period, including Daniel Mann Johnson and Mendenhall (DMJM; Anthony Lumsden and Cesar Pelli); William Pereira Associates; Minoru Yamasaki; Albert C. Martin and Associates; Skidmore, Owings, and Merrill; and Welton Becket Associates. Two of the more distinguished, or at

least unique, buildings in Century City are Minoru Yamasaki's Century Plaza Hotel (one of the earliest buildings, 1966) and Century Plaza Towers (completed in 1975). The ABC Entertainment Center is situated between these buildings along the east side of Avenue of the Stars, the main spine of Century City.

The ABC Entertainment Center was designed by architect Henry George Greene and completed in 1971. Greene maintained offices in New York and Los Angeles. The site's landscape architects' work is better-documented; the landscape design for the complex was by Sasaki, Dawson, and DeMay who also redesigned Boston's Copley Square in 1966-1969. Much of the original landscaping around the perimeter of the complex, such as the plantings on the west terraces, is intact.

In their book *Los Angeles: An Architectural Guide* (Gibbs Smith, 1994), architectural historians David Gebhard and Robert Winter noted ten individual buildings at Century City, among which was the ABC Center. Their entire assessment of ABC reads, "Big and dull -- mildly Brutal below, crisper above" (133). "Brutal" referred to "New Brutalism," the style of later Modern architecture that was mainly practiced in Europe and usually in institutional settings, such as hospitals, universities, and state-sponsored housing. New Brutalism is characterized by block-like and sometimes monumental massing, deep shadows from large inset window openings, stark exterior materials such as raw concrete or brick, and a relationship between buildings and largely unplanted plazas and terraces. The 1950s and 1960s were its most significant period. The ABC Entertainment Center is a late example of the style, removed from the building types of its roots.

The original plans for the "Theme Plaza" (site of the ABC Entertainment Center) and the Music Center in downtown Los Angeles were both developed by Welton Becket Associates, among the few most significant firms working in the Corporate Modern and other late Modern styles in Los Angeles. Welton Becket Associates appears to have created the scheme for the "Theme Plaza"; however, the design itself was developed by others with only the rudiments of the Welton Becket concept -- two low, block-like buildings flanking a plaza -- retained in the later design stages. By contrast, the Music Center was fully developed by Welton Becket Associates.

There have been fairly obtrusive alterations made to the complex over the years in order to adapt it to current accessibility standards and provide improved circulation. The major exterior space, the sunken plaza, has been the most obvious site of exterior alterations.

The ABC Entertainment Complex is not associated with a significant architect and is not an important or strongly characteristic example of its architectural style. Therefore, it would not be considered eligible for any National, State, or Local historic designation based on National Register Criterion C, which requires that a property must "embody distinctive characteristics of a type, period, or method of construction; represent the work of a master; (or) possess high artistic value" (National Register Bulletin 15, page 17).

ABC Entertainment Center as a component of the Century City Master Plan

Century City was one of several planned communities that were developed on large, previously uninhabited or underdeveloped tracts of land in the Los Angeles area during the 1960s. During this period, movie studios were selling their back lots for development, including Universal and Fox. Century City, formerly the Fox Studios back lot, was conceived as an urbanized center for West Los Angeles, while other master planned areas in the region were focused on creating primarily residential environments, low in density and on much larger sites than Century City.

Most of the buildings from Century City's first decade of development are intact. However, there has been a large amount of infill in the area of additional office towers that for the most part dwarf and/or outnumber the original buildings. The original plan is discernable and does represent 1960s master planning principles, with the location of large signature buildings interspersed among wide

boulevards, fountains, multi-level plazas, and underground concourses. However, the plan has served mainly as a framework for future development, as intended, and the area is no longer representative of the period 1966-1975, from the year the master plan was at its most developed and the first buildings were constructed to the end of the first phases of construction.

Although the Century City Master Plan was designed by significant architects and planners, many of the component buildings themselves have been modified over the years and the presence of so many new structures keeps the area from being a discernable historic district, where buildings and features from the period of significance would have to predominate. Therefore, the area would be unlikely to qualify under National Register criteria for its significance in planning history and would not be considered eligible for any National, State, or Local historic designation and the ABC Entertainment Center would not be considered a contributing building within any such district.

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guide (1998), the proposed Project would have a significant impact on cultural resources if the Project resulted in:

- The permanent loss of, or loss of access to, a paleontological resource, where the paleontological resource is of regional or statewide significance; or
- Disturbance, damage, or degradation of an archaeological resource associated with an event or person of recognized importance in California, American prehistory, of recognized scientific importance, or is at least 100-years-old and possesses substantial stratigraphic integrity; or
- Demolition of a significant resource; or
- Relocation that does not maintain the integrity and significance of a significant resource; or
- Conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Project Impacts

The ABC Entertainment Center does not meet the criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, or the list of City of Los Angeles Historic-Cultural Monuments. The property is an original part of the Century City Master Plan, but the center itself is different from the original intent of the master plan. The buildings and the complex lack architectural distinction, have not played a significant role in local history, and are not a part of an established historic context. The Theme Plaza was not developed as a true "cultural center" in the language of the 1966 iteration of the master plan, and is not a cultural center in the sense that the Music Center in downtown Los Angeles clearly is. It was rather one of two entertainment and dining venues that were developed in Century City, one at the Theme Plaza and the other within the shopping center in the northwest of Century City. Because it has no historic, architectural, or cultural significance, the ABC Entertainment Center is not a historic property.

The applicant does not propose to remove the existing six-level subterranean parking structure. Excavation for the Project would consist of marginal subsurface disturbance associated with strengthening the existing foundation to support the structure within a smaller footprint as compared to existing conditions. Columns and footings would be expanded appropriately. As designed, the Project would modify approximately 74 columns. The Project would not excavate below the fill level of the 1969 excavation. Therefore, the proposed Project would not encounter any archaeological or paleontological resources if any did exist, which have not been previously disturbed.

Mitigation Measures

Based on stated thresholds of significance, no significant impacts to historic, archeological or paleontological resources would occur. Therefore, no mitigation measures are required or recommended.

Significant Project Impacts After Mitigation

The proposed project would not result in significant unavoidable impacts on cultural resources.

Cumulative Impacts

The Environmental Setting Section (Section IV) provides a list of related projects that are planned or are under construction in the Project area. Related projects at Harvard Westlake Middle School, and Palazzo Westwood would result in significant adverse historical impacts after mitigation. The proposed Project does not result in impacts to cultural resources, and therefore would not contribute to any cumulative effects.

E. GEOLOGY

Existing Conditions

Geologic Units and Structure

The Project site is located in Century City, which is situated on the southern side of the Santa Monica Mountains near the intersection of two geologic provinces: the Transverse Ranges and the Peninsular Ranges. The Santa Monica Mountains and associated east-west trending "frontal fault system" (including the Malibu, Santa Monica, Hollywood, and Elysian Park faults) form the southern boundary of the Transverse Ranges geologic province. The Transverse Ranges are named for this east-west trend, which is 'transverse' to the dominant northwest-southeast trending mountain ranges in the region.

The site is located within the northernmost portion of the geologic area known as the Los Angeles Basin (Basin). A thick sequence (several thousand feet) of Tertiary age sedimentary rocks underlies this portion of the Basin.²¹ From oldest to youngest, these rocks are represented by the Topanga Formation, Monterey Formation (also known as the lower Modelo Formation), Modelo Formation, and Fernando Formation (Dibblee, 1991; Lamar, 1970). Each formation is comprised of rock layers alternating between sandstone, conglomerate and siltstone.

Erosion of Tertiary rocks resulted in the formation of relatively flat areas in the Basin. Deposition during Quaternary (Recent and Pleistocene) time covered these geologic structures with alluvial deposits from local mountains.²² Beneath the surface these older alluvial deposits (Qoa) merge with the Upper Pleistocene Lakewood Formation, and reach a thickness of approximately 40 feet or more in the Project area (Department of Water Resources (DWR), 1961). DWR (1961) designates surface exposures at the site as Lakewood Formation. Younger surficial alluvial deposits (Qa of Dibblee, 1991) are found immediately west of the site. These younger deposits range in thickness from 5 to 35 feet and are composed of primarily unconsolidated and uncemented gravels, sands, silts, and clays (DWR, 1961).

The Lakewood Formation is an aquifer at depth.²³ Its initial layers are composed of upper Pleistocene older alluvium. The Lakewood Formation consists of primarily unconsolidated discontinuous gravel and sand layers, interbedded with silt or clay layers. The Exposition Aquifer, present in the upper (shallow subsurface) part of the Lakewood Formation, is comprised of sand and gravel beds, which are separated by silt and clay deposits.

Soils at the Project site have been modified and disturbed during excavation associated with construction of the subterranean parking structure. It is unlikely that undisturbed native soils are present at the site.

Stratigraphy

In October, 2001, Law Crandall (**Appendix 7**) conducted a report of geotechnical consultation for the proposed development at the Project site. Subsequently, a report of geologic-seismic hazards

21 Geologic time since the formation of the Earth is divided into several periods each of which is characterized by the formation of a distinctive rock system. The Tertiary Period began approximately 65 million years before present and ended approximately 1.6 million years before present.

22 The Quaternary Period began approximately 1.6 million years before present and extends to the present day. Geologic periods are divided into epochs, each of which is characterized by the formation of a distinctive rock system. The Pleistocene Epoch formed the earlier part of the Quaternary Period and extended from approximately 1.6 million years to 11,000 years before present. The Recent Epoch, also known as the Holocene Epoch, formed the latter part of the Quaternary Period, began at the end of the last Ice Age, and has extended from approximately 11,000 years before present to the present day.

23 California Department of Water Resources (DWR), 1961. Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County, Appendix A, Ground Water Geology. Bulletin No. 104.

evaluation was prepared by LAWGIBB Group (November 2001) (**Appendix 7**) for the subject property.

Thirty-seven borings were drilled as part of prior investigations conducted at the site in 1967 and 1969. The borings indicated that artificial fill materials had mantled and were removed during the construction of the existing buildings and the parking garage. The Project site is primarily underlain by Pleistocene age alluvial deposits (California Division of Mines and Geology, 1998). Alluvial deposits below the parking garage are primarily fine sand with varying amounts of gravel and cobbles. Pleistocene age alluvial deposits were found 50 to 85 feet thick and are underlain by approximately 650 feet of Pleistocene age sediments of the San Pedro Formation. The San Pedro Formation is underlain by Tertiary age sedimentary rocks estimated to extend to a depth of 13,000 feet beneath the site (Yerkes, 1965; California Department of Water Resources, 1961; Poland, 1959). Cemented layers up to five feet in thickness were encountered at various depths.

Groundwater

The Santa Monica Mountains represent the northern boundary of the Los Angeles County Coastal Plain. Along the base of the Santa Monica Mountains, Quaternary sedimentary layers are faulted and folded. East of the Project area, sedimentary layers are folded downward into a geologic structure known as the Hollywood Syncline. East of the Newport-Inglewood fault zone, this syncline forms the Hollywood Basin, a groundwater basin parallel to the Santa Monica Mountain front. The Santa Monica Basin extends from the Pacific Ocean, east to the Newport-Inglewood fault zone and from the Santa Monica Mountains south to the Ballona Escarpment (DWR, 1961). The Project site overlies the Santa Monica Hydrologic Subarea of the Los Angeles County Coastal Plain Hydrologic Subunit.

Groundwater in the Santa Monica Subarea is recharged from percolating precipitation, and from streams originating in the Santa Monica Mountains flowing into the Quaternary alluvial sands and gravels. The interbedded nature of clayey zones in the area would inhibit percolation and vertical migration of surface water, thus allowing groundwater accumulation in shallow perched zones. Urban development now covers much of the land surface with structures and pavement, thus limiting groundwater recharge from precipitation sources.

According to the California Division of Mines and Geology (1998), the historic high ground-water level beneath the site ranges in depth from 30 to 40 feet below the existing ground surface. However, groundwater was not encountered during the previous borings at the site, which were drilled to a maximum depth of approximately 45 feet below the lowest parking level. Ground water was also not encountered in the previous borings at the adjacent site of the Century Plaza Towers, which was drilled to a maximum depth of 105 feet below the lowest level of the parking garage. Although ground water was not encountered, water seepage was observed in several borings drilled within the Project site and the adjacent Century Plaza Towers area. Within the Project site, seepage was observed in two previous borings, approximately five and 16 feet below the bottom of the lowest parking level. Water seepage was observed mostly near and above the lowest parking level in several borings at the adjacent Century Plaza Towers. Although water seepage below the lowest parking level was not noted in most of the previous borings, the majority of borings extending to such depths were drilled using drilling mud that makes it difficult to establish ground water levels and areas of seepage.

In northern and eastern portions of the Santa Monica Subarea, groundwater was present in unconfined aquifers (such as the Exposition Aquifer). In other areas of the basin, as well as in deeper aquifers, groundwater is confined. Flowing wells from deeper Miocene²⁴ sediments were once known to exist in the eastern part of the Hollywood Basin (DWR, 1961).

²⁴ The Miocene Epoch formed part of the upper Tertiary Period and extended from approximately 24 to 5 million years before present.

Faulting and Seismicity

Faults are fractures or lines of weakness in the earth's crust, along which rocks on one side of the fault are offset relative to the same rocks on the other side of the fault. Sudden movement along a fault results in an earthquake. Faults that allow plates or landmasses to move horizontally past each other are called strike-slip fault zones (e.g. San Andreas, San Jacinto, Elsinore, and Newport-Inglewood). In contrast, mainly vertical movement occurs along normal, reverse and thrust fault zones. Buried low angle thrust faults that do not rupture the surface are known as blind thrusts (Elysian Park and Compton Blind Thrusts). Faults exhibiting both vertical and horizontal movement are oblique faults (e.g. Santa Monica-Hollywood, Cucamonga, Palos Verdes, and Raymond).

Plate tectonics, and the forces that cause these plates to move within the earth's crust, affect geology and seismicity throughout Southern California. The San Andreas Fault system forms the boundary between two of these major plates, the North American and Pacific plates. These two plates are in constant motion, with the Pacific Plate moving northwest relative to the North American Plate.

The tectonic regime of Southern California is marked by the interaction between two distinct systems of geologically young fault systems, the northwest trending San Andreas Fault System and the west trending faults of the Transverse Ranges. A major bend in the San Andreas fault occurs northwest of Los Angeles. As a result, a major zone of north-south compression exists in the Southern California region, creating the mountains within the Transverse Ranges. The most obvious local features are the Santa Monica and San Gabriel Mountains.

During the past 230 years (1769 to 1999), approximately 20 notable earthquakes (with a magnitude (M) of 6.0 or greater on the Richter Scale) were recorded in Southern California. Six of these events equaled or exceeded M7.0. The two largest earthquakes in the Los Angeles Basin during recent times are the January 1994 M6.7 Northridge and February 1971 M6.6 San Fernando (also commonly known as the Sylmar) earthquakes.

During Pliocene²⁵ and Quaternary times, tectonic stresses in the Los Angeles Basin caused compression, resulting in extensive folding and thrust faulting. Destructive compressional earthquakes, such as the 1971 San Fernando, the 1989 Whittier, and the 1994 Northridge earthquakes, along with numerous smaller compressional events, are reminders that active reverse and thrust faulting activity continues. The Elysian Park and other buried blind thrust faults, along with the frontal fault system and other oblique reverse fault zones have a high potential to generate large earthquakes in the Los Angeles Basin.

Historic occurrences of strike-slip style earthquakes in the Basin are less common, with the 1933 Newport-Inglewood (Long Beach) earthquake being the largest local event. The Whittier-Elsinore, San Andreas, and San Jacinto Fault Zones are strike-slip faults with the potential to generate major earthquakes within the region. Strike-slip fault zones caused several major earthquakes in Southern California during the 1800s. Hundreds of faults underlie much of the urban and rural areas of Southern California. The California Division of Mines and Geology (CDMG) has established the Alquist-Priolo Earthquake Fault Zoning program, which classifies the potential for a known earthquake fault to produce surface rupture. The Alquist-Priolo program has three classifications, which include: active, potentially active and inactive. An active fault has had surface displacement within the Holocene period, or approximately the last 11,000 years. A potentially active fault has had surface displacement within the Quaternary age deposits, or within the last 1.6 million years. Inactive faults have not produced surface displacement within the last 1.6 million years. As determined by the CDMG, many active, potentially active and inactive faults underlie the Los

25 The Pliocene Epoch was the most recent epoch of the Tertiary Period and extended from approximately five to two million years before present.

Angeles Basin. The subject property is not located within an Alquist-Priolo Earthquake Fault Zone for surface rupture hazards.

The nearest Alquist-Priolo Earthquake Fault Zone to the subject property is located approximately 2.75 miles (**Figure GS-1**) southeast of the Project site, along the Inglewood fault in the Newport-Inglewood fault zone. Based on a prior investigation by Law Crandall (2001), there are no known faults located on the subject property. The active Santa Monica fault is located approximately 0.28 miles (1,500 feet) to the north, and the Newport-Inglewood fault zone is approximately 1.1 miles east of the Project site. The Project site does not lie within an Alquist-Priolo Earthquake Zone. No known fault trace was identified on the site (Law Crandall, 2001).

The Santa Monica-Hollywood fault zone is comprised of two faults extending from the coastline in Santa Monica on the west to the Hollywood area on the east. The Hollywood fault is the eastern segment of the fault zone and trends east-west along the base of the Santa Monica Mountains, north of the Hollywood syncline and approximately 2.0 miles north of the site. The Santa Monica fault is the western segment of the Santa Monica-Hollywood fault zone and trends east-west from the Santa Monica coastline on the west to the Beverly Hills area on the east. Both faults are poorly defined near the surface, and have been located through collection of geophysical data, water level information and fault trenching studies. Due to insufficient data regarding the exact location of these faults at the ground surface, Alquist-Priolo Earthquake Fault Zones have not been established for these faults. However, both the Santa Monica fault and the Hollywood fault are considered active by the California State Geologist. City of Los Angeles Planning documents identify the Hollywood fault as an active fault for planning purposes.

The Northridge thrust is an inferred deep thrust fault that is considered the eastern extension of the Oak Ridge fault. The vertical surface projection of this thrust fault is located approximately 6.2 miles north of the site at the closest point. The Northridge Thrust is located beneath the majority of the San Fernando Valley and is believed to be the causative fault of the 1994 Northridge earthquake. This thrust fault is not exposed at the surface and does not present a potential surface fault rupture hazard. However, the Northridge Thrust is an active feature that could generate future earthquakes.

The Compton-Los Alamitos Thrust is an inferred blind thrust fault located within the south-central portion of the Los Angeles Basin. The closest edge of the vertical surface projection of the buried thrust fault is located about 7.4 miles southeast of the Project site. This thrust fault, like the Northridge Thrust, is not exposed at the surface and does not present a potential surface rupture hazard; however, this thrust fault is considered active and could also generate future earthquakes.

The Elysian Park Thrust, previously defined by Hauksson (1990) as the Elysian Park Fold and Thrust Belt, is another deep thrust fault located to the east of the subject property. Now believed to be smaller than originally estimated, the Elysian Park Thrust is located primarily in the central Los Angeles Basin, and the vertical surface projection of the fault is approximately 11.4 miles east-southeast of the subject property. The structure is not exposed to the surface and does not present a potential surface rupture hazard.

The Overland fault, located approximately 1.1 miles to the west, is the closest potentially active fault to the site. This fault trends northwest between the Charnock fault and the Newport-Inglewood fault zone. It extends from the northwest flank of the Baldwin Hills to Santa Monica Boulevard in the vicinity of Overland Avenue.

The Charnock fault is a northwest trending fault that runs parallel to the Overland fault and the Newport-Inglewood fault zone. The youngest deposits displaced by this fault are early Pleistocene age. Therefore, the fault is classified as potentially active by the CDMG. The closest segment of the Charnock fault to the Project site is approximately 3.3 miles to the south-southwest.

Insert Figure GS-1 RECENTLY ACTIVE FAULTS AND MAJOR EARTHQUAKE

Hill et al. (1979) conclude that movement occurred along the Santa Monica fault during part of the Pleistocene, and that movement during Holocene time cannot be excluded on the basis of present knowledge. Recent micro-seismic activity presents strong evidence that subsurface fault traces within the Santa Monica Fault Zone in the area are actively accumulating and releasing tectonic strain (Hill et al., 1979). Based on available data, this fault is classified as potentially active. If a surface scarp identified by Webber et al. (1980) were a surface expression of the Santa Monica fault that is disrupting Holocene deposits, this fault would be classified as active.

The Elysian Park Fold and Thrust Belt (hereinafter the Elysian Park fault) is a deeply buried low angle reverse or thrust fault that underlies the Los Angeles Basin. Its existence onshore, along with other related blind thrust faults, is inferred from the clustering of data from deep earthquakes, from oil well log data and from geophysical data. Offshore geophysical data also provides evidence for these low angle reverse faults. Biddle (1991) presents a geologic model, showing these low angle reverse faults.²⁶

The Elysian Park fault's possible surface expression is located north and northeast of the site. It follows a line of hills extending from Whittier through Montebello, Elysian Park, the Cahuenga and Sepulveda Passes to Malibu and Point Dume (Reich, 1989). Both the M5.9 Whittier Narrows earthquake of October 1, 1987 and the M4.5 Montebello earthquake of June 12, 1989 resulted from movement on this fault.

It has been postulated that the Elysian Park fault and other related thrust faults are capable of generating earthquakes of M6.5 to M7.5, but the probability of any earthquake occurring is unknown. An earthquake of these magnitudes will generate very strong or intense ground motion at the site, similar to those experienced during the 1994 M6.7 Northridge earthquake.

Liquefaction

Strong ground motion can cause various types of ground failures, including liquefaction. Liquefaction occurs during extended periods of ground shaking, when pore water pressures increase and water-saturated sediments are temporarily altered from a solid to a liquid state. Liquefaction is most likely to occur in unconsolidated, granular sediments that are water saturated less than 30 feet below the ground surface (Tinsley et al., 1985).

Landslide and Subsidence

The proposed Project is located within an area susceptible to landslides, as determined by the City of Los Angeles Slope Stability Study and the County of Los Angeles Landslide Inventory Study. The subject property has this classification due to its location relative to the southern flank of the Beverly Hills portion of the Santa Monica Mountain Range. Regardless, the subject property and surrounding area are comprised of gentle sloping topography with no natural steep slopes located adjacent to the property.

The site is within the Beverly Hills Oil Field. The historic withdrawal of fluids (such as petroleum and ground water) has been known to cause ground subsidence. Documented subsidence associated with petroleum and groundwater extraction (and on-going tectonic processes in the Los Angeles Basin) has occurred within the boundaries of the Beverly Hills Oil Field.

Tsunami, Seiches and Seismically Induced Reservoir Failure

The site is not in a coastal area. Therefore, tsunamis (seismic sea waves) are not considered a significant hazard to the site.

26 Biddle, K. T., 1991. "The Los Angeles Basin - An Overview," Active Margin Basins. AAPG Memoir 52.

The site is not located downslope from any large bodies of water that could adversely affect the site in the event of an earthquake-induced dam failure or seiches (wave oscillations in an enclosed or semi-enclosed body of water). The site is in an area of minimal flooding potential (Zone C) as defined by the Federal Insurance Administration.

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guide (1998), the proposed Project would normally result in a significant impact to geology if the Project:

- Would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Project Impacts

Surface Rupture

The site is not within a Alquist-Priolo Earthquake Fault Zone for surface fault rupture hazards. The closest Alquist-Priolo Earthquake Fault Zone, established for a portion of the Inglewood fault of the Newport-Inglewood fault zone, is located approximately 2.73 miles to the southeast of the site. Based on the available geologic data, active or potentially active faults with the potential for surface fault rupture are not known to be located directly beneath or projecting toward the site. Therefore, the potential for surface rupture due to fault plane displacement propagating to the surface at the site during the design life of the Project is considered low. No significant Project impact would occur.

Seismic Groundshaking

Due to the seismically active nature of Southern California, the site could potentially be subject to strong ground shaking from earthquakes produced by faults within the region. Potential impacts from seismic ground shaking are present throughout Southern California and would not be higher at the Project site than for most of the region. Also, the City of Los Angeles Uniform Building Code, revised since the 1994 Northridge earthquake contains construction requirements to ensure that habitable structures are built to a level of acceptable seismic risk. The proposed Project will be designed and built to provide life safety for occupants of the structure in the event of the strong ground motions, which are reasonably expected to occur in the vicinity of the Project site. As determined during the comprehensive geotechnical investigation for the proposed Project, Impacts associated with seismic shaking are considered potentially significant. However, Project compliance with applicable Uniform Building Code requirements would reduce impacts to a less than significant level.

Liquefaction

According to the California Division of Mines and Geology (1999), the City of Los Angeles Safety Element (1996), and the County of Los Angeles Seismic Safety Element (1990), the site is not within an area identified as having a potential for liquefaction. Groundwater was not encountered in previous borings within 50 feet of the ground surface. Additionally, the Pleistocene age sediments underlying the site are generally dense silty sand and firm clay and clay silts and are not considered prone to liquefaction. Therefore, the potential for liquefaction and the associated ground deformation beneath the site is considered to be low. The State Seismic Hazard Map (1999) for the Beverly Hills Quadrangle indicates that the immediate project vicinity is not susceptible to liquefaction.

Landslide and Subsidence

The lack of steep slopes located on and around the property precludes the potential for landslides. There are no known landslides in the area of the subject property, nor is there potential for other slope stability issues.

Between 1955 and 1970, documented subsidence beneath the site was approximately 0.2 feet (Hill et al., 1979). However, this subsidence is regional in nature and there is no evidence that differential settlement or damage to structures has occurred as a result of this phenomenon at the site or in the general area. Therefore, regional subsidence is not anticipated to adversely affect the structures at the site.

Mitigation Measures

- G-1** To reduce seismic risks, Project structures shall be designed and built in conformance with the current City of Los Angeles Uniform Building Code at the time of the building permit. Information about ground motion parameters included in the site specific geotechnical report shall be used as input for seismic design of the proposed Project.

Significant Project Impacts After Mitigation

Based on City standards of acceptable risk reflected in the City of Los Angeles Building Code and the performance review procedures of the Bureau of Engineering and Building and Safety, no significant geology impacts would occur as a result of the proposed Project after mitigation of potential groundshaking impacts.

Cumulative Impacts

Projects included under the related projects list would require municipal government approvals of design, and the implementation of mitigation measures, where needed. Significant cumulative grading and geotechnical impacts resulting from the potentially concurrent construction of the related projects are not anticipated.

The proposed Project and related projects would be subject to potentially severe ground motion during a severe earthquake. Based on Project development which would be constructed to adhere to the building codes and other locally imposed plans, cumulative seismic impacts would be reduced to less than significant levels. Related projects would not be exposed to a greater than normal seismic risk than other areas in Southern California. The Project would not in any way compound the effects of the related projects. Therefore, cumulative geology, soils, and seismic impacts would not be considered significant.

F. HAZARDS AND HAZARDOUS MATERIALS

A Phase I Environmental Site Assessment (1997) (**Appendix 8**) has been prepared by Law Crandall to identify the presence or absence of hazardous materials on-site, as well as perform a records check for identified sites containing significant quantities of hazardous materials or spill locations. An update to the original Phase I has been prepared by LAWGIBB Group (2001) (**Appendix 8**) to assess any change in conditions since the 1997 report. The update indicates that the findings of the 1997 report are representative of the existing conditions at the time of the update.

Existing Conditions

Hazardous Materials

Wells

The proposed Project is located within the historic boundaries of the Beverly Hills Oil Field (Wolfskill Oil Unit). The Phase I (1997, updated 2001) shows that three oil wells have been drilled on the site (Wolfskill 30, Wolfskill 43 and Wolfskill 44). The California Division of Oil and Gas indicated that all three wells were properly abandoned in the 1940's and were re-abandoned in 1970 when the existing buildings were built.²⁷

Hazardous Materials in General Maintenance

Operation of the existing facilities does not include the use of significant quantities of hazardous materials. Several products that are used and stored in small quantities for general maintenance purposes on-site could be hazardous if mishandled or spilled. Materials used for general maintenance include: hydraulic fluid, Nalco 2536 (a rust inhibitor for hot water treatment), window washer solution, turbine oil, air compressor fluid, Enzyme 80 (drain cleaner), large spill kit containers and automobile batteries. Containers storing these materials are located in a storage room near the loading docks on Level B of the parking garage. Waste oil and used oil filters from service equipment are removed by qualified specialists, Environmental Dynamics, under appropriate procedures. No indications of spills or leaks on the concrete slab were observed in any of the maintenance areas during the Phase I Assessment.

Asbestos Containing Materials

As part of the Entertainment Center's Asbestos Management Plan (AMP) there is an on-going hazardous materials abatement program for the entire site. Pursuant to this program, asbestos and other hazardous materials have been removed from the existing buildings for the past fifteen years. Asbestos Containing Materials (ACM) have been used for their acoustic, tensile, and fire resistant qualities in building materials since the 19th century. It was not until the 1970's that the inhalation of asbestos was recognized to pose a health threat for humans and its use in building materials prohibited. The two buildings to be removed during demolition are known to include ACM. Asbestos and other hazardous materials will continue to be removed from the existing buildings, according to the AMP guidelines for the site. This abatement program contemplates removal of asbestos from the existing buildings as part of the existing condition regardless of development of the new building.

Additionally, ACM's that have been removed as part of the on-going abatement program are temporarily stored on Level A of the parking garage and discarded regularly. According to the Phase I Assessment (2001), storage conditions are considered adequate. No evidence of release of the substances was observed.

²⁷ Geraghty and Miller, Inc.

South Coast Air Quality Management District (SCAQMD) Rule 1403 specifies work practice requirements to limit asbestos emissions associated with building demolition and renovation. Emissions of asbestos to outside air are to be prevented through several requirements as summarized below:

- Implementation of a thorough survey of the affected facility prior to any demolition or renovation activity, including inspection, identification, and quantification of all friable and certain non-friable ACMs;
- Notification of the SCAQMD of the intent to demolish any facility prior to any demolition or renovation activity at least 10 days prior to commencing with the activity;
- Removal of all ACMs prior to any demolition activity that would break up, dislodge, or similarly disturb the material;
- Use of prescribed procedures when removing or stripping ACMs; and
- Placement of all collected ACM waste materials in leak-tight containers or wrapping.

At least one on-site representative of the contractor removing the ACMs who has successfully completed the Asbestos Abatement Contractor/Supervisor course pursuant to the Asbestos Hazard Emergency Response Act must be present during any stripping, removing, handling or disturbing of ACMs. In addition, Rule 1403 requires the use of warning labels, signs, and markings to identify any asbestos-related health hazards created by the demolition activity.

Radon Gas

A literature review of radon gas accumulations was conducted as part of the Law Crandall Phase I analysis to determine site testing needs. In studies prepared by the United States Environmental Protection Agency (USEPA), levels of indoor radon were measured on a state by state basis. According to the survey, California indoor radon measurements range from less than 1.0 pCi/l (pico curies of activity per liter of air) to 29.1 pCi/l. The mean for California was 1.0 pCi/l. The USEPA recommends that action be taken at a level of 4 pCi/l or higher. On a local basis the results were reported per zip code within each state. The results for the subject zip code were not listed; however, the arithmetic mean for the region is 0.6 pCi/l.

Polychlorinated Biphenyl

Transformers have the potential to carry Polychlorinated Biphenyl (PCB) in the cooling oils. There are three transformers in each of two transformer station rooms located on Level B of the parking garage. Los Angeles Department of Water and Power (LADWP) personnel are the only individuals with access to these rooms. According to the LADWP, two of the transformers were installed in October 1973 and the other four were installed in April 1974. As part of the Phase I Assessment, cooling oils for the six transformers were tested for the presence of PCBs. The results of the tests showed PCB concentrations ranging from one to four parts per million (ppm). A PCB concentration of 50 ppm or less is considered acceptable.

Wastewater Discharge

Within Level F of the parking garage there are three sewer sump pits that receive wastewater from facilities located on Level B. Wastewater is pumped from the sump pits into the City's sewer system. Wastewater generated by uses above the street level drain directly in to the City's sewer system. The site has an Industrial Wastewater Discharge Permit for pumping wastewater from the sump pits into the municipal sewer system. Once a year the sump pits are cleaned and effluent from the cleaning process is removed from the site pursuant to legal disposal guidelines.

Car washing services in the parking garage, available to employees who work on-site, also generates wastewater. Water used to wash cars drains into an aboveground clarifier located on Level F of the

parking garage. The clarifier is cleaned twice a year and showed no signs of leaks or spills, according to Law Crandall (1997, updated 2001). Water from the clarifier is discharged under permit to the municipal sewer system. Water from the clarifier and the sump pits is sampled on a regular basis by the City of Los Angeles, Department of Public Works.

Based upon the findings of the Phase I study, summarized above, the existing presence of hazardous materials on the Project site does not create a significant hazard to the public or the environment.

Methane

The Project is located within the boundaries of the Beverly Hills Oil Field. Therefore, a Methane Assessment Report, dated October 9, 2001, (**Appendix 9**) was prepared by Camp Dresser & McKee, Inc. (CDM) to evaluate the potential for methane accumulation beneath and within the garage below the buildings, and to identify potential safety risks associated with construction and operation of the Project. Methane concentrations at the lowest level of the garage (Level F) are generally insignificant and not substantially elevated above background concentrations. However, elevated concentrations of methane exist in localized areas of the garage (Level F). Of the 214 locations analyzed, 14 locations yielded concentrations in excess of 10,000 parts per million volume (ppmv), or 1.0%V. Concentrations of methane at localized areas four to six feet above ground were less than significant, ranging from 100 to 500 ppmv, or 0.01% to 0.05%. Ceiling level methane concentrations within the garage were also tested, and no concentrations in excess of background air were detected. Enclosed spaces and rooms on Level F were tested for the presence of methane. Most locations yielded concentrations lower than general air space and all areas had methane concentrations less than 1.0%V. Two of the storage rooms contained elevated levels of methane concentrations of 0.7% to 0.8%V. These levels are below the lower explosive level, which is considered 5%V. The existing ventilation system for Level F was designed to meet the building code to remove hydrocarbon vapors emitted from automobile exhausts. The ventilation rate, with all supply and exhaust fans running, is 5.4 air changes per hour, or one air change every 11.2 minutes. This system, in conjunction with natural dilution and dispersion processes, appears to be effectively attenuating methane concentrations to non-problematic levels within Level F. Therefore, methane entering garage Level F is not accumulating to levels of concern and is not considered likely to reach explosive levels.

Soil below the concrete floor of the garage was sampled and tested for the presence of methane in soil gas at 61 different locations. The 61 boring locations were chosen to coincide with the location of the proposed new pilings. Twenty-five of the 61 test locations resulted in concentrations above 5%V. The elevated concentrations were found among three general areas:

- The southwest corner with concentrations ranging from 8% to 50%V;
- The central area, near the escalator lobby, with concentrations ranging from 6% to 50%V; and
- A smaller area in the northeast corner, with concentrations ranging from 8% to 31%V.

The highest concentrations of methane in soil gas were found along the southwestern wall facing Avenue of the Stars. The abandoned gas well, Wolfskill-44, is reportedly located in the southern portion of the Project area (Geraghty & Miller, 1987). It is not known if the Wolfskill-44 well is related to elevated concentrations of methane in soil gas. Records indicate that the well was properly abandoned in 1940 according to the Los Angeles Fire Department and, subsequently, re-abandoned in 1970 in compliance with appropriate state specifications at that time.

Methane rising vertically from depths below the garage floor may accumulate in sub-drain pipe, and allow lateral migration of methane into other areas prior to exiting at the floor seams or drains. Most of the elevated methane concentrations (greater than 1%V) observed in the garage are found near sub-drainage piping systems. Although these drains may serve to collect methane, the volume of methane is considered low. This conclusion is based on the lack of any significant concentration of

methane in the building air space. It is also important to note that there is an apparent cross-connection between the sub-drainage system and the positive pressure air ventilation shafts in the southwestern area of the garage, where elevated methane concentrations were detected below the garage floor. According to the methane study, it is not known if the sub-drainage system piping connections in this area are factors that contribute to elevated methane concentrations in this area.

BTEX Compounds and Hydrogen Sulfide

In addition to methane, aromatic volatile organics (BTEX) compounds and hydrogen sulfide concentrations were monitored in the CDM report. The results indicate that BTEX compounds were not detected at any sample location above the detection limit of less than 1.0 ug/L, with the exception of toluene (1.7 ug/L) and xylene (1.3 ug/L), which were detected at low concentrations. No significant hydrogen sulfide concentration was detected at any sampling location. The highest level detected was only 3 ppm. The standard threshold for toluene is 520 ppm and xylene is 210 ppm.

Regulatory Agency List Review

The site appears on the Emergency Response Notification System (ERNS) list as McDermott, Will and Emery, a law firm at 2029 Century Park East, Suite 3800. A spill involving chromium apparently occurred at 496 Bauchet Street, which is not the site. It is believed that the tenant on the site receives the documents related to the spill at the Bauchet Street facility and is, therefore, listed as the mailing address. The Phase I assessment does not consider this to represent an environmental concern to the site (Law Crandall 1997, updated 2001).

The site appears on the Site Enforcement Tracking System (SETS) list as Space Lok, Inc. at 2049 Century Park East. The SETS list identifies parties with the potential financial responsibility for remediation of uncontrolled hazardous waste sites. The listing indicates an association with the San Fernando Valley (Area 1) site. The San Fernando Valley groundwater contamination plume is over ten miles from the site. Based on this information, the site is listed only as a mailing address for issues related to this hazardous waste site, and therefore, does not represent a concern to the site.

The site appears on the Resource Conservation and Recovery Act (RCRA) Notifiers list as Pacific Building Management/ABC Entertainment at 2040 Avenue of the Stars. A permit was issued in 1989 for asbestos containing waste. It appears that this listing is related to asbestos material generated during an abatement project at the subject building, which is now completed. This does not represent an environmental concern to the site.

The site appears on the Hazardous Waste Information System (HWIS) list as the following:

- Pacific Building Management/ABC Entertainment Center at 2020 and 2040 Avenue of the Stars;
- Hospital Satellite Network at 2020 Avenue of the Stars, Suite 550;
- Twenty-Twenty The Club at 2020 Avenue of the Stars;
- Software and More One Hour Photo at 2040 Avenue of the Stars, Suite 10;
- Westside Entertainment Center at 2040 Avenue of the Stars; and
- Delta Towers Joint Venture at 2029-2049 Century Park East.

Most of the listings are related to permits issued for the removal of asbestos containing waste. A permit was issued for the One Hour Photo facility for photochemical waste. Permit details were not supplied for the remaining listings. It is believed that the other permits were issued for other types of wastes, such as waste oil. The appearance of a facility on the RCRA list merely indicates that the facility has generated and transported hazardous waste and does not necessarily imply that an environmental condition exists. Based on observations during the site reconnaissance by Law Crandall, the RCRA listings for the site do not represent an environmental concern.

On-site Aboveground/Underground Storage Tanks

The site appears on the Underground Storage Tank (UST) list as Century Plaza Towers at 2029-2049 Century Park East. Information on the list indicates a 2,000-gallon UST was installed at the site in 1975. Records at the Los Angeles City Fire Department indicate that a permit was issued in April 1995 for the abandonment of a 2,000-gallon UST, and a hazardous waste manifest was completed in March 1995 for an empty storage tank and associated fuel piping. Soil samples taken from the tank excavation during the 1995 diesel tank removal were analyzed for aromatic volatile organics (BTEX), total petroleum hydrocarbons (TPH, as diesel) and lead. BTEX and diesel were not detected above the laboratory limits. Low levels of lead ranging from 6.7 mg/kg (parts per million) to 17 mg/kg were detected. These concentrations of lead were consistent with background levels and not considered to be a concern (Law Crandall, 1997, updated 2001).

The 2,000-gallon UST was replaced by a 4,000-gallon Aboveground Storage Tank (AST) located in a storage room on Level B of the parking garage (under the south tower of the Century Plaza Towers). According to the Los Angeles City Fire Department Underground Tank Unit, there are no reports of leaks or soil contamination associated with the removed tank or its infrastructure. Additionally, the site does not appear on the Leaking Underground Storage Tank List. The Law Crandall (1997, updated 2001) report indicated that all components of the storage facility appeared to be free of staining and leaks.

As part of the update to the Phase I Assessment, two other AST's were observed on parking Level A of the subject property. The first is a 25-gallon diesel AST with secondary containment located adjacent to an emergency generator. It was observed in good condition with no indication of staining on the floor. The second AST is a 200-gallon diesel tank that feeds the 25-gallon AST from an adjacent room. The 200-gallon AST also has secondary containment and no obvious staining was observed. The fillport used to fill the 200-gallon AST is located on the Street level.

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guide (1998), the proposed project would result in a significant impact to hazards or hazardous materials if:

- The proposal involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals or radiation); or
- The proposal involved a possible interference with an emergency response plan or emergency evacuation plan.

Project Impacts

Hazardous Materials

The existing presence of hazardous materials on the Project site does not create a significant hazard to the public or the environment. Implementation of the proposed Project would not impact hazardous materials currently used on-site. Furthermore, the proposed Project would not involve the use of significant quantities of hazardous materials that could result in a reasonably foreseeable upset or accident. Therefore, the proposed Project would not have the potential to create a significant hazard to the public or environment as a result of operational activities of the Project. As with the existing uses, operation of the proposed Project would continue to involve the use, disposal and transport of small quantities of hazardous materials from routine maintenance of various types of equipment and facilities currently on-site. The existing facilities handle these materials in an acceptable manner that does not create a hazard to the public or the environment through the use of legal disposal procedures. The proposed Project would not result in a significant hazard to the public or environment through the routine use and handling of hazardous materials provided that proper handling procedures are followed.

The existing structures to be removed are known to have asbestos containing materials (ACMs). ACMs are being removed from the existing structures as a part of the on-going asbestos abatement program for the site, as discussed above in the existing conditions section. Demolition without first removing friable or potentially friable ACMs could result in the uncontrolled release of asbestos into the air. This would constitute a potentially significant impact to on-site employees and visitors, as well as adjacent employees and residents. However, the process of asbestos and hazardous materials removal, waste packing and disposal meets all applicable federal, state and local statutes and regulations, including the South Coast Air Quality Management District Rule 1403. Rule 1403 includes a comprehensive list of asbestos removal procedures governing the removal, containment, transportation and disposal of ACMs in a manner that prevents their release into the environment. The applicable codes and procedures are extensive and listed in **Appendix 5**.

Pursuant to strict controls, the asbestos containing material, after removal, is sealed and transported into heavy duty bags in the containment area and loaded into lockable, metal dumpsters that are then loaded onto trucks that transport the material to a permitted disposal facility. In addition to the asbestos containing waste already removed, the on-going abatement program for the site includes the on-going removal of over 8,000 tons of asbestos containing waste.

During the abatement process, air monitoring will be carried out by the Environmental Consultant on behalf of the Owner to verify that the building air, both within and outside the containment area and outside containment in the environment, remains uncontaminated. In the case of an accidental spill, at a minimum, all affected areas are decontaminated by wet cleaning and HEPA vacuuming. Where necessary, the affected area(s) is/are isolated by the construction of critical barriers. If decontamination of each contained work area is incomplete, the area is then re-cleaned and retested until the clearance criteria are met.

Therefore, local air currents would not carry ACMs over surrounding uses including Century Park East Condominiums, Park Place Condominiums, Century City Hospital, Century Plaza Hotel, the St. Regis Hotel or locations along the haul route. In addition, all demolition and on-going asbestos abatement and activity would be conducted in full compliance with all other Rule 1403 requirements related to notification, waste disposal and training. The requirements of Rule 1403 and all other applicable regulations alleviate potential health risks as a result of the ACM removal process. As a result of the on-going asbestos abatement program and the identified mitigation measure (HHM-1), removal of asbestos containing materials and related health impacts would be considered less than significant.

Methane

Methane concentrations are generally insignificant and not substantially elevated above background concentrations. However, elevated concentrations of methane have been detected in localized areas of the lowest level of the garage (Level F), and below the concrete slab floor of that level. Commencement of demolition and/or construction activities without proper mitigation could result in a potentially significant impact. However, implementation of mitigation measures HHM-3 through HHM-9 would reduce the potential impact to a less than significant level.

The proposed Project would not change any of the site's access points or the surrounding circulation system. Furthermore, the proposed Project would reduce the number of vehicular trips to and from the site. Fewer trips could better facilitate emergency response or evacuation. Accordingly, the proposed Project would not impair emergency response or evacuation.

Mitigation Measures

The following mitigation measures would reduce potential impacts to a less than significant level:

- HHM-1** Prior to issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant stating that all asbestos containing materials (ACM) present in the building has been abated in compliance with South Coast Air Quality Management District's Rule 1403 as well as all other applicable local, state, and federal rules and regulations.
- HHM-2** Hazardous materials generated, as a result of routine maintenance of equipment shall be disposed of in accordance with legal disposal procedures.
- HHM-3** All contractors and construction companies shall be advised of the potential risk associated with subsurface methane in soil gas below the Project site. Although soil gas monitoring did not indicate that hydrogen sulfide is a potential problem at the Project, this gas can be associated with methane gas and should be monitored during construction operations as a potential health threat and an odor concern.
- HHM-4** The contractors and construction companies shall develop a Health and Safety Plan that addresses combustible gas and hydrogen sulfide concerns and the procedures they intend to institute to minimize potential danger from explosion or exposure in the event elevated concentrations are encountered. The Plan shall comply with all applicable environmental health and safety laws and indicate, at minimum, the following:
- Precautions that will be taken to arrest any spark generation or ignition sources during construction procedures that penetrate the concrete floor.
 - Monitoring equipment and specifications should be included for continuous monitoring of methane concentrations and comparison to levels of concern such as Permissible Exposure Levels (PELs), Threshold Limit Values (TLVs), or concentrations Immediately Dangerous to Life and Health (IDLH) in the breathing zone. In addition, methane concentrations should be regularly monitored and compared against the Lower Explosive Level (LEL). Contingency responses should be established for each scenario.
 - Specifications should be included for use of the garage ventilation system, and any additional systems, to assure maximum air exchanges, as necessary, with the facility during construction operations.
- HHM-5** The cracks in the floor and seams that open below the concrete floor shall be sealed if deemed necessary by Department of Building and Safety to minimize gas migration into the garage.
- HHM-6** The operation of the ventilation system shall be modified, if determined necessary by the Department of Building and Safety, to avoid the development of negative pressures within the building during power outages.
- HHM-7** Floor sections on Level F around new pilings shall be sealed at the completion of construction to prevent gas migration into the garage from the sub-surface.
- HHM-8** All cross connections between the Level F sub-drain piping and other systems (i.e. the storm drain and ventilation systems) shall be identified and eliminated.
- HHM-9** The building shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. The owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.

Significant Project Impacts After Mitigation

Compliance with SCAQMD Rule 1403 requirements would reduce impacts related to the removal of ACMs from on-site buildings to the extent required by existing regulations. Required compliance and the on-going asbestos abatement program for the site would assure a less than significant ACM impact.

With implementation of the recommended mitigation measures, the proposed Project would not result in a significant adverse impact with respect to methane hazards and/or hazardous materials.

Cumulative Impacts

Asbestos may be present in buildings targeted for demolition in conjunction with the related project list. Unless ACMs are removed prior to demolition, potentially significant cumulative health hazards related to the accidental release of asbestos could occur. However, as with the proposed Project, all demolition activity associated with the related projects is assumed to be conducted in full compliance with the requirements of SCAQMD Rule 1403. Consequently, the potential for an accidental release would be minimal and cumulative impacts would be considered less than significant.

Projects included under the related project list also have the potential to contain elevated levels of methane. With the presence of methane, the related projects would generate a potentially significant cumulative risk. However, the Department of Building and Safety requires all projects in "O" zones or lots that contain or are within 1,000 feet of oil wells to prepare soil-gas surveys. This would reduce the cumulative impacts to a less than significant level.

G. HYDROLOGY

Existing Conditions

Surface Water Runoff

This section is based on the hydrology and drainage analysis for the proposed Project, which was prepared by KPFF Consulting Engineers and is attached in **Appendix 10**.

The Project site is located approximately two miles south of the foothills of the Santa Monica Mountains, and six miles inland (east) from the Pacific Ocean. The site has minor undulations in surface elevation and a grade change of approximately 45 feet between the high point at the south corner of the property and the low point near the eastern corner. Most of the water in adjacent streets flows from properties in the immediate vicinity of the Project site. There is an extensive storm drain collection system in the area (shown in **Figure H-1** and **H-2**). The drains are in Avenue of the Stars, Constellation Boulevard and Century Park East. The City of Los Angeles has not yet identified any drainage system problems in the vicinity of the Project, nor do they have any capital improvements planned for the Project area.

The property is approximately 14.02 acres, of which 11.9 acres contains an underground parking lot. Within the footprint of this underground structure, there are four buildings on an elevated plaza. All drainage from the roofs of these buildings and the deck of the plaza flows through various drains and is conveyed to the surrounding storm drains in the street. In the perimeter of the plaza area, some drainage from the landscaped areas may percolate into the adjacent ground, and the remaining drainage flows on the surface to the adjacent streets. At present, approximately 59.4 cubic feet per second (cfs) falls on the entire site during the peak of a 25-year storm. Of this amount, approximately 55.1 cfs falls directly into roof and area drains on the plaza deck. The remaining amount falls in the perimeter of the site where a majority of the run-off surface flows into the surrounding streets and then the public storm drain. The local storm system drains into the Ballona Creek flood control channel and eventually into the Pacific Ocean.

Water Quality

The Project site produces a number of typical urban pollutants, especially automobile generated pollutants. Oil, grease, rubber, metals and hydrocarbons are washed from the existing hardscape surfaces and driveways into storm drains. Unpaved areas at the site generate dirt which increases the turbidity of runoff. Turbidity is the relative clarity of water, which may be affected by material in suspension in the water. Finally litter collects in gutters and is washed into drain inlets. An existing NPDES permit was issued to the subject property for the discharge of water from the subterranean drainage system into the municipal storm drain system. Pursuant to the NPDES permit, discharge water is sampled and tested on a regular basis.

Threshold of Significance

Based upon criteria established in the Draft City of Los Angeles Draft CEQA Thresholds Guide (1998), the proposed Project would result in a significant impact to hydrology if the Project:

- Caused flooding during the projected 50-year developed storm event which would have the potential to harm people or damage property or sensitive biological resources;
- Substantially reduced or increased the amount of surface water in a body of water;
- Resulted in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow; or

Insert Fig H-1 Existing Hydrologic Conditions

Insert Fig H-2 Proposed Hydrologic Conditions

- Discharged water that would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) or that would cause regulatory standards to be violated, as defined in the applicable National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving water body.

Project Impacts

Surface Water Runoff

Under the proposed Project, there would be little, if any, change as a result of the new construction. The drains on the roofs and the plaza would be reconfigured, but the end result would be almost the same amount of water flowing into each of the currently used connections to the public storm drain system. The proposed Project would not increase the volume of flow in excess of current site conditions, nor would it result in a permanent change in the direction of flow from the site. Redevelopment of the subject property would not increase the amount of impervious surface on-site. The existing storm drain infrastructure was designed to provide for the peak flow rate from the existing condition of the Project site. Development of the proposed Project would not contribute additional runoff. Therefore, the existing storm drain system would have sufficient capacity to serve the proposed Project. Mandatory compliance with City, County and State regulatory requirements would further ensure that any potential runoff effects that could occur from development would be rigorously controlled. The Project would not be subject to a known flood hazard, nor would it create a new flood hazard through impedance of surface water runoff.

Water Quality

The Project would be designed to comply with all applicable construction and operational water quality standards and waste discharge requirements. The proposed Project would be required to file a stormwater plan with the City of Los Angeles for grading activities during the construction phase. It is anticipated that the existing NPDES permit and/or its requirements would remain in effect throughout the Project with the possibility of a temporary permit for the construction phase. Environmental impacts to water quality could result from the release of toxins into the stormwater drainage channels during the routine operation of commercial uses, including restaurants. However, the potential impacts would be mitigated to a less than significant level by incorporating stormwater pollution control measures. With conformance to a stormwater plan, an NPDES permit, and mitigation measures H-1 through H-14, the proposed Project would result in a less than significant impact with regard to water quality.

Mitigation Measures

The following mitigation measures would reduce potential water quality impacts to a less than significant level:

- H-1** The Project shall comply with the requirements of the NPDES permit for stormwater discharge and with guidelines and policies of the Regional Water Quality Control Board, EPA and local agencies regarding water quality.
- H-2** The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
- H-3** Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

- H-4** Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- H-5** Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.
- H-6** Reduce and recycle waste, including oil and grease, to the extent feasible.
- H-7** Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.
- H-8** All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
- H-9** The legibility of signs and stencils discouraging illegal dumping must be maintained.
- H-10** Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.
- H-11** Storage areas must be paved and sufficiently impervious to contain leaks and spills.
- H-12** Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.
- H-13** The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.
- H-14** Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the Department of City Planning's public counter or from the City's website at www.lastormwater.org.

Significant Project Impacts After Mitigation

No significant adverse impacts are anticipated to occur through implementation of the proposed Project with mitigation. Existing storm drain facilities are adequate to serve the proposed Project and no impacts on water quality are expected after mitigation.

Cumulative Impacts

No significant cumulative impacts on the stormwater drainage system, hydrology or water quality are anticipated from implementation of this and other projects included under the related project list. The related projects would result in increased runoff to the County storm drain system as a whole. However, there are no known capacity problems in the storm drain system that flows from the project vicinity to its eventual destination in Ballona Creek. In addition, individual projects are required to develop and implement storm drain mitigation, including compliance with NPDES permit guidelines, where appropriate. With anticipated mitigation, no cumulative storm drain, hydrology or water quality impacts are anticipated.

H. LAND USE

Existing Conditions

The proposed Project is located in the City of Los Angeles, within the West Los Angeles Community Plan and Century City North Specific Plan (CCNSP) areas. Development of the subject property is governed by policies and regulations set forth in the West Los Angeles Community Plan, the CCNSP and applicable zoning. The provisions set forth in these plans have been adopted with the intention of eliminating or reducing potential land use impacts as a result of development within their jurisdictional boundaries.

There are currently ten establishments on the Project site in which alcohol is available for consumption, including two nightclubs. Alcohol service will continue to be available within the Project for the same or fewer number of establishments, however, the Project will not include a nightclub. The Los Angeles Department of City Planning and Office of Zoning Administration will conduct a review of the operations of the new alcohol-serving establishments to ensure that their operation will not have a detrimental effect upon the surrounding area.

Existing Land Use

On-Site Land Use

The proposed Project site is comprised of a 14.02-acre property currently developed with two eight-story buildings and two 44-story buildings (Century Plaza Towers) with an outdoor plaza between the four buildings. The two eight-story buildings (which contain a variety of commercial land uses including office, theater, restaurant, retail, and health club) and the outdoor plaza are located on a 9.2-acre portion of the property are to be redeveloped pursuant to the proposed Project. A six-level parking garage underlies the entire site, housing a total of 5,471 parking spaces.

In anticipation of the 2000 Avenue of the Stars project, some tenants occupying the existing facilities at the Project site (the ABC Entertainment Center) have started to vacate the leased spaces. In addition, the Shubert Theater left the site as of January 2002. Prior to the decision to redevelop the ABC Entertainment Center, the site operated at full occupancy. It should be noted that if this Project were to not occur, the existing buildings could be re-leased and fully occupied in the future.

Adjacent and Surrounding Land Uses

The site is surrounded by commercial (office, hotel, retail, restaurant, hospital, utility) and multi-family residential uses as shown in **Figure LU-1**. North of the site, along the north side of Constellation Boulevard, are the Century Club restaurant and night club and the Watt Towers, a high-rise commercial office complex. To the west, across Avenue of the Stars, is the Century Plaza Hotel, a 19-story upscale hotel property. To the east of the Project Site are the 44-story Century Plaza Towers commercial office buildings. To the south, along the south side of Olympic Boulevard, is the Park Place Condominium complex.

Other land uses within the larger surrounding area include the commercial uses to the north and northwest, multi-family residential uses to the south and southeast, and Fox Studios to the southwest.

Land Use Plans, Policy, and Zoning

The City of Los Angeles General Plan guides land use planning within the City. Land use planning designations and policies specific to the Project site are contained within the West Los Angeles Community Plan and the Century City North Specific Plan (CCNSP), which are components of the General Plan. The Southern California Association of Governments Regional Comprehensive Plan and Guide provides regional planning and policy.

Figure LU-1 Surrounding Land Uses

West Los Angeles Community Plan

The subject property is located inside the eastern boundary of the West Los Angeles Community Plan (January 10, 1992) (**Figure LU-2**). The intent of this plan is to serve as an official guide for future development within the District that will encourage economic, social and physical health, welfare and convenience within the District, consistent with the General Plan Framework Element. These objectives are carried out through the appropriate designation of private uses and public facilities with respect to their locations, densities and quantities required to support the population. “The Plan encourages the preservation of low-density single family residential areas, conservation of open space and concentration of commercial and residential development within the Century City Center.” The Century City Center is a 290-acre area bounded by Santa Monica Boulevard to the north, Pico Boulevard to the south, Century Park West to the west and Century Park East to the east. This area is designated for a mixture of residential and commercial uses as delineated in the Century City Specific Plan. Commercial development within the core area of the Century City Center is not to exceed a density in excess of six times the total land area. According to the West Los Angeles Community Plan, the subject property has been designated Regional Commercial. Allowable uses within the Regional Commercial designation include: commercial, office, retail and residential. The corresponding zoning to the Regional Commercial designation is C2-2-O.

Century City North Specific Plan

The CCNSP is one of two Specific Plans that cover the Century City Center (the other being the Century City South Specific Plan). The boundaries of the CCNSP are shown on **Figure LU-3**. Since its adoption in November of 1981, the CCNSP affects any building, structure or addition to any building or structure excluding any construction or renovation activity which does not add to [Cumulative Automobile Trip Generation Potential] CATGP. Also affected is a change of use which increases CATGP. The intent of CCNSP is to impose regulations that assist in assuring orderly development and redevelopment and provides adequate transportation and other public facilities. The Specific Plan links development with transportation improvements that have been delineated in Phase I of development of the CCNSP. Projects in Phase II of the CCNSP require written findings including consideration of mitigation of transportation impacts. The Specific Plan also provides regulations for shade impacts on residential units and other aesthetics issues pertaining to the design (see Section V.A Aesthetics for an analysis of aesthetics and shading).

The Specific Plan sets forth development requirements for Century City, including allowable uses, floor area ratios, building heights, yard and setback requirements, parking requirements, pedestrian corridors and crossings, and signage.

The commercial area of the CCNSP is divided into “core” and “buffer” areas as shown in **Figure LU-4**. The proposed Project is located within the core area, which allows for a floor area ratio (FAR) of up to 6 to 1, whereas buildings in the buffer areas are allowed an FAR of up to 4.5 to 1. Development is allowed within these commercially zoned areas when a proposed project does not contribute to a number of Trips²⁸ in excess of that generated by the existing use, or the Trips allocated to designated undeveloped or underdeveloped lots (“Crosshatched Areas”, see **Figure LU-4**). Development may also occur if Trips are transferred to the subject property in accordance with the CCNSP, or generated through a change in the existing use or demolition of existing buildings.

²⁸ Trips are defined uniquely by the CCNSP as “unit of real property development rights pursuant to this Specific Plan and means a calculation of daily arrivals at and daily departures from a building or structure by motor vehicles of four or more wheels. The number of Trips generated by any Project or existing building or structure shall be calculated utilizing the table set forth in the definition of Cumulative Automobile Trip Generation Potential.” (CCNSP section 2, pg 5)

Figure LU2 WLACPA

Figure LU-3 CCNSP

Figure LU-4 C2A

Development rights for a property within the CCNSP are determined by the number of CATGP or other Trips assigned to or transferred to a parcel. CATGP Trips are the cumulative total daily Trips generated by all Projects on commercially zoned lots within the Specific Plan Area for which building permits are issued subsequent to November 15, 1981. Based on the total number of Trips generated within the CCNSP, development has been broken down into two phases. The initial phase (Phase I) allows for development permits of up to 15,226.606 CATGP Trips. The second phase (Phase II) allows for development not to exceed 30,156.789 trips including projects developed under Phase I. Projects developed under Phase I require an administrative approval. Phase II projects require approval of a Project Permit from the City Planning Commission. Upon receiving approval of a Project Permit, Phase II development can only commence when all public improvements set forth in Section 3B1(b) of the CCNSP have been completed, unless completion is beyond the control of the developer and the City of Los Angeles. New development is also permitted if Trips are created through the demolition of existing buildings creating Replacement Trips. The subject Project uses Replacement Trips created by the demolition of the existing buildings. The regulations contained in the Specific Plan are in addition to the City's zoning regulations. However, the Specific Plan supercedes the Zoning Code in cases where it is more restrictive.

Southern California Association of Governments Regional Comprehensive Plan and Guide

The Southern California Association of Governments (SCAG) reviews Environmental Impact Reports of regionally significant projects to determine consistency with regional plans. As part of this review, SCAG assesses the consistency of such projects with policies contained in the Growth Management Chapter of the Regional Comprehensive Plan and Guide (SCAG, March 1996). These policies are related to the following goals:

- To improve the regional standard of living;
- To maintain the regional quality of life; and
- To provide social, political, and cultural equity.

Applicable policies related to these goals, as identified in SCAG's response letter to the Notice of Preparation for this EIR (January 28, 2002) are discussed below under Project Impacts.

Zoning

The proposed Project site is zoned C2-2-0. Per the Los Angeles Municipal Code (LAMC) Section 12.14, a C2 zoning designation allows for a variety of office, retail and residential uses, including uses allowed in C1.5 and C1 Limited Commercial zones (LAMC Section 12.13.5A(2) and Section 12.13A), which include retail and commercial uses. Residential uses allowed under the R4 zones are also permitted. The subject property is designated Height District No. 2. Height District No. 2 limits development to a maximum 6:1 Floor Area Ratio (FAR). The property is also designated as being in an "O" Oil Drilling District.

The land uses surrounding the Project site to the west, north, and east are similarly zoned C2-2-O, allowing for the same range of uses as the Project site. The area to the south of the Project site, across Olympic Boulevard, is zoned R4-2-O, a multi-family residential zone with certain development limitations.

Threshold of Significance

Based on criteria established in the City of Los Angeles Draft CEQA Thresholds Guidelines (1998), the proposed Project would result in a significant land use impact if:

- The proposed development is incompatible with surrounding land uses or land use patterns;

- It is not consistent with the goals and policies of the West Los Angeles Community Plan or the purposes of the CCNSP, or the policies contained in applicable regional plans (the Southern California Association of Governments' Regional Comprehensive Plan and Guide or Regional Transportation Plan).

Project Impacts

The proposed Project, 2000 Avenue of the Stars, is a redevelopment of the subject property for a mixed-use commercial office project. The 15-story development would provide 719,924 square feet of office space, 30,527 square feet of restaurant space, 18,318 square feet of retail space, and 10,178 square feet of cultural uses. Existing uses above the subterranean parking garage would be removed.

Land Use Compatibility

Land use compatibility issues for the proposed Project are related to the site's location within Century City and proximity to residential communities to the south. These considerations are examined in the following analysis with respect to the issues of consistency with land use patterns in the area and compatibility with adjacent uses.

Consistency with Land Use Patterns

As shown in **Figure LU-4**, the proposed Project site is situated on the eastern portion of the central core area of Century City. All properties within the core area are consistent with the area's C2-2-O zoning. The proposed mixed-use commercial office Project is consistent with the area's existing land use. The proposed Project would not result in a substantial change in use of the subject property. The existing use of the property is also consistent with land use patterns, but the site is underutilized. Revitalization of the currently underutilized site could help further integrate the property and its uses with the surrounding uses of Century City.

Compatibility with Adjacent Uses

This analysis examines whether the Project would create a significant land use incompatibility impact on the functional capability of adjacent land uses. Such an impact would occur if the proposed Project's physical characteristics or associated activities prevent or substantively impair existing adjacent land uses to continue their function. The analysis considers impacts such as noise and aesthetics only to the extent that they affect the ability of the adjacent land uses to continue their existing function. (A noise or aesthetic impact is not, by itself, considered a land use compatibility impact unless that impact affects the functional capacity of adjacent uses.)

As described above, the Project proposes a mixed-use commercial office development with 12 stories of office, a Street Level with the lobby, office and cultural uses, a Plaza Level with retail and restaurant uses, and a Parking Level and six levels of underground parking. Although similar uses, office and hotel, surround the Project site, in one direction the new building would be located across Olympic Boulevard from residential uses. This analysis focuses on the compatibility of these adjacencies.

The proposed commercial uses would be consistent with hotel, office, restaurant and hospital land uses located to the north, east and west of the subject property. While hotel and hospital uses are more sensitive to land use incompatibilities resulting from certain impacts (such as noise or odors) than other commercial uses, the temporary occupancy of hotels and hospitals results in a reduced sensitivity when compared to permanent occupants within a residential development. Regardless, this document does consider the impacts resulting from the Project within each of the environmental issue discussions of Section V. This analysis shows that the physical characteristics or associated activities would not prevent or substantially impair the functionality of nearby hotel and hospital uses.

Residential units may be considered incompatible if located directly adjacent to the commercial uses proposed. However, the residential uses in this instance are separated from the Project by Olympic Boulevard which is six lanes wide in the area of the subject property. Noise generated by traffic on Olympic Boulevard would drown out noise generated by uses of the subject property. In addition, the proposed Project would contain approximately 39,000 sf less retail than the existing use of the site.

The CCNSP requires that all Projects within the Specific Plan area must avoid casting a shadow for more than two hours, between the hours of 8 am and 8 pm, on any detached single-family residential structure. (See Section V.A, Aesthetics for a discussion of Project related shadow impacts.) The proposed Project would cast shadows longer than the existing buildings. However, winter and summer solstice shadows from the Project would be completely confined to the interior commercial areas of the CCNSP area, and would not cast a shadow on any single-family residential buildings. Therefore, the proposed Project would be consistent with CCNSP policies regarding shadow impacts on adjacent uses.

Consistency of the Proposed Development with Zoning, and Land Use Plans and Policy

City of Los Angeles Municipal Code

The proposed Project is a 15-story commercial structure consisting of office, restaurant, retail and cultural uses. All of the proposed uses are allowable uses and would not conflict with the C2-2-O zoning designation. The C2-2-O zoning designation is within Height District No. 2, which allows for a 6:1 FAR. The subject property covers 610,834 square feet (14.023 acres) of land area, which allows for a total of 3,665,051 square feet of floor area. Currently the site is developed to 3,067,338 square feet, with 2,388,516 square feet located in the Century Plaza Towers. The proposed Project would remove 678,822 of existing floor area and develop 778,947 square feet resulting in a net increase of 100,125 square feet. The addition of this development would yield a total of 3,167,463 square feet of floor area on the subject property, or an FAR of 5.2:1. Therefore the proposed FAR would be less than allowed by the zoning. The Project will satisfy all required parking requirements.

The total code required parking spaces for the proposed Project is 6,065 spaces and includes parking space reductions pursuant to Los Angeles Municipal Code Sections 12.21-A 4(c) and 12.24-Y. Refer to section V.M for a discussion of the parking for the site.

The Project requires the approval of a Major Development Project Conditional Use Permit by the City of Los Angeles because it involves the net addition of more than 100,000 square feet of floor area. In addition, because the Project is located within the boundaries of a Specific Plan area, it will also undergo Project Permit Compliance Review to determine whether the Project complies with the applicable regulations of the Specific Plan. This review is a separate entitlement process and approval, and is not the same as a “Project Permit” approval under the Century City North Specific Plan (CCNSP). A “Project Permit” under the CCNSP is required if a development is defined as a “project” under the Specific Plan. The CCNSP defines a “project” as any building to be constructed in a lot within the Specific Plan area, excluding any construction or renovation activity which does not add to the CATGP Trips. Because the proposed development does not generate additional CATGP Trips (see **Table V.H-1** below), it is not a “project” under the CCNSP, and therefore, does not require a “Project Permit.”

Consistency with the West Los Angeles Community Plan

The West Los Angeles Community Plan identifies goals, objectives and policies (referred to collectively as policy statements) related to different land uses within the planning area. This section assesses the proposed Project’s consistency with each of the applicable policy statements contained within the Community Plan.

Goal 2: A strong and competitive commercial sector which promotes economic vitality, and serves the needs of the community through well designed, safe and accessible areas while preserving the community's unique commercial, historic and cultural character.

Consistent. The proposed Project would redevelop underutilized property with a mixed-use commercial development that features office, restaurant, retail and cultural uses. The Project would enhance the economic vitality of the area through the re-development of an underutilized site with the proposed uses as well as sidewalk and streetscape pedestrian improvements, landscaping, street trees, indoor and outdoor dining facilities and landscaped plaza area with a lawn area. A number of design features would enhance pedestrian access from the corner of Avenue of the Stars and Constellation Boulevard to the landscaped plaza. In lieu of the existing above grade mechanical and storage areas for the building on the corner, a level, spacious plaza would encourage at-grade circulation from the corner into the site. The base of the building is set back approximately 90 feet from Avenue of the Stars, and the northern corner of the building base is set back approximately 40 feet from Constellation Boulevard. Further, the architecture on the north corner is intended to be very transparent, with floor to ceiling glass. The north corner is intended to be an open office or retail use, to further allow maximum visibility through the space into the plaza. Pedestrian access to the plaza will be further facilitated by wide stairs along Constellation Boulevard, as the street drops in elevation east of the corner. The paving from the sidewalk at the corner, around the base of the building, and into the plaza will be architectural concrete and attractive stone materials. Lighting will further indicate that the corner is the main public entrance into the site. The iconic image of the Century Plaza Towers designed by the distinguished architect Minoru Yamasaki, will be visible from the corner of Avenue of the Stars and Constellation Boulevard. Further, trees and activities in the plaza will be visible from various locations at and near the corner. Improved vehicular access to the parking facilities and curb-side valet service would increase safety in the parking areas.

All these elements would help bring patrons to the retail and restaurant uses to help revitalize this area. As discussed above, the Project is designed to complement the architectural integrity and character of surrounding areas with the Project's sophisticated contemporary design. The Project would remove the existing theater uses of the property. However, the theater uses are underutilized, and the proposed Project would include a cultural facility to be located on the Street Level. Neither of the buildings to be removed are considered historic structures.

Objective 2-1: To conserve and strengthen viable commercial development in the community and to provide opportunities for new, compatible commercial development and services within existing commercial areas.

Consistent. The proposed Project would replace the existing office (287,701 sf), theater (148,481 sf), restaurant (144,390), retail (57,316 sf) and health club (40,934 sf) uses, with a mixed-use commercial development comprised of office (719,924 sf), restaurant (30,527 sf), retail (18,318 sf) and cultural (10,178 sf). The proposed office uses respond to under-utilization of the site and a decline in use of the theater uses. Development of the Project would strengthen the commercial base of Century City by providing compatible commercial development, including service commercial uses within and adjacent to areas allowing commercial development.

Policy 2-1.1: New commercial development should be located in existing established commercial areas or shopping centers.

Consistent. The proposed Project would be located within the well-established Regional Commercial area of Century City.

Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.

Consistent. The proposed Project provides for a mix of commercial uses in an area zoned for commercial uses.

Policy 2-1.3: Ensure the viability of existing stores and businesses which support the needs of local residents and are compatible with the neighborhood.

Consistent. The proposed Project would accommodate the additional employees within Century City, which would help to ensure the viability of existing stores in the area. The proposed Project would also provide space for Project and community-serving stores, restaurants and other businesses. These uses would support the needs of local residents and employees of adjacent properties by providing a safe and comfortable shopping or dining experience in a pedestrian-friendly area. As discussed in the above section regarding land use compatibility, the proposed development is compatible with the surrounding community.

Policy 2-1.4: Require that commercial projects provide adequate parking, and improve safety and aesthetics of parking areas.

Consistent. As described in Section V.M., Transportation/Traffic, the proposed Project provides adequate parking. The amount of parking is in compliance with the Specific Plan and Municipal Code parking requirements. Improved access to the parking areas would improve the safety of the parking areas. Parking will be provided within an enclosed and subterranean structure, which ensures that such areas would not affect the aesthetics of the area.

Policy 2-2.1 Encourage pedestrian-oriented design in designated areas and in new development.

Consistent. The proposed Project would enhance the Century City commercial and pedestrian-oriented district by replacing an underutilized site with a mixed-use commercial development that features community-serving retail and restaurant uses. A number of improvements including the new plaza and lawn area, cultural facility, reconfiguration of the pedestrian corridor under Avenue of the Stars and a new landscaping plan would enhance the pedestrian environment and would contribute to increased pedestrian activity within Century City.

Policy 2-2.2: Promote mixed-use projects along transit corridors and in appropriate commercial areas.

Consistent. The proposed Project is not located along but within walking distance of the designated transit corridors of Santa Monica, Wilshire, and Sawtelle Boulevards. The Project site is within a designated commercial area.

Policy 2-2.3: Require that mixed use projects and development in pedestrian oriented districts be designated and developed to achieve a high level of quality, distinctive character, and compatibility with existing uses.

Consistent. The proposed Project would develop a “Class A” office building and facilities with a high level of quality. The proposed architecture of the building is unique, and could be considered a local monument due to its unique design. The Project’s modern architecture would be compatible with the predominantly modern architecture of the Century City area. See above discussion regarding Policy 2-1.3 for compatibility with existing uses

Policy 2-2.5: Require that the first floor street frontage of structures, including mixed use projects and parking structures located in pedestrian oriented districts, incorporate commercial uses.

Consistent. The Street Level would include the lobby to the office building, some tenant space and a cultural facility. A pedestrian promenade would direct guests from Avenue of the Stars through the site passing by gardens to the proposed retail and restaurant uses of the site.

Objective 2-3: To enhance the appearance of commercial districts.

Consistent. The proposed Project would redevelop the western portion of the subject property, replacing two existing buildings along Avenue of the Stars and renovation of the existing plaza. The buildings to be replaced exhibit a travertine skin, and stark architecture. The proposed building addresses market demand for a unique office environment. The building would have an opening in the center, and would be modern in style utilizing clear glazing and metal cladding. The hardscaped plaza would be renovated and landscaped including a lawn area for use by employees and visitors.

Policy 2-3.1: Establish street identity and character through appropriate sign control, landscaping and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.

Consistent. The Project does not propose any new billboards, nor would it effect existing billboards along surrounding streets including Santa Monica Boulevard. Landscape and streetscape improvements made to the subject property would be consistent with the design criteria of the West Los Angeles Community Plan, CCNSP, and would be compatible with the surrounding uses of Century City.

Policy 2-3.2: Require that commercial projects be designed and developed to achieve a high level of quality, distinctive character and compatibility with surrounding uses and development.

Consistent. See discussion regarding Objective 2-3 and Policy 2-1.3.

Consistency with the Century City North Specific Plan

This discussion identifies relevant sections of the CCNSP and assesses the proposed Project's conformance with the requirements set forth in each section. The proposed Project is consistent with the goals and policies of the CCNSP.

3A. The purpose of this Section [3] is to assure orderly development and to provide street capacity and other public facilities adequate for the intensity and design of development by establishing phases for construction within the Specific Plan Area. The first phase of development shall continue until building permits and certificates of occupancy have been issued for Projects, which generate all of the CATGP allocated to such first phase. The second phase of development shall begin when building permits have been issued for Projects generating 15,225.606 Trips, exclusive of Trips assigned by this Ordinance to Parcel A of Parcel Map Los Angeles No. 3784 and Parcel B of Parcel Map Los Angeles No. 1483; and when all public improvements set forth in Section 3B1(b) of this Ordinance are completed, unless such completion is delayed by conditions beyond the control of the developer and the City of Los Angeles as determined by the City Planning Commission. In the event a Project is proposed whereby the CATGP, including Trips generated by such Project, exceeds said 15,225.606 Trips, the developer of such Project shall comply with Sections 3B1 and 10 of this Ordinance, such Project shall require a Project Permit, and such Project may utilize the Trips allocated to such Project for both phases of development. Nothing contained in this Ordinance shall prevent the issuance of a building permit for a Project in the residentially zoned areas of the Specific Plan Area, so long as such Project complies with the provisions of Sections 3B2(g), 3B2(h), and 3B2(i) of this Ordinance and conforms to the zoning of and any other regulations applicable to the lot on which it is located.

All undeveloped and underdeveloped parcels ("Crosshatched Areas") within the CCNSP were allotted a certain number of Cumulative Automobile Trip Generation Potential (CATGP) trips in one or both of the two specific plan phases. Development under the CCNSP is governed and capped by the CATGP trips allocated to each parcel, along with other CCNSP requirements. Development is allowed within these commercially zoned areas when it does not contribute to a number of trips in excess of the existing use, or the amount allocated to the subject property if it is undeveloped or underdeveloped. Development may also occur if trips are transferred to the subject property in

accordance with the CCNSP, or generated through a change in the existing use or demolition of existing buildings. For the Project site, no additional CATGP trips have been allocated beyond those associated with the existing uses.

Existing uses at the Project site generate 19,161 daily trips according to trip generation factors for development within the CCNSP (Table V.H-1). The proposed Project would generate 12,450 daily trips, or 6,711 fewer trips, compared to the existing uses. The remaining trips would be considered Replacement Trips, for they are responsible for a portion of the baseline condition. Therefore, the proposed Project would be consistent with the Section 3A of the CCNSP.

Table V.H-1
Trip Generation
Per Century City North Specific Plan (CCNSP)

Land Uses	FAR Area	Per CCNSP Daily Trip	
		Rate/1,000 sf FAR	Daily Trips
Proposed Uses			
Office	719,924 sf	14	10,079
High-Turnover Restaurant	15,264 sf	45	687
Quality Restaurant	15,263 sf	45	687
Retail	18,318 sf	35	641
Cultural Use	10,178 sf	35	356
(A) Totals	778,947 sf		12,450
Existing Uses			
Office	287,701 sf	14	4,028
Theater	148,841 sf	35	5,197
Restaurant	144,390 sf	45	6,497
Retail	57,316 sf	35	2,006
Health Club	40,934 sf	35	1,433
Existing Total	678,822 sf		19,161
Net Total	100,125 sf		-6,711

Source: Crain and Associates, 2002.

3C. Second Phase of Development: During the second phase of development, a Project in the commercially zoned areas shall be permitted only if the CATGP, including the Trips generated by such Project, does not exceed 30,516.789 Trips, and if the following requirements are met:

1. A Project Permit, including such conditions as are deemed necessary by the City Planning Commission, has been granted for such Project pursuant to the procedures set forth in Section 4 of this Ordinance. The City Planning Commission shall make the following written findings prior to approving any such Permit:
 - a. Such Project conforms to all of the provisions of this Specific Plan, the West Los Angeles Community Plan and all other applicable provisions of the General Plan.

As discussed under Section 3A, the proposed Project would not be considered a "Project" under the CCNSP and a Project Permit is not required. Regardless, the proposed Project would be consistent with the provisions of the plans identified above.

- b. Such Project has been designed in a way to reasonably assure that it will not cast a shadow for more than two hours, between 8 a.m. and 8 p.m., upon any detached single-family dwelling located outside the Specific Plan Area.*

The proposed Project would conform to this requirement, as the Project does not cast shadows on any detached single-family dwellings. See Section V.A, Aesthetics, for a discussion of shade and shadow impacts as a result of the proposed project.

- c. Sufficient provisions have been made, if necessary, to assure the installation of a continuous Pedestrian Corridor in accordance with the provisions of Section 10 of this Ordinance and as shown on the Map.*

In compliance with the Century City North Specific Plan, a grade-separated pedestrian crossing is provided below Avenue of the Stars to allow pedestrians to easily walk between the Century Plaza Hotel and the retail, restaurants and amenities in the landscaped plaza in the 2000 Avenue of the Stars project. Currently, a grade-separated pedestrian crossing is provided below Avenue of the Stars connecting the Project site to the Century Plaza Hotel. The existing corridor is 50 feet wide and nine feet in height.

The proposed pedestrian corridor would connect the existing courtyard at the Century Plaza Hotel to the new plaza elevation by way of a well-lit and ventilated pedestrian corridor under Avenue of the Stars that would be approximately 16 feet wide, and between 10 and 15 feet in height. A canopy of signage would mark the enlarged entry on the Hotel side, and a series of murals would decorate the pedestrian corridor itself (see Figure PD-13). The pedestrian corridor would have a tiled floor, plaster walls and a plaster ceiling with cove lighting. The pedestrian corridor slopes down from the Hotel courtyard about 5 feet over 150 feet to an escalator that connects up one level to the Plaza level lobby. A pedestrian promenade would direct guests from Avenue of the Stars through the site, passing by sitting areas, gardens, flowering canopy trees, courtyards, and grassy slopes. The proposed Project would also maintain at grade pedestrian access from Constellation Boulevard and Century Park East. The proposed Project would be located so as not to impede the location of construction of the Pedestrian Corridor required in connection with other developments. Pedestrian access to and through the site would, however be improved by opening up the northwest corner of the site to street level.

- d. Sufficient provisions have been made, if necessary, to assure the installation of Pedestrian Crossings in accordance with the provisions of Section 10 of this Ordinance and as shown on the Map.*

See discussion above regarding Section 3C.1.c.

- e. The Project has been designed in a manner, which adequately screens ventilation, heating and air conditioning ducts, tubes, equipment and other related appurtenances from the view of pedestrians, motorists and occupants of adjacent buildings.*

The proposed Project has been designed such that these appurtenances are not visible at ground level by pedestrians or motorists, or from above by occupants of adjacent buildings.

- f. Consideration has been given by the City Planning Commission to impacts generated by the Project on the vehicular circulation system within the Specific Plan Area and on the sections of Pico, Olympic and Santa Monica Boulevards between one mile easterly and one mile westerly of the boundaries of the Specific Plan Area, including specifically the impacts at those intersections serving the Specific Plan Area at Pico, Olympic and Santa Monica Boulevards, and that mitigation measures, if any, were given due consideration. Such consideration of impacts and mitigation measures shall include, but not be limited to, forecasts of potential traffic from: (1) all Projects within the Specific Plan Area and the area governed by the Century City South Specific Plan for which building permits have been issued, but which have not yet been constructed and (2) all allowable future development permitted under the densities and uses set forth for said areas. These forecasts shall be based on the Trip generation factors contained in the definition of CATGP. Said consideration of impacts and mitigation measures shall be made in writing or reduced to writing and shall be a part of the Project Permit file.*

See discussion above regarding Section 3A.

- h. Adequate sewers and similar public utilities, facilities and services, other than those considered pursuant to Section 3C1(g) of this Ordinance, exist or will exist to service the intensity and design of the proposed Project and other development in the Specific Plan Area.*

See Section V.N, Utilities and Services, for a discussion of utilities and service system impacts as a result of the proposed Project. The proposed Project would not generate additional impacts on utilities and services above and beyond the existing conditions.

- i. Sufficient provisions have been made to assure the installation of any on-site or off-site improvements deemed necessary by the City Engineer to accommodate any cumulative impacts generated by the Project on existing sewers or other similar public utilities, facilities and services, other than those considered pursuant to Section 3C1(g) of this Ordinance.*

See discussion regarding Section 3.C1.h.

- 2. During the second phase of development, Projects in commercially zoned areas shall conform to the applicable provisions below:*
- c. A Project may be constructed on a lot within the non-crosshatched areas shown on Appendix A only to the extent that Trips transferred to the Project Site in accordance with Sections 3C5 and 5 of this Ordinance, and Trips resulting from changes of use or demolition of existing buildings, have not already been utilized on such Project Site.*

See discussion regarding Purpose 3A.

- d. A Project within the Buffer Area may have a Floor Area Ratio of not more than four and one-half to one. A Project within the Core Area may have a Floor Area Ratio of not more than six to one.*

The proposed Project is located within the Core Area of the CCNSP. The proposed Project would result in an FAR of 5.2:1, which would meet this requirement.

Consistency with Regional Plans

As described in Table V.H-2, the proposed Project would be consistent with applicable regional policies, as identified by SCAG.

Table V.H-2
Consistency With Applicable SCAG Regional Policies²⁹

Policy	Project Consistency
Growth Management Chapter	
<p><i>3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies, shall be used by SCAG in all phases of implementation and review.</i></p>	<p>Consistent. Section V.J., Population, Housing, and Employment, discusses the proposed Project's generation of population, housing, and employment at the Project site and compares these to regional forecasts provided by SCAG. As described in Section V.J., the proposed Project would not generate population or housing units and its employment levels would be within SCAG forecasts.</p>
Growth Management Chapter	
<p><i>3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.</i></p>	<p>Consistent. Sections V.K., V.L., V.M., and V.N. of this EIR evaluate the relationship of the proposed Project's demand to existing and planned public facilities, utility systems, and transportation systems. As described in these sections, the proposed Project would not result in significant impacts after mitigation with respect to these services.</p>
Growth Management Chapter Policies Related to Improve the Regional Standard of Living	
<p><i>3.05 Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.</i></p>	<p>Consistent. The proposed Project would redevelop an underutilized site within an existing urban area that is served by existing infrastructure. The Project would make use of the existing infrastructure without creating a need for substantial additional infrastructure. Century City is a central commercial area, which is well located and planned near residential neighborhoods, allowing for reduced commuting distances for many employees.</p>
<p><i>3.09 Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.</i></p>	<p>Consistent. The anticipated infill development involves lower infrastructure and public service delivery cost as compared to development in areas that are not currently served by existing infrastructure.</p>

²⁹ The policies listed in this table are those identified by SCAG in its January 28, 2002 NOP response letter.

**Table V.H-2 (Cont.)
Consistency With Applicable SCAG Regional Policies³⁰**

Policy	Project Consistency
<p>3.10 Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.</p>	<p>Consistent. The proposed Project is intended to enhance the economic vitality and competitiveness of the uses at the Project site and in Century City.</p>
<p>Growth Management Chapter Policies Related to Improve the Regional Quality of Life</p>	
<p>3.12 Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.</p>	<p>Consistent. The site is very accessible from area roadways and mass transit. The proposed Project is not anticipated to generate a significant alteration of the existing distribution of population or employment base. Residential housing units are located adjacent and proximate to the Project site. This proximity, as well as the provision of restaurants in conjunction with existing and proposed office uses in Century City would shorten and/or avoid vehicle trips during lunch hours, and often delay evening return trips as commuters stay for dinner, shopping or entertainment near work. The Project site is also adjacent to bus transit along Avenue of the Stars and Constellation Boulevard, and will include bicycle parking spaces, both of which reduce automobile trips and facilitate use of alternative modes of travel.</p>
<p>3.13 Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.</p>	<p>Consistent. The proposed Project would replace/redevelop two commercial structures and associated facilities. Implementation of the Project would increase the use of a currently underutilized site within the heart of the Century City North Specific Plan.</p>
<p>3.16 Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.</p>	<p>Consistent. The proposed Project would redevelop and revitalize a currently underutilized site located within Century City, and identified Regional Center in the City of Los Angeles General Plan. It is also one block south of the Santa Monica Boulevard transportation corridor.</p>

³⁰ The policies listed in this table are those identified by SCAG in its January 28, 2002 NOP response letter.

**Table V.H-2 (Cont.)
Consistency With Applicable SCAG Regional Policies³¹**

Policy	Project Consistency
Growth Management Chapter Policies Related to Improve the Regional Quality of Life	
3.18 <i>Encourage planned development in locations least likely to cause adverse environmental impact.</i>	Consistent. The proposed Project would be developed on an underutilized site that is surrounded by urban development of similar use, scale and character to that proposed. This reduces the possibility that the Project would create adverse environmental impacts. Proposed Project development is consistent with plans and zoning for the site.
3.20 <i>Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.</i>	Consistent. The proposed Project would be built in an urban environment, which does not include any of these resources. Therefore the proposed Project would not adversely affect these resources. In addition, the reuse of existing urban development could reduce pressures for development in non-urban areas that more likely result in the potential for effects on these resources.
3.21 <i>Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</i>	Consistent. The Project would remove two existing structures and redevelop the site with a mix of land uses. A six-level subterranean parking garage is currently located underneath the subject property. No grading below the fill materials located under the parking garage would occur as a result of the Project.
3.22 <i>Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.</i>	Consistent. The proposed Project site is not subject to hazards associated with high fire, flood, or steep slopes. As described in Section V.E, impacts associated with seismic shaking are considered potentially significant. However, Project compliance with applicable Uniform Building Code requirements would reduce impacts to a less than significant level.

³¹ The policies listed in this table are those identified by SCAG in its January 28, 2002 NOP response letter.

**Table V.H-2 (Cont.)
Consistency With Applicable SCAG Regional Policies³²**

Policy	Project Consistency
<p>3.23 Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage and to develop emergency response and recovery plans.</p>	<p>Consistent. The proposed Project site does not contain significant biological or ecological resources and therefore the proposed Project would not affect such resources. As described in Section V.I., the proposed Project is not expected to result in significant impacts related to operational noise. However, although this EIR includes construction noise reducing mitigation measures, the Project would result in a potentially significant construction noise impact. This is temporary in nature. This EIR includes mitigation measures to reduce potential seismic impacts (see Section V.E).</p>
<p>Growth Management Chapter Policies to Provide Social, Political, and Cultural Equity</p>	
<p>3.27 Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.</p>	<p>Consistent. Sections V.K., V.L., and V.N. of this EIR evaluate the relationship of the proposed Project's demand to existing and planned public facilities and utility systems. As described in these sections, the proposed Project would not result in significant impacts after mitigation with respect to these services.</p>
<p>Core Regional Transportation Plan Policies</p>	
<p>4.01 Transportation investments shall be based on SCAG's adopted Regional Performance indicators regarding mobility, accessibility, environment, reliability, safety, equity/environmental justice, and cost effectiveness</p>	<p>Consistent. As described in Section V.M., the proposed Project would not result in significant traffic impacts after mitigation and therefore would not require transportation investments as mitigation. The proposed Project would not otherwise involve transportation investments.</p>
<p>4.02 Transportation investments shall mitigate environmental impacts to an acceptable level.</p>	<p>Consistent. As described in Section V.M., the proposed Project would not result in significant traffic impacts after mitigation and therefore would not require transportation investments as mitigation.</p>

³² The policies listed in this table are those identified by SCAG in its January 28, 2002 NOP response letter.

**Table V.H-2 (Cont.)
Consistency With Applicable SCAG Regional Policies³³**

Policy	Project Consistency
<i>4.04 Transportation Control Measures shall be a priority.</i>	Consistent. As described in Section V.M., the proposed Project would not result in significant traffic impacts after mitigation.
<i>4.16 Maintaining and operating the existing transportation system will be a priority over expanding capacity.</i>	Consistent. As described in Section V.M., the proposed Project would not result in significant traffic impacts after mitigation. No increase in capacity is proposed.
Air Quality Chapter Core Actions	
<i>5.07 Determine specific programs and associated actions needed (e.g., indirect source rules, enhanced use of telecommunications, provision of community based shuttle services, provision of demand management based programs, or vehicle-miles-traveled/emission fees) so that options to command and control regulations can be assessed.</i>	Not Applicable. This policy is implemented by SCAG with regard to their regulatory programs. As described in Section V.B., the proposed Project would not result in significant air quality impacts.
<i>5.11 Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional and local) consider air quality, land use, transportation and economic relationships to ensure consistency and minimize conflicts.</i>	Consistent. Air quality, land use, and transportation issues are discussed in Sections V.B., V.H., and V.M., respectively. The proposed Project would not result in conflicts or significant impacts after mitigation with respect to these issues. The project could, however contribute to a potentially significant air quality impact for construction.
Water Quality Chapter Recommendations and Policy Options	
<i>11.07 Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.</i>	Consistent. As described in Section V.N.3, the water supplier for this project, LADWP, is working to increase the portion of its supply that is provided by recycled water. In addition, the proposed project would result in a net reduction in the demand for water.

Mitigation Measures

The proposed Project would not result in significant land use compatibility or land use plan consistency impacts, and, therefore, mitigation measures are not required.

³³ The policies listed in this table are those identified by SCAG in its January 28, 2002 NOP response letter.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant land use compatibility or land use plan consistency impacts. Therefore, it would not result in significant unavoidable impacts.

Cumulative Impacts

Included in the development attributable to past, present and probable future projects would be some development related to the unutilized Replacement Trips associated with the existing buildings that would be available for use in the Century City North Specific Plan (CCNSP) area. It would be speculative to try to determine what projects might be engendered from these trips. The Replacement Trips (Trips) may be utilized at one or more sites in the plan area through the transfer procedures set forth in the CCNSP. All of these Trips are within the anticipated development projections of the CCNSP. As such, they were planned for, and development associated with these Trips is a part of the local land use projections of the City of Los Angeles and part of the existing baseline. These projections are utilized regionally by SCAG and SCAQMD, and thus would not represent new unanticipated growth. The Replacement Trips (and impacts of the associated development) are currently in use as a part of the existing development on the site; in other words, they represent part of the existing baseline conditions. It should be noted, however, that the potential use of these trips is very limited. They must be used within the CCNSP area, and cannot be used in other jurisdictions or in other parts of Los Angeles. Further, any development utilizing these trips would, like the Project, be subject to the City of Los Angeles environmental review procedures, and appropriately analyzed and addressed under CEQA. No cumulatively considerable impact is anticipated as a result of the Project when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects, including development that may occur as a result of the Replacement Trips.

Section IV, Environmental Setting, provides a list of projects that are planned or are under construction in the project area. West of the site, along the south side of Constellation Boulevard, the Constellation Place Project (related project #1) is currently under construction. Anticipated uses include office space and retail/commercial uses. Since the proposed Project and other developments planned for the area (such as the Constellation Place Project and the Westfield Shoppingtown Century City expansion) are consistent with the overall existing and planned land use patterns in the area, cumulative impacts in this regard are not expected. As discussed above, the proposed Project is compatible with existing uses immediately surrounding the site. Moreover, the Project would remain compatible with other known proposed development in the area, such as the Constellation Place project and the Westfield Shoppingtown Century City Expansion. Therefore, cumulative land use impacts are less than significant.

I. NOISE

This section is based upon the Noise Assessment For: 2000 Avenue of the Stars prepared by Mestre Greve Associates, dated June 25, 2002 (**Appendix 11**). Project traffic data utilized to assess the Project's traffic noise impacts was obtained from the Project traffic study, prepared by Crain and Associates.

Existing Conditions

Noise Criteria Background

Sound is technically described in terms of the loudness (amplitude) of the sound and frequency (pitch) of the sound. The standard unit of measurement of the loudness of sound is the decibel (dB). Decibels are based on the logarithmic scale. The logarithmic scale compresses the wide range in sound pressure levels to a more usable range of numbers in a manner similar to the Richter scale used to measure earthquakes. In terms of human response to noise, a sound 10 dB higher than another is judged to be twice as loud; and 20 dB higher four times as loud; and so forth. Everyday sounds normally range from 30 dB (very quiet) to 100 dB (very loud).

Since the human ear is not equally sensitive to sound at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted decibel scale (dBA) performs this compensation by discriminating against frequencies in a manner approximating the sensitivity of the human ear. Community noise levels are measured in terms of the "A-weighted decibel," abbreviated dBA.

Sound levels decrease as a function of distance from the source as a result of wave divergence, atmospheric absorption and ground attenuation. As the sound wave form travels away from the source, the sound energy is dispersed over a greater area, thereby dispersing the sound power of the wave. Atmospheric absorption also influences the levels that are received by the observer. The greater the distance traveled, the greater the influence and the resultant fluctuations. The degree of absorption is a function of the frequency of the sound as well as the humidity and temperature of the air. Turbulence and gradients of wind, temperature and humidity also play a significant role in determining the degree of attenuation. Intervening topography can also have a substantial effect on the effective perceived noise levels.

Noise has been defined as unwanted sound and it is known to have several adverse effects on people. From these known effects of noise, criteria have been established to help protect the public health and safety and prevent disruption of certain human activities. This criteria is based on such known impacts of noise on people as hearing loss, speech interference, sleep interference, physiological responses and annoyance. Each of these potential noise impacts on people are briefly discussed in the following narratives:

- Hearing Loss is not a concern in community noise situations of this type. The potential for noise induced hearing loss is more commonly associated with occupational noise exposures in heavy industry or very noisy work environments. Noise levels in neighborhoods, even in very noisy airport environs, is not sufficiently loud to cause hearing loss.
- Speech Interference is one of the primary concerns in environmental noise problems. Normal conversational speech is in the range of 60 to 65 dBA and any noise in this range or louder may interfere with speech. There are specific methods of describing speech interference as a function of distance between speaker and listener and voice level.
- Sleep Interference is a major noise concern for traffic noise. Sleep disturbance studies have identified interior noise levels that have the potential to cause sleep disturbance. Note that sleep disturbance does not necessarily mean awakening from sleep, but can refer to altering the pattern and stages of sleep.

- Physiological Responses are those measurable effects of noise on people that are realized as changes in pulse rate, blood pressure, etc. While such effects can be induced and observed, the extent is not known to which these physiological responses cause harm or are sign of harm.
- Annoyance is the most difficult of all noise responses to describe. Annoyance is a very individual characteristic and can vary widely from person to person. What one person considers tolerable can be quite unbearable to another of equal hearing capability.

Noise Measurement

The description, analysis and reporting of community noise levels around communities is made difficult by the complexity of human response to noise and the myriad of noise metrics that have been developed for describing noise impacts. Each of these metrics attempts to quantify noise levels with respect to community response. Most of the metrics use the A-Weighted noise level to quantify noise impacts on humans. A-Weighting is frequency weighting that accounts for human sensitivity to different frequencies.

Noise metrics can be divided into two categories: single event and cumulative. Single-event metrics describe the noise levels from an individual event such as an aircraft fly over or perhaps a heavy equipment pass-by. Cumulative metrics average the total noise over a specific time period, which is typically 1 or 24-hours for community noise levels. For this type of analysis, cumulative noise metrics will be used.

Several rating scales have been developed for measurement of community noise. These account for: (1) the parameters of noise that have been shown to contribute to the effects of noise on man, (2) the variety of noises found in the environment, (3) the variations in noise levels that occur as a person moves through the environment, and (4) the variations associated with the time of day. They are designed to account for the known health effects of noise on people described previously. Based on these effects, the observation has been made that the potential for a noise to impact people is dependent on the total acoustical energy content of the noise. A number of noise scales have been developed to account for this observation. Two of the predominate noise scales are: the Equivalent Noise Level (LEQ) and the Community Noise Equivalent Level (CNEL). These scales are described in the following paragraphs.

LEQ is the sound level corresponding to a steady-state sound level containing the same total energy as a time-varying signal over a given sample period. LEQ is the "energy" average noise level during the time period of the sample. LEQ can be measured for any time period, but is typically measured for 1 hour. This 1 hour noise level can also be referred to as the Hourly Noise Level (HNL). It is the energy sum of all the events and background noise levels that occur during that time period.

CNEL, Community Noise Equivalent Level, is the predominant rating scale now in use in California for land use compatibility assessment. The CNEL scale represents a time weighted 24-hour average noise level based on the A-weighted decibel. Time weighted refers to the fact that noise that occurs during certain sensitive time periods is adjusted upwards for occurring at these times. Noises occurring during the evening time period (7 p.m. to 10 p.m.) are counted as if they were 5 dBA louder, while nighttime (10 p.m. to 7 a.m.) noises counted as if they were 10 dBA louder. These time periods and adjustments were selected to reflect people's increased sensitivity to noise during these time periods. A CNEL noise level may be reported as a "CNEL of 60 dBA," "60 dBA CNEL," or simply "60 CNEL."

Noise Exposure Standards

City of Los Angeles Noise Element

Exhibit 1 of the City of Los Angeles Noise Element presents "Guidelines for Noise Compatible Land Use". This exhibit classifies various land uses in terms of Normally Acceptable, Conditionally

Acceptable, Normally Unacceptable and Unacceptable based on their noise exposure in the Community Noise Equivalent Level (CNEL) scale.

For single family residential uses, CNEL levels from 50 to 55 dB are Acceptable, CNEL levels from 60 to 65 are Conditionally Acceptable, CNEL levels of 70 dB are Normally Unacceptable and CNEL levels exceeding 75 dB are Clearly Unacceptable.

For multi-family residential uses, CNEL levels from 50 to 65 dB are Acceptable, CNEL levels from 60 to 70 dB are Conditionally Acceptable, CNEL levels of 70 to 75 dB are Normally Unacceptable and CNEL levels exceeding 75 dB are Clearly Unacceptable.

For commercial uses, CNEL levels from 50 to 65 dB are Acceptable, CNEL levels from 65 to 75 are Conditionally Acceptable, and CNEL levels of 75 to 80 dB are Normally Unacceptable.

Land uses exposed to noise levels that are considered Normally Acceptable indicates that the land use is compatible with the noise environment and no special noise insulation is required. If a project results in a Conditionally Acceptable noise level, a noise analysis is typically required to determine noise mitigation required to reduce noise to a compatible level. Conventional construction will normally suffice with a fresh air supply system or air conditioning to allow windows to remain closed. A noise analysis is also required for new construction exposed to a Normally Unacceptable noise level. The analysis is required to determine mitigation measures to reduce noise levels to a compatible level. In general, development is discouraged for land uses in areas with this designation. Proposed development exposed to Clearly Unacceptable noise levels should generally not be undertaken.

Noise Element policies establish a 65 CNEL standard for outdoor residential areas and a 45 CNEL standard for indoor residential areas. The noise element does not set standards for uses other than residential.

City of Los Angeles Noise Ordinance

The Los Angeles Municipal Code (LAMC) (Chapter XI-Noise Regulation) establishes the noise standards for various noise sources generated on private property affecting neighboring properties. Parking lot noise sources are not specifically regulated by the LAMC. The section of the LAMC (Article 6-General Noise) is what is referred to as a "nuisance ordinance" in that it does not contain any specific noise limits that cannot be exceeded. In general, these types of ordinances are difficult to enforce because they do not define specific noise levels that are considered nuisances. The LAMC does set specific restrictions for specific activities. Two of these sections relate to the Project.

Section 112.02 of the LAMC regulates air conditioning, refrigeration, heating, pumping and filtering equipment. This equipment cannot cause the noise level on any adjacent occupied property to exceed the ambient noise level by more than 5 dB.

Section 114.03 of the LAMC regulates loading and unloading of vehicles at loading docks. This section restricts any person to "load or unload any vehicle, or operate any dollies, carts, forklifts, or other wheeled equipment which causes any impulsive sound, raucous or unnecessary noise within 200 feet of any residential building" between the hours of 7:00 a.m. to 10:00 p.m.

Section 41.40 of the LAMC regulates construction noise. Specifically, LAMC section 41.40(a) restricts any construction activity that generates substantial noise levels to between 7:00 a.m. and 9:00 p.m. Section 41.40(b) of the LAMC further restricts all construction within 500 feet of residences to between 8:00 a.m. and 6:00 p.m. on Saturdays or national holidays and at no time on Sundays.

Existing Conditions

The existing noise environment in the vicinity of the Project site is typical of most urban areas within Southern California, characterized by a varying background or "ambient" noise levels generated by vehicular traffic on nearby freeways and major thoroughfares, commercial activities, and a variety of other characteristic urban noise elements such as emergency vehicle sirens, noise from patrons waiting in line for a theater show, car alarms, and loud stereos.

The noise environment in the Project area is primarily determined by the local traffic on local streets, including Avenue of the Stars, Century Park East, Olympic Boulevard, Constellation Boulevard, Santa Monica Boulevard, and Century Park West. This noise environment is generated simply because there is a lot of traffic brought on by the high volume of types generated by commercial and office uses. The noise activity on these streets and surrounding area is typical for this type of environment.

An estimate of highway noise levels in terms of CNEL was computed for the roadways affected by Project traffic. The Highway Noise Model published by the Federal Highway Administration ("FHWA Highway Traffic Noise Prediction Model," FHWA-RD-77-108, December, 1978) was utilized. The CALVENO noise emission curves developed by Caltrans were used with the FHWA model. These curves better model the California vehicle mix. The FHWA Model uses traffic volume, vehicle mix, vehicle speed, and roadway geometry to compute the "equivalent noise level." A computer code has been written which computes equivalent noise levels for each of the time periods used in the calculation of CNEL. Weighting these noise levels and summing them results in the CNEL for the traffic projections used. CNEL contours are found by iterating over many distances until the distances to the 60, 65, and 70 CNEL contours are found.

The distances to the existing 60, 65 and 70 CNEL contours for the roadways whose noise levels will be affected by Project traffic are given in **Table V.I-1**. These represent the distance from the centerline of the road to the contour value shown. The CNEL at 100 feet from the roadway centerline is also presented. The values given in **Table V.I-1** represent existing noise levels and do not take into account the effect of any existing noise barriers or topography that may affect ambient noise levels. Areas with noise barriers or structures that break line of sight from a receptor to the roadway will experience lower levels. Traffic volumes, speeds and mixes used in calculating these noise levels can be found in the appendix to the noise study and were provided in a traffic study³⁴. Noise levels along all roadways examined in the traffic study can also be found in the appendix to the noise study.

³⁴ Traffic Impact Study for Office, Commercial and Cultural Use Project at 2000 Avenue of the Stars, Century City, Crain and Associates, June 2002

Table V.I-1
Modeled Existing Roadway Traffic Noise Levels

Roadway Segment	CNEL @ 100'†	Distance To CNEL Contour† (feet)		
		70 CNEL	65 CNEL	60 CNEL
Constellation Boulevard				
Century Park West to Avenue of the Stars	59.3	RW	41	89
Avenue of the Stars to Century Park East	61.9	29	63	135
Olympic Boulevard				
Overland Ave. to Beverly Glen Blvd.	66.7	60	129	279
Beverly Glen Blvd. to Century Park West	66.8	61	132	285
Century Park West to Avenue of the Stars	66.5	58	126	271
Avenue of the Stars to Century Park East	66.6	60	129	277
Century Park East to Spalding Dr.	66.7	61	130	281
Galaxy Way				
Avenue of the Stars to Century Park East	53.0	RW	RW	34
Pico Boulevard				
Overland Ave. to Beverly Glen Blvd.	65.0	47	100	216
Beverly Glen Blvd. to Motor Ave.	64.8	45	96	207
Motor Ave. to Avenue of the Stars	65.8	53	113	244
Avenue of the Stars to Century Park East	64.9	46	98	212
Overland Avenue				
Olympic Blvd. to Pico Blvd.	58.8	RW	39	83
Beverly Glen Boulevard				
Olympic Blvd. to Pico Blvd.	60.3	RW	49	105
Century Park West				
Santa Monica Blvd. to Constellation Blvd.	57.8	RW	33	72
Constellation Blvd. to Olympic Blvd.	59.6	RW	43	94
Motor Avenue				
South of Pico Blvd	61.0	25	55	117
Avenue of the Stars				
Constellation Blvd. to Olympic Blvd.	63.2	35	76	163
Olympic Blvd. to Galaxy Way	62.4	31	67	145
Galaxy Way to Pico Blvd.	62.6	32	69	148
Century Park East				
Constellation Blvd. to Olympic Blvd.	62.4	31	67	144
Olympic Blvd. to Pico Blvd.	60.9	RW	53	114
Spalding Drive				
North of Olympic Blvd.	55.8	RW	RW	52

† Measured from centerline of roadway.
RW-Contour falls within road right-of-way.

Table V.I-1 shows that Olympic Boulevard and Pico Boulevard generate the highest levels of noise in the Project area with noise levels along Pico Boulevard being slightly lower than along Olympic Boulevard. Noise levels along Constellation Boulevard, Overland Avenue, Beverly Glen Boulevard, Century Park West, Motor Avenue, Avenue of the Stars Century Park East and Spalding Drive are moderate. Traffic noise levels along Galaxy Way are minor.

Threshold of Significance

Construction Phase Impact Threshold

The proposed Project would result in a significant short-term noise impact if excavating and/or construction noise levels occur at times or on days that exceed the standards set in the City of Los Angeles (LAMC) Noise Ordinance.

Operational Impacts Threshold

A significant operational noise impact would occur if the Project traffic caused a permanent ambient noise level increase greater than 3 dB on a roadway segment adjacent to a noise sensitive land use, and the resulting future Project noise level exceeded the criteria level for the noise sensitive land use. In this case, the criteria level is 70 CNEL for commercial and office land uses, and 65 CNEL for the adjacent residential uses.

Project Impacts

Potential noise impacts are commonly divided into two groups; temporary and long term. Temporary (short-term) impacts are usually associated with noise generated by construction activities. Long-term impacts are further divided into impacts on surrounding land uses generated by the proposed Project and those impacts that occur at the proposed Project site.

Construction Impacts

The analysis of the construction phase delineates the impact of the Project on adjacent uses as well as impacts on uses along the haul route.³⁵

Off-Site Impacts

Construction noise represents a short-term impact on ambient noise levels. Noise generated by construction equipment, including trucks, graders, bulldozers, concrete mixers and portable generators can reach high levels. For the proposed Project, the highest noise generating activities would include demolition of the existing buildings.

Worst-case examples of construction noise at 50 feet are presented in Exhibit 4 of **Appendix 11**. The peak noise level for most of the equipment that would be used during the construction is 70 to 95 dBA at a distance of 50 feet. At 200 feet, the peak construction noise levels range from 58 to 83 dBA. At 400 feet, the peak noise levels range from 52 to 77 dBA. Note that these noise levels are based upon worst-case conditions. Typically, noise levels at the site would be less.

The nearest noise sensitive use that may be affected by construction and demolition noise is the Century Plaza Hotel located across from the Project on Avenue of the Stars. The near edge of the hotel property is located approximately 160 feet from the nearest demolition activities. Noise generated by demolition activities could reach as high as 85 dBA with typical maximum noise levels of approximately 72 dBA, as recorded at the outdoor area nearest the property boundary. Average outdoor noise levels during demolition would likely be approximately 67 dBA. The mid-rise structure of the hotel containing the guestrooms is located approximately 270 feet from the nearest demolition activities. Interior noise levels in the guestrooms could reach as high as 60 dBA with typical maximum noise levels of 47 dBA. Average interior demolition noise levels would likely be approximately 42 dBA. All other non-residential noise sensitive uses including the St. Regis Hotel and the Century City Hospital are located a greater distance from the construction area than the Century Plaza Hotel and would be less affected.

³⁵ Currently, the Project's haul route is not approved. However, for purposes of analysis, this document will assume the route to be as shown in Figure T-10.

Other noise sensitive uses include the Park Place Condominium complex, located across Olympic Boulevard from the Project. The near edge of this area is located approximately 215 feet from the nearest demolition activities. Noise generated by demolition activities could reach as high as 84 dBA with typical maximum noise levels of approximately 71 dBA, as recorded at the outdoor area nearest the property boundary. Average outdoor noise levels during demolition would likely be approximately 66 dBA. The Park Place Condominium buildings are located approximately 290 feet from the nearest demolition activities. Interior noise levels could reach as high as 60 dBA with typical maximum noise levels of 47 dBA. Average interior demolition noise levels would likely be approximately 42 dBA. All other residential areas, such as the Century Park East Condominiums, are located greater distances away from the construction areas than the Park Place Condominiums and would be less affected.

Construction and demolition activities would generate increased noise levels at the multi-family residential and hotel uses adjacent to the Project. This is a potentially significant impact. Construction hours would be limited by the City of Los Angeles Municipal Ordinance which designates the hours of the day during which construction activities are appropriate. Section 41.40 Chapter IV (Public Welfare) of the City of Los Angeles Municipal Code prohibits noise generating construction activities that may disturb nearby hotel occupants or residents before 7:00 a.m. or after 9:00 p.m. Monday through Friday. The Planning Department further restricts construction to no later than 6:00 p.m. Monday through Friday. All construction activity within 500 feet of residences or hotels is restricted before 8:00 a.m. or after 6:00 p.m. on Saturday or any national holiday, and at anytime on Sunday. Construction and demolition activities for the Project shall only occur during the hours allowed. Therefore, construction and demolition activities would not impact people during normal sleep times. These restrictions are included as mitigation measure N-1. The Project would also be required to comply with mitigation measures N-2 to N-6 which, would reduce temporary noise impacts. However, the construction noise impact would continue to be potentially significant.

Construction Vehicle Impacts

Off-site impacts from traffic noise are measured against two criteria. Both criteria must be met for a significant impact to be identified. First, the traffic noise increase due to the Project must be greater than 3 dB on a roadway segment adjacent to a noise sensitive land use. Second, the resulting future with Project noise level must exceed the criteria level for the noise sensitive land use. In this case, the criteria level is 65 CNEL for residential land uses.

In community noise assessments, changes in noise levels greater than 3 dB are often identified as significant, while changes less than 1 dB would not be discernible to local residents. In the range of 1 to 3 dB, residents who are very sensitive to noise may perceive a slight change. Note that there is no scientific evidence available to support the use of 3 dB as the significance threshold. In laboratory testing situations, humans are able to detect noise level changes of slightly less than 1 dB. In a community noise situation, however, noise exposures are over a long time period, and changes in noise levels occur over years, rather than the immediate comparison made in a laboratory situation. Therefore, the level at which changes in community noise levels become discernible is likely to be some value greater than 1 dB, and 3 dB appears to be appropriate for most people.

Trucks used to haul debris from the Project site during demolition would increase traffic noise levels along the haul route. Trucks would approach the Project site from the Santa Monica (I-10) Freeway exiting onto Overland Boulevard, turning right onto Pico and then left onto Avenue of the Stars. Leaving the Project site, the trucks would continue north on Avenue of the Stars, turn right onto Constellation, right onto Century Park East, right onto Pico Boulevard and left onto Overland Boulevard to the Santa Monica Freeway. Up to 41 truck round trips per day would be required to haul debris away from the site. This would result in 82 additional trucks on the haul route roads.

The greatest increase in construction traffic noise would occur along the roadway segment with the lowest existing traffic volume and currently generating the lowest levels of noise. Based on information received from Crain and Associates, the roadway segment with the lowest existing traffic volume is Century Park East north of Pico Boulevard. This roadway has an existing average daily traffic volume of 14,200 trips and a posted speed of 35 miles per hour. The additional trucks on this roadway would result in a 0.3 dB increase in the traffic noise CNEL levels along the roadway segment. This increase is not significant. Increases along all other roadway segments on the haul route would be less than 0.3 dB. Therefore, construction vehicles utilized for the Project would not result in a significant noise impact.

Operational Impacts

The analysis of the operational phase delineates the impact of the Project on surrounding uses as well as impacts from surrounding uses on the proposed Project. In addition, the different sources of noise have been broken out and their individual impacts have been identified.

Off-Site Impacts

Table V.I-2 shows traffic noise CNEL level changes on the roadways in the vicinity of the Project whose noise levels will be affected by the Project. Column 1 lists the roadway segments. Columns 2 and 3 show the increase in future noise levels over existing levels along the roadways listed. Column 2 shows the increase without the Project and Column 3 shows the increase with the Project. The last column of **Table V.I-2** shows the change in future noise levels with the Project. The proposed Project generates less traffic than the existing uses currently on the Project site. Therefore, the Project will result in a slight decrease in traffic noise levels on roadways in the vicinity of the Project. The negative numbers in the last column of **Table V.I-2** show the amount the traffic noise levels will be reduced with the Project.

The noise level impacts were calculated using traffic volume data presented in the traffic data prepared for the Project, set forth in **Appendix 11**.

Table V.I-2 shows that the traffic noise CNEL increase over existing conditions as high as 2.1 dB are projected to occur without the Project on Century Park West between Constellation Boulevard and Olympic Boulevard. This increase is due to growth in the Project area not associated with the Project. This increase is not substantial and will not be noticed by observers in the area. With the Project, the increase along this roadway segment is 1.9 dBA. This is 0.2 dB lower than the without Project projected increases over existing conditions.

The greatest increase with the Project over existing conditions is 1.9 dB along Century Park West between Santa Monica Boulevard and Olympic Boulevard. This increase is not substantial. Future noise levels will be lower by as much as 0.4 dB or unchanged with the Project compared to the without Project conditions. Because the Project results in lower traffic noise levels in the future it would not result in a significant off-site traffic noise impact.

For reference, **Table V.I-3** presents the distances to the Future (2005) with Project contours (60, 65 and 70 CNEL) for the roadways in the vicinity of the Project site. This is the distance from the centerline of the road to the contour value shown. The CNEL at 100 feet from the roadway centerline is also presented. The contours do not take into account the effect of any noise barriers or topography that may affect ambient noise levels. Areas with noise barriers or structures that break line of sight from a receptor to the roadway will experience lower levels. The traffic data used to calculate these noise levels is presented in Appendix 11.

Table V.I-2
Proposed Traffic Noise Level CNEL Increases (dB)

Roadway Segment	Future (2005) Increase Over Existing CNEL		Change In Future Noise Level With Project
	Without Project	With Project	
Constellation Boulevard			
Century Park West to Avenue of the Stars	2.0	1.8	-0.2
Avenue of the Stars to Century Park East	-0.1	-0.4	-0.4
Olympic Boulevard			
Overland Ave. to Beverly Glen Blvd.	0.7	0.6	-0.1
Beverly Glen Blvd. to Century Park West	0.8	0.7	-0.1
Century Park West to Avenue of the Stars	0.5	0.5	0.0
Avenue of the Stars to Century Park East	0.4	0.4	-0.1
Century Park East to Spalding Dr.	0.3	0.2	0.0
Galaxy Way			
Avenue of the Stars to Century Park East	-0.1	-0.1	0.0
Pico Boulevard			
Overland Ave. to Beverly Glen Blvd.	0.3	0.2	-0.1
Patricia Ave. to Beverly Glen Blvd.	0.2	0.1	-0.1
Beverly Glen Blvd. to Motor Ave.	0.5	0.4	-0.1
Motor Ave. to Avenue of the Stars	0.2	0.1	-0.1
Avenue of the Stars to Century Park East	0.5	0.4	0.0
Overland Avenue			
Olympic Blvd. to Pico Blvd.	0.9	0.9	0.0
Beverly Glen Boulevard			
Olympic Blvd. to Pico Blvd.	0.2	0.1	0.0
Century Park West			
Santa Monica Blvd. to Constellation Blvd.	2.0	1.9	-0.1
Constellation Blvd. to Olympic Blvd.	2.1	1.9	-0.1
Motor Avenue			
South of Pico Blvd	0.7	0.6	-0.1
Avenue of the Stars			
Constellation Blvd. to Olympic Blvd.	1.1	1.0	-0.1
Olympic Blvd. to Galaxy Way	1.4	1.4	-0.1
Galaxy Way to Pico Blvd.	1.1	1.0	-0.1
Century Park East			
Constellation Blvd. to Olympic Blvd.	0.7	0.6	-0.1
Olympic Blvd. to Pico Blvd.	1.0	0.8	-0.2
Spalding Drive			
North of Olympic Blvd.	0.7	0.7	0.0
Note: The difference between the increase in noise levels with and without the Project may not subtract exactly to the change in future noise levels with the Project due to rounding			

Table V.I-3
Future 2005 With Project Traffic Noise Levels

Roadway Segment	CNEL @ 100'†	Distance To CNEL Contour† (feet)		
		70 CNEL	65 CNEL	60 CNEL
Constellation Boulevard				
Century Park West to Avenue of the Stars	61.1	25	55	118
Avenue of the Stars to Century Park East	61.5	27	59	126
Olympic Boulevard				
Overland Ave. to Beverly Glen Blvd.	67.3	66	142	306
Beverly Glen Blvd. to Century Park West	67.6	69	148	320
Century Park West to Avenue of the Stars	67.0	63	136	293
Avenue of the Stars to Century Park East	67.0	63	136	294
Century Park East to Spalding Dr.	67.0	63	135	291
Galaxy Way				
Avenue of the Stars to Century Park East	52.9	RW	RW	34
Pico Boulevard				
Overland Ave. to Beverly Glen Blvd.	65.2	48	104	224
Patricia Ave. to Beverly Glen Blvd.	65.4	50	107	230
Beverly Glen Blvd. to Motor Ave.	65.1	47	102	220
Motor Ave. to Avenue of the Stars	66.0	54	116	250
Avenue of the Stars to Century Park East	65.3	49	105	226
Overland Avenue				
Olympic Blvd. to Pico Blvd.	59.7	RW	44	95
Beverly Glen Boulevard				
Olympic Blvd. to Pico Blvd.	60.5	RW	50	107
Century Park West				
Santa Monica Blvd. to Constellation Blvd.	59.7	RW	45	96
Constellation Blvd. to Olympic Blvd.	61.5	27	58	126
Motor Avenue				
South of Pico Blvd	61.6	28	60	129
Avenue of the Stars				
Constellation Blvd. to Olympic Blvd.	64.2	41	88	190
Olympic Blvd. to Galaxy Way	63.8	39	83	179
Galaxy Way to Pico Blvd.	63.5	37	80	172
Century Park East				
Constellation Blvd. to Olympic Blvd.	63.0	34	73	157
Olympic Blvd. to Pico Blvd.	61.6	28	60	129
Spalding Drive				
North of Olympic Blvd.	56.5	RW	27	58
† From Centerline of Roadway.				
RW-Contour falls within road right-of-way				

Table V.I-3 shows that Olympic Boulevard and Pico Boulevard will continue to generate the highest levels of noise in the Project area with noise levels along Pico Boulevard continuing to be slightly lower than along Olympic Boulevard. Noise levels along Constellation Boulevard, Overland Avenue, Beverly Glen Boulevard, Century Park West, Motor Avenue, Avenue of the Stars, Century Park East and Spalding Drive will continue to be moderate. Traffic noise levels along Galaxy Way will remain minor.

There are no on-site activities proposed that would be expected to generate significant levels of noise. The nearest noise sensitive uses are located across major roadways. The Century Plaza Hotel is located across Avenue of the Stars and the Park Place Condominiums and Century Park East Condominiums are located across Olympic Boulevard. Noise levels generated by typical activities on a project of this type are not expected to be significantly greater than the noise generated by the roadways. In any case, noise generated by any activity on the Project site would need to comply with the City's Noise Ordinance (Municipal Code Chapter XI). By complying with the Noise Ordinance, the Project would not result in a significant noise impact due to on-site activities.

The Project does provide a code required helipad on the roof of the proposed building for emergency use. No commercial use would be permitted. Noise impacts from emergency helicopters would be adverse but not significant due to restriction of helipad operations to emergency situations.

On-Site Impacts

This section examines traffic noise impacts on the proposed uses. The Los Angeles County Municipal Code Interior Noise standard requires that future noise levels be predicted for a year at least ten years from issuance of building permit. Noise generated by traffic on Constellation Boulevard, Avenue of the Stars and Olympic Boulevard would impact the proposed Project. Future year 2015 traffic volumes and speeds were obtained from Crain & Associates and used to predict the noise levels at the proposed buildings. This data is presented in the appendix of the noise study.

An estimate of highway noise levels in terms of CNEL was computed using the Highway Noise Model published by the Federal Highway Administration ("FHWA Highway Traffic Noise Prediction Model," FHWA-RD-77-108, December, 1978). The CALVENO noise emission curves developed by Caltrans were used with the FHWA model. These curves which represent how much noise composite vehicles generate at different speeds, better model the California vehicle mix than those in the FHWA model. The FHWA Model uses traffic volume, vehicle mix, vehicle speed, and roadway geometry to compute the "equivalent noise level." A computer code has been written which computes equivalent noise levels for each of the time periods used in the calculation of CNEL. Weighting these noise levels and summing them results in the CNEL for the traffic projections used.

The proposed building is located approximately 70 feet from the centerline of Constellation Boulevard, 110 feet from the centerline of Avenue of the Stars and 170 feet from the centerline of Olympic Boulevard. Exterior traffic noise levels at the building face would be approximately 64.0 CNEL along Constellation Boulevard, 64.0 CNEL along Avenue of the Stars, and 64.0 CNEL along Olympic Boulevard.

Commercial buildings achieve at least 20 dBA of outdoor to indoor noise reduction with windows closed. The windows closed assumption requires that adequate ventilation be provided. Note that the windows do not need to be sealed shut but closeable at the occupants discretion. Air conditioning typically used for commercial buildings provides adequate ventilation.

Interior traffic noise levels for the Project would be less than 45 CNEL and therefore, fall below the interior noise criteria applicable to the proposed Project. The Project would not be significantly affected by traffic noise.

Mitigation Measures

Implementation of the following mitigation measures would reduce potential impacts but the project could still result in a potentially significant impact.

- N-1 All exterior construction and demolition activities located within 500 feet of a residence or hotel shall occur between 7:00 am and 6:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday, pursuant to the City of Los Angeles Municipal Code Section 41.40.
- N-2 Construction equipment shall use noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise. Construction operations shall be staged as far from sensitive uses as feasible.
- N-3 Maintain all sound reducing devices and restrictions throughout the construction period.
- N-4 Locate any delivery, truck loading or trash pickup areas as far from noise sensitive land uses as possible to the extent feasible.
- N-5 The project shall comply with the City of Los Angeles Municipal Code Chapter XI, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- N-6 The project sponsor must comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.

Significant Project Impacts After Mitigation

With implementation of the proposed mitigation measures, the Project could still result in a potentially significant construction impact, however the Project would not result in a significant operational impact.

Cumulative Impacts

Cumulative Construction Impacts

The Environmental Setting Section (Section IV) provides a list of projects that are planned or are under construction in the Project area. Most of the development planned for the area is within the intensely developed portions of West Los Angeles, Century City, and Beverly Hills. In close proximity to the site are the Constellation Place, Fox Studio expansion, the Santa Monica Boulevard Transit Parkway and the Westfield Shoppingtown Century City projects. Other related projects to be constructed in the area of the proposed Project would be subject to a CEQA analysis, and likely include mitigation measures to reduce construction noise impacts. However, the increase in construction noise for the proposed Project and the potential for increased construction noise from related projects, could result in a potentially significant cumulative construction noise impact.

Cumulative Operational Impacts

The proposed Project would result in a reduction in the amount of noise associated with the operation of the Project. Therefore, the Project would not contribute to cumulative operational noise impacts in the area.

J. POPULATION AND HOUSING

Existing Conditions

Existing On-Site Population and Housing

The subject property is occupied with a mix of land uses including office, restaurant, retail, theater and recreation. There are no existing residences or forms of housing located on the property.

Existing Regional and Local Population and Population Projections

The Southern California Association of Governments (SCAG), based on input provided by local jurisdictions, prepares regional population, housing and employment projections. These projections are reported in the Growth Management Chapter of SCAG's Regional Comprehensive Plan and Guide (RCPG). The proposed Project site falls within the City of Los Angeles subregion of the six-county SCAG region. This subregion includes the City of Los Angeles and surrounding area within the jurisdiction of Los Angeles County. The 2000 population for this area was 3,823,062, and is expected to grow to 4,210,853 by 2010. These figures reflect a 10 percent population increase from 1990 to 2010. The number of housing units in the Los Angeles subregion is expected to grow from about 1,276,318 in 2000 to 1,417,670 in 2010. Employment in the year 2010 is projected at 1,931,000, an increase of 148,847 jobs as compared to the year 2000 employment level of 1,782,153.³⁶

The City of Los Angeles General Plan Framework disaggregates SCAG's total Citywide population estimate into figures for each of the City's community plan areas. These forecasts represent a planning horizon to be used as the basis for implementation of infrastructure and services to support growth; they are not intended to reflect minimum or maximum planned land use capacities. The City's forecast represents future 2010 population estimates anticipated at the time the General Plan Framework document was prepared (1993). The City's total population is expected to grow from about 3,485,399 people in 1990 to 4,306,500 in 2010, a 24 percent increase³⁷. The West Los Angeles Community Plan Area population is projected to grow from 68,060 people in 1990 to a 2010 population of about 83,330.³⁸ The 22 percent population growth for the West Los Angeles Community Plan area is slightly lower than the City's overall growth rate of (24 percent) for the 1990-2010 time frame. The West Los Angeles Community Plan area population comprises about 1.9 percent of the City's total population.

The West Los Angeles Community Plan recognizes the Framework's population estimate as a regional forecast provided for reference in the Community Plan update process. However, these estimates do not always reflect planned land use capacity or build-out estimates. The Community Plan estimates residential capacity within the Plan area; in contrast, the Framework estimates projected population growth. The Community Plan estimates assume development to levels that reflect the midpoint of the allowable number of dwelling units per net acre for each of the residential land use classifications. The resulting number of dwelling units is 40,309 and the "reasonable expected" population estimate for 2010 is 83,331 people.³⁹

³⁶ Population, housing and employment figures were provided by SCAG in their January 28, 2002 NOP response letter.

³⁷ City of Los Angeles General Plan Framework Element, Table 2-1, Comparison of SCAG 2010 Forecast and Framework 2010 Forecast. www.lacity.org/pln/framework/chapters/02/02.htm

³⁸ City of Los Angeles General Plan Framework Element, Table 2-2, Forecast Growth by Subregions and Community Plan Area. www.lacity.org/pln/framework/chapters/02/02.htm

³⁹ This population estimate does not include housing within commercial districts nor does it reflect vacancy rates.

Existing Regional and Local Housing Stock

The City of Los Angeles currently has about 1.3 million dwelling units.⁴⁰ Within the West Los Angeles area there are about 33,725 units.⁴¹ Of the total City housing stock, about 39,900 units are considered affordable, primarily through Federal, State, and local funding programs.

Population and Housing Policy

The following discussion identifies current policy regarding regional and local population, housing and employment issues, as contained in the following planning documents:

- The Southern California Association of Governments' Regional Comprehensive Plan and Guide and
- The City of Los Angeles General Plan: Framework Element and Housing Element. (www.lacity.org/pln/framework/fwhome0.htm)

Southern California Association of Governments' Regional Comprehensive Plan and Guide

The Southern California Association of Governments' Regional Comprehensive Plan and Guide (RCPG) identifies a broad set of goals and policies for the region and implementation strategies for agencies to use in guiding their decision-making. Applicable policies pertaining to population and housing issues as contained in the Growth Management Chapter include:

- *Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.*
- *Encourage patterns of urban development and land use, which reduce costs on infrastructure construction and make better use of existing facilities.*
- *Support provisions and incentives created by local jurisdictions to attract housing growth in job rich sub-regions and job growth in housing rich sub-regions.*
- *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*
- *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*
- *Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems and activity centers.*
- *Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.*
- *Support and encourage settlement patterns, which contain a range of urban densities.*
- *Encourage planned development in locations least likely to cause adverse environmental impact.*
- *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*

City of Los Angeles General Plan Framework Element

The City of Los Angeles Framework Element provides a strategy for long-term growth that sets a Citywide context to guide subsequent amendments to the City's community plans, zoning

⁴⁰ Draft City of Los Angeles Housing Element, Los Angeles Department of City Planning, December 1999, Page 2-5.

⁴¹ Ibid, Page 2-19.

ordinances, and other pertinent programs. In developing this strategy, this planning document uses population forecasts provided by SCAG, but recognizes these projections are an estimate of potential growth that may or may not occur. The strategy presented in the Framework Element establishes policies to best accommodate this growth when and if it should occur. The Framework's general approach is to accommodate growth by encouraging higher intensity commercial and mixed-use districts, centers, and boulevards that are linked to infrastructure, thereby preserving single-family neighborhoods.

The Framework's Housing Chapter states the following applicable goal and related objectives:

Goal 4A *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Objective 4.1 *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.*

Objective 4.2 *Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.*

Objective 4.3 *Conserve scale and character of residential neighborhoods.*

City of Los Angeles General Plan: Housing Element

The Housing Element of the City's General Plan provides a Citywide strategy for short-term housing development that establishes a guide for all housing activities in the City. The Housing Element consists of identification and analysis of existing and projected housing needs for all economic segments of the community, a statement of goals, policies, financial resources, and scheduled programs for the preservation, improvement, and production of housing. The Department of City Planning is currently in the process of seeking Planning Commission approval of an updated Housing Element for 1998-2005. A third draft dated December 1999 is currently under consideration but has not yet been adopted by the City. Therefore, this analysis presents policy as contained in the latest adopted Housing Element (1993). This document includes the following applicable goals:

- Provide an adequate supply of housing accessible to persons of all income levels.
- Provide sufficient ownership and rental housing to meet the City's need.
- Provide housing opportunities accessible to all City residents without discrimination.
- Maintain a sense of community by conserving and improving existing housing stock.
- Provide housing, jobs, and services in close proximity, as a means of reducing average vehicle trip length.
- [Provide] Well-designed housing with amenities.
- [Provide] Energy efficient housing.

Threshold of Significance

According to the City of Los Angeles Draft CEQA Thresholds Guide (1998, p. B.1-3), a finding of significance involving population and housing growth shall be made on a case by case basis, considering the following factors:

- The degree to which the project would cause growth or accelerate development in an undeveloped area that exceeds projected planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment;

- Whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and
- The extent to which growth would occur without implementation of the project.

Project Impacts

Population Growth

The proposed Project would remove the existing uses and redevelop the site with a mix of office, retail, restaurant and cultural uses. The proposed Project would not remove or provide any form of housing and would not be considered a population generating use. Therefore, the proposed Project would not result in a significant impact with respect to consistency with local and regional planning projections regarding population and housing growth.

The proposed Project would generate new jobs at the Project site. The number of net new jobs created is estimated at 501 jobs⁴². SCAG projects employment in the year 2010 for the region to be 1,931,000, an increase of 148,847 jobs as compared to the year 2000 employment level of 1,782,153. The number of net new jobs created by the Project would be within SCAG's regional growth projections for the Los Angeles subregion. Therefore, the proposed Project would not result in a significant impact with respect to consistency with local and regional planning projections regarding employment growth.

Consistency with Population Growth and Housing Policy

Table V.J-1 contains an analysis of the Project's consistency with each of the policies as contained in regional and local planning documents. Based on this analysis, the proposed Project would not conflict with or hinder the attainment of regional and local policies regarding population growth, housing and employment. See Section V.H, Land Use, for a discussion of the Project's consistency with other applicable SCAG policies.

Housing Displacement

The subject property is developed with a variety of commercial uses which do not include any form of residential units or housing. The proposed Project would remove the existing facilities and redevelop the site with several uses including office, retail, restaurant and cultural uses. The Project would not result in the displacement of any form of housing.

Mitigation Measures

The proposed Project would not result in a significant adverse impact with respect to population or employment growth or housing supply and therefore mitigation measures are not required.

Significant Project Impacts After Mitigation

The proposed Project would not result in a significant adverse impact with respect to population, housing or employment growth, housing supply, affordability, or displacement or applicable policy.

Cumulative Impacts

Section IV provides a list of projects that are planned or under construction in the Project area. Although most of the 42 projects will develop commercial office or retail space, 14 residential projects will add a total of 776 units in the area. Based on a multiplier of 2.07 persons per dwelling unit, the population of the West Los Angeles area would increase by approximately 1,606. The population increase attributable to the proposed Project (0 people) plus related projects would remain well within

⁴² Net job creation is calculated assuming one employee per 200 square feet, multiplied by the net increase in floor area (100,125 sf) created by the Project.

the projected 2000-2010 population increase for SCAG's Los Angeles subregion of 387,791 people⁴³ and the West Los Angeles Community Plan Area of 15,270 people⁴⁴. The proposed Project would also create a number of jobs in the West Los Angeles area that would support the growing population of the West Los Angeles region. The increase in the number of jobs as a result of the Project is anticipated to be within SCAG's employment projection. Therefore, cumulative impacts would not be significant. Related projects would also need to be assessed for consistency with population and housing goals and policies, as well as for housing displacement impacts. Since the Project does not cause impacts with regard to these particular issues, it would not contribute to any cumulative impact.

Table V.J-1
Population Growth and Housing Policy Consistency Analysis

Plan/Policy	Project Analysis
SCAG Regional Comprehensive Plan and Guide and City Goals and Objectives	
<i>Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.</i>	<p>Consistent. The proposed Project would provide additional job opportunities for office professionals within Century City, which has been identified as a Regional Center by the City of Los Angeles General Plan. Statistics in the West Los Angeles Community Plan show that the average price of a home in the area around the Project is much higher than the citywide average. Therefore, the addition of professional office positions in the area would support incomes capable of residing in the area.</p>
<i>Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.</i>	<p>Consistent. The proposed Project would redevelop an underutilized site within an existing urban area that is served by existing infrastructure. The Project would make use of the existing infrastructure without creating a need for substantial additional infrastructure. Century City is a central commercial area, which is well located and planned near residential neighborhoods, allowing for reduced commuting distances for many employees.</p>

⁴³ Population, housing and employment figures were provided by SCAG in their January 28, 2002 NOP response letter.

⁴⁴ City of Los Angeles General Plan Framework Element, Table 2-2, Forecast Growth by Subregions and Community Plan Area.

Table V.J-1 (Cont.)
Population Growth and Housing Policy Consistency Analysis

Plan/Policy	Project Analysis
SCAG Regional Comprehensive Plan and Guide and City Goals and Objectives	
<p><i>Support provisions and incentives created by local jurisdictions to attract housing growth in job rich subregions and job growth in housing rich subregions.</i></p>	<p>Not Applicable. The City of Los Angeles General Plan identifies Century City as a Regional Center intended for development of commercial, cultural, residential, recreational and light industrial uses. Currently the subject property is planned and zoned for commercial uses and is occupied by two commercial structures. The Project would redevelop the site consistent with planning and zoning for the site. Development according to adopted plans is assumed in General Plan and SCAG projections, and the Project would therefore be consistent with projections. On a wider community, City and regional scale, plans call for complementary residential to balance the planned commercial development.</p>
<p><i>Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.</i></p>	<p>Consistent. The site is easily accessible from area roadways and mass transit. The proposed Project is not anticipated to generate a significant alteration of the existing distribution of population or employment base. Residential housing units are located adjacent and proximate to the Project site. This proximity, as well as the provision of restaurants in conjunction with existing and proposed office uses in Century City would shorten and/or avoid vehicle trips during lunch hours, and often delay evening return trips as commuters stay for dinner, shopping or entertainment near work. The Project site is also adjacent to bus transit along Avenue of the Stars and Constellation Boulevard, and will include bicycle parking spaces, both of which reduce automobile trips and facilitate use of alternative modes of travel. In addition, the Project will be implementing a TDM program that will encourage the use of transit, reduce auto trips and vehicle miles traveled and create opportunities to walk or bike to the site.</p>

Table V.J-1 (Cont.)
Population Growth and Housing Policy Consistency Analysis

Plan/Policy	Project Analysis
SCAG Regional Comprehensive Plan and Guide and City Goals and Objectives	
<i>Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.</i>	Consistent. The proposed Project would replace/redevelop two commercial structures and associated facilities. Implementation of the Project would increase the use of a currently underutilized site within the heart of the Century City North Specific Plan.
<i>Support local plans to increase density of future development located at strategic points along the regional commuter rail, transit systems and activity centers.</i>	Consistent. The proposed Project would increase the density of development at a site within Century City, a Regional Center. As a Regional Center, Century City has been identified as an area of intense urban development. The site is also accessible to bus transit lines along Avenue of the Stars and Constellation Boulevard.
<i>Encourage developments in and around activity centers, transportation corridors, underutilized infrastructure systems, and areas needing recycling and redevelopment.</i>	Consistent. The proposed Project would redevelop and revitalize a currently underutilized site located within Century City, and identified Regional Center in the City of Los Angeles General Plan. It is also one block south of the Santa Monica Boulevard transportation corridor.
<i>Support and encourage settlement patterns which contain a range of urban densities.</i>	Consistent. The proposed Project would develop the site with an FAR that is consistent with the urban scale of Century City. As a mixed-use development, the Project would provide additional office space with facilities to serve the needs of the occupants.
<i>Encourage planned development in locations least likely to cause adverse environmental impact.</i>	Consistent. The proposed Project would be developed on an underutilized site that is surrounded by urban development of similar use, scale and character to that proposed. This reduces the possibility that the Project would create adverse environmental impacts. Proposed Project development is consistent with plans and zoning for the site.

Table V.J-1 (Cont.)
Population Growth and Housing Policy Consistency Analysis

Plan/Policy	Project Analysis
SCAG Regional Comprehensive Plan and Guide and City Goals and Objectives	
<p><i>Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.</i></p>	<p>Consistent. The Project would remove two existing structures and redevelop the site with a mix of land uses. The existing buildings are not considered significant historical resources. A six-level subterranean parking garage is currently located underneath the subject property. No grading below the fill materials located under the parking garage would occur as a result of the Project. Therefore, the proposed Project is not expected to result in significant impact on archaeological resources.</p>
<p><i>Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.</i></p>	<p>Not Applicable. The existing uses do not include residential units or any other forms of housing. However the proposed commercial Project is adjacent to residential uses and close to other residential neighborhoods, working together as a mixed-use community.</p> <p>The West Los Angeles Community Plan has identified Century City as a Regional Center. The City of Los Angeles General Plan, defines Regional Centers as areas planned for a variety of high-intensity urban uses. The proposed Project would replace existing commercial uses, and would not hinder the attainment of housing goals as it would continue commercial use of a site planned and zoned for such use.</p>
<p><i>Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.</i></p>	<p>Not Applicable. The existing uses do not include residential units or any other forms of housing. Nor does the Project propose any form of housing. The Project would not affect the projections of the General Plan or SCAG, as it is a replacement of commercial uses on a currently commercially developed, planned and zoned site. Development of the site for commercial uses is already consistent with agency projections for the area.</p> <p>The Project would restore job opportunities on the site and the City of Los Angeles and surrounding areas include a large employment base. The jobs to be created are professional level jobs that require an educated work force, commensurate with the West Los Angeles/Beverly Hills location. Therefore, it is likely that employees could be found in nearby areas.</p>

Table V.J-1 (Cont.)
Population Growth and Housing Policy Consistency Analysis

Plan/Policy	Project Analysis
SCAG Regional Comprehensive Plan and Guide and City Goals and Objectives	
<i>Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.</i>	Not Applicable. The existing uses do not include residential units or any other forms of housing, but is part of a large commercial center adjacent to multi-family housing, with additional multi-family housing nearby. The site is proximate to the transit corridors (see above).
<i>Conserve scale and character of residential neighborhoods.</i>	Not Applicable. The proposed Project is a redevelopment of a similar commercial use within primarily commercial urban area. No housing would be displaced or neighborhoods affected by the Project.
<i>Provide an adequate supply of housing accessible to persons of all income levels.</i>	Not Applicable. The proposed Project would redevelop a commercially zoned site with commercial uses. It does not include residential units or any other forms of housing.
<i>Provide sufficient ownership and rental housing to meet the City's need.</i>	Not Applicable. The proposed Project does not include residential units or any other forms of housing.
<i>Provide housing opportunities accessible to all City residents without discrimination.</i>	Not Applicable. The proposed Project does not include residential units or any other forms of housing.
<i>Maintain a sense of community by conserving and improving existing housing stock.</i>	Not Applicable. The existing uses do not include residential units or any other forms of housing. Redevelopment of the subject property would not include any form of housing.
<i>Provide housing, jobs, and services in close proximity, as a means of reducing average vehicle trip length.</i>	Consistent. The existing uses do not include residential units or any other forms of housing. However the proposed commercial Project is adjacent to residential uses and close to other residential neighborhoods, working together as a mixed-use community.

Table V.J-1 (Cont.)
Population Growth and Housing Policy Consistency Analysis

Plan/Policy	Project Analysis
SCAG Regional Comprehensive Plan and Guide and City Goals and Objectives	
	<p>The West Los Angeles Community Plan has identified Century City as a Regional Center. The City of Los Angeles General Plan defines Regional Centers as areas planned for a variety of high-intensity urban uses. The proposed project would replace existing commercial uses, and would not hinder the attainment of housing goals as it would continue commercial use of a site planned and zoned for such use.</p> <p>While the Project would create new job opportunities, the City of Los Angeles and surrounding areas include a large employment base. The jobs to be created are professional level jobs that require an educated work force, commensurate with the West Los Angeles/Beverly Hills location. Therefore, employees could be found in nearby areas.</p> <p>The site also is very accessible from area mass transit, with bus transit available along Avenue of the Stars and Constellation Boulevard and the project will include bicycle parking spaces, helping to reduce automobile trips and facilitate use of alternative modes of travel.</p>
<i>[Provide] Well-designed housing with amenities.</i>	Not Applicable. The Project does not propose to include any form of housing.
<i>[Provide] Energy efficient housing.</i>	Not Applicable. Although not a housing project, the proposed Project provides energy conservation benefits. It would replace two old inefficient buildings with a new building that would incorporate improved energy technology and current energy efficiency standards, as reflected in the City building code and new appliance specifications.

K. PUBLIC SERVICES

1. Fire Protection

Existing Conditions

Fire protection and emergency medical service to the subject property is provided by the Los Angeles Fire Department (LAFD). The LAFD responds to incidents requiring fire protection and emergency medical care with LAFD personnel and emergency medical technicians. According to the LAFD, fire protection services would primarily be provided by three fire stations. They are the closest to the Project site and would provide the shortest response time in the event of an emergency. These stations include Fire Station No. 92 at 10556 W. Pico Boulevard (1.3 miles), Fire Station No. 58 at 1556 S. Robertson Boulevard (2.1 miles), and Fire Station No. 59 at 1090 Veteran Avenue (2.3 miles) (**Figure PS-1**). If necessary during a major emergency, additional fire protection and emergency services would be provided by other stations within the LAFD system; however, it is assumed that the three stations above would provide the initial response under normal conditions. All three primary-serving LAFD fire stations are located within 2.5 miles of the Project site. Station location, distance to the Project site, and equipment are included in **Table V.K1-1**. According to the LAFD, current staffing is adequate to meet existing demand for service in the area.

Table V.K1-1
Fire Station Information

Station	Distance to Project	Equipment
#92 10556 W. Pico Blvd.	1.3 miles	Task Force Truck Engine Company Paramedic Supervisor Staff - 11
#58 1556 S. Robertson Blvd.	2.1 miles	Task Force Truck Engine Company Staff - 10
#59 1090 Veteran Avenue.	2.3 miles	Task Force Truck Engine Company Paramedic Rescue Ambulance Battalion 9 Headquarters Staff - 13

Threshold of Significance

According to the City of Los Angeles Draft CEQA Thresholds Guide (1998, p. J.2-3), a finding of significance involving fire protection services would result if:

- The proposed Project results in the need for an additional fire station, or expansion, consolidation, or relocation of an existing fire station to maintain service;

Figure PS-1 Public Services

Additionally, the LAFD (**Appendix 12**, p. 1) has indicated that the adequacy of fire protection for a given area is based on:

- Response distance from existing fire stations;
- Adequate hydrants and water flow/volume or pressure to serve the project; and
- LAFD's judgment for fire protection needs in the area.

Project Impacts

The adequacy of fire protection services for the proposed Project is based on required fire flow, response distance from existing fire stations, equipment access, and the Fire Department's judgment regarding needs and service in the area. The quantity of water required for fire protection varies based on a proposed project's land use(s). Fire flow requirements vary from 2,000 gallons per minute (gpm) in Low-Density Residential areas to 12,000 gpm in commercial areas. Based on a review of the proposed Project land uses, the LAFD has required that a fire flow of 9,000 gpm⁴⁵ from any block hydrants flowing simultaneously be maintained. A minimum residual water pressure of 20 psi must remain in the system while the required fire flow is being delivered. The actual number and location of required fire hydrants would be determined during the Fire Department's review of the plot plan.

Currently, adequate water pressure is available to serve new development in the Project vicinity. According to the Los Angeles Department of Water and Power (DWP), existing mains proximate to the Project include: 12 inch mains beneath Century Park East and Avenue of the Stars, and an eight-inch main under Constellation Boulevard. The existing system has a fire flow capacity of 9,000 gpm. This meets LAFD required fire flow for this Project therefore, the proposed Project would not result in a significant impact on the fire water supply system.

The LAFD requires that all projects either: 1) be located within 1.5 miles of the nearest fire station, or 2) if this distance cannot be achieved, include an interior sprinkler system in the Project as a means of fire protection. Fire Station No. 92 is located within 1.3 miles of the Project site. This station maintains a full staff and would be able to serve as the first station to provide full truck and engine company service to the site. The proposed Project could be adequately served by the existing facilities, equipment and staff, and would therefore not generate a significant impact on fire services. The Project traffic analysis demonstrates that Project impacts to vehicular traffic would be less than significant after mitigation. Thus, the Project would not significantly impact response times. Regardless, the Project would install an automatic fire sprinkler system and two electric/emergency driven fire pumps with a combined capacity of 1,250 gallons per minute. The pumps would be located in the subterranean parking garage on the south exterior wall portion of level F. Water to the pump would be supplied from a new on-site 75,000 gallon storage tank also located on level F. The existing 40,000 gallon water tank located on level A currently serves the entire Project site. This storage tank would remain but would be modified to service only the parking garage and Century Plaza Tower buildings.

With regard to access to the Project site, the proposed Project would maintain adequate access for the LAFD. The Project site plan conforms to access requirements of the Los Angeles Municipal Code. Compliance will be confirmed by the LAFD during plot plan review, prior to construction. Therefore, the proposed Project would not result in a significant impact on fire department access to the proposed site or adjacent properties.

Mitigation Measures

Although Project impacts would be less than significant, the following are included as mitigation measures in order to disclose and make clear the City's requirements.

⁴⁵ Telephone conversation with Inspector Joseph Jackson of the Los Angeles Fire Department Construction Services Unit, April 4, 2002, and Appendix 13 LAFD correspondence.

The following recommendations of the Fire Department relative to fire safety shall be incorporated, unless otherwise approved, into the building plans where feasible. This condition shall not require existing development on the site to comply with these provisions.

- FP-1** Project building plans shall include the submittal of a plot plan for approval by the Fire Department either prior to the recordation of the final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; and all structures must be within 300 feet of an approved fire hydrant.
- FP-2** The applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features appropriate to the design of the Project.
- FP-3** Construction of new public or private roadway in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.
- FP-4** The Project shall utilize standard cut-corners on all turns, if applicable.
- FP-5** Fire Department access shall remain clear and unobstructed during demolition.
- FP-6** If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area.
- FP-7** No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
- FP-8** If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway.
- FP-9** No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway, of an improved street, access road, or designated fire lane, unless otherwise approved.
- FP-10** Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.
- FP-11** Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.
- FP-12** The Project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles, unless otherwise approved.

Significant Project Impacts After Mitigation

No significant Project impacts would remain after the implementation of the identified mitigation measures.

Cumulative Impacts

The proposed Project site is currently developed with uses that require similar LAFD resources as the proposed Project. Future development has the potential to increase the population and density of the area and could potentially have a cumulative impact on fire protection services. However, any cumulative development would be subject to fire protection and safety measures, as with the proposed Project, to adequately mitigate fire protection impacts. The related projects would be required to comply with all Fire Department development review criteria. The proposed Project has a less than significant impact and would not substantially contribute to cumulative impacts.

2. Police Protection

Existing Conditions

The Los Angeles Police Department (LAPD), West Los Angeles Area, Reporting District (RD) 839 provides police protection in the Century City area. The West Los Angeles Area service boundaries are Mulholland Drive to the north, the Santa Monica Freeway (I-10) and the Los Angeles City Boundary to the south, the Los Angeles City boundary to the west, and La Cienega Boulevard and the Los Angeles City boundary to the east. The closest station to the proposed Project site is located at 1663 Butler Avenue, approximately 3.0 miles away (**Figure PS-1**).

Currently there are 259 sworn officers and 33 non-sworn employees providing service to the West Los Angeles Area. Officers are dispatched over three watches in a 24-hour period. The West Los Angeles Station serves a population of approximately 225,000 people over a 64.3 square mile area. In the event that a situation should arise that requires additional staffing, additional officers can be called in from other LAPD Districts.

The average response time to emergency calls for service in West Los Angeles during 2001 was 8.7 minutes. The Citywide average during 2001 was 8.9 minutes. Within West Los Angeles, 34 crimes per 1,000 people were committed in 2001.

Private security service to the entire property is provided by Universal Protection Service. Universal Protection Service provides unarmed lobby ambassadors, security officers and parking officers who monitor safety and security. The entire site has a full time staff of 48 officers, which includes an on-site Director of Security and an on-site Operations Manager. Security in the Century Plaza Towers is responsible for controlling access in both towers, assisting visitors, messengers, loading dock deliveries as well as patrolling all levels of the parking garage and common areas of the property.

As a result of the September 11th tragedy, security services have been increased to include visitor and tenant bag checks, and trunk checks for all visitor and tenant vehicles that do not display the proper parking pass. In addition, a thorough inspection of all delivery vehicles is performed prior to entering the loading dock. Staffing throughout the site has been increased in the form of additional man hours.

Threshold of Significance

According to The City of Los Angeles Draft CEQA Thresholds Guide (1998, p. J.1-2), a finding of significance involving police protection services shall be made on a case by case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area;
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and
- Whether the project includes security and/or design features that would reduce the demand for police services.

Project Impacts

Development of the proposed Project would not generate additional residents, or pedestrians, and would reduce vehicular traffic in the Project area. Therefore, it is unlikely that the Project would result in a substantial increase in demands for law enforcement and protection services provided by the LAPD. The existing on-site Shubert Theater, Lowe's Cineplex, and nightclubs are primarily nighttime driven activities drawing visitors from the surrounding region. These would be removed, and replaced

predominantly with office space. The resulting use would primarily be a daytime (8 a.m. to 6 p.m.) activity. The LAPD in response to the Notice of Preparation (NOP) issued for the Project, has indicated that a project of this size would have a significant impact on police services (see **Appendix 12**). The Project would utilize private on-site security and install video cameras to monitor the site. The Project traffic analysis demonstrates that Project impacts to vehicular traffic would be less than significant after mitigation. Thus, the Project would not significantly impact response times. Additionally, tax revenue generated by the proposed Project would add funding to City of Los Angeles for distribution to City Departments, including the LAPD. Project compliance with City requirements, Project design features (such as closed circuit monitoring and private security), and implementation of mitigation measures PS-1 to PS-3 would result in a less than significant impact to police services.

The current security program would be maintained and include the proposed Project. The necessary security levels for the new development and the entire Project site would be maintained to ensure a safe site. The planned development would also benefit from implementation of some of the latest technology in security hardware and electronics.

Mitigation Measures

The following mitigation measures would reduce potential impacts to police services to a less than significant level:

- PS-1** The applicant shall consult with the Los Angeles Police Department Crime Prevention Unit on crime prevention features appropriate to the design of the Project.
- PS-2** Entryways, elevators, lobbies, and parking areas shall be well illuminated and designed with a minimum of visual dead space to eliminate areas of concealment.
- PS-3** Upon completion of the Project, the owner shall provide the West Los Angeles Area Commanding Officer with a diagram of each portion of the property, including access routes and additional information that might facilitate police response.

Significant Impacts After Mitigation

No significant adverse impacts are anticipated to occur through implementation of the proposed Project with mitigation.

Cumulative Impacts

The proposed Project site is currently developed with uses that require similar LAPD resources as the proposed Project. Future development has the potential to increase the population and density of the area and could potentially have a cumulative impact on police protection services. However, any cumulative development would be subject to police protection and safety measures, as with the proposed Project, to adequately mitigate police service impacts. The related projects would be required to comply with all Police Department development review criteria. The proposed Project has a less than significant impact after mitigation and would not substantially contribute to cumulative impacts.

3. Schools

Existing Conditions

The Los Angeles Unified School District (LAUSD) provides public education for grades K-12 in the Project area. School service needs are related to the size of the residential population, the geographic area served, and community characteristics. Projects that affect these factors may increase demand for public school facilities.

Local public schools serving the site are Westwood Elementary, Emerson Middle School, Webster Middle School, and Hamilton High School (**Figure PS-1**). Westwood Elementary is located at 2050 Selby Avenue. Emerson Middle School is located at 1650 Selby Avenue. Webster Middle School is located at 11330 West Graham Place. Hamilton High School is located at 2955 South Roberston Boulevard.

Westwood Elementary School has an operational capacity for 843⁴⁶ students in Kindergarten through 5th grades. In year 2000, about 734⁴⁷ students were enrolled at this school, resulting in excess capacity of about 109 students.

Emerson Middle School serves grades 6 through 8. The school has an operational capacity for 1,502 students. In year 2000, approximately 1,403 students were enrolled at this school, resulting in excess capacity of about 99 students.

Webster Middle School serves grades 6 through 8. The school has an operational capacity for 1,444 students. In year 2000, approximately 1,228 students were enrolled at this school, resulting in excess capacity of about 216 students.

Hamilton High School has a capacity for 2,789 students. Year 2000 enrollment figures indicate that about 1,714 students attended the school, resulting in excess capacity of about 1,075 students.

Table V.K3-1
Existing Student Enrollment

School	Location	Student Enrollment	
		Total	Capacity
Westwood Elementary	615 Holmby Avenue	734	843
Emerson Middle School	1650 Selby Avenue	1,403	1,502
Webster Middle School	11330 West Graham Place	1,228	1,444
Hamilton High School	2955 South Robertson Boulevard	1,714	2,789

Threshold of Significance

According to the City of Los Angeles Draft CEQA Thresholds Guide (1998, p. J.3-2), a finding of significance involving public school services shall be made on a case by case basis, considering the following factors:

⁴⁶ Capacity information was obtained from the City of Los Angeles Draft CEQA Thresholds Guide, May 14, 1998, City of Los Angeles Environmental Affairs Department, Exhibit J.3-8.

⁴⁷ 2000-01 student enrollment information was obtained from the Los Angeles Unified School District, School Information Branch Planning, Assessment and Research Division; "School Profiles" at www.lausd.k12.ca.us/lausd/offices/icb/, November 29, 2001

- The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment and personnel) and the project's proportional contribution to the demand;
- Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

Project Impacts

In a commercial development, student generation can be estimated from indirect sources. The Los Angeles Unified School District (LAUSD) provides open enrollment at some schools, allowing students to attend schools other than their local school. Open enrollment is typically available at schools that are not otherwise operating to capacity. Because of this, parents have the option of enrolling children at schools in close proximity to their place of employment rather than the school that serves their residential location. As a result, the proposed Project could result in some indirect student generation from new employees working within the new Project building who enroll their children in schools within the service area, but who otherwise do not live in the area. The proposed Project would result in a net increase of 100,125 square feet of commercial floor area. As shown in **Table V.K3-2**, these units would generate approximately 3 elementary, 3 middle school, and 3 high school students.

**Table V.K3-2
 Estimated Student Generation**

Unit Type	Proposed No. of Units/Sq. Ft.	LAUSD Generation Factors*			Estimated Student Generation		
		Elementary School	Middle School	High School	Elementary School	Middle School	High School
Single-family 3+ Bedrooms	0	0.500	0.250	0.250	0	0	0
Multi-family 2-Bedrooms	0	0.250	0.100	0.100	0	0	0
Indirect Commercial Impact	100,125 sq. ft. (net)	See below**			3	3	3
Total					3	3	3

* Generation factors as provided in the City of Los Angeles Draft CEQA Thresholds Guide, May 14, 1998, Exhibit J.3-10, page J.3-54.

** Indirect student generation is calculated assuming one employee per 200 square feet of office space, for a total of 501 employees. Of these, 35% are estimated to have school age children. Of these, 5% are estimated to transfer their children to schools within the service area, for a total increase of 9 students. Assumes a reasonable distribution between elementary, middle, and high school students.

The actual number of students who will reside in the Project area and will attend the local LAUSD schools described above may vary for the following reasons:

- LAUSD allows parents the option of enrolling children at schools in close proximity to their place of employment rather than the school that serves their residential location.
- LAUSD provides open enrollment at some schools, allowing students to attend schools other than their local school. Open enrollment is typically available at schools that are not otherwise operating to capacity.
- The analysis does not take into account the potential for enrollment at private schools.

The first factor may cause the Project's actual demand for capacity at local LAUSD schools to be higher or lower than the estimates provided above and the other two factors may cause the Project's demand on these schools to be lower than the estimates. Overall, these projections are considered reasonable worst case estimates.

The addition of the proposed Project's nine students would be adequately accommodated by the existing capacity at the local schools. Therefore, the proposed Project would not result in a significant impact on local school capacity.

Mitigation Measures

As described above, the proposed Project would not result in a significant impact on public schools. Mitigation measures are not required or recommended

Significant Project Impacts after Mitigation

The proposed Project would not result in a significant adverse impact on schools.

Cumulative Impacts

General growth and specific development proposals in the area would contribute to a cumulative increase in the demand for education. Section IV provides a list of projects that are planned or under construction in the Project area. Most of the development planned for the area is commercial, providing additional square footage of office and retail space. However, the related projects list identifies some residential projects that would develop a total of 776 residential units (apartments, condominiums, and senior housing). Of these, 474 residential units would be served by the same public middle school (Emerson) as the proposed Project. No related project would be served by Westwood Elementary, Webster Middle School or Hamilton High School. As shown in **Table V.K3-3**, these units could generate up to 80 middle school students. However, with the addition of these students, Emerson Middle School would continue to operate below capacity. Some additional impacts could occur as a result of indirect impacts from the commercial related projects. The level of impact is difficult to assess without more detailed information about the related projects.

Based on this analysis, student generation from the proposed Project in combination with other planned development would not result in a significant cumulative impact on LAUSD schools serving the Project area. In addition, through the City's environmental review procedures, each new development is required to pay school impact fees in order to offset the additional demand for school capacity and services generated by the development. Payment of these fees would reduce cumulative impacts on these schools.

Table V.K3-3
Estimated Student Generation for Related Projects

Related Project	Proposed No. of Units	LAUSD Generation Factors Middle School¹	Estimated Student Generation at Emerson Middle School
<i>Palazzo Westwood</i> 1001 Tiverton Ave. Multi-family apartments	350	0.200 ²	70
<i>Weintraub Project</i> 10804 Wilshire Blvd. Multi-family condominiums	105	0.075 ³	8
<i>Flax</i> 10852 Lindbrook Ave. Multi-family condominiums	19	0.075 ³	2
Total			80
<p>Source: 1. Generation factors were obtained from the City of Los Angeles Draft CEQA Thresholds Guide, May 14, 1998, Exhibit J.3-10, page J.3-54.</p> <p>2. Exhibit J.3-10, multi family (rented), 3 or more bedrooms.</p> <p>3. Exhibit J.3-10, medium income area townhouse/condominium, 3 or more bedrooms.</p>			

4. Libraries

Existing Conditions

The Los Angeles Public Library provides library facilities and services for the City of Los Angeles. At present, no Los Angeles Public Library branch is located within the Century City community.

The Project area is currently served by two local branches of the public library within neighboring communities (see **Figure PS-1**). The West Los Angeles Regional Branch Library, located at 11360 Santa Monica Boulevard, is approximately 2.5 miles to the west of the proposed Project site. This branch is 13,740 square feet and can accommodate a population of up to 109,000 people.⁴⁸ The Robertson Branch, located at 1719 South Robertson Boulevard, is approximately 2.5 miles to the southeast of the Project site. In addition, library and research facilities at UCLA, located less than two miles from the site, are open to members of the public on a non-circulating basis.

In November of 1998, a Library Construction Bond was approved through Proposition DD. This bond provides funds for the purchase of property and the design and construction of a new 12,500 square-foot Westwood Branch Library. The planned location for this library is at Glendon Avenue and Wellworth Avenue, which is within 2.25 miles from the proposed Project site. According to the Los Angeles Public Library, construction of this facility is planned to begin in 2002.⁴⁹ According to the Los Angeles Public Library Branch Facilities Site Selection Criteria⁵⁰, a 12,500 square-foot library can accommodate a population of 50,000 to 100,000 people.

The Palms Rancho Park Branch, located at 2920 Overland Avenue, is currently under construction. Expected to be completed in October 2002, it will be approximately 2.5 miles to the south of the Project site. When completed, the 10,500 square foot facility could accommodate a population of 35,000 to 50,000 people.

Threshold of Significance

According to the City of Los Angeles Draft CEQA Thresholds Guide (1998, p. J.5-2), a finding of significance involving library services shall be made on a case by case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and
- Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the LAPL).

Project Impacts

Library needs are related to the size of the residential population, the geographic area served, and community characteristics. Projects that affect these factors (by increasing residential population in an area may increase demand for services from the public library. According to the City of Los Angeles Draft CEQA Thresholds Guide (City of Los Angeles, May 14, 1998, page J.5-1), projects that add fewer than 75 homes would not normally result in a significant impact on library services. The CEQA Thresholds Guide does not specify a threshold for commercial/office development.

⁴⁸ Source: City of Los Angeles Draft CEQA Thresholds Guide Tables J.5-1 and J.5-1.

⁴⁹ Construction schedules and facility square footages were obtained from the 1998 Library Bond Program October 2001 Progress Report prepared by the Los Angeles Public Library, Bureau of Engineering.

⁵⁰ Source: City of Los Angeles Draft CEQA Thresholds Guide, Page J.5-5, May 14, 1998.

The proposed Project consists of no new residential apartment units and a net increase of 100,125 square feet of development over existing uses. The Project's office space would contribute to the daytime employment level in the area, which could create some additional demand for local library service. However, this demand would be met by the existing and soon to be constructed facilities. Therefore, the Project's impact to library services would be less than significant.

Mitigation Measures

As described above, the proposed Project would not result in a significant impact on library services. Mitigation measures are not required or recommended.

Significant Project Impacts after Mitigation

The proposed Project would not result in a significant adverse impact on libraries.

Cumulative Impacts

General growth and specific development proposals in the Project area are expected to contribute to a cumulative increase in the demand for library facilities and services. Most of the development planned for the area is commercial, providing additional square footage of office and retail space. The related projects list identifies some residential projects that would develop a total of 776 residential units (apartments, condominiums, and senior housing). Also, daytime population would be added by commercial related projects (see **Table IV-1** in the Environmental Setting Section). However, the existing and under-construction libraries would be designed to accommodate a population up to 259,000 people. The Project's contribution to cumulative library impacts would be less than significant.

L. RECREATION AND PARKS

Existing Conditions

The Los Angeles Department of Recreation and Parks is responsible for the operation of public park and recreational facilities within the City of Los Angeles. **Figure R-1** identifies park locations within the Project vicinity.

The Project site currently provides both passive and active recreational opportunities.

Passive Recreational Facilities

Passive recreation and entertainment opportunities are provided by the Shubert Theater and Loews Cinemas, as well as within the plaza and pedestrian areas. The Shubert Theater is a 2,250 seat theater that was built in 1972. The Loews Cinema is a three-screen facility which provides 1,751 seats. The plaza provides shade, benches, landscaped areas, and occasional tenant related events such as fairs and holiday tree lighting ceremonies.

Active Recreational Facilities

On-site active recreational facilities are provided on eight roof-top tennis courts. The tennis courts are privately owned and operated. Membership varies during the course of the year, ranging from 90 to 250 members. Typical enrollment is 150 members. Members have priority; however, the general public may also access these facilities. Additionally, the courts are leased out to the Harvard-Westlake Middle School tennis teams during the school year and occasionally leased out for private events. In general, the tennis courts are underutilized and are frequently available.

Facilities located within a two mile radius of the Project site are considered to be within a reasonable walking or travel distance for the recreational users. As shown on **Figure R-1**, public neighborhood and community recreational facilities located within the Project area include the following:

1. **The Rancho Park Golf Course** is located at 10460 West Pico Boulevard. This facility includes an 18-hole and 9-hole/3 Par golf courses.
2. **Cheviot Hills Park & Recreation Center** encompasses 40-acres and is located at 2551 Motor Avenue. This full-service recreational center includes 14 lighted tennis courts, five baseball diamonds/soccer areas, two and one-half lighted basketball courts, an archery center, a petanque court (like bochi-ball), a swimming pool, and an amphitheater. The park area also contains picnic tables, a children's play area, and other open space amenities. Indoor facilities include a community building, concession stand, bathrooms, and indoor court activities.
3. The City of Los Angeles Recreation and Parks Department denotes **Irving Schachter Park**, located at 2599 Beverwill Drive, as a "pocket park". This small park consists of an open space area without recreational facilities.
4. **Palms Park** is a neighborhood park located at 2950 Overland Avenue. This 4.4-acre park contains bathrooms, picnic areas, barbecue facilities, hard courts, and a children's play area.
5. **Reynier Park** is a one-acre neighborhood park located at 2803 Reynier Avenue. Facilities at this park include a picnic area, hard courts, and a children's play area.
6. **Robertson Recreation Center** is a small center located at 1641 Preuss Road. Outdoor activities include a hardball court, children's play area, and picnic area. An indoor gymnasium building (not a standard full size) is also available on-site.
7. **Holmby Park** is an 8.5-acre facility that includes a children's play area, a picnic area with barbecue facilities, and lawn areas with walking paths. Located at 601 Club Drive on the east side of Beverly Glen.

Figure R-1 Public Recreation

8. **Westwood Recreational Center** is a full-service recreation center spread over a 26-acre site. Indoor amenities include two indoor basketball gyms, two indoor racquetball courts, two community classrooms, vending machines, and bathroom facilities. Outdoor facilities include eight tennis courts large play fields, picnic and barbecue areas. The City is in the process of redesigning the children's play area that will implement a "boundless play system". Phase 1 of the children's play area opened in late 2001 with Phase II to be constructed in 2002, pending grant monies.

Additional park facilities located in the City of Beverly Hills within two miles of the Project site include Roxbury Recreation Center, Oakhurst Park, and La Cienega Park.

Threshold of Significance

Public park needs are related to the size of the residential population, the geographic area served, and community characteristics. Projects that affect these factors (by increasing residential population in an area) may increase demand for public park facilities.⁵¹ As a screening criteria the City of Los Angeles' Draft CEQA Thresholds Guide states that, projects that add fewer than 50 homes would not normally result in a significant impact on park services.

The proposed Project would result in a significant impact if it generates a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services.

Project Impacts

The existing uses on-site are commercial in nature, consisting of office, restaurant, theaters, retail and health club. The Project would replace the existing uses with office, restaurant, retail, a cultural facility, and a landscaped outdoor plaza. The cultural and improved plaza uses would provide recreational value at the site. The proposed Project does not include any residential uses, which would require the construction of new recreational facilities. As the Project would not increase the resident population, no adverse impacts are anticipated.

The removal of the eight privately-owned tennis courts would result in some members and/or private lessees seeking court reservations elsewhere. The two nearest public court facilities, located at Cheviot Hills and the Westwood Recreational Center, provide 22 tennis courts. Given the underutilization of the existing facility, and number of nearby tennis courts, and/or recreational opportunities, Project implementation would not result in a substantial deterioration of another existing recreational facility due to increased usage from displaced tennis players.

While the City of Los Angeles' Draft CEQA Thresholds Guide does not specifically mention theaters and cinemas as passive recreational facilities, they do provide opportunities for passive recreation. The Shubert Theatre is one of many theater venues in Los Angeles.⁵² The site is in close proximity to Hollywood and other theater venues in the Los Angeles area. Other large theaters in the area include the Pantages Theater, Kodak Theater, Dorothy Chandler Pavilion, and the Ahmanson Theater. The Shubert Theater is currently underutilized. Due to underutilization of the theater and the number of similar venues in the area, removal of the theater would not result in an adverse impact on recreational facilities.

The Loews Theatres Century Plaza Cinemas are one of the many cinema venues on the west-side of Los Angeles. They have experienced direct competition with the AMC Century 14 facility located in the Century City shopping mall to the west. Additionally, three other movie facilities are located within

⁵¹ City of Los Angeles Draft CEQA Thresholds Guide, 1998, p. J.4-3.

⁵² The Los Angeles Times Funbook 2001 identifies 54 theaters in Los Angeles County. www.at-la.com identifies 88 theaters in Los Angeles County. Yahoo yellow pages identifies 65 theaters.

1.3 miles of the subject property. The loss of cinemas is not anticipated to generate an adverse impact to recreational facilities due to the number of movie screens available in the vicinity.

Mitigation Measures

Based on stated thresholds of significance, no significant impacts to recreational opportunities or facilities would occur. Therefore, no mitigation measures are required or recommended.

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

General growth and specific development proposals in the area would contribute to a cumulative increase in the demand for recreational facilities. The Environmental Setting Section (Section IV) provides a list of projects that are planned or are under construction in the project area. Most of the development planned for the area is commercial, providing additional square footage of office and retail space. The related project list identifies some residential projects that would develop a total of 776 residential units (apartments, condominiums, and senior housing).

An increase in the population within the Project area would result in a proportional increase in the demand for recreational facilities. This would marginally affect the existing public recreational facilities in the area. However, through the City's Quimby Act and environmental review procedures, each new development is required to provide recreational land or facilities, pay in-lieu park fees, or otherwise mitigate their potential impacts. Therefore cumulative impacts are less than significant.

M. TRANSPORTATION/TRAFFIC

This section is based upon the Traffic Impact Study for the Project prepared by Crain & Associates, dated June 2002 (**Appendix 18**). A summary of the analysis is provided below.

Existing Conditions

The proposed Project is located in the western portion of the City of Los Angeles. The surrounding area is a mixture of commercial, residential, studio and recreational uses. The streets and highways in this area serve many high activity centers, resulting in high traffic volumes within and through the area. Access to the Project is expected to be provided mostly by the San Diego Freeway, Santa Monica Freeway, and the surface streets and highways discussed below. **Figure T-1** shows the local roadway network as well as identifies intersections studied in the Project traffic analysis.

Six roadways comprise the Century City North street network. Those are Santa Monica Boulevard, Olympic Boulevard, Constellation Boulevard, Century Park West, Avenue of the Stars and Century Park East which are described below. Other major thoroughfares in the area are Wilshire Boulevard, Sepulveda Boulevard, Beverly Glen Boulevard, Westwood Boulevard, and Pico Boulevard.

Streets and Highways

Located approximately 2 miles west of the Project, the San Diego Freeway (I-405) extends from the northern part of the San Fernando Valley, through Los Angeles County and into Orange County. It generally provides four lanes in each direction and includes high-occupancy vehicle (HOV) lanes for much of its route. In the study area, the I-405 runs north-south, interchanges with the Santa Monica Freeway, and has full or partial ramp connections at Sunset Boulevard, Wilshire Boulevard, Santa Monica Boulevard, Olympic/Pico Boulevards, and National Boulevard.

The Santa Monica Freeway (I-10) is approximately two miles south of the site. It runs east-west from the City of Santa Monica, through Downtown Los Angeles, and continues easterly as the San Bernardino Freeway. In the vicinity of the study area, it generally has four lanes in each direction, and no HOV lanes. It interchanges with I-405, and has full or partial ramp connections at Overland Avenue, National Boulevard/Manning Avenue and Robertson Boulevard.

Santa Monica Boulevard is a State highway (SR-2) and a divided major highway, handling high volumes of traffic, including buses. It consists of two two-way roadways separated by a median strip. These two roadways run east/west, with the north roadway being the more major of the two roadways. Santa Monica Boulevard North provides up to three lanes in each direction. Santa Monica Boulevard South varies from one to three lanes in each direction.

Olympic Boulevard is an east/west major highway located to the south of the subject property. It provides three lanes in the eastbound direction and four lanes westbound near the site. Olympic Boulevard has left-turn channelization at all intersections. At Avenue of the Stars, it is grade-separated, connecting to Avenue of the Stars via cloverleaf type ramps.

Pico Boulevard, a major highway, provides up to three lanes both eastbound and westbound. Left-turn channelization is available at most intersections.

Wilshire Boulevard is an east-west major highway and also a significant public transportation route. It is to the north of the Project site and has three to four lanes in each direction and left-turn channelization.

Constellation Boulevard is a two-block long, east/west secondary highway which runs through the middle of the Century City North Specific Plan. It provides three lanes in each direction. Constellation Boulevard runs along the northern boundary of the Project site.

Figure T-1 Traffic Study Intersections

Overland Avenue is a major highway from Pico Boulevard southerly and provides a direct connection to the I-10. It has two lanes plus left-turn channelization in each direction. North of Pico Boulevard, it becomes a two-lane local street, terminating at Santa Monica Boulevard.

Beverly Glen Boulevard is a north-south major highway extending from the San Fernando Valley, across the Santa Monica Mountains, and terminates at Pico Boulevard. It provides two lanes in each direction and left-turn channelization.

Century Park West is a secondary highway running north-south between Santa Monica Boulevard South and Olympic Boulevard. This short street segment has two or three through lanes in each direction and is located to the west of the subject property.

Avenue of the Stars is a north-south divided major highway and the central roadway through the Century City area. Avenue of the Stars has a median that varies in width and three through lanes on either side. The Project site fronts the 2000 block of Avenue of the Stars.

Century Park East is a north-south secondary highway which provides three lanes in both directions plus left-turn channelization. It extends the length of Century City along the east side. The eastern portion of the Project site block fronts on Century Park East.

Motor Avenue is designated a collector street from Pico Boulevard to Manning Avenue, and a secondary Highway south of Manning Avenue. This variable width roadway is striped with two lanes in each direction between Pico Boulevard and Monte Mar Drive and one lane in each direction thereafter to Manning Avenue.

Other streets or their intersections expected to be involved with Project access include:

- Sunset Boulevard: East-west modified major highway.
- Galaxy Way: East-west collector street in south Century City.
- Empyrean Way: East-west collector street in south Century City.
- Manning Avenue: East-west collector street west of Motor Avenue and secondary highway to the east.
- Sawtelle Boulevard: North-south collector street north of Olympic Boulevard and secondary highway to the south.
- Beloit Avenue: North-south collector street.
- Cotner Avenue: North-south collector street.
- Patricia Avenue: North-south local street north of Pico Boulevard and collector street to the south.
- Spalding Drive: North-south local street in the City of Beverly Hills.

Public Transit

Century City and the immediate Project vicinity are served by a number of public transit operators. These include the Los Angeles County Metropolitan Transportation Authority (MTA), Santa Monica Municipal Bus Lines (SMMBL) and Culver CityBus, which generally provide local bus service, and the Los Angeles Department of Transportation (LADOT), Santa Clarita Transit and Antelope Valley Transit, which provide express bus services. Most of the bus routes that access Century City allow for stops at a minimum of one of three Project site-adjacent intersections: 1) Constellation Boulevard and Avenue of the Stars, 2) Constellation Boulevard and Century Park East, and/or 3) Olympic Boulevard and Century Park East. Together, the bus routes described below render the Project accessible from the surrounding areas of Santa Monica, Brentwood, Westwood, Beverly Hills, Rancho

Park, Culver City, Palms, Fox Hills, Downtown Los Angeles, Encino, Santa Clarita, Lancaster and Palmdale. When transfer opportunities are considered, much of the Los Angeles Metropolitan area is connected to the Project via public transit. Bus routes serving Century City and the Project vicinity are summarized in Appendix 18.

Existing Traffic Volumes

Traffic volume data was obtained from manual traffic counts conducted in 2000, 2001 and 2002, with the majority of them being done in 2001, the selected base year of the traffic study. Where 2000 counts were used, they were growth-factored by 1.5 percent to reflect existing conditions for 2001. Counts taken in 2002 were not adjusted. **Figures T-2 and T-3** depict the existing (2001) AM and PM peak-hour traffic volumes at the thirty-eight study intersections.

Detailed traffic analyses of existing traffic conditions were performed at thirty-eight study intersections. These traffic analyses were performed through the use of established traffic engineering techniques for the critical peak periods. The new traffic counts described earlier were utilized to reflect any recent changes in traffic demand patterns. Other data pertaining to intersection widths and geometrics, bus stop locations, on-street parking restrictions, and traffic signal operations were obtained from field checks. The thirty-eight intersections analyzed are as follows:

1. Sunset Boulevard and Beverly Glen Boulevard (E)
2. Sunset Boulevard and Beverly Glen Boulevard (W)
3. Wilshire Boulevard and Beverly Glen Boulevard
4. Santa Monica Boulevard (N) and Overland Avenue
5. Santa Monica Boulevard (S) and Overland Avenue
6. Santa Monica Boulevard (N) and Beverly Glen Boulevard
7. Santa Monica Boulevard (S) and Beverly Glen Boulevard
8. Santa Monica Boulevard (S) and Century Park West
9. Santa Monica Boulevard (N) and Club View Drive
10. Santa Monica Boulevard (N) and Avenue of the Stars
11. Santa Monica Boulevard (S) and Avenue of the Stars
12. Santa Monica Boulevard (N) and Century Park East
13. Santa Monica Boulevard (S) and Century Park East
14. Santa Monica Boulevard (N) and Wilshire Boulevard
15. Santa Monica Boulevard (S) and Wilshire Boulevard
16. Constellation Boulevard and Century Park West
17. Constellation Boulevard and Avenue of the Stars
18. Constellation Boulevard and Century Park East
19. Olympic Boulevard and Overland Avenue
20. Olympic Boulevard and Beverly Glen Boulevard
21. Olympic Boulevard and Century Park West
22. Olympic Boulevard Westbound Ramps and Avenue of the Stars
23. Olympic Boulevard Eastbound Ramps and Avenue of the Stars
24. Olympic Boulevard and Century Park East
25. Olympic Boulevard and Spalding Drive
26. Galaxy Way and Avenue of the Stars
27. Empyrean Way and Avenue of the Stars

Figure T-2 Existing (2001) Traffic Volumes-AM Peak Hour

Figure T-3 Existing (2001) Traffic Volumes-PM Peak Hour

28. Pico Boulevard and Overland Avenue
29. Pico Boulevard and Patricia Avenue
30. Pico Boulevard and Beverly Glen Boulevard
31. Pico Boulevard and Motor Avenue
32. Pico Boulevard and Avenue of the Stars
33. Pico Boulevard and Century Park East
34. Manning Avenue and Motor Avenue
35. Santa Monica Boulevard and 405 Freeway Southbound Ramps/Beloit Avenue
36. Santa Monica Boulevard and 405 Freeway Northbound Ramps/Cotner Avenue
37. 405 Freeway SB Off-Ramp/Tennessee Avenue and Sawtelle Boulevard
38. 405 Freeway NB On-Ramp/Tennessee Avenue and Cotner Avenue

These intersections, which were selected in consultation with the Los Angeles Department of Transportation, are the intersections which could be most affected by additional traffic generated by the Project. The last four intersections were included to address potential impacts involving San Diego Freeway ramps likely to be used by Project traffic. All of these are signalized intersections except for Empyrean Way and Avenue of the Stars (no. 27), and 405 Freeway Northbound On-Ramp/Tennessee Avenue and Cotner Avenue (no. 38).

Level of Service Methodology

The methodology used for the analysis and evaluation of traffic operations at each study intersection is based on procedures outlined in the Transportation Research Board Circular 212,⁵³ Interim Materials on Highway Capacity. In the discussion of the Critical Movement Analysis (CMA) for signalized intersections, procedures were developed for determining operating characteristics of an intersection in terms of the "Level of Service" (LOS) provided for different levels of traffic volume and other variables, such as the number of traffic signal phases. Level of Service describes the quality of traffic flow. Levels of Service A to C denote conditions in which traffic operations are proceeding quite well, with no interruptions in traffic flow due to traffic volumes. Level D, a more constrained condition, is the level for which a metropolitan area street system is typically designed. Level E represents volumes at or near roadway capacity, which will result in possible stoppages of momentary duration and occasional unstable flow. Level F is a forced-flow condition, occurring when a facility is overloaded and vehicles experience stop-and-go traffic with delays of long duration.

A determination of the LOS at a signalized intersection, where traffic volumes are known or have been projected, can be obtained through a summation of the critical movement volumes at that intersection. Once the sum of critical movement volumes has been obtained, the values indicated in **Table V.M-1** can be used to determine the applicable LOS.

⁵³ Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington D.C. , 1980

Table V.M-1^(a)
Critical Movement Volume Ranges
For Determining Levels of Service

Level of Service	Maximum Sum of Critical Volumes (VPH)		
	Two Phase ^(b)	Three Phase ^(b)	Four or More Phases ^(b)
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	-----Not Applicable-----		

^(a) For planning applications only, i.e., not appropriate for operations and design applications.
^(b) "Phasing" refers to the signal phasing for the signal at the subject intersection and whether the signal has two, three or four or more phases in its operation

Capacity is defined herein to represent the maximum total hourly movement volume which has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. For planning purposes, capacity equates to the maximum value of Level of Service E, as indicated in Table V.M-2. The Critical Movement Analysis (CMA) indices used in this study were calculated by dividing the sum of critical movement volumes by the appropriate capacity value for the type of signal control present or proposed at the study intersections. Thus, the Level of Service corresponding to a range of CMA values is shown in Table V.M-2.

Table V.M-2
Level of Service
As a Function of CMA Values

Level of Service	Description of Operating Characteristics	Range of CMA Values
A	Uncongested operations; all vehicles clear in a single cycle.	< 0.60
B	Same as above.	>0.60 < 0.70
C	Light congestion; occasional backups on critical approaches.	>0.70 < 0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	>0.80 < 0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	>0.90 < 1.00
F	Forced flow with stoppages of long duration.	> 1.00

Existing Intersection Levels of Service

By applying this analysis procedure to the study intersections, the Critical Movement Analysis (CMA) values and the corresponding Levels of Service for existing traffic conditions were determined. The Existing (2001) condition results of the Critical Movement Analysis for the study intersections are shown in **Table V.M-3**. These results indicate that the study intersections are operating at Levels of Service ranging from A to F, with 12 intersections at LOS E or F in one or both peak hours.

Table V.M-3
Existing (2001) Conditions
Critical Movement Analysis (CMA) and Level of Service (LOS) Summary

Intersection		Peak Hour	CMA	LOS
1.	Sunset Blvd. & Beverly Glen Blvd. (E)	AM	0.894	D
		PM	1.023	F
2.	Sunset Blvd. & Beverly Glen Blvd. (W)	AM	1.189	F
		PM	1.062	F
3.	Wilshire Blvd. & Beverly Glen Blvd.	AM	0.868	D
		PM	0.884	D
4.	Santa Monica Blvd. (N) & Overland Ave.	AM	0.861	D
		PM	0.814	D
5.	Santa Monica Blvd. (S) & Overland Ave.	AM	0.478	A
		PM	0.428	A
6.	Santa Monica Blvd. (N) & Beverly Glen Blvd.	AM	0.849	D
		PM	0.823	D
7.	Santa Monica Blvd. (S) & Beverly Glen Blvd.	AM	0.849	D
		PM	0.884	D
8.	Santa Monica Blvd. (S) & Century Park West	AM	0.325	A
		PM	0.397	A
9.	Santa Monica Blvd. (N) & Club View Dr.	AM	0.613	B
		PM	0.707	C
10.	Santa Monica Blvd. (N) & Ave. of the Stars	AM	0.825	D
		PM	0.755	C
11.	Santa Monica Blvd. (S) & Ave. of the Stars	AM	0.506	A
		PM	0.544	A
12.	Santa Monica Blvd. (N) & Century Park East	AM	0.759	C
		PM	0.666	B

Table V.M-3 (Cont.)
Existing (2001) Conditions
Critical Movement Analysis (CMA) and Level of Service (LOS) Summary

Intersection		Peak Hour	CMA	LOS
13.	Santa Monica Blvd. (S) & Century Park East	AM	0.771	C
		PM	0.648	B
14.	Santa Monica Blvd. (N) & Wilshire Blvd.	AM	1.096	F
		PM	1.046	F
15.	Santa Monica Blvd. (S) & Wilshire Blvd.	AM	1.144	F
		PM	0.977	E
16.	Constellation Blvd. & Century Park West	AM	0.265	A
		PM	0.260	A
17.	Constellation Blvd. & Ave. of the Stars	AM	0.646	B
		PM	0.537	A
18.	Constellation Blvd. & Century Park East	AM	0.362	A
		PM	0.557	A
19.	Olympic Blvd. & Overland Ave.	AM	1.176	F
		PM	1.141	F
20.	Olympic Blvd. & Beverly Glen Blvd.	AM	0.820	D
		PM	0.851	D
21.	Olympic Blvd. & Century Park West	AM	0.917	E
		PM	0.966	E
22.	Olympic Blvd. WB Ramps & Ave. of the Stars	AM	0.461	A
		PM	0.415	A
23.	Olympic Blvd. EB Ramps & Ave. of the Stars	AM	0.379	A
		PM	0.388	A
24.	Olympic Blvd. & Century Park East	AM	0.861	D
		PM	0.829	D
25.	Olympic Blvd. & Spalding Dr.	AM	0.983	E
		PM	0.865	D
26.	Galaxy Wy. & Ave. of the Stars	AM	0.381	A
		PM	0.427	A
27.	Empyrean Wy. & Ave. of the Stars	AM	0.477	A
		PM	0.419	A

Table V.M-3 (Cont.)
Existing (2001) Conditions
Critical Movement Analysis (CMA) and Level of Service (LOS) Summary

Intersection		Peak Hour	CMA	LOS
28.	Pico Blvd. & Overland Ave.	AM	0.894	D
		PM	1.234	F
29.	Pico Blvd. & Patricia Ave.	AM	0.729	C
		PM	0.649	B
30.	Pico Blvd. & Beverly Glen Blvd.	AM	0.603	B
		PM	0.635	B
31.	Pico Blvd. & Motor Ave.	AM	0.934	E
		PM	0.983	E
32.	Pico Blvd. & Ave. of the Stars	AM	0.837	D
		PM	0.967	E
33.	Pico Blvd. & Century Park East	AM	0.732	C
		PM	0.806	D
34.	Manning Ave. & Motor Ave.	AM	0.877	D
		PM	0.843	D
35.	Santa Monica Blvd. & 405 Fwy. SB Ramps/Beloit Ave.	AM	0.768	C
		PM	0.658	B
36.	Santa Monica Blvd. & 405 Fwy. NB Ramps/Cotner Ave.	AM	0.830	D
		PM	0.814	D
37.	405 Fwy. SB Off-Ramp/ Tennessee Ave. & Sawtelle Blvd.	AM	0.537	A
		PM	0.803	D
38.	405 Fwy. NB On Ramp/ Tennessee Ave. & Cotner Ave.	AM	0.932	E
		PM	1.072	F

Existing Project Site Trip Generation

The vehicular trip generation of projects in the Century City area is typically analyzed according to three methodologies. These methodologies and the associated trip generation rates are contained or referenced in the Century City North Specific Plan (CCNSP), West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP), and LADOT Traffic Study Policies and Procedures manual. In addition, LADOT has required a fourth methodology to analyze project impacts to provide a more conservative analysis. This is the methodology utilized to determine Project traffic impacts. The trip rates used in the traffic analysis for the existing uses and the proposed Project have been reviewed and approved by LADOT.

The subject property is currently developed with a variety of uses. These uses include office, live theater (Shubert Theater), movie theater (Loew's Cineplex), restaurant, retail and health club.

Traffic generation rates for the Project land-use components are specified in the Century City North Specific Plan (CCNSP). This plan contains trip rates, which are to be used when evaluating a project or a change in land use in the Century City area. Under the CCNSP, daily trip rates pertaining to Cumulative Automobile Trip Generation Potential (CATGP) are to be applied against the FAR area. As shown in **Table V.M-4**, the existing uses generate 19,161 daily trips.

Traffic generation rates for the Project land-use components are also specified in the current West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP) Ordinance Number 171,492, which became effective March 8, 1997 as administered by the City of Los Angeles Department of Transportation (LADOT). The WLA TIMP focuses on the PM peak hour and provides PM peak hour trip rates for the office, theater, restaurant, retail and health club uses of the site. No daily and AM peak hour trip rates are contained in the WLA TIMP. According to the WLA TIMP, the existing uses generate 3,355 PM peak hour trips (see **Table V.M-5**).

Standard LADOT Methodology requires the use of the most current Trip Generation handbook (6th edition), published by the Institute of Transportation Engineers (ITE), unless the project is within a Transportation Specific Plan area. The existing use trip generation pursuant to the Standard LADOT Methodology is set forth in **Table V.M-6**.

To provide a more conservative analysis than under its Standard Methodology, LADOT has required a Revised Methodology that incorporates adjustments for internal trip-making (i.e., trips made between uses on the same site without requiring use of the surrounding streets). This “capture” of trips internal to the site has the net effect of reducing the trips generated between the development and the external street system. A LADOT recommended internal trip reduction percentage of 50% was applied to the following proposed and existing uses: High-Turnover Restaurant, Quality Restaurant, Retail, and Health Club

Under this conservative approach, the estimated trip generations for existing uses were determined and are shown in **Table V.M-7**.

Table V.M-4
Existing Trip Generation
Per Century City North Specific Plan (CCNSP)

Land Uses	FAR Area	Gross Floor Area	Per CCNSP Daily Trip		
			Rate/1,000 sf FAR	Daily Trips	
Existing Uses					
Office	287,701 sf	332,856	gsf	14	4,028
Movie Theater	39,695 sf	43,056	gsf	35	1,389
Live Theater	108,786 sf	119,554	gsf	35	3,808
High-Turnover Restaurant	108,292 sf	117,212	gsf	45	4,873
Quality Restaurant	36,098 sf	39,071	gsf	45	1,624
Retail	57,316 sf	61,970	gsf	35	2,006
Health Club	40,934 sf	44,277	gsf	35	1,433
Existing Total	678,822 sf	757,996	gsf		19,161

Source: Crain and Associates, 2002.

Table V.M-5
Existing Use Trip Generation Analysis
West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP)

Land Uses	Gross Floor Area	PM Peak Hour	
		Inbound	Outbound
Office	332,856 gsf	77	383
Movie Theater	43,056 gsf	158	105
	1,751 st		
Live Theater	119,554 gsf	23	22
	2,250 st		
High-Turnover Restaurant	117,212 gsf	908	606
Quality Restaurant	39,071 gsf	193	95
Retail	61,970 gsf	286	309
Health Club	44,277 gsf	116	74
Existing Total	757,996 gsf	1,761	1,594
			3,355

Table V.M-6
Existing Use Trip Generation Analysis
Standard LADOT Methodology

Existing Uses	Size	Daily	AM Peak Hour		PM Peak Hour	
			I/B	O/B	I/B	O/B
Office	332,856 gsf	3,342	428	58	77	383
Movie Theater	43,056 gsf					
	1,751 st	3,152	18	0	158	105
Shubert Theater	119,554 gsf					
	2,250 st	2,550	23	0	23	22
High-Turnover Restaurant	117,212 gsf	15,277	565	522	908	606
Quality Restaurant	39,071 gsf	3,514	26	6	193	95
Retail	61,970	2,660	39	25	286	309
Health Club	44,277 gsf	1,328	6	7	116	74
Subtotals	757,996 gsf	31,823	1,105	618	1,761	1,594
			1,723		3,355	

Table V.M-7
Existing Use Trip Generation Analysis
Revised LADOT Methodology

Existing Uses	Size	Daily	AM Peak Hour		PM Peak Hour	
			I/B	O/B	I/B	O/B
Office	332,856 gsf	3,342	428	58	77	383
Movie Theater	43,056 gsf					
	1,751 st	3,152	18	0	158	105
Shubert Theater	119,554 gsf					
	2,250 st	2,550	23	0	23	22
High-Turnover Restaurant	117,212 gsf	15,277	565	522	908	606
Quality Restaurant	39,071 gsf	3,514	26	6	193	95
Retail	61,970	2,660	39	25	286	309
Health Club	44,277 gsf	1,328	6	7	116	74
Subtotals	757,996 gsf	31,823	1,105	618	1,761	1,594
			1,723		3,355	
<i>Less Internal Trip Adjustments</i>						
High-Turnover Restaurant	50%	-7,639	-283	-261	-454	-303
Quality Restaurant	50%	-1,757	-13	-3	-97	-48
Retail	50%	-1,330	-20	-13	-143	-155
Health Club	50%	-664	-3	-4	-58	-37
Total Internal Reductions		-11,390	-319	-281	-752	-543
			-600		-1,295	
Net Existing Trips		20,433	786	337	1,009	1,051
			1,123		2,060	

Threshold of Significance

WLA TIMP Intersection Thresholds

In the WLA TIMP Ordinance, LADOT defines a “significant transportation impact” at intersection locations based on relative increases in the intersection CMA values due to project and project-related traffic. The definition uses a “sliding scale” to evaluate impacts, allowing for greater increases in traffic at locations with more available (unused) capacity than at those intersections experiencing near or at capacity conditions. The LADOT significant impact criteria is shown below in **Table V.M-8**.

Table V.M-8
LADOT Significant Impact Criteria

Final CMA (V/C)	Level of Service	Project-Related Increase in CMA
0.701 - 0.800	C	equal to or greater than 0.040
>0.801 - 0.900	D	equal to or greater than 0.020
> 0.901	E, F	equal to or greater than 0.010

Project Impacts

Construction Phase

Construction of the Project will require demolition of the two existing buildings, and construction of the new building. The existing subterranean parking garage on the Project site will be retained with some modifications. Traffic during construction activities would be generated by activities including construction equipment, crew vehicles, haul trucks and trucks delivering building materials. Hauling of debris would be restricted to a haul route approved by the City.

The City of Los Angeles will approve specific haul routes for the transport of materials to and from the site during demolition and construction. Currently, the Project's haul route is not approved and is subject to the City's approval process. This process includes a public hearing and opportunities for the public to comment on the proposed route. Subject to approval, the general haul routes currently envisioned are as follows:

- **Inbound:** Approaching from the north, south, east or west, vehicles would travel the 10 Freeway and exit at Overland Boulevard. Proceed north to Pico Boulevard, east on Pico Boulevard to Avenue of the Stars, and north to the Project site.
- **Outbound:** From the site, vehicles would proceed east on Constellation Boulevard to Century Park East. South on Century Park East to Pico Boulevard. West on Pico Boulevard to Overland Avenue, and South on Overland Avenue to the 10 Freeway.

A goal of the Project is to reuse and/or recycle as much of the existing structure as possible. Materials that would be recycled include concrete and steel. Concrete from the site would be hauled via the Santa Monica (I-10) Freeway to recycling sites located to the east. Steel would be hauled via the San Diego (I-405) Freeway or Harbor Freeway (I-110) to recycling sites located to the south. The recycling component of the Project is a major design feature. It is anticipated that about 50 to 80 percent of all materials (by weight) would be recycled.

Removal of these materials during the demolition phase is expected to take approximately 5 months and will require approximately 41 roundtrip truckloads (or 82 directional daily trips, counting the arrival and departure of each truck separately). Work hours are anticipated to be from 7:00 a.m. to 5:30 p.m. Monday through Friday and 10:00 a.m. to 6:00 p.m. on Saturday. During the construction phase, all trips generated by the existing uses would be replaced by fewer trips comprised of commuting construction personnel and haul trucks. Additionally, the Project would be subject to the City's haul route approval process. See **Figure T-10** for a map of the proposed haul routes. Ingress and egress from the site would be designed pursuant to City code requirements. Nevertheless, it will be necessary to develop and implement a construction traffic control plan, including the designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction.

Project Traffic Generation

The Project proposes to redevelop the subject property with a variety of uses, which include office, restaurant, retail and cultural. Projections of the amount of Project traffic expected to be generated were also calculated according to the CCNSP. The proposed Project would generate 12,450 daily Trips (**Table V.M-9**). Additionally, the proposed Project's traffic generation was compared to the amount of traffic being generated by the current development on the Project site (19,161 daily trips). Therefore, the proposed Project would result in a net decrease of 6,711 daily Trips. These existing trips will be removed from the area roadway system as a result of the removal of the existing site uses prior to construction of the 2000 Avenue of the Stars Project.

Projections of the amount of project traffic expected to be generated were calculated according to the WLA TIMP. The proposed Project would generate 1,418 PM trips (Table V.M-10). Additionally, the proposed Project's traffic generation was compared to the amount of traffic being generated by the current development on the Project site (3,355 PM trips). Therefore, the proposed Project would result in a net decrease of 1,937 PM trips. These existing trips will be removed from the area roadway system as a result of the removal of the existing site uses prior to construction of the 2000 Avenue of the Stars Project.

Trips generated by the proposed Project were also analyzed according to Standard LADOT Methodology. The AM peak-hour and daily trip generations were calculated using ITE formulas and rates. As shown in Table V.M-11, utilizing this approach, the Project would generate 11,253 daily trips, 1,135 AM peak hour trips and 1,418 PM peak hour trips. When compared to the amount of traffic being generated by the current development on the project site, the proposed Project results in a net decrease of 20,570 daily trips, 588 AM peak hour trips and 1,937 PM peak hour trips. These existing trips will be removed from the area roadway system as a result of the removal of the existing site uses prior to construction of the 2000 Avenue of the Stars Project.

Trips generated by the proposed Project were analyzed utilizing the Revised LADOT Methodology, which considers the effect of "internal capture" of trips made between uses on the site. Utilizing this approach, the proposed Project would generate 9,076 daily trips, 1,043 AM trips and 1,161 PM trips (See Table V.M-12). The existing uses of the site would be removed in order to allow for development of the proposed Project. When compared to the existing trip generation, the proposed Project results in a net decrease of 11,357 daily trips, 80 AM peak-hour trips and 899 PM peak-hour trips (See Table V.M-12).

Table V.M-9
Project Trip Generation
Per Century City North Specific Plan (CCNSP)

Land Uses	FAR Area	Gross Floor Area	Per CCNSP Daily Trip	
			Rate/1,000 sf FAR	Daily Trips
Proposed Uses				
Office	719,924 sf	763,900 gsf	14	10,079
High-Turnover Restaurant	15,264 sf	16,012 gsf	45	687
Quality Restaurant	15,263 sf	16,011 gsf	45	687
Retail	18,318 sf	19,214 gsf	35	641
Cultural Use	10,178 sf	10,675 gsf	35	356
Proposed Totals	778,947 sf	815,201 gsf		12,450
Existing Total	678,822 sf	757,996 gsf		19,161
Net Project Total				-6,711

Source: Crain and Associates, 2002.

Table V.M-10
Project Trip Generation Analysis
West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP)

Land Uses	Gross Floor Area	PM Peak Hour	
		Inbound	Outbound
Office	763,900 gsf	145	688
High-Turnover Restaurant	16,012 gsf	124	83
Quality Restaurant	16,011 gsf	79	39
Retail	19,214 gsf	89	96
Cultural	10,675 gsf	36	39
Proposed Total	825,812 gsf	473	945
			1,418
Existing Total	757,996 gsf	1,761	1,594
			3,355
Net Project Total		-1,288	-649
			-1,937

Table V.M-11
Project Trip Generation Analysis
Standard LADOT Methodology

Proposed Uses			AM Peak Hour		PM Peak Hour	
	Size	Daily	I/B	O/B	I/B	O/B
Office	763,900	6,325	830	113	145	688
High-Turnover Restaurant	16,012 gsf	2,087	77	71	124	83
Quality Restaurant	16,011 gsf	1,440	11	2	79	39
Retail	19,214 gsf	825	12	8	89	96
Cultural	10,675 gsf	576	8	3	36	39
Subtotal	825,812 gsf	11,253	938	197	473	945
				1,135		1,418
Net Existing Total		31,823	1,105	618	1,761	1,594
				17,023		3,355
Net Project Trips		-20,570	-167	-421	-1,288	-649
				-588		-1937

Table V.M-12
2000 Avenue of the Stars
Project Trip Generation Analysis
Revised LADOT Methodology

Proposed Uses			AM Peak Hour		PM Peak Hour	
	Size	Daily	I/B	O/B	I/B	O/B
Office	763,900	6,325	830	113	145	688
High-Turnover Restaurant	16,012 gsf	2,087	77	71	124	83
Quality Restaurant	16,011 gsf	1,440	11	2	79	39
Retail	19,214 gsf	825	12	8	89	96
Cultural	10,675 gsf	576	8	3	36	39
Subtotal	825,812 gsf	11,253	938	197	473	945
			1,135		1,418	
<i>Less Internal Trip Adjustments</i>						
High-Turnover Restaurant	50%	-1,044	-39	-36	-62	-42
Quality Restaurant	50%	-720	-6	-1	-40	-20
Retail	50%	-413	-6	-4	-45	-48
Net Internal Reductions		-2,177	-51	-41	-147	-110
			-92		-257	
Net Proposed Total		9,076	877	156	326	835
			1,043		1,161	
Net Existing Total		20,433	786	337	1,009	1,051
			1,123		2,060	
Net Project Trips		-11,357	101	-181	-683	-216
			-80		-899	

Trip Distribution

Determination of the geographic distribution of generated trips is the next step in the study process. Project generated traffic was assigned to the local roadway system based on a trip distribution pattern estimated by Crain & Associates in conjunction with LADOT staff. The trip distribution for the Project was determined by considering the proposed land use, existing traffic movements, characteristics of the surrounding roadway system, nearby regional population and employment centers, geographic location of the Project site and its proximity to freeways, major travel routes, and the residential communities and areas from which the great majority of employees and patrons would likely be attracted. Based on these factors and a review of traffic patterns in the area, the regional trip distributions shown below were estimated for the Project. Approximately 60 percent were estimated as using surface streets for primary site access, with the remaining 40 percent using the San Diego Freeway (23 percent) and Santa Monica Freeway (17 percent) for primary site access.

The directional trip distribution for the Project was estimated as North: 25%, South: 20%, East: 37%, West: 18%. This distribution pattern was also assumed applicable to the existing development.

Trip Assignment

The assignment of Project trips was accomplished in two steps. The number of trips associated with each direction was first calculated using the distribution percentages shown above. A more discrete trip assignment was then made to the street system expected to be used. These assignments

considered the most likely routings to and from the Project site based on current traffic turning patterns, potential future congestion points, roadway geometrics, and traffic signal controls.

The estimated inbound and outbound Project trip percentages at the study intersections and site driveways is shown in Appendix 18 of this report. The net Project AM and PM peak hour volumes assigned to these intersections are shown in **Figures T-4 and T-5**, respectively.

Access

Vehicular access to the Project site would be designed in accordance with City code requirements. Parking in the subterranean parking garage would be restricted to employees and visitors to uses on the Project site. Access to the subterranean parking area will be provided by driveways on the south side of Constellation Boulevard, the west side of Century Park East, the north side of Olympic Boulevard. The valet drop-off area would be served by one entry and one exit driveway on the east side of Avenue of the Stars. In addition, there is an exit-only driveway connecting to Century Park East south of Olympic Boulevard, via a subterranean roadway from the garage.

Parking and Pedestrian Access

The following parking analysis is based upon a Parking Capacity Study prepared by International Parking Design, Inc., included as an appendix to the Project traffic study. Currently, there are 45 parking spaces at grade, 186 spaces on parking level A, 604 spaces on level B, 1,144 spaces on level C, 1,155 spaces on level D, 1,151 spaces on level E and 1,186 spaces on level F totaling 5,471 parking spaces on-site. In addition, there are 451 off-site parking spaces in the garage west of the Century Plaza Hotel, which are covenanted for the site. Therefore, the existing parking supply for the overall site is 5,922 spaces. The code parking required for the 2029 and 2049 Century Plaza Towers is 4,205 spaces. This requirement is currently and would continue to be fully satisfied by available on-site parking supplies. Code parking required for 2020 and 2040 Avenue of the Stars is 1,717 spaces.

Construction of the proposed Project would remove all of the site uses except for the Century Plaza Towers and the subterranean parking garage. Due to the structural improvements to the subterranean columns, parking spaces in the garage would be modified.

The total code required parking spaces for the proposed Project is 6,065 spaces and includes parking space reductions pursuant to Los Angeles Municipal Code Section 12.21-A4(c) and Section 12.24-Y. Section 12.21-A4(c) provides for parking reductions for bicycle spaces provided on-site. In addition, Section 12.24-Y provides further parking reductions for commercial buildings located within 1,500 feet from a transit facility.

The Project has two alternatives for parking. The preferred parking plan would provide all code required parking on-site. The Project would provide 45 parking spaces at grade, 172 spaces on parking level A, 597 spaces on level B, 1,222 spaces on level C, 1,233 spaces on level D, 1,229 spaces on level E and 1,264 spaces on level F. Additionally the Project would provide parking spaces on portions of two levels that currently do not provide parking. This would include 409 spaces on the Parking level and 187 spaces on the Plaza level for a total of 6,358 on-site parking spaces. The proposed parking plan would include tandem parking with parking attendants on all levels except for level B.

Alternatively, the Project would satisfy all code required parking by providing on-site and off-site parking. Under this plan, the Project would provide 45 spaces at grade, 177 spaces on parking level A, 595 spaces on level B, 1,112 spaces on level C, 1,123 spaces on level D, 1,119 spaces on level E and 1,154 spaces on level F. Additionally the Project would provide parking spaces on portions of two levels that currently do not provide parking. This would include 372 spaces on the Parking level and 170 spaces on the Plaza level for a total of 5,867 on-site. Currently, 451 off-site parking spaces are

Figure T-4 Net Project Traffic Volumes-AM Peak Hour

Figure T-5 Net Project Traffic Volumes-PM Peak Hour

provided by covenant and agreement in the parking garage at 2030 Century Park West, for a total of 6,318 spaces.

As mentioned above, the code parking required for the 2029 and 2049 Century Plaza Towers is 4,205 spaces. This requirement is currently and would continue to be fully satisfied by available parking supplies on-site.

For the Project uses, the required parking is 1,860 spaces including parking space reductions pursuant to Los Angeles Municipal Code Sections 12.21-A4(c) and 12.24-Y. Together with the parking requirements of the Century Plaza Towers, requirements for the overall site after Project completion would be 6,065 spaces. This parking requirement would be fully satisfied by the parking spaces that would be provided at that time as identified above. No parking impact is anticipated as a result of the proposed Project.

Pedestrian access to the Project and the plaza would be available from numerous locations along Avenue of the Stars, Constellation Boulevard and Century Park East. Pedestrian access into the new office building would be available from Avenue of the Stars on the west side, as well as from the plaza on the eastern side. In compliance with the Century City North Specific Plan, a grade-separated pedestrian crossing is being provided below Avenue of the Stars to allow pedestrians to easily walk between the Century Plaza Hotel and the Project site.

The pedestrian corridor would connect the existing courtyard at the Century Plaza Hotel to the new plaza elevation by way of a well-lit and ventilated pedestrian corridor under Avenue of the Stars that would be approximately 16 feet wide, and between 10 and 15 feet in height. A canopy of signage would mark the enlarged entry on the Hotel side, and a series of murals would decorate the pedestrian corridor itself (see **Figure PD-13**). The pedestrian corridor would have a tiled floor, plaster walls and a plaster ceiling with cove lighting. The pedestrian corridor slopes down from the Hotel courtyard about 5 feet over 150 feet to an escalator that connects up one level to the Plaza level lobby. The Plaza level lobby is lined with retail uses and connects directly to the landscaped plaza. Pedestrian access between the parking levels and the structure would be available using elevators, escalators and stairwells.

Traffic Growth and Related Projects

Based on analyses of the trends in traffic growth in the area and as generally recommended by the Los Angeles Department of Transportation (LADOT) in previous studies, an annual traffic growth factor of 1.5 percent was used. This growth factor accounts for increases in traffic resulting from small-sized projects, or outside of the study area. This growth factor, compounded annually, was applied to the 2001 traffic volumes to develop an estimate of the future year 2005 baseline volumes.

Also included in the future year analysis were related projects proposed or under construction. Information regarding potential related projects within an approximate two-mile radius of the Project site was obtained from the records of LADOT and from recent traffic studies in the Project vicinity. A summary of the related projects is provided in Section IV.

The expected traffic generation of these related projects was estimated by using the trip generation rates in **Appendix 18** where applicable, or was obtained from previous traffic studies. The estimated traffic generations of each related project is also included in **Appendix 18**. These trips were distributed and assigned using similar assumptions and rationale as applied to Project traffic. For purposes of a conservative analysis, it was assumed that all of these related projects would be completed by 2005.

To determine the 2005 Without Project traffic volumes, the related projects traffic was combined with the existing peak-hour traffic volumes increased by 1.5 percent per year. The resulting 2005 Without

Project intersection traffic volume estimates are shown in **Figures T-6 and T-7** for the AM and PM peak hours, respectively. These are the "benchmark" values used in analyzing Project traffic impacts on the street system. They represent a conservative condition due to several factors, including: some projects may implement traffic reduction programs; transit usage may increase; the effect of internal trip linkages and pass-by/diverted trips have not been credited for all projects; and not all projects are expected to be built as described or within the study time frame. Thus, actual future traffic volumes in the study area could be less than analyzed.

Highway System Improvements

Two of the related projects included in the cumulative analysis, Constellation Place and the Fox Studios development, are expected to implement a number of traffic improvement measures involving several study intersections. These improvements are summarized below and were assumed in the future year analyses only to the extent the improvements were guaranteed by bonds.

Constellation Place

This project, now under construction, has funded the installation of the state-of-the-art Adaptive Traffic Control System (ATCS) for an area generally bounded by the Santa Monica (I-10) Freeway, Sawtelle Boulevard, Wilshire Boulevard, Century Park East, Olympic Boulevard and La Cienega Boulevard (at approximately 73 locations). ATCS has been determined by LADOT to increase intersection capacity by at least three percent (which in combination with an Automated Traffic Surveillance and Control (ATSAC) intersection provides a 10 percent minimum increase in intersection capacity). This related project is also responsible for installing the following intersection improvements:

- Constellation Blvd. & Ave. of the Stars – A westbound right-turn lane;
- Olympic Blvd. & Century Park West – An additional (second) eastbound left-turn lane;
- Olympic Blvd. & Overland Ave. – An eastbound right-turn lane.

Fox Studios

The Fox Studios development is expected to be implementing the following additional intersection improvements by 2005:

- Constellation Blvd. & Ave. of the Stars – A shared northbound through/right-turn lane;
- Galaxy Wy. & Ave. of the Stars – An additional (second) eastbound left-turn lane and measures to prohibit east-west through traffic across Avenue of the Stars;
- Pico Blvd. & Century Park East – A westbound right-turn lane;
- Pico Blvd. & Ave. of the Stars – An additional (third) eastbound left-turn lane;
- Pico Blvd. & Motor Ave. – An additional (third) westbound through lane;
- Pico Blvd. & Overland Ave. – An additional (second) northbound right-turn lane; and
- 405 Fwy. NB On-Ramp/Tennessee Ave. & Cotner Ave. – Northbound and southbound left-turn lanes.

There are two other transportation improvements that are of regional significance and either are or will soon be underway. They are the addition/completion of high-occupancy vehicle (HOV) lanes on the San Diego Freeway and the Santa Monica Boulevard Transit Parkway project. Both of these improvements are described in greater detail below.

Figure T-6 Future (2005) Without Project Traffic Volumes-AM Peak Hour

Figure T-7-Future (2005) Without Project Traffic Volumes-PM Peak Hour

I-405 HOV Lanes

As part of an ongoing project, Caltrans is continuing to plan for and construct HOV lane segments on the San Diego Freeway, towards providing a continuous HOV system on this interstate. Several of these improvements are near the Project area and can be expected to benefit and help stabilize overall traffic flow. In January 2002, Caltrans completed and opened an eight-mile HOV lane for southbound travel over the Sepulveda pass, between the Ventury Freeway (US-101) and Waterford Street. This recent improvement has served not only to increase freeway capacity, but to also add to the connectivity of the HOV system by linking to the pre-existing HOV lane segment north of the Sepulveda Pass. An extension of the recently completed southbound HOV lane is scheduled to begin construction in late 2003 and to be completed in summer of 2006. This HOV lane addition will span from Waterford Street, where the recently added lane ends, southerly to the Santa Monica Freeway. Finally, construction of a northbound HOV lane over the Sepulveda pass is scheduled to begin construction in 2006.

Santa Monica Boulevard Transit Parkway

The other regional improvement is the Santa Monica Boulevard Transit Parkway project, which is very close to the Project site. This improvement is expected to improve both traffic flow and transit service overall along the Santa Monica Boulevard corridor. It will extend approximately 2.5 miles, from the Beverly Hills City limit on the east to the San Diego Freeway on the west. The improvement is anticipated to be constructed as what is referred to as the "Classic Boulevard" design, with construction slated to begin in early 2003 and be completed in the summer of 2005. The Classic Boulevard is a multimodal transportation improvement which will consolidate "Big" or north Santa Monica Boulevard, "Little" or south Santa Monica Boulevard and the abandoned Southern Pacific Railroad right-of-way to provide:

- Roadway Improvements -- A center roadway with three vehicular through lanes in each direction, plus a landscaped median. The existing double intersections for both north and south Santa Monica Boulevard will be replaced with single four-legged intersections at nearly all major cross streets. Left-turn lanes will also be installed on Santa Monica Boulevard, as will right-turn only lanes at most locations. On-ramp improvements will also be made at the San Diego Freeway interchange.
- Bicycle Lanes -- A Class II bicycle lane in each direction. The bicycle lanes will be separated from parked cars by landscaped medians on either side of the Boulevard that are designed to create primarily one-way frontage roads for local businesses and neighborhood street access.
- Bus Priority -- An eastbound transit lane through Century City and bus priority treatment at all signalized intersections, to facilitate timely bus movement through the corridor. Transit usage will be further enhanced via landscaping and bus stop improvements included as part of the Classic Boulevard treatment.

Analysis of Future Traffic Conditions (With and Without Project)

The analysis of future traffic conditions at the study intersections was performed using the same Critical Movement Analysis procedures described previously. The improvements detailed under the Highway System Improvements section, have been taken into account in the following analyses:

Traffic volumes for the analysis were developed as follows:

- As described earlier, future benchmark traffic volumes for the 2005 Without Project conditions were determined by combining area traffic growth with new traffic generated by related projects, as illustrated in **Figures T-6** and **T-7** for the AM and PM peak hours, respectively.

- Traffic volumes generated by the proposed Project were then combined with the appropriate benchmark volumes to develop the 2005 With Project traffic volumes.

The future year 2005 With Project traffic volumes at the study intersections are shown in **Figures T-8** and **T-9** for the AM and PM peak hours, respectively. The critical movement analyses for future traffic conditions at all of the study intersections are summarized in **Table V.M-13** for the AM and PM peak hours. Prior to the Project (Year 2005 Without Project), twenty study intersections would be operating at LOS E or F. Eighteen of these intersections would be at LOS E or F in both peak hours. For reference, the critical movement analysis for existing conditions is also shown in Table V.M-13.

Based on the Revised LADOT Methodology presented in **Table V.M-12**, the Project may have a potentially significant impact at one study intersection, Santa Monica Boulevard (North) at Avenue of the Stars, in the AM peak hour. This impact can be mitigated to a less than significant level through implementation of mitigation measure T-1. Mitigation measure T-1 requires the applicant to implement a Transportation Demand Management (TDM) program for the Project. It is estimated that the Project TDM program will achieve at least a five percent reduction in peak hour trips. Taking into account these trip reductions, the Project impact analysis was rerun to determine the effectiveness of the TDM program. The results of this mitigation measure at the significantly affected intersection, as well as the other study intersections is also shown in **Table V.M-13**. Overall, with implementation of mitigation measure T-1, the Project would result in a less than significant traffic impact.

Regional Traffic Impacts

To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Congestion Management Program (CMP) was enacted by Proposition 111. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program (STIP) process. A countywide approach has been established by the Metropolitan Transportation Authority, the local CMP agency, designating a highway network that includes all state highways and principal arterials within the County and monitoring the network's Level of Service to implement the statutory requirements of the CMP. This monitoring of the CMP network is one of the responsibilities of local jurisdictions. If Level of Service standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

The Congestion Management Program (CMP) for the County of Los Angeles requires that all freeway segments where a project is expected to add 150 or more trips in any direction during the peak hours be analyzed. An analysis is also required at all CMP intersections where a project would likely add 50 or more trips during the peak hours.

The two nearest CMP freeway monitoring locations, and hence the freeway segments expected to experience the most Project traffic, are: 1) the Santa Monica (I-10) Freeway east of Overland Avenue, and 2) the San Diego (I-405) Freeway north of Venice Boulevard. The estimated Project trips on these segments are as follows:

- Santa Monica (I-10) Freeway e/o Overland Avenue: 10 vehicles westbound and -18 vehicles eastbound in the AM peak hour; -68 vehicles westbound and -22 vehicles eastbound in the PM peak hour.
- San Diego (I-405) Freeway n/o Venice Boulevard: 10 vehicles westbound and -18 vehicles eastbound in the AM peak hour; -68 vehicles westbound and -22 vehicles eastbound in the PM peak hour.

These Project volumes are below the CMP threshold value for freeway segments and no CMP analysis is required.

Figure T-8 Future (2005) With Project Traffic Volumes-AM Peak Hour

Figure T-9 Future (2005) With Project Traffic Volumes-PM Peak Hour

Insert Table V.M-13
Future (2005) Conditions, CMA and LOS Summary (Page 1 of 3)

Insert Table V.M-13
Future (2005) Conditions, CMA and LOS Summary (Page 2 of 3)

**Insert Table V.M-13
Future (2005) Conditions, CMA and LOS Summary (Page 3 of 3)**

The two nearest intersections that are both CMP and study intersections are: 1) Santa Monica Boulevard and Wilshire Boulevard, and 2) Wilshire Boulevard and Beverly Glen Boulevard. The Project's maximum net contributions are expected to be -10 trips (AM peak hour) to the intersection of Santa Monica Boulevard and Wilshire Boulevard and -9 trips (AM peak hour) to the intersection of Wilshire Boulevard and Beverly Glen Boulevard. These contributions are below the CMP threshold value for intersections. Furthermore, the already conducted analysis for these two intersections determined there would be no significant Project impacts.

Mitigation Measures

The following mitigation measures would reduce Project related impacts to a less than significant level:

- T-1** The Project shall implement a Transportation Demand Management (TDM) program as set forth in Appendix 18 and in compliance with all TDM/trip reduction ordinances of the City of Los Angeles. The TDM program shall be designed and operated to encourage ridesharing, transit usage and bicycle usage among Project employees, with the goal of achieving Project vehicular trip generations of 996 trips or less during the AM peak hour and 1,119 trips less during the PM peak hour. Among the services and amenities expected to be included in the TDM program are designated carpool and vanpool parking spaces; bicycle parking, clothes lockers and related facilities; centralized ridesharing and public transit information; on-site sale of transit passes; and participation in the Century City Transportation Management Organization that is to be developed by the Constellation Place project. The Program includes financial penalties for non-compliance and the ability to implement additional or other measures as necessary should it be determined that the Project has not attained the above trip generation targets. See Appendix 18 and LADOT Letter dated July 11, 2002 in Appendix 13. The final TDM program, including a monitoring procedure, will be refined in consultation with LADOT.
- T-2** A Project construction traffic control plan will be developed, to the satisfaction of LADOT, including a designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate any traffic impacts during construction.
- T-3** Construction employees commuting to the project site shall not be allowed to park on public streets.

Significant Project Impacts After Mitigation

As indicated in the preceding summary, assuming 50 percent internal trip adjustments (i.e., Revised LADOT Methodology), the proposed Project may significantly impact the intersection of Santa Monica Boulevard (North) at Avenue of the Stars. To mitigate this potential impact, the applicant shall implement a Transportation Demand Management (TDM) program for the project. The TDM program will be designed and operated to further encourage ridesharing, transit usage and bicycle usage among project employees. Among the services and amenities expected to be included in the TDM program are designated carpool and vanpool parking spaces; bicycle parking, clothes lockers and related facilities; centralized ridesharing and public transit information; on-site Transportation Coordinator providing assistance with carpool and vanpool matching; on-site sale of transit passes; and participation in the Century City Transportation Management Organization that is to be developed by the Constellation Place project. The final TDM program will be refined in consultation with LADOT and will comply with all applicable TDM/trip reduction ordinances of the City of Los Angeles. As shown in Table V.M-12, the office use of the proposed Project is expected to generate 943 AM and 833 PM peak hour trips. It is estimated that the Project TDM program will achieve at least a five percent reduction in these trips

amounting to 47 fewer AM peak hour trips and 42 PM peak hour trips. Incorporating these reductions into the previously calculated table, the adjusted net trips for the proposed Project uses due to the TDM mitigation measure are 996 AM peak hour trips and 1,119 PM peak hour trips.

The results of this mitigation measure at the significantly affected intersection, as well as the other intersections is provided above in Table V.M-13. As indicated, the implementation of the program TDM would effectively mitigate the Project impact at the intersection of Santa Monica Boulevard (North) at Avenue of the Stars to a less than significant level. This measure would also further reduce non-significant Project impacts at other intersections.

As indicated in the traffic analysis, the Project will not significantly impact any residential streets. Nevertheless, the Project voluntarily agrees to provide funding to assist surrounding residential neighborhoods in implementing a Neighborhood Traffic Protection Program (NTPP) to minimize intrusion by non-residential traffic. In addition to administering the funds, LADOT will be responsible for developing and implementing the NTPP in consultation with the appropriate residential neighborhood groups and associations and Council Office. Measures may include, but are not limited to, traffic control devices including turn prohibitions, traffic diverters, street closures, partial cul-de-sacs, speed humps, retiming of traffic signals, right-turn-on-red restrictions, or other measures to discourage traffic intrusion.

Cumulative Impacts

Trips generated as a result of development of projects included under the related projects list were estimated by using trip generation formulas where applicable, or were obtained from previous traffic studies. The estimated trips were distributed and analyzed as part of the future 2005 With and Without Project conditions. As shown above, the proposed Project would result in a less than significant traffic impact after implementation of mitigation measures and would not contribute to cumulative traffic impacts.

Figure T-10 Construction Haul Route

N. UTILITIES AND SERVICE SYSTEM

1. Wastewater

Existing Conditions On-Site Generation

Currently the proposed Project site is developed with a mix of land uses including office (287,701 sf), theater (148,481 sf), restaurant (144,390 sf), retail (57,316 sf), and health club (40,934 sf). The City of Los Angeles assumes water consumption is equal to wastewater generation as a worst case scenario. Based on a water consumption analysis prepared by the LADWP. (**Appendix 14**), water demand generated from the existing land uses is approximately 61 AF per year or an average daily demand of 54,351 gallons of water per day (GPD) seven days per week. This determination is based upon year 2000 water billings. Therefore, it is assumed that wastewater generated from the existing land uses is approximately 54,351 gallons per day (GPD) of wastewater. The City of Los Angeles assumes water consumption is equal to wastewater generation as a worst case scenario. Infrastructure and treatment facilities serving the proposed site allocate a percentage of their total capacity to the existing land uses. Development of the proposed Project would include the removal of two existing buildings prior to construction. The reduction in wastewater generation from the elimination of existing land uses will be subtracted from the proposed Project contribution as a means of predicting the net contribution from the proposed Project.

The sewer infrastructure in the vicinity of the proposed Project includes existing eight-inch, ten-inch, twelve-inch, and fifteen inch sewer pipes located northeast of Avenue of the Stars which all feed into an existing 33-inch concrete sewer in Century Park East. Additionally, there is a 10-inch sewer pipe located southwest of Avenue of the Stars. The nearest line to the Project is a 12-inch line in Avenue of the Stars. This line has a design flow capacity of 1.9 cubic feet per second (cfs).

The main sewer trunk line in the vicinity is a 33-inch line along Pico Blvd. The recommended design flow capacity limit for the main trunk line is 21.0 cfs or approximately 13.5 million GPD. The existing flow is 6.01 cfs based on available flow gauging records.

Treatment Facilities

The Hyperion Treatment Plant (HTP) currently provides wastewater treatment for nearly all of the City of Los Angeles, as well as several contract cities including Santa Monica, Beverly Hills, Burbank, Culver City, El Segundo, Glendale, San Fernando and portions of Los Angeles County. Completed in 1950, the Hyperion Treatment Plant was originally designed with a treatment capacity of 320 million GPD or 320 MGD. Since that time, the plant's capacity to provide full secondary treatment has been increased to 450 MGD. Current operations treat approximately 360 MGD to an acceptable level of primary and secondary treatment standards. Peak wet weather flows up to 1,000 MGD can be handled for short periods.

Treated wastewater is discharged by a 5-mile outfall pipe into the Pacific Ocean on a daily basis. The HTP also has a one-mile outfall pipe that is used only in emergency situations, and a seven-mile outfall pipe that is no longer maintained. Solids generated from the treatment process are not pumped through the outfall pipe, but instead are managed on land through a variety of methods

Threshold of Significance

The City of Los Angeles has determined that a proposed Project would result in a significant wastewater impact if:

- The project would cause a measurable increase in the wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

- The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

Project Impact

The City of Los Angeles Bureau of Sanitation has indicated that the proposed Project would result in an additional wastewater generation of 0.02 cfs (about 10,000 gpd).⁵⁴ This represents approximately 1.0% of the flow design capacity of limit of the 12-inch sewer line in Avenue of the Stars. As indicated above, the City of Los Angeles assumes water consumption is equal to wastewater generation as a worst case scenario. The water consumption analysis prepared by the LADWP, determined that the Project would result in a net increase in water demand of 21 acre feet per year or an average daily increase of 18,711 gpd. This amount would represent approximately 1.5% of the flow design capacity limit of the existing sewer line. The City Bureau of Sanitation has indicated that should the Project generate either 10,000 or 18,711 gpd, there is sufficient capacity in the sewer system to accommodate the Project.⁵⁵ Additionally, the Project would be constructed under New Title 24 building requirements. New Title 24 provides for more stringent water conservation measures. For reference, a comparison of New Title 24 requirements to the existing on-site fixtures is provided in **Table V.N.1-1**.

**Table V.N.1-1
 Current Title 24 Requirements Versus Existing Uses**

Fixture	Flow Requirement
<u>Existing Conditions</u>	
Toilet	3.5 gallons/flush
Urinal	3.0 gallons/flush
Sink Faucet	No Restriction
<u>New Title 24</u>	
Toilet	1.6 gallons/flush
Urinal	1.0 gallons/flush
Sink Faucet	0.5 gallons/minute
Source: Syska Hennessy, Inc., 2001	

Mitigation Measures

The Project would not generate a significant wastewater impact. Therefore, no mitigation measures are warranted.

Significant Project Impact After Mitigation

The proposed Project would not generate significant wastewater impacts.

Cumulative Impact

Related projects would generate an estimated 625,371 GPD of wastewater. (Calculation of cumulative wastewater generation is shown in **Table V.N.1-2**.) Adding the proposed Project would result in a total wastewater generation of 644,082 GPD. Related projects must comply with the City's water conservation policies would be subject to review for adequate sewer capacity. The cumulative impact

⁵⁴ City of Los Angeles Bureau of Sanitation Wastewater Engineering Services Division, letter dated April 26, 2002.

⁵⁵ City of Los Angeles Bureau of Sanitation, letter dated April 26, 2002, and phone conversation with Mr. Nelson Sarti, Bureau of Sanitation, May 13, 2002.

would be consistent with the General Plan and no major inconsistencies with the Wastewater Facilities Plan are anticipated. Therefore, cumulative impacts to the wastewater treatment systems would be considered less than significant.

INSERT Table V.N.1-2
Daily Wastewater Generation from Related Projects

2. Stormwater

Existing Conditions

The majority of the proposed Project site is currently developed with two existing eight-story structures and a plaza. The plaza is mostly hardscape and most of the remaining surfaces on the site are impermeable, except for a landscaped area that surrounds the buildings. Therefore, virtually all of the stormwater runoff from the site enters the area storm drains. The stormwater system serving the existing uses is a 12-inch line, which ties into the City's line in Avenue of the Stars.

Urban run-off within the City of Los Angeles is diverted to the appropriate storm drain pipe and the nearest catch basin. The collected stormwater flows through a network of pipes and open channels and is then released directly into the Pacific Ocean, specifically, Santa Monica and San Pedro Bays.

Stormwater discharges are regulated by the National Pollution Discharge Elimination System (NPDES). Stormwater permits are issued by the governing agency under the Federal Water Pollution Control Act, commonly referred to as the Clean Water Act. NPDES permits are issued for "non-point" discharge sources that transmit stormwater into various storm drain infrastructure such as gutters, catch basins, and pipes. As part of the permitting process, NPDES also requires the preparation of a site-specific Stormwater Pollution Prevention Plan (SWPPP) prior to construction. The purpose of the SWPPP is to identify potential pollution sources and receptors associated with site development, and to prepare a plan to mitigate and control the pollutants during the pre-construction, construction, and post-construction stages of development.

An existing NPDES permit was issued to the subject property for the discharge of water from the subterranean drainage system into the City of Los Angeles storm drain system. Pursuant to the existing NPDES permit, discharge water is sampled and tested on a regular basis. It is anticipated that the existing permit and/or its requirements would remain in effect throughout the Project with the possibility of a temporary permit for the construction phase.

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guide (1998), the proposed Project would result in a significant impact to stormwater resources if it:

- Cause flooding during the projected 50-year developed storm event which would have the potential to harm people or damage property or sensitive biological resources;
- Substantially reduce or increase the amount of surface water in a water body; or
- Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

Construction Impacts

The Project would be designed to comply with all applicable construction and operational water quality standards and waste discharge requirements. The proposed Project would be required to file a stormwater plan with the City of Los Angeles for grading activities during the construction phase. As mentioned above, it is anticipated that the existing NPDES permit and/or its requirements would remain in effect throughout the Project with the possibility of a temporary permit for the construction phase.

There are two major sources of stormwater pollution that can occur during the construction phase of a project. The first source is materials found on the construction site that contain pollutants that can be transported through runoff. Pollutants can be found in the following construction-related materials including: adhesives, cleaning agents, landscaping materials, plumbing materials, paint,

heating/cooling machinery, masonry materials, floor and wall coverings, demolition debris, construction equipment vehicles and maintenance supplies. Proper handling and storage of such materials would effectively mitigate any potential impacts to a less than significant level.

The second major source of stormwater pollution during construction is sedimentation. Grading activities during the construction process can expose soils that are more susceptible to erosion. Best Management Practices (BMPs) from the stormwater plan should be designed to limit the amount of sediment entering the storm drain system, controlling runoff so that sediment is captured before the stormwater leaves the site and enters the storm drain system. The proposed Project could result in a potential impacts to the water quality of runoff from the site. However, implementation of the appropriate BMPs and compliance with the stormwater plan would reduce construction related stormwater pollution impacts to a less than significant level. BMPs for the proposed Project are listed as mitigation in this section.

Operational Impacts

The proposed Project site is currently covered with impermeable surfaces, including two eight story buildings, a subterranean parking garage and a hardscape plaza area. All stormwater on the Project site is conveyed to the storm drain system through the gutters of the buildings and drainage mechanisms located throughout the site. 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 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. Implementation of BMPs that address drainage design considerations for the proposed Project would reduce flows by diverting runoff into landscaped areas, and away from paved surfaces. The use of permeable ground surfaces and grading landscaped areas to retain water would help minimize the amount of runoff.

The proposed Project will not generate stormwater run-off in excess of the existing conditions of the site, and not affect the amount of surface water in any of the surrounding water bodies. The majority of the run-off from the proposed Project will be from rooftop drainage, sidewalks, driveways and other impermeable surface drainage, which will flow through existing municipal storm drain facilities. The proposed Project design would be consistent with existing conveyance facilities and would not result in a permanent, adverse change to the movement of surface water sufficient to produce substantial change in the current or direction of water flow. Potentially significant impacts to water quality could result from the release of toxins into the stormwater drainage channels during the routine operation of commercial uses, including restaurants. However, the potential impacts would be mitigated to a less than significant level by incorporating stormwater pollution control measures. With conformance to a stormwater plan, an NPDES permit, and mitigation measures U-1 through U-15, the proposed Project would result in a less than significant impact with regard to stormwater runoff.

Mitigation Measures

Implementation of the following mitigation measures would reduce stormwater impacts to a less than significant level.

- U-1** The Project shall comply with NPDES requirements of the existing stormwater drain permit along with the preparation of a stormwater plan and other applicable filings prior to construction.
- U-2** During construction, drainage of the Project site shall be disposed of in a manner satisfactory to the City Engineer and the Regional Water Quality Control Board.
- U-3** The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period.

The design of structural BMPs shall be in accordance with the Development of Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

- U-4 Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- U-5 Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- U-6 Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.
- U-7 Reduce and recycle waste, including oil and grease, to the extent feasible.
- U-8 Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.
- U-9 All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
- U-10 The legibility of signs and stencils discouraging illegal dumping must be maintained.
- U-11 Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.
- U-12 Storage areas must be paved and sufficiently impervious to contain leaks and spills.
- U-13 Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.
- U-14 The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.
- U-15 Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the Department of City Planning's public counter or from the City's website at www.lastormwater.org.

Significant Project Impacts After Mitigation

The construction and operation of the Project could potentially result in a significant impact. Implementation of identified mitigation measures, BMPs, and compliance with NPDES regulations would reduce any Project-related impacts to stormwater drainage to a less than significant level.

Cumulative Impacts

Development of projects included in the related project list will not substantially contribute additional runoff to the existing storm drainage system. Currently, most of the properties are predominantly

covered with impermeable surfaces, conveying the majority of runoff into the storm drains. Therefore, the cumulative increase in runoff from these projects is minimal and is not anticipated to cause downstream flooding. In addition, the cumulative projects may be replacing older buildings that could be in violation of current NPDES standards, with new structures that would be required to comply with NPDES stormwater quality discharge requirements. Therefore, development of projects in the cumulative project list could result in reduced and less polluted runoff.

Due to the extent of impermeable surface area, the cumulative increase in runoff is minimal and not expected to affect the stormwater drainage system capacity. Therefore, cumulative impacts associated with stormwater drainage from the Project site, as well as those associated with related projects, are expected to be less than significant.

3. Water Supply

Existing Conditions

Water Supply

The Los Angeles Department of Water and Power (LADWP) currently supplies water to the proposed Project site. The LADWP acquires its water supply from three sources including, the Los Angeles Aqueduct (LAA), the Metropolitan Water District of Southern California (MWD) and local ground water.⁵⁶ The LAA has supplied the LADWP with approximately half of the City's water over the last 10 years. The MWD is the largest wholesaler of water in California. On average, the MWD has provided the City with 35 percent of its water supply. Water delivered by the MWD comes from the Colorado River and Northern California's Bay-Delta. The City is entitled to 110,000 AF per year of local groundwater supplies from the San Fernando Basin (SFB), Central, Sylmar and West Coast groundwater basins. Local wells have produced an average of 99,750 AF per year⁵⁷, accounting for approximately 15 percent of the City's water supply. About 80 percent of the local groundwater supplied to the City of Los Angeles is provided by the SFB.

Los Angeles Aqueduct

The LAA is an important water resource for the LADWP due to its ability to provide the highest quality water at the lowest cost. Historic provision of water from the Mono Basin and Owens Valley has resulted in degradation of the natural environment. Consequently, the amount of water delivered from these sources will be reduced in order to protect the environment. The reduction in flows from the Mono Basin will be used to raise the level of Mono Lake. Other projects will include mitigating air quality problems in Owens Lake and re-watering a 60-mile stretch of the Owens River for a warm-water fishery. The LAA is expected to provide approximately 321,000 AF per year or 40 percent of the City's average year water supply for the next 20 years. At a current total annual water demand of approximately 665,000 AF, the LAA supplies on average 332,500 AF (50%). LADWP continues to search and improve LAA supplies.

For fiscal year ending 2001, the LAA delivered 238,997 AF to the City, which was 35 percent of total supply. This is 79 percent of the normal LAA delivery over the past ten years. LAA water deliveries fluctuate because the system is primarily fed by snowmelt runoff that varies with hydrologic conditions in the Eastern Sierra Nevada (*LADWP Urban Water Management Plan Annual Update 2001*).

Metropolitan Water District of Southern California

The MWD is a State-chartered association of Southern California water agencies responsible for supplying supplemental water needs to the entire region. The MWD has provided water to the City for nearly 60 years, and will continue to be a primary provider into the future. The LADWP expects that by the year 2020, MWD will provide the City with approximately 300,000 AF per year, or 38 percent of the City's normal water needs, and possibly as much as 60 percent in drought years.

LADWP purchased 343,396 AF from MWD, which was 51 percent of the City's total supply, during fiscal year 2001. LADWP purchases made up approximately 16% of MWD's total water sales to the Southern California region. The fact that the City has been able to rely on MWD to consistently meet its supplemental water needs underscores the importance of MWD to LADWP, and the value of the investments that the City and other member agencies have made to enable MWD to provide for regional water reliability.

⁵⁶ Source: The Los Angeles Department of Water and Power, Urban Water Management Plan, 2000 and Urban Water Management Plan Annual Update, 2001.

⁵⁷ Source: Los Angeles Department of Water and Power, Information Request Letter, dated February 28, 2002.

Currently, the MWD is developing a strategic plan for the equitable distribution of water in Southern California to ensure the ability to meet increasing demands. This plan will focus on guidelines for water shortage allocation and alterations to the rate structure for agencies seeking allocation using MWD facilities. The City and the MWD are also working together to find ways to ensure the reliability of resources through plans aimed at MWD sources.

LADWP is working with MWD and other interested parties to implement California's Colorado River Water Use Plan (California Plan), a strategy that would ensure that California meets its water needs while reducing its reliance on Colorado River surplus waters. California has been using on average 5.2 million AF of Colorado River water, which includes the state's basic entitlement of 4.4 million AF, plus its entitlement of surplus supplies. Current plans to bring California's Colorado River water usage to 4.4 million AF in those years when surplus water is unavailable include water transfer, storage, and exchange agreements.

The CalFed Bay-Delta Program is a cooperative inter-agency group that is attempting to provide solutions for ecosystem problems in San Francisco Bay and the Sacramento-San Joaquin River Delta. In addition to their environmental efforts, the CalFed Bay-Delta Program is working to increase the reliability of supply from the State Water Project and better the quality of the water.

Local Wells

In fiscal year ending 2001, local groundwater sources supplied 85,067 AF of water to the City, 13 percent of the City's total supply. This is about 47,200 AF less than fiscal year 2000. San Fernando Basin groundwater accounted for 68,985 AF of the total amount. Wells in the Central and Sylmar Basins made up the City's remaining groundwater resources, contributing 16,082 AF.

The City holds water rights in four groundwater basins: San Fernando, Sylmar, Central, and West Coast. Annual groundwater entitlements in these basins total approximately 110,000 AF. LADWP plans to continue to maximize production from its groundwater basins in the coming years to offset reductions in imported supplies. Due to poor water quality, the City has not extracted water from the West Coast Basin.

The City's accumulated stored water credit in the San Fernando Basin was 208,609 AF as of October 2000. This is water the City can rely upon in case of a drought or emergency, and is in addition to the roughly 90,000 AF per year entitlement.

Recycled Water

Development of recycled water programs will be a beneficial source of water to the LADWP, that will one day provide a significant amount of water for non-potable uses. The LADWP is working to develop a water-recycling program capable and is on target to reach its goal of recycling 10 percent of total demand by 2010.

Citywide Water Usage

Water from the three primary sources mentioned above is dispersed throughout the City providing water to an array of land uses. For fiscal year 2001, 36 percent of all water used in the City was consumed by single-family residential homes. The remaining water was consumed by multi-family residential (29 percent), commercial (17 percent), governmental (six percent), industrial (three percent), and unaccounted usage (nine percent). This proportioning of the water supply has changed less than one percent over the last ten years, and is assumed to continue into the future.

Despite conservation efforts to reduce the amount of water used each year, increasing population within the City is increasing demands on available water supplies. By the year 2020, water use within the City is expected to grow from 665,695 AF per year (2001) to 800,000 AF per year. The LAA

and the local groundwater sources would supply the majority of water to serve new development, through the DWP. The MWD would supply the remaining demand and is expected to have adequate resources to fulfill the 2020 demand.

Existing Consumption

Currently the area to be redeveloped is developed with a mix of land uses including office (287,701 sf), theater (148,481 sf), restaurant (144,390 sf), retail (57,316 sf), and health club (40,934 sf). Based on a water consumption analysis prepared by the LADWP (**Appendix 14**), water demand generated from the existing land uses is approximately 61 AF per year or an average daily demand of 54,351 gallons of water per day (GPD) seven days per week, as shown in **Table V.N.3-1**. This determination is based upon year 2000 water billings. A percentage of the existing supply and infrastructure capacity serving the area around the Project site is allocated to the existing land uses. Development of the Project would include the removal of all existing land uses, within the area to be redeveloped, prior to construction. The consumption of water from existing land uses will be subtracted from the Project's contribution as a means of accurately calculating the net increase as a result of the Project.

Existing Infrastructure

The LADWP presently maintains the following water mains around the Project area: 8" cast iron main within Constellation Boulevard; 12" cast iron and steel main within Avenue of the Stars; and 12" cast iron mains in both Olympic Boulevard and Century Park East.

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guide (1998), the Project would result in a significant impact if:

- Water supply resources are not available to meet the Project's water supply demand; or
- Existing water infrastructure in the vicinity of the Project do not have sufficient capacity to deliver the Project's water supply.

Project Impacts

The proposed water consumption from the Project is provided in the water consumption analysis prepared by the LADWP (**Appendix 14**). Based on the analysis, the proposed Project would consume 82 AF per year or an average daily demand of 73,062 GPD, as shown in **Table V.N.3-1**. The LADWP has determined that a 35% increase in water demand from 61 AF to 82 AF per year is consistent with projected growth in water demand outlined in LADWP's year 2000 Urban Water Management Plan Update. The LADWP has further indicated that estimated water needs of the Project could be met by the existing water system.⁵⁸ Therefore, the Project would not result in a significant impact on water supply.

⁵⁸ City of Los Angeles Department of Water and Power, letter dated May 15, 2002.

Table V.N.3-1
Existing and Proposed Water Demand

	Square Footage	Acre Feet Per Year	Average Daily Water Use (GPD) ^(a)
Proposed	778,947	82.0	73,063
Existing	678,822	61.0 ^(b)	54,351
Net Total		21.0	18,712

^(a) Average daily demand is calculated by computing Acre feet per year into gallons per year and dividing by 365. The formula is:
 $[(AFY/365days) \times (1 CF/0.000023 AF) \times (7.48 gallons/1 CF)] = (average\ gallons/day)$
^(b) Based on year 2000 Billed Water Usage at 100 percent occupancy.
 Source: LADWP Water Availability Assessment for 2000 Avenue of the Stars, May 2002

Mitigation Measures

Although Project impacts are less than significant, the following mitigation measures would help to further reduce impacts:

- U-16** The proposed Project shall use automatic sprinkler systems for landscape irrigation, which are adjusted on a seasonal basis to operate during hours where water loss due to evaporation would be minimized.
- U-17** Where feasible, reclaimed water shall be used to irrigate landscaped areas.
- U-18** The proposed Project shall comply with all sections of the City of Los Angeles' Water Conservation Ordinance (Ordinance No. 166,080) and Xeriscape Ordinance, as applicable.
- U-19** The proposed Project shall use lower-volume water faucets and water saving showerheads in all construction.
- U-20** The proposed Project shall use plumbing fixtures that reduce potential water loss from leakage due to excessive wear of washers.
- U-21** The proposed Project shall incorporate water conservation measures as appropriate and required by the City of Los Angeles Department of Building Ordinances (No. 163,532, No. 164,093, and No. 165,004) and subsequent amendments, which include the installation of low-flow water fixtures and xeriscape.

Significant Project Impacts After Mitigation

The proposed Project would not generate significant adverse impacts to water supply and infrastructure.

Cumulative Impact

Implementation of all projects within the related project list would result in the consumption of approximately 597 AF per year. Calculation of this number is shown in **Table V.N.3-2**. The addition of the proposed Project would result in a net water consumption of 618 AF per year. According to the LADWP Urban Water Management Plan, by the year 2020, water use within the City is expected to grow from 665,695 AF per year (2001) to 800,000 AF per year. The cumulative increase in water demand from related projects is consistent with projected growth in water demand outlined in LADWP's year 2000 Urban Water Management Plan Update. Improvements to the local infrastructure may be required to serve the related projects, and should be evaluated on a project-by-project basis. Although cumulative impacts may be significant, they are expected to be mitigated on a project by-

project fair share basis. Assuming that the related projects comply with the City's required water conservation policies, the impact on water supply would be considered less than significant.

**INSERT TABLE V.N.3-2
DAILY WATER DEMAND FROM RELATED PROJECTS**

4. Solid Waste

Existing Conditions

Everyday, approximately 5,200 tons of solid waste are generated by residential and commercial uses within the City of Los Angeles. The collection and disposal of the City's solid waste is a major undertaking that includes City efforts as well as approximately 80 private contractors collecting residential waste, and over 100 contractors collecting commercial waste. The City of Los Angeles Bureau of Sanitation collects the majority of residential rubbish from single-family residences and some of the smaller multi-family residences; with only a small portion being collected by private collectors. Most commercial developments are served by private collectors, with only a small portion being served by the Bureau of Sanitation.

Collected materials are channeled to one of 12 major permitted Class III landfills, six minor Class III landfills, two unclassified landfills and two transformation facilities. The transfer stations are used to temporarily store materials until they can be loaded onto larger vehicles and transported directly to the landfills. Of the available facilities, refuse from the proposed Project would be taken to; Bradley West, Calabasas, Commerce Refuse to Energy Facility or the Southeast Resource Recovery Facility.

Land set aside for landfills is rapidly being filled due to the large quantities of waste produced each day. In an effort to preserve landfill capacity, several restrictions that limit the disposal of waste have been imposed. Amongst these are: restrictions accepting waste generated only within a jurisdictional area, tonnage permit limitations, operational constraints, and corporate objectives of the landfill owners and operators.

In September 1989, the State approved the California Integrated Waste Management Act, known as AB 939. AB 939 requires that all cities and counties in the State must utilize source reduction, recycling and composting to divert 25 percent of solid waste from reaching the landfills by 1995, and 50 percent by the year 2000. Under this bill, cities and counties are required to generate a Source Reduction and Recycling Element that details the methodology behind the diversion of solid waste. Jurisdictions that do not comply with the mandate are subject to monetary penalties. The Act also established the California Integrated Waste Management Board (CIWMB) as the agency responsible for enforcing the mandates. The City of Los Angeles has exceeded their source reduction goal for the year 2000.

As a result of AB 939, the City of Los Angeles prepared a Solid Waste Management Policy Plan (CiSWMPP) that was adopted in 1994. The CiSWMPP is a description of the City's long-term (30-year) plan to reduce the volume of waste entering the landfills, and includes goals, objectives and policies dealing with solid waste management. The plan also provides direction for necessary revisions to the City of Los Angeles General Plan and Infrastructure Element.

The existing land uses located on the proposed Project site currently generate 3,181.8 pounds of solid waste per day. A breakdown of the land uses that contribute to existing solid waste generation is shown in **Table V.N.4-1**.

Table V.N.4-1
Existing Solid Waste Generation

Land Use	Generation Rate	Total Solid Waste Generated	
	(Lbs./Unit)	(Lbs./Day)	(Lbs./Week)
Office (287,701)	6/1,000 sf	1,726.2 x 5 days =	8,631
Restaurant (144,390)	5/1,000 sf	721.9 x 7 days =	5,053.3
Retail (57,316)	5/1,000 sf	286.6 x 7 days =	2,006.2
Health Club (40,934)	5/1,000 sf	204.7 x 7 days =	1,432.9
Theatre (48,481)	5/1,000 sf	242.4 x 7 days =	1,696.8
Total		3,181.8 lbs	18,820.2
Source: Average Solid Waste Generation Rates, City of Los Angeles, April 1987			

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guide (1998), the proposed Project would result in a significant impact to solid waste management if it would require new systems or supplies for, or substantial alterations to solid waste disposal.

Project Impacts

Construction Impacts

During the construction phase, existing structures would be demolished to make room for the proposed Project. As a result of the demolition process, approximately 80,000 tons of debris would be removed from the Project site. It is anticipated that at least 50 percent of these materials removed from the Project site would be reused and/or recycled. The remaining materials would be disposed of at a landfill. A licensed hazardous waste disposal expert would dispose of all hazardous materials (i.e. asbestos) in accordance with applicable regulations. (See Section V.F, Hazards and Hazardous Materials.) The applicant proposes to implement a recycling program during the construction phase of the Project to reduce the amount of solid waste sent to area landfills. Materials to be recycled or salvaged include glass, concrete, steel, doors, and bathroom fixtures. Diversion of demolition materials would be in conformance with the City’s 50 percent reduction goal. Further, the impact during construction is temporary, and would not extend for the life of the Project. Considering the magnitude of waste generated during the construction process and the limited duration of impact, the Project would generate a less than significant impact on solid waste facilities.

Operational Impacts

Based on generation rates provided by the Los Angeles Bureau of Sanitation, the operational phase of the proposed Project would create approximately 4,614.6⁵⁹ pounds of solid waste per day. **Table V.N.4-2** shows a breakdown of waste generated per land use. The proposed Project would have a net increase of 1,432.8 pounds per day or 4,843.2 pounds per week after subtracting the amount of waste from existing uses to be removed. The City of Los Angeles screening threshold for analysis of potentially significant impacts for solid waste generation is five tons (10,000 pounds) per week. The proposed Project’s net generation would fall below this threshold and well below the actual threshold of significance. No significant impact is expected to occur. Impacts would be further reduced through implementation of the proposed mitigation measures.

⁵⁹ Based on solid waste generation prior to implementation of recycling program.

Table V.N.4.-2
Project Solid Waste Generation

Land Use	Generation Rate (Lbs./Unit)	Total Solid Waste Generated	
		(Lbs./Day)	(Lbs./Week)
Office (719,924)	6/1,000 sf	4,319.5 x 5 days =	21,597.5
Restaurant (30,527)	5/1,000 sf	152.6 x 7 days =	1068.2
Retail (18,318)	5/1,000 sf	91.6 x 7 days =	641.2
Cultural (10,178)	5/1,000 sf	50.9 x 7 days =	356.3
Total		4,614.6 (2.3 tons)	23,663.2

Source: Average Solid Waste Generation Rates, City of Los Angeles, April 1987.

Because we do not know the collector or the receiving landfill, it is premature to perform an analysis of specific landfill capacity. However, landfills with the potential for receiving solid waste from the proposed Project have been examined to determine the potential for impact. The results of this study are shown in **Table V.N.4-3**. As shown, substantial capacity exists at area landfills. In addition, applications are made periodically for the expansion of existing landfills and the creation of new ones. The Bureau of Engineering continually plans (CiSWMP) for solid waste disposal, to assure that the disposal needs and recycling requirements of City development can be met.

Table V.N.4-3
Potential Project Landfills and Capacity

Landfill Name	Location	2000 Total Disposal (Tons)	Peak Disposal (Tons/Day) Permitted	Landfill Capacity (Cubic Yards) Permitted	Remaining Landfill Capacity (Cubic Yards)	Permit Issue Date
Bradley West	San Fernando Valley	2,342,779	10,000	14,629,100	13,630,000	11/10/1999
Sunshine Canyon	Sylmar	1,485,832	6,600	23,720,000	17,120,000	12/17/1994
Scholl Canyon	Whittier	424,836	3,400	69,200	19,380,000	05/01/1996
Puente Hills	Whittier	3,646,069	13,200	106,400,000	30,640,000	01/04/1995
Calabasas	Agoura	346,690	3,500	69,700,000	26,090,000	09/10/1996

Sources: City of Los Angeles DPW telephone communication with Envicom Corporation, June 26, 2001, and Integrated Waste Management Board web site.

Mitigation Measures

While the Project impacts during the construction and operational phase are not considered significant based on City thresholds, the following mitigation measures shall be implemented to further reduce impacts on solid waste resources:

- U-22** The Project applicant shall salvage and recycle construction and demolition materials to the maximum extent feasible. Documentation of a recycling program will be provided to the City of Los Angeles Department of Public Works.
- U-23** The Project applicant shall institute an on-site recycling/conservation program to reduce the volume of solid waste going to landfills in compliance with the City’s goal of a 50% reduction in the amount of waste going to landfills.

Significant Project Impacts After Mitigation

The Project would not result in significant adverse impacts to solid waste capacity.

Cumulative Impact

Related projects would generate an estimated 35,015 pounds of solid waste per day. (Calculation of cumulative solid waste generation is shown in **Table V.N.4-4**.) Build-out of the proposed Project would increase this amount to 36,447.8 pounds of solid waste per day. Because sufficient landfill capacity is available to receive solid waste from the related projects, including the proposed Project, cumulative impacts to the solid waste systems would be considered less than significant.

Table V.N.4-4
Daily Solid Waste Generation from Related Projects

	Use	Generation Rate (Lbs/Unit)	Total Solid Waste Generated (Lbs/Day)
1.	770,000 sf office	6/1,000 sf	4,620
	21,000 sf retail	5/1,000 sf	105
2.	UCLA		
	2000 beds Southwest Campus Housing (1)	10/unit	10,000
	296,700 sf Northwest Campus Phase II	6/1,000 sf	1,780
	1,500 Space Intramural Field Parking	N/A	N/A
	191,900 sf Physics and Astronomy Building	6/1,000 sf	1,151
	95,000 sf Luck Research Center	6/1,000 sf	570
	California NanoSystems Institute*	6/1,000 sf	N/A
	1,000 sf Health Science Seismic Renovation	6/1,000 sf	6
3.	8,912 sf Whole Foods Supermarket	5/1,000 sf	45
4.	115,000 sf Shopping Center	5/1,000 sf	575
	350 du Apartments	10/du	3,500
5.	105 du Condominium	10/unit	1,050
6.	6 pu Gas Station*	N/A	N/A
7.	74,653 sf Office Building	6/1,000 sf	448
8.	Fast Food Restaurant w/Drive Thru*	N/A	N/A

Table V.N.4-4 (Cont.)
Daily Solid Waste Generation from Related Projects

9.	360,000 sf Fox Studio Expansion	5/1,000 sf	1,800
10.	14,800 sf High School Building Renovation	6/1,000 sf	89
11.	Private School*	6/1,000 sf	N/A
12.	7,600 sf Office	6/1,000 sf	46
13.	74,000 sf Office	6/1,000 sf	444
14.	168,000 sf Office	6/1,000 sf	1,008
15.	34 du Condominium	10/du	340
16.	64 du Senior Housing	10/du	640
17.	Convenience Market*	N/A	N/A
18.	34,000 sf Cultural Center	5/1,000 sf	170
19.	20 du Condominium	10/du	200
20.	5,000 sf Retail	5/1,000 sf	25
21.	15,000 sf Retail	5/1,000 sf	75
22.	28,300 sf Office	6/1,000 sf	170
	16,700 sf Retail	5/1,000 sf	84
23.	82,000 sf Office	6/1,000 sf	492
	38,000 sf Shopping Center	5/1,000 sf	190
24.	80 du Senior Housing	10/du	800
25.	16 du Condominium	10/du	160
26.	23 du Condominium	10/du	230
27.	32,000 sf Medical Office	6/1,000 sf	192
28.	133 rm Hotel	2/rm	266
29.	16 du Condominium	10/du	160
30.	152,646 sf Retail Office	6/1,000 sf	916
31.	10 du Condominium	10/du	100
32.	41,500 sf Office	6/1,000 sf	249
33.	23 du Condominium	10/du	230
34.	10 du Condominium	10/du	100
35.	6 du Condominium	10/du	60
36.	15,000 sf Retail	5/1,000 sf	75
	15,000 sf Office	6/1,000 sf	90
37.	4,900 sf Commercial/Retail	5/1,000 sf	25
38.	2.5 Miles Santa Monica Blvd Transit Project*	N/A	N/A
39.	71,000 sf Westfield Shoppingtown Century City	5/1,000 sf	355
40.	-10,000 sf Commercial	5/1,000 sf	-50
	19 du Condominium	10/du	190
41.	85,367 sf Office	6/1,000 sf	512
42.	122,200 sf Harvard Westlake Middle School	6/1,000 sf	733
43.	6,711 trips CCNSP Replacement Trips*	N/A	N/A
Total			35,015
Project Contribution			1,432.8
Cumulative Total			36,447.8
* Size of site not available.			
Source: Average Solid Waste Generation Rates, City of Los Angeles, April 1987			

5. Electricity

Existing Conditions

Service Provider

The Los Angeles Department of Water and Power (LADWP) will provide electrical service to the proposed Project. Service to the site is conveyed via three transformers located within two transformer station rooms located on Level B of the parking garage. Currently, these transformers have a service capacity of 8,500 Kilo Volt Amperes (KVA). While some service providers in California are currently experiencing an energy crisis, LADWP has not experienced the same shortages or high rate increases to compensate for such shortages. The State of California is currently studying the situation and making plans to address the shortage of energy through conservation measures, facility expansions and other means.

Existing Consumption

Currently the proposed area to be redeveloped contains a mix of land uses including office (287,701 sf), theater (148,481 sf), restaurant (144,390 sf), retail (57,316 sf), and health club (40,934 sf). Based on a total demand analysis prepared by Syska and Hennessy, Inc. (**Appendix 15**), electrical energy consumed by the existing land uses at full occupancy is approximately 11,132,680 kWh (based on the Title 24 model). A percentage of the existing capacity serving the area around the Project site is allocated to the existing land uses. Development of the proposed Project would include the removal of all existing land uses, within the area to be redeveloped, prior to construction.

Energy Conservation

As part of Title 24 of the California Code of Regulations, new buildings are required to meet the State Building Energy Efficiency Standards for energy consumption. These standards apply to residential and non-residential development and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The standards are subject to change at the discretion of local government agencies, as long as they meet or exceed the standards set forth by Title 24. The local building efficiency standards are enforced through the building and safety department. Periodic changes to Title 24 have resulted in new construction being more energy efficient.

Threshold of Significance

Based upon criteria established in the City of Los Angeles Draft CEQA Thresholds Guidelines (1998), the proposed Project would result in a significant impact if:

- The Project would require new off-site energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities; and
- The needed infrastructure was not anticipated by adopted plans.

Project Impacts

The Project proposes to redevelop the existing uses with office (719,924), restaurant (30,527 sf), retail (18,318 sf) and cultural uses (10,178 sf). The consumption of energy from existing land uses will be subtracted from the proposed Project contribution as a means of accurately calculating the net change from the proposed Project. According to the total demand analysis (**Appendix 15**), the proposed Project would consume approximately 7,911,952 kWh of electrical energy (based on a Title 24 model). Development of the proposed Project would result in a net decrease of 3,220,728 kWh when compared to the existing land uses.

The LADWP has reviewed the proposed Project's load estimates and determined that no service problems are anticipated as a result of Project implementation.⁶⁰ The existing distribution system currently serving the subject property would be adequate to serve the demands of the proposed Project. The transformers would serve the proposed uses with 20,000 amps at 277/480 volt 3-phase power.

The proposed Project would result in an incremental decrease to the local and regional demand for electrical service. The decreased demand would result in a less than significant adverse impact on electrical resources.

Mitigation Measures

The proposed Project would result in a less than significant impact on energy resources. Nevertheless, the following mitigation measures would further reduce electrical demand:

- U-24** The proposed Project shall comply with the energy requirements set forth in Title 24 of the California Code of Regulations.
- U-25** The Project applicant shall consult with the LADWP regarding the implementation of energy conservation measures including:
- Built-in appliances, refrigerators, and space conditioning equipment that exceed the minimum efficiency levels mandated in the California Code of Regulations.
 - High efficiency air conditioning controlled by a computerized energy management system in the office and retail spaces.
 - Circulation of ventilation air from high-priority to low-priority areas before being exhausted thereby decreasing the volume of ventilation air required.
 - Ensure that buildings are well sealed to prevent outside air infiltrating and increasing interior space conditioning loads.
 - Performance check the installed space conditioning system (to be completed by the developer/installer) prior to issuance of the certificate of occupancy to ensure that energy efficiency measures incorporated into the Project operate as designed.
 - Design window systems to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.
 - Install fluorescent and high intensity discharge (HID) lamps, which give the highest light output per watt of electricity consumed wherever possible, including exterior fixtures.
 - Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
 - Control HVAC and lighting mechanical systems with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied areas.

Significant Project Impacts After Mitigation

The proposed Project would consume less energy than the existing uses; therefore the Project would not result in an impact on electrical resources. Implementation of the mitigation measures set forth in this section would further reduce impacts and conserve energy.

⁶⁰ Source: Thomas Lira, Los Angeles Department of Water and Power, 2001.

Cumulative Impacts

Implementation of all related projects would result in the consumption of approximately 46,245,874 kWh per year. Calculation of this number is based upon generation rates obtained from the South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, Table A9-11-A, Electricity Usage Rate, as shown in **Table V.N.5-1**. The addition of the proposed Project would decrease the annual energy consumption to 43,025,146 kWh. The electrical load imposed by the proposed Project and the related project list is within the capacity of the LADWP. All projects included under the related project list would be required to incorporate energy conservation measures into their design and function, and no shortfalls in service area growth are expected by the LADWP. Therefore, cumulative impacts on the provision of electrical services are anticipated to be less than significant.

Table V.N.5-1
Energy Consumption from Related Projects

	Use	Consumption Rate (kWh/unit/year)	Total Energy Consumed (kWh/year)
1.	770,000 sf office	12.95/sf	9,971,500
	21,000 sf retail	13.55/sf	284,550
2.	UCLA		
	2000 beds Southwest Campus Housing (1)	5,626.5/du	5,626,500
	296,700 sf Northwest Campus Phase II	11.55/sf	3,426,885
	1,500 Space Intramural Field Parking	N/A	N/A
	191,900 sf Physics and Astronomy Building	11.55/sf	2,216,445
	95,000 sf Luck Research Center	11.55/sf	1,097,250
	California NanoSystems Institute*	N/A	N/A
	1,000 sf Health Science Seismic Renovation	11.55/sf	11,550
3.	8,912 sf Whole Foods Supermarket	13.55/sf	120,758
4.	115,000 sf Shopping Center	13.55/sf	1,558,250
	350 du Apartments	5,626.5/du	1,969,275
5.	105 du Condominium	5,626.5/du	590,783
6.	6 pu Gas Station*	N/A	N/A
7.	74,653 sf Office Building	12.95/sf	966,756
8.	Fast Food Restaurant w/Drive Thru*	N/A	N/A
9.	360,000 sf Fox Studio Expansion	10.5/sf	3,780,000
10.	14,800 sf High School Building Renovation	11.55/sf	170,940
11.	Private School*	12.95/sf	N/A
12.	7,600 sf Office	12.95/sf	98,420
13.	74,000 sf Office	12.95/sf	958,300
14.	168,000 sf Office	12.95/sf	2,175,600
15.	34 du Condominium	5,626.5/du	191,301
16.	64 du Senior Housing	5,626.5/du	360,096
17.	Convenience Market*	N/A	N/A
18.	34,000 sf Cultural Center	4.35/sf	147,900
19.	20 du Condominium	5,626.5/du	112,530
20.	5,000 sf Retail	13.55/sf	67,750
21.	15,000 sf Retail	13.55/sf	203,250
22.	28,300 sf Office	12.95/sf	366,485
	16,700 sf Retail	13.55/sf	226,285
23.	82,000 sf Office	12.95/sf	1,061,900
	38,000 sf Shopping Center	13.55/sf	514,900
24.	80 du Senior Housing	5,626.5/du	450,120
25.	16 du Condominium	5,626.5/du	90,024
26.	23 du Condominium	5,626.5/du	129,410
27.	32,000 sf Medical Office	12.95/sf	414,400
28.	133 rm Hotel*	9.95/sf	N/A
29.	16 du Condominium	5,626.5/du	90,024
30.	152,646 sf Retail Office	13.55/sf	2,068,353
31.	10 du Condominium	5,626.5/du	56,265
32.	41,500 sf Office	12.95/sf	537,425
33.	23 du Condominium	5,626.5/du	129,410
34.	10 du Condominium	5,626.5/du	56,265
35.	6 du Condominium	5,626.5/du	33,759

Table V.N.5-1 (Cont.)
Energy Consumption from Related Projects

	Use	Consumption Rate (kWh/unit/year)	Total Energy Consumed (kWh/year)
36.	15,000 sf Retail	13.55/sf	203,250
	15,000 sf Office	12.95/sf	194,250
37.	4,900 sf Commercial/Retail	13.55/sf	66,395
38.	2.5 Miles Santa Monica Blvd Transit Project*	N/A	N/A
39.	71,000 sf Westfield Shoppingtown Century City	13.55/sf	962,050
40.	-10,000 sf Commercial	13.55/sf	-135,500
	19 du Condominium	5626.5/du	106,904
41.	85,367 sf Office	12.95/sf	1,105,503
42.	122,200 sf Harvard Westlake Middle School	11.55/sf	1,411,410
43.	6,711 trips CCNSP Replacement Trips*	N/A	N/A
		Total	46,245,874
		Net Project Consumption	-3,220,728
		Cumulative Total	43,025,146
* Site of use not available.			
Source: South Coast Air Quality Management District, CEQA Air Quality Handbook, April 1993, Table A9-11-A, Electricity Usage Rate			

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.⁶¹ 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.

⁶¹ 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.⁶² 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

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

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.

⁶² 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 PM₁₀. This alternative would eliminate a less than significant

impact to PM₁₀ 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.

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
Total	1,276,488

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 study⁶³ for the All Office Alternative, the exact impact is unknown. This EIR will take the conservative view and

⁶³ 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.

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
Total		926,750

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 study⁶⁴ 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.

⁶⁴ 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.

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.

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
Total	500,000

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 study⁶⁵ for the Reduced Density Alternative, the exact impact is unknown. This EIR will take the

⁶⁵ 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.

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.

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.

VII. SIGNIFICANT ENVIRONMENTAL EFFECTS AND IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126(b) requires that an EIR discuss significant environmental effects that cannot be avoided if the proposed project is implemented. Based upon the analysis in Chapter V. Environmental Impact Analysis, with implementation of mitigation measures, the project will not result in a significant environmental effect with regard to the issues analyzed herein except for potentially significant construction air quality and noise impacts. (Also, see **Table VI-3** in the Alternatives Section, which summarizes Project impact conclusions by environmental impact category.)

CEQA Guidelines Section 15126(c) further requires that an EIR discuss irreversible environmental changes due to the proposed project. Irreversible environmental changes will occur as a result of project implementation. The proposed project would irreversibly modify the existing underutilized site through demolition of the existing structures and construction of new ones. The site has been committed to urban use for many years, and the proposed Project uses are consistent with City planned land uses for the site, as evidenced in the Century City North Specific Plan. Thus, development of the site is not considered a new, or significant new, commitment to urban development and does not represent the conversion of undeveloped land.

Construction of the Project will require the consumption of natural resources and renewable and non-renewable materials, including building materials (e.g., wood and metal) and fossil fuels (e.g., gasoline, diesel fuel, and natural gas). Once operational, the Project uses will require consumption of natural resources and renewable and non-renewable materials such as electricity, natural gas, potable water, and fossil fuels for Project-generated vehicle trips.

The commitment of resources outlined above and the levels of consumption associated with the Project are consistent with planned future development within the City of Los Angeles. Moreover, the use of resources represents a very small percentage of the resources to be utilized by development Citywide. Additionally, the Project provides public benefits, such as a reduction in the number of trips generated by the subject property. Therefore, there is no particular justification for avoiding or delaying the continued commitment of these resources.

VIII. GROWTH INDUCING IMPACTS

A. HOW THE PROJECT COULD FOSTER GROWTH

Section 15126(d) of the CEQA Guidelines requires that an EIR "discuss the growth inducing impact of the proposed project, including "ways in which the proposed Project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment."

The Project is not expected to generate growth in the area beyond the proposed Project site. The construction of the proposed 778,947 square feet of office, restaurant, retail and cultural uses will result in an increase in short-term construction and long-term employment opportunities. While the Project would create new job opportunities, the City of Los Angeles and surrounding areas include a large employment base. The jobs created are professional level jobs that require an educated work force, commensurate with the West Los Angeles/Beverly Hills location. Therefore, employees could be found in nearby areas. Further, the site is very accessible from area roadways and by mass transit (buses). It is not expected that any significant number of employees will move to the area because of the Project. No significant growth inducing impact would occur. Short-term construction jobs are not anticipated to induce unanticipated new population growth, because of the short-term nature of the construction process.

It is anticipated that the proposed Project will be adequately serviced by existing extensions of the electrical, water, sewer and natural gas utility systems existing on or near the Project site. No additional infrastructure of this nature would be constructed that could generate additional population growth in Century City.

The proposed Project is a redevelopment of existing office, theater, restaurant, retail and health club uses with office, restaurant, retail and cultural uses. The proposed use of the site is consistent with uses in the surrounding area and will not introduce new land uses that could induce significant changes to the surrounding area. Many of the parcels in the surrounding area are more intensely developed. High-rise structures currently exist immediately to the north, east and west of the Project site. Because the Project is similar to/compatible with surrounding structures, both in terms of use, size and architectural character, it would not encourage or contribute to pressures for redevelopment or alternative types of development in the area. Thus, the Project would not encourage unexpected growth and development that is inconsistent with the CCNSP.

The Project would physically and economically revitalize a portion of Century City that has been underutilized. Construction of the Project will create short-term construction jobs, as well as permanent jobs associated with the proposed elements of the Project and with the maintenance and management of the Project. In this regard, the Project would further the goals of the Specific Plan. Although the proposed Project inherently represents growth within Century City, such growth is not outside the scope of what has been anticipated and planned for in the Specific Plan area. Thus, no significant growth inducing impacts are anticipated.

B. CUMULATIVE DEVELOPMENT IMPACTS

The related projects (see Section IV, Environmental Setting) are also infill projects that will similarly add to the physical and economic revitalization of Century City and the surrounding area. Cumulative impacts relating to each environmental issue discussed in this EIR are addressed under those individual sections (see Section V, Environmental Impact Analysis). The City will require the preparation of an EIR for those related projects that the City anticipates will have potentially significant environmental impacts. Those EIRs must similarly discuss cumulative impacts and growth inducing effects. Individual project mitigation measures may be required in order to reduce environmental impacts.

Implementation of the proposed Project would result in the generation of 6,711 Replacement Trips that could be used for development within the CCNSP. The Replacement Trips could be used for new development on one of the few remaining undeveloped properties, or for redevelopment or addition to an existing underutilized property. Generation of the Replacement Trips could be viewed as a growth inducing impact. However, these Trips were included as baseline Trips generated by existing development under the CCNSP. Therefore, associated impacts have been anticipated and planned for in local and regional growth calculations.

This Project and the related projects, including Replacement Trip project(s), are not expected to generate unwanted or unplanned growth inducing effects. On the contrary, the City's General Plan Framework favors infill development, and the continued development of vital, Regional Centers such as Century City to provide for high-intensity centers, consistent with the preservation and protection of low-density, single-family residential areas from encroachment by other types of uses. Such land use arrangements are generally considered to have less of an effect on the environment by preserving unplanned or premature lands from development on the urban fringe or in more remote and rural locations.

IX. MITIGATION MONITORING PROGRAM

This Mitigation Monitoring Plan (MMP) has been prepared in accordance with Public Resources Code Section 21081.6, which requires a Lead or Responsible Agency that approves or carries out a project where an EIR has identified significant environmental effects to adopt a “reporting or monitoring program for the changes to the project which it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment.” The City of Los Angeles is the Lead Agency for the proposed Project.

This MMP is designed to monitor implementation of all feasible mitigation measures as identified in the Draft EIR for the proposed Project. Mitigation measures are indicated below and are numbered consistent with the relevant section numbering provided in the Draft EIR. Each mitigation measure is listed and categorized by topic with an accompanying discussion of the following:

- The phase of the Project during which the mitigation measure should be monitored (i.e., prior to issuance of a building permit, construction, or occupancy);
- The enforcement agency (i.e., the agency with the authority to enforce the mitigation measure); and
- The monitoring agency (i.e., the agency which monitors compliance and implementation of the required mitigation measure).

The project Applicant shall be obligated to provide certification prior to the issuance of site or building plans that compliance with the required mitigation measures has been achieved. All departments listed below are within the City of Los Angeles unless otherwise noted. The entity responsible for the implementation of all mitigation measures shall be the project Applicant unless otherwise noted.

AESTHETICS**Visual Qualities**

AE-1 All open areas not used for buildings, driveways, parking areas, or walkways shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the Los Angeles Department of City Planning.

Monitoring Phase: Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AE-2 The owners shall maintain the Project site to be clean and free of debris and rubbish and promptly remove any graffiti from walls, pursuant to Municipal Code Sections 91.810F, 91.8904.1, and 91.1707-E.

Monitoring Phase: Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

Lighting and GlareLighting

AE-3 Exterior lighting shall be designed to shield and direct illumination to the Project site, and/or areas, which do not include light-sensitive uses.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AE-4 The Project shall not install flashing, moving, strobe, or blinking outdoor lights along the western and southern boundaries of the Project site or on the south-facing exterior wall of the proposed building.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AE-5 Landscape plans shall utilize large canopy trees particularly along the southern perimeter of the Project site to the extent feasible.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

Glare

AE-6 The exterior of the proposed building shall be constructed of materials such as high-performance tinted non-mirrored glass, painted metal panels and pre-cast concrete or fabricated wall surfaces.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AIR QUALITY
1. Emissions

AQ-1 The Project shall comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Reasonably Available Control Measures (RACM) for all fugitive dust sources, and the Air Quality Management Plan (AQMP), which identifies Best Available Control Measures (BACM) and Best Available Control Technologies (BACT) for area sources and point sources, respectively.

Monitoring Phase: Construction
Enforcement Agency: SCAQMD
Monitoring Agency: Department of Building and Safety

AQ-2 All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

Monitoring Phase: Construction
Enforcement Agency: SCAQMD
Monitoring Agency: Department of Building and Safety

AQ-3 The applicant or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.

Monitoring Phase: Construction
Enforcement Agency: SCAQMD
Monitoring Agency: Department of Building and Safety

AQ-4 All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AQ-5 All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AQ-6 All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AQ-7 General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

AQ-8 The Project applicant shall be required to coordinate with a representative of the Santa Monica Transit Parkway Project regarding construction-related activities.

Monitoring Phase: Construction
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering

BIOLOGICAL RESOURCES

BR-1 Prior to the issuance of a grading permit, a plot plan prepared by a reputable arborist, indicating location, size, type, and condition of all existing trees on the site shall be submitted for approval to the Department of City Planning and the Street Tree Division of the Bureau of Street Services. All trees in the public right-of-way shall be subject to the current Street Tree Division Standards. The plan shall contain measures recommended by the tree expert for the preservation of as many trees as possible. Mitigation measures such as replacement by a minimum of 24-inch box trees in the parkway and on the site on a 1:1 basis, shall be required for unavoidable loss of trees greater than 12" diameter at breast height (DBH) on the site, and to the satisfaction of the Street Tree Division of the Bureau of Street Services and the Advisory Agency.

Monitoring Phase: Prior to issuance of a grading permit
Enforcement Agency: Department of City Planning, and Street Tree Division of the Bureau of Street Services
Monitoring Agency: Department of City Planning

GEOLOGY

G-1 To reduce seismic risks, Project structures shall be designed and built in conformance with the current City of Los Angeles Uniform Building Code at the time of the building permit. Information about ground motion parameters included in the site specific geotechnical report shall be used as input for seismic design of the proposed Project.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

HAZARDOUS MATERIALS

HHM-1 Prior to issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant stating that all asbestos containing materials (ACM) present in the building has been abated in compliance with South Coast Air Quality Management District's Rule 1403 as well as all other applicable local, state, and federal rules and regulations.

Monitoring Phase: Prior to issuance of a demolition permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

HHM-2 Hazardous materials generated as a result of routine maintenance of equipment shall be disposed of in accordance with legal disposal procedures.

Monitoring Phase: Operation
Enforcement Agency: Department of Building Safety
Monitoring Agency: Department of Building and Safety

HHM-3 All contractors and construction companies shall be advised of the potential risk associated with subsurface methane in soil gas below the Project site by the applicant. Although soil gas monitoring did not indicate that hydrogen sulfide is a potential problem at the Project, this gas can be associated with methane gas and should be monitored during construction operations as a potential health threat and an odor concern.

Monitoring Phase: Prior to issuance of building permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

HHM-4 The contractors and construction companies shall develop a Health and Safety Plan that addresses combustible gas and hydrogen sulfide concerns and procedures they intend to institute to minimize potential danger from explosion or exposure in the event elevated concentrations are encountered. The Plan shall comply with all applicable environmental health and safety laws and indicate, at minimum, the following:

- Precautions that will be taken to arrest any spark generation or ignition sources during construction procedures that penetrate the concrete floor.
- Monitoring equipment and specifications should be included for continuous monitoring of methane concentrations and comparison to levels of concern such as Permissible Exposure Levels (PELs), Threshold Limit Values (TLVs), or concentrations Immediately Dangerous to Life and Health (IDLH) in the breathing zone. In addition, methane concentrations should be regularly monitored and compared against the Lower Explosive Level (LEL). Contingency responses should be established for each scenario.
- Specifications should be included for use of the garage ventilation system, and any additional systems, to assure maximum air exchanges, as necessary, within the facility during construction operations.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

HHM-5 The cracks in the floor and seams that open below the concrete floor shall be sealed if deemed necessary by the Department of Building and Safety to minimize gas migration into the garage.

Monitoring Phase: Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

HHM-6 The operation of the ventilation system shall be modified, if determined necessary by the Department of Building and Safety, to avoid the development of negative pressures within the building during power outages.

Monitoring Phase: Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

HHM-7 Floor sections on Level F around new pilings shall be sealed at the completion of construction to prevent gas migration into the garage from the sub-surface.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

HHM-8 All cross connections between the Level F sub-drain piping and other systems (i.e. the storm drain and ventilation systems) shall be identified and eliminated.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

HHM-9 Prior to issuance of a building permit, the building shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. The owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Building and Safety and Fire Department
Monitoring Agency: Department of Building and Safety

HYDROLOGY

H-1 The Project shall comply with the requirements of the NPDES permit for stormwater discharge and with guidelines and policies of the Regional Water Quality Control Board, EPA and local agencies regarding water quality.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: RWQCB
Monitoring Agency: Bureau of Engineering

H-2 The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

Monitoring Phase: Construction
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering

- H-3** Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- Monitoring Phase:** Prior to issuance of a building permit
Enforcement Agency: Bureau of Sanitation
Monitoring Agency: Bureau of Sanitation
- H-4** Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
- H-5** Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Bureau of Sanitation
Monitoring Agency: Bureau of Sanitation
- H-6** Reduce and recycle waste, including oil and grease, to the extent feasible.
- Monitoring Phase:** Operation
Enforcement Agency: Bureau of Sanitation
Monitoring Agency: Bureau of Sanitation
- H-7** Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
- H-8** All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
- Monitoring Phase:** Prior to issuance of a building permit
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering

H-9 The legibility of signs and stencils discouraging illegal dumping must be maintained.

Monitoring Phase: Operation
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering

H-10 Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.

Monitoring Phase: Construction and Operation
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering

H-11 Storage areas must be paved and sufficiently impervious to contain leaks and spills.

Monitoring Phase: Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

H-12 Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.

Monitoring Phase: Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

H-13 The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

Monitoring Phase: Operation
Enforcement Agency: Department of City Planning
Monitoring Agency: Bureau of Engineering

H-14 Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the Department of City Planning's public counter or from the City's website at www.lastormwater.org.

Monitoring Phase: Operation
Enforcement Agency: Department of City Planning
Monitoring Agency: Bureau of Engineering

NOISE

N-1 All exterior construction and demolition activities located within 500 feet of a residence or hotel shall occur between 7:00 am and 6:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday, pursuant to the City of Los Angeles Municipal Code Section 41.40.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

N-2 Construction equipment shall use noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise. Construction operations shall be staged as far from sensitive uses as feasible.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

N-3 Maintain all sound reducing devices and restrictions throughout the construction period.

Monitoring Phase: Construction
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

N-4 Locate any delivery, truck loading or trash pickup areas as far from noise sensitive land uses as possible to the extent feasible.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

N-5 The project shall comply with the City of Los Angeles Municipal Code Chapter XI, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

Monitoring Phase: Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

N-6 The project sponsor must comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.

Monitoring Phase: Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

PUBLIC SERVICES**Fire Protection**

FP-1 Project building plans shall include the submittal of a plot plan for approval by the Fire Department either prior to the recordation of the final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; and all structures must be within 300 feet of an approved fire hydrant.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-2 The applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features appropriate to the design of the Project.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-3 Construction of new public or private roadway in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-4 The Project shall utilize standard cut-corners on all turns, if applicable.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-5 Fire Department access shall remain clear and unobstructed during demolition.

Monitoring Phase: Construction

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-6 If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-7 No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-8 If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-9 No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway, of an improved street, access road, or designated fire lane, unless otherwise approved.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-10 Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-11 Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot unless otherwise approved.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

FP-12 The Project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Fire Department

Monitoring Agency: Fire Department

Police Protection

PS-1 The applicant shall consult with the Los Angeles Police Department Crime Prevention Unit on crime prevention features appropriate to the design of the Project.

Monitoring Phase: Prior to issuance of a building permit

Enforcement Agency: Police Department

Monitoring Agency: Police Department

PS-2 Entryways, elevators, lobbies, and parking areas shall be well illuminated and designed with a minimum of visual dead space to eliminate areas of concealment.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Police Department
Monitoring Agency: Police Department

PS-3 Upon completion of the Project, the owner shall provide the West Los Angeles Area Commanding Officer with a diagram of each portion of the property, including access routes and additional information that might facilitate police response.

Monitoring Phase: Prior to issuance of a certificate of occupancy
Enforcement Agency: Police Department
Monitoring Agency: Police Department

TRANSPORTATION/ TRAFFIC

T-1 The Project shall implement a Transportation Demand Management (TDM) program as set forth in Appendix 18 and in compliance with all TDM/trip reduction ordinances of the City of Los Angeles. The TDM program shall be designed and operated to encourage ridesharing, transit usage and bicycle usage among Project employees, with the goal of achieving Project vehicular trip generations of 996 trips or less during the AM peak hour and 1,119 trips less during the PM peak hour. Among the services and amenities expected to be included in the TDM program are designated carpool and vanpool parking spaces; bicycle parking, clothes lockers and related facilities; centralized ridesharing and public transit information; on-site sale of transit passes; and participation in the Century City Transportation Management Organization that is to be developed by the Constellation Place project. The Program includes financial penalties for non-compliance and the ability to implement additional or other measures as necessary should it be determined that the Project has not attained the above trip generation targets. See Appendix 18 and LADOT Letter dated July 11, 2002 in Appendix 13. The final TDM program, including a monitoring procedure, will be refined in consultation with LADOT.

Monitoring Phase: Prior to issuance of building permit
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation

T-2 A Project construction traffic control plan will be developed, to the satisfaction of LADOT, including a designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction.

Monitoring Phase: Construction
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation

T-3 Construction employees commuting to the Project site shall not be allowed to park on public streets.

Monitoring Phase: Construction
Enforcement Agency: Department of Transportation
Monitoring Agency: Department of Transportation

UTILITIES AND SERVICE SYSTEM
Stormwater

- U-1** The Project shall comply with NPDES requirements of the existing stormwater drain permit along with the preparation of a stormwater plan and other applicable filings prior to construction.
- Monitoring Phase:** Prior to construction
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering
- U-2** During construction, drainage of the Project site shall be disposed of in a manner satisfactory to the City Engineer and the Regional Water Quality Control Board.
- Monitoring Phase:** Construction
Enforcement Agency: Bureau of Engineering and RWQCB
Monitoring Agency: Bureau of Engineering and RWQCB
- U-3** The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development of Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering
- U-4** Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- Monitoring Phase:** Prior to issuance of a building permit
Enforcement Agency: Bureau of Sanitation
Monitoring Agency: Bureau of Sanitation
- U-5** Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
- U-6** Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Bureau of Sanitation
Monitoring Agency: Bureau of Sanitation

- U-7 Reduce and recycle waste, including oil and grease, to the extent feasible.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Bureau of Sanitation
Monitoring Agency: Bureau of Sanitation
- U-8 Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
- U-9 All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING - DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.
- Monitoring Phase:** Prior to issuance of a building permit
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering
- U-10 The legibility of signs and stencils discouraging illegal dumping must be maintained.
- Monitoring Phase:** Operation
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering
- U-11 Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Bureau of Engineering
Monitoring Agency: Bureau of Engineering
- U-12 Storage areas must be paved and sufficiently impervious to contain leaks and spills.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety
- U-13 Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.
- Monitoring Phase:** Construction and Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Building and Safety

- U-14** The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

Monitoring Phase: Operation
Enforcement Agency: Department of City Planning
Monitoring Agency: Bureau of Engineering

- U-15** Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the Department of City Planning's public counter or from the City's website at www.lastormwater.org.

Monitoring Phase: Operation
Enforcement Agency: Department of City Planning
Monitoring Agency: Bureau of Engineering

Water Supply

- U-16** The proposed Project shall use automatic sprinkler systems for landscape irrigation, which are adjusted on a seasonal basis to operate during hours where water loss due to evaporation would be minimized.

Monitoring Phase: Operation
Enforcement Agency: Department of Water and Power
Monitoring Agency: Department of Water and Power

- U-17** Where feasible, reclaimed water shall be used to irrigate landscaped areas.

Monitoring Phase: Operation
Enforcement Agency: Department of Water and Power
Monitoring Agency: Department of Water and Power

- U-18** The proposed Project shall comply with all sections of the City of Los Angeles' Water Conservation Ordinance (Ordinance No. 166,080) and Xeriscape Ordinance, as applicable.

Monitoring Phase: Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Water and Power

- U-19** The proposed Project shall use lower-volume water faucets and water saving showerheads in all construction.

Monitoring Phase: Operation
Enforcement Agency: Department of Water and Power
Monitoring Agency: Department of Water and Power

U-20 The proposed Project shall use plumbing fixtures that reduce potential water loss from leakage due to excessive wear of washers.

Monitoring Phase: Operation
Enforcement Agency: Department of Water and Power
Monitoring Agency: Department of Water and Power

U-21 The proposed Project shall incorporate water conservation measures as appropriate and required by the City of Los Angeles Department of Building Ordinances (No. 163,532, No. 164,093, and No. 165,004) and subsequent amendments, which include the installation of low-flow water fixtures and xeriscape.

Monitoring Phase: Operation
Enforcement Agency: Department of Building and Safety
Monitoring Agency: Department of Water and Power

Solid Waste

U-22 The Project applicant shall salvage and recycle construction and demolition materials to the maximum extent feasible. Documentation of a recycling program will be provided to the City of Los Angeles Department of Public Works.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Public Works
Monitoring Agency: Bureau of Sanitation

U-23 The Project applicant shall institute an on-site recycling/conservation program to reduce the volume of solid waste going to landfills in compliance with the City's goal of a 50% reduction in the amount of waste going to landfills.

Monitoring Phase: Operation
Enforcement Agency: Bureau of Sanitation
Monitoring Agency: Bureau of Sanitation

Electricity

U-24 The proposed Project shall comply with the energy requirements set forth in Title 24 of the California Code of Regulations.

Monitoring Phase: Prior to issuance of a building permit
Enforcement Agency: Department of Water and Power
Monitoring Agency: Department of Water and Power

U-25 The Project applicant shall consult with the LADWP regarding the implementation of energy conservation measures including:

- Built-in appliances, refrigerators, and space conditioning equipment that exceed the minimum efficiency levels mandated in the California Code of Regulations.
- High efficiency air conditioning controlled by a computerized energy management system in the office and retail spaces.
- Circulation of ventilation air from high-priority to low-priority areas before being exhausted thereby decreasing the volume of ventilation air required.
- Ensure that buildings are well sealed to prevent outside air infiltrating and increasing interior space conditioning loads.

- Performance check the installed space conditioning system (to be completed by the developer/installer) prior to issuance of the certificate of occupancy to ensure that energy efficiency measures incorporated into the Project operate as designed.
- Design window systems to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.
- Install fluorescent and high intensity discharge (HID) lamps, which give the highest light output per watt of electricity consumed wherever possible, including exterior fixtures.
- Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
- Control heating, ventilation and air conditioning (HVAC) and lighting mechanical systems with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied areas.

Monitoring Phase: Operation
Enforcement Agency: Department of Water and Power
Monitoring Agency: Department of Water and Power

X. PREPARERS OF THE EIR, CONTACTS AND REFERENCES

A. PREPARERS OF THE EIR

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This document was prepared under the direction and approval of the City of Los Angeles. A team of private consultants, lead by Envicom Corporation (see below) prepared the document for the City, and the City by its approval accepts the document as its own.

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- City of Los Angeles Department of Public Works
- City of Los Angeles Department of Building and Safety
- City of Los Angeles Department of City Planning
- City of Los Angeles Department of Recreation and Parks
- City of Los Angeles Department of Transportation (LADOT)
- City of Los Angeles Department of Water and Power (LADWP)
- City of Los Angeles Fire Department (LAFD)
- City of Los Angeles Police Department (LAPD)
- Los Angeles Regional Water Quality Control Board (RWQCB)
- Los Angeles Unified School District (LAUSD)

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ACRONYM	TERMS
ACM	asbestos containing material
ADT	average daily trips
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
AST	Above-ground storage tank
BACM	Best Available Control Measures
BACT	Best Available Control Technologies
Basin	South Coast Air Basin
BMP	Best Management Practices
BTEX	Benzene, Toulene, Ethylbenzene, and Xylenes
CAA	Federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CATGP	Cumulative Automobile Trip Generation Potential
CCAA	California Clean Air Act
CCNSP	Century City North Specific Plan
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CDM	Camp Dresser and McKee, Inc.
CDMG	California Division of Mines and Geology
CDOG	California Division of Oil and Gas
CEQA	California Environmental Quality Act
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
CIWMB	California Integrated Waste Management Board
CMP	Congestion Management Program
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CWA	Clean Water Act
CWC	California Water Code
dBA	A-weighted decibel scale
DWR	Department of Water Resources
EAD	City of Los Angeles Environmental Affairs Department
EIR	Environmental Impact Report
EPA	United States Environmental Protection Agency
ERNS	Emergency Response Notification System
FAA	Federal Aviation Administration
FAR	floor area ratio
FHWA	Federal Highway Administration
gpd	gallons per day
gsf	gross square feet
HID	high intensity discharge
HRG	Historic Resources Group
HVAC	heating, ventilation, and air conditioning
HWIS	Hazardous Waste Information System
IDLH	Immediately Dangerous to Life and Health

ACRONYM	TERMS
IPD	International Parking Design, Inc.
ITE	Institute of Transportation Engineers
LAA	Los Angeles Aqueduct
LACMTA	Los Angeles County Metropolitan Transportation Authority
LADBS	Los Angeles Department of Building and Safety
LADOT	Los Angeles Department of Transportation
LADWP	Los Angeles Department of Water and Power
LAFD	Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	Los Angeles Police Department
LAUSD	Los Angeles Unified School District
LEL	Lower Explosive Level
LEQ	Equivalent Noise Level
LOS	level of service
LUST	leaking underground storage tank
mgd	million gallons per day
mpg	miles per hour
MTA	Metropolitan Transportation Authority
MWD	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standard
National Register	National Register of Historic Places
NO ₂	nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NOX	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
O ₃	ozone
OPR	Office of Planning and Research
PCB	Polychlorinated Biphenyls
PEL	Permissible Exposure Level
PM	particulate matter
PM ₁₀	coarse particulates
ppm	Parts per million
PRC	Public Resources Code
RACM	Reasonably Available Control Measures
RCRA	Resource Conservation and Recovery Act
ROG	Reactive Organic Gases
ROW	right-of-way
RWDI	Rowan Williams Davies and Irwin, Inc.