



I. EXECUTIVE SUMMARY

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In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15123, this Environmental Impact Report (EIR) contains a brief summary of the proposed actions and consequences of the New Century Plan. More detailed information regarding the project and its potential environmental effects are provided in the following sections of this EIR.

As described in Sections 15089 and 15132 of the Guidelines for the California Environmental Quality Act (CEQA Guidelines), the lead agency must prepare a Final EIR before approving the project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies. Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a revised summary, corrections and additions to the Draft EIR, a list of persons, organizations, and agencies commenting on the Draft EIR, responses to comments, and a Mitigation Monitoring and Reporting Program.

This Final EIR is intended to be a companion to the March 2008 Draft EIR, which is incorporated by reference and bound separately. (Refer to Volumes I through V of the Draft EIR). This Final EIR is organized into four main sections and appendices, as follows:

Section I. Executive Summary—This section provides an overview and background of the proposed project and its potential impacts.

Section II. Corrections and Additions to the Draft EIR—This section provides a list of revisions that have been made to the Draft EIR, based on comments received from the public and agencies, and other items requiring updating and/or corrections.

Section III. Responses to Written Comments—This section presents topical responses and a matrix of the parties that commented on the Draft EIR and the issues that they raised. This matrix is followed by each comment within the comment letter with a corresponding response.

Section IV. Mitigation Monitoring and Reporting Program (MMRP)—This section provides the full MMRP for the project. The MMRP lists all of the proposed mitigation measures by environmental topic, and identifies for each of the measures the applicable enforcement agency, monitoring agency, monitoring phase, monitoring frequency, and action indicating compliance.

Appendices—These appendices are technical appendices to the environmental analyses provided in Section II, Corrections and Additions, of this Final EIR.

Appendix A. Traffic Technical Appendix—This appendix is a technical appendix to the environmental analysis provided in Section II, Corrections and Additions, of this Final EIR.

Appendix B. Copies of Comment Letters—This appendix includes comment letters in the form that they were submitted.

Appendix C. Proposed Amendment to the Century City North Specific Plan—This appendix provides the full language of the proposed amendments to the Century City North Specific Plan.

Appendix D. Los Angeles City Planning Department Trip Covenant to Document Conversion of Drive-Through Bank to Office Commercial Use at 1930 Century Park West Memorandum and Replacement Trips Covenant for 1930 Century Park West—This appendix provides that the entire bank floor area should be used in calculating trips for a “drive-through bank.”

1. PROPOSED PROJECT

a. Project Location

The approximately 22-acre project site consists of the existing Westfield Century City Shopping Center at 10250 Santa Monica Boulevard, and two adjacent properties addressed as 1801 Avenue of the Stars and 1930 Century Park West. The site is located in the West Los Angeles Community Plan area of the City of Los Angeles, approximately 8.5 miles from downtown Los Angeles and 6 miles from the Pacific Ocean. More specifically, the site is located within the Century City community and is within the Century City North Specific Plan (CCNSP) area. The project site is bounded by Santa Monica Boulevard to the north, Avenue of the Stars to the east, Constellation Boulevard to the south, and Century Park West to the west.

The site lies within a highly urbanized area generally characterized by mid- to high-rise office buildings, hotels, entertainment, and residential uses. Commercial and multi-family uses and the Los Angeles Country Club are located to the north of the project site along Santa Monica Boulevard, with single-family residential uses further to the north of these uses. High-rise office buildings, hotels and parking structures, including the 36-story MGM tower, the 19-story Century Plaza Hotel, and the 39-story Fox Plaza building are located to the south of the site. Mid- and high-rise office buildings, including the 39-story AIG SunAmerica building, the two

23-story Watt Plaza towers and a 20-story office building, are located to the east of the project site. Single-family residential uses are located to the west of the Shopping Center across Century Park West. In addition, residential uses within mid- and high-rise buildings have been approved at other properties to the east and south of the project site. A Metropolitan Transportation Authority transit area is located to the south of the project site at Constellation Boulevard, just east of Century Park West.

b. Project Characteristics

The proposed project would create an integrated center within the community by providing a broad array of shopping and dining choices, entertainment opportunities, outdoor spaces and amenities. Specifically, existing buildings and the anchor stores, and outdoor areas within the Shopping Center would be reconfigured or renovated to provide for new retail and restaurant spaces, along with landscaping and open space amenities. In addition, the project would remove two existing office buildings that together comprise approximately 360,964 square feet adjacent to the Shopping Center, and replace them with new residential uses, Shopping Center uses, office uses and parking facilities, all of which would be physically integrated with the existing Shopping Center. Upon completion, an addition of an estimated 358,881 square feet of Shopping Center space, 106,523 square feet of new office uses and approximately 262 multi-family residential apartments or condominium units would be provided within the project site. The Shopping Center would have a sitewide total of 1,192,274 square feet of Shopping Center uses, including existing and proposed retail, restaurant, and cinema uses. When accounting for the existing commercial uses to be removed, the proposed project would result in a net increase of approximately 104,440 square feet of commercial uses. The proposed improvements would promote the future vitality of the Shopping Center and enhance Century City as a walkable community by providing options to live, play, work and shop in an area that is already an established employment hub. An overview of the primary components of the project is provided below.

(1) Proposed Shopping Center Improvements

The new buildings within the Shopping Center would consist of two to four levels of retail uses, integrated with other proposed uses and the existing Shopping Center buildings within the western and southern portions of the site. The existing three-story department store located in the southern-central portion of the site could be renovated and expanded to provide four levels of retail uses integrated with new adjacent retail space. In addition, a new building containing up to four levels of retail uses would replace the existing building located at 1801 Avenue of the Stars. This new building would be integrated with the existing Shopping Center. The lower levels of the new retail building would also include the lobby and other accessory spaces for the residential component, to be located on the upper floors of the building. The new commercial areas of the Shopping Center would have heights of up to approximately

75 feet above the plaza level, with the plaza height ranging from 7 to 11 feet above the adjacent street grades along Santa Monica Boulevard, Century Park West, Avenue of the Stars and Constellation Boulevard.¹

The Shopping Center would continue to feature indoor/outdoor facilities, with outdoor terraces, pedestrian walkways, and dining areas atop the existing semi-subterranean parking structure deck. While the project would add building density to the Shopping Center, the outdoor terraces, pedestrian circulation areas, and common spaces connecting contemporary structures and retail storefronts would promote a feeling of openness. The project design would combine massing techniques, modulated façades, landscaping, water features, public amenities, and building materials such as glass, stone, and other natural materials to establish an architectural design compatible with the scale, color, texture, and form of the overall character of Century City.

(2) Proposed Office Component

The project would include three floors of office space comprising approximately 106,523 square feet, located above the retail and restaurant space along Santa Monica Boulevard. When accounting for the existing office area to be removed, the project would result in a net decrease in office floor area when compared with existing conditions. The combined retail/office building would have a maximum height of 75 feet above the plaza level. The new office uses would have a separate circulation core that would include access to the rooftop parking area (described below), located to the south of the building.

(3) Proposed Residential Component

Residential uses would be developed with the new Shopping Center uses at 1801 Avenue of the Stars. The residential component would include up to 262 multi-family residential, apartment or condominium units housed within 42 of the upper 43 stories of the building. Amenities for the residential uses would be provided in one or two levels below the residential uses. The levels below the amenities levels would include building support (e.g., building service offices and lobbies) and mechanical areas. An additional floor for mechanical areas would be located on the top floor of the building and on top of the new retail uses. The proposed residential units would range in size from two to five bedrooms. These new residential uses would comprise a total of approximately 945,000 square feet of floor area, including the residential amenities. This new combined Shopping Center/residential building would be 49 stories with a maximum height of 579 feet as measured from the plaza level of the Shopping

¹ *Since the CCNSP requires that the heights of structures within the C2-IVL portion of the Shopping Center be measured from plaza level, the heights of other existing buildings within the Shopping Center have also been measured from plaza level to maintain consistency.*

Center (862.5 feet above mean sea level [amsl] and 587 feet above grade).² Similar to other high-rise buildings within the vicinity and in compliance with regulatory requirements, an emergency helipad would be provided on the rooftop.

The proposed residential amenities would include common open space and indoor recreational amenities on levels one and/or two of the residential tower (levels five and/or six if counting from the plaza level). The open space component would consist of a 46,000-square foot rooftop terrace located above the new retail uses at 1801 Avenue of the Stars. Additionally, private open spaces would be provided within individual units via a balcony.

(4) Parking and Access

The 1930 Century Park West building and an adjacent surface parking lot would be removed and replaced with an approximately 576-space parking structure for integrated use by Westfield Century City Shopping Center patrons. This parking facility would consist of five above-grade stories plus a rooftop parking level, and two existing subterranean levels. The parking facility at 1930 Century Park West would be approximately 45 feet in height as measured from the plaza level and with the proposed amendments to the Century City North Specific Plan would comply with the limitations of Very Limited Height District No. 1 (1VL), designated along the western portion of the site.

Rooftop parking would also be provided above some of the new Shopping Center buildings in the central and eastern portions of the site, with vehicular access from the existing semi-subterranean parking deck (Level A) via a ramp along the eastern side of the site. Pedestrian access from the rooftop parking area would be provided via a series of walkways connecting to the upper levels of the anchor store to the south, the retail uses to the northeast, and the proposed office uses to the north. Four levels of primarily subterranean parking would be provided below the residential and Shopping Center uses within the new building at 1801 Avenue of the Stars. Four levels of subterranean parking are already present at this location thus, a substantial amount of grading would not be required to expand and reconfigure this parking area. The majority of these spaces would be reserved for use by project residents and their guests and would be accessible via a designated secured driveway off Avenue of the Stars. In addition, some retail parking may be provided within the 1801 Avenue of the Stars subterranean parking structure.

² *An amendment to the CCNSP is proposed to formally define the Shopping Center as including 1801 Avenue of the Stars and 1930 Century Park West, together with 10250 Santa Monica Boulevard, and thereby treat all three properties as a unified site. As part of this amendment, the CCNSP would acknowledge that the heights of all buildings within the Shopping Center, including 1801 Avenue of the Stars and 1930 Century Park West, should be measured consistently from the plaza level.*

A total of approximately 4,529 parking spaces would be provided within the project site. Approximately 655 parking spaces would be provided for residents and their guests, approximately 213 parking spaces would be provided for the office uses and approximately 3,661 parking spaces would be provided for the Shopping Center uses. These spaces would be collectively located within the existing semi-subterranean parking levels below the Shopping Center, the new rooftop parking deck above the Shopping Center, the new above and below ground parking structure at 1930 Century Park West, and within the newly expanded and reconfigured subterranean parking structure at 1801 Avenue of the Stars.

Primary vehicular access to the existing semi-subterranean parking garage for the Shopping Center would continue to be provided from Santa Monica Boulevard via the main entry/exit driveway. The existing valet entrance and exit would also remain along Santa Monica Boulevard within the western portion of the Santa Monica Boulevard frontage. A new valet entrance and exit for the office uses and a drop-off entry and exit would be also provided along Santa Monica Boulevard further to the east. Existing driveways along Constellation Boulevard and Century Park West would also be maintained, with the exception of the existing office driveway to 1930 Century Park West, located along Constellation Boulevard within the western portion of the site, which would be removed. The new parking structure at 1930 Century Park West would include entry and exit driveways on Century Park West, which would represent the consolidation of two existing office driveways at this location. Access to the rooftop parking deck would be provided from the existing semi-subterranean parking levels below the Shopping Center.

Additionally, two separate driveways would be provided along Avenue of the Stars. One driveway would allow residents to access the residential-only parking at the 1801 Avenue of the Stars property, while a separate driveway would provide entry and exit access to parking for the office and Shopping Center uses. The new retail entry and exit driveway would be located in the same location as the existing 1801 Avenue of the Stars entry and exit driveway. An existing service drive that stretches from Constellation Boulevard to Santa Monica Boulevard along much of the eastern boundary of the project site and is partially below grade would continue to be available for service and delivery access. New below grade loading dock areas (on Parking Level B of the existing semi-subterranean parking area below the Shopping Center and Parking Level B of the new 1801 Avenue of the Stars parking structure) would be provided along this service driveway in order to serve the residential and Shopping Center uses in the northeastern portion of the site. Delivery access to existing loading docks on Parking Level B that service the retail, and grocery store uses in the central, southern, and western portions of the site would be maintained via Constellation Boulevard. In addition, the existing retail loading dock on Parking Level B within the southern portion of the site would be reconfigured for use by retail tenants, and the loading dock on Parking Level B within the southwestern portion of the site would also be expanded to accommodate loading and unloading activities for the existing dining terrace.

(5) Additional Project Features

The proposed project would be designed and built in accordance with the criteria of the Leadership in Energy and Environmental Design (LEED) program. At a minimum, the project would be designed and constructed to achieve the Silver level of the LEED Rating System established by the US Green Building Council (USGBC) to promote sustainability. LEED standards would be incorporated through measures that would reduce energy and water usage and thus reduce associated greenhouse gas (GHG) emissions.

The design of the proposed project conforms to the Urban Design Guidelines included in the Draft Greening of Century City Pedestrian Connectivity Plan (dated March 28, 2007) in both its large-scale planning and in specific, pedestrian-scale design decisions, in order to enhance the pedestrian connectivity and experience in Century City. Pedestrian zones that connect with transit improvements will include pedestrian amenities such as street furniture, bicycle racks, and pedestrian lighting within the project's larger open space network in order to enhance the pedestrian experience.

In order to enhance connections to existing and proposed mass transit systems, the project has reserved areas within the 1801 Avenue of the Stars portion of the site to provide for vertical circulation (e.g., elevators and escalators) and a street-level portal/ticketing area connecting to a future Metro subway station. In addition, a knock-out panel(s) has been designed within the tower's parking garage foundation near the corner of Santa Monica Boulevard and Avenue of the Stars to provide access to the future Metro subway station. This subway portal location would allow direct access to both the street level and to the Century City Specific Plan Pedestrian Corridor (located within the Westfield Century City Shopping Center plaza). This dual connection would help to activate and reinforce the pedestrian zones' connection to cafes, eateries, and retail amenities and would enhance and encourage non-vehicular transportation within the district.

A landscaping plan that would complement and enhance the existing character of the project site would also be implemented as part of the project. Throughout the mall concourses numerous planters with trees, shrubs, and other ornamental plantings would be located to provide shade as well as a continuous and varied planting and landscape spine throughout the project site, while at the same time demarcating districts and identifiable zones within the larger complex. Outside the Shopping Center, new street trees, palms, and specimens would be planted to enhance the quality of the pedestrian experience along Santa Monica Boulevard and to create a sense of place and arrival through the design of garden "rooms" such as a palm garden and others. Similar improvements would also be made along Avenue of the Stars and at the corner of Century Park West and Constellation Boulevard.

A signage program would also be implemented as part of the project in order to ensure that Shopping Center and related signage would be compatible with the architecture of the existing and proposed buildings. Proposed signage would be similar to existing conditions with new monument signs, building signs, wayfinding signs, parking entrance signs and wall signs. Signage would not exceed the allowable area totals (square feet) within the corresponding zone on each of the streets adjacent to the site. Proposed signage along Santa Monica Boulevard, Avenue of the Stars, and Constellation Boulevard would be illuminated to establish the continued presence of the retail, restaurant, and residential buildings in the context of Century City during the nighttime hours. However, no new illuminated signage would be visible from any adjacent R1 property to the west of Century Park West.

Project lighting along the exterior façades of the Shopping Center would consist of low-level lighting for architectural highlighting and security purposes. Security industry standard lighting would be installed at recommended locations including parking structures, pathway points, curbside queue areas, etc. Any pole-mounted light fixtures located on-site or within the adjacent public rights-of-way would be shielded and directed towards the areas to be lit and away from adjacent sensitive uses.

With regard to on-site security, current 24-hour on-site security personnel and equipment would be expanded as necessary depending on the anticipated day-to-day levels of activity. During each security shift, security personnel would continue to be assigned to foot patrol, bike patrol or golf cart patrol. Additional security programs (e.g., a computer-assisted Emergency Preparedness Incident Command System, additional closed-circuit television) would also be implemented to supplement the computer-assisted security programs currently maintained at the site.

(6) Project Construction

Construction of the project would occur in phases representing geographic areas over an approximate four-year period, beginning in early 2009 and ending in late 2012. Existing buildings to be removed as part of proposed construction activities would include structures in the central, northern, and eastern portions of the Shopping Center and the office buildings at 1801 Avenue of the Stars and 1930 Century Park West. The recently completed Shopping Center improvements within the western portion of the project site would remain. Phases relating to geographic locations within the site that are not specific with regard to timing have been identified. Phase A of the project is anticipated to include construction of the Shopping Center uses and residential uses in the northeast portion of the site at 1801 Avenue of the Stars. Phase B would include construction of new retail uses along the remainder of the Santa Monica Boulevard frontage within the northern portion of the site, together with the new parking facility at 1930 Century Park West within the southwestern portion of the site. Phase C would include construction within the southern portion of the site. Phase D would include construction within

the more central portion of the site. In addition, Phase E would include construction of the new office uses, located above the retail uses along Santa Monica Boulevard together with approximately 19,000 square feet of retail uses. Construction activities associated with these five phases are expected to overlap. Demolition would involve a total of 459,055 square feet of retail space and 360,964 square feet of office space. To provide for the new improvements, grading activities would include approximately 21,420 cubic yards of cut, 1,895 cubic yards of fill, and 19,607 cubic yards of cut for foundations. Of this grading, approximately 39,132 cubic yards is expected to be exported.

c. Discretionary Actions Requested and Permits Required

Approvals required for development of the New Century Plan would include, but may not be limited to, the following:

- Project Permit Compliance Review;
- Site Plan Review findings;
- Amendment to the Century City North Specific Plan (CCNSP) to extend the definition of the Shopping Center site to include the 1801 Avenue of the Stars and 1930 Century Park West properties, and apply the Retail Commercial CCNSP CATGP Trip rate factor to this enlarged Shopping Center site; to extend the existing CCNSP provision concerning the measurement of the Shopping Center height (as being measured from the floor elevation of the plaza level) to the entire Shopping Center site, including - Limited Height District No. 1 (1L), 1801 Avenue of the Stars, and 1930 Century Park West; to acknowledge that there should be no limit on the number of stories built within the Very Limited Height District No. 1 (1VL) portion of the Shopping Center as long as the 45-foot height limitation is not exceeded (consistent with existing height limitations for the Shopping Center along Century Park West); to clarify that provisions of the commercial corner ordinance which apply to the 1930 Century Park West property, if it were to be developed as a separate parcel, shall be superseded by the CCNSP and conditions of approval for the project; to consider the entire property as a unified site and allow for the transfer of floor area, density, and CCNSP CATGP Trips within the site as a whole; and to acknowledge that the Shopping Center may incorporate residential uses in keeping with smart growth goals of providing mixed-use sites within regional center sites;
- Conditional Use Permit for alcoholic beverages;
- Zoning Administrator Determination for Shared Use Parking;
- Vesting Tentative Tract Map;
- Commercial Corner findings;
- Demolition permits as required;

- Grading, excavation, foundation, and associated building permits;
- Haul route approval;
- Certification of an Environmental Impact Report;
- Filing of Form 7460-1, Notice of Proposed Construction or Alteration, with the Federal Aviation Administration for the residential building; and
- Other permits and approvals as deemed necessary.

In addition to the entitlements previously requested, Westfield has also filed an application for a Development Agreement for the project. This application was made in response to two issues; first, community questions about City mechanisms for ensuring that Westfield is required to provide mitigations in connection with its development, and second, changes in the economic climate which create the potential for delays in the proposed project construction schedule.

The Development Agreement responds to community questions by creating an additional enforcement tool for the City to ensure that required mitigations, as well as community benefits which may be negotiated through the entitlement process, are delivered in connection with implementation of the project. While existing rules such as the Mitigation Monitoring and Reporting Program, the Tentative Tract Map and other permitting requirements already provide such assurances, the Development Agreement adds an Annual Review requirement and constitutes an additional agreement which encompasses all of the project entitlements and conditions in order to provide additional certainty to the City. The additional certainty is also provided to Westfield for this multi-phase project, which is the type of project for which a Development Agreement is particularly suitable.

That certainty also allows for additional definition of the time period during which the project entitlements will remain valid. Since the Draft EIR was prepared for publication, there have been significant changes in the economy which may affect the ability to implement both the residential and retail elements of the project as quickly as the fastest schedule would permit. Under current market conditions, it is possible that the buildout will not be completed for some time. Under state law a Development Agreement can be valid for up to 25 years. The Development Agreement filed by Westfield is proposed to have such a term, but the actual duration and the other provisions of the Development Agreement remain subject to negotiation by the City. While comments on the proposed Development Agreement will be heard at the same forums where testimony is taken on the proposed Specific Plan Amendment, the negotiation of the Development Agreement is reserved for the City Council in conjunction with the City Attorney.

Following project approval, Westfield will work to implement the project on the schedule proposed, subject to market conditions. Because financing and tenant commitments are required before building permits can be sought for implementation of each phase of the project, delays are possible based on economic conditions. Should permits be sought for project implementation of the final phases beyond the latest buildout years for the project analyzed in the EIR, the City would review the environmental clearance for that phase of the project to determine whether the EIR mitigation measures remain valid or whether any additional analysis is required to update conditions and identify potential additional mitigation. The City would apply its usual CEQA standards to make that determination. Should the need for additional mitigation be identified, the City will also consider the extent to which the negotiated community benefits provided additional mitigation in determining whether such mitigation should be required at that time.

2. BACKGROUND OF THE PROPOSED PROJECT

The Westfield Century City Shopping Center was originally developed in the mid 1960s. The center provides a variety of uses, including numerous retail stores, a grocery store, restaurants, a multi-screen cinema and related uses. The Shopping Center has expanded and been upgraded over the past 40 years. In 1988, the City granted a Conditional Use Permit authorizing the sale and dispensing of alcoholic beverages for consumption on the Shopping Center premises, in conjunction with 18 restaurants, cafes, and delicatessens.³ More recently in 2001, a Plan Approval was granted to expand the Shopping Center by 71,700 square feet, with modified parking access.⁴ Although approved for a 71,700 square foot expansion, the actual project represented a net addition of only 63,075 square feet, as acknowledged by the City in a covenant and agreement recorded in 2004, not including the relocation of the existing AMC theater (which included 90,578 square feet and no increase in the number of theater seats).⁵ These improvements have been completed and include a relocated 15-screen state-of-the-art cinema adjacent to Macy's in the southwestern portion of the site (which opened in December 2005). Westfield's improvements have also included a new alfresco-style retail/dining terrace located north of the new cinema (which opened in November 2005), which added 1,308 square feet of space to the second floor food court area, as acknowledged by the City in another covenant and agreement recorded in 2005.⁶ Westfield has also expanded and renovated the Gelson's grocery store and added new luxury retail area along Century Park West, most of which was completed in December 2006. In addition, access improvements along Santa Monica Boulevard have also been recently completed. With these recently completed improvements,

³ *City of Los Angeles Case No. CF 88-0469, approved May 6, 1988.*

⁴ *City of Los Angeles Case No. ZA 2001-1375(CUB)(SPR), approved August 14, 2001.*

⁵ *Master Covenant and Agreement No. 04-1418128.*

⁶ *Master Covenant and Agreement No. 05-1826827.*

Westfield Century City Shopping Center includes an estimated 742,815 square feet of retail and restaurant uses, as well as 90,578 square feet of cinema uses with 3,074 seats. In addition, approximately 2,630 parking spaces are provided within two semi-subterranean levels below the Shopping Center uses.⁷ The heights of the existing structures within the Shopping Center range from one story to four stories (approximately 16 to 73 feet above the Shopping Center plaza, which ranges from 7 to 11 feet above the adjacent street grade).⁸

The remainder of the project site consists of the two adjacent properties at 1801 Avenue of the Stars and 1930 Century Park West. The 1801 Avenue of the Stars property, located on the southwest corner of Santa Monica Boulevard and Avenue of the Stars, currently consists of approximately 298,718 square feet of office uses within a 13-story building, with 607 parking spaces in four subterranean levels. A pedestrian crossing over Avenue of the Stars connects the 1801 Avenue of the Stars property to the 1800 Avenue of the Stars property located directly across the street. The property at 1930 Century Park West, located on the northeast corner of Century Park West and Constellation Boulevard, includes a building comprised of approximately 62,246 square feet of office uses within five stories (approximately 98 feet above grade). Below this building is a two-level subterranean parking area that together with a small surface parking area provides 161 parking spaces.

The entire project site is designated for Regional Commercial uses within the General Plan Framework and the West Los Angeles Community Plan, and lies within the Century City North Specific Plan area. The site encompasses three zoning designations as follows: C2-2-O along Avenue of the Stars (i.e., the 1801 Avenue of the Stars building); C2-1L-O extending from Santa Monica Boulevard to Constellation Boulevard through the center of the site (i.e., the majority of the existing Shopping Center); and C2-1VL-O along Century Park West (i.e., the western portion of the Shopping Center and the 1930 Century Park West building). The C2 portions of these designations indicate that the site is zoned for commercial uses (multi-family residential uses are also permitted within this zone). The second part of these zoning designations indicates the height districts that the site is located in. Three height districts apply to the project site: Height District No. 2 allowing for unlimited building height, Limited Height District No. 1 (1L) restricting building heights to a maximum of 75 feet, and Very Limited Height District No. 1 (1VL) restricting building heights to a maximum of 45 feet and three stories.⁹ Additionally, the third part of these zoning designations indicates that the project site is

⁷ *The 2,630 parking spaces within the Shopping Center provide 295 more parking spaces than required by the City.*

⁸ *Since the CCNSP requires that the heights of structures within the C2-1VL portion of the Shopping Center be measured from plaza level, the heights of other existing buildings within the Shopping Center have also been measured from plaza level to maintain consistency.*

⁹ *Section 12.21.2 of the City of Los Angeles Municipal Code. In addition, Section 7 of the CCNSP provides that heights of structures which are located in the C2-1VL portion of the existing Shopping Center shall be measured from the plaza level.*

within a supplemental oil drilling district (O). Under the Specific Plan, the site area zoned C2-1VL-O is part of the “Buffer Area” with a permitted FAR of 4.5:1, while the site areas zoned C2-1L-O and C2-2-0 are part of the “Core Area” with a permitted FAR of 6:1.

3. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Potential areas of controversy and issues to be resolved by the City’s decision-makers may include those environmental issue areas where the potential for a significant unavoidable impact has been identified. These areas may include air quality, historic resources, noise, shading and traffic. Based on the Notice of Preparation (NOP) comment letters, issues known to be of concern in the community include potential noise, traffic, parking, access, and school impacts associated with operation of the project.

4. PUBLIC REVIEW PROCESS

The City of Los Angeles circulated an NOP for a 30-day review period, beginning June 19, 2006 and ending July 19, 2006. In addition, a public scoping meeting was conducted on June 29, 2006. The NOP and letters and comments received during the comment period as well as comment sheets from the public scoping meeting were included in Appendix A of the Draft EIR. Concerning public review of the Draft EIR, a public review period of 47 days, beginning on March 13 and ending on April 28, was initially provided in accordance with CEQA Guidelines Section 15105(a). In addition, this review period was extended through May 12 to provide more time for responsible and trustee agencies as well as the public to comment on the Draft EIR. Thus, the public review period of the Draft EIR lasted a total of 61 days, well beyond the 45 days required by CEQA Guidelines Section 15105(a).

5. SUMMARY OF ALTERNATIVES

The Draft EIR examined five alternatives to the proposed project in detail, which include: No Project/No Build; Alternate Parking Design; Hotel and Residential Alternative; Reduced Density – No Office and Reduced Commercial Alternative; and Reduced Density – Replacement of Office Component with Retail Alternative. A general description of these Alternatives and a comparative summary of their impacts relative to the project are provided below.

Alternative A: No Project/No Build

The No Project/No Build Alternative assumes that the project would not be approved and no new development would occur within the project site. Thus, the physical conditions of the Westfield Century City Shopping Center and the 1801 Avenue of the Stars and 1930 Century Park West office uses would remain as they are today. No new buildings would be constructed, none of the existing facilities would be expanded or improved, and the existing buildings would continue to function as they currently do, with no residential development and no increase in Shopping Center or new office uses.

Implementation of the No Project/No Build Alternative would not result in new environmental impacts, and overall would result in a reduced level of impact when compared to the proposed project. Additionally, all of the significant and unavoidable impacts (i.e., air quality, shading, noise, historic resources, and transportation/circulation) associated with the proposed project would be avoided under this Alternative. However, under the No Project/No Build Alternative, the majority of the objectives established for the project would not be attained.

Alternative B: Alternate Parking Design

The Alternate Parking Design Alternative assumes that similar improvements to the Westfield Century City Shopping Center and development of residential and office uses proposed under the project would be implemented. Specifically, new retail areas would be located in the central, northern and eastern portions of the site, with some additional retail placed within the southern portion of the building occupied by Macy's along Constellation Boulevard, resulting in a net addition of approximately 358,881 square feet of Shopping Center uses within the site. Like the proposed project, this Alternative would involve the demolition of the office buildings at 1801 Avenue of the Stars and 1930 Century Park West and the construction of 106,523 square feet of office uses within levels 3, 4, and 5 along Santa Monica Boulevard. A total of 262 residential, multi-family apartment or condominium units would also be constructed. However, under the Alternate Parking Design Alternative, rooftop parking would not be included as part of the overall parking scheme. Rather, a total of 4,529 parking spaces would be located within the two existing semi-subterranean parking levels below the Shopping Center, the new parking facility at 1930 Century Park West, and within six levels of subterranean parking at 1801 Avenue of the Stars (versus four subterranean levels at 1801 Avenue of the Stars proposed under the project).

Implementation of this Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project. The Alternative would have a reduced level of impact relative to one issue area (operational noise, specifically associated with outdoor parking). While some issue areas would have greater impacts under the Alternative (e.g., air quality and noise impacts during construction due to increased grading), none of the greater

impacts would involve new significant impacts. Additionally, all of the significant and unavoidable impacts (i.e., air quality, historic resources, noise, shading, traffic and circulation) associated with the proposed project would also occur under this Alternative. Under the Alternate Parking Design Alternative all of the objectives established for the project would be attained.

Alternative C: Hotel and Residential

The Hotel and Residential Alternative (Alternative C) assumes that like the project, improvements to the Westfield Century City Shopping Center would be implemented. Specifically, new retail areas would be located in the central, northern and eastern portions of the site, with some additional retail placed within the southern portion of the building occupied by Macy's along Constellation Boulevard. However, the total net increase in Shopping Center floor area would be approximately 317,559 square feet, or approximately 41,332 square feet less than that proposed under the project. Similar to the proposed project, the Alternative would remove the office buildings at 1801 Avenue of the Stars and 1930 Century Park West. However, this Alternative would not include the 106,523 square feet of new office uses proposed under the project. Similar to the proposed project, 262 residential, multi-family, apartment or condominium units would be developed. In addition, a hotel with 204 rooms would be developed within the same building containing the residential uses at the northeast corner of the site. The hotel and residential uses would be located above up to four levels of retail uses, similar to the proposed project. The height of this new structure would be similar to the height proposed under the project (i.e., up to 587 feet above grade or 579 feet above the plaza level). Building heights in the retail areas of the Shopping Center associated with this Alternative would be similar to the proposed project with heights of up to approximately 75 feet above the plaza level, with the height of the plaza ranging from 7 to 11 feet above the adjacent street grades. Similar to the proposed project, a total of 4,529 parking spaces would be located within subterranean parking levels below the Shopping Center, a new parking facility at 1930 Century Park West, within new roof-top parking above the Shopping Center, and within four levels of subterranean parking below the residential building.

Implementation of the Hotel and Residential Alternative would result in similar environmental impacts for most issue areas as compared to the proposed project, although local operational air quality emissions and operational traffic impacts would be less. Additionally, all of the significant and unavoidable impacts (i.e., air quality, noise, historic resources, shading, and transportation and circulation) associated with the proposed project would also occur under this Alternative.

Under this Alternative, the project's community, site design, and economic objectives would generally be met. The Alternative would also meet many of the West Los Angeles Community Plan and CCNSP objectives and policies, including revitalizing an existing

commercial area with new development, strengthening Century City's competitive position within a larger commercial context, and creating a distinctive commercial district that integrates the various uses and structures on-site with community services and superior architectural qualities, with an emphasis on improving site access and promoting pedestrian-friendly design. In addition, the Alternative would create a mix of high-rise residential and retail development within an existing commercial district that utilizes an existing public transit network, however office development on the site would not occur. Overall, under the Hotel and Residential Alternative, the majority of the objectives established for the project would be attained, though not to the same extent as under the project.

Alternative D1: Reduced Density – No Office and Reduced Commercial

The Reduced Density – No Office and Reduced Commercial Alternative assumes that improvements to the Westfield Century City Shopping Center would be similar to the proposed project but would be reduced by approximately 19,000 square feet. Specifically, new retail areas would be located in the central, northern and eastern portions of the site, with some additional retail placed within the southern portion of the building occupied by Macy's along Constellation Boulevard, resulting in a net addition of approximately 339,881 square feet of Shopping Center uses within the site. The Alternative would involve the removal of the office buildings at 1801 Avenue of the Stars and 1930 Century Park West and would include development of 262 residential, multi-family apartment or condominium units, as proposed by the project. This Alternative would not, however, include the office uses proposed by the project. The height of the proposed buildings would be the same as the proposed project. As also proposed under the project, a total of 4,529 parking spaces would be located within existing semi-subterranean parking levels below the Shopping Center, a new parking facility at 1930 Century Park West, new roof-top parking above the Shopping Center, and within four levels of subterranean parking below the residential building.

The Reduced Density – No Office and Reduced Commercial Alternative would result in similar (less than significant) environmental impacts for most issue areas as compared to the proposed project. Additionally, many of the significant and unavoidable impacts (i.e., air quality, noise, shading, historic resources) associated with the proposed project would also occur under this Alternative. However, this Alternative would avoid the significant unavoidable impact relative to operational traffic that would occur under the proposed project.

Like the Hotel and Residential Alternative, overall under the Reduced Density – No Office and Reduced Commercial Alternative, most of the objectives established for the project would be attained, though not to the same extent as under the project.

Alternative D2: Reduced Density – Replacement of Office Component with Retail

The Reduced Density – Replacement of Office Component with Retail Alternative assumes that improvements to the Westfield Century City Shopping Center proposed under the project would be implemented; however, compared to the project this Alternative would develop an additional 59,000 square feet of retail in lieu of office uses, resulting in a net addition of approximately 417,881 square feet of Shopping Center uses within the site versus 358,881 square feet under the project. However, with elimination of the office component, this Alternative would result in a reduction in overall commercial square footage when compared to the project, with a net increase of 56,917 square feet of commercial uses over existing conditions (compared to a net increase of 104,440 square feet of commercial uses under the project). Similar to the project, new retail areas would be located in the central, northern and eastern portions of the site, with some additional retail placed within the southern portion of the building occupied by Macy's along Constellation Boulevard. In addition, this Alternative would include development of 262 residential multi-family apartment or condominium units, as proposed by the project. These units would be located above three levels of retail at the northeast corner of the site. Similar to the proposed project, the Alternative would involve the demolition of the office buildings at 1801 Avenue of the Stars and 1930 Century Park West to make room for the Shopping Center improvements, the residential development and the parking structure. As proposed by the project, a total of 4,529 parking spaces would be located within the existing semi-subterranean parking levels below the Shopping Center, new roof-top parking above the Shopping Center, a new parking facility at 1930 Century Park West, and within four levels of subterranean parking below the residential building.

The Reduced Density – Replacement of Office Component with Retail Alternative would result in similar (less than significant) environmental impacts for most issue areas as compared to the proposed project. Additionally, many of the significant and unavoidable impacts (i.e., air quality, noise, historic resources and shading) associated with the proposed project would occur under this Alternative. While this Alternative would result in a reduction of significant traffic impacts compared to the project, it would still result in a significant unavoidable impact relative to operational traffic and circulation.

Like the Hotel and Residential Alternative, overall under the Reduced Density – No Office and Reduced Commercial Alternative, most of the objectives established for the project would be attained, though not to the same extent as under the project.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The Guidelines also state that should it be determined that the

No Project/No Build Alternative is the environmentally superior alternative, the Draft EIR shall identify another environmentally superior alternative among the remaining alternatives. An environmentally superior alternative is an alternative to the project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with the project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the project.

In accordance with the CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that Alternative D1, the Reduced Density – No Office and Reduced Commercial, would be the environmentally superior alternative. This Alternative would reduce more of the project impacts than any of the other remaining alternatives and would eliminate the significant, unavoidable operational traffic and circulation impact of the proposed project.

6. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

a. Aesthetics/Visual Resources

(1) Visual Quality/Views

(a) Construction Impacts

Construction of the project would require demolition of several existing structures and portions of sidewalks and other areas; removal of several mature street trees; excavation activities; and construction of foundations, parking structures, rooftop parking areas, new buildings, and outdoor open space areas. The project's proposed landscaping plan would replace all removed street trees and increase overall landscaping features. In addition, the African coral tree, a distinctive existing landscape feature at the corner of Santa Monica Boulevard and Avenue of the Stars, would be preserved to the maximum extent feasible. Since the loss of street trees would be temporary, the removal of street trees during construction would not substantially alter, degrade or eliminate the existing visual character of the area. Therefore, visual quality impacts with respect to street trees would be less than significant.

The existing Shopping Center structures to be removed/renovated are primarily located within the central portion of the site and are not visible from surrounding public streets. Limited Shopping Center uses along Santa Monica Boulevard and Constellation Boulevard would also be removed/renovated but do not contain features that uniquely contribute to the visual quality of Century City. Since replacement buildings would be of higher quality and would be visually integrated with recently completed development within the Shopping Center, and since construction activities would be temporary in nature, the removal of these buildings would not adversely affect the visual character of the surrounding area and its aesthetic image.

In addition, the project would involve removal and replacement of the buildings at 1801 Avenue of the Stars and 1930 Century Park West. Although the 1801 Avenue of the Stars building reflects part of the original design intent of a master plan for Century City (which was only partially implemented), within the context of the current visual character of the area, the existing 13-story building is not a visually prominent feature and does not contribute in an important manner to Century City's visual character. In addition, the existing five-story office building at 1930 Century Park West does not significantly contribute to the visual character and image of Century City. The demolition and replacement of these buildings would not cause the loss of unique visual resources or prominent existing features. Therefore, demolition of on-site buildings would not substantially alter, degrade or eliminate the visual quality of Century City. Furthermore, due to the temporary nature of construction, these activities would not substantially degrade or eliminate the existing aesthetic image of Century City, or generate substantial long-term contrast with the visual character of the surrounding area. Therefore, visual quality impacts associated with construction would be less than significant.

(b) Operation (Post-Construction) Impacts

The project would result in greater density and building mass at the project site than under existing conditions. The project would develop a new Shopping Center and office uses up to 75 feet in height from the plaza level (approximately 359 feet amsl or approximately 82 to 86 feet above grade); a five-story parking structure; and a 49-story Shopping Center/residential building (approximately 862.5 feet amsl). The project would be characterized as high-quality architectural design that would complement the existing modern building design in Century City. The high-rise nature of the proposed residential tower would be consistent in character with other modern high-rise structures in the area.

The replacement of an existing five-story office building with a height of approximately 98 feet above grade with a parking structure with a height of approximately 60 feet above grade (45 feet above the plaza level) along Century Park West would enhance the buffer between the low-density residential neighborhood to the west and the taller components of the project, including the proposed new residential tower located on the northeast corner of the site. Since the parking structure would be approximately 38 feet lower than the existing building, contrast between the project site and the low-density, single-family neighborhoods to the west would be reduced, compared to existing conditions. Additionally, the higher elements of the project, including buildings up to 75 feet high (measured above the plaza) in the central portion of the project site and the 49-story tower at the northeast corner of the site, would be buffered from the residential uses to the west across Century Park West by the existing recently renovated Shopping Center buildings within the western portion of the project site.

Signage for the project would be consistent with existing zoning designations and consistent with the regulations related to signage in the vicinity of a designated Scenic Highway.

Signage along Century Park West would be approximately 60 percent less than what is permitted in order to enhance the buffer between the project's commercial uses and the residential neighborhood to the west. Adherence to code requirements for maximum signage would assure visual compatibility with surrounding uses since the City's urban design policies are implemented through code restrictions and allowances. With the implementation of lower building heights along Century Park West and the reduction in allowable signage, the visual contrast between the project's western frontage and lower density uses to the west would be less than significant.

(c) Policy and Regulatory Compliance

The project would be consistent with the policies set forth in the Urban Form and Neighborhood Design section of the City's General Plan Framework document, which are intended to promote pedestrian activity and to provide a quality experience for the City's residents. Therefore, the impact of the project with respect to General Plan Framework policy and regulatory compliance would be less than significant. With regard to the West Los Angeles Community Plan, the project would be consistent with applicable urban design policies, which establish the minimum level of design that would be observed relative to commercial uses, individual multi-family projects, and public open space. With the incorporation of both residential and expanded retail, entertainment, and restaurant uses, the project would support increased pedestrian activity and economic growth, would be compatible with the quality and scale of surrounding development and would complement the existing high-quality architecture of Century City. With respect to visual resources, the project would be substantially consistent with the regulatory policies and objectives of the CCNSP relative to shade/shadow, screening of mechanical equipment, parking structure design, and building heights with approval of the requested CCNSP amendment. The project would also be consistent with the Transportation Element of the General Plan, which designates Avenue of the Stars, located to the east of the project site, as a Scenic Highway. The project would not alter Avenue of the Stars in a manner that would negatively affect the roadway's current characteristics or inhibit the preservation and enhancement of scenic resources along a highway corridor. While the project would require the removal of the 13-story 1801 Avenue of the Stars building, the building is not a visually prominent feature and does not contribute in an important manner to the existing visual character of the area. Therefore, it is not an important scenic feature and the removal of this building would not be considered the removal of a scenic resource from a scenic highway. The project's proposed landscaping plan would incorporate high quality landscaping along the Avenue of the Stars frontage and would replace any removed trees with an improved landscaping design. The mature African coral tree at the corner of Avenue of the Stars and Santa Monica Boulevard is considered a scenic resource within the project vicinity and the maximum effort feasible would be made to preserve this scenic feature. The project would not impede existing views through the Avenue of the Stars corridor or degrade the existing urban environment along the Avenue of the Stars right-of-way. Although Santa Monica Boulevard is not specifically indicated as a Scenic Highway within the Scenic Highway Map of the General Plan, Santa Monica Boulevard

between Sepulveda Boulevard and the City of Beverly Hills is listed as a Scenic Highway in the Table provided in Appendix E “Inventory of Designated Scenic Highways” of the General Plan, Transportation Element. However, no scenic features or resources for Santa Monica Boulevard between Sepulveda Boulevard and the City of Beverly Hills are included in the Transportation Element. Thus, the proposed project does not include any features, such as signage, that would be in conflict with this designation and the project would be fully in conformance with the City’s “Scenic Highways Guidelines” (LA General Plan, Transportation Element, Section D). Therefore, the project would be consistent with the scenic highway policies of the General Plan Transportation Element.

(d) View Obstruction

View resources within the Century City area available from public and private view locations include: (1) views of the Century City skyline from near and distant view locations; (2) focal views of distinctive buildings, such as the AIG/SunAmerica building, the MGM Tower, the Century Plaza Hotel, and the Century Plaza Towers; (3) focal views of development and landscaping within and along the Avenue of the Stars scenic highway corridor; (4) panoramic views of the surrounding urban environment, such as the Los Angeles Country Club Golf Course; and (5) panoramic horizon or mountain views from street corridors, or other vantage points, and panoramic views of the Westwood/Wilshire Boulevard high-rise skyline.

The proposed project would not substantially block valued views of scenic resources from off-site locations. Rather, views of and across the project site from surrounding public streets and residential uses would, in many instances, be partially or entirely obstructed by existing intervening development. In addition, while the proposed residential tower would partially obstruct existing views available to office buildings surrounding the site, the change in the availability of views from the nearby office towers would be incremental. Overall, based on the incremental changes in views that would result from the project, the significance thresholds that are generally focused on public views, and the consistency of the project with the existing and anticipated development pattern of the surrounding area, view impacts would be less than significant.

(e) Cumulative Impacts

A total of 63 related projects located in the City of Los Angeles and 45 related projects located in the City of Beverly Hills are identified as potentially occurring in the project’s study area. Of these, four projects would be located within an area that could cumulatively contribute to visual quality and view impacts. The related projects are all high-rise in character and would contribute to the variation and interest of the Century City high-rise profile. These related projects, combined with the proposed project, would not alter the visual character of the area or substantially contrast with its aesthetic image, which already includes a high-rise profile and

distinctive buildings. These projects are not anticipated to remove any visually prominent existing features or other valued aesthetic resources. Further, none of the sites are occupied by natural features or buildings that have been identified as architecturally or historically important. In addition, since the proposed structures would increase the skyline profile of Century City and would be similar to the existing built environment, related projects would not individually or cumulatively contrast with the visual character of the surrounding area and its aesthetic image. Therefore, cumulative visual quality and view impacts would be less than significant.

(f) Mitigation Measures

With the implementation of the project's architectural and landscape design features, visual resource impacts would be less than significant. In addition, no significant impacts with respect to view obstruction are anticipated. Although no significant impacts have been identified, the following mitigation measures are recommended to reduce the project's less than significant construction impacts or to assure that specific design features would be implemented.

Mitigation Measure A.1-1: The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

Mitigation Measure A.1-2: The Applicant shall prepare a street tree plan to be reviewed and approved by the City's Department of Public Works, Urban Forestry Division. All plantings in the public right-of-way shall be installed in accordance with the approved street tree plan.

Mitigation Measure A.1-3: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the City of Los Angeles Department of Planning.

Mitigation Measure A.1-4: All new sidewalks along the project's street frontages shall be paved with pervious (permeable) concrete or interlocking pavers to create a distinctive pedestrian environment and to increase the opportunity for storm-water infiltration on the site.

Mitigation Measure A.1-5: Rooftop parking areas shall include screening (such as architectural canopies, trees, and other plantings and/or photovoltaic arrays) to reduce views of parking areas as viewed from adjacent high-rise buildings.

(g) Level of Significance After Mitigation

No significant visual quality or view impacts are identified for the project. Mitigation measures would be provided to further assure that project design features, such as replacement of existing street trees, would be implemented as anticipated. In addition, mitigation measures would reduce the project's less-than-significant construction impacts to an even lower level of impact. As previously discussed, the project would contribute to the high quality architecture of Century City and would be compatible with the urban skyline. In addition, the project would not result in substantial view blockage of any valued views from public streets and parks or from residential locations. With the implementation of the proposed mitigation measures and design features, no significant visual quality and view impacts would occur.

(2) Light, Glare, and Shading**(a) Environmental Impacts**

Construction activities would occur primarily during daylight hours and any construction-related illumination would be used for safety and security purposes only. With adherence to existing Los Angeles Municipal Code (LAMC) regulations, artificial light associated with construction activities would not significantly impact residential uses, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Therefore, artificial light impacts associated with construction would be less than significant. Construction activities are also not anticipated to result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Therefore, less than significant impacts with respect to reflected sunlight and natural glare are anticipated.

With regard to operations, new sources of artificial lighting from the project would include lighting from storefront windows, windows in the residential tower, illuminated signage, architectural lighting on buildings, security lighting, street lights, and automobile headlights from cars driving in the new parking structure and roof-top parking lot. Artificial light along the Century Park West frontage would be kept to a minimum and no new illuminated signage would be visible from adjacent R1 property to the west of Century Park West. Additionally, any streetlights and decorative luminaries installed along street frontages would be coordinated with the City of Los Angeles Bureau of Street Lighting to maintain appropriate and safe lighting levels on both sidewalks and roadways while minimizing light and glare on adjacent properties. With implementation of project design features and applicable LAMC regulations, lighting associated with the project would not substantially alter the character of the off-site areas surrounding the project and would not interfere with the performance of an off-site activity. Impacts attributable to project-induced artificial lighting would be less than significant.

Reflective glare would not be expected during winter morning hours or during the other seasons of the year along Santa Monica Boulevard or other streets approaching the project site due to the respective positions of the sun and intervening structures. While project windows would be made of non-reflective glass, building accents may include metal or other highly polished surfaces that have the potential to create glare. While acute glare conditions that hazardously interfere with driving are rare, they do occur and have the potential to exist on the southwestern façade of the residential tower. This impact is considered potentially significant, however implementation of mitigation measures would reduce the impact to a less than significant level. In addition, the proposed rooftop parking areas would have the potential to reflect glare into the windows of adjacent office buildings and interfere with the performance of an off-site activity. Project design features include the screening of the rooftop parking lots as viewed from above to reduce and/or eliminate this potential glare impact. With the implementation of project design features, glare from reflected sunlight from any surface parking areas would not interfere with the performance of an off-site activity. Therefore, glare impacts associated with rooftop parking would be less than significant.

Shadows from the project would reach shade-sensitive residential areas to the north of Santa Monica Boulevard, the Los Angeles Country Club golf course, the Beverly Hills High School campus, and residential neighborhoods in the City of Beverly Hills. The project would not shade single-family residential properties outside the CCNSP for more than two continuous hours, and no new shading would occur over multi-family residential properties for more than three hours. As such, shade/shadow impacts on residential uses would be less than significant. The project's shadow would extend across the southern portions of the golf course during the winter solstice and spring equinox. However, the majority of the areas of the golf course that would be shaded by the project are already shaded by existing buildings within Century City during various timeframes throughout the day. Furthermore, new shading generated by the project would occur on very limited areas of the overall golf course. New periods of shading from the project at any one area within the golf course would be substantially less time than three hours. In addition, the proposed residential tower has been oriented such that the shadows cast on the golf course would be narrow and thus move quickly across the southern areas of the golf course. Nonetheless, the total amount of time that new shading would occur over the entire expanse of the golf course during the winter solstice and spring equinox would add up to more than three hours. Thus, it is conservatively assumed that such shading impacts during the winter solstice and spring equinox would be significant. No significant impacts would occur on the golf course during the remaining times of the year. In addition, no other shade-sensitive uses would be significantly impacted by the proposed project.

(b) Cumulative Impacts

A total of 108 related projects are located in the vicinity of the project site. While the majority of these projects are a substantial distance from the project site, four related projects are

located in the immediate vicinity, including the 10131 Constellation Boulevard project (Related Project No. 44), the ABC Entertainment Center project (Related Project No. 15), the 2055 Avenue of the Stars project (Related Project No. 16), and the 10000 Santa Monica Boulevard project (Related Project No. 48). It is anticipated that these related projects located near the project site would contribute to an increase in ambient light along Avenue of the Stars and Santa Monica Boulevard. However, existing ambient light associated with illuminated signage may be reduced at a couple of the projects since these are residential projects that would replace existing commercial uses that have illuminated signage. In general, lighting associated with residential land uses is lower than lighting associated with commercial uses since advertising, public way finding, and building identification signs are not critical to the operation of residential uses. The other nearby related projects would replace a former live theater and restaurants that, in the past, generated high evening activity that required nighttime lighting. Therefore, a substantial increase in artificial lighting, or a cumulative impact in combination with the project, is not anticipated. Relative to glare, since the project's potential glare impacts would be eliminated through the implementation of project design features and the recommended mitigation measures, the project would not contribute to any cumulative increase in glare in combination with any related project.

With regard to shading, Related Project No. 48 has the potential to cumulatively increase shading impacts. Since this related project is also located at the north edge of Century City, it has the potential of casting shadows on the single-family residential neighborhood north of Santa Monica Boulevard as would the project. However, Related Project No. 48 is located two city blocks to the east of the project site and would cast shadows that would enter and leave the single-family neighborhood considerably earlier than the project. The shadows of both the project and related project would not be adjacent to each other or cause shading of residential uses. However, based on its location, this related project would also be expected to cast shadows onto different areas of the golf course for more than three hours. Thus, cumulative shading impacts of the proposed project, Related Project No. 48 and other related projects such as Related Project No. 44 that would cast shadows onto the golf course would be significant. The shadows from Related Project No. 15 would be largely overshadowed by existing Century City shadows since this project would be lower in height than surrounding existing buildings. Related Project No. 16 would result in the development of a residential tower that would be higher than the pre-existing St. Regis Hotel on the same site. However, since this project is located several blocks south of the project site, the shadow would not impact the same residential or shade sensitive areas. Therefore, shadows from these two related projects would not combine with the project's shadows or contribute to cumulative shading impacts.

(c) Mitigation Measures

With the implementation of the project's design features and existing LAMC signage and lighting regulations, no significant light and glare impacts have been identified. However, the

following mitigation measures are recommended to ensure that specific design features would be implemented to reduce potential light and glare impacts to less than significant levels.

Mitigation Measure A.2-1: All new street and pedestrian lighting within the public right-of-way shall be approved by the Bureau of Street Lighting and shall be tested in accordance with the requirements of the Bureau of Street Lighting.

Mitigation Measure A.2-2: All new street and pedestrian lighting shall be shielded and directed away from any light-sensitive off-site uses.

Mitigation Measure A.2-3: No new lit signage shall be visible from adjacent R1 property to the west of Century Park West.

Mitigation Measure A.2-4: All exterior windows and glass used on the building surfaces shall be non-reflective.

Mitigation Measure A.2-5: Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.

Mitigation Measure A.2-6: Prior to the issuance of a building permit, architectural plans showing building surface materials, particularly on the southwestern façade of the residential tower, shall be submitted to the Planning Department for review to ensure that specific surfacing materials and trim shall not cause roadway glare.

Mitigation Measure A.2-7: Prior to the issuance of a building permit, architectural plans showing screening treatments for all rooftop parking areas shall be submitted to the Planning Department for review to ensure that glare from parked vehicles would not be adversely intrusive upon adjacent or surrounding uses.

(d) Level of Significance After Mitigation

With the implementation of project design features, LAMC regulations, and recommended mitigation measures, no significant natural and artificial light or glare impacts would occur.

The project would not exceed the shading thresholds of the CCNSP with regard to shading of single-family residential uses. However, as discussed above, although project generated shading would occur on areas of the golf course that are already shaded during portions of the day by existing buildings, and the shading generated by the project at any given location on the golf course would occur for far less than the three-hour threshold, the project would result in shading of different areas of the golf course for more than three hours during the

winter solstice and spring equinox. Thus, it is conservatively assumed that such shading impacts during the winter solstice and spring equinox would be significant. No feasible mitigation measures are available to mitigate this impact. Specifically, to eliminate this impact, the residential tower would need to be reduced from the proposed height of 587 feet above grade to approximately 200 feet above grade. As discussed in more detail in Section V, Alternatives, of the Draft EIR, a building of this height would not provide for the program of uses proposed by the project. The inability to provide for the proposed uses, together with the investment that would be necessary to construct a state-of-the-art landmark building, would result in a project that would not be feasible and would not meet the basic project objectives. Cumulative shading impacts of the proposed project together with the related projects would also remain significant based on this conservative approach to the shading analysis.

b. Air Quality

(1) Construction

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from demolition and construction activities. Mobile source emissions, primarily nitrogen oxides (NO_x), would result from the use of construction equipment such as dozers, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Under the most conservative scenario in which phases of construction would overlap, construction-related daily maximum regional construction emissions would not exceed the Southern California Air Quality Management District (SCAQMD) daily significance thresholds for particulate matter (PM₁₀ and PM_{2.5}), or sulfur oxides (SO_x). However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for volatile organic compounds (VOC), CO and NO_x during periods of heavy use of heavy-duty construction equipment. Therefore, regional construction emissions resulting from the project would result in a significant short-term impact.

For localized impacts, the conservative estimate of maximum on-site daily emissions for CO, NO_x, PM₁₀ and PM_{2.5} was compiled for each phase of construction and compared to the applicable screening threshold based on construction site acreage and distance to closest sensitive receptor. In addition, it is anticipated that construction activities within Phases A and B and Phases A and C would overlap. Thus, localized impacts associated with overlap of these geographic phases were evaluated. In addition, a worst case scenario was also evaluated which

assumes that construction activities of all phases occur simultaneously. The SCAQMD LST methodology provides screening level thresholds for projects that are five acres in size or less. Since overlapping phases may exceed five acres in size, ISCST3 dispersion modeling was performed, which determined that PM₁₀ and PM_{2.5} localized impacts would exceed the SCAQMD recommended thresholds. The maximum PM₁₀ and PM_{2.5} concentrations of 35.4 µg/m³ and 13.9 µg/m³ respectively, would occur at residential uses on the west side of Century Park West, approximately 25 meters west of the project site. Maximum PM₁₀ concentrations would occur primarily from site grading activities for Phase B. This impact would be significant, but temporary.

The greatest potential for toxic air contaminant (TAC) emissions would be related to diesel particulate matter (DPM) emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. While it is anticipated that much of the site grading and excavation would be accomplished within a 7-month time period, unforeseen delays could extend these activities. Nevertheless, the proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. In addition, there would be no residual emissions after construction and no corresponding individual cancer risk. As such, project-related toxic emission impacts during construction would be less than significant.

Potential sources that may emit odors during construction activities include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Due to mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed which would create objectionable odors. Therefore, no odor impacts would occur and no mitigation measures would be required.

(2) Operation

Regional air pollutant emissions associated with proposed project operations would be generated by the consumption of electricity and natural gas and by the operation of on-road vehicles. Accounting for both stationary (i.e., energy production-related) and mobile (vehicular) source emissions, regional weekday emissions resulting from the operation of the project are expected to exceed the SCAQMD thresholds for CO, NO_x, VOC, and PM_{2.5}. Regional weekend emissions resulting from the operation of the project are also expected to exceed the SCAQMD thresholds for CO, NO_x, PM₁₀, PM_{2.5}, and VOC.

Relative to localized impacts, CO concentration levels were forecasted at the intersections of Beverly Glen Boulevard and Pico Boulevard, and the Project Driveway and Santa Monica Boulevard, using peak-hour traffic volumes and conservative meteorological assumptions. Project-generated traffic volumes are forecasted to have a negligible effect on the projected 1-hour and 8-hour CO concentrations at the respective intersection locations. Since a significant impact would not occur at the intersections operating at the highest V/C ratio, no significant impacts would occur at any other analyzed roadway intersection as a result of weekday or weekend project-generated traffic volumes. Thus, the proposed project would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

The proposed project would likely include the installation and operation of diesel-fired generators for emergency power generation. Unless a blackout occurs, these generators would be operated for only a few hours per month for routine testing and maintenance purposes. The Applicant would be required to obtain a permit to construct and a permit to operate any standby generators under SCAQMD Rules 201, 202, and 203. Under SCAQMD Regulation XIII, all generators must meet Best Available Control Technology (BACT) requirements to minimize emissions of PM₁₀ (as well as CO, VOC, and NO_x emissions). Compliance with SCAQMD Rules and Regulations regarding stationary-source combustion equipment would ensure that contributions to localized PM₁₀ concentrations remain below the 2.5 µg/m³ significance threshold. As such, any potential impacts would be less than significant.

As project construction would occur over a four year period and the project would be completed in phases, the potential exists for concurrent construction and operational impacts. Concurrent construction and operational emissions of CO, NO_x, and VOC would be considered significant since the levels of these emissions would exceed their respective SCAQMD construction and operational regional significance thresholds. Although concurrent construction and operational activities would occur for a short duration, these emissions would result in significant and unavoidable impacts.

The ambient air environment that currently exists on and around the project site would also impact the residential uses that would be developed as part of the proposed project. The proposed project is not considered a high risk source of diesel particulate matter, which contributes to the majority of toxic health risks, and is not located sufficiently proximate to such sources (e.g., ports, rail yards and distribution warehouses). Therefore, the siting of residential uses on the project site would not result in a significant impact with regard to the exposure of on-site residents to the TAC emission sources identified in the California Air Resources Board's (CARB's) siting recommendations (i.e., the project would not site residential uses in a high cancer risk area due to ambient air quality).

The primary sources of potential air toxics associated with proposed project operations would include DPM from delivery trucks (e.g., truck traffic on local streets and on-site truck idling) and emergency backup generators. In 2004, CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs and air pollutants. Although there will be an increase in the retail square footage and presumably an increase in the number of delivery trucks, this ATCM would significantly limit potential emissions from loading dock activity. As such, the proposed project would not be considered a substantial source of DPM, and a significant air quality impact would not occur.

Typical sources of acutely and chronically hazardous toxic air contaminants include industrial manufacturing processes, automotive repair facilities, and dry cleaning facilities. The proposed project would not include any of these potential sources, although minimal emissions may result from the use of consumer products. As such, the proposed project would not release substantial amounts of toxic contaminants, and no significant impacts on human health would occur. Based on the limited activity of the toxic air contaminant sources, the proposed project does not warrant the need for a health risk assessment, and potential air toxic impacts would be less than significant.

According to the SCAQMD *CEQA Air Quality Handbook*, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The proposed project does not include any uses identified by the SCAQMD as being associated with odors. As the residential activities would not be a source of odors, potential odor impacts would be less than significant.

(3) Global Climate Change

As discussed in the Draft EIR, during construction, the net increase in GHG emissions from on-road mobile source emissions and on site construction equipment relative to the 2004 state-wide levels ranges from 0.00095 percent in 2009 to 0.00041 percent in 2012. In addition, during operation of the project, the net increase in GHG emissions from vehicle, electrical, and natural gas usage associated with the proposed project was calculated as approximately 0.00327 percent of the 2004 state-wide emission levels.

The project would incorporate energy reducing project features such as designing, constructing, and operating the project to obtain LEED certification, installing appliances, fixtures, lighting and infrastructure that use less energy and water, using high-albedo roofing materials, pursuing roof- or parking shade-mounted photovoltaic generation of electricity, and implementing commissioning of the project's lighting, mechanical, heating, and cooling systems. In addition, the project would install water-efficient appliances and fixtures, and utilize low-

water irrigation techniques to conserve water, and thus reduce energy usage and related GHG emissions. The project would result in lower VMT from residents, patrons, and employees of the project by locating housing near mass transit and employment centers, locating retail and entertainment opportunities on a major public transportation route, and providing bicycle access and storage. In addition, the Applicant will encourage the use of alternative forms of transportation and ride sharing through establishing a program of incentives and informational kiosks. By incorporating these project features, the proposed project would lower its energy and water demand, as well as the VMT associated with it. Thus, the project would result in lower GHG emission rates compared to current standards and practices. In addition, the project complies with the California Climate Action Team Report strategies regarding reduction of green house gas emissions. The proposed project would also be consistent with the goals of California's AB 32. In the absence of numeric thresholds and given the consistency of the proposed project with the State and City's goals, the contribution of the project to global climate change is considered less than significant. As such, no mitigation is required.

(4) SCAQMD CEQA Air Quality Handbook Policy and City of Los Angeles Policies Analyses

The determination of consistency with the Air Quality Management Plan (AQMP) is primarily concerned with the long-term influence of the project on air quality in the Basin. While development of the project would result in short-term regional impacts, project development would not have a long-term impact on the region's ability to meet State and federal air quality standards. The project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of PM₁₀ and PM_{2.5}. Also, the project would be consistent with the goals and policies of the AQMP for control of fugitive dust. The project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

Development of the proposed project at the proposed site location offers the opportunity to provide residential uses in the middle of a highly urbanized regional employment center and does so via the use of existing infrastructure, proximity to existing regional and local transit facilities, encouragement of pedestrian activity, and location near existing commercial uses that would meet many of the needs of the project's future residents. Based upon this evaluation, it is concluded that the proposed project would be consistent with City of Los Angeles air quality policies as it implements the air quality goals and policies set forth in the City's General Plan.

(5) Cumulative Impacts

Construction-period CO, NO_x and VOC mass regional emissions, and localized PM₁₀ and PM_{2.5} emissions associated with the proposed project are projected to result in a significant impact to air quality. As such, cumulative impacts associated with regional CO, NO_x and VOC

and localized PM₁₀ and PM_{2.5} emissions during proposed project construction would also be significant and unavoidable.

Similar to the proposed project, the greatest potential for TAC emissions at each related project would involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. As the proposed project's contribution to cancer risk from construction activities would be less than significant and is a localized impact, related projects that have not already been built would not result in a long-term (i.e., 70 years) substantial source of TAC emissions, with no residual emissions after construction and corresponding individual cancer risk. Thus, TAC emissions from the related projects are anticipated to be less than significant individually and cumulatively.

Also similar to the proposed project, potential sources that may emit odors during construction activities at each related project would include the use of architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules (e.g., Rule 1113), it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. Thus, odor impacts from the related projects are anticipated to be less than significant individually, as well as cumulatively in conjunction with the proposed project.

Peak daily emissions of operation-related pollutants would exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the proposed project would result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Therefore, the emissions of non-attainment pollutants and precursors generated by project operation in excess of the SCAQMD project-level thresholds would also be cumulatively considerable.

With respect to TAC emissions, the proposed project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products and landscape maintenance activities, among other things. Pursuant to California Assembly Bill 1807, the SCAQMD has adopted numerous rules that specifically address TAC emissions, which will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the proposed project would not result in any sources of TACs that have been identified by CARB's Land Use Guidelines, and thus, would not contribute to a cumulative impact.

With respect to potential odor impacts, neither the proposed project nor any of the related projects have a high potential to generate odor impacts. Thus, potential odor impacts from related projects are anticipated to be less than significant individually and cumulatively.

Until such time as further state guidance is available on thresholds of significance, public agencies should consider various factors, such as AB32, the strategies established by the California Climate Action Team (CAT), led by the Secretary of California EPA, and the *LA Green Plan*, when analyzing whether a proposed project has the potential to cause a significant climate change impact on the environment. Thus, if a project implements design strategies consistent with the goals of AB32, the CAT strategies (discussed in the Draft EIR), and the *LA Green Plan*, the project will not be considered to have a significant impact with respect to global climate change, either on a project-specific basis or with respect to its contribution to a cumulative impact on global climate change. While it is not possible at this time to quantify the exact reductions in greenhouse gas emissions anticipated from the project features, the proposed project would be consistent with the goals of California's AB32. The project would incorporate energy reducing project features such as designing, constructing, and operating the project to obtain LEED certification, installing appliances, fixtures, lighting and infrastructure that use less energy and water, using high-albedo roofing materials, pursuing roof- or parking shade-mounted photovoltaic generation of electricity, and implementing commissioning of the project's lighting, mechanical, heating, and cooling systems. In addition, the project would install water-efficient appliances and fixtures, and utilize low-water irrigation techniques to conserve water, and thus reduce energy usage and related GHG emissions. The project would result in lower VMT from residents, patrons, and employees of the project by locating housing near mass transit and employment centers, locating retail and entertainment opportunities on a major public transportation route, and providing bicycle access and storage. In addition, Westfield will encourage the use of alternative forms of transportation and ride sharing through establishing a program of incentives and informational kiosks. By incorporating these project features, the proposed project would lower its energy and water demand, as well as the VMT associated with it. Thus, the project would result in lower GHG emission rates compared to current standards and practices. In addition, the project complies with the California Climate Action Team Report strategies regarding reduction of green house gas emissions. In the absence of numeric thresholds and given the consistency of the proposed project with the State and City's goals, the contribution of the project to global climate change is considered less than significant. As such, no mitigation is required.

(6) Mitigation Measures

(a) Construction

The following mitigation measures are (1) intended to implement requirements of SCAQMD Rule 403 (Fugitive Dust) and (2) set forth a program of air pollution control strategies designed to reduce the proposed project's air quality impacts to the extent feasible during construction.

Mitigation Measure B-1: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.

Mitigation Measure B-2: All construction equipment shall be properly tuned and maintained in accordance with manufacturer's specifications.

Mitigation Measure B-3: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions. During construction, trucks and vehicles in loading and unloading queues shall turn their engines off when not in use to reduce vehicle emissions. Construction emissions shall be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure B-4: Electricity rather than temporary diesel- or gasoline-powered generators shall be used.

Mitigation Measure B-5: All construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site.

Mitigation Measure B-6: The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations.

(b) Operation

Mitigation Measure B-7: The Applicant shall schedule routine deliveries during off-peak traffic periods to encourage the reduction of trips during the most congested periods.

Mitigation Measure B-8: The Applicant and the City of Los Angeles Department of Transportation shall cooperatively provide information to assist visitors in locating nearby public transportation.

Mitigation Measure B-9: The Applicant shall install energy-efficient appliances (e.g., ENERGY STAR) to reduce energy consumption.

In order to further reduce construction emissions impacts, the following mitigation measures have also been included:

Mitigation Measure B-10: The project applicant shall require on-site off-road construction equipment to meet EPA Tier 2 emissions standards (Model Year 2001 or later) at a minimum. Construction equipment meeting Tiers 3 and 4 emissions standards will be implemented when commercially available and if feasible. This requirement will apply to any piece of equipment which is expected to operate on-site more than 15 days. In addition to meeting Tier 2 emissions standards, the following shall be required for on-site construction equipment:

- Use late model heavy-duty diesel-powered equipment with cooled exhaust gas recirculation at the project site
- Maintain records on fuel use, hours of operation, and periodic maintenance of all construction equipment.

Mitigation Measure B-11: For equipment not covered by Mitigation Measure B-10 above, the project Applicant shall evaluate the potential for reducing exhaust emissions from on-road and off-road construction equipment, and implement such measures to the extent feasible. Control technologies to be considered may include particulate traps and filters, selective catalytic reduction, oxidation catalysts, air enhancement technologies, and the use of alternatively (non-diesel) fueled engines. Feasibility considerations will include commercial availability of appropriate California Air Resources Board verified technologies and cost effectiveness calculated in accordance with guidelines established under the Carl Moyer Program.

Mitigation Measure B-12: The Applicant shall install shaker plates at construction site exits, to minimize dirt track out and dust generation.

Mitigation Measure B-13: The Applicant shall operate street sweepers that comply with SCAQMD Rules 1186 and 1186.1 on roads adjacent to the construction site in a nearly continuous manner so as to minimize dust emissions. Paved parking and staging areas shall be swept daily.

Mitigation Measure B-14: An information sign shall be posted at the entrance to each construction site that identifies the permitted construction hours and provides a telephone number to call and receive information about the construction project or to report complaints regarding excessive fugitive dust generation. Any reasonable complaints shall be rectified within 24 hours of their receipt.

(7) Level of Significance After Mitigation

(a) Construction

Implementation of the mitigation measures described above would reduce construction emissions for all pollutants. However, the project would remain in exceedance of the SCAQMD regional significance thresholds for CO, NO_x and VOC during the most intense construction period. As such, project construction would continue to result in a significant regional impact even with incorporation of all feasible mitigation measures.

Implementation of the mitigation measures described above would reduce localized PM₁₀ emissions by 33 percent and PM_{2.5} emissions by 19 percent. Even with incorporation of

mitigation measures, the project would remain in exceedance of the SCAQMD LST threshold for PM₁₀ and PM_{2.5}. This impact is determined based on the maximum rate of activity, predicting the maximum day emissions. Actual construction activities would on average occur at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions. Therefore, the modeled set of conservative assumptions likely overstates the potential localized impacts. However, the conclusion remains that project impacts during construction would be significant and unavoidable even with incorporation of all feasible mitigation measures. Cumulative construction air quality impacts would also remain significant.

No notable impacts related to TAC emissions during construction are anticipated to occur for the proposed project. As such, potential impacts would be less than significant.

The proposed project is not anticipated to generate a substantial amount of objectionable odor emissions during construction. Via mandatory compliance with SCAQMD Rules, no construction activities or materials are proposed that would create objectionable odors. As such, potential impacts would be less than significant.

(b) Operation

Regional operational emissions would still exceed the SCAQMD daily emission threshold for regional VOC and NO_x after implementation of feasible mitigation measures. Therefore, operation of the proposed project would have a significant and unavoidable impact on regional air quality. In addition, regional concurrent construction and operational emissions would still exceed SCAQMD daily thresholds for NO_x after implementation of feasible mitigation measures. Therefore, concurrent construction and operation of the proposed project would have a significant and unavoidable impact on regional air quality. Cumulative regional air quality impacts would also be significant. No significant impacts related to local CO concentrations would occur for the proposed project. Project development would be consistent with the air quality policies set forth in the SCAQMD's AQMP and the Los Angeles General Plan Air Quality Element, resulting in an impact that is less than significant.

The proposed project is not anticipated to include any notable TAC emission sources. As such, potential impacts from proposed project TAC emissions would be less than significant. Via compliance with industry standard odor control practices, SCAQMD Rule 402 (Nuisance), and SCAQMD Best Available Control Technology Guidelines, potential impacts that could result from any potential odor source would be less than significant.

c. Historic Resources

The Historic Resources Technical Report for the project site concluded that the 10250 Santa Monica Boulevard and 1930 Century Park West properties do not include potential historic resources. In addition, it concluded that the property at 1801 Avenue of the Stars is not eligible for the National Register. However, while clear arguments against the eligibility of 1801 Avenue of the Stars for the California Register and as a Los Angeles Historic-Cultural Monument can be made, as described in greater detail below, a conservative assessment may conclude that 1801 Avenue of the Stars is a potential historic resource.

(1) Environmental Impacts

(a) 1801 Avenue of the Stars Building

At the federal level, 1801 Avenue of the Stars, built in 1962-1963, does not meet the 50-year age consideration of the National Register of Historic Places (National Register). Neither the 1801 Avenue of the Stars building nor the identical building at 1800 Avenue of the Stars have been objects of the type of recognition or acclaim normally directed towards many other notable works by Welton Becket and Associates. When they were initially constructed in a largely low-rise setting surrounding the still-vacant and undeveloped Century City, the 1801 and the 1800 Avenue of the Stars buildings reflected the architectural firm of Becket's original intent to place a pair of buildings as a gateway from Santa Monica Boulevard into Century City, the first large scale, master planned corporate and commercial center of the post-war era in Southern California. However, the published record shows that the master plan and individual buildings were not widely recognized or admired at the time of their completion and they have not achieved exceptional importance within the last fifty years as set forth by National Register Criteria Consideration G. Intended to pioneer new trends in architecture, little of the ambition of the master plan has been realized, as only the most basic framework of the 1961 Century City master plan exists today, namely the underlying street grid and general distribution of land uses. 1801 Avenue of the Stars cannot be directly associated with Welton Becket, himself, and has outlasted the context in Century City for which it was designed and built. Thus, the 1801 Avenue of the Stars building does not meet the threshold of significance for listing in the National Register under Consideration G as a property of exceptional importance either as an individual resource or within the context of the Century City master plan.

At the state level, 1801 Avenue of the Stars is not associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1); nor is it associated with lives of persons important in our past (Criterion 2). With regard to Criterion 3, there are numerous other office buildings completed by the architectural

firm of Welton Becket and Associates during the 1950s-1960s that were corporate Modern exhibiting formal Miesian-style influence.¹⁰ Furthermore, 1801 Avenue of the Stars is not a widely recognized or noteworthy example within the Becket firm's body of work and it cannot be directly associated with Welton Becket, himself. Nonetheless, a conservative assessment may conclude that 1801 Avenue of the Stars may be considered potentially eligible under Criterion 3 as a representative example of a corporate Modern high-rise office building of the 1950s-1960s which incorporates formal Miesian style influences (e.g., an open pedestrian plaza, ground-floor glass walls set back behind outer piers, curtain walls, uninterrupted vertical lines, etc.) and the use of aluminum. The building has not yielded, nor is it likely to yield, information important in prehistory or history (Criterion 4). The building retains a high degree of integrity (location, design, setting, materials, workmanship, feeling, and association). Alterations to the exterior are minimal, whereas the interior has been repeatedly remodeled to accommodate changes in tenants although the public areas remain intact. In summary, with regard to eligibility at the state level, a conservative assessment may conclude that 1801 Avenue of the Stars may be considered potentially eligible under Criterion 3.

At the local level, 1801 Avenue of the Stars is not eligible as a Los Angeles Historic-Cultural Monument under the City's first or second criteria. It does not reflect or exemplify the broad cultural, political, economic or social history of the nation, state or City (community); nor is the building identified with historic personages or events in the main currents of national, state, or local history. However, a conservative assessment may conclude that the building may be considered potentially eligible as a Los Angeles Historic-Cultural Monument under a combination of the City's third and fourth criteria, though it does not appear to fully satisfy either one. It does include certain distinguishing architectural characteristics of an architectural-type specimen. It is a representative example of an architectural type-specimen, a corporate Modern high-rise office building of the 1950s-1960s which incorporates formal Miesian style influences. However, it cannot be argued that it is inherently valued for a study of period, style or method of construction, as it is representative but not a notable example of its type. And while it is the work of a prolific architect's firm, it is not recognized as an exceptionally important work of the firm or the architect within the last fifty years. Nonetheless, a conservative assessment may conclude that the building may be considered potentially eligible as a Los Angeles Historic-Cultural Monument.

The 1801 Avenue of the Stars building is proposed to be removed as part of the project. As indicated above, the property at 1801 Avenue of the Stars is not eligible for the National Register. However, while clear arguments against the eligibility of 1801 Avenue of the Stars for the California Register and as a Los Angeles Historic-Cultural Monument can be made, a conservative assessment may conclude that the building and its associated contributing features

¹⁰ William Dudley Hunt, Jr., *Total Design: Architecture of Welton Becket and Associates* (New York: McGraw-Hill Book Company, 1972), pp. 13, 15, 17, 20, 183-217.

and objects are considered potentially eligible for the California Register and as a Los Angeles Historic – Cultural Monument. Therefore, 1801 Avenue of the Stars may be considered a historical resource for the purposes of CEQA under Section 15064.5(a)(2) of the CEQA Guidelines. As the project would result in the removal of the 1801 Avenue of the Stars building and features, which may conservatively be assumed to be a historic resource, the proposed project may be considered to result in a significant impact on the environment under CEQA.

(b) 10250 Santa Monica Boulevard - Century City Shopping Center (formerly Century Square)

The Century City Shopping Center, also designed by the architectural firm of Welton Becket and Associates, does not possess sufficient integrity or significance to be considered potentially eligible for listing in the federal, state or local registers. The Century City Shopping Center as an individual project has not achieved exceptional importance within the last fifty years and does not meet the threshold of significance for eligibility to the National Register under Consideration G. The Shopping Center's location within the master plan does reflect Becket's original design intent, but the master plan was only partially completed and has not achieved exceptional importance within the last fifty years. In addition, the Century City Shopping Center has been extensively altered since it was first built and it is not recognized in the history of Shopping Center design, it is not an important or exceptional work by the firm, and it cannot be directly associated with Welton Becket, himself. While the shopping complex retains integrity of location, setting and some sense of feeling and association due to its continued function as an open-air Shopping Center, its integrity of design, materials and workmanship has been significantly compromised due to extensive alterations and additions.

At the state level, the Century City Shopping Center is not associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1); nor is it associated with lives of persons important in our past (Criterion 2). Extensive alterations and additions have significantly compromised its integrity of design, materials and workmanship, detracting to a great degree from the Century City Shopping Center's original characteristics of type and method of construction. While the Century City Shopping Center is the product of an important creative individual's firm, Welton Becket and Associates, it cannot be directly associated with Welton Becket, himself. The Century City Shopping Center is not recognized in the published literature as an important work in the history of shopping century design, it is not recognized as important or exceptional work by the firm, and it cannot be directly associated with Welton Becket, himself. Therefore, the Century City Shopping Center is not eligible under Criterion 3. It is not eligible under Criterion 4 because it has not yielded, nor is it likely to yield, information important in prehistory or history.

At the local level, the Century City Shopping Center is not considered potentially eligible as a Los Angeles Historic-Cultural Monument under any of the City's evaluation criteria. It does

not reflect or exemplify the broad cultural, political, economic or social history of the nation, state or City (community); nor is the building identified with historic personages or events in the main currents of national, state, or local history. Due to extensive alterations and additions, the Shopping Center no longer embodies the distinguishing architectural characteristics of an architecture-type specimen or period (Modern Shopping Center of the 1960s), nor is it valuable for the study of a style or method of construction, and it does not possess high artistic values. While the Shopping Center's location does reflect Becket's original design intent with regard to land use, the master plan was only partially completed. The Shopping Center received little recognition at the time of its completion, it is not an important work by the firm, and it cannot be directly associated with Welton Becket, himself. Therefore, the Century City Shopping Center is not eligible for listing in the Los Angeles Historic-Cultural Monument register.

Portions of the Century City Shopping Center are also proposed for removal under the project. As described above, buildings within the Shopping Center appear ineligible for listing in the federal, state, or local registers. For the purposes of CEQA, it is not considered a historic resource as defined by the CEQA Guidelines, Section 15064.5(a). Therefore, no impact to historical resources would result from the demolition of structures within the Century City Shopping Center.

(c) 1930 Century Park West Building

The Modern bank building located at 1930 Century Park West, designed by the Pasadena firm of Ladd and Kelsey, was also found ineligible for federal, state, or local listing. It has not achieved exceptional importance within the last fifty years within the context of Southern California commercial architecture of the 1960s, Ladd and Kelsey's built works, or the Century City master plan. It was not clearly planned as a specific component of the 1961 master plan for Century City; however, it does fall within the 1958-1975 period of significance for the master plan and appears to generally conform to the plan in its scale, location and function. Although it is a product of a notable local architectural firm, Ladd and Kelsey, it does not appear to be an exceptionally important or outstanding work by the firm, which is most widely known for the award-winning design of the Pasadena Art Museum.

The Modern bank building is not associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage (Criterion 1); nor is it associated with lives of persons important in our past (Criterion 2). Overall, while the building located at 1930 Century Park West retains integrity of location, setting, and feeling, it no longer retains its association with Prudential Savings and Loan Association. Additionally, due to the loss of substantial historic fabric on the building's upper stories, the original drive through bank, and the building's primary entrance area, the property's physical integrity relative to design, materials, and workmanship has been significantly compromised, detracting from its architectural significance. The building is typical of the work of Ladd and Kelsey in its

centralized plan and use of reinforced concrete and glass, but is not an outstanding work by the firm. The building was not a specific component of the 1961 master plan for Century City, although it generally conforms to the plan in its scale and use. Therefore, 1930 Century Park West is not eligible for the California Register under Criterion 3. In addition, it has not yielded, nor is it likely to yield, information important in prehistory or history (Criterion 4).

At the local level, 1930 Century Park West is not considered potentially eligible as a Los Angeles Historic-Cultural Monument under any of the City's evaluation criteria. It does not reflect or exemplify the broad cultural, political, economic or social history of the nation, state or City (community); nor is the building identified with historic personages or events in the main currents of national, state, or local history. The building was not clearly planned as a specific component of the 1961 master plan for Century City. Furthermore, substantial alterations and additions have compromised its architectural integrity, detracting from its architectural significance. While the building does embody representative characteristics associated with Modern commercial architecture in Los Angeles during the 1960s in its use of reinforced concrete and glass, it is not a distinctive or outstanding example of an architectural-type specimen (commercial bank building with a centralized plan) nor is it considered valuable for the study of a style or method of construction. While the building is the product of a notable local architectural firm, Ladd and Kelsey, it has not been recognized as a distinctive or outstanding work by the firm.

The 1930 Century Park West building is also intended to be removed. As indicated above, this building appears ineligible for listing in the National Register, California Register, or for local City of Los Angeles Historic-Cultural Monument designation. For the purposes of CEQA, the building is not considered a historic resource as defined by the CEQA Guidelines Section 15064.5(a). Therefore, no impact to historical resources would result from the demolition of the building.

(2) Cumulative Impacts

Four projects identified among the related projects are located within Century City and have been considered in evaluating potential cumulative historic impacts, including Related Project No. 15 – ABC Entertainment Center at 2000 Avenue of the Stars, Related Project No. 16 – St. Regis Redevelopment Project at 2055 Avenue of the Stars, Related Project No. 44 – 483-unit condominium project at 10131 Constellation Boulevard, and Related Project No. 48 – 350-unit apartment building at 10000 Santa Monica Boulevard. In three of the four cases (Related Projects Nos. 15, 16, and 48), these pre-existing improvements have already been demolished and removed, while Related Project No. 44 is fully entitled and the right to demolish pre-existing improvements already conferred. Three of the four projects (Related Projects Nos. 15, 16, and 44) were evaluated via environmental impact reports and none disclosed that the pre-existing improvements on the respective sites had merit as potential historic resources. In

addition, the site located at 10000 Santa Monica Boulevard is vacant. Therefore, none of these existing related project sites are considered potential historic resources, and the demolition of existing improvements on these related project sites would not contribute to a cumulative impact on historic resources, when considered in conjunction with the proposed project.

Of the remaining related projects, the Beverly Hilton Project located at the southwest corner of Santa Monica Boulevard and Wilshire Boulevard also includes buildings designed by the architectural firm of Welton Becket and Associates that may be removed. Nonetheless, the Los Angeles area includes a substantial number of notable, extant buildings designed by the architectural firm of Welton Becket and Associates. Notable buildings in the Los Angeles area designed by Welton Becket and Associates include the Capitol Records Building, the Music Center, the Cinerama Dome, the General Petroleum building (now known as the Pegasus Building and listed on the National Register), Bullock's Pasadena (now occupied by Macy's and listed on the National Register), the Santa Monica Civic Auditorium and the Beverly Hills Hilton Hotel. Additional notable buildings in the Los Angeles Area designed by the architectural firm of Welton Becket and Associates include the Prudential/Museum Square Building (1948) located at 5757 Wilshire Boulevard, the Standard Federal Savings Building (California Federal) (1953) located at 601 Wilshire Boulevard, the Los Angeles Memorial Sports Arena (1959), the Equitable Life Building (1969) at 3435 Wilshire Boulevard, and the Northrop Building (1970) within Century City. These and other numerous existing buildings in the Los Angeles area demonstrate that a large body of distinctive and representative buildings designed by the architectural firm of Welton Becket and Associates have and will remain. Many of the buildings designed by Welton Becket and Associates, including the Capitol Records Building, the Cinerama Dome and the Music Center have recently been subject to substantial improvements to ensure they would be preserved for future generations. In addition, a substantial number of buildings in Los Angeles and elsewhere designed by Welton Becket and Associates remain that are representative of the corporate Modern style, including anchor stores, office buildings, as well as educational and cultural institutions. Thus, given the substantial body of work by the architectural firm of Welton Becket and Associates that still remains intact, cumulative impacts on historic resources would be less than significant.

(3) Mitigation Measures

(a) 1801 Avenue of Stars Building

Mitigation Measure C-1: Recordation. Prior to the issuance of a demolition permit, the 1801 Avenue of the Stars building shall be documented in large format black-and-white photographs. This documentation shall be prepared by a qualified photographer experienced in Historic American Building Survey (HABS) photography. The building exterior, representative interior spaces, character defining features, sculptural relief, as well as the property setting and contextual views shall be documented. Original archival prints and

negatives of the photographs shall be submitted to the Library of Congress, National Park Service. Original archival prints shall also be submitted to the California Office of Historic Preservation. Non-archival copies of the prints shall be distributed to the City of Los Angeles Cultural Heritage Commission, the Los Angeles Department of City Planning, the Los Angeles Conservancy and the Los Angeles Public Library (Main Branch).

Mitigation Measure C-2: Relocation. The large wall-sized aluminum sculptural relief created by Bernard Rosenthal, Sculptor, located on the building's east-facing interior lobby wall is part of the original design of the building and should be salvaged and relocated. It would be relocated to an appropriate context within or outside of Century City thereby commemorating its significance for posterity. A relocation plan shall be prepared by a qualified professional conservator and implemented in accordance with nationally recognized conservation guidelines including the Code of Ethics and the Guidelines for Practice of the American Institute for Conservation of Historic and Artistic Works.

(4) Level of Significance After Mitigation

The analysis of potential impacts to historic resources conservatively concludes that while clear arguments against the eligibility of 1801 Avenue of the Stars for the California Register and as a Los Angeles Historic-Cultural Monument can be made, a conservative assessment may conclude that 1801 Avenue of the Stars is a potential historic resource, as it was designed by the architectural firm of Welton Becket and Associates and is a representative example of an architectural type-specimen, a corporate Modern high-rise office building of the 1950s-1960s. The proposed project would remove the 1801 Avenue of Stars building, which would result in a substantial adverse change to a potential historical resource based on the conservative assessment provided above. Under CEQA, the mitigation measures proposed would reduce, but not eliminate, the significant impacts of the project to a potential historical resource, 1801 Avenue of the Stars. The mitigation measures outlined above, including photographing the building and relocation of the aluminum sculpture are important to assure that information that contributes to the history of the City of Los Angeles is retained for future generations. After implementation and completion of these mitigation measures, impacts to this historic resource would be minimized but based on a conservative assessment would still be significant and unavoidable.

d. Geology and Soils

(1) Project Impacts

(a) Geologic Hazards

(i) Fault Rupture

The project site is not located within a State-designated earthquake fault zone. However, the northeast portion of the project site is located within a City-designated fault rupture study area. Based on current available geologic information, no active or potentially active faults with the potential for surface fault rupture are known to be located directly beneath or projecting toward the project site. The closest active fault to the project site is the Santa Monica Fault located approximately 300 feet northwest of the site. The closest potentially active fault to the project site is the Overland Fault located approximately 0.8 mile west-southwest of the site. As there are no active or potentially active faults located on the project site, the potential for surface fault rupture is considered low. Therefore, the proposed project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. Impacts would be less than significant. No mitigation measures are required.

(ii) Ground Shaking

As part of the Geotechnical Investigation, ground motions were postulated corresponding to a Design Basis Earthquake (DBE), which corresponds to a 10 percent probability of exceedance during a 50-year period, and an Upper Bound Earthquake (UBE), which corresponds to a 10 percent probability of exceedance during a 100-year period. The site-specific peak ground acceleration (PGA) for the DBE and UBE was estimated by a Probabilistic Seismic Hazard Analysis (PSHS). The estimated PGA for the DBE is 0.51 g (0.51 times the acceleration of gravity), while the estimated PGA for the UBE is 0.65 g. As with any new project in the State of California, construction would conform to the current seismic design provisions of the Uniform Building Code (UBC). Southern California is located within the UBC's Seismic Zone 4 which is the most restrictive zone in the U.S. with regard to building design and structural requirements to minimize potential damage during earthquakes. Construction of the proposed project would also be required to conform with the seismic safety requirements in the LAMC. Based on the results of the Geotechnical Investigation, the proposed project is feasible for development from a geotechnical perspective. Preliminary design recommendations are set forth in the Geotechnical Investigation with regard to seismic design and other geotechnical issues. Therefore, compliance with the UBC, LAMC, and Mitigation Measure D-1 below would ensure that adequate structural protection would be provided in the event of an earthquake, thus reducing impacts from strong seismic ground shaking to a less than significant level.

(iii) Liquefaction

The project site is not located within a State-designated liquefaction hazard zone or City-designated liquefiable area. Nevertheless, a site-specific liquefaction analysis was performed using: 1) the highest groundwater level found at the site, 25 feet below ground surface, which is higher than the reported historic high level; 2) standard penetration test (SPT) results obtained during the field investigation; and 3) the “liquefiable opportunity” PGA published by the CGS for the project area. The liquefiable opportunity PGA for the DBE (which is defined as an event with a 10 percent probability of exceedance during a 50-year period) is 0.34 g for the project site. These results indicate that the soils located at the project site are not susceptible to liquefaction. Therefore, liquefaction is not expected to affect the project site. Impacts would be less than significant and no mitigation measures would be required.

(iv) Subsidence

The historic withdrawal of fluids (such as petroleum and groundwater) has been known to cause ground subsidence. As previously discussed, the project site is located within the Beverly Hills Oil Field and has had a dewatering system in place at 1801 Avenue of the Stars. Between 1955 and 1970, documented subsidence beneath the project site was approximately 0.2 feet. 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. Therefore, subsidence is not expected to adversely affect the project site. Impacts would be less than significant and no mitigation measure would be required.

(v) Other Seismic Hazards

The site is not in a coastal area. Thus, tsunamis are not considered to be a hazard at the site. In addition, the site is not located within an inundation area for an earthquake-induced dam failure. Finally, the site is not located downslope of any large bodies of water that could adversely affect the site in the event of earthquake-induced seiches. Thus, potential impacts associated with these seismic hazards would be less than significant and no mitigation measures would be required.

(b) Subsurface Soils**(i) Sedimentation and Erosion**

Grading activities would include approximately 21,420 cubic yards of cut, 1,895 cubic yards of fill, and 19,607 cubic yards of cut for foundations. Of this grading, approximately 39,132 cubic yards would be expected to be exported. Erosion and sedimentation from exposed soils could potentially occur during construction. However, construction activities would

comply with erosion control measures, including grading and dust control measures, imposed by the City pursuant to grading permit regulations. Specifically, project construction would comply with LAMC Chapter IX, which requires necessary permits, plans, plan checks, and inspections to reduce the effects of sedimentation and erosion. In addition, the project would be required to have an erosion control plan approved by the City of Los Angeles Department of Building and Safety, as well as a Storm Water Pollution Prevention Plan (SWPPP) pursuant to the National Pollutant Discharge Elimination System (NPDES) permit requirements. As part of the SWPPP, Best Management Practices (BMPs) would be implemented during construction to reduce soil erosion and pollutant levels to the maximum extent possible. Therefore, construction-related impacts associated with erosion and sedimentation would be less than significant.

The proposed project may result in a limited degree of soil erosion post-construction. However, in accordance with NPDES requirements, the project would be required to have a Standard Urban Stormwater Mitigation Plan (SUSMP) in place during the operational life of the project, which would assist in reducing on-site erosion. As such, operational impacts associated with erosion and sedimentation would be less than significant.

(ii) Slope Stability

During excavation activities, the sandy alluvial deposits at the project site could be prone to local raveling or caving. Preliminary design recommendations are set forth in the Geotechnical Investigation with regard to slope stability during construction and operation of the proposed project such as the implementation of a temporary shoring system with lagging, and temporary and permanent retaining walls designed for the recommended lateral earth pressures. Therefore, with the incorporation of Mitigation Measure D-1 below, potential impacts from slope instability would be reduced to a less than significant level.

(c) Groundwater

Groundwater was encountered at a depth of 25 feet below the ground surface at 1801 Avenue of the Stars, the location of the proposed residential tower and four level subterranean parking garage. Accordingly, basement levels below 25 feet below ground surface should be designed for hydrostatic pressure or provisions must be taken to protect the structures from hydrostatic pressure. A dewatering system in the form of a subdrain system currently exists beneath the lower level of the existing basement at 1801 Avenue of the Stars. If the existing subdrain is maintained operational, a new subdrain system may not be required. In the event that a new subdrain system is required, recommendations regarding installation of the new subdrain system would be implemented in accordance with the Geotechnical Investigation prepared for the project. At 1930 Century Park West, water seepage was encountered at a depth of 45 feet below the ground surface. The planned finished floor elevation at this location is well above the level of the water seepage encountered. Therefore, dewatering is not likely to be required at this

location. With the incorporation of Mitigation Measure D-1 below, potential impacts from hydrostatic pressure would be reduced to a less than significant level.

(d) Consistency with Applicable Regulations

(i) Alquist-Priolo Earthquake Fault Zoning Act

The project site is not located within a State-designated earthquake fault zone. Therefore, the proposed project would not be subject to special design requirements (i.e., setbacks) or additional studies as required by the Alquist-Priolo Earthquake Fault Zoning Act.

(ii) Seismic Hazards Mapping Act

The project site is not located within a State-designated liquefaction hazard zone. Therefore, the proposed project would not be subject to additional studies as required by the Seismic Hazards Mapping Act.

(iii) Los Angeles General Plan Safety Element

The northeast portion of the project site is located within a City-designated fault rupture study area. However, based on current available geologic information, no active or potentially active faults with the potential for surface fault rupture are known to be located directly beneath or projecting toward the project site. Because there are no active or potentially active faults located on the project site, the potential for surface fault rupture is considered low. Therefore, the proposed project would not conflict with the Los Angeles General Plan Safety Element.

(iv) Los Angeles Municipal Code

The proposed project would be designed and constructed in accordance with all LAMC requirements during design and construction.

(e) Impacts Associated with Landform Alteration

The project site and surrounding area are located in an urbanized area that is relatively flat. No distinct or prominent geologic or topographic features are located at the project site such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. Therefore, no distinct and prominent geologic or topographic features would be destroyed, permanently covered, or materially and adversely modified as a result of the proposed project. Thus, impacts associated with landform alteration would be less than significant and no mitigation measures would be required.

(2) Cumulative Impacts

Impacts associated with geologic and soil issues are typically confined to a project site or within a very localized area and do not affect off-site areas associated with the related projects or ambient growth. Cumulative development in the area would, however, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards. Nevertheless, all projects are subject to established guidelines and regulations pertaining to seismic hazards. As such, adherence to applicable building regulations and standard engineering practices would ensure that cumulative impacts would be less than significant.

(3) Mitigation Measures

Mitigation Measure D-1: Prior to issuance of a grading permit, a qualified geotechnical engineer shall be retained by the Applicant to be present on the project site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations as specified in the Geotechnical Investigation prepared for the proposed project, as well as other recommendations made in any subsequent geotechnical investigations prepared for the project. When appropriate, the geotechnical engineer shall provide structure-specific geologic and geotechnical recommendations which shall be documented in a report to be appended to the project's previous geotechnical reports.

(4) Level of Significance After Mitigation

With implementation of the recommended mitigation measure above, potential impacts associated with geology and soils would be reduced to a less than significant level.

e. Hazards and Hazardous Materials

(1) Environmental Impacts

Construction of the proposed project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the project site. Therefore, impacts from the use of these hazardous substances during construction of the proposed project would be less than significant.

Small quantities of hazardous substances are currently used at the project site, including common cleaning, maintenance, and painting supplies. Operation of the proposed project would involve the continued use of these substances. Additionally, the proposed residential uses would involve the use of typical household cleaning supplies, vehicle maintenance materials, and chlorine and other pool chemicals. The use, storage, and disposal of these substances would be in small quantities and in accordance with applicable laws and regulations and manufacturers' instructions for such products. Therefore, impacts associated with the use of these hazardous substances during operation of the proposed project would be less than significant.

Fluorescent light ballasts are located throughout the project site. It is possible that they contain polychlorinated biphenyls (PCBs). Implementation of the proposed project could result in generation of PCB wastes during demolition and renovation activities. However, potential impacts from PCB-containing fluorescent light ballasts would be reduced to a less than significant level with the incorporation of Mitigation Measure E-1.

Asbestos-containing material (ACM) has been identified in the existing Shopping Center and the office building located at 1930 Century Park West. As such, the demolition of and/or modifications to these buildings would have the potential to release asbestos fibers into the atmosphere if they are not properly stabilized or removed prior to demolition and modification activities. The removal of ACM is regulated by SCAQMD Rule 1403 and therefore would be removed by a certified asbestos containment contractor in accordance with applicable regulations prior to demolition or modification. Implementation of Mitigation Measure E-2 is recommended to ensure compliance with regulatory requirements. For portions of the existing Shopping Center that will not be disturbed, ACM should continue to be managed in place with an asbestos Operations and Maintenance (O&M) Program.

Although no ACM was found during the preliminary screening for ACM for the office building located at 1801 Avenue of the Stars, it is possible that ACM may be present in areas of the office building that were not sampled. Because the project proposes to demolish this building, a comprehensive asbestos survey shall be conducted prior to demolition activities. If ACM is found to be present, it will be removed in compliance with SCAQMD's Rule 1403 as well as all other State and Federal rules and regulations. Implementation of Mitigation Measure E-2 is recommended to ensure compliance with regulatory requirements.

Due to the time frame in which the buildings located at the project site were constructed, it is possible that lead based paint is present. No lead based paint sampling has been conducted at the project site. Since the proposed project would involve both modification to and demolition of existing buildings located on the project site, the potential for lead exposure exists. However, with the implementation of Mitigation Measure E-3, potential impacts from lead exposure would be reduced to a less than significant level.

A 1000-gallon diesel underground storage tank (UST) is located at 1801 Avenue of the Stars. Upon implementation of the proposed project, this UST would be removed. According to Los Angeles Fire Department (LAFD) records, the UST passed a tightness test on February 7, 2003, although the associated piping did not. Therefore, environmental impacts may result from potential soil and/or groundwater contamination from this existing UST. However, potential impacts would be mitigated to a less than significant level with the implementation of Mitigation Measure E-1.

Because the project site is located in a Methane Zone and methane gas was detected at the project site, potentially significant impacts associated with a risk of fire or explosion could occur during construction or operation of the proposed project. Construction workers could potentially be at risk during excavation activities if gases are present in high concentrations. Therefore, appropriate precautionary measures should be taken to ensure construction worker safety. Mitigation Measure E-4 is recommended to ensure that potential impacts to construction workers are reduced to a less than significant level. New buildings and paved areas of the proposed project would be required to comply with the City's Methane Seepage Regulations and the specifications of the Los Angeles Department of Building and Safety (LADBS). Compliance with City's Methane Seepage Regulations would reduce operational impacts to a less than significant level.

Given the depth to groundwater at the project site (approximately 25 to 45 feet) and the subterranean parking proposed, dewatering would likely be required during construction and operation to lower the groundwater level. The quantity of groundwater removed from the project site during construction is not anticipated to create a cone of depression large enough that would allow contaminants from the nearby Beverly Crest Cleaners to migrate toward the dewatering well. In addition, compliance with the NPDES or Industrial Waste Discharge Permit requirements as outlined in Mitigation Measures E-5 and E-6 would be necessary. With implementation, potential impacts from contaminated groundwater during construction and operation of the proposed project would be less than significant.

The proposed residential tower would be 587 feet above grade level and would be required to comply with FAA regulations, including Form 7460-1, Notice of Proposed Construction or Alteration, and lighting or marking of buildings higher than 200 feet above ground level. Compliance with these notification requirements and the incorporation of FAA recommendations would ensure the project would result in an impact that is less than significant with regard to airport safety.

(2) Cumulative Impacts

All development located within the vicinity of the project site would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous

materials. Therefore, with adherence to such regulations, the simultaneous development of the proposed project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

(3) Mitigation Measures

Mitigation Measure E-1: Any Underground Storage Tanks, toxic materials (including but not limited to polychlorinated biphenyl-containing fluorescent light ballasts), contaminated soils, or contaminated groundwater encountered during demolition, excavation, or grading shall be evaluated and excavated/disposed of, treated in-situ (in place), or otherwise managed in accordance with applicable regulatory requirements. If during grading activities visual or olfactory indication of contamination are discovered, grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up measures are implemented so as to render the area suitable for grading activities to resume.

Mitigation Measure E-2: Prior to issuance of demolition permits, the Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that an asbestos survey has been conducted at all existing buildings to be modified or demolished. If asbestos is found, the Applicant shall follow all procedural requirements and regulations of South Coast Air Quality Management District Rule 1403.

Mitigation Measure E-3: Prior to issuance of demolition permits, the Applicant shall submit verification to the City of Los Angeles Department of Building and Safety that a lead based paint survey has been conducted within the existing buildings to be modified or demolished. If lead based paint is found, the Applicant shall follow all procedural requirements and regulations for proper removal and disposal of the lead based paint.

Mitigation Measure E-4: During subsurface excavation activities, including borings, trenching, and grading, Cal-OSHA worker safety measures shall be implemented as required to preclude an exposure to unsafe levels of soil gases, including but not limited to methane.

Mitigation Measure E-5: Prior to issuance of a grading permit for activities involving construction dewatering, evidence shall be provided to the Los Angeles Department of Building and Safety that a valid National Pollutant Discharge Elimination System (NPDES) or Industrial Waste Discharge Permit is in place. The NPDES or Industrial Waste Discharge Permit shall include provision for evaluating the groundwater for potential contamination and, if necessary, the need for treatment of dewatering discharge.

Mitigation Measure E-6: Prior to issuance of a building permit for activities involving permanent dewatering, evidence shall be provided to the Los Angeles Department of Building and Safety that a valid National Pollutant Discharge Elimination System (NPDES) or Industrial Waste Discharge Permit is in place. The NPDES or Industrial Waste Discharge Permit shall include provision for evaluating the groundwater for potential contamination and, if necessary, the need for treatment of dewatering discharge.

(4) Level of Significance After Mitigation

All potentially significant impacts relative to hazards and hazardous materials would be less than significant with implementation of the mitigation measures outlined above.

f. Hydrology and Surface Water Quality

(1) Project Impacts

(a) Construction

During construction, existing buildings and landscaping on the site would be removed for improvements. As a result, underlying soils would be exposed, making the site temporarily more permeable. However, this increase in permeability would not have a substantial impact on existing drainage patterns and flows, particularly since runoff would be properly controlled through the implementation of appropriate construction BMPs.

Construction of the proposed project would involve site preparation activities such as grading and excavation. Grading activities would include approximately 21,420 cubic yards of cut, 1,895 cubic yards of fill and 19,607 cubic yards of cut for foundations. Of this grading, approximately 39,132 cubic yards would be expected to be exported. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the project would be required to obtain a NPDES general construction permit. In accordance with the requirements of the permit, the project would implement a SWPPP, which would specify BMPs and erosion control measures to be used during construction to prevent pollution. While not required at this stage of the project's review process, Section II, Corrections and Additions, of the Final EIR provides a list of BMPs that will be implemented by the project. These BMPs would eliminate or reduce pollutant levels in runoff during construction. In addition, the project would be required to comply with City grading permit regulations which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, with compliance of NPDES requirements including preparation of a SWPPP and implementation of BMPs and

compliance with City grading regulations, the proposed project would not violate water quality standards. Construction-related impacts to hydrology and surface water quality would be less than significant.

(b) Operation

The proposed project would result in a net decrease in impermeable surfaces due to the introduction of new landscaped areas. Specifically, following development of the proposed project, impervious surfaces would constitute approximately 85 percent of the site. This would represent an approximate decrease of 5 percent in impervious areas when compared with existing conditions. However, for purposes of providing a conservative assessment of impacts, it was assumed that the amount of impervious surface on-site would not change relative to existing conditions. Thus, Subareas A and B, would continue to have a runoff flows of approximately 43.0 cfs and 6.8 cfs, respectively, during a 50-year storm event. In addition, the site in its entirety would have a total runoff flow of approximately 49.8 cfs during a 50-year, 24-hour storm event which is equivalent to existing conditions. As runoff during a 50-year, 24-hour storm would not increase relative to existing conditions, the current storm drain system within the adjacent street's would not be negatively affected by the project. Thus, potential impacts on hydrology would be less than significant.

The project would not generate any new sources of polluted runoff. In addition, in accordance with the SUSMP requirements, the project would be required to implement BMPs during the operational phase of the project to reduce the discharge of polluted runoff from the site. While not required at this stage of the project's review process, Section II, Corrections and Additions, of the Final EIR provides a list of BMPs that will be implemented by the project. With compliance with NPDES requirements, impacts associated with water quality would be less than significant.

(2) Mitigation Measures

While the project would not result in significant impacts to hydrology and surface water quality, the following mitigation measures are recommended to ensure compliance with applicable regulations.

Mitigation Measure F-1: The project shall comply with the requirements of the applicable NPDES permit for stormwater discharge and with all applicable requirements of the RWQCB, EPA and local agencies including the City of Los Angeles regarding water quality.

Mitigation Measure F-2: The project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing

0.75 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 shall be provided.

Mitigation Measure F-3: All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as “NO DUMPING—DRAINS TO OCEAN”) and/or graphical icons to discourage illegal dumping.

Mitigation Measure F-4: The legibility of signs and stencils discouraging illegal dumping shall be maintained.

Mitigation Measure F-5: Materials used on site with the potential to contaminate stormwater shall 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.

(3) Cumulative Impacts

The 108 related projects in the vicinity of the site could potentially increase the volume of storm water runoff and contribute to pollutant loading in storm water runoff, resulting in cumulative impacts to hydrology and surface water quality. However, as with the proposed project, the related projects would also be subject to State NPDES permit requirements for both construction and operation. Each project would be required to develop SWPPPs and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to surface water quality. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, cumulative impacts to hydrology and surface water quality would be less than significant.

(4) Level of Significance After Mitigation

Implementation of the mitigation measures provided above would ensure that impacts to hydrology and surface water quality would be less than significant.

g. Land Use

(1) Consistency of the Project with Land Use Plans, Policies and Zoning

The project would be substantially consistent with the goals, objectives and policies of the General Plan Framework, including those set forth in the Land Use, Housing, Urban Form

and Neighborhood Design, Open Space and Conservation, Economic Development, and Transportation Chapters. To summarize, the project would be consistent with the site's Regional Center designation in terms of land use, density and design, and based on its contribution to the existing diversity of uses in Century City by providing new retail, restaurant, entertainment, office, and residential uses, along with open air and pedestrian amenities. The project would also increase the vitality of the Century City area by enhancing the aesthetic appeal of the Shopping Center. The project site is well served by existing infrastructure, transit, and pedestrian amenities, and by promoting pedestrian activity, project development would facilitate a reduction of vehicle trips. The project would also help meet General Plan Framework housing goals by locating housing within a high activity area. Therefore, land use impacts relative to consistency with this plan would be less than significant.

The project would also be consistent with the Transportation Element Bicycle Plan. The project would support the Transportation Element Bikeway Plan by locating residential uses within an urban center and in close proximity to existing non-motor transportation systems. As such, the impact of the project relative to the Bikeway Plan would be less than significant.

The West Los Angeles Community Plan designates the entire project site for Regional Commercial uses. Continued operation of the Shopping Center, including the proposed expansion of related Shopping Center uses and associated parking, would be consistent with this land use designation. In addition, various residential zones correspond to the Regional Commercial designation, thus the proposed residential uses would also be consistent with the site's Community Plan designation. Relative to the general issues addressed in the Community Plan, the Westfield Century City Shopping Center would continue to operate within the existing Shopping Center and adjacent commercial properties and thus would not physically divide or interfere with the surrounding residential community. While the project would introduce new residential uses within the commercial core of Century City, the establishment of mixed use development would support various Community Plan goals. The design of the proposed improvements would enhance the visual character of the Shopping Center, be aesthetically compatible with existing uses on-site, introduce additional pedestrian-scaled commercial development, and generally improve the identity of the area and the Santa Monica Boulevard commercial corridor. Furthermore, the project would not result in significant land use compatibility impacts. The project would also support Community Plan policies pertaining to related issues, such as transportation, in that it would comply with applicable provisions of the Century City North Specific Plan and the West Los Angeles Transportation Improvement and Mitigation Specific Plan and implement necessary parking, access, and intersection improvements. Based on the analysis, the project would not conflict with the land use provisions of the Community Plan. As such, the project's impact relative to the Community Plan would be less than significant.

In accordance with the second phase of the Century City North Specific Plan, the project would be required to obtain a Project Permit, for which specific findings must be made by the City Planning Commission. According to the Los Angeles City Planning Department's August 1, 2007 Trip Allocation Table, 278.605 Cumulative Automobile Trip Generation Potential (CATGP) Trips remain available within the Shopping Center, and 1259.706 Replacement Trips are available for 1930 Century Park West. In addition, the City has acknowledged, through recorded covenants, that demolition of existing development on the 1801 Avenue of the Stars and 1930 Century Park West parcels would result in an additional 4,182.052 and 871.451 Replacement Trips, respectively. Furthermore, additional Transfer Trips would be provided to the project site as needed for the new development. Thus, the project would be consistent with the trip allocations set forth in the CCNSP.

An amendment to the CCNSP is proposed that would formally define the Shopping Center to include 1801 Avenue of the Stars and 1930 Century Park West, together with 10250 Santa Monica Boulevard. As part of this amendment, the heights of all buildings within the redefined Shopping Center, including 1801 Avenue of the Stars and 1930 Century Park West, would be measured from the plaza level; this would be consistent with the CCNSP's current requirement for measuring the heights of structures in the Very Limited Height District No. 1 (1VL) portion of the Shopping Center. Additionally, the amendment proposes to consider the entire property as a unified site, to allow for the transfer of density and CATGP Trips within the site. With approval of this requested CCNSP amendment, the project's building heights and density would comply with LAMC and CCNSP requirements. The designated Core Area of the project site (i.e., the central and eastern portions of the site) would have a post-project FAR of 2.8:1, and the designated Buffer Area (i.e., the western portion of the site along Century Park West) would have an FAR of 1.1:1, thus meeting the respective 6:1 and 4.5:1 FAR restrictions. The overall site would have an FAR of 2.4:1. Additionally, in accordance with Section 7 of the CCNSP, the project would not include any fast food restaurant uses. The proposed project would be required to obtain a Project Permit. With approval of the requested Specific Plan Amendment, the project would be consistent with the CCNSP and thus the necessary findings can be made for the Project Permit. As such, impacts relative to this land use plan would be less than significant.

The commercial uses potentially contemplated for the Shopping Center expansion (e.g., various types of retail shops, restaurants/cafés, and entertainment uses, among others), along with the proposed office uses, associated parking, and signage, are all permitted within the C2 zone. High density multi-family development is also permitted in the C2 zone, as long as it complies with the area, density, parking and other requirements of the R4 zone. The project also requests a new Conditional Use Permit (CUP) per LAMC Section 12.24 to replace the 1988 approval for the on-site sale and service of alcoholic beverages, primarily to clarify that the CUP would apply to the proposed expanded Shopping Center site. The Applicant seeks to increase the number of allowable on-site establishments (i.e., 18 of which 15 have been established to

date), to 26. The establishments serving alcoholic beverages will continue to be a part of a carefully controlled first-class Shopping Center, and appropriate security measures will be implemented. The service of alcoholic beverages has come to be accepted as a normal and desirable complement to food service in fine quality restaurants. As such, the requested CUP approval is in keeping with the operation of the regional Shopping Center.

The project would also necessitate a Zoning Administrator Determination to allow shared use parking among the office, retail, restaurant, and cinema uses in the Shopping Center portion of the site. A parking analysis for the project demonstrates that, due to the mix of uses, parking demand will not exceed the supply of parking provided for the project. Specifically, the on-site parking supply will be adequate to accommodate the demand for parking during non-holiday peak periods and the continued practice of securing off-site parking spaces would ensure that adequate parking would be available during peak periods during the holiday season. With the proposed on-site parking supply, as well as the provision of off-site parking spaces, the supply would be sufficient to accommodate the peak demand.

The project would also be consistent with the City's Methane Zone building regulations. In addition the project would comply with LAMC standards for driveway access, parking stall dimensions, and loading areas. Thus, with approval of the requested discretionary actions, the project would be consistent with the requirements of the LAMC, and no significant land use impacts associated with the City Municipal Code would occur.

(2) Consistency with Regional Plans and Applicable Policies

The project would support the primary Southern California Association of Governments (SCAG) policies set forth in the Regional Comprehensive Plan and Guide. In particular, the project would be consistent with SCAG's adopted population, housing, and jobs forecasts. The project would also represent infill development within an area well served by existing infrastructure and transit facilities. The project would also be substantially consistent with the goals/policies set forth in SCAG's 2004 Regional Transportation Plan and Growth Vision Report.

The project's consistency with the SCAQMD AQMP is addressed in Section IV.B, Air Quality, and project consistency with the Metropolitan Transport Authority (MTA) Congestion Management Plan (CMP) and the West Los Angeles Transportation Improvement and Mitigation Specific Plan (West LA TIMP) is addressed in Section IV.J, Traffic and Circulation, of the Draft EIR. As discussed in these sections of the Draft EIR, the project would be consistent with the AQMP, the CMP and the West LA TIMP.

(3) Conclusion Regarding Impacts on Regulatory Framework

Based on the analysis described above and with approval of the requested actions, the project would be in compliance with all applicable provisions of the General Plan Framework, Transportation Element of the General Plan, West Los Angeles Community Plan, Century City North Specific Plan, and zoning provisions of the LAMC. The proposed project would be consistent with the uses permitted and conform to such building standards as density limitations, height limitations, parking, setbacks, building articulation, and landscaping requirements, with approval of the requested CCNSP amendment. Further, the project would be consistent with the mixed use, regional center character of the CCNSP area, in that it would create an integrated center with a range of shopping and dining choices, entertainment opportunities, outdoor spaces, and amenities, together with a place to live. As such, the proposed project is considered consistent with the regulatory framework relative to land use.

(4) Land Use Compatibility

The proposed project would contribute to the existing diversity of uses in Century City by providing new commercial uses (including retail, restaurant, and entertainment uses), office space, and residential units within the area's high density commercial core. In general, the project would preserve the existing land use relationships in the area as well as the overall character of the neighborhood. The project would also be consistent in terms of scale with existing uses. Building heights at the Shopping Center would be comparable to the heights of the existing on-site structures and would continue to be substantially lower than most of the mid- to high-rise buildings on surrounding properties. Furthermore, the project's design would utilize massing techniques to promote a feeling of openness. While the proposed residential building, at 49 stories, would exceed the height of many buildings within Century City, its location within the core of the high-rise Regional Center would render its size and scale compatible with surrounding high-rise development, which includes a variety of 23-, 28-, 30-, 36-, 39-, and 44-story buildings, as well as the recently approved 47-story towers at 10131 Constellation Boulevard. Furthermore, all of the proposed structures would be consistent with applicable height limitations, with approval of the requested CCNSP amendment to measure the height of all buildings in the Shopping Center from the plaza level.

The nearest single-family neighborhoods are located west of Century Park West, east of Century Park East (in the City of Beverly Hills), and to the northwest across Santa Monica Boulevard. The high-rise portion of the project would be buffered from all of these areas by existing structures. Given the distance of the proposed residential building from nearby single-family neighborhoods and the presence of numerous mid- to high-rise buildings in the immediate vicinity, the project would not be considered out-of-scale or incompatible in relation to any surrounding single-family land use.

The design of the proposed improvements would enhance the visual character of the Shopping Center, be aesthetically compatible with existing uses on-site, and generally improve the identity of the area and the Santa Monica Boulevard commercial corridor. The project would incorporate high design elements with an architectural theme that complements the existing character of the area. The project would reinforce the current pedestrian orientation of the Shopping Center by expanding interior open air areas and walkways. The proposed parking structure would also incorporate an architectural design that complements the existing character of the Shopping Center. Additionally, the project would incorporate attractive lighting, for purposes of providing security and aesthetic enhancements, while also being sensitive to nearby properties. Extensive landscaping throughout the project edges would also be provided. In addition, project signage would be provided in accordance with Code requirements and would be compatible with the architecture of the existing and proposed buildings. Moreover, the project has been designed to be non-intrusive on adjacent uses by providing new enclosed loading facilities, interior trash collection, and primarily underground or rooftop parking.

Westfield Century City Shopping Center would continue to operate within the existing Shopping Center and adjacent commercial properties and thus would not physically divide, disrupt, isolate, or interfere with the surrounding residential community. The project would preserve the existing land use relationships in the area as well as the overall character of the neighborhood.

Construction activities can also be a source of compatibility problems. Construction of the project would result in temporary significant impacts associated with air quality and noise. However, these impacts would be short-term in nature and would be staged to minimize disruption to neighboring streets and properties. Based on the above, the project would not substantially or adversely change the existing relationship between on- and off-site land uses and properties, or have the long-term affect of adversely altering a neighborhood or community through ongoing disruption, division, or isolation.

(5) Cumulative Impacts

The 108 related projects identified in the project vicinity generally consist of infill development and redevelopment of existing uses, and development of the related projects is expected to occur in accordance with adopted plans and regulations. It is reasonable to assume that the projects under consideration in the area surrounding the project site would implement and support important local and regional planning goals and policies. All new development within the CCNSP area or Century City South Specific Plan (CCSSP) area must comply with the CATGP Trip limitations of these Specific Plans. Furthermore, the use of replacement and transferred CATGP Trips would limit new development within Century City. It is anticipated that any new projects would be subject to the project permit approval process and would incorporate any mitigation measures necessary to reduce potential land use impacts. Therefore,

no significant cumulative land use impacts are anticipated. However, since CATGP Trips can be replaced and transferred among and between properties in these Specific Plan areas, new development and land use changes could occur in patterns that are not possible to anticipate at the present. With the mandatory implementation of the CCNSP and CCSSP, no cumulatively considerable development is anticipated as a result of the project or as a result of development that would occur from CATGP Trip exchange and/or replacement.

One related project (Related Project No. 44), located at 10131 Constellation Boulevard, is within the immediate vicinity of the project site. This project consists of 483 multi-family housing units within several mid- to high-rise structures. Located within the commercial core of Century City and distant from nearby single-family areas, this related development is not expected to encroach on any existing neighborhood. As such, the project in combination with this related project would not contribute to a cumulative impact with respect to land use compatibility.

(6) Mitigation Measures

The proposed project would not result in significant impacts associated with or consistency with regulatory land use plans and guidelines, land use compatibility, or the division of an existing community. Therefore, no mitigation measures would be required.

(7) Level of Significance After Mitigation

With approval of the requested CCNSP amendment, the proposed project would be consistent with the regulatory framework relative to land use, including the General Plan Framework, Transportation Element of the General Plan, West Los Angeles Community Plan, Century City North Specific Plan, LAMC, and other applicable local and regional plans. The project would also be compatible with the land use, scale, density, and intensity of surrounding development and would not divide or disrupt an established community. Therefore, the proposed project would result in less than significant impacts relative to land use regulations and compatibility. No significant and unavoidable land use impacts would occur.

h. Noise

(1) Construction

Noise disturbances would occur during site preparation activities and the subsequent construction of on-site structures. Construction would require the use of a number of pieces of heavy equipment such as bulldozers, backhoes, cranes, loaders, and concrete mixers. In addition, both heavy- and light-duty trucks would be required to deliver construction materials to and export construction debris from the site.

Construction noise levels were estimated based on an industry standard sound attenuation rate of 6 decibels (dB) per doubling of distance for point sources (e.g., construction equipment). Within the analysis, all construction equipment was assumed to operate simultaneously and was assumed to be located at the construction area nearest to the affected receptors. These assumptions represent the worst-case noise scenario. In addition, noise from different construction phases which have the potential to occur simultaneously were added together to provide a composite construction noise level. Noise from construction would cause the ambient noise level to exceed the 5-dBA significance threshold at all sensitive receptors during various durations of the construction period, although none of the sensitive receptors will experience significant noise impacts for the entire duration of the construction period. Nevertheless, construction-period noise impacts would be significant without incorporation of mitigation measures.

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the project site throughout the project's construction period. While construction workers would arrive from many parts of the region, and thus different directions, haul trucks and delivery trucks would generally access the site via planned staging areas that are anticipated to occur off of Santa Monica Boulevard and Constellation Boulevard. Haul and delivery trucks are expected to access the project site primarily via the following route: (1) from either Santa Monica Boulevard, Avenue of the Stars or Constellation Boulevard to southbound Avenue of the Stars, (2) onto westbound Pico Boulevard, (3) onto southbound Overland Avenue, (4) onto I-10 Santa Monica Freeway. Another possible route may be via Santa Monica Boulevard to I-405 Freeway. Construction traffic would not occur during the noise-sensitive late evening and nighttime hours.

Construction-related truck staging would generally occur at the north, east, and south side of the project site including along Santa Monica Boulevard north of the site, along Constellation Boulevard south of the site, and along the service tunnel driveway east of the site. The major noise would be trucks queuing and idling up to the staging areas. The construction truck staging at the service tunnel driveway will have no significant noise impacts since much of the staging would occur within an enclosed structure. To represent a worst-case scenario, the analysis assumed that there would be 20 construction trucks lined up the entire length of Santa Monica Boulevard and Constellation Boulevard along the project site. The construction truck queuing and idling along Constellation Boulevard would generate a noise level of 68 dBA (L_{eq}) at the nearest residential receptor location R1, which would be 3 dBA above the existing lowest daytime ambient noise level of 65 dBA, during allowable construction hours (i.e., 7:00 A.M. to 9:00 P.M. on Monday to Friday and 8:00 A.M. to 6:00 P.M. on Saturday). At the Plaza Hotel, receptor location R6, the construction truck noise would be 67 dBA, which would be 4 dBA above the existing measured daytime ambient noise level at that location. In addition, construction trucks queuing could extend onto Avenue of the Stars. Estimated noise from construction truck queuing and idling at the planned/future residential development at

10131 Constellation Boulevard would also be less than 5 dBA above the existing ambient noise level. The construction truck queuing and idling along Santa Monica Boulevard would generate a noise level of 66 dBA (L_{eq}) at R3, the nearest noise sensitive receptor north of the project site, which would be 1 dBA above the existing measured daytime ambient noise level of 65 dBA. The residential uses and the Los Angeles Country Club (golf course) on Club View Drive north of Santa Monica Boulevard, R4, would be partially shielded from the construction truck queuing on Santa Monica Boulevard by existing buildings located on the north side of Santa Monica Boulevard. The construction truck traffic noise level at R4 would be 58 dBA, which is consistent with the existing daytime ambient noise level. As these fall below the 5 dBA significance threshold, impacts associated with construction staging would be less than significant.

(2) Construction Vibration

Construction operations can generate varying degrees of ground vibration, depending on the construction procedures and the equipment used. Ground-borne vibration decreases rapidly with distance. With regard to the proposed project, high levels of ground-borne vibration would be generated primarily during site clearing and grading activities on-site and by off-site haul truck travel. Ground-borne vibration during project construction would range from 0.003 to 0.089 inch/sec peak particle velocity (PPV) at 25 feet from the source of activity. At 100 feet from the source of activity, vibration velocities would range from 0.001 to 0.011 inch/sec PPV. The closest sensitive receptor (R1) to the construction site represents the existing residential homes west of the project site along Century West Parkway. This receptor is located approximately 100 feet from the closest edge of the construction site. The residential uses represented by this location would likely experience ground vibration levels of 0.01 inch/second PPV during the use of major construction equipment such as large bulldozers and loaded trucks during the construction of the new parking facility (Phase B). At the nearest non-residential receptor (R5), the existing office building east of the project site, PPV vibration levels of approximately 0.03 inch/second would result from the use of large bulldozers and loaded trucks. As each of these values is below the 2.0 inch/sec PPV significance threshold, vibration impacts associated with construction would be less than significant and no mitigation measures are required.

(3) Operational Noise (Post-Construction)

With respect to project impacts to neighboring noise-sensitive receptor locations, project-specific noise sources considered herein include off-site roadway noise; on-site mechanical equipment/point sources (i.e., loading dock and trash pick-up areas); parking facilities; and rooftop helipad-related noise.

(a) Off-Site Roadway Noise

Daily trip generation attributable to the project site would be increased by 5,922 trips for a typical weekday and 7,466 trips for a typical weekend day, when compared to existing conditions, as a result of project development. This increase in daily trips and associated potential changes to local traffic distribution patterns could cause noise level increases along some local roadway segments. As such, the roadway traffic volumes under the proposed project were analyzed to determine if any traffic-related noise impacts would occur as result of project improvements. For a typical weekday the maximum increase in project-related traffic noise levels would be 0.3 dBA, which would occur along Century Park West, between Santa Monica Boulevard and Constellation Boulevard. For a typical weekend day, a maximum noise increase of 0.9 dBA would occur along Century Park West, between Santa Monica Boulevard and Olympic Boulevard, due to project-related traffic. In addition, the largest cumulative traffic-related noise impact is anticipated to occur along the segment of Veteran Avenue, North of Santa Monica Boulevard, where the roadway noise level increase would be 1.9 dBA Community Noise Equivalent Level (CNEL), during a typical weekend day. As these increases fall well below the 5 dBA CNEL significance threshold, both project-level and cumulative roadway noise level increases would be less than significant.

(b) Stationary Point-Source Noise**(i) Mechanical Equipment**

The proposed project would likely require building mechanical heating, ventilation, and air conditioning (HVAC) equipment to condition and ventilate the indoor air environment. This equipment would be expected to include air handling units, condenser fans, exhaust fans (for buildings and parking structures) and an emergency generator to support the intended function of the proposed structures. Project design features, including enclosure or screen/parapet walls, would ensure that all equipment noise levels would comply with the City of Los Angeles Noise Ordinance requirements (i.e., noise levels would be a maximum 5 dBA above the ambient noise levels). Thus, impacts associated with mechanical equipment would be less than significant.

(ii) Loading Dock and Refuse Collection Areas

The proposed project would include new and improved loading docks and refuse collection areas. All new loading docks and refuse collection areas would be located in the subterranean parking level, which will not have any unobstructed openings that face toward any noise-sensitive receptor location. Therefore, noise level increases would not exceed the 5 dBA equivalent sound level (L_{eq}) (1-hour) significance threshold at the closest or any other off-site noise-sensitive receptor location. As such, impacts would be less than significant, and no mitigation measures would be required.

(iii) Parking Facility Noise Levels

The proposed project would include the following parking facilities: the existing semi-subterranean parking area (two levels) below the Shopping Center, new rooftop parking above the central retail areas, a new parking facility at 1930 Century Park West (five levels plus rooftop parking and two subterranean levels) and a newly expanded and reconfigured subterranean parking area at 1801 Avenue of the Stars (four subterranean levels). The new five level parking structure at 1930 Century Park West would be fully enclosed with a solid concrete wall along Century Park West, which would shield parking structure related noise at the nearby residential homes to the west of the project site. In addition, there would be parking at the roof level, which would have a parapet wall at the perimeter.

Various noise events would occur periodically from the parking facilities, including activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 65 dBA at a distance of 25 feet. Car alarm and horn noise events generate maximum noise levels as high as 83 dBA at a reference distance of 25 feet. At the nearest sensitive receptor locations R1 and R2, car alarm noise emanating from rooftop parking at the 1930 Century Park West structure would likely reach a 59 dBA maximum noise level (L_{max}) and 51 dBA (L_{max}), respectively. The estimated noise levels would exceed the current lowest L_{eq} nighttime ambient levels by 7 dBA and 9 dBA at sensitive locations R1 and R2, respectively. The estimated noise levels are below the 10 dBA threshold of significance for maximum noise (L_{max}) levels. Therefore, the rooftop parking related car alarm noise impacts would be less than significant.

The car alarm sound levels at the receptors resulting from cars parked within the rooftop parking area above the new retail stores would be below the current nighttime ambient noise levels, with the exception of ambient noise levels at receptors R2, R5, and R6. At receptors R2 and R6, the estimated noise levels due to the parking structure operation would exceed the lowest nighttime ambient noise level by up to 5 and 6 dBA, respectively. The estimated parking structure related noise at receptor R5 would exceed the lowest daytime ambient noise level by up to 3 dBA. Receptor R5 is a commercial office building, which is not likely to operate or be occupied during late night hours. The estimated parking related noise levels are below the 10 dBA threshold of significance for maximum noise (L_{max}) levels. Therefore, car alarm noise impacts associated with the rooftop parking area above the retail uses would be less than significant, and no mitigation measures would be required. Based on its subterranean and enclosed location, the expanded parking area at 1801 Avenue of the Stars would not result in any noise impacts at any noise-sensitive receptor location.

(iv) Emergency Rooftop Helipad Noise Levels

The proposed new residential building with a height of up to 579 feet above the plaza level would require an emergency helipad pursuant to LAMC requirements. Use of the helipad would be for emergency purposes only. Thus, based on the infrequent and emergency nature of such a use, adverse noise impacts related to helipad uses would be less than significant.

(v) Composite Noise Level Impacts from Proposed Project Operations

An evaluation of noise from all proposed project sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum project-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. The overall sound environment at the areas surrounding the project is comprised of contributions from each individual noise source associated with the typical daily operation of the proposed project. Primary noise sources associated with the project would include traffic, mechanical equipment, parking facility and loading dock/refuse collection. Based on a review of the noise-sensitive receptors and the project's noise sources, the only noise-sensitive locations where composite noise impacts could occur are residential uses west of Century Park West (R1 and R2). Due to a combination of distance and the presence of intervening structures that would serve as noise barriers, the only project noise source that could potentially affect the other noise-sensitive locations included in this analysis is roadway noise.

Project-related traffic is expected to increase the traffic-related noise by a maximum of 0.9 dBA (CNEL) along Century Park West, between Santa Monica Boulevard and Olympic Boulevard, which is represented by noise receptor R1. Project-related mechanical equipment would be shielded from all noise sensitive receptors through project design features and would also be designed to meet the City's Noise Ordinance (i.e., allowing a maximum of 5 dBA above the lowest ambient noise levels or the City's presumed ambient noise levels). The mechanical equipment related noise was analyzed in terms of hourly L_{eq} . Therefore, a conversion from L_{eq} to CNEL is made in order to be added to the traffic noise level. As the lowest measured hourly L_{eq} ambient noise levels at R1 and R2 (52 dBA and 42 dBA, respectively) are at least 15 dBA lower than the measured 24-hour CNEL levels (recorded 69 dBA at R1 and 57 dBA at R2). Therefore, it is anticipated that by meeting the City's Noise Ordinance in terms of hourly L_{eq} (maximum of 5 dBA above the lowest ambient noise levels), the project mechanical-related noise in terms of CNEL would be approximately 10 dBA below the existing ambient noise levels. With respect to the parking structure at 1930 Century Park West, the parking structure is fully enclosed (i.e., subterranean parking garage) therefore parking related noises will be insignificant. However, there would be parking-related noise at the rooftop parking level, which would contribute to the overall ambient noise levels at receptors near the facility. The rooftop parking activities are estimated to generate noise levels of 59 dBA (L_{max}) at R1 and 51 dBA (L_{max}) at R2. Because of the intermittent/infrequent noise events (e.g. car alarm and horn)

associated with the parking facilities, the parking facility-related noise in terms of CNEL at the nearest receptors, R1 and R2, are estimated to be more than 10 dBA below the existing CNEL levels of 69 dBA at R1 and 57 dBA at R2, respectively. As previously mentioned, the loading docks and refuse collection areas would be located within enclosed buildings in the subterranean parking level, which will not have any unobstructed openings that face toward any noise-sensitive receptor location. Therefore, noise associated with the loading docks and refuse collection transference to the outside would be negligible and would not increase the overall ambient noise levels.

In summary, at the residential uses west of Century Park West (receptors R1 and R2), project-related traffic is expected to increase the ambient noise by maximum of 0.9 dBA (CNEL). The mechanical and parking facility related noise are expected to be well below the existing ambient noise level (i.e., minimum 10 dBA CNEL). Therefore, the overall noise level from all project sources will have a less than 1.0 dBA CNEL contribution to the composite noise environment. Overall, relative to the existing noise environment, operation of the proposed project is estimated to increase the ambient sound level at the nearest noise sensitive receptors (R1 and R2) by less than 2 dBA (CNEL), which is considered less than perceptible. Composite noise impacts at all other receptors are expected to be less than 1 dBA (CNEL). As such, the composite noise level impact due to the proposed project would be less than significant.

(c) Vibration Associated with Project Operations

The proposed project will include typical residential and commercial-grade stationary mechanical and electrical equipment such as air handling units, condenser units, exhaust fans, and electrical emergency power generators, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking facilities, on-site refuse/delivery truck activity, and on-site loading dock/refuse collection area activity. Vibration levels were analyzed to assess potential impacts at the nearest adjacent structures (represented by receptor R5), located approximately 50 feet away from a proposed parking facility.

The estimated project vibration levels of 0.001 inch/second at the nearest receptor (R5) are below the existing site ambient vibration levels of 0.002 inch/second. In addition, the potential vibration impacts from all proposed project sources at the closest off-site structures would be less than the perceptibility significance threshold of 0.01 inch/second root mean square (RMS) velocity. As such, vibration impacts associated with operation of the project would be below the significance threshold. Thus, impacts would be less than significant and no mitigation measures would be required.

(4) Cumulative Impacts

The potential for noise impacts to occur are specific to the location of each related project as well as the cumulative traffic on the surrounding roadway network. While the majority of the related projects are located a substantial distance from the project site, there are several in the vicinity, including the 10131 Constellation Boulevard project, the ABC Entertainment Center project, and the 2055 Avenue of the Stars project. Of these, the only one with the potential for construction activities to occur concurrently with project construction is 10131 Constellation Boulevard. Based on the location of construction activities at both sites, short-term cumulative construction noise impacts at the Century Plaza Hotel (receptor R6) could occur. In addition, should the project located at 2055 Avenue of the Stars have overlapping construction with the proposed project, it would also contribute to significant cumulative construction noise impacts. Thus, even with proposed mitigation measures, if nearby related projects were to be constructed concurrently with the proposed project, significant and unavoidable cumulative construction noise impacts would result.

Due to the rapid attenuation characteristics of ground-borne vibration, cumulative construction- or operational-period ground-borne vibration impacts would not occur.

Relative to operational noise, as under existing conditions, each of the related projects would generate stationary source and mobile source noise as a result of ongoing day-to-day operations. However, the related projects consist of general residential, retail, commercial, and institutional uses, which are not typically associated with excessive exterior noise. Nevertheless, each project would produce traffic volumes that are capable of generating roadway noise impacts. Cumulative traffic volumes would result in a maximum increase of 1.7 dBA CNEL along the segments of Empyrean Way east of Avenue of the Stars, and Veteran Avenue north of Santa Monica Boulevard, on a typical weekday; and a maximum increase of 1.9 dBA CNEL along the segment of Veteran Avenue north of Santa Monica Boulevard on a typical weekend day. As these noise level increases would be below the 3 dBA CNEL significance threshold, roadway noise impacts associated with cumulative traffic volumes would be less than significant.

Due to Los Angeles Municipal Code provisions that limit stationary source noise from items such as rooftop mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project. For this reason, on-site stationary noise produced by any related project would not be additive to project-related noise levels. As the project's composite stationary-source impacts would be less than significant, composite stationary source noise impacts attributable to cumulative development would also be less than significant. In addition, based on the location of the proposed project relative to the related projects (i.e., with intervening buildings and roadways), the location of sensitive receptors, and the parking-related noise levels that would result from the project, significant

cumulative impacts associated with parking-related noise sources would not occur. In summary, cumulative operational noise impacts would be less than significant.

(5) Mitigation Measures

Construction-related noise has the potential to result in significant impacts at sensitive receptors. Thus, the following measures are recommended to minimize construction-related noise impacts:

Mitigation Measure H-1: During the initial stage of construction at 1930 Century Park West (site demolition and site preparation/excavation), a temporary, continuous and impermeable 10 ft high sound barrier wall shall be erected at the project construction site along Century Park West.

Mitigation Measure H-2: Exterior construction activities shall be limited to Monday through Friday from 7:00 A.M. to 6:00 P.M., and from 8:00 A.M. to 6:00 P.M. on Saturdays.

Mitigation Measure H-3: Loading and unloading of heavy construction materials shall be located on-site and away from noise-sensitive uses, to the extent feasible.

Mitigation Measure H-4: Staging of haul trucks shall not occur along Century Park West.

Mitigation Measure H-5: The Applicant shall designate a construction relations team to serve as a liaison with surrounding property owners. The liaison shall be responsible for responding to any concerns regarding construction noise. The liaison's telephone number(s) shall be prominently displayed at multiple locations along the perimeter of the project site.

To reduce the noise impact upon the future residents of the proposed residential uses, the following mitigation measure is recommended:

Mitigation Measure H-6: For the proposed residential uses, all exterior walls, including exterior windows, shall be constructed with construction assemblies that have a minimum Sound Transmission Class rating of 35. The Applicant shall retain the services of an acoustical engineer with expertise in design of building sound isolations, who shall submit a signed report indicating that the proposed building design meets the sound isolation requirements set forth by the City's building code.

(6) Level of Significance After Mitigation**(a) Construction**

The noise reduction measures prescribed in Mitigation Measure H-1 would typically achieve a minimum 10-dBA reduction along residential properties on the west side of the Century Park West where the rear yards of homes would face the future parking facility. This would reduce the maximum noise level increase of 18 dBA that would occur at the closest residential property line during site demolition and the initial stage of grading/excavation to approximately 8 dBA. Existing mature vegetation along the west side of Century Park West would also reduce noise levels. Mitigation Measure H-2 would preclude construction-period noise impacts from occurring during the noise-sensitive nighttime periods, or at any time on Sundays. Noise level reductions attributable to Mitigation Measures H-3 through H-5 and project design features (e.g., use of noise mufflers and on-site storage of construction equipment) are not easily quantifiable. However, implementation of such measures would reduce the noise level impacts associated with construction activities to the extent practicable. Nevertheless, project construction activities would intermittently increase the daytime noise levels at the noise sensitive receptors during the site demolition and initial stages of site grading/excavation activities by more than the 5-dBA significance threshold. As such, noise impacts during construction are concluded to be significant and unavoidable. Cumulative construction noise impacts would also remain significant after mitigation.

(b) Operations

Operational noise impacts on off-site receptors would be less than significant. However, implementation of Mitigation Measure H-6 would ensure that on-site residents would not be exposed to inappropriately high noise levels from off-site activity (i.e., vehicle traffic on Santa Monica Boulevard and Avenue of the Stars). Thus, potential noise impacts associated with the introduction of residential uses into an existing urban environment would be less than significant.

i. Public Services**(1) Fire Protection****(a) Environmental Impacts**

Construction activities may temporarily increase the existing demand on fire protection and emergency medical services. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response, and private fire monitoring personnel would be trained with regard to the sequence of operations guidelines, which include, but are not

limited to, the management of life safety systems and facilities. Fire suppression equipment specific to construction would be maintained on-site. Project construction would comply with applicable codes and ordinances, such that any additional demand for fire services would not exceed the current capabilities of the LAFD. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities may involve temporary lane closures for utility construction (generally only one lane so that through access on all roadways serving the project site would be maintained). Other implications of construction-related traffic include reduced travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction. As such, construction activities could increase response times for emergency vehicles to local businesses on Santa Monica Boulevard, Avenue of the Stars, Century Park West, and Constellation Boulevard, due to travel time delays to through traffic. However, upon implementation of a Construction Staging and Traffic Management Plan, traffic impacts from construction activity would be less than significant.

The project would generate approximately 553 new residents and based on a generation factor of 0.0735 incidents per capita, the residential component of the proposed project could potentially generate 41 additional incidents per year. In addition, the project would result in a net increase of approximately 520 employees. Furthermore, development would result in an increase in visitors associated with the Shopping Center. Thus, project implementation would increase the demand for LAFD services.

The adequacy of fire protection for a given area is based on response distance from existing fire stations, required fire flow, and the LAFD's judgment for needs in the area. Fire Station No. 92 is located 1.4 miles from the project site, which is within the recommended maximum response distance (1.5 miles), and has an estimated response time of 5.2 minutes to the project site. Therefore, construction of additional stations in closer proximity to the project site would not be required. With regard to fire flow, while the existing fire flow to the project site is approximately 9,000 gpm, LAFD's Bureau of Fire Prevention and Public Safety has suggested a potential need for fire flow to the proposed project at 12,000 gpm. With implementation of Mitigation Measure I.1-1, potential impacts related to fire flow would be reduced to a less than significant level.

Project-related increases in traffic on surrounding roadways could have an impact on fire protection and emergency medical services if the response capabilities of the LAFD are impeded. However, given the proximity of Fire Station No. 92 (1.4 miles) and the other two supporting stations to the site, and the number of major roadways serving the project site, emergency response to the project site is not expected to fall below acceptable levels (generally 5 minutes). In addition, project-related traffic is not anticipated to impair the LAFD from responding to service requests at the project site. Finally, the project would provide access for emergency

vehicles to the project site subject to the approval of the LAFD. With implementation of Mitigation Measures I.1-2 through I.1-5, the proposed project's potential impacts relative to emergency access would be less than significant.

(b) Cumulative Impacts

Of the 108 related projects identified within the project vicinity, 15 are located within Fire Station No. 92's "first-in" district. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional fire protection and emergency medical services. Related projects could potentially generate 163 incidents per year, and in conjunction with the proposed project could generate 204 incidents per year. This represents a 7.5 percent increase in annual incidents. All related projects would comply with the LAMC Fire Code and Building Code regulations related to fire safety, access, and fire flow. Furthermore, "second call" stations would help support Fire Station No. 92 in the event of an emergency at these sites. Therefore, cumulative impacts on existing fire protection and emergency medical services would be less than significant.

(c) Mitigation Measures

Implementation of the following mitigation measures would ensure that impacts related to fire safety are less than significant.

Mitigation Measure I.1-1: The Applicant shall provide payment of fees to LADWP for the construction of a 12-inch waterline within Constellation Boulevard along the project site frontage between Avenue of the Stars and Century Park West in order to allow for 12,000 gpm water flow to the project site, when connected to the water flow regulator station to be constructed by LADWP at or near the intersection of Century Park East and Olympic Boulevard. The new water line shall be in place prior to the occupancy of the residential component of the proposed project. The design of the water line shall be subject to the approval of the Fire Department and LADWP.

Mitigation Measure I.1-2: Project building plans including a plot plan shall be submitted for approval by the Los Angeles Fire Department prior to the issuance of a building permit. The plot plan shall include the following minimum design features: location and grade of access roads and fire lanes, roadway widths, distance of buildings from an edge of a roadway of an improved street, access road, or designated fire lane, turning areas, and fire hydrants.

Mitigation Measure I.1-3: Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention

and suppression features and other life-saving equipment (e.g. defibrillators) appropriate to the design of the project.

Mitigation Measure I.1-4: Where fire apparatus (e.g., trucks, equipment, etc.) 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.

Mitigation Measure I.1-5: 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.

(d) Level of Significance After Mitigation

In compliance with the LAMC, Fire Code, the Los Angeles General Plan, the General Plan Safety Element, and all other applicable ordinances and requirements, the proposed project would not result in any significant impacts on fire protection and emergency medical services. Implementation of the recommended mitigation measures would ensure that the project's impacts on the delivery of fire protection and emergency medical services to the project site are less than significant. Thus, no significant unavoidable impacts are anticipated.

(2) Police Protection

(a) Environmental Impacts

Due to construction-related traffic and potential temporary lane closures, project construction activities could increase response times for emergency vehicles traveling to local businesses on Santa Monica Boulevard, Avenue of the Stars, Century Park West, and Constellation Boulevard. However, the proposed project would require implementation of a Construction Staging and Traffic Management Plan, which would reduce traffic impacts associated with construction activity to a less than significant level. Therefore, construction-related traffic impacts on emergency access would also be less than significant. In addition, during construction, equipment and building materials could be temporarily stored on-site, which could result in theft. This could potentially necessitate police involvement unless adequate safety and security measures are implemented to secure the site. Mitigation has been developed to reduce this potentially significant impact during construction to a less than significant level.

Relative to project operations, the proposed residential and commercial uses could potentially generate 24 crimes/calls per year, which is less than a 0.01 percent increase in potential crimes/calls in the area. Furthermore, the project-related increase in population from 221,876 residents to 222,429 residents in the West Los Angeles area would alter the officer to

resident ratio from one officer per 948 residents to one officer per 951 residents, which is nominal. The project would provide adequate security features on the project site, such as additional levels of security around the commercial facilities, including foot patrol, bike patrol, and golf cart patrol; on-site residential security; implementation of additional computer-assisted security programs consisting of Tour Trax, CASE Global, and EpiCS; and security lighting in areas including but not limited to parking structures, pathways, and curbside queuing areas. Closed-circuit television would also be installed in locations including but not limited to all exit points, play areas, family rest areas, food courts, loading docks, and parking areas. Therefore, the proposed project would not result in a demand for additional police protection services that would exceed the capability of the Los Angeles Police Department (LAPD) to serve the project site. Potential impacts affecting the capability of existing police protection services would be less than significant.

(b) Cumulative Impacts

Of the 108 related projects located in the project vicinity, 63 are located within the West Los Angeles Community Police Station service area. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional police protection services. The related projects could potentially generate an estimated 638 additional crimes/calls per year. The proposed project in conjunction with related projects could therefore generate 662 additional crimes/calls per year. This represents a 10.5 percent increase in annual crimes/calls. However, all related projects would be reviewed by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Therefore, cumulative impacts to the existing police protection services would be less than significant.

(c) Mitigation Measures

Construction activities may cause impacts that would affect police service to the project site. Mitigation Measures I.2-1 through I.2-3 would reduce impacts due to construction activities to a less than significant level. Project operation would not result in any impacts that would significantly affect the capacity of the LAPD to serve the project. Although no significant impacts have been identified for project operations, Mitigation Measures I.2-4 through I.2-6 are recommended to ensure that specific design features would be implemented.

Mitigation Measure I.2-1: During project construction, the Applicant shall develop and implement an Emergency Procedures Plan, including notification to the LAPD of any lane closures or other road construction.

Mitigation Measure I.2-2: During project construction, the Applicant shall ensure adequate emergency access to adjacent uses.

Mitigation Measure I.2-3: During project construction, the Applicant shall implement security measures including security fencing, lighting, and the use of a seven-day, 24-hour security patrol.

Mitigation Measure I.2-4: The Applicant shall consult with the Los Angeles Police Department Crime Prevention Unit on crime prevention features appropriate for the design of the project.

Mitigation Measure I.2-5: Entryways, elevators, lobbies, and parking areas shall be well illuminated and designed to eliminate areas of concealment.

Mitigation Measure I.2-6: Upon project completion of each phase of the project, the Applicant shall provide the West Los Angeles Community Police Station Commanding Officer with a diagram of each portion of the property, including access routes and provide additional information that might facilitate police response.

(d) Level of Significance After Mitigation

The project would not result in significant impacts to police protection services with the implementation of project safety design features and the recommended mitigation measures.

(3) Schools

(a) Environmental Impacts

The proposed project would generate a total of 44 elementary school students, 24 middle school students, and 21 high school students. All school facilities serving the project site would be operating well below capacity for the 2011-2012 school year with the exception of Westwood Charter Elementary School. Westwood Charter Elementary School would result in a shortage of 166 seats (122+44). Due to the existing demographics of the area in which the project site is located and the anticipated demographics of the future residents of the project, the project's student generation forecast may be overstating the actual student generation and therefore, the analysis presents a conservative analysis of the project's potential impacts on Los Angeles Unified School District (LAUSD) facilities. Furthermore, the project's impacts on LAUSD school facilities (i.e., Westwood Charter Elementary School) would be reduced to a less than significant level with the payment of developer impact fees in accordance with SB 50 and pursuant to Section 65995 of the California Government Code.

Project-related construction traffic and activities including worker travel, hauling activities, and the delivery of construction materials would not affect existing school traffic, pedestrian routes, or transportation safety in the project vicinity as there are no schools adjacent to the project site. The proposed haul routes for construction related transport would occur via

major arterials in the project vicinity and would not pass in front of any schools. In addition, based upon the LAUSD Pedestrian Route Maps provided by the City of Los Angeles Department of Transportation, haul routes would not interfere with school pedestrian routes at Westwood Charter Elementary, Emerson Middle School, or Webster Middle School.¹¹ Safety and security would be maintained throughout project construction, as construction activities would adhere to all applicable standard construction standards including the California Vehicle Code. Project-related construction would not alter existing traffic patterns or result in any significant traffic impacts. Therefore, school bus routes and pedestrian routes would not be negatively affected.

(b) Cumulative Impacts

Of the 108 related projects identified within the project vicinity, 50 are located within the attendance boundaries of the schools serving the project site. The proposed project in conjunction with related projects could therefore generate 197 elementary school students, 189 middle school students, and 176 high school students. All school facilities would be able to accommodate these new students with the exception of Westwood Charter Elementary School. Westwood Charter Elementary School would result in a shortage of 319 seats. As previously discussed, pursuant to Government Code Section 65995, the payment of the developer fees under the provisions of SB 50 would constitute as full mitigation for all impacts to school facilities. Therefore, cumulative impacts to LAUSD schools serving the project site would be less than significant.

(c) Mitigation Measures

Although the proposed project would generate 44 elementary schools students which would result in potentially significant impacts to Westwood Charter Elementary School given its projected capacity, pursuant to Government Code Section 65995 and in compliance with SB 50 (payment of developer fees) all project-related impacts would be reduce to a less than significant level. Therefore, no other mitigation measures are required.

(d) Level of Significance After Mitigation

Compliance with SB 50 (payment of developer fees) would reduce all project-related impacts to a less than significant level.

¹¹ City of Los Angeles- Department of Transportation. <http://www.lacity.org/ladot/RoutesToSchool.htm>, accessed February 1, 2007.

(4) Libraries

(a) Environmental Impacts

Assuming that in year 2012 project residents would utilize the Westwood Branch Library as it is the library located nearest the site, the expected number of residents served by the Westwood Branch Library in 2012 combined with the project's estimated population would be 77,693 people. Thus, the project's demand for library facilities would represent less than a one percent increase in the demand for library facilities at the Westwood Branch library. Therefore, the project would result in a nominal increase in the demand for library facilities at the Westwood Branch Library. The project's estimated population combined with the expected number of residents served by the Palms-Rancho Park Branch Library at buildout would be 76,108 people. This increased demand for library services at the Palms-Rancho Park Branch Library resulting from the project would also represent less than a one percent increase in the demand for library services. As identified by the City of Los Angeles Public Library (LAPL), both the Westwood Branch and Palms-Rancho Park Branch Libraries currently adequately meet the demand for library services within their respective communities. Thus, since the increased demand generated by the project would be nominal, impacts on these library facilities would be less than significant.

(b) Cumulative Impacts

The proposed project in conjunction with the related projects would generate a population of approximately 4,988 persons within the Westwood Branch Library service area. Added to the expected service population in 2012 of 77,140 persons in the Westwood community, the total service population for the Westwood Branch Library would be approximately 82,128 persons. There are nine related projects within the Palms-Rancho Park Branch Library service area. Three of the nine projects are residential uses, which would provide a total of 128 residential units and generate a population of approximately 262 persons. The proposed project in conjunction with the related projects would generate a total of 815 additional people within the Palms-Rancho Park Branch Library service area. Added to the expected 2012 service population of 75,555, the total service population for the Palms-Rancho Park Branch Library service area would be 76,370. However, these estimated numbers are significantly overstated as it does not consider that much of the growth associated with the project and related projects is already accounted for in the service population projections made by the LAPL. In addition, it would be expected that other projects would implement measures as necessary to ensure that their respective impacts on library facilities are less than significant. Therefore, it is concluded that cumulative impacts relative to Westwood Branch Library and Palms Rancho Park Branch Library would be less than significant.

(c) Mitigation Measures

The proposed project would not result in a significant impact to library services and facilities. No mitigation measures are necessary.

(d) Level of Significance After Mitigation

The proposed project would not result in a significant impact to library services and facilities. No mitigation measures are necessary.

(5) Parks and Recreation**(a) Public Recreation Plan**

Based on the estimated number of residents generated by the project (553 residents), the project would require 1.11 acres (0.002 acre per person) of neighborhood parkland to meet the City of Los Angeles Public Recreation Plan (PRP) long-range standard and 0.55 acre (0.001 acre per person) to meet the PRP's more attainable short- and intermediate-range standard. The project proposes to include 1.05 acres of open space and recreational opportunities thus exceeding the City's short- and intermediate-range standards for neighborhood parks by 0.5 acres and falling just 0.06 acres short of the City's long-range standards for neighborhood parks. While the PRP notes that the long-range standards may not be reached during the life of the plan, and, therefore, the short- and intermediate-range standards should be consulted for guidance, implementation of the mitigation measure below would ensure that through the provision of on-site recreational amenities and open space areas, payment of in-lieu fees, dedication of parkland, or a combination of these methods, the project would comply with the parks and recreational requirements set forth by State law.

(b) City of Los Angeles Municipal Code

The LAMC requires the project to provide 45,850 square feet of open space, of which 50 percent must be common open space. Of the 22,925 square feet of common open space area required for the project, a minimum of 5,731 square feet (25 percent) must be planted with ground cover, shrubs, or trees. The project would provide 46,000 square feet of common open space area via a rooftop terrace, of which 30,300 square feet would be planted area. Therefore, the proposed project would exceed the required 45,850 square feet of usable open space area, the required 22,925 square feet of common open space area, and the required 25 percent square feet of planted common area. Therefore, the proposed project would comply with the open space requirements set forth in LAMC Section 12.21.

While the project proposes to include 46,000 square feet of common open space (1.05 acres) on its exterior terrace, which would exceed the land area requirements of Section 17.12 of the LAMC by approximately 0.28 acres, this area would not be dedicated to the City of Los Angeles. Thus, potentially significant impacts could occur. However, implementation of the mitigation measure below would ensure that through the provision of on-site recreational amenities and open space areas as a credit against the dedication of open space, payment of in-lieu fees, dedication of parkland, or a combination of these methods, the project would comply with the maximum requirements established under the Quimby Act.

(c) Cumulative Impacts

Of the 108 related projects identified in the project vicinity, 35 are located within the City of Los Angeles that propose residential uses. These related projects and use would cumulatively generate, in conjunction with the proposed project, the need for additional parks and recreation facilities. The related projects could potentially generate 7,009 residents. The proposed project in conjunction with related projects could therefore generate 7,562 residents. However, all related projects with residential uses would be required to comply with the requirements of the Quimby Act, the PRP, and LAMC Sections 12.21 and 17.12. As such, potential cumulative impacts to parks and recreational facilities would be reduced to a less than significant level.

(d) Mitigation Measures

Mitigation Measure I.5-1: In consultation with the City of Los Angeles Department of Recreation and Parks, the Applicant shall do one or more of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees.

(e) Level of Significance After Mitigation

Potentially significant impacts to park and recreational facilities associated with the proposed project, based on the maximum requirements established under the Quimby Act and the PRP, would be reduced to a level that is less than significant via compliance with Mitigation Measure I.5-1.

j. Traffic and Circulation

(1) Construction Impacts

Construction of the proposed project would generate traffic from construction worker trips and construction truck trips (i.e., the arrival and departure of trucks for the removal of

debris generated by on-site demolition, excavation and grading activities, as well as the delivery of construction materials. The overlap of Phase A, Phase B, and Phase C of construction was evaluated to provide a worst-case analysis. Specifically, this period would generate the highest number of construction trips (construction worker trips and construction truck trips) when compared to any other combination of construction phases. Together, construction workers and construction trucks are anticipated to generate 1,220 trips per day (610 inbound, 610 outbound) during this peak construction phase for the proposed project.

The inbound construction worker trips are anticipated to occur outside of the A.M. peak hour. However, the outbound construction worker trips may occur during the P.M. peak hour. Thus, it was conservatively estimated that approximately 121 outbound construction worker trips may be generated during the P.M. peak hour (i.e., 25 percent). The construction workforce would likely be generated from all parts of the Los Angeles region and thereby was assumed to arrive and depart from all directions (i.e., each direction along the I-405 and I-10 Freeways and from the local areas). Based on a distribution of 20 percent to any one particular segment, an increase of no more than 24 vehicles is forecast at study intersections during the P.M. peak hour. In addition, the number of trips generated by construction activities is less than the number of trips generated by existing uses on-site. Furthermore, the City of Los Angeles would require the proposed project to devise and implement a Construction Staging and Traffic Management Plan in compliance with LAMC requirements. This Plan would identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of demolition and construction activities associated with the proposed project. Moreover, also in compliance with LAMC requirements, the City's Department of Public Works would review and be responsible for approval of the truck haul routes to be used during construction. Furthermore, while construction of the project may require temporary sidewalk closures, alternative sidewalk routes would be available, blockage or slowing of emergency vehicles would not be anticipated, and the Police Department would be notified of any traffic slowing or lane closures and traffic management personnel would be trained to assist emergency response vehicles. Thus, compliance with regulatory requirements would ensure that construction-related traffic and access impacts would be less than significant.

(2) Operational Impacts

(a) Intersections

The proposed project is forecast to generate a net increase of 5,922 trips during the weekday 24-hour period. During the weekday A.M. peak hour, the proposed project is expected to generate an overall net decrease of 177 trips (235 less inbound trips and 58 more outbound trips). During the weekday P.M. peak hour, the proposed project is expected to generate an overall net increase of 364 trips (290 more inbound trips and 74 more outbound trips).

The proposed project is forecast to generate a net increase of 7,466 trips during the weekend 24-hour period. During the weekend peak hour, the proposed project is expected to generate an overall net increase of 720 trips (367 more inbound trips and 353 more outbound trips).

In addition to the trip generation forecast for the proposed project, a forecast was made of likely pass-by trips that could be anticipated at the project site. Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from traffic passing the project site on an adjacent street or roadway that offers direct access to the site. In this instance, the adjacent roadways to the project site include Santa Monica Boulevard, Constellation Boulevard, Avenue of the Stars, and Century Park West. The pass-by traffic forecast was based on criteria set forth in LADOT's policy on pass-by trips. Pass-by adjustments were applied to the weekday 24-hour period forecasts, as well as the weekday A.M. and P.M. peak hour traffic volume forecasts for the Shopping Center and cinema land use components of the proposed project.

The Santa Monica Boulevard Transit Parkway Project borders the project site to the north and a transit area is situated immediately opposite the project site along the south side of Constellation Boulevard. Over 25 bus transit lines and routes are provided adjacent to or in close proximity to the project site, with 12 of these transit lines and routes directly serving the site along one or more of the project frontages. A total of seven different public bus transit service providers operate in the immediate vicinity of the project site. Accordingly, a trip reduction adjustment was employed in the project trip generation forecast to account for the type of land uses planned for the project and the proximity to the transit area which offers a high level of bus transit opportunities in the Century City area. Based on data provided in the 2004 Los Angeles County CMP, a trip reduction factor of 15 percent was utilized to account for the project's proximity to these transit facilities and public bus transit routes in the area. This reflects similar approaches and trends as those for commercial developments around transit centers and residential mixed-use developments around transit centers. Based on discussions with LADOT and review of the significant number of transit providers, transit routes, transit headways, as well as the integration of the Rapid Bus along the nearly completed Santa Monica Boulevard Transit Parkway, this adjustment was incorporated into the project trip generation forecasts.

The adjusted project traffic volumes with the project were then added to the future weekday traffic conditions. Using the City of Los Angeles' significance thresholds criteria, the proposed project would not create a significant impact at any of the 55 study intersections during the weekday A.M. peak hour. However, at full buildout, the proposed project would create a significant impact at four of the 55 study intersections during the weekday P.M. peak hour and two of the study intersections during the weekend peak hours (listed below). Using the City of Beverly Hills' significance thresholds criteria, the proposed project would not create a significant

impact at any of the eight study intersections located in the City of Beverly Hills during the weekday A.M., weekday P.M., or weekend peak hours.

Impacted Intersections During Weekday P.M. Peak Hour (CMA)

- No. 12: Westwood Boulevard/Olympic Boulevard
- No. 14: Overland Avenue/Santa Monica Boulevard
- No. 31: Century Park West/Santa Monica Boulevard
- No. 34: Westfield Shopping Center Driveway/Santa Monica Boulevard

Impacted Intersections During Weekend Peak Hour (CMA)

- No. 11: Westwood Boulevard/Santa Monica Boulevard
- No. 16: Overland Avenue/Pico Boulevard

While the traffic analysis study area was determined to be adequate by the Lead Agency, specific requests for analysis of additional locations were received as part of the Draft EIR NOP process, which resulted in an expansion from 44 study intersections to 55 study intersections and eight study street segments. As part of the Final EIR, four locations were requested for analysis by the City of Beverly Hills (Moreno Drive and South Santa Monica Boulevard; Moreno Drive and North Santa Monica Boulevard; Whittier Drive and Merv Griffin Way; and Santa Monica Boulevard and Doheny Drive) during the Draft EIR comment period and have been included as part of the Final EIR. As indicated in Appendix A2 (see Appendix Tables A2-A and A2-B of the Final EIR), no significant impacts are expected at any of the four locations employing either the more strict City of Los Angeles significant impact threshold criteria or the City of Beverly Hills criteria, respectively. In addition, four additional intersections were added as part of the Final EIR based on comments received from the Beverlywood Homes HOA. As indicated in Appendix A4 (see Appendix Table A4 of the Final EIR), no significant impacts are expected at any of the four locations employing the City of Los Angeles significant impact threshold criteria.

As discussed in detail in the Traffic Study, no significant intersection impacts would occur until development of Phase E (comprised of 106,523 square feet of office uses and 19,000 square feet of retail uses) occurs and all other uses proposed by the project have been developed.

Optional Site Access Scheme

The optional site access scheme for Avenue of the Stars was also analyzed as part of the Traffic Impact Study. Although the driveways would remain in the same location under the optional access scheme, for the residential component, full ingress and partial egress (right-turn only) turning movements would be accommodated via the northerly Avenue of the Stars driveway. Additionally, for the commercial component (i.e., retail and office patrons), only egress turning movements would be allowed at the southerly Avenue of the Stars driveway. As with the proposed project access scheme, future project residents would be provided a circulation pattern that would not impede or conflict with commercial motorists.

Using the optional site access scheme, all 55 study intersections were analyzed for future with project weekday A.M., weekday P.M., and weekend peak hour traffic conditions. Using the City of Los Angeles' significance thresholds criteria, the optional site access scheme would create a significant impact at the same six study intersections as the proposed project. Therefore, the optional site access scheme would result in similar impacts as the proposed project and would be subject to same mitigation measures. Using the City of Beverly Hills' significance thresholds criteria, the optional site access scheme would not create a significant impact at any of the eight study intersections located in the City of Beverly Hills during the weekday A.M., weekday P.M., or weekend peak hours.

(b) Project Access

The intersection of Westfield Shopping Center Driveway and Santa Monica Boulevard (Study Intersection No. 34) provides primary access to the project site. This intersection is projected to operate at LOS C, LOS F, and LOS A, during the weekday A.M., weekday P.M., and weekend peak hours, respectively, under future 2012 with project conditions. Using the City of Los Angeles' significance thresholds criteria for project access, the proposed project would create a significant impact at this intersection during the weekday P.M. peak hour.

Under the optional site access scheme, the intersection of Westfield Shopping Center Driveway and Santa Monica Boulevard (Study Intersection No. 34) would also provide primary access to the project site. Therefore, the optional site access scheme would result in similar impacts as the proposed project with regard to project access and would be subject to the same mitigation measure.

(c) Neighborhood Street Segments

Weekday and weekend trips generated by the proposed project would incrementally increase average daily traffic (ADT) volumes on each of the eight neighborhood street segments. However, using the City's significance thresholds criteria, the proposed project would not create

a significant impact at any of the eight neighborhood street segments during the weekday or weekend. Therefore, impacts to neighborhood street segments would be less than significant. No mitigation measures are required.

During the NOP comment period for the Draft EIR, detailed comments were received from the Westwood Charter Elementary School, which is located at 2050 Selby Avenue. Concerns were raised regarding the existing and future traffic levels along the portion of Overland Avenue between La Grange Avenue and Mississippi Avenue (Neighborhood Street Segment No. 1). Neighborhood Street Segment No. 1 was analyzed specifically to address these comments. Using the City's significance thresholds criteria, the forecast weekday and weekend ADT volume increases along this neighborhood street segment (2.5 percent increase during the weekday and 2.2 percent increase during the weekend) are well below the City's significance threshold (an increase of 8 percent or more would constitute a significant impact along this neighborhood street segment based on existing and forecast future weekday and weekend ADT volumes). Therefore, as previously noted, no mitigation measures (i.e., additional travel lanes along this portion of Overland Avenue) are required or recommended.

Additionally, comments were expressed during the NOP comment period for the Draft EIR with respect to the existing traffic volumes along the Motor Avenue corridor (Neighborhood Street Segment Nos. 7 and 8). One segment of Motor Avenue currently carries over 17,000 vehicles per day during a typical weekday (Neighborhood Street Segment No. 7). Recently, one of the Neighborhood Traffic Mitigation Plans approved and implemented by the City of Los Angeles for the Motor Avenue corridor included measures aimed at reducing through traffic volumes along the corridor (i.e., street bulb-outs, changes to traffic signal timing, etc). Furthermore, it is important to note that the existing office buildings located at the project site (1930 Century Park West and 1801 Avenue of the Stars) currently generate traffic volumes along the Motor Avenue corridor during a typical weekday. Because the proposed project would remove these office buildings, a slight decrease in ADT volumes along Motor Avenue is forecast during the weekday upon completion of the proposed project. Therefore, as previously noted, based on the City's significance threshold criteria, no significant impact would occur during the weekday. In addition, no significant impact would occur during the weekend. No mitigation measures are required or recommended.

(d) Freeway Segments

The maximum increase in freeway traffic attributed to the proposed project during the weekday A.M. peak hour is estimated to be five vehicles on a portion of I-405 Freeway. During the weekday P.M. peak hour, the maximum increase in freeway traffic attributed to the proposed project is estimated to be 11 vehicles on a portion of I-405 Freeway. During the weekend peak hour, the maximum increase in freeway traffic attributed to the proposed project is estimated to be 14 vehicles on a portion of I-405 Freeway. These maximum increases in overall freeway

traffic volumes correspond to a D/C ratio increase of 0.001 or less. Accordingly, using Metro's and the City's significance thresholds criteria, the proposed project would not create a significant impact at any of the three freeway segments during the weekday A.M., weekday P.M., or weekend peak hours. Therefore, impacts to freeway segments would be less than significant. No mitigation measures are required.

(e) Congestion Management Program

(i) Intersections

The proposed project is expected to exceed the CMP threshold of 50 trips at one intersection during the weekday P.M. peak hour (Santa Monica Boulevard and Westwood Boulevard [CMP Station Int. No. 62]). Therefore, a TIA is required at this intersection. Although Metro's 2004 CMP for Los Angeles County does not specifically identify weekend criteria, the proposed project is expected to exceed the CMP threshold of 50 trips at two intersections during the weekend peak hours (Santa Monica Boulevard and Wilshire Boulevard [CMP Station Int. No. 5] and Santa Monica Boulevard and Westwood Boulevard [CMP Station Int. No. 62]). Therefore, a TIA was assumed to be required at these two intersections during the weekend peak hours.

The intersection of Santa Monica Boulevard and Wilshire Boulevard and the intersection of Santa Monica Boulevard and Westwood Boulevard are two of the 55 study intersections analyzed in the Traffic Impact Study. The proposed project is not expected to create a significant impact at the intersection of Santa Monica Boulevard and Wilshire Boulevard during the weekend peak hour. However, the proposed project is expected to create a significant impact at the intersection of Santa Monica Boulevard and Westwood Boulevard during the weekend peak hour. Mitigation to reduce the potential impact to this intersection would be required.

(ii) Freeways

According to Metro's 2004 CMP for Los Angeles County, a TIA must be conducted at all CMP freeway monitoring locations where a project would add 150 or more trips in either direction during the A.M. or P.M. weekday peak hours. All three CMP freeway monitoring locations have been analyzed, and the proposed project is not expected to exceed the CMP threshold of 150 trips at any of the freeway segments during the weekday A.M. or P.M. peak hours. The maximum increase in freeway traffic attributed to the proposed project is 11 vehicles during the weekday P.M. peak hour. Although a Traffic Impact Assessment (TIA) is not required for any of the CMP freeway monitoring locations, the proposed project is not expected to create a significant impact at any of the CMP freeway monitoring locations during the A.M. or P.M. weekday peak hours.

In addition, the maximum increase in freeway traffic attributed to the proposed project is 14 vehicles during the weekend peak hours. Thus, the proposed project is not expected to create a significant impact at any of the CMP monitoring locations during the weekend peak hours.

(iii) Public Transit Service

The number of public transit trips anticipated to be generated by the proposed project during the weekday was calculated using the methodology outlined in Metro's 2004 CMP for Los Angeles County. According to Metro's CMP, person trips equal 1.4 times vehicle trips and public transit trips equal 15 percent of the total person trips. The proposed project is estimated to generate 5,922 more vehicle trips over a 24-hour weekday, 177 less vehicle trips during the weekday A.M. peak hour, and 364 more vehicle trips during the weekday P.M. peak hour. However, these net new traffic volumes had reflected the transit reduction, therefore for purpose of this analysis these volumes were included in this calculation. Based on these numbers, the proposed project is forecast to generate demand for 1,926 more public transit trips over a 24-hour weekday (963 inbound trips and 963 outbound trips), 46 less public transit trips during the weekday A.M. peak hour (61 fewer inbound trips and 15 outbound trips), and 122 more public transit trips during the weekday P.M. peak hour (97 inbound trips and 25 outbound trips). Given the large number of bus transit lines and routes provided adjacent or in close proximity to the project, and given the relatively low number of public transit trips generated by the proposed project, it is anticipated that the existing public transit service within the project area would adequately accommodate these additional transit trips. Therefore, impacts on existing or future transit services in the project area would be less than significant. No mitigation measures are required.

(f) Parking

Based on the number of parking spaces required for the existing Shopping Center as well as the net new floor area and residential units proposed, the project would be required to provide 4,990 parking spaces. The project proposes to provide a total of approximately 4,529 parking spaces (655 for residential uses and 3,874 for commercial uses) which represents 461 parking spaces less than what is required. However, a shared parking analysis prepared for the proposed project demonstrates that the actual parking demand for the project would be substantially less throughout most of the year than what would otherwise be required by the parking rates.

The shared parking analysis was conducted for weekday and weekend conditions for the months of February and December following build-out of the proposed project. These two months were chosen because they are representative of the non-holiday and holiday shopping periods and would thus be indicative of the non-peak and peak parking demand for the project.

The forecast peak demand for parking at the project site for a February weekday condition is expected to occur at 1:00 P.M. when approximately 2,971 parking spaces are expected to be utilized. The forecast peak demand for parking for a February weekend condition is expected to occur at 2:00 P.M. when approximately 2,811 parking spaces are expected to be utilized. A surplus of 903 parking spaces is estimated during the weekday peak hour of parking demand (1:00 P.M.), while a surplus of 1,063 parking spaces is forecast during the weekend peak hour of parking demand (2:00 P.M.). Therefore, it is concluded that the 3,874 parking spaces proposed for the retail, restaurant, and office uses is more than adequate to accommodate the peak parking demand at the project site during non-holiday shopping periods.

For a December weekday condition, the forecast peak demand is expected to occur at 2:00 P.M. when approximately 4,400 parking spaces are expected to be utilized. For a December weekend condition, the forecast peak demand is also expected to occur at 2:00 P.M. when approximately 4,423 parking spaces are expected to be utilized. A deficiency of parking is forecast at the project site during weekday and weekend conditions for the holiday shopping period. Specifically, a deficit of 526 parking spaces is estimated during the weekday peak hour of parking demand (2:00 P.M.), while a deficit of 549 parking spaces is forecast during the weekend peak hour of parking demand (2:00 P.M.). Therefore, a significant impact would occur during the holiday shopping period. However, with the continued practice of securing off-site parking spaces in close proximity to the project, adequate parking would be available and would reduce this impact to a less than significant level. This continued practice of securing off-site parking has been made a mitigation measure for the project.

(g) Neighborhood Parking Intrusion

In response to comments made by representatives of the Tract 7260 Homeowners Association during the NOP for the Draft EIR regarding parking intrusion by employees and patrons of the existing Westfield Century City Shopping Center within their neighborhood, neighborhood parking intrusion surveys were conducted to assess if, and to what extent, parking intrusion by Shopping Center employees and patrons was occurring on street segments near Santa Monica Boulevard (i.e., those segments that were determined to have the greatest likelihood of intrusion due to proximity to the existing Shopping Center).¹² The results of the neighborhood parking intrusion surveys demonstrate that a nominal amount of mall-related parking intrusion (seven or fewer vehicles for any one time period) is occurring within the segments that were studied. Nevertheless, based on the results of the neighborhood parking intrusion surveys and on-going discussions with members of the community, the Applicant has begun to implement additional measures with the goal of deterring existing Shopping Center employees from parking within adjacent neighborhoods. Mitigation measures have been provided to reduce potential impacts from neighborhood parking intrusion.

¹² *It is important to note that the six survey stations were not determined to be all inclusive.*

(h) Parking Structure Queuing Analysis

Two inbound and two outbound lanes for the proposed parking structure would be located at each driveway. The inbound lanes would be controlled via a ticket dispenser, card reader, and gate, while the outbound lanes would be controlled via a cashier booth, ticket/card reader, and gate. Vehicle stacking distance for inbound lanes ranges from 80 to 170 feet. The inbound P.M. peak hour traffic volumes range from 313 to 655 vehicles per hour. For vehicle entering maneuvers with ticket dispensers and gates, a capacity service rate of 515 vehicles per lane (assuming an average of easy and sharp approach service rates) was employed for queuing analysis purposes. Based on the proposed driveway lane configurations, the projected inbound P.M. peak hour traffic volumes, and utilization of the reservoir needs versus traffic intensity chart referenced in LADOT's 2001 Manual of Policies and Procedures regarding driveway design, a calculation was made to determine the amount of vehicle storage required for the Century Park West driveway which has the shortest vehicle queuing area at the project site. The vehicle queue for the Century Park West driveway was calculated at a 95 percent confidence level (i.e., the design criteria utilized the curve that provides the amount of vehicular storage which could be exceeded no more than five times in 100 instances). A traffic intensity of 0.64 was calculated for the Century Park West driveway for both the weekday P.M. peak hour and weekend peak hour which corresponds to a necessary reservoir of three vehicles (i.e., approximately 60 feet in length) behind the service position. Therefore, adequate vehicle queuing storage area would be provided to accommodate the anticipated demand. Additionally, vehicle queuing within the City's right-of-way is not anticipated to occur. Furthermore, because the remaining project driveways (i.e., Santa Monica Boulevard, Constellation Boulevard, and Avenue of the Stars) would provide longer queuing storage areas and accommodate similar or lower per lane traffic volumes, it can be concluded that no on-street vehicle queuing during peak hours would occur. Therefore, impacts due to vehicle queuing would be less than significant. No mitigation measures are required.

(i) Consistency with Regulatory Framework

The project would be consistent with the requirements related to intersection, freeway and transit impacts within the CMP. The project would also be consistent with the CCNSP requirements, including those that relate to trip cap provisions for the area. In addition, the project would also implement the relevant requirements of the West LA TIMP.

The project would also be consistent with the relevant transportation-related policies set forth in the West Los Angeles Community Plan. Mitigation measures to be implemented as part of the project include a comprehensive TDM Plan that would provide increased opportunities for the use of transit services, encourage use of transit by project employees, encourage ridesharing by project employees, encourage pedestrian activity, and provide facilities that would encourage the use of bicycles. Thus, the project would support the Community Plan goals, policies, and objectives associated with alternatives to the use of the automobile and the associated reduction

in traffic congestion. In addition, the proposed project itself would provide housing within a mature employment hub and thus help to reduce vehicle trips. The project also includes measures to discourage spillover parking on neighborhood streets, consistent with the Community Plan.

(3) Cumulative Impacts

(a) Construction

The construction of 108 related projects is anticipated in the project study area. These 108 related projects are dispersed throughout the study area and draw upon a workforce from all parts of the Los Angeles region. In general, the majority of the construction workers are anticipated to arrive and depart the individual construction sites during off-peak hours (i.e., arrive prior to 7:00 A.M. and depart between 3:00 to 4:00 P.M.) thereby avoiding generating trips during the A.M. and P.M. peak traffic periods. In addition, the haul truck routes for the related projects would be approved by the LADOT according to the location of the individual construction site and the ultimate destination. LADOT's established review process would take into consideration overlapping construction projects and would balance haul routes to minimize the impacts of cumulative hauling on any particular roadway. Although the proposed project would result in less than significant construction traffic impacts due to worker trips and haul trips, cumulative impacts are concluded to be significant and unavoidable due to the potential for concurrent construction of the related projects in the vicinity of the project site in conjunction with the project itself.

(b) Emergency Access and Pedestrian Access

While the majority of the related projects are of substantial distance from the project site, there are several related projects in the vicinity including the 10131 Constellation Boulevard project, the ABC Entertainment Center project, the 2055 Avenue of the Stars project, and several projects along Santa Monica Boulevard in the City of Beverly Hills. The ABC Entertainment Center project is nearly complete and thus would not result in any cumulative emergency access impacts. In addition, the 2055 Avenue of the Stars project is underway and it is expected that the majority of the construction of this project would be completed prior to construction of the New Century Plan. The project at 10131 Constellation was recently approved by the City of Los Angeles. While it is expected that construction of this project would commence before the proposed project, concurrent construction activities have the potential to occur. In addition, construction of the nearby projects to the east along Santa Monica Boulevard may also occur at the same time as the proposed project. It is anticipated that construction activities attributable to these related projects, in conjunction with the proposed project, would not cause a sufficient disruption to roadway capacity so as to result in a limitation to emergency access. As such, no cumulative impacts associated with the impediment of emergency vehicles due to construction

activities on the streets adjacent to the project site would occur. Related projects would also be required by the LADOT to incorporate traffic control and access measures, with the intent of preserving through access on streets adjoining construction sites. Therefore, cumulative impacts relative to emergency access on the local and regional street network, due to construction activities, are concluded to be less than significant.

While there are several related projects that are located in close proximity to the project site, such projects are located a sufficient distance from the project site that a cumulative pedestrian and vehicle access impact during construction would not occur. For example, none of the related projects is located within the same block as the proposed project. As such, related projects would not cause a cumulative impact relative to pedestrian and vehicle access on the streets and sidewalks adjacent to the project site.

(c) Operation

The traffic models utilized in the analysis incorporated forecasted traffic increases due to ambient growth and related projects through the year 2012 (the build-out year of the proposed project). Furthermore, the CMP analysis evaluates traffic impacts on a larger, regional scale. Therefore, cumulative impacts on intersections, neighborhood street segments, freeway segments, and the regional transportation system as a result of the proposed project have been analyzed.

By comparing the Future with project conditions to the existing conditions, increases in system-wide traffic volumes in the project vicinity are anticipated. It is anticipated that the individual related projects would be required to reduce potentially significant traffic impacts to the extent feasible. However, as no such guarantee exists in order to ensure that every project implements the required mitigation measures, it is conservatively concluded that cumulative development would yield a significant cumulative impact on intersection operations.

Impacts pertaining to project access and parking structure queuing are site-specific impacts. In addition, the project would not result in access or queuing impacts with implementation of the mitigation measures provided below. Thus, impacts associated with access and queuing would not be cumulatively considerable.

With regard to parking, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the project vicinity. Therefore, cumulative impacts related to parking would be less than significant.

With regard to public transit, similar to the proposed project, the related projects would generate an overall increase in transit riders. This effect is a positive impact and is consistent with City land use and transportation policies to reduce traffic. City and regional transportation policies also facilitate the ongoing expansion of the regional transit system and the Santa Monica

and Wilshire transit corridors are planned to be expanded as growth occurs. Thus, the increased transit ridership associated with the project and related projects, is not expected to exceed the capacity of transit systems. Thus, cumulative impacts would be less than significant.

(4) Mitigation Measures

(a) Construction

With implementation of the project design features, as well as compliance with regulatory requirements, construction-related traffic impacts would be less than significant. However, the following mitigation measures are recommended to ensure impacts remain less than significant.

Mitigation Measure J-1: Prior to the start of construction, the Applicant shall devise a Construction Staging and Traffic Management Plan to be implemented during construction of the proposed project. The Construction Staging and Traffic Management Plan shall identify all traffic control measures, signs, and delineators to be implemented by the construction contractor through the duration of demolition and construction activities associated with the proposed project. The Construction Staging and Traffic Management Plan shall be subject to final approval by LADOT. Provisions within the Construction Staging and Traffic Management plan may include but would not be limited to: maintaining access for land uses in the proximity of the project site; scheduling of deliveries and pick-ups of construction materials for non-peak travel periods, to the maximum extent feasible; coordination of haul trucks, deliveries and pick-ups to reduce the potential for trucks waiting to load or unload for protracted periods of time; minimization of obstruction of through-traffic; use of flag persons to assist trucks in and out of the project area; prohibition of parking for construction workers except on the project site and any designated off-site parking locations; and establishment of a construction liaison and a construction hotline number.

Mitigation Measure J-2: Prior to the start of construction, the Applicant shall submit the truck haul routes to be used during project construction to the City's Department of Building and Safety for their review and approval.

(b) Operation

(i) Intersections

No significant intersection impacts would occur until development of Phase E (comprised of 106,523 square feet of office uses and 19,000 square feet of retail uses) and all other uses proposed by the project are developed. Full buildout of the proposed project would result in a

significant impact at four of the 55 study intersections during the weekday P.M. peak hour and two of the study intersections during the weekend peak hours. With the Santa Monica Boulevard Transit Parkway Project, as well as the City of Los Angeles' upgrades to the area wide intersections with the Automated Traffic Surveillance and Control System (ATSAC) and Adaptive Traffic Control System (ATCS), physical mitigation measure opportunities are quite limited. Physical mitigation measures are only recommended for two study intersections (Century Park West/Santa Monica Boulevard and Westfield Shopping Center Driveway/Santa Monica Boulevard). A Transportation Demand Management Plan (TDM) is recommended for the remaining four study intersections (Westwood Boulevard/Olympic Boulevard, Overland Avenue/Santa Monica Boulevard, Westwood Boulevard/Santa Monica Boulevard, and Overland Avenue/Pico Boulevard). Generally, a TDM Plan identifies opportunities to reduce parking demand and vehicle dependency, as well as promote alternative travel modes. Furthermore, because the project site is located in West Los Angeles, the TDM Plan must comply with the West Los Angeles Transportation Improvement and Mitigation Specific Plan. While a trip reduction resulting from the TDM measure referenced above is expected to reduce the forecasted significant impacts to less than significant levels, it is recognized that this may be difficult to attain solely based upon on-site TDM measures. It is expected that attainment of the required level of trip reduction may likely require off-site TDM measures as well. Thus, in order to provide a conservative analysis, it has been assumed that the required level of trip reduction will not be attained and that significant and unavoidable traffic impacts may occur. These significant impacts would not occur until development of Phase E (comprised of 106,523 square feet of office uses and 19,000 square feet of retail uses) occurs and all other uses proposed by the project have already been developed.

Mitigation Measure J-3: For the intersection of Century Park West and Santa Monica Boulevard (Study Intersection No. 31), a modification to the existing traffic signal, roadway restriping, and possibly roadway widening in order to accommodate dual northbound left-turn lanes and dual right-turn lanes at the northbound approach shall be implemented. The south leg of the intersection currently provides three southbound departure lanes and three northbound approach lanes. The proposed mitigation can be accommodated via one of two options:

- 1) If the southbound departure is reduced from three lanes to two lanes, the added northbound approach lane can be accommodated with a traffic signal modification, roadway restriping and possibly some roadway widening; **or**
- 2) If the southbound departure is maintained at three lanes, the added northbound approach lane can be accommodated with roadway widening along both the east and west sides of Century Park West.

Mitigation Measure J-4: For the intersection of Westfield Shopping Center Driveway and Santa Monica Boulevard (Study Intersection No. 34), widening of the northbound approach from the project site at Santa Monica Boulevard to provide an additional exiting approach lane shall be implemented. The proposed configuration at the northbound approach shall consist of dual left-turn lanes and dual right-turn lanes. A traffic signal modification may be required to accommodate this improvement.

Mitigation Measure J-5: For the intersections of Westwood Boulevard and Olympic Boulevard (Study Intersection No. 12), Overland Avenue and Santa Monica Boulevard (Study Intersection No. 14), Westwood Boulevard and Santa Monica Boulevard (Study Intersection No. 11), and Overland Avenue and Pico Boulevard (Study Intersection No. 16), a comprehensive Transportation Demand Management Plan (TDM) shall be developed and implemented in conformance with the West Los Angeles Transportation Improvement and Mitigation Specific Plan. The TDM Plan shall include measures, such as those listed in the Traffic Impact Study prepared by Linscott, Law & Greenspan, Engineers (refer to Appendix F of the Draft EIR), to decrease the number of vehicular trips generated by people traveling to the project site by offering specific facilities, services, and actions designed to increase the use of alternative transportation modes (i.e., transit, rail, walking, bicycling, carpool, etc). The TDM Plan shall be developed in conjunction with LADOT and subject to their final approval.

(c) Project Access

The proposed project would create a significant impact at the project's primary access point (Westfield Shopping Center Driveway and Santa Monica Boulevard [Study Intersection No. 34]) during the weekday P.M. peak hour. Mitigation Measure J-4 above has been proposed to address potential impacts to this intersection. Therefore, no additional mitigation measures are required.

(d) Neighborhood Street Segments

The proposed project would not create a significant impact any of the eight neighborhood street segments during the weekday or weekend. Therefore, no mitigation measures are required.

(e) Freeway Segments

The proposed project would not create a significant impact at any of the three freeway segments during the weekday A.M., weekday P.M., or weekend peak hours. Therefore, no mitigation measures are required.

(f) Congestion Management Program**(i) Intersections**

The proposed project would create a significant impact at one of the six CMP intersection monitoring locations during the weekend peak hour (Santa Monica Boulevard and Westwood Boulevard [CMP Station Int. No. 62]). Mitigation Measure J-5 above has been proposed to address potential impacts to this intersection. Therefore, no additional mitigation measures are required.

(ii) Freeways

The proposed project would not create a significant impact at any of the CMP freeway monitoring locations during the weekday A.M., weekday P.M., or weekend peak hours. Therefore, no mitigation measures are required.

(g) Public Transit Service

The proposed project would not create a significant impact on existing or future public transit services in the vicinity of the project site. Therefore, no mitigation measures are required.

(h) Parking

Mitigation Measure J-6: During the holiday shopping season (i.e., the Thanksgiving holiday through January 2nd), up to 600 parking spaces shall be secured at the Century Park West parking structure and/or the MGM Tower parking structure, or at an off-site facility with determined parking availability which can be secured for the proposed project. Shopping center employees shall be directed to park at the off-site parking structures, as well as patrons as needed. An annual report demonstrating the effectiveness of this mitigation measure shall be provided to the Department of City Planning for a three year time-frame following buildout of the project.

Mitigation Measure J-7: The Applicant shall continue to implement a parking registration program for the site. As part of the employee parking registration information, the employee shall sign an acknowledgement that they will not park outside of designated structures and/or assigned areas within structures or other secured parking lots.

Mitigation Measure J-8: A Westfield Century City Shopping Center parking ombudsman shall be assigned to the project and shall be responsible for addressing any complaints regarding parking intrusion by Shopping Center employees. The telephone number of the parking ombudsman shall be

disseminated to the surrounding communities. If community members notice a Shopping Center employee parking in their neighborhood, they shall be able to notify the ombudsman of the intrusion. If it is determined through the employee parking registration information on file that the parker was attributable to the Shopping Center, a violation shall be issued to the employee. All violations shall be noted and any repeat violations shall be grounds for termination of employment.

Mitigation Measure J-9: An outreach program shall be implemented whereby all employee parking options and alternative transportation modes (e.g., carpool programs and public transportation options) are fully emphasized.

(5) Level of Significance After Mitigation

(a) Construction

With implementation of Mitigation Measures J-1 and J-2, construction-related traffic impacts would be less than significant. However, cumulative construction impacts would be significant.

(b) Operation

(i) Intersections

The six significant intersection impacts would not occur until development of Phase E (comprised of 106,523 square feet of office uses and 19,000 square feet of retail uses) occurs and all other uses proposed by the project have already been developed. Upon implementation of the physical mitigation measure recommended for the intersection of Century Park West and Santa Monica Boulevard (Study Intersection No. 31), as well as the TDM Plan, the V/C ratio would improve from 1.200 (LOS F) to 1.124 (LOS F) during the weekday P.M. peak hour. Thus, the significant impact at this intersection during the weekday P.M. peak hour would be reduced to a less than significant level. While this reduction in V/C ratio reflects TDM, it is not required to reduce the project's impact to less significant levels.

Upon implementation of the physical mitigation measure recommended for the intersection of Westfield Shopping Center Driveway and Santa Monica Boulevard (Study Intersection No. 34), as well as the TDM Plan, the V/C ratio would improve from 1.015 (LOS F) to 0.976 (LOS E) during the weekday P.M. peak hour. Thus, the significant impact at this intersection during the weekday P.M. peak hour would be reduced to a less than significant level. While this reduction in V/C ratio reflects TDM, it is not required to reduce the project's impact to less than significant levels.

Upon implementation of the TDM Plan, the V/C ratio at the intersection of Westwood Boulevard and Santa Monica Boulevard (Study Intersection No. 11) would improve from 0.901 (LOS E) to 0.895 (LOS D) during the weekend peak hour. Thus, the significant impact at this intersection during the weekend peak hour would be reduced to a less than significant level. If the required level of trip reduction is not attained, the impact would remain significant and unavoidable.

Upon implementation of the TDM Plan, the V/C ratio at the intersection of Westwood Boulevard and Olympic Boulevard (Study Intersection No. 12) would improve from 1.059 (LOS F) to 1.055 (LOS F) during the weekday P.M. peak hour. Thus, the significant impact at this intersection during the weekday P.M. peak hour would be reduced to a less than significant level. If the required level of trip reduction is not attained, the impact would remain significant and unavoidable.

Upon implementation of the TDM Plan, the V/C ratio at the intersection of Overland Avenue and Santa Monica Boulevard (Study Intersection No. 14) would improve from 1.269 (LOS F) to 1.265 (LOS F) during the weekday P.M. peak hour. Thus, the significant impact at this intersection during the weekday P.M. peak hour would be reduced to a less than significant level. If the required level of trip reduction is not attained, the impact would remain significant and unavoidable.

Upon implementation of the TDM Plan, the V/C ratio at the intersection of Overland Avenue and Pico Boulevard (Study Intersection No. 16) would improve from 1.044 (LOS F) to 1.041 (LOS F) during the weekend peak hour. Thus, the significant impact at this intersection during the weekend peak hour would be reduced to a less than significant level. If the required level of trip reduction is not attained, the impact would remain significant and unavoidable.

The measures contained in the TDM Plan are above and beyond those incorporated into the trip generation forecast to account for the proximity to the nearby transit corridors and opportunities. It is important to note that the TDM Plan is anticipated to result in an overall reduction of 178 vehicle trips during the weekday P.M. peak hour. The 178 vehicle trips comprise approximately six percent of the total commercial P.M. peak hour trip generation. Therefore, implementation of the TDM Plan would assist in improving V/C and LOS at various intersections beyond the four intersections that are anticipated to be impacted by the proposed project. However, as the exact level of trip reduction cannot be determined at this time, it has been concluded that significant and unavoidable traffic impacts may occur at a total of four intersections.

(ii) Project Access

As previously discussed, upon implementation of the physical mitigation measure recommended for the intersection of Westfield Shopping Center Driveway and Santa Monica Boulevard (Study Intersection No. 34), as well as the TDM Plan, the V/C ratio would improve from 1.015 (LOS F) to 0.976 (LOS E) during the weekday P.M. peak hour. Thus, the significant impact at this intersection during the weekday P.M. peak hour would be reduced to a less than significant level.

(iii) Congestion Management Program

As previously discussed, upon implementation of the TDM Plan, the V/C ratio at the intersection of Westwood Boulevard and Santa Monica Boulevard (Study Intersection No. 11) would improve from 0.901 (LOS E) to 0.895 (LOS D) during the weekend peak hour. Thus, the significant impact at this intersection during the weekend peak hour would be reduced to a less than significant level.

(iv) Parking

With the proposed on-site parking supply, as well as implementation of Mitigation Measure J-6 (the provision of off-site parking spaces during the holiday shopping season), the parking supply would be sufficient to accommodate the peak demand. Therefore, impacts to parking would be reduced to a less than significant level.

Upon implementation of Mitigation Measures J-7 through J-9, potential impacts from neighborhood parking intrusion would be reduced to a less than significant level.

k. Water Supply**(1) Construction**

A short-term demand for water would occur during construction associated with demolition, excavation, grading, and other construction-related activities on site. As the project would occur in phases over a four-year period, construction activities would occur intermittently and would be temporary in nature. Thus, the demand for water supplies for construction activities such as soil watering (i.e., for fugitive dust control), demolition and construction activities, clean up, masonry, painting, and other related activities would be temporary and would require minimal water. The demand for water is not anticipated to have adverse impacts on the available water supply or the existing water distribution system. Furthermore, the water demand generated by project construction activities would be offset by the reduction in water

consumption resulting from the demolition of existing uses. Overall, demolition and construction activities would require minimal water and would not be expected to have any adverse impact on available water supplies or the existing water distribution system. Therefore, impacts associated with short-term construction activities would be less than significant.

(2) Operation

Development of the proposed project would result in an increase in long-term water demand for operational uses, maintenance, and other activities on the project site. According to the Water Supply Assessment prepared by LADWP for the proposed project, the project water demand increase is estimated to be approximately 134 acre-feet (AF) annually based on review of information submitted by the City of Los Angeles Planning Department. LADWP's 2005 UWMP projects yearly water demand to reach 776,000 AF by 2030, or have an increase of 17 percent from 2005. The anticipated increase in water usage of 134 AF annually would fall within the available and projected water supplies for normal, single-dry, and multiple-dry years through the year 2030 water demand projections of LADWP's 2005 UWMP. Therefore, LADWP concludes that it would be able to meet the water demand of the project as well as existing and planned future water demands of its service area. In addition, while the precise amount of water that MWD will be able to supply to southern California in the near future is unclear given Judge Wanger's recent decision in *Natural Resources Defense Council, et al. v. Kempthorne, et al. (NRDC)*, the consequence of NRDC for the project's water supply should be minimal. LADWP receives only approximately 29 percent of its water supply from MWD and the remainder of LADWP water comes from local groundwater and Los Angeles Aqueducts. Moreover, as a result of several plans being initiated, MWD water supply may be restored to previous levels in the next few years. The Applicant will continue to coordinate with LADWP to ensure adequate water supply to the project. In addition, compliance with State laws regarding water conservation measures, including pertinent provisions of Title 20 and Title 24 of the California Code of Regulations would reduce the project water consumption estimates for the project at full build out, thereby reducing the demand on City supplies. As such, project impacts on water supply would be less than significant.

The water infrastructure serving the project site consists of domestic water mains located in the City streets surrounding the project site including 12-inch water mains in Santa Monica Boulevard, Avenue of the Stars, and Century Park West, and an 8-inch water main located in Constellation Boulevard. With regard to domestic water, these mains have adequate capacity to accommodate the water demand increase of 134 AF annually that would be generated by the proposed project. However, in order to provide adequate fire flow capacity to the project as requested by the Fire Department, water infrastructure improvements would be required. The Applicant has been coordinating with LADWP and LAFD during the development of the project plans in order to ensure that adequate water flow is provided.

With implementation of Mitigation Measure I.1-1 as described in Section IV.I.1, Public Services – Fire Protection, of the Draft EIR, potential impacts related to provision of fire flow to accommodate the project would be reduced to a less than significant level.

(3) Cumulative Impacts

The related projects would have an average daily water demand of approximately 2,063 AFY. The project in conjunction with the related projects would yield a total average water demand of approximately 2,197 AFY. LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The LADWP's 2005 UWMP projects that annual water demand would reach 776,000 AF by 2030, reflecting a 17 percent increase from 2005. The estimated demand generated by the project in conjunction with the related projects would fall within the available and projected water demand of LADWP's 2005 UWMP. Furthermore, under the provisions of SB 610 and SB 221, LADWP is required to prepare a comprehensive water supply assessment for every new development "project" within its service area. Given that the UWMP plans and provides for water supplies to serve existing and projected needs, including those of future growth and development as may occur through related projects, and that the requirements of SB 610 and SB 221 provide means to ensure that the water supply needs of notable development projects are carefully considered relative to LADWP's ability to adequately meet future needs, it is anticipated that LADWP would be able to supply the demands of the proposed project and related projects through the foreseeable future, and no significant cumulative impacts related to water demand would occur.

(4) Mitigation Measures

The proposed project would not result in significant environmental impacts relating to domestic water supply, and therefore, mitigation measures are not required. Please refer to Section IV.I.1, Public Services – Fire Protection, for mitigation regarding fire flow.

(5) Level of Significance After Mitigation

No significant impacts to the City's water supply would occur as a result of the proposed project.