IV. ENVIRONMENTAL IMPACT ANALYSIS
H. LAND USE

1. INTRODUCTION

Development on the project site is guided by policies and regulations set forth in local and regional plans and the applicable zoning. The provisions set forth in these plans have been adopted for the purpose of eliminating or reducing potential land use impacts as a result of development within their jurisdictional boundaries. This section provides an analysis of the potential impacts of the proposed project with regard to consistency with applicable land use regulations, as well as the compatibility of the proposed project with the surrounding uses in the area. Secondary environmental effects caused as a result of the land use relationships analyzed in this section are addressed in other sections of the Draft EIR.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

(1) Project Site

The project site is located within the City of Los Angeles at the northeastern-most corner of Century City and is bounded by Santa Monica Boulevard and Moreno Drive as shown in **Figure IV.H-1**, *Project Site and Surrounding Land Uses*, below.[1] Century City, which is located approximately 8.5 miles west of downtown Los Angeles and 6 miles northeast of the Pacific Ocean, is served by three major arterials: Santa Monica Boulevard, Olympic Boulevard, and Pico Boulevard. Century City and the project site also have nearby access to Interstate 405 (San Diego Freeway) via Santa Monica Boulevard. In this area, Santa Monica Boulevard serves as the north boundary of the West Los Angeles Community Plan. The east edge of Century City, which is positioned in the most northerly section of the West Los Angeles Community Plan northerly section of the West Los Angeles Community Plan, also forms the jurisdictional boundary between the cities of Los Angeles and Beverly Hills.

As described in Section II, Project Description, of this Draft EIR, the approximately 2.4-acre (104,350-square-foot) project site is currently vacant. The parcel was formerly occupied by approximately 130,500 square feet of office and restaurant uses and a free-standing parking structure, all of which were demolished in 2005. The project site has been subsequently graded and is currently enclosed by construction fencing.

The project site is designated as Regional Commercial Center in the Los Angeles General Plan, the West Los Angeles Community Plan, and the Century City North Specific Plan (CCNSP). The project site is also located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan (West LA TIMP) Area.

[1] *Century City is located on a northwest-southeast axis, with Santa Monica Boulevard running in a northeast/southwest direction. If the orientation of Santa Monica Boulevard were assumed to be east-west, for the sake of simplicity, the location of the project site may also be identified as the northeast corner of Century City. Accordingly, the following land use discussion describes true northwest as "north," true northeast as "east," true southeast as "south," and true southwest as "west." Therefore, the edge of the project site fronting Santa Monica Boulevard is described as "north."*

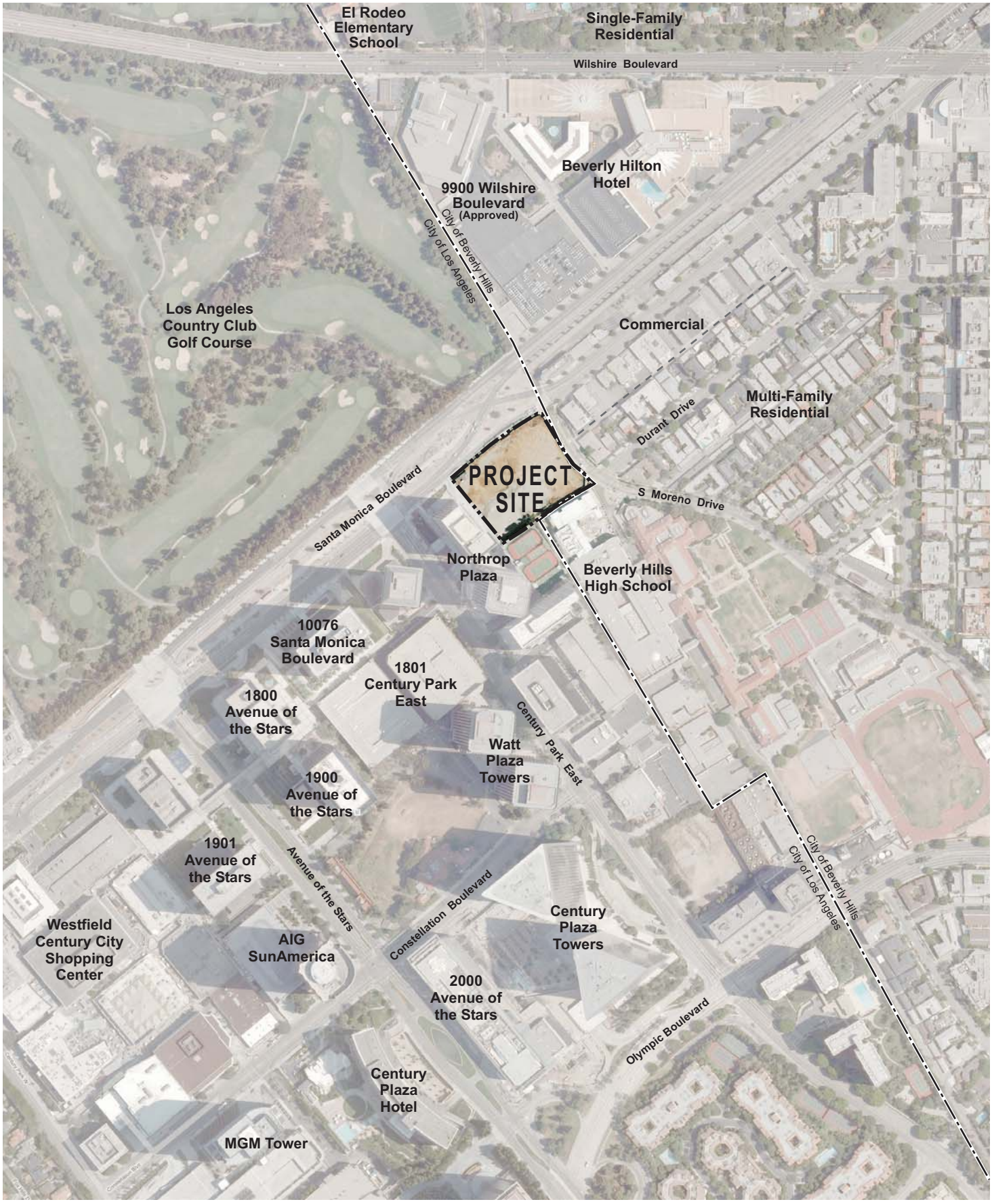
The existing zoning of the project site is C2-2-0, consistent with the designations of the applicable land use plans. The C2 portion of this designation indicates that the site is zoned for commercial uses. As the C2 zoning is cumulative, it also permits multi-family residential uses consistent with the R4 zone. The second part of this zoning designation ("2") indicates that the site is located in Height District No. 2, which allows for a permitted floor area ratio (FAR) of 6.0:1. The zoning designation does not restrict building height. The third part of this zoning designation ("O") indicates that the project site is within a Supplemental Oil Drilling District.

(2) Surrounding Uses

Century City borders the project site on east and south. Century City was originally conceived as a "city within a city" under a master plan designed by Welton Beckett and Associates in the late 1950s. At that time, the future Century City site comprised Twentieth Century Fox's 180-acre back lot. Currently, approximately 50,000 people work in or visit Century City every day; over 6,500 residents are housed in a variety of condominiums, townhomes, and high-rise units; and Century City features a total of 25, primarily office, high-rise buildings. Although office towers are the predominant use in Century City's business "core," existing residential uses in Century City are generally located in the vicinity, or south of, Olympic Boulevard. The 42-story Century residential tower is located at the northwest corner of Avenue of the Stars and Olympic Boulevard; the 28-story Century Towers residential complex is located just northeast of Avenue of the Stars and Pico Boulevard; the 20-story Park Place residential towers are located south of Olympic Boulevard just north of Galaxy Way; and the mid-rise Century Hill residential condominiums are located just south of Galaxy Way south of Olympic Boulevard. The low-rise Century Woods condominium complex is located just northeast of Century Park West and Olympic Boulevard. The Fox Studios production lot is located between Olympic and Pico Boulevards, to the south and west of Century City's modern commercial and residential neighborhoods.

Century City's business "core" has been designed as a grid consisting of primarily office towers located within broad setbacks from the streets. However, the business "core" is currently undergoing a transition from primarily office uses to a greater mix of office, retail, restaurant, and residential uses. Recent development includes the 2000 Avenue of the Stars project which provides a 15-story office building, a new 10,000 square-foot Cultural Pavilion, retail services, and restaurants. This development is located approximately two blocks south of the project site. Approved projects include the renovation of the 22-acre Westfield Century City Shopping Center ("New Century Plan"), which entails the demolition of two office buildings at Santa Monica Boulevard/Avenue of the Stars, new office uses (although net office floor area would be decreased from 360,964 square feet to 106,523 square feet), a net increase of 358,881 square feet of retail and restaurant uses, and approximately 262 multi-family units. The new retail buildings would have heights up to 75 feet and proposed residential uses would be located in a tower rising to 39 stories. The Westfield Century City Shopping Center is located approximately two blocks west of the project site.

As shown above in Figure IV.H-1, land uses immediately adjacent to the project site include the 15- and 19-story Northrop Plaza buildings and 7-story parking structure, located along the west side of the project site and along a portion of the project site's south boundary. Other nearby high-rise office buildings include the 21-story Century Park Plaza on Century Park East; the twin 23-story Watt Plaza Towers and twin 44-story Century Plaza Towers, which are located at opposite corners of Century Park East and Constellation Boulevard; and the 26-story 10100 Santa Monica Boulevard building. Other nearby high-rise buildings in Century City include the 28-story, 1900 Avenue of the Stars building; the 36-story MGM Tower; the 39-story



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N

0 500 Feet

Project Site and Surrounding Land Uses

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE **IV.H-1**

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AIG-SunAmerica Center; the 39-story Fox Plaza Tower; the 18-story Century Park Medical Plaza Tower; the 18-story Park Hyatt Hotel; and the 17-story Century Plaza Hotel and Spa.

To the west of Century City along Santa Monica Boulevard, land uses are generally mid- and low-rise commercial buildings, with some multi-family uses. Low-density, single-family neighborhoods are located to the south and west of Century City and north of Santa Monica Boulevard, to the west of the Los Angeles Country Club Golf Course.

As previously discussed, Century City's east boundary forms the jurisdictional boundary between the cities of Los Angeles and Beverly Hills. The Beverly Hills boundary runs along Moreno Drive along the east boundary of the project site and then, jogs behind the project site to form a section of the project site's south boundary. Beverly Hills High School is located directly to the south of the project site, south of the jurisdictional boundary. The nearest Beverly Hills High School building to the project site is the recently completed 4-story Science and Technology building. This building is separated from the project site by an approximate 20-foot dedicated private drive within the school campus. As with Beverly Hills High School, which is located at the west side of Moreno Drive, the land uses to the east of Moreno Drive are also located in the City of Beverly Hills. Nearby land uses in the City of Beverly Hills include C-3A-zoned commercial uses fronting South Santa Monica Boulevard directly across Moreno Drive from the project site, and R4-zoned multi-family residential uses fronting Durant Drive, Robbins Drive, and Young Drive, directly across Moreno Drive from the project site and Beverly Hills High School. The City of Beverly Hills imposes 45-foot height limits in both the C-3A and R4 zones in this area.

Although Moreno Drive terminates at Santa Monica Boulevard, the City boundary continues north across Santa Monica Boulevard in alignment with Moreno Drive. The east edge of the Los Angeles Country Club Golf Course, which is located in the City of Los Angeles directly north of the project site, forms the Los Angeles/Beverly Hills jurisdictional boundary. Adjoining the golf course property just to the north/northeast of the project site are the former Robinsons-May Department Store and surface parking lot in the City of Beverly Hills. The Beverly Hilton Hotel adjoins these uses to the east. The Robinsons-May site and the Beverly Hilton Hotel are accessed from Wilshire and Santa Monica Boulevards via Merv Griffin Way.

This area of Beverly Hills is also undergoing a transition to provide more high-density housing. The Beverly Hilton Hotel site is currently known as the "Beverly Hilton Revitalization Project." This project includes approximately 120 residential units. The Robinsons-May property was previously approved for a mixed-use project, known as "9900 Wilshire;"[2] however, this site was recently sold and the future use of the site is currently unknown.

b. Regulatory Framework

The following discussion identifies and generally describes the regulatory plans and policies and ordinances that would be applicable to development at the site of the proposed project. Specific provisions of those documents that pertain to the project are listed in the Impact Analysis section below and evaluated for consistency with the project features.

[2] *Approved by the City of Beverly Hills, April 11, 2008.*

(1) Local Plans and Zoning

(a) City of Los Angeles General Plan

California state law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals. The General Plan must: (1) identify the need and methods for coordinating community development activities among all units of government; (2) establish the community's capacity to respond to problems and opportunities; and (3) provide a basis for subsequent planning efforts. The City of Los Angeles General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of state-mandated elements including Transportation, Noise, Safety, Housing, and Open Space/Conservation. Elements of the General Plan also include the General Plan Framework, discussed below, and the West Los Angeles Community Plan, which guides land use at the community level.

(b) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan. The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans.

The General Plan Framework Land Use Chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City's residential neighborhoods and commercial districts. Century City is designated as a "Regional Center" under the General Plan Framework and as such, is designated as a high-density place, and a focal point of regional commerce, identity, and activity.[3] Table 3-1 of the General Plan Framework lists the following as "encouraged uses"[4] within a Regional Center:

- Corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities, hotels, and similar uses;
- Mixed-use structures integrating housing with commercial uses;
- Multi-family housing (independent of commercial);
- Major transit facilities;
- Inclusion of small parks and other community-oriented activity facilities.

The development of sites and structures integrating housing with commercial uses is encouraged in Regional Centers, in concert with supporting services, open space, and amenities.[5] The density of Regional Centers

[3] *City of Los Angeles General Plan Framework, Long-Range Land Use Diagram, West/Coastal Los Angeles.*

[4] *General Plan Framework, Table 3-1, Land Use Standards, page 3-23.*

[5] *General Plan Framework., page 3-40.*

also supports the development of a comprehensive and inter-connected network of public transit and services.[6]

The Housing Chapter of the General Plan Framework states that housing production has not kept pace with the demand for housing.[7] According to the General Plan Framework, the City of Los Angeles has insufficient vacant properties to accommodate the projected population growth and the supply of land zoned for residential development is the most constrained in the context of population growth forecasts.[8] The Housing Chapter states that new residential development will require the recycling and/or intensification of existing developed properties.[9] The General Plan Framework states that the City must strive to meet housing needs of the population in a manner that contributes to stable, safe, and livable neighborhoods, reduces conditions of overcrowding, and improves access to jobs and neighborhood services.[10]

The Urban Form and Neighborhood Design Chapter of the General Plan Framework establishes the goal of creating a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and Citywide scales. "Urban form" refers to the general pattern of building height and development intensity and the structural elements that define the City physically, such as natural features, transportation corridors, activity centers, and focal elements. "Neighborhood design" refers to the physical character of neighborhoods and communities within the City. The General Plan Framework does not directly address the design of individual neighborhoods or communities, but embodies generic neighborhood design and implementation programs that guide local planning efforts and lay a foundation for the updating of community plans. With respect to neighborhood design, the Urban Form and Neighborhood Design Chapter encourages growth in regional centers, which have a sufficient base of both commercial and residential development to support transit service.

The Open Space and Conservation Chapter of the General Plan Framework calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply, and therefore suggests that vacated railroad lines, drainage channels, planned transit routes and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

The Transportation Chapter of the General Plan Framework includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. The Transportation Chapter acknowledges that the quality of life for every citizen is affected by the ability to access work opportunities and essential services, affecting the City's economy, as well as the living environment of its citizens.[11] The Transportation Chapter stresses that transportation investment and

[6] *General Plan Framework, page 3-40.*

[7] *General Plan Framework, page 4-1.*

[8] *General Plan Framework, page 4-1.*

[9] *General Plan Framework, page 4-1.*

[10] *General Plan Framework, page 4-2.*

[11] *General Plan Framework, page 8-2.*

policies will need to follow a strategic plan, including capitalizing on currently committed infrastructure and adoption of land use policies to better utilize committed infrastructure. The Transportation Chapter of the General Plan Framework is implemented through the Transportation Element of the General Plan.

(c) Do Real Planning Guidelines

The Do Real Planning guidelines are a set of guidelines prepared by the City Planning Commission, and used by the Planning Department in implementing the Department's Strategic Plan. Do Real Planning includes fourteen points to guide planning activities for the City and help the City in implementing existing City Plans and Policies. These points are intended to set the City on a course toward sustainability. However, these guidelines do not replace or supersede any adopted policies. Many of the fourteen points address procedures for the operations of the City Planning Department and/or issues isolated to specific settings and types of projects that are different from the proposed project. Of the fourteen points, several address planning concepts that are relevant to the proposed project. Points of particular note are those that pertain to (1) location of land uses and density (Points 3 and 6), site design/walkability/parking location (Points 1, 2, 9 and 12), improvement of housing stock (Point 5), and green design with abundant landscaping (Points 7 and 8). Point 1, "Demand a Walkable City" has led to the development of a "Walkability Checklist," discussed below.

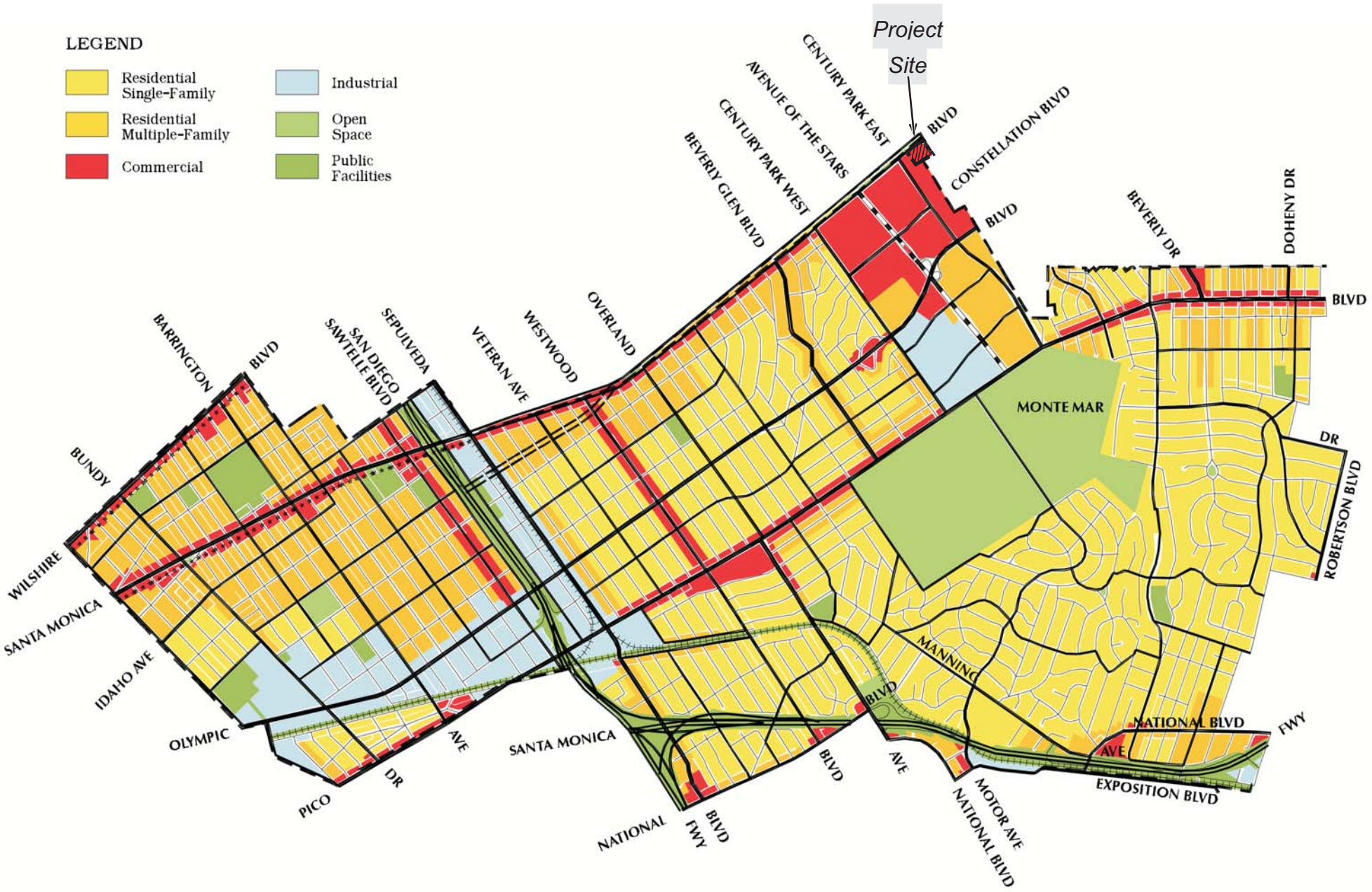
(d) Walkability Checklist

The City of Los Angeles Walkability Checklist for Site Plan Review (Walkability Checklist) is a program created by the City's Urban Design Studio that specifies urban design guidelines for projects required to undergo Site Plan Review. The Walkability Checklist consists of a list of design elements intended to improve the pedestrian environment, protect neighborhood character, and promote high quality urban form. The Walkability Checklist is to be used by City planners to assess the pedestrian orientation of a project. The suggested design guidelines are consistent with the General Plan and supplement applicable Community Plan requirements, but are not considered mandatory. The guidelines address such topics as building orientation, building frontage, landscaping, off-street parking and driveways, building signage, and lighting within the private realm, and sidewalks, street crossings, on-street parking, and utilities in the public realm.

(e) West Los Angeles Community Plan

The land use policies and standards of the General Plan Framework and the General Plan Elements are implemented at the local level through the community planning process. Community plans are oriented toward specific geographic areas of the city, defining locally the General Plan Framework's more general policies and programs and are intended to promote an arrangement of land uses, streets, and services that will encourage and contribute to the economic, social, and physical health, safety, welfare, and convenience of the people who live and work in the community. Goals, objectives, policies, and programs are created to meet the existing and future needs of the community through year 2010. As shown in **Figure IV.H-2**, *West Los Angeles Community Plan Designations*, the West Los Angeles Community Plan designates Century City, north of Olympic Boulevard, as Commercial. As previously discussed, the (Commercial) zones in the City of Los Angeles are cumulative in that they allows uses associated with less intense zones, including residential or mixed residential/commercial uses.

Issues in the West Los Angeles Community Plan that pertain to residential uses include: (1) the need to protect low-density residential uses from encroachment from spillover traffic or commercial off-street parking; (2) usable open space and recreational facilities in multiple-family housing; (3) lack of transition in



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West Los Angeles Community Plan Designations

10000 Santa Monica Boulevard

Source: City of Los Angeles, Department of City Planning.

FIGURE
IV.H-2

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scale, density, and character between commercial and industrial uses and single- and multiple-family areas; and (4) the need to coordinate new development with the availability of public infrastructure. Opportunities that are applicable to residential development include the area's diverse and socially and economically vibrant community, with unique architectural and historic characteristics; proximity of cultural and intellectual resources such as museums, theaters, and educational institutions, as well as recreational and ocean amenities; proximity to Los Angeles International Airport; access to major freeways and employment centers in downtown Los Angeles and Century City; and potential for mixed-use development along Santa Monica, Wilshire, and Sawtelle Boulevards.[12]

The West Los Angeles Community Plan also describes transportation as a significant land use issue, citing traffic congestion along major transportation corridors; inadequate transportation linkages between residential areas and commercial, retail, and recreational facilities; inadequate automobile alternatives such as rail, bus service, and streets or paths which encourage biking and walking; and spillover parking from commercial areas into residential areas.[13] The West LA TIMP is described in the West Los Angeles Community Plan as a transportation-related opportunity in that it mitigates the impact of new development on the circulation system through transportation impact fees for non-residential projects. Transportation opportunities also described in the West Los Angeles Community Plan include improved and expanded bicycle lanes, coordinated with systems in adjacent communities; implementation of traffic mitigation measures for major projects; and the Los Angeles County Metropolitan Transit Authority (MTA) street improvements on Santa Monica Boulevard. Bicycle lanes are intended to provide access to major activity centers, schools, and recreation areas; whereas, the MTA plan (which has now been implemented) is noted as a means of improving traffic flow, reducing congestion, and enhancing the appearance of Santa Monica Boulevard.[14]

The West Los Angeles Community Plan sets forth goals and objectives to maintain the community's distinctive character by preserving and enhancing the positive characteristics of existing uses which provide the foundation of community identity, such as scale, height, bulk, setbacks, and appearance and maximizing development opportunities around future transit systems while minimizing adverse impacts. Goals, objectives, and policies of the West Los Angeles Community Plan pertinent to residential uses include the provision of a safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the community. Objectives and policies include the development of new housing to meet the diverse economic and physical needs of the existing residents and projected population of the area; and the reduction of vehicular trips and congestion by developing new housing in proximity to adequate services and facilities. Housing policies also include the location of higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development and the requirement of architectural compatibility and adequate landscaping for new multi-family residential development in existing residential areas to protect the character of existing residential neighborhoods. Housing policies are further designed to ensure that new housing opportunities minimize displacement of residents and to encourage multiple-family residential development in specified commercial zones.

[12] *West Los Angeles Community Plan, page I-2 and I-3.*

[13] *West Los Angeles Community Plan., page I-4.*

[14] *West Los Angeles Community Plan, page I-5.*

While the West Los Angeles Community Plan does not mandate mixed-use projects, it encourages mixed-use development in commercially designated areas that have the potential for such uses.[15] The intent of mixed-use development is to provide housing in proximity to jobs and services, to reduce vehicular trips, congestion, and air pollution, to provide for rental housing, and to stimulate pedestrian-oriented areas. The West Los Angeles Community Plan states that the mixed-use concept could accommodate separate commercial and residential structures in the same block.[16]

(f) Century City North Specific Plan (CCNSP)

The project site is also located within the CCNSP area, as shown in**, Figure IV.H-3**, *Century City North Specific Plan Area*, below. Adopted in November 1981, the CCNSP was designed to guide development and redevelopment in the area and to ensure adequate transportation and other public facilities for the high-intensity Century City center. The CCNSP establishes a phasing strategy, consisting of two development phases, to assure orderly development and provide adequate infrastructure with build-out of the existing zoning for the area. The CCNSP limits development in Century City through the assignment of development rights called Cumulative Automobile Trip Generation Potential (CATGP) Trips to parcels within the CCNSP.[17, 18] The first phase of the CCNSP (Phase I) allowed development until projects had used a certain number of development rights or CATGP Trips and required specific street dedications and roadway improvements on Avenue of the Stars, Century Park East, Century Park West, Constellation Boulevard, Pico Boulevard, and Santa Monica Boulevard. The CCNSP's second phase of development began when building permits had been issued for projects generating 15,225.606 CATGP Trips and when all public improvements set forth in the CCNSP Ordinance were completed. Pursuant to City of Los Angeles Case No. CF 98-0672, all Phase I improvements have been completed and the CCNSP is now acting in its second phase.

Development in Phase II is limited to three sources of CATGP Trips. First, a project may use the original Phase I CATGP Trips assigned by the City to parcels in 1981. Second, a project may use Replacement CATGP Trips generated when uses on a parcel are changed or buildings on that parcel are demolished, since a change of use or demolition of these buildings frees the parcel for replacement development.[19] Third, a project may have CATGP Trips transferred to the project site from another parcel within the Century City North Specific Plan. A limited number of CATGP Trips may also be transferred from the Century City South Specific Plan area to lots within the Century City North Specific Plan area. In order for a transfer of CATGP Trips to occur, the Director of City Planning must certify in writing that the transfer conforms to the provisions of the CCNSP.[20] The CCNSP defines a project as "any building, structure or addition to any building or structure to be constructed on a lot within the Specific Plan Area, excluding any construction or renovation activity that does not add to CATGP."

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[15] *West Los Angeles Community Plan., page III-6.*

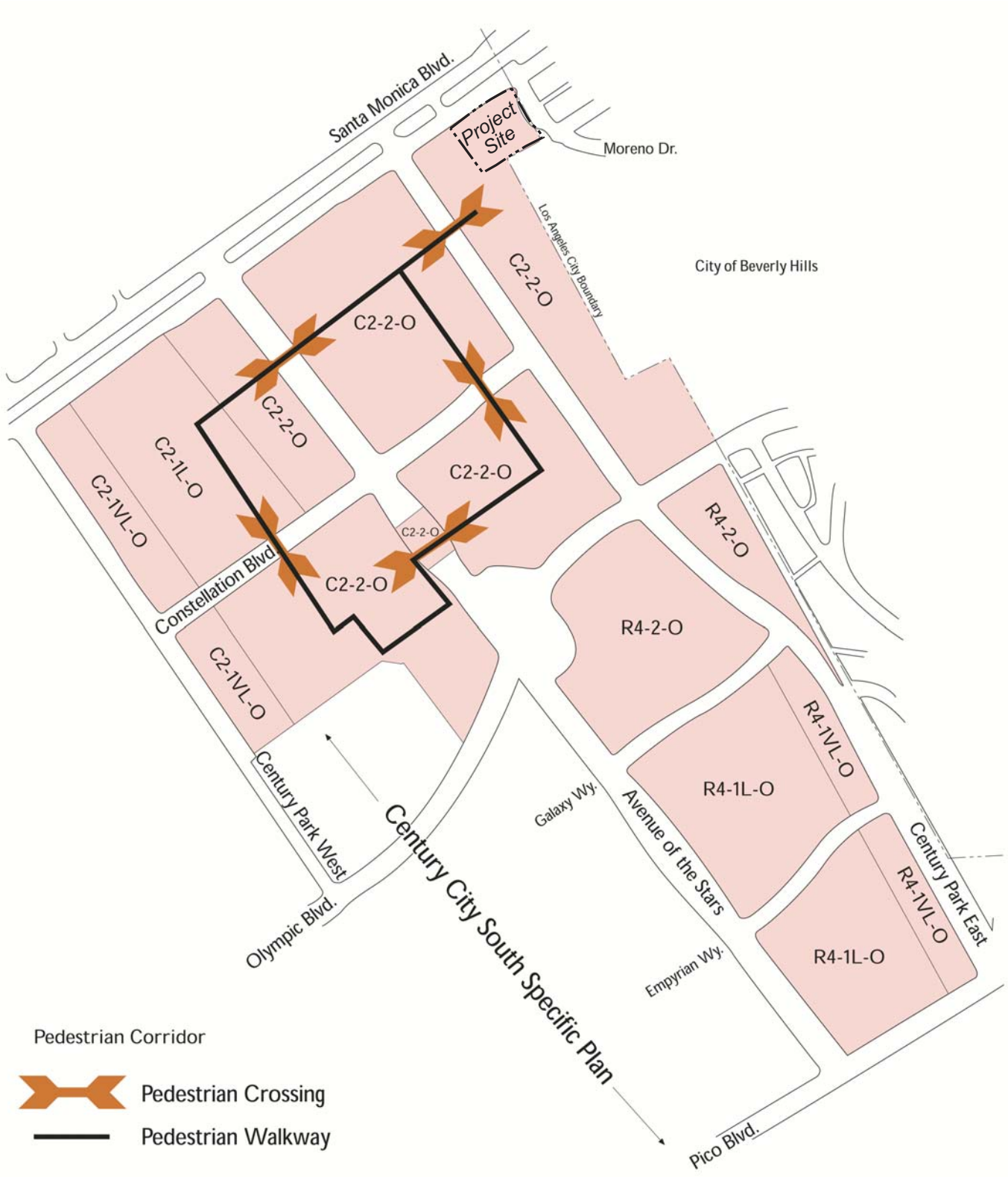
[16] *West Los Angeles Community Plan, page III-6.*

[17] *Cumulative Automobile Trip Generation Potential (CATGP) is defined as "the cumulative total daily Trips generated by all Projects on commercially zoned lots within the Specific Plan Area for which building permits are issued subsequent to November 15, 1981," based on CATGP Trip generation factors specified within the Specific Plan. (Century City North Specific Plan, Section 2, page 2.)*

[18] *CATGP Trips are defined as a "unit of real property development rights pursuant to this Specific Plan and means a calculation of daily arrivals at and daily departures from a building or structure by motor vehicles of four or more wheels. The number of Trips generated by any Project or existing building or structure shall be calculated utilizing the table set forth in the definition of Cumulative Automobile Trip Generation Potential." (Century City North Specific Plan, Section 2, page 5.)*

[19] *CCNSP Sections 3.C.3 and 3.C.4*

[20] *CCNSP Section 5.*



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Century City North Specific Plan Area

10000 Santa Monica Boulevard

Source: City of Los Angeles
(General Plan - Specific Plan) November 24, 1981

FIGURE
IV.H-3

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A record of allocated CATGP Trips for Century City and individual parcels is maintained by the Los Angeles Department of City Planning. Based on City Planning's January 1, 2010 Trip Allocation Chart, 2,143.4616 Replacement CATGP Trips are available on the project site.

The CCNSP area is divided into "Core" and "Buffer" Areas. The project site is located within the Buffer Area, which provides for a floor area ratio (FAR) of 4.5 to 1.

(g) Greening of Century City Pedestrian Connectivity Plan

The Greening of Century City Pedestrian Connectivity Plan (May 2007) is a Planning Commission approved City of Los Angeles Planning Department guideline for Century City as a model of sustainable living. It is intended to promote the integration of residential, commercial businesses, retail, cultural, hospitality, and entertainment uses; by incorporating new high-density residential and retail projects within its commercial center; and by providing an interconnected network of pedestrian walkways, bicycle paths and public transit. Much of the Greening of Century City Pedestrian Connectivity Plan's focus is to enhance Century City as a 24-hour, 7-day sustainable, walkable neighborhood. The Greening of Century City Pedestrian Connectivity Plan sets forth innovative streetscape design, an open space network, and art program to create a vibrant live-work-play community. The guiding principles of the plan are (1) improved pedestrian experience; (2) enhanced transit connectivity; (3) a more beautiful public realm; (4) updated identity, and (5) a sustainable Century City. The Greening of Century City Pedestrian Connectivity Plan sets forth urban design guidelines to support each of these principles, which incorporate policies and specific design guidelines. In addition, the Greening of Century City Pedestrian Connectivity Plan provides concept design for each of Century City's thoroughfares, including Santa Monica Boulevard.

(h) West Los Angeles Transportation Improvement and Mitigation Specific Plan

The project site is also located within the boundaries of the 1997 West LA TIMP. The West LA TIMP incorporates a broad area between the Hollywood Hills on the north, the City of Santa Monica boundary on the west, the City of Culver City boundary on the south, and the City of Beverly Hills boundary on the east. Among other goals, the purpose of the West LA TIMP is to provide a mechanism to fund specific transportation improvements, regulate the phased development of land uses, prevent peak hour level of service (LOS) on streets and intersections from reaching LOS "F" or, if presently at LOS "F" preclude further deterioration in the LOS, and promote neighborhood protection programs to minimize intrusion of commuter traffic through residential neighborhoods. The West LA TIMP establishes specific transportation mitigation standards and procedures, under which no building, grading, or foundation permit can be issued until the Los Angeles Department of Transportation (LADOT) and the City Engineer have certified completion of such measures, or that their completion has been guaranteed to the satisfaction of these departments. A Transportation Impact Assessment (TIA) under the TIMP establishes a fee for new development projects. However, the West Los Angeles TIMP exempts multi-family projects from TIA fees. Mitigation measures are based on the potential significant transportation impact of the proposed project during the P.M. peak hour.[21]

[21] *West Los Angeles Transportation Improvement and Mitigation Specific Plan, page 8 (March 8, 1997).*

(i) City of Los Angeles Municipal Code

The City of Los Angeles Municipal Code (LAMC), Chapter 1 (Planning and Zoning Code) defines the range of zoning classifications throughout the City and provides the specific permitted uses applicable to each designation. The Planning and Zoning Code is cumulative under most zoning categories, so that lesser intensity uses are allowed in higher intensity zones. For instance single-family uses are permitted in multi-family zones and multi-family uses are permitted in commercial zones. As shown in **Figure IV.H-4,** *Zoning Map,* the project site is designated as C2-2-O which, under Planning and Zoning Code Section 12.14, provides for a variety of office, retail, and multi-family uses.

LAMC Sec. 12.14 refers to multi-family standards in other areas of the code (including Section 12.11) regarding the maximum number of permitted dwelling units, off-street parking, building setbacks, usable open space, and other development features applicable to multi-family uses. The project site is designated Height District No. 2, which, permits development at an FAR of 6.0:1.

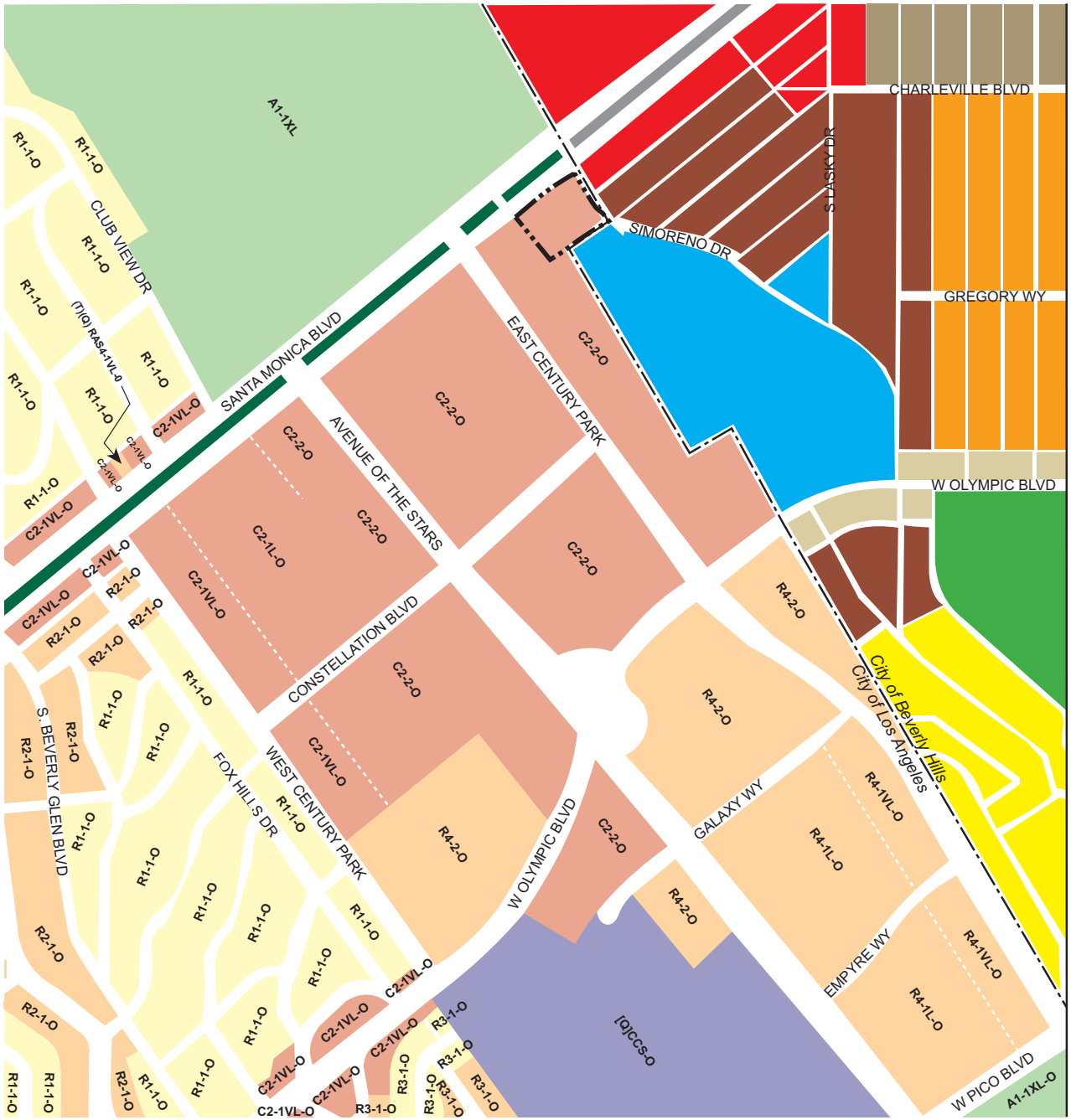
The site is also designated as being in an "O" Oil Drilling District, which is defined in the Planning and Zoning Code as districts where the drilling of oil wells or the production from the wells of oil, gas, or other hydrocarbon substances is permitted. No petroleum storage or extraction activities presently occur within the project site. However, the project site is located within an area designated as a methane zone by the City of Los Angeles.[22] All new buildings and paved areas located in a methane zone are required to test underlying soils for any detectable methane gas, as required under the methane gas seepage regulations (LAMC Building Regulations, Division 71). The concentration of detectable methane would determine the types of design features required to mitigate methane seepage. Please see Chapter IV.F, *Hazards and Hazardous Materials*, of this Draft EIR, for further discussion of this issue.

Commercial land uses surrounding the project site within Century City are similarly zoned C2-2-O, allowing for the same range of uses as the project site. The residential use located at the corner of Olympic Boulevard and Century Park West as well as the south of Olympic Boulevard is zoned R4-2-O, a multi-family residential zone with certain limitations. Single-family residential neighborhoods in the R-1 zone are located just west of Century City, to the north of Olympic Boulevard and Santa Monica Boulevard. The Los Angeles Country Club Golf Course, north of Santa Monica Boulevard, is zoned A-1 to correspond to the open space use of the golf course.

(j) Adjacent Zoning in Beverly Hills

As indicated previously, the cities of Los Angeles and Beverly Hills jurisdictional boundary is located just to the east of the project site. Within the City of Beverly Hills, the commercial uses along South Santa Monica Boulevard, that are directly across Moreno Drive from the project site are zoned C-3A. Beverly Hills High School, which is located directly south of the project site, is zoned S (Public School Zone). The area across Moreno Drive directly across from the project site and Beverly Hills High School are zoned R-4 (multi-family residential).

[22] *City of Los Angeles Department of Public Works, Methane Ordinance Map A-20960, City Ordinance No. 175,790, February 4, 2004.*



LEGEND

City of Los Angeles

- **Single-Family Residential Zones** (RE,RS,R1,RU,RZ,RW1)
- **Multiple-Family Residential Zones** (R2,RD,RMP,RW2,R3,R4,R5)
- **Commercial** (ADP,C1,C1.5,C2,C4,C5,CR,CW,LASED,WC)
- **Industrial** (CM,MR,CCS,M1,M2,M3,SL)
- **Agricultural** (A,RA)
- **Public Facilities** (PF)

City of Beverly Hills

Single-Family Residential Zones

- R-1 - One-Family Residential Zone
- R-1.5X - One-Family Residential Zone

Multiple-Family Residential Zones

- R-4 - Multiple Residential Zone
- R-4X1 - Residential Income and Multiple Dwelling Zone
- R-4X2 - Multiple Residential Zone

Commercial Zones

- C-3 - Commercial Zone

Other Zones

- S - Public School Zone
- Park, Institutional Parking Zone
- Project Site

PCR

N

Zoning Map

10000 Santa Monica Boulevard

Source: City of Los Angeles Department of City Planning;
City of Beverly Hills Department of Community Development, Planning.

FIGURE
IV.H-4

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(2) Regional Plans

(a) Southern California Association of Governments (SCAG)

SCAG is the designated regional planning agency for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura and Imperial. SCAG is a joint powers agency with responsibilities pertaining to regional issues. SCAG's current land use policies are set forth in the 2008 Regional Transportation Plan, and the Compass Growth Vision, in conjunction with its constituent members and other regional planning agencies.

(i) Regional Transportation Plan

The 2008 Regional Transportation Plan (RTP) adopted by SCAG in May 2008, is a multi-modal plan, which as discussed in the RTP, represents SCAG's vision for a better transportation system that will integrate land use into transportation planning to make the region "function as best that it can" over the RTP horizon of 2035.[23] The RTP is the culmination of a multi-year effort focusing on maintaining and improving the transportation system through a balanced approach that considers system preservation, system operation and management, improved coordination between land use decisions and transportation investments, and strategic expansion of the system to accommodate future growth. The RTP includes goals and policies that pertain to mobility, accessibility, safety, productivity of the transportation system, protection of the environment and energy efficiency, and land use and growth patterns that complement the state and region's transportation investments.

(ii) Compass Blueprint Growth Vision

In an effort to maintain the region's prosperity, continue to expand its economy, house its residents affordably, and protect its environmental setting as a whole, SCAG has collaborated with interdependent sub-regions, counties, cities, communities and neighborhoods in a process referred to by SCAG as Southern California Compass, which resulted in the development of a shared Growth Vision for Imperial, Los Angeles, Orange, Riverside, San Bernardino and Ventura Counties. SCAG began Compass Blueprint in 2002, spearheaded by the Growth Vision Subcommittee, which consists of civic leaders from throughout the region. The shared regional vision sought to address issues such as congestion and housing availability, which may threaten the region's livability.

The underlying goal of the growth visioning effort is to make the SCAG region a better place to live, work, and play for all residents. To organize the strategies for improving the quality of life in the SCAG region, four principles were established by the Growth Vision Subcommittee. These goals are contained in the Compass Blueprint Growth Vision Report. The principles are intended to promote and maximize regional mobility, livability, prosperity and sustainability. Decisions regarding growth, transportation, land use and economic development should support and be guided by these principles. Specific policy and planning strategies also are provided as a way to achieve each of the principles.

In addition, the Compass Blueprint 2% Strategy provides guidance for how and where SCAG can implement the Growth Vision goals for the region's future. The strategy calls for modest changes to current land use and transportation trends on 2% of the land area of the region. As indicated on the 2% Strategy Opportunity Areas map for the City of Los Angeles – Central, the site is located within a Compass 2% Strategy Opportunity

[23] *SCAG, 2008 RTP: Making the Connection (http://SCAG.ca.gov/rtp2008/index.html).*

Area. As such, the site is within a key target area that, if developed at higher density, would help best serve the mobility, livability, prosperity and sustainability goals of the Growth Vision.

(b) Air Quality Management Plan

The Air Quality Management Plan (AQMP) of the South Coast Air Quality Management District (SCAQMD) presents strategies for achieving the air quality planning goals set forth in the Federal and California Clean Air Acts (CCAA), including a comprehensive list of pollution control measures aimed at reducing emissions. The SCAQMD, which was established in 1977 pursuant to the Lewis-Presley Air Quality Management Act, is responsible for bringing air quality in the South Coast Air Basin (Basin) into conformity with federal and State air pollution standards. The SCAQMD is also responsible for monitoring ambient air pollution levels throughout the Basin and for developing and implementing attainment strategies to ensure that future emissions will be within federal and State standards. The AQMP, last amended in 2007, is addressed in Section IV.B, *Air Quality*, of this EIR (please refer to Section IV.B for a discussion of the project's consistency with the AQMP).

(c) Congestion Management Program

The Los Angeles County Metropolitan Transportation Authority (Metro) administers the Congestion Management Program (CMP), a State-mandated program designed to provide comprehensive long-range traffic planning on a regional basis. On October 28, 2010 the Metro Board adopted the 2010 CMP for Los Angeles County. The 2010 CMP summarizes the results of 18 years of CMP highway and transit monitoring and 15 years of monitoring local growth. CMP implementation guidelines for local jurisdictions are also contained in the 2010 CMP. The primary goal of the CMP is to reduce traffic congestion in order to enhance the economic vitality and quality of life for affected communities. CMP guidelines specify that those freeway segments to which a proposed project could add 150 or more trips in each direction during the peak hours be evaluated. The guidelines also require evaluation of designated CMP roadway intersections to which a proposed project could add 50 or more trips during either peak hour. The project's consistency with the CMP is discussed in Section IV.K, *Transportation and Circulation*, of this EIR.

3. PROJECT IMPACTS

a. Methodology

The analysis of potential land use impacts considers consistency of the project with adopted plans and policies that regulate land use on the project site, as well as the compatibility of proposed uses with surrounding land uses. The determination of consistency with applicable land use policies and ordinances is based upon a review of the previously identified planning documents that regulate land use or guide land use decisions pertaining to the project site. CEQA Guidelines Section 15125(d) requires that an EIR discuss inconsistencies with applicable plans that the decision-makers should address. Evaluations are made as to whether a project is inconsistent with such plans. Projects are considered consistent with regulatory plans if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals. The intention of the evaluation of consistency with regulatory plans is to determine if non-compliance would result in a significant physical impact.

The intent of the compatibility analysis is to determine whether the project would be compatible in relation to use, size, intensity, density, scale, and other physical and operational factors. The compatibility analysis is based on aerial photography, land use maps, and field surveys in which surrounding uses have been identified and characterized. The analysis addresses general land use relationships and urban form, based on a comparison of land use relationships in the project area under existing conditions to the conditions that would occur with project implementation.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts with regard to Land Use. These questions are as follows: Would the project:

a. Physically divide an established community.

b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect

c. Conflict with any applicable habitat conservation plan or natural community conservation plan.

As discussed in the Initial Study, which is contained in Appendix A of this EIR, and in Chapter VI, Subsection F, Effects Found Not to be Significant, of this EIR, the project would have no impact with respect to habitat conservation plans or natural community conservation plans. As such, no further analysis of this topic is necessary.

In the context of these questions from Appendix G of the CEQA Guidelines, the *City of L.A. CEQA Thresholds Guide (2006*) states that impacts regarding land use be made on a case by case basis considering the following factors:

(1) Land Use Consistency

- Whether the proposal is inconsistent with the adopted land use/density designation in the existing Community Plan, Redevelopment Plans or Specific Plans for the Site.
- Whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans.

Based on these factors, the proposed project would have a significant impact on land use if:

LU-1: The project were in substantial conflict with the adopted General Plan, Community Plan, Specific Plan, or with applicable environmental policies in other regional and local plans.

(2) Land Use Compatibility

- The extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area;

- The extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated and the duration of the disruptions; and
- The number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the project.

Based on these factors, the proposed project would have a significant impact on land use if it would:

LU-2: Substantially and adversely change the existing relationships between numerous land uses or properties in a neighborhood or community or have the long-term effect of adversely altering a neighborhood or community through ongoing disruption, division or isolation.

c. Project Design Features

As described in Chapter II, *Project Description*, the project would include 283 residential units and a total floor area of 469,575 square feet to be provided on a lot with approximately 104,350 square feet of land area. The up to 39-story residential building would be constructed on the northern portion of the site along Santa Monica Boulevard, away from Beverly Hills High School and multi-family residential uses to the south and southeast. It would have a narrow floorplate and a maximum building height of 460 feet.[24]

The ancillary building would be located to the west of the residential tower, with a maximum height of 90 feet (40 feet with the Automated Parking Option). However, the frontage along Santa Monica Boulevard would be lower with a maximum height of up to 40 feet (20 feet with the Automated Parking Option).

The project would provide approximately 112,352 square feet of usable open space (112,746 square feet with the Automated Parking Option), including 82,052 square feet of common open space. Of the open space, approximately 43,141 square feet would be located at ground level and landscaped to create an overall garden feel outward from the project site to the street. This open space, along with improved landscaping along the adjacent sidewalks, and building setbacks that are equal to or greater the site's required setbacks with substantially greater setbacks at many locations would provide buffering from adjacent uses and enhance the pedestrian qualities adjacent to the project site.

As described in Chapter II of this EIR, Subsection F, *Necessary Approvals*, proposed land use approvals include the following approvals:

- Vesting Tentative Tract Map and Haul Route;
- Project Permit Compliance Review, including Site Plan Review;
- Zoning Administrator Adjustment to permit the project's buildable area to be 4.5:1 FAR based on gross lot area (total of 469,575 FAR square feet);
- Zoning Administrator Adjustment to permit the development of 283 dwelling units, which utilize the Trips already assigned to this site;

[24] *As measured pursuant to the City of Los Angeles Municipal Code.*

- Filing of Form 7460-1, Notice of Proposed Construction or Alteration, with the Federal Aviation Administration for the residential building;
- Grading, excavation, foundation, and associated building permits; and
- Other permits and approvals to be requested or as deemed necessary.

d. Analysis of Project Impacts

Land use impacts for the project's Conventional and Automated Parking Options would be essentially the same. Both would provide the same land use, project density, project activity and project design. The only variation between the two options arises from the lower height of the ancillary building from nine stories above grade to four stories above grade with the Automated Parking Option. While the height of the structure would be reduced, the total number of parking spaces, and related land use activity and land use effect would be the same. The lower height of the parking facility in the Automated Parking Option would slightly reduce the building massing on the project site, and provide reduced air emissions and energy consumption. The following analysis focuses on the Conventional Parking Option, which has greater potential for significant impacts.

(1) Consistency of the Proposed Project with Applicable Plans and Policies

The development of the proposed project would be subject to numerous land use plans, as well as the development regulations in the LAMC's Zoning and Planning Code. The consistency of the proposed project with the regulations and policies of the General Plan Framework, the City's Do Real Planning Program and its related Walkability Checklist, the West Los Angeles Community Plan, the CCNSP, the Greening of Century City Pedestrian Connectivity Plan, the LAMC, and the RCPG are addressed in this chapter. The proposed project's consistency with the AQMP is addressed in Chapter IV.B, *Air Quality*, and the proposed project's consistency with the CMP and the West LA TIMP is addressed in Chapter IV.L, *Traffic and Circulation*, of this Draft EIR.

(a) City of Los Angeles General Plan Framework Element

Table IV.H-1, *Comparison of the Project to Applicable Policies of the General Plan Framework*, evaluates the consistency of the proposed project with policies of the Framework Element. As discussed in Table IV.H-1, the proposed project would be consistent with applicable policies of the General Plan Framework. The proposed project would be consistent with the land uses encouraged in a designated "Regional Center." In addition, the proposed project's residential element would be consistent with the goals of the Framework's Land Use Chapter, in that it would increase activity during the evening hours and weekends and locate a high density residential use in close proximity to jobs, transit, retail uses, and restaurants; thus enhancing a high quality life style. In addition, the proposed project would contribute to the existing diversity of uses in Century City, and provide housing in an area where the production of housing has not kept pace with the demand. By providing high-density housing in this location, the proposed project would be consistent the General Plan Framework's Long-Range Land Use Diagram, which identifies Century City as a Regional Center with an existing range of services and commercial activities.

Table IV.H-1

Comparison of the Project to Applicable Policies of the General Plan Framework Element

Recommendation	Analysis of Proposed Project Consistency
Land Use Chapter	
Goal 3C: Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.	**Consistent.** The proposed project would enhance the quality of life for the City's existing and future residents by redeveloping a currently underutilized site to provide high-quality residential dwelling units with an environmentally conscious sustainable design within Century City, in close proximity to jobs, transit, restaurants, and retail uses. The Project would create a landmark gateway to Century City. The project's landscaped open space would also enhance the quality of life for the City's future and existing residents, with approximately 43,141 square feet of landscaped open space to create an overall garden feel outward from the project site to the public street. The project would also enhance pedestrian activity linking to shopping, recreation, entertainment in both Century City and Beverly Hills, as well as access to nearby job opportunities
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The proposed project would contribute to the diversification of uses in Century City, which currently includes office, retail, hotel, restaurant, entertainment, and multi-family residential uses. The Framework states that "the production of housing has not kept pace with the demand for housing in the City of Los Angeles, and the City has insufficient vacant properties to accommodate the projected population growth" (Framework, Chapter 4, page 1). In this regard, the provision of residential uses would support the needs of the City's existing and future residents, and would provide a residential base that would support the City's businesses.
Policy 3.1.1: Identify areas on the Land Use Diagram and the Community Plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	**Consistent.** Century City is identified as a "Regional Center" on the General Plan Framework's Land Use Diagram. Development of residential units in Century City would serve the needs of existing and future residents and would expand the diversity within this designated Regional Center. The proposed project would be located in close proximity to commercial, retail, entertainment, and restaurant uses. During construction, and upon completion and occupancy, the project is expected to generate new economic activity in the City, including numerous construction jobs and full and part-time jobs for the residential-support uses.
Policy 3.1.4: Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram.	**Consistent.** The project would be consistent with the Framework Element's Long-Range Land Use Diagram, which identifies Century City as a Regional Center targeted for high density growth. The Project would provide approximately 283 residential units with associated amenities at a density consistent with the intent of the Regional Center designation, adjacent to other high density uses.
Policy 3.1.7: Allow for development in accordance with the policies, standards, and programs of specific plans in areas in which they have been adopted.	**Consistent.** The approximately 2.4-acre project site is located within the Century City North Specific Plan, which establishes policies, standards, and programs for future development of the site. The proposed project would be consistent with the CATGP Trip requirements of the CCNSP, as well as other criteria pertaining to the type of development anticipated at the project site in the CCNSP. The policies of the CCNSP relative to the

Table IV.H-1 (Continued)

Comparison of the Project to Applicable Policies of the General Plan Framework Element

Recommendation	Analysis of Proposed Project Consistency
	proposed project are described in greater detail in Table IV.H-3, below.
Objective 3.2: To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**Consistent.** The project would integrate residential housing into a Regional Center, thereby reducing the need for residents to travel elsewhere for jobs, shopping, dining, and entertainment. By providing residential uses near complementary office, retail, entertainment, and other residential uses, and in proximity to existing and proposed transit corridors, the project would reduce the number and length of vehicular trips compared to locating the same residential uses in a more distant suburban location, thereby reducing congestion and air pollution. The project's location and pedestrian amenities would also link the site to nearby job centers. These features would promote pedestrian activity rather than a reliance on vehicles.
Objective 3.4: Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.	**Consistent.** The project would provide 283 new residential units in a Regional Center located along Santa Monica Boulevard Transit Parkway, with numerous public transit opportunities. The project would also be located in close proximity to other major roadways, including Wilshire Boulevard and Olympic Boulevard. Public transit serves these roads as well as the major arterials in Century City. Metro is also proposing to locate a station stop for the Westside Subway Extension (the Purple Line) in Century City in the vicinity of the Project site. Three locations for the station are currently under consideration which range from 0.05 miles to 0.5 miles in distance depending on the selected location. By locating the Project's residential uses within Century City's dense commercial area, the Project would provide housing opportunities outside of existing neighborhoods, thereby helping to preserve those neighborhoods.
Objective 3.7: Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.	**Consistent.** The project would provide multi-family residential development in a highly urbanized area with sufficient public infrastructure and services to meet project needs. The project would be consistent with the provisions of the CCNSP which provides phasing mechanisms for assuring that new development occurs commensurate with available infrastructure. The project would create a substantially landscaped residential interface along the existing pedestrian corridor between residential neighborhoods in Century City and retail, restaurant, and commercial uses along the Santa Monica Boulevard corridor and in the City of Beverly Hills; and between residential neighborhoods in the City of Beverly Hills and entertainment, services, and Westfield retail and grocery in Century City.
Objective 3.10: Reinforce existing, and encourage development of new, regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	**Consistent.** The project would reinforce the existing Century City Regional Center by providing an important residential component complementing Century City's existing office, retail, and dining opportunities. By locating housing within a vibrant commercial and retail area, the project is designed to enhance the urban lifestyle of Century City and nearby Beverly Hills, and to reduce dependence on automobiles. The project's building orientation, design, and pedestrian amenities would link the site to these nearby job centers and retail, and the project would be complemented by open space facing Santa Monica Boulevard and Moreno Drive, with improved streetscape and sidewalks. Accordingly, residents and visitors of the project would be able to access

Table IV.H-1 (Continued)

Comparison of the Project to Applicable Policies of the General Plan Framework Element

Recommendation	Analysis of Proposed Project Consistency
	nearby business, employment, entertainment, and lodging uses with ease.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** The proposed project includes a number of design features that support and enhance the overall pedestrian environment within Century City. Project design features include landscaping and enhanced pedestrian access along Santa Monica Boulevard and Moreno Drive. The landscaping program would include extensively landscaped open space with mature trees, shrubs, and groundcover, and would support the concepts presented in the 2007 Greening of Century City Pedestrian Connectivity Plan so as to enhance the quality of the public thoroughfares and provide an appearance that is consistent with the overall landscaping concept for Century City.
Housing Chapter	
Policy 4.1.1: Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City sub-region to meet the twenty-year projections of housing needs.	**Consistent**: The proposed project would provide 283 new multi-family housing units, thereby contributing to the multi-family housing goals for the City of Los Angeles. The proposed project represents approximately 2.7 percent of the new households projected for the census tracts comprising the West Los Angeles Community Plan (2009 estimated residential units) compared to SCAG's 2020 estimated households (residential units) for the same census tracts (38,200 units in 2009 compared to 48,596 units in 2020 = 10,396 new households).[a] The project combined with related projects in the project study area in the West Los Angeles community would increase housing by 2,160 units (see Sec. IV.H.4, Cumulative Impacts, below), which would amount to approximately 20.7 percent of the anticipated increase in housing in the West Los Angeles community between 2009 and 2020. The project and related projects would contribute to the area's housing supply to help meet the City's long-term projections of housing needs.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher density development and surrounding lower density residential neighborhoods.	**Consistent.** The project would be located within a highly developed urban area along the Santa Monica Boulevard Transit Parkway and is within close proximity to other major roadways, including Wilshire Boulevard and Olympic Boulevard, and the proposed Metro Westside Subway Extension station. The project, which would be situated adjacent to the existing mid- and high-rises in Century City, would maintain the character of the surrounding area. The project would provide open space buffer areas between the project's buildings and the adjacent Beverly Hills High School to the south and multifamily residential uses to the east. The project's ancillary building with parking and residential amenities would be located along the western portion of the site, distant from the multifamily residential uses located in Beverly Hills to the east.
Urban Form and Neighborhood Design Chapter	
Goal 5A: A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and Citywide scales.	**Consistent.** The project would provide a substantial investment in the City and in high-quality urban housing along a major commercial corridor, in a dense urban area, consistent with the vision of the CCNSP. The project would generate local spending by households occupying the proposed residential development, and annual tax revenue for the City, as well as revenue through a variety of development-related fees and taxes, (e.g., Quimby fees and construction fees).

Table IV.H-1 (Continued)

Comparison of the Project to Applicable Policies of the General Plan Framework Element

Recommendation	Analysis of Proposed Project Consistency
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**Consistent.** The project site would be situated on the Santa Monica Boulevard Transit Parkway and within a short walking distance to the Transit Parkway's bus rapid transit (bus rapid transit) station and the future station stop for the Los Angeles Metro Westside Subway Extension in Century City. Three locations for the station are currently under consideration which range from 0.05 miles to 0.5 miles in distance from the project site, depending on the selected location. The Century City area currently functions as a Regional Center.
Policy 5.2.2: Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime.	**Consistent.** Century City is a designated Regional Center consisting of a mixture of high-rise office, commercial, retail, restaurant, entertainment, and residential uses located in close proximity to major roadways, including Santa Monica Boulevard and Wilshire Boulevard. The location of the project within this Regional Center is consistent with the land uses, scale, and built form of the surrounding area and would encourage and support transit use both in daytime and nighttime. The project's complementary uses to the existing commercial and entertainment uses and its connectivity along the Santa Monica Boulevard and Moreno Drive frontages would support daytime and nighttime use.
Open Space and Conservation Chapter	
Policy 6.4.8.a & b: Encourage the improvement of open space, both on public and private property, as opportunities arise. Such places may include the dedication of "unbuildable" areas or sites that may serve as green space, or pathways and connections that may be improved to serve as neighborhood landscape and recreation amenities.	**Consistent.** The project would provide approximately 43,141 square feet of ground level open space, comprising approximately 41 percent of the project site. The landscaping program would include mature trees, shrubs, and groundcover throughout the site; and the Santa Monica Boulevard frontage would transition at the corner of Santa Monica Boulevard and Moreno Drive into a larger expanse of open space. The project would extend an overall garden feel outward from the project site to the public street. This type of expansive open space area would provide a needed complement to the urban nature of Century City, as encouraged by the Community Plan. It would also provide a pedestrian-friendly environment and would enrich the street life by encouraging walking between adjacent uses. The project would also include rooftop open space and recreational amenities, as well as private open space areas. The project's ancillary building would include a 27,579 square foot landscaped roof deck with outdoor pool, sundeck, hot tub and tennis court facility, and would also include a large indoor lap pool. The project would also provide private terraces for many residences, totaling 30,300 square feet.
Transportation	
Objective 3: Support development in regional centers, community centers, major economic activity areas and along mixed-use boulevards as designated in the Community Plans.	**Consistent.** The project site is located in Century City, a major economic activity area that is designated as a Regional Center in the West Los Angeles Community Plan (Community Plan, page III-4). The proposed project is consistent with the General Plan Framework's goal of targeting Regional Centers for higher-density growth. In addition, the project site is located in a transit corridor and in close proximity to the future Purple Line station, thus, supporting the City's transportation objectives to concentrate development in activity areas.

Table IV.H-1 (Continued)

Comparison of the Project to Applicable Policies of the General Plan Framework Element

Recommendation	Analysis of Proposed Project Consistency
Objective 4: Preserve the existing character of lower density residential areas and maintain pedestrian-oriented environments where appropriate.	**Consistent.** Century City is a geographic district that adjoins surrounding low-density residential uses by defined boundaries. For instance, the jurisdictional boundary between the City of Los Angeles and the City of Beverly Hills forms the east boundary of Century City. The pattern of development associated with Century City is that of high-rise uses juxtaposed with off-site low density residential neighborhoods in both the Cities of Los Angeles and Beverly Hills to the east and west of Century City. It is typical of the existing character of these off-site neighborhoods to experience the adjoining tall buildings rising in the background. The project site is located within the existing boundaries of Century City and would not replace or remove low density uses, or change land use patterns within existing low-density residential neighborhoods. The proposed project is located at the edge of Century City near an existing low-rise, multi-family neighborhood to the west of Moreno Drive in Beverly Hills. This development pattern is similar to the juxtaposition of existing high-rise towers in Century City with off-site residential uses and is consistent with Century City's high-rise pattern. In addition, the proposed project would provide a deep, landscaped setback between the project's residential building and the off-site residential neighborhood. The proposed project would provide pedestrian amenities, including street trees along Moreno Drive. As the proposed project would be consistent with an established development pattern, would not occur within a low-density residential neighborhood, would provide a landscaped setback, and would enhance the pedestrian character of the area, it would be consistent with the General Plan Framework's objective of preserving lower density residential neighborhoods and enhancing the existing pedestrian environment.

[a] *Southern California Associations of Governments, 2008 Regional Transportation Plan, Integrated Growth Forecast, Forecast by Census Tract for 2020, compared to City of Los Angeles, Local Population and Housing Profile for 2009 for census tracts comprising the West Los Angeles Community Plan.*

Source: PCR Services Corporation, 2011.

The location of multi-family housing on the site would conserve existing residential neighborhoods in that it would be located entirely within the boundaries of Century City and would not replace any housing in existing neighborhoods.

The proposed project would be consistent with established land use patterns in the area, in which high-rise uses are located in proximity to off-site, low density residential neighborhoods. The proposed project would provide for the stability and enhancement of multi-family residential neighborhoods as it would occur in an area where sufficient public infrastructure and services are available. The proposed project would enhance the quality of life of the area's residents by creating a residential link between existing residential uses in the south portion of Century City and uses along Santa Monica Boulevard.

The proposed project would be located adjacent to the Santa Monica Transit Parkway and in the vicinity of the proposed Purple Line subway station and would, thus, support transit, consistent with the goals of the Housing and Transportation Chapters. The proposed project would also be consistent with the objectives and policies of the Transportation Chapter of the General Plan in that it would be located in a major, existing economic activity area. As the proposed project would be consistent with applicable objectives and policies of the General Plan Framework, it would have a less than significant impact with respect to consistency with this land use plan.

(b) Do Real Planning

The Planning Commission's "Do Real Planning" includes fourteen points intended to set the City on a course toward sustainability. Many of the fourteen points address procedures for the operation of the City Planning Department or issues isolated to specific settings and types of projects that are different from the proposed project. However, of the fourteen points, several address planning concepts that are relevant to the proposed project. Points of particular note are those that pertain to location of land uses and density (Points 3 and 6), site design/walkability/parking location (Points 1, 2, 9 and 12), improvement of housing stock (Point 5), and green design with abundant landscaping (Points 7 and 8). Point 1, "Demand a Walkable City" has led to the development of a "Walkability Checklist," discussed below. Points of "Do Real Planning" that would be applicable to the project include the following:

- Point 3, "Require Density Around Transit" and Point 6, "Locate Jobs Near Housing," address the location of new development within the City. The project would be supportive of these points as it increases population density in an area that is well served by public transit, including bus rapid transit and the future Century City Purple Line Subway station. The site also has immediate access to employment, services, retail in Century City and the immediate surrounding area.
- Point 5, "Advance Homes for Every Income," addresses the value of up-zoning land to accommodate higher densities and the need to address housing for the poor and middle class as a component of such up-zoning. While the project does not include affordable housing, the project would contribute to the objective of Point 5 in that it would increase housing stock with a variety of unit sizes.
- Point 12, "Identify Smart Parking Requirements," addresses smart parking guidelines intended to avoid parking lots that occupy prime street frontage. The proposed project design would be consistent with this intent in that all parking would be enclosed, and setback behind landscaping and building frontages. With the Automated Parking Option, the floor area and respective building size needed to park the proposed 708 spaces would be decreased.
- Point 2, "Offer Basic Design Standards," and Point 8, "Landscape in Abundance," and Point 9, "Arrest Visual Blight," apply to the appearance of the City. The proposed project, which would be a distinctive landmark building of high-quality architectural design, would be consistent with these points. In addition, the street frontage has been designed to be visually attractive as viewed from the sidewalk level. Some of the project's design features include a project design with articulation and texture to avoid "stucco box" development, the undergrounding of utilities; the avoidance of blank walls, and street-front parking lots; and a substantial landscaping program, with 41 percent of the site in ground level open space.
- Point 7, "Produce Green Buildings," addresses the need to support sustainable development and, in particular, to encourage developers to commit to building LEED certified buildings. The proposed project would be designed to achieve the standards of LEED certification and to comply with the City

of Los Angeles Green Building Ordinance. A sustainability program would be prepared and monitored by a LEED accredited design consultant to provide guidance in project design, construction and operations; and to provide performance monitoring during project operations to reconcile design and energy performance and enhance energy savings.

(c) Walkability Checklist

The project is compared to the policies of the City's Walkability Checklist in **Table IV.H-2**, *Comparison of the Project to the Policies of the Walkability Checklist*, below. As shown in Table IV.H-2, the project would be substantially consistent with checklist policies. The project would improve existing pedestrian conditions along Moreno Drive and Santa Monica Boulevard by landscaping and upgrading the existing street frontage. The project would feature a well-defined building entrance oriented toward and accessible from Santa Monica Boulevard, and create a landmark tower that would contribute to the identity of Century City as a strong, positive component of the City's skyline. Because the project would be consistent with the applicable policies of the Walkability Checklist impacts with respect to these policies would be less than significant.

(d) West Los Angeles Community Plan

Table IV.H-3, *Comparison of the Proposed Project to Applicable Policies of the West Los Angeles Community Plan*, evaluates the consistency of the proposed project with policies of the Community Plan. As shown in Table IV.H-3, the proposed project would be substantially consistent with the Plan's residential and open space objectives and policies. The proposed project would be consistent with commercial objectives to strengthen viable commercial development by enlarging the residential base that would support such uses. New or proposed commercial uses include a net increase of 358,881 square feet of retail/restaurant uses in the nearby Westfield Century City Shopping Center and over 3 million square feet of new office, retail, entertainment, and restaurant uses in the 2000 Avenue of the Stars project. The proximity of a residential population to commercial uses would support and strengthen viable commercial development in the area.

As discussed in Table IV.H-3, the proposed project would support the distinction of Century City as a pedestrian-oriented commercial center and would promote the character of the district though high quality architectural design. The proposed project would be consistent with the open space goal to provide sufficient open space in balance with new development to serve the recreational, environmental, health and safety needs of the community.

As the proposed development would not include a "low-income" component, the proposed project would not directly contribute to attainment of the City's objectives to promote affordable housing. The project would also not directly contribute to the policy to prevent development of all-residential uses on commercial properties. However, the criterion for determining significance with respect to a land use plan emphasizes conflicts with plans adopted for the purpose of avoiding or mitigating an environmental effect, recognizing that an inconsistency with a plan, policy, or regulation does not necessarily equate to a significant impact on the environment. Although the proposed project would not provide affordable housing, this would not result in noncompliance with an established regulation nor result in a significant physical impact as a result of the non-compliance. In addition, the project would be consistent with the high-rise urban character of adjacent and surrounding high-rise office buildings and would not cause a change in the area's character that would discourage the continuation of existing commercial uses. Therefore, the project would not result in a significant environmental impact and would be in substantial compliance with the land use designation, objectives and policies of the West Los Angeles Community Plan.

Table IV.H-2

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
SIDEWALKS	
Objective: Support ease of pedestrian movement and enrich the quality of the public realm by providing appropriate connections and street furnishings in the public right of way.	**Consistent.** The project would upgrade landscaping and street trees, and provide pedestrian lighting along the Santa Monica Boulevard and Moreno Drive frontages, enhancing pedestrian linkages between Beverly Hills and the Century City retail and entertainment uses.
Goals	
Delineate the pedestrian corridor.	**Consistent.** Improved sidewalks and adjacent landscaping would delineate the pedestrian corridor in the vicinity of the project site.
Provide for pedestrian safety and comfort.	**Consistent.** The project would provide for pedestrian safety and comfort through the provision of pedestrian lighting and sidewalk improvements.
Encourage pedestrian travel.	**Consistent.** The project would encourage pedestrian travel by locating a multi-family residential use within walking distance of a broad array of retail, restaurant, entertainment, business offices, and services, as well as proximity to transit in the Santa Monica Boulevard Transit Parkway and the future Purple Line Subway.
Create active environments by supporting a variety of pedestrian activities.	**Consistent.** The project would support pedestrian activity by enhancing the street front with landscaping and direct access from the proposed residential tower.
Create, preserve, and enhance neighborhood identity and "placemaking."	**Consistent.** The neighborhood identity of Century City is that of high-rise clusters, located in broad, landscaped setbacks. The project would support and enhance the existing neighborhood identity and "placemaking" by creating a landmark tower with a high degree of architectural interest within the current backdrop of Century City's towers.
Comply with governmental regulations for all improvements in the public right of way.	**Consistent.** The project would comply with existing regulations for improvements in the public right-of-way.
Implementation Strategy Checklist	
Create a continuous and predominantly straight sidewalk and open space.	**Consistent.** The project would provide continuous sidewalks, landscaping, and landscaped setbacks along the public right-of-way.
Create a buffer between pedestrians and moving vehicles by the use of landscape and street furniture (benches, newspaper racks, pedestrian information kiosks, bicycle racks, bus shelters, and pedestrian lighting).	**Consistent.** The project would provide new landscaping/trees along the pedestrian ways to create a landscaped buffer between the pedestrian ways and the valet and other site activities at the project site.
Provide adequate sidewalk width that accommodates pedestrian flow and activity yet is not wider than necessary.	**Consistent.** The project would provide uniform sidewalks that would accommodate pedestrian flow.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
Utilize street furnishings to create a consistent rhythm (i.e., consistent height of light poles or consistent shade pattern of trees).	**Consistent.** The project would provide uniform street trees and pedestrian lighting to create a consistent rhythm and pattern along the Santa Monica Boulevard and Moreno Drive frontages.
Incorporate closely planted shade-producing street trees. They may be interspersed with existing or proposed palms.	**Consistent.** The project would provide closely planted, shade producing street trees.
Plant parkways with ground cover, low-growing vegetation or permeable materials that accommodate both pedestrian movement and car doors.	**Consistent.** Parkway landscaping would be provided that would accommodate pedestrian movement. However, no parking would be allowed along the project's Santa Monica Boulevard and Moreno Drive frontages and the need for low-profile shrubbery to accommodate car doors would not be necessary.
CROSSWALKS / STREET CROSSINGS	
Objective: Pedestrian safety is the primary concern in designing and managing street crossings. Crossings that are safe, easy to use and well-marked support active, pedestrian-friendly environments and link both sides of the street physically and visually.	**Consistent.** The Moreno Drive/South Santa Monica Boulevard intersection crossing from the project site to the east was installed and signalized with the development of the Santa Monica Boulevard Transit Parkway. The nearest pedestrian route across the Santa Monica Transit Parkway is located at Century Park East, one block to the west of the project site. No pedestrian access across the Transit Parkway is provided at the project site, or would be appropriate due to the complexity of the intersection (several roadways converging and separating in a complex signalized pattern). For further discussion regarding pedestrian safety, refer to Section IV.K, Traffic and Circulation, of this EIR.
Goals	
Appropriately locate street crossings in response to the anticipated traffic flow and convenience of the pedestrian.	**Consistent.** The street crossings at, or in the vicinity of, the project site, are based on recent changes in the alignment of the Santa Monica Boulevard Transit Parkway. The Moreno Drive pedestrian crossing, which leads from the project site to a commercial district in the City of Beverly Hills, is well-marked and signalized. The project would not change or affect the existing, recently constructed configuration of crosswalks.
Provide for pedestrian safety and comfort.	**Consistent.** The project would provide dense landscaping along the sidewalks, along with sidewalk and curb improvements.
Increase the level of caution of pedestrians and motorists.	**Consistent.** The project would limit driveways to two right-turn only driveway on Santa Monica Boulevard and one multi-use driveway on Moreno Drive, both well distance from the intersection. The project would also provide pedestrian lighting to increase security and pedestrian visibility.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
Create a link between the two sides of the street or mark a block's mid-point or end-point.	**Consistent.** The project site is located at the southwest corner of the intersection of Santa Monica Boulevard/Santa Monica Boulevard Transit Parkway and Moreno Drive. In this area, the Santa Monica Boulevard Transit Parkway and a series of access roads parallel Santa Monica Boulevard, with no intervening development. A link across the combined Santa Monica Boulevard and the Transit Parkway is not appropriate at the project site. However, a signalized pedestrian crossing, which links the two sides of Moreno Drive, is currently provided across Moreno Drive at the northeast corner of the project site. The existing linkage would be continued with the development of the project.
Ensure crosswalks are in compliance with Departments of Transportation and Public Works regulations.	**Consistent.** The configuration of the signalized crosswalks across Moreno Drive is consistent with the requirements Departments of Transportation and Public Works.
Implementation Strategy Checklist	
Incorporate such features as white markings, signage, and lighting so that pedestrian crossings are visible to moving vehicles during the day and night.	**Consistent.** The existing signalized crosswalk at Moreno Drive incorporates markings and signalization. Future visibility may be enhanced by new pedestrian lighting on the west side (project site).
Improve visibility for pedestrians in crosswalks by installing curb extensions/bump outs and advance stop bars, and eliminating on-street parking spaces adjacent to the crossing.	**Consistent.** The Santa Monica Boulevard/Moreno Drive rights-of-way and traffic demand would not allow bump-outs. However, no parking would be allowed along the project frontages. Therefore, pedestrians would be visible to drivers approaching the intersection.
Emphasize pedestrian safety and comfort at crosswalks with devices such as pedestrian crossing signals, visible and accessible push buttons for pedestrian actuated signals and dual sidewalk ramps that are directed to each crosswalk.	**Consistent.** The pedestrian crossing at Moreno Drive is improved with pedestrian crossing signals. Dual sidewalk ramps would not be necessary since no crossing of Santa Monica Boulevard in this location is provided. The project would continue the existing access pattern at this location for the reasons described above.
Create the shortest possible crossing distance at pedestrian crossings on wide streets. Devices that decrease the crossing distance may include a mid-street crossing island, an area of refuge between a right-turn lane and through lane, a curb extension/bump out and a minimal curb radius.	**Consistent.** Moreno Drive is a local street in this location, and the street crossing is relatively narrow. No changes in the street or sidewalk configuration would be necessary.
ON-STREET PARKING	
Objective: On-street parking is often desired in residential and commercial areas for its convenient access to street front entrances. Residents, shoppers, and businesses are amenable to limited slowing of traffic as a trade-off for the economic benefits of on-street parking.	**Not Applicable.** No on-street parking is available along the project's street frontages. The established Santa Monica Boulevard and Moreno Drive rights of way and existing traffic demand do not and would not provide space for on-street parking.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
Goals	
Maximize on-street parking.	**Not Applicable.** (See the prior comment.)
Directly serve adjacent street front entrances with on-street parking.	**Not Applicable.** (See the prior comment.)
Create a buffer between pedestrians and the roadway.	**Consistent.** The project frontages along Santa Monica Boulevard and Moreno Drive include notable landscaped setbacks and landscaped parkways.
Comply with applicable governmental regulations for all parking in the public right of way.	**Not Applicable.** No parking is currently provided or would be provided on the project's Moreno Drive and Santa Monica Boulevard street frontages.
Implementation Strategy Checklist	
Provide angled or parallel on-street parking wherever possible.	**Not Applicable.** (See the prior comment.)
Eliminate street parking within pedestrian crossings.	**Not Applicable.** (See the prior comment.)
UTILITIES	
Objective: The disruption of views and visual pollution created by utility lines and equipment should be minimized.	**Consistent.** All utility lines and equipment would be located underground.
Goals	
Locate utilities in areas that preserve the character of the street and neighborhood.	**Consistent.** All utility lines and equipment would be located underground, consistent with the existing character of Santa Monica Boulevard in Century City.
Minimize the impact of utilities on the visual environment.	**Consistent.** All utility lines and equipment would be located underground and would not impact the visual environment.
Minimize the impact of utilities on the pedestrian path of travel.	**Consistent.** All utility lines and equipment would be located underground and would not impact the pedestrian path of travel.
Ensure the location of utilities in the public right of way complies with governmental and utility regulations.	**Consistent.** All utility lines and equipment needed for the project would comply with governmental and utility regulations.
Implementation Strategy Checklist	
Place utilities underground whenever possible.	**Consistent.** All utility lines and equipment would be located underground.
Place utilities in the landscape areas and away from crosswalks or sidewalks.	**Consistent.** All utility lines and equipment would be located underground and, therefore, sidewalks and crosswalks would not be affected.
Buffer equipment with planting in a manner that contributes to the quality of the public streetscape.	**Not Applicable.** All utilities would be located underground and would not require landscape buffers.
Eliminate conflicts between utilities and access to building entrances.	**Not Applicable.** All utilities would be underground and no conflicts between utilities and access to building entrances would occur.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
BUILDING ORIENTATION	
Objective: Use the relationship between building and street to improve neighborhood character and the pedestrian environment.	**Consistent.** The project would improve the relationship between the residential tower and the street by orienting the entrance toward Santa Monica Boulevard. The entrance would be at grade and a broad pedestrian pathway from the entrance to the sidewalk would be provided.
Goals	
Enliven the public realm by siting buildings, so they interact with the sidewalk and the street.	**Consistent.** The project would enliven the public realm by orienting the front of the building toward Santa Monica Boulevard.
Contribute to a sense of human scale.	**Consistent.** The project would contribute to a sense of human scale by orienting the entrance to Santa Monica Boulevard and by providing architectural definition of the building's lower stories. Architectural features that would enhance human scale include a distinct entry level, canopies, and glass cantilevered building element. Building setbacks and ground level landscaping would also contribute to the project's pedestrian level.
Support ease of accessibility to buildings.	**Consistent.** A broad walkway would connect the building entrance and valet drop-off to the public sidewalk.
Implementation Strategy Checklist	
Design grade level entrances from the public right-of-way for pedestrians.	**Consistent.** The project would provide the front building entrance at grade level and oriented toward the public sidewalk.
Create primary entrances for pedestrians that are easily accessible from transit stops, with as direct a path as possible to the transit stop.	**Consistent.** The tower entrance would be oriented toward the public sidewalk, which has direct access to bus rapid transit, and other transit along the Santa Monica Boulevard Transit Parkway.
Make primary entrances to buildings visible from the street and sidewalk.	**Consistent.** The tower entrances would be at grade and visible from the street and sidewalk.
Maintain at least one entrance from the public way at retail establishments with doors unlocked during regular business hours.	Not Applicable. The project does not include retail or other commercial components.
Incorporate transitions from the sidewalk to the front door such as grade separation, landscaping, and/or porches at individual entrances to residences. These methods should not negatively impact the overall street wall.	**Consistent.** A broad, landscaped walkway would provide the transition between the sidewalk and the tower entrance in manner that would not negatively impact the street frontage.
Comply with Americans with Disabilities Act (ADA) guidelines at primary pedestrian entrances. Alternate approaches for persons with mobility limitations (such as a ramp next to the main path to the primary entry) should not be necessary.	**Consistent.** Entrances to the tower and other onsite facilities would comply with all applicable ADA guidelines.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
Incorporate passageways or paseos into mid-block developments, particularly on long blocks, that facilitate pedestrian movement through the depth of the block to the front of the next parallel block. Pedestrians need not walk the circumference of a block in order to access the middle of the next parallel block or alley or parking behind the block.	**Not Applicable.** The project site is located at the northeast corner of a large block. Mid-street paseos and other crossings would not be adaptable to the site.
Activate mid-block passageways or paseos so that they are visually interesting and safe spaces.	**Not Applicable.** The project would not provide mid-block passageways since the inside boundaries of the project site are not located parallel to another street or block.
Provide direct access to building entrances from sidewalks and streets.	**Consistent.** The project would provide direct access to the building entrance from the adjacent public sidewalk.
Locate buildings at the front property line or at the required setback to create a strong street wall. Where additional setback is necessary, that area can be used to create an "outdoor room" adjacent to the street, incorporating seating or water features for example.	**Consistent.** The project would be located in the northwest section of the project site to maximize open space on the south and east interfaces with Beverly Hills High School and the residential uses across Moreno Drive. The relatively wide setbacks would enhance the visibility of the tower from the sidewalk and would be in keeping with broader setbacks typical of Century City.
Use architectural features to provide continuity at the street where openings occur due to driveways or other breaks in the sidewalk and building wall.	**Consistent.** Lower story architectural features, landscaping, decorative pavement along the entrance driveways, and other features would provide visual continuity at the project's driveways.
OFF-STREET PARKING AND DRIVEWAYS	
Objective: The safety of the pedestrian is primary in an environment that must accommodate pedestrians and vehicles.	**Consistent.** The project would be limited to two driveways on Santa Monica Boulevard and one driveway on Moreno Drive. Valet activities would take place at the site's interior. Driveways would feature decorative paving at sidewalk crossings that would enhance pedestrian awareness of the driveway location.
Goals	
Ensure that clear and convenient access for pedestrians is not minimized by vehicular needs.	**Consistent.** The project would ensure that clear and convenient access for pedestrians is not affected by vehicular needs. A broad pedestrian walkway, separated from the driveway entrance, on Santa Monica Boulevard, would ensure pedestrian visibility between the sidewalk and the tower entrance.
Eliminate auto-pedestrian conflicts.	**Consistent.** The project would eliminate auto-pedestrian conflicts by separating pedestrian access to the tower and the driveway entrance, providing pedestrian lighting, and limiting driveways.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
Increase awareness between pedestrians and motorists.	**Consistent.** Decorative driveway pavement and pedestrian lighting would increase awareness between pedestrians and motorists. The signalized crosswalk at Moreno Drive would also increase awareness and right-of-way between pedestrians and motorists.
Maintain the character of a pedestrian friendly street.	**Consistent.** The project would enhance the street frontage with trees and gardens, as well as limit the number of driveway crossings.
Implementation Strategy Checklist	
Maintain continuity of the sidewalk.	**Consistent.** The project would maintain sidewalk continuity by limiting driveway crossings.
Locate parking behind buildings rather than directly exposed to the adjacent major street.	**Consistent.** Parking would be provided both below ground and in a structure (an ancillary, nine story structure within the project site).
Use alleys to access the parking behind the building. If no alley is available, create access to parking from a side street, wherever possible.	**Consistent.** No alley access is available. Access would be limited to two driveways on Santa Monica Boulevard and one driveway on Moreno Drive.
Accommodate vehicle access to and from the site with as few driveways as possible.	**Consistent.** Access would be limited to two driveways on Santa Monica Boulevard and one driveway on Moreno Drive.
Limit the width of each driveway to the minimum required.	**Consistent.** Driveways would be limited to minimum widths permitted for two way traffic.
Incorporate architectural features on parking structure facades that respond to the neighborhood context and that contribute to "placemaking".	**Consistent.** The parking structure would be designed to be compatible with the architectural style of the residential tower. Ground level architectural elements will be carried from the residential building. The facades of the parking structure would be draped with vertical landscaping to create a "green wall" effect.
Limit parking in the front setback of the building to within allowed driveways.	**Consistent.** The only surface parking would consist of temporary parking within the valet area.
Mitigate the impact of parking visible to the street with the use of planting and landscape walls tall enough to screen headlights.	**Consistent.** Parked cars within the proposed subterranean and above-grade structures would not be visible from the street.
Illuminate all parking areas and pedestrian walkways.	**Consistent.** All pedestrian walkways and adjacent sidewalks would be illuminated for way-finding and security.
Reconstruct abandoned driveways as sidewalks.	**Not Applicable.** All former driveways have been demolished and removed.
Reconstruct sub-standard driveways to meet current ADA requirements.	**Not Applicable.** No former or substandard driveways exist on the site.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
ON-SITE LANDSCAPING	
Objective: Contribute to the environment, add beauty, increase pedestrian comfort, add visual relief to the street, and extend the sense of the public right-of-way.	**Consistent.** The sidewalk frontages would be landscaped with street trees and gardens. The deep garden in the southeast sector of the property would add beauty and add visual relief as viewed from the Moreno Drive street and sidewalk, from residential uses to the east of the project site, and from the Beverly Hills High School campus to the south. The views into the project site from public locations would extend the sense of the public right-of-way.
Goals	
Add visual interest.	**Consistent.** Street trees, corner signage and landscaping, decorative driveway surfacing, lawns, and gardens would add visual interest as viewed from surrounding public locations.
Differentiate the public pedestrian zone from the private zone.	**Consistent.** Street trees and other landscaping would differentiate between the public sidewalk and the project interior.
Enhance pedestrian comfort.	**Consistent.** Dense shade trees along the sidewalk frontages would enhance pedestrian comfort.
Create a neighborhood identity and contribute to "placemaking".	**Consistent.** The project would be consistent with the identity of Century City, which is characterized by high-rise buildings located within landscaped setbacks.
Implementation Strategy Checklist	
Provide canopy trees in planting areas in addition to the street trees.	**Consistent.** Canopy trees would be located throughout the project site.
Provide planting that complements pedestrian movement or views.	**Consistent.** A broad, landscaped entrance walkway would complement pedestrian movement and open views of the project from Santa Monica Boulevard.
Provide planting that complements the character of the built environment.	**Consistent.** The project's formal landscaping scheme would complement the character of the Century City's highly urbanized built environment and the formal design of the building.
BUILDING FAÇADE	
Objective: Use the design of visible building facades to create/reinforce neighborhood identity and a richer pedestrian environment.	**Consistent.** The building design is based on a grouping of interrelated building quadrants and sloped lines for roofs, entry canopies and selected building faces (slightly angled facades) to create building articulation and interest. The height and landmark quality of the project's tower would reinforce the identity of Century City as a scenic component of the City's skyline.
Goals	
Incorporate features on the building facade that add visual interest to the environment.	**Consistent.** The angular projections of the tower's entrance area, exterior walls, and roof line would create drama and add visual interest to the environment.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
Create compatibility between buildings, street, and neighborhood through architectural elements that add scale and character.	**Consistent.** The project would be consistent with the scale and character of surrounding high-rise buildings and, through at-grade and lower level features including the design of the entrance area, would create compatibility between the tower and the street.
Provide views beyond the street wall to enhance the public's visual environment.	**Consistent.** Views through various angled projections along the tower's façade would enhance the public's visual environment.
Implementation Strategy Checklist	
Incorporate different textures, colors, materials, and distinctive architectural features that add visual interest.	**Consistent.** The project would incorporate a variety of building planes, including varied roof lines and building materials that would add visual interest.
Add scale and interest to the building facade by articulated massing.	**Consistent.** As viewed from various directions, the building would present various planes, thicknesses, and articulations that would add scale and interest to the tower.
Reinforce the existing facade rhythm along the street with architectural elements.	**Consistent.** The project would be designed to create a façade rhythm as viewed from Santa Monica Boulevard and Moreno Drive, which includes angular lines and projections consistent with the architectural integrity of the structure.
Discourage blank walls. Architectural features, enhanced materials, fenestration, planting, lighting, and signage may contribute to a more pedestrian friendly streetscape.	**Consistent.** The building would incorporate building plane variations, a variety of building materials, architectural lighting, and identification signage which would avoid blank walls and create a pedestrian friendly streetscape.
Include overhead architectural features, such as awnings, canopies, trellises or cornice treatments that provide shade and reduce heat gain.	**Consistent.** An angular projection over the entrance area would provide shade and reduce heat gain, as well as strong architectural interest.
Contribute to neighborhood safety by providing windows at the street that act as "eyes on the street".	**Consistent.** The project would provide windows that overlook the public sidewalks along Santa Monica Boulevard and Moreno Drive.
Devote 75% of facades for ground floor retail uses to pedestrian entrances and pedestrian-level display windows.	**Not Applicable.** The project would not incorporate a retail component.
Utilize the building wall for security between the structure and the street, eliminating the need for fences at the street.	**Not Applicable.** The project includes setbacks along the street frontages.
BUILDING SIGNAGE AND LIGHTING	
Objective: Strengthen the pedestrian experience, neighborhood identity and visual coherence with the use of building signage and lighting.	**Consistent.** The project would provide well-designed, appropriately-scaled signage along Santa Monica Boulevard and Moreno Drive. Building identification signage would be located at street level and visible to pedestrians.
Goals	
Create visual cues for pedestrians.	**Consistent.** Building identification signage would be located at street level and visible to pedestrians.

Table IV.H-2 (Continued)

Comparison of the Project to the Policies of the Walkability Checklist

Objective/Goal/Policy	Project Compatibility
Complement the character of nearby buildings and the street.	**Consistent.** Signage would consist of building identification and would be consistent with signage for a residential building within Century City.
Add human scale to the environment.	**Consistent.** Signage would be located at street-level and, as such would add human scale.
Enhance pedestrian safety and comfort.	**Consistent.** Pedestrian lights and other exterior lighting would enhance nighttime visibility and activity that would enhance pedestrian safety and comfort.
Implementation Strategy Checklist	
Include signage at a height and of a size that is visible to pedestrians, assists in identifying the structure and its use, and facilitates access to the building entrance.	**Consistent.** Signage would be located at street level in an area of the property visible from both Santa Monica Boulevard and Moreno Drive. Way-finding signage or lighting that indicates building or driveway entrances would be sized to be visible at the pedestrian level.
Provide adequate lighting levels to safely light the pedestrian path.	**Consistent.** Pedestrian lights would be provided at building entrances, garden paths, and along adjacent sidewalks to enhance pedestrian security.
Utilize adequate, uniform, and glare-free lighting to avoid uneven light distribution, harsh shadows, and light spillage.	**Consistent.** Lighting would be designed to create an attractive and safe environment, while minimizing glare, deep shadows, and spillover.
Use fixtures that are "dark sky" compliant.	**Consistent.** In accordance with "dark sky" principles, the project would minimize glare and obtrusive light by avoiding fixtures that misdirect light or produce excessive or unnecessary light,

Source: PCR Services Corporation, 2011.

Table IV.H-3

Comparison of the Project to Applicable Policies of the West Los Angeles Community Plan

Policy/Objective	Analysis of Proposed Project Consistency
Objective 1-1: To provide for the preservation of existing housing and for the development of new housing to meet the diverse economic and physical needs of existing residents and projected population of the Plan area to the year 2010.	**Consistent.** The proposed project would not result in the removal of any existing housing. The proposed project would provide 283 new multi-family residential units, thereby contributing to the multi-family housing goals for the West Los Angeles area. As the proposed project would not remove or replace any existing residential units, would result in a net increase in residential units, and would provide residential units for a sector of the diverse West Los Angeles community, the proposed project would be consistent with this policy

Table IV.H-3 (Continued)

Comparison of the Project to the Policies of the West Los Angeles Community Plan

Policy/Objective	Analysis of Proposed Project Consistency
Policy 1-1.1: Protect existing single-family residential neighborhoods from new out-of scale development and other incompatible uses.	**Consistent.** The project's 39-story residential building would be consistent with current development in Century City, including the 44-story twin Century Plaza Towers; the proposed 37-story 1950 Avenue of the Stars office Tower; the 41-story 2055 Avenue of the Stars residential tower; and the approved 39-story Westfield Century City Shopping Center residential building. New high-rise residential buildings in Century City follow an established pattern of high-rise development in Century City. The location of Century City's high-rise towers in close proximity to surrounding single-family neighborhoods is the area's established pattern of development, in which Century City's cluster of towers rise above the surrounding low-rise area. The clustering of high-rise buildings within the boundaries of Century City is both consistent with the existing development pattern of the area and protects off-site residential neighborhoods from encroachment by larger scale development. The proposed project would be located at the northeast edge of Century City, which is not adjacent to single-family neighborhoods, with multi-family-zoned residential neighborhood to the east of Moreno Drive in Beverly Hills. The project site would be developed with a landscaped garden and deep building setback to provide a buffer between the off-site multi-family residential uses and the project's residential tower. Because the proposed project would be consistent with the high-rise character of Century City and would not be located within close proximity to an existing single-family neighborhood, it would not conflict with the Community Plan policy to protect single family neighborhoods in the West Los Angeles Community.
Policy 1-1.3: Provide for adequate multi-family residential development.	**Consistent.** The proposed project would provide 283 new multi-family housing units, thereby implementing the multi-family housing goals of the West Los Angeles Community Plan. The City of Los Angeles currently estimates a total of 38,200 units in 2009 for the census tracts comprising the West Los Angeles Community Plan area. SCAG estimates a total of 48,596 households (residential units) by 2020 for the census tracts comprising the West Los Angeles Community Plan area, for an increase of 10,396 housing units between 2009 and 2020. The project would represent approximately 2.7 percent of the increase in residential units expected between 2009 and 2020. [a]
Objective 1-2: To reduce vehicular trips and congestion by developing new housing in proximity to adequate services and facilities.	**Consistent.** The proposed project would be located within walking distance to a broad range of services and facilities in Century City, including retail, banking, restaurants, offices, hospital, cultural center, and transit services. The proposed project would also be within walking distance of a broad range of services and facilities in the City of Beverly Hills. Furthermore, the project would locate residential uses in close proximity to job opportunities, thereby eliminating or reducing vehicle trips. Therefore, the proposed project would be consistent with this objective.

Table IV.H-3 (Continued)

Comparison of the Project to the Policies of the West Los Angeles Community Plan

Policy/Objective	Analysis of Proposed Project Consistency
Policy 1-2.1: Locate higher residential densities near commercial centers and major bus routes where public service facilities and infrastructure will support this development.	**Consistent.** The proposed project would locate high-density residential uses within an existing high density commercial center, which is served by existing transit, utility, street, and highway infrastructure. Shuttle buses in Century City and primary bus services in the adjacent Santa Monica Boulevard Transit Parkway, including bus rapid transit and Metro's proposed Purple Line Subway would be available to serve the project site. Therefore, the proposed project would be consistent with this policy.
Objective 1-3: Provide for adequate multi-family residential development.	**Consistent.** The proposed project would result in the development of 283 multi-family dwelling units, which would contribute to the community's multi-family housing supply. The project would represent approximately 2.7 percent of the increase in residential units expected in the West Los Angeles Community Plan area between 2009 and 2020 (see Policy 1-1.3, above).[a]
Policy 1-3.1: Require architectural compatibility and adequate landscaping for new multi-family residential development to protect the character and scale of existing neighborhoods	**Consistent.** The location of the project would be consistent with the land uses, scale, and built form of the surrounding area and existing neighborhood. The project would be located within a developed urban area and in close proximity to office, commercial, retail, restaurant, and entertainment uses, which are well served by public transit. The project's site plan, architecture and landscaping would protect and enhance the character of the existing neighborhood. The minimal footprint design of the project's residential building would allow the project to provide more open space on the project site, including approximately 43,141 square feet of ground level open space. The project would also provide open space on site as buffers between the project's buildings and the adjacent Beverly Hills High School to the south and multifamily residential uses to the east. The project's high rise residential building would have a narrow floorplate, and the Applicant would construct the residential building on the northern-most portion of the site along Santa Monica Boulevard and away from uses to the south and southeast. The ancillary building with parking and residential amenities would be located at the west side of the tower, distant from multifamily residential uses. Between project buildings and adjacent uses, the project would provide approximately 43,141 square feet of ground level open space area, thus buffering the high-rise residential building from the lower density uses to the south and east. The proposed residential building would create visual interest along Santa Monica Boulevard through a design that breaks away from the traditional corporate high-rise vernacular. The building design would be based on a grouping of interrelated building quadrants, and would include sloped lines for roofs, entry canopies, and selected building faces, to create slightly angled facades. The residential building would also include a 40-foot entry lobby visible from and accessible to the sidewalk, thus meeting the goal of providing a pedestrian-oriented building design.

Table IV.H-3 (Continued)

Comparison of the Project to the Policies of the West Los Angeles Community Plan

Policy/Objective	Analysis of Proposed Project Consistency
Objective 1-4: To promote adequate and affordable housing and increase its accessibility to more segments of the population, especially students and senior citizens.	**Partially Consistent.** While the proposed project would increase the area's available housing supply and would provide a range of unit sizes, the proposed residences would not meet the City's definition of low and moderate-income units. However, an increase in housing supply would incrementally reduce demand and may facilitate the affordability of units in other locations. The project would not require the removal of existing housing stock, affordable or otherwise.
Objective 2-1: To conserve and strengthen viable commercial development and to provide additional opportunities for new commercial development and services within existing commercial areas.	**Consistent.** The project would increase the residential base that supports the existing business community. In addition, residential growth in this area would potentially stimulate new commercial development in the surrounding commercial district.
Policy 2-1.1: New commercial uses shall be located in existing established commercial areas or shopping centers.	**Consistent.** The intent of this policy is to avoid commercial development in non-commercial areas. Although the project site is located in an established commercial area (C2), it would not preclude the development of other commercial properties in the surrounding commercial zones or impede the objectives of the Community Plan.
Policy 2-1.2: Protect commercially planned/zoned areas from encroachment by residential only development.	**Partially Consistent.** While Century City is zoned for commercial use, the zoning designation was planned to accommodate a range of commercial and residential uses. The proposed project would be a residential-only development within an existing commercial zone and, thus, would not directly provide a residential/commercial mix of uses. However, the high-rise, urban character of the project would be consistent with the character of surrounding high-rise office buildings. The consistency in urban character and compatibility among high-rise urban uses would not change the character of Century City to an area more suitable to residential development than commercial development or cause the transition of surrounding commercial uses to residential uses. Further, the project is located on a relatively small site that is part of a larger development milieu (Century City and the surrounding area) expected to contain a mix of individual developments, some of which at the individual parcel level might be either commercial or residential only. New developments in the area that would provide a mix of residential and commercial uses include the Westfield Century City, located approximately two blocks to the west of the project site. The project would not impede the continued commercial use of adjacent properties or cause the transition of adjacent or nearby commercial properties from commercial to residential uses.
Policy 2-1.3: Ensure that viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.	**Consistent.** The proposed project's introduction of new residential uses to Century City would support and strengthen viable commercial development in the area, including proposed retail/restaurant uses associated with the existing and renovated Westfield Century City Shopping Center and new office, retail, entertainment, and restaurant uses associated with 2000 Avenue of the Stars project. Therefore, the proposed project would support the viability of existing businesses that currently support the needs of local residents and which are compatible with the character of Century City.

Table IV.H-3 (Continued)

Comparison of the Project to the Policies of the West Los Angeles Community Plan

Policy/Objective	Analysis of Proposed Project Consistency
Objective 2-2: To promote distinctive commercial districts and pedestrian-oriented areas.	**Consistent.** Century City was developed as a distinctive commercial district, with high-quality architecture, broad landscaped setbacks, a mix of uses and services; and pedestrian linkages and paths. The proposed project would promote the character of the district though high quality architectural design and specific pedestrian amenities, including landscaping along Santa Monica Boulevard and Moreno Drive. As the project's new residential population, the building's architectural design, and ground-level amenities would enhance the character of the existing district and support pedestrian activity, the proposed project would be consistent with this policy.
Policy 2-2.1: Encourage pedestrian-oriented design in designated areas and in new development.	**Consistent.** The proposed project would incorporate specific pedestrian amenities, including deep landscaping along Santa Monica Boulevard and Moreno Drive; improved sidewalks, and pedestrian lighting and, thus, would be consistent with the intent of this policy to improve pedestrian conditions.
Objective 2-3: To enhance the appearance of commercial districts.	**Consistent.** The proposed project would enhance the appearance of the existing commercial district by providing landscaping, street trees along Santa Monica Boulevard and Moreno Drive, and a deep landscaped garden along Moreno Drive. These amenities, as well as the landmark architectural quality of the proposed residential tower would improve the visual quality of the surrounding area and Century City.
Goal 5: To provide sufficient open space in balance with new development to serve the recreational, environmental, health and safety needs of the community and to protect environmental and aesthetic resources.	**Consistent**. The project would include a considerable amount of active open space, a landscaped recreational roof deck, and an indoor recreational area with such features as pools, courts, and gym facilities to serve project residents, and limit potential impacts on existing-off site open space resources. Further, the Applicant would meet the City's requirements for the dedication of park land or provision of in lieu fees (Quimby fees) for parks and recreational uses to support City goals regarding park lands (see Chapter IV.J.5, *Parks and Recreation*, of this Draft EIR). As such, the proposed project would be consistent with this goal.

[a] *City of Los Angeles, Local Population and Housing Profile for 2009 for census tracts comprising the West Los Angeles Community Plan compared to the Southern California Associations of Governments, 2008 Regional Transportation Plan, Integrated Growth Forecast, Forecast by Census Tract for 2020 for the same census tracts. (Note: The Community Plan estimates approximately 40,309 households by 2010; however, current City "Local Population and Housing Profile for 2009" is more current and may be more accurate. Under the projection of 40,309 households by 2010 contained in the Community Plan, the project would represent approximately 3.4 percent of SCAG's estimated increase in households to 2020.)*

Source: PCR Services Corporation, 2011

(e) Century City North Specific Plan

Table IV.H-4, *Comparison of the project to the applicable policies of Century City North Specific Plan*, evaluates the consistency of the proposed project with the CCNSP. The purpose of the CCNSP is to assure orderly development and to provide street capacity and other public facilities adequate for the intensity and design of development in Century City by establishing phases for construction within the specific plan area.

The CCNSP incorporates two phases of development. Pursuant to City of Los Angeles Case #CF 98-0672, all Phase I improvements have been completed and the CCNSP is now acting in its second phase. The CCNSP's second phase of development began when building permits had been issued for proposed projects generating 15,225.606 Trips, and when all public improvements set forth in the CCNSP Ordinance were completed. The use of the Trip cap is the mechanism by which the CCNSP controls overall project density in a manner that is consistent with the objectives of the Century City mission as a regional center, and consistent with the planned infrastructure for accommodating growth in Century City.

The pertinent provisions of the CCNSP in regard to the project's land use impacts are addressed in Sections 3.C.1 and 3.C.3. Section 3.C.1 provides guidelines pertaining to design compatibility, pedestrian provisions, architectural screening of mechanical equipment and adequate provision for traffic and utility infrastructure facilities. As discussed in Table IV.H-4, the proposed project would be consistent with these provisions by providing a project which is compatible with surrounding uses, which enhances pedestrian linkages, which provides appropriate architectural screening and which meets the requirements regarding traffic and utility related impacts. (For further discussion see Sections IV.K, *Transportation and Circulation*, and IV.L, *Utilities and Service Systems*.)

Based on the City Planning Department's January 1, 2010 Trip Allocation Chart, 2,143.4616 Replacement CATGP Trips are available on the Project site. Pursuant to Section 2 of the CCNSP, which defines CATGP, each residential unit constructed requires 7.55 CATGP Trips. The project would be constructing 283 residential units and, therefore, would require 2,136.65 Trips. Since the project site currently has 2,143.4616 Replacement Trips, there are sufficient Trips on site to construct the project.

The project site is located within the CCNSP's Buffer Area, which provides for a floor area ratio (FAR) of 4.5 to 1. The project is being constructed with a FAR of 4.5:1 after the zoning administrator adjustment to permit buildable, or FAR, square footage to be based on gross lot area, rather than net lot area. Multiplying the project's gross lot area of 104,350 by a FAR of 4.5:1 results in a total of 469,575 FAR square feet, which is the proposed size of the residential building and ancillary amenities.

Table IV.H-4

Comparison of the Proposed Project to Applicable Policies of the Century City North Specific Plan

Policy	Analysis of Proposed Project Consistency
Section 3.C.1.a: The Project conforms to all of the provisions of this Specific Plan, the West Los Angeles Community Plan and all other applicable provisions of the General Plan.	**Consistent**. As demonstrated throughout the analysis herein, the project would be substantially consistent with applicable provisions within the CCNSP, the West Los Angeles Community Plan, and the General Plan.
Section 3.C.1.b: The proposed project has been designed in a way to reasonably assure that it will not cast a shadow for more than two hours, between 8 A.M. and 8 P.M. upon any detached single-family dwelling located outside the CCNSP area.	**Consistent.** The project would not cast a shadow for more than two hours on any single-family home located in a single-family neighborhood or a single-family zoned area outside of the Specific Plan area. There would be shading of more than two hours on one single-family unit located to the east of the project site in Beverly Hills. However, the shading would occur at only one isolated location, where the unit is a non-consistent use within a multi-family residential zone, otherwise developed with multi-family housing. The impact would also occur in the City of Beverly Hills, which does not apply the Specific Plan's shade/shadow standard to its own project for the purpose of evaluating Land Use or shade/shadow impacts. The shading impact on the one unit would not constitute a significant environmental impact based on the City's CEQA Thresholds Guide thresholds of significance, and therefore, would not have substantial shading effects. Therefore, the proposed project would be substantially consistent with this CCNSP provision.
Section 3.C.1.c: Sufficient provisions have been made, if necessary, to assure the installation of a continuous Pedestrian Corridor in accordance with the provisions of Section 10 of this Ordinance and as shown on the Map.	**Not Applicable.** The proposed project is not located in the area designated for Pedestrian Corridor under the CCNSP.
Section 3.C.1.d: Sufficient provisions have been made, if necessary, to assure the installation of Pedestrian Crossings in accordance with the provisions of CCNSP Section 10 and as shown on the Map.	**Not Applicable.** Pedestrian crossings shown in the CCNSP are not located in the project site vicinity.
Section 3.C.1.e: The proposed project has been designed in a manner which adequately screens ventilation, heating and air conditioning ducts, tubes, equipment and other related appurtenances from the view of pedestrians, motorists and occupants of adjacent buildings.	**Consistent.** The project is designed so that all ventilation, heating and air conditioning ducts, tubes, and other such mechanical equipment would be screened from the line of sight of pedestrians, motorists, and occupants of adjacent buildings.
Section 3.C.1.f: The facade of the parking building has been designed to be compatible in architectural character with its principal building and with adjacent existing office, commercial or residential buildings.	**Consistent.** The parking structure would be designed to be compatible with the architectural style of the residential tower. Ground level architectural elements/treatments would be carried from the residential building. The facades of the parking structure would be draped with vertical landscaping to create a "green wall" effect.
Section 3.C.1.g: Consideration has been given by the City Planning Commission to impacts generated by the proposed project on the vehicular circulation system within the Specific Plan Area and on the sections of Pico, Olympic and Santa Monica Boulevards between one mile	**Consistent.** The EIR for the proposed project includes a comprehensive traffic study, conducted under the direction of the City of Los Angeles Department of Transportation (LADOT). The traffic analysis evaluates proposed project impacts on the local and regional

Table IV.H-4 (Continued)

Comparison of the Proposed Project to Applicable Policies of the Century City North Specific Plan

Policy	Analysis of Proposed Project Consistency
easterly and one mile westerly of the boundaries of the Specific Plan Area, including specifically the impacts at those intersections serving the Specific Plan Area at Pico, Olympic and Santa Monica Boulevards, and that mitigation measures, if any, were given due consideration. Such consideration of impacts and mitigation measures shall include, but not be limited to, forecasts of potential traffic from: (1) all proposed projects within the Specific Plan Area and the area governed by the Century City South Specific Plan for which building permits have been issued, but which have not yet been constructed and (2) all allowable future development permitted under the densities and uses set forth for said areas. These forecasts shall be based on the Trip generation factors contained in the definition of CATGP. Said consideration of impacts and mitigation measures shall be made in writing or reduced to writing and shall be a part of the proposed project Permit file.	roadway network (refer to Section IV.K, *Transportation and Circulation*). As concluded in the traffic analysis, no significant impacts relative to Pico, Olympic, and Santa Monica Boulevards would occur as a result of the proposed project. As such, the proposed project would comply with this CCNSP requirement.
Section 3.C.1.h: Adequate sewers and similar public utilities, facilities and services, other than those considered pursuant to CCNSP Section 3.C.1.g, exist or will exist to service the intensity and design of the proposed project and other development in the CCNSP Area.	**Consistent.** As discussed in Section IV.J, *Public Services*, of this Draft EIR, with the implementation of proposed mitigation measures, the proposed project would have a less than significant impact with respect to fire and police protection services, schools, libraries and public parks. As discussed in Section IV.L, *Utilities*, the proposed project would have a less than significant impact with respect to sewer and water demand, with the implementation of project design features and mitigation measures. Impacts with respect to solid waste were determined to be less than significant, as discussed in the Initial Study, Appendix A of this Draft EIR.
Section 3.C.1.i: Sufficient provisions have been made to assure the installation of any on-site or off-site improvements deemed necessary by the City Engineer to accommodate any cumulative impacts generated by the proposed project on existing sewers or other similar public utilities, facilities and services, other than those considered pursuant to CCNSP Section 3.C.1.g.	**Consistent.** Adequate capacity exists in the water and wastewater conveyance system to serve the proposed project. If necessary, the construction of the proposed project would include all necessary on- and off-site sewer and water pipe improvements and connections to adequately link the proposed project to the City's existing systems. The design of the connections would be developed by a registered engineer and reviewed by the Los Angeles Department of Public Works (LADPW). LADOT will review any construction or excavation in a public right-of-way. Fire flows are currently adequate and improvements are anticipated in the near future. With adherence to the requirements of LADPW and LADOT, the proposed project would comply with this CCNSP requirement.

PCR Services Corporation, 2011.

(f) Greening of Century City Pedestrian Connectivity Plan

Table IV.H-5, *Comparison of the Project to Applicable Policies of the Greening of Century City Pedestrian Connectivity Plan*, evaluates the consistency of the project with the Connectivity Plan. As shown in Table IV.H-5, the proposed project would be consistent with the five principles of the Plan. In accordance with Principle 1, the project would create a better pedestrian environment and experience for Century City through the provision of streetscape and street trees along Santa Monica Boulevard, pedestrian lighting, and improved sidewalks. This area would connect to public walkways and sidewalks throughout Century City and provide connectivity to Beverly Hills. The proposed project would provide street-level access for building residents and front door valet services oriented toward Santa Monica Boulevard. This orientation would encourage pedestrian activity between the project site and nearby commercial uses along Santa Monica Boulevard and other areas of Century City and, as such, improve street activity. Landscaping along the sidewalks and within the site would buffer valet activities from the public sidewalks.

The proposed project would be consistent with Principles 2 and 3 to immediately support transit and to enhance connectivity between pedestrians and transit in that it would introduce high density housing to an area currently served by bus rapid transit and other transit services in the adjacent Santa Monica Boulevard Transit Way (including the future Purple Line Subway route) and would enhance public landscape and streetscape. The proximity of high density residential uses to existing transit immediately supports transit use, including the potential for daily commuting between Century City and downtown Los Angeles and other areas of the City or region. The proposed project would be consistent with Principles 4 and 5 to develop an updated identity and more sustainable Century City through the coordination of its street lighting design, landscaping, and street tree plans with the program set forth in the Greening of Century City Pedestrian Connectivity Plan, and by incorporating sustainable strategies, including LEED green building techniques and other sustainability features.

Some of the project's key design features that would contribute to energy efficiencies include landscaped open space to avoid heat field affect and to provide site shading, and the use of glass/window areas for

ventilation and daylight accessibility. The project's proposed Automated Parking Option, if implemented, would reduce air quality impacts, reduce energy consumption, and reduce project construction impacts from those of the Conventional Parking Option. Other building features would include such items as storm water retention; installation of heating, ventilation, and air conditioning (HVAC) systems that utilize ozone-friendly refrigerants; use of materials and finishes that emit low quantities of volatile organic compounds (VOCs); use of high efficiency fixtures and appliances; and recycling of solid wastes. The project would also be designed to comply with the City of Los Angeles Green Building Ordinance. Based on the analysis presented in Table IV.H-5, the proposed project would be consistent with the applicable policies of the Greening of Century City Pedestrian Connectivity Plan. Therefore, land use impacts relative to the Greening of Century City Pedestrian Connectivity Plan would be less than significant.

Table IV.H-5

Comparison of the Project to Applicable Policies of the Greening of Century City Pedestrian Connectivity Plan

Principal	Proposed Project Comparison
1. Create a better pedestrian environment and experience for Century City.	
1.1 Improve street level pedestrian connectivity and activity.	**Consistent.** The proposed project would enhance landscaping and public sidewalks along Santa Monica Boulevard and Moreno Drive, enhancing connectivity and between Century City and Beverly Hills.
1.2 Provide new, enhanced streetscape elements.	**Consistent.** Landscaping and streetscape would be provided along the Santa Monica Boulevard and Moreno Drive sidewalks. Street trees and other landscaping would buffer and visually screen valet activities from the public sidewalks.
1.3 Incorporate existing street-oriented programs and create new street-oriented activity elements.	**Consistent.** The proposed project would provide street-level access for building residents and front door valet services oriented toward Santa Monica Boulevard. This orientation would encourage pedestrian activity between the project site and nearby commercial uses along Santa Monica Boulevard and other areas of Century City and, as such, improve street activity.
1.4 Complete the Specific Plan Pedestrian Corridor in addition to activating and further developing streetscapes throughout Century City.	**Consistent.** The project site is not located in the Specific Plan Pedestrian Corridor area. However, the project would enhance pedestrian ways for those walking past the project site for activity along the Specific Plan Pedestrian Corridor.
2. Enhance connectivity between pedestrians and transit.	
2.4 Better utilize public transit immediately	**Consistent.** The proposed project would introduce high density housing to an area currently served by bus rapid transit and is located near existing transit stops along the Santa Monica Boulevard Transit Way. The proximity of high density residential uses to existing transit supports transit use, including the potential for daily commuting between Century City and downtown Los Angeles and other areas of the City or region.
3. Create a more beautiful public realm within Century City.	
3.1 Continue existing strolling gardens on Santa Monica Boulevard into a strolling loop and connect pedestrian paths, gardens, and open spaces in and around Century City.	**Consistent.** The proposed project would improve sidewalks, landscaping, and pedestrian amenities (such as pedestrian lighting) along Santa Monica Boulevard, and connectivity to all walkways throughout Century City, as well as connectivity between Century City and the City of Beverly Hills.
3.3 Create a program of beautiful new public landscapes.	**Consistent.** The project would provide a uniform pattern of street trees and landscaping along adjacent public sidewalks. The landscaped setback along Moreno Drive would feature a variety of landscaped gardens visible from the public sidewalk.

Table IV.H-5 (Continued)

Comparison of the Project to Applicable Policies of the Greening of Century City Pedestrian Connectivity Plan

Principal	Proposed Project Comparison
4. Develop an updated identity for what the 21st Century City can be.	
4.1 Create an updated identity for Century City while respecting the legacy of the original Century City design with unified lighting, landscape, and street furnishings that reflect 21st Century improvements in technology, sustainability, and lifestyle.	**Consistent**. The proposed project would coordinate its street lighting design, landscaping, and street tree plans with the program set forth in the Greening of Century City and Pedestrian Connectivity Plan.
5. Develop a more sustainable Century City	
5.1 Incorporate sustainable strategies into all aspects of Century City design: planting, lighting, water management, drainage, solar access, alternative energy strategies, art, and more. Encourage green building practices in new and renovated construction.	**Consistent.** The proposed project would be designed to achieve the standards of Leadership in Energy and Environmental Design (LEED) certification through the incorporation of green building techniques and other sustainability features, extensive landscaping to reduce "heat island" effects; the use of heating, ventilation, and air conditioning systems that utilize ozone-friendly refrigerants; the use of materials and finishes that emit low quantities of volatile organic compounds (VOCs); placement and orientation of the buildings to maximize solar control; the use of high-performance glazing and overhangs on the sides of the buildings; and landscaping that provides maximum foliage during the summer months and sun infiltration during the winter months. Water conservation would be maximized through the use of water efficient fixtures and a drip irrigation system.
5.3 Evaluate building envelope for areas suitable for new open space and active street frontage.	**Consistent.** The project design allow a substantial portion of the project site to be placed in landscaped open space uses, including new landscaping along the street frontages and a large open space area on the southeast part of the project site, opening towards Beverly Hills commercial and residential areas.

Source: PCR Services Corporation, 2011.

(g) City of Los Angeles Municipal Code

Table IV.H-6, *Comparison of the Project to Applicable Land Use Regulations of the City of Los Angeles Planning and Zoning Code*, evaluates the consistency of the proposed project with applicable policies of the zoning code. The zoning for the project site and it's vicinity in Century City and adjacent Beverly Hills areas is shown in Figure IV.H-4, *Zoning Map,* on page IV.H.14. For the reasons discussed in Table IV.H-6, the project would be consistent with the provisions of the Los Angeles Municipal Code. The proposed residential development is a permitted use in the underlying C2 zone, which allows multi-family development consistent with the R4 zone. The project is consistent with required front, side, and rear yard setbacks for residential uses in the C2 zone, providing considerably more setback area than required at most of the project locations. The project would be consistent with LAMC Sec. 12.21 G.2 regarding open space for

Table IV.H-6

Comparison of the Project to Applicable Land Use Regulations of the City of Los Angeles Planning and Zoning Code

Code Section	Code Requirement	Analysis of Proposed Project Consistency
Sec. 12.14.A.1.a(1) (Permitted Uses in C2 Zone)	Any use permitted in the C1.5 Limited Commercial Zone (the C1.5 zone permits any use consistent with the requirements of the R4 or multi-family Zone.	**Consistent.** The project would be developed according to the requirements of the R4 zone, as permitted in the existing C2 zone.
12.14. C.1 (Front yard setback in C2 zone)	Not required.	**Consistent:** The project would not be required to provide a front yard setback. However, the building setback provided would be a minimum of 30 feet along Santa Monica Boulevard and 50 feet over much of the building frontage.
Sec. 12.14. C.2 (Side and Rear Yard Setbacks in C2 Zone)	Pursuant to the R4 Zone requirements which are applicable to residential projects in the C2 Zone, the project site would be required to have setbacks of 16 feet for the side yards and 20 feet for the rear yard.	**Consistent.** The project site would have side and rear yard setbacks that meet and exceed the required standards. The side yard setback along the western edge of the project site would be 16 feet. The nearest building component to the eastern edge of the east side of the project along Moreno Drive would be 16 feet. However, the ground level building faces and the taller residential tower wall facing Moreno Drive would be more in the range of 35 to 50 feet from the east property line. The rear yard setback from the ancillary building would be about 25 feet.
Sec. 12.11.C.4 (R4 Zone Area Requirements)	The minimum lot area per dwelling unit shall be 400 square feet.	**Consistent (with an adjustment under LAMC Sec. 12.28.A).** The requested adjustment would allow an additional 23 dwelling units to be constructed by the project, above the 260 units otherwise permitted based on a requirement of 400 square foot per dwelling unit (LAMC Sec. 12.11.C4). The additional dwelling units allowed would be consistent with the development anticipated in the CCNSP and would be compatible with the density of uses in the project area. Furthermore the project site would have sufficient CATGP Trips to construct all 283 dwelling units, consistent with the CCNSP. The resulting development would fall well below the project's 4.5:1 FAR and would provide a housing density that is consistent with other policies and regulations as noted above and below.

Table IV.H-6 (Continued)

Comparison of the Project to Applicable Land Use Regulations of the City of Los Angeles Planning and Zoning Code

Code Section	Code Requirement	Analysis of Proposed Project Consistency
12.21 A.4 (a)	For Dwelling Units—Off -street automobile parking shall be provided at 1 space for each dwelling unit containing less than three habitable rooms; 1.5 spaces for each dwelling units containing three habitable rooms; and 2 spaces for each dwelling unit containing more than three habitable rooms.	**Consistent.** The proposed project would provide 2.5 parking spaces per dwelling unit (2.0 resident parking spaces and 0.5 guest parking space per dwelling unit), or 708 parking spaces for resident and guest use. Thus, the project is consistent with this code section.
Sec. 12.21.2.B.1 (Height of Buildings or Structures in Century City)	No height limit is established for Height District 2.	**Consistent** As no height limit is established for properties within Height District No. 2, which includes the project site, the proposed residential building height would be consistent with this provision.
12.21.2 B.3	The total floor area contained in all the main building on a lot in Height District No. 2 shall not exceed six times the buildable area of said lot.	**Consistent.** The project's FAR of 4.5:1 would be within this limit, and thus consistent with this code section.
Sec. 12.21 G.2 (Usable Open Space)	New construction shall have 100 square feet of usable open space for each unit having less than three habitable rooms; 125 square feet of usable open space for each unit having three habitable rooms; and 175 square feet of usable open space for each unit having more than three habitable rooms.	**Consistent**. Assuming the maximum unit size (more than three habitable rooms), the proposed project would require 175 square feet of usable open space for each residential unit. Therefore, a total of approximately 49,525 square feet of usable open space would be required (283 units x 175 square feet). The project would provide approximately 112,352 square feet of usable open space with the (112,746 square feet with the Automated Parking Option), including 82,052 square feet of common open space. Because the usable open space would be greater than the code requirement, the proposed project would be consistent with this code section.
Sec. 12.21.G.2(a)(3) (Landscaped Common Open Space)	A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees pursuant to specified tree planting requirements.	**Consistent:** Approximately 45 percent of the total outdoor common open space (70,720 square feet) would be planted with ground cover, shrubs or trees, for a total of approximately 31,736 square feet of planted open space. Because the project's planted open space would be greater than the code requirement of 25 percent, the proposed project would be consistent with the code section.

PCR Services Corporation, 2011.

residential uses, providing approximately 112,746 square feet of usable open space, including 82,052 square feet of common open space, and 43,141 square feet of ground level landscaped area.

Proposed approvals for the project, as listed under Chapter II.G, *Necessary Approvals*, in this EIR (and as Project Design Features, above) include adjustments to calculate the project's buildable area on gross lot area and permit the construction of 283 dwelling units, a slight increase in the permitted dwelling unit density pursuant to LAMC Section 12.28.A (*Adjustments and Slight Modifications*). These adjustments are minor variations that would have a less than significant land use impact.

The requested adjustment would allow 283 residential units to be constructed on site, an increase of 23 units above the 260 units otherwise permitted based on a requirement of 400 square foot per dwelling unit (LAMC Sec. 12.11.C4). The additional dwelling units allowed would be consistent with the development anticipated in the CCNSP and would be compatible with the density of uses in the project area. Furthermore the project site would have sufficient CATGP Trips to construct all 283 dwelling units, consistent with the CCNSP.

The second requested adjustment would allow the project's buildable area to be based on gross lot area. Based on the project's proposed FAR of 4.5:1, and gross lot area of 104,350, the project would be permitted a total FAR square footage of 469,575. This adjustment would have a less than significant land use impact. The project would still be required to provide the same setbacks required under the LAMC's zoning, and the project would provide much greater setbacks than required in many portions of the project site. Since the project design would minimize the footprint of the residential building, the project would also provide a much greater square footage of open space than otherwise required under the LAMC (see Figure II-3, *Conceptual Site Plan*, in this EIR). Thus, no significant land use impacts would be generated.

The project is also requesting Project Permit Compliance Review under LAMC Section 11.5.7.C, including Site Plan Review required for all projects which create an increase of 50 or more dwelling units. As there are no maximum heights associated with the C2-2 Zone, the project's 460-foot height would be consistent with the height limit.

(h) Southern California Association of Governments 2008 Regional Transportation Plan and Compass Blueprint Growth Vision

SCAG's 2008 Regional Transportation Plan (RTP) and Compass Blueprint incorporate several goals and policies that are applicable to the proposed project. These SCAG policies are discussed below under (i) Regional Transportation Plan and (ii) Compass Blueprint Growth Vision. **Table IV.H-7**, *Consistency of the Project with Applicable Policies of the 2008 Regional Transportation Plan and Compass Blueprint*, below, provides a detailed analysis of the proposed project's consistency with applicable RTP and Compass Blueprint policies in a side-by-side comparison.

(i) Regional Transportation Plan

Based on the analysis presented in Table IV.H-7, the proposed project would be consistent with applicable RTP goals and policies. The proposed project would be located near the Santa Monica Transit Parkway, a transit corridor that provides bus rapid transit, and is located in the vicinity the future subway station for the Purple Line Subway, thus supporting the region's transportation investment. As shown in Table IV.H-7, the

Table IV.H-7

Consistency of the Project with Applicable Policies of the 2008 Regional Transportation Plan and Compass Blueprint

Policy	Analysis of Proposed Project Consistency
2008 Regional Transportation Plan Goals	
Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** The location of proposed development within a major transportation corridor (Santa Monica Boulevard Transit Parkway) which is also served by bus rapid transit, other transit lines, and Metro's future Purple Line Subway would maximize mobility and the accessibility to the project site.
Ensure travel safety and reliability for all people and goods in the region.	**Consistent.** The project is designed to minimize pedestrian/vehicle conflicts associated with vehicles entering and exiting the project site by providing only one point of access on Santa Monica Boulevard. Sidewalks along Santa Monica Boulevard would be improved to enhance pedestrian access to Avenue of the Stars (two blocks to the west) and existing transit stops in that location. The Avenue of the Stars/Santa Monica Boulevard intersection also provides pedestrian access to the westbound transit stops/stations located at the north side of the Santa Monica Boulevard Transit Parkway.
Preserve and ensure a sustainable regional transportation system.	**Consistent.** The proximity of the project to alternative transit modes in the Santa Monica Boulevard Transit Parkway, as well as multiple bus lines and shuttle buses serving Century City would support the region's transportation investment and the sustainability of the regional transportation system.
Maximize the productivity of our transportation system.	**Consistent.** The project would locate a high-density residential use in an area served by a range of existing local and regional bus lines, including Metro's bus rapid transit and the future Purple Line Subway. The proximity of residential uses to the transit systems would maximize the productivity of the transportation system and, as such, would be consistent with this goal.
Protect the environment, improve air quality and promote energy efficiency.	**Consistent.** The project's operations would result in a less than significant impact with regard to air quality. Nonetheless, the project would implement project design features and mitigation measures to reduce air quality impacts, including the incorporation of energy-saving LEED features (see Chapter IV.B, *Air Quality*, of this Draft EIR). A short-term significant impact during construction would include mitigation measures to reduce emissions to the extent feasible.
Encourage land use and growth patterns that complement our transportation investments.	**Consistent.** The project would intensify development adjacent to the Santa Monica Boulevard Transit Parkway and served by the bus rapid transit, other transit providers, and the future Purple Line Subway. Growth in potential ridership in proximity to these existing systems would support the public's transportation investments.

Table IV.H-7 (Continued)

Consistency of the Project with Applicable Policies of the 2008 Regional Transportation Plan and Compass Blueprint

Policy	Analysis of Proposed Project Consistency
Compass Blueprint	
Principle 1: Improve mobility for all residents: ▪ Encourage transportation investments and land use decisions that are mutually supportive. ▪ Locate new housing near existing jobs and new jobs near existing housing. ▪ Encourage transit-oriented development. ▪ Promote a variety of travel choices.	**Consistent.** The project represents a high density (R4) residential use that would intensify development adjacent to the Santa Monica Boulevard Transit Parkway, bus rapid transit, other transit lines, and the future Purple Line Subway in an area (Century City and West Los Angeles) characterized as high-employment. As such, the project would improve mobility options for the project's future residents.
Principle 2: Foster livability in all communities ▪ Promote infill development and redevelopment to revitalize existing communities. ▪ Promote developments, which provide a mix of uses. ▪ Promote "people scaled," walkable communities. Support the preservation of stable, single-family neighborhoods.	**Consistent.** The project would provide 283 residential units in the Century City community, which would foster the livability of Century City, create a greater mix of uses in Century City, and improve the walkability of the area through sidewalk improvements, pedestrian lighting, street trees, and landscaping and gardens visible from the public sidewalk. The project would be located within a commercial area and would not cause any encroachment into a residential area or stable, single-family neighborhoods.
Principle 3: Enable prosperity for all people: ▪ Ensure environmental justice regardless of race, ethnicity or income class. ▪ Encourage civic engagement.	**Consistent.** Although civic engagement is generally beyond the scope of an individual project, discrimination based on race, ethnicity or income class would be prohibited in the sale or use of the project's respective residential units. In addition, the project would enhance the pedestrian environment, and would contribute to the economic well-being of the City through the development of a high quality landmark building.
Principle 4: Promote sustainability for future generations ▪ Focus development in urban centers and existing cities. ▪ Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste. ▪ Utilize "green" development techniques.	**Consistent.** The project is located within an existing, intensely developed urban area. The project would implement conservation features, including LEED standards in building design and would implement other conservation measures and reduce energy demand, pollution, and waste.

Source: PCR Services Corporation, 2011.

project would be consistent with RTP goals to maximize mobility and accessibility for all people and goods in the region, support travel safety, and to maximize the productivity of the region's transportation system by locating within a close proximity to the Santa Monica Transit Parkway with existing transit line (bus rapid transit) and the future Century City Purple Line subway station. Based on the analysis presented in Table IV.H-7, the project would be consistent with applicable RTP policies. No significant impacts with respect to RTP policies, many of which were adopted for the purpose of avoiding or mitigating an environmental effect, would occur.

(ii) Compass Blueprint Growth Vision

Table IV.H-7 compares the project to applicable policies of the Compass Blueprint Growth Vision. The project would be consistent with the principals of the Compass Blueprint Growth Vision Plan in that it is located within the Plan's designated 2% Strategy Opportunity Area for the City of Los Angeles. The Compass 2% Strategy Opportunity Area is a key target area for regional development in which new development is focused in existing urban centers. As shown in Table IV.H-7, the project would support the Compass Blueprint Growth Vision Principle 1 to improve mobility for all residents, by locating a new development in a mutually supportive environment, in which new housing would be near existing jobs; development would be located in close proximity to transit; and a variety of travel choices would be available. The project is consistent with Principle 2 to foster livability by providing infill development and redevelopment to revitalize an existing community, providing a mix of uses, and by supporting a "people-scaled," walkable community; and Principle 4 in that development is focused in an existing urban center. In accordance with Principle 4, the project would meet LEED standards to reduce energy demand, pollution, and waste. As described in Table IV.H-7, the project would be consistent with SCAG's applicable Compass Blueprint Growth Vision principles and policies. No significant impacts with respect to policies, many of which were adopted for the purpose of avoiding or mitigating an environmental effect, would occur and, as such impacts with respect to this policy document would be less than significant.

(i) Conclusion

Based on the analysis of the consistency of the project with the applicable policies of the General Plan Framework Element, the Planning Commission's *Do Real Planning* policies, the City's *Walkability Checklist*, the West Los Angeles Community Plan, the CCNSP, the *Greening of Century City Pedestrian Connectivity Plan*, applicable land use regulations of the City of Los Angeles Planning and Zoning Code, SCAG's *2008 Regional Transportation Plan*, and SCAG's *Compass Blueprint Growth Vision* plan, the project would be substantially consistent with all the applicable policies. Approval of adjustments with regard to dwelling unit density and the calculation of buildable area would not result in a significant physical impact or consistency impact. Because the project would not be in substantial conflict with the adopted General Plan, Community Plan, Specific Plan, and applicable environmental policies in other regional and local plans, impacts with respect to plan consistency would be less than significant.

(2) Land Use Compatibility

(a) Compatibility of Use

Compatibility of use addresses whether the proposed project would be compatible with the predominant characteristics/mix of land uses in the surrounding area. Century City is an intensely developed urban community characterized by a mix of office, retail, hotel, restaurant, entertainment, and residential uses. Generally, commercial uses in Century City are located in the proximity of Santa Monica Boulevard, with

long-term residential uses located in the proximity of, or to the south of, Olympic Boulevard. Century City's commercial core area, however, is transitioning to incorporate high-rise residential uses among existing high-rise office buildings and other commercial uses. New residential projects in the Century City North area include the 147-unit 2055 Avenue of the Stars residential tower, located at the northwest corner of Avenue of the Stars and Olympic Boulevard; 262 residential units in the Westfield Century City project, located at 10250 Santa Monica Boulevard; and 208 residential units in the 2025 Avenue of the Stars mixed-use project, (Century Plaza Hotel site). The introduction of the project's residential uses in the northern part of Century City would foster a mixed-use environment in that area that would be consistent with the existing and growing residential character of the area.

Similar to the introduction of high-density residential uses to Century City's commercial core, the City of Beverly Hills is also proposing high-density residential uses in the vicinity of Santa Monica and Wilshire Boulevard. The Beverly Hilton Hotel site is currently known as the "Beverly Hilton Revitalization Project." That project includes 120 residential condominium units, a new 170-room hotel, and 11,500 square feet of restaurant uses. The Robinsons-May property adjacent to the Beverly Hilton Hotel site was previously approved for a mixed-use residential and commercial use, known as "9900 Wilshire;"[25] The 9900 Wilshire Project includes 252 residential units, 15,646 square feet of retail uses and 4,800 square feet of restaurant uses. However, this site was recently sold and the future use of the site is currently unknown.

The proposed project would adjoin non-residential uses to the south and west, including Beverly Hills High School to the south and the Northrop Center to the west. The Los Angeles Country Club is located north of the project, to the north of the Santa Monica Boulevard Transit Parkway. Commercial uses are also located to the northeast of the site and to the east of the project site to the north of the alley between South Santa Monica Boulevard and Durant Drive (at approximate mid block of the project site). These uses, located to the east of Moreno Drive, are located in the City of Beverly Hills. South of the alley, the project site is located directly across Moreno Drive from a multi-family neighborhood in the City of Beverly Hills.

The residential use represented by the project would be consistent with other residential uses in the surrounding area. The east edge of the project site facing the existing multi-family residential units across Moreno Drive in Beverly Hills would be densely landscaped with trees along Moreno Drive and landscape gardens within the project site. The substantial landscaped setback is located directly to the west of the nearest residential properties. The dense landscaping and the distance of the residential tower from the nearest off-site residential uses would provide a compatible interface between on- and off-site residential units.

The project would represent a consistent land use relative to Beverly Hills High School to the south. Public K-12 schools are generally sited in residential areas and considered appropriate land uses in residential zones. The proposed residential tower would be set back approximately 150 feet from the south property line and further buffered from the high school property by fencing and landscaped garden areas. The project's main entry on Santa Monica Boulevard would be buffered from the Beverly Hills High campus by project buildings and the landscaped garden. With the deep setback of the tower and dense landscaping and gardens between the tower and the high school campus, the proposed project would be compatible with the adjacent school to the south and residential uses to the east.

[25] *Approved by the City of Beverly Hills, April 11, 2008.*

The proposed project would introduce a different interfacing land use with respect to the adjacent office buildings in the Northrop Center. Conflicts of land use between residential and non-residential uses are generally caused by higher activity associated with non-residential uses that disrupt the use or quiet of a residential land use. However, due to the nature of the Northrop Center as executive offices used primarily during the daytime and in which activities are primarily inside, this use would not generate late night activity or other disturbances with respect to the project's residential use. In addition, activities associated with the proposed project would not be considered disruptive of the adjacent office buildings and would not adversely change the relationship or alter the community through ongoing disruption. Therefore, the proximity of these uses would be considered compatible.

The project site was previously occupied by a commercial land use, including an office building, restaurant, and parking structure, which was located along the south edge of the project site fronting both Beverly Hills High School and residential uses to the east of Moreno Drive. As the project site has been previously occupied by a land use that was not entirely consistent in use with the adjacent Beverly Hills High School and adjacent residential uses in the City of Beverly Hills to the east, the proposed residential tower, which is buffered from adjacent uses in the City of Beverly Hills by trees and other landscaping along Moreno Drive, would not adversely change the relationship between the project site and nearby and adjacent school and residential properties. As a residential use, the proposed project would not substantially or adversely change the existing relationships between numerous land uses or properties in the existing surrounding community through ongoing disruption, division, or isolation. Therefore, impacts with respect to compatibility of use would be less than significant.

(b) Compatibility of Intensity and Scale

With respect to its location within the boundaries of Century City, a designated Regional Center with no height restrictions in the existing C2-2 zone, the project would be consistent with the scale of Century City's high-rise component, including the twin 44-story Century Plaza towers; the 36-story MGM Tower; the 39-story AIG-SunAmerica Center; the 39-story Fox Plaza tower, the 41-story 2055 Avenue of the Stars residential tower, and the approved 39-story Westfield Century City Project tower.

Century City is surrounded on all sides by lower-density land uses, which contributes to the aesthetic benefits of Century City as a series of towers rising above the low-profile landscape outside its boundaries. In addition, Century City incorporates a range of building heights, which contributes to the quality and interest of the skyline. The proposed project would continue this pattern of development by contributing to the variety of building heights within Century City, and in its greater height compared to immediately adjacent buildings outside Century City. The juxtaposition of the taller building and lower density uses in the adjacent City of Beverly Hills would be softened through effects of the project's landscaped setback and open space along Moreno Drive. The project is not out of character with existing land use patterns between Century City and adjacent lower-density residential neighborhoods.

Because the proposed residential tower represents a continuation of an existing land use pattern, it would not substantially and adversely change the existing relationships between high-rise land uses within Century City and low-rise uses along Century City's borders. The proposed project would, therefore, not substantially and adversely change the existing relationships between numerous land uses or properties in the surrounding area, or have the long-term effect of adversely altering a neighborhood or community through

ongoing disruption, division or isolation. Therefore, land use impacts with respect to compatibility of intensity and scale would be less than significant.

4. CUMULATIVE IMPACTS

Section III, *General Description of Environmental Setting*, provides a list of projects that are planned or are under construction in the proposed project area. Forty related projects have been identified in the proposed project's study area. Of these, 18 are located in the City of Los Angeles and 22 are located in the City of Beverly Hills. Eight large-scale related projects are located in the near vicinity of the project site, and/or are located within CCNSP area of Century City, and would potentially contribute to a cumulative land use impact when combined with the project. Four of these are located in the City of Los Angeles and five of these are located in the City of Beverly Hills. These related projects in close proximity include the following:

- Related Project No. 2: Commercial Development at 10700 Santa Monica Boulevard, City of Los Angeles - 35,000 square feet of office construction and 9,000 square feet of retail uses.
- Related Project No. 14: Westfield Century City Expansion Project at 10250 Santa Monica Boulevard, City of Los Angeles - Redevelopment of existing retail mall to allow a net increase of 358,881 square feet of retail and restaurant uses, a net decrease of 289,460 square feet of office uses, and 262 residential units in a 39-story building.
- Related Project No. 16: Mixed Use Development at 2025 Avenue of the Stars, City of Los Angeles – Redevelopment of the Century Plaza Hotel site with 208 residential condominiums, 240-room hotel, 117,600 square feet of offices, 16,800-foot fitness club, 15,400 square feet of restaurant use, and 93,800 square feet of retail uses.
- Related Project No. 18: Currently proposed office project at 1950 Avenue of the Stars, City of Los Angeles – Development of 725,830 square feet of office uses in one 37-story high-rise tower and two low-rise (one story and two story) buildings. (Previously approved for 438 residential units in two 47-story towers and one 12-story building).
- Related Project No. 20: Mixed Use Development at 9900 Wilshire Boulevard, City of Beverly Hills – Former Robinsons-May site, approved for 252 residential units, 15,646 square feet of retail uses, and 4,800 square-foot restaurant.
- Related Project No. 21: Beverly Hills Gateway at 9844 Wilshire Boulevard, City of Beverly Hills - 95,000 square feet of general office uses.
- Related Project No. 22: Beverly Hilton Revitalization Project at 9876 Wilshire Boulevard, City of Beverly Hills - New 170-room hotel, 120 residential condominium units, and 11,500 square feet of restaurant uses.
- Related Project No. 24: Office Building at 9900 Santa Monica Boulevard, City of Beverly Hills - 119,000 square feet of office uses.

The related projects as currently proposed would introduce residential uses in areas that are zoned for commercial uses, and represent a trend from all-commercial to mixed use. In Century City, two related projects (Nos. 14, and 16) would result in an increase of 470 residential units. Combined with the proposed project, the combined increase in residential units in Century City would be 753. In the City of Beverly Hills, in the proximity of the project site, two related projects (Nos. 20 and 22) would provide 372 residential

units. The total combined increase in residential units in Century City and the adjacent area of Beverly Hills would be 1,125.

Total related projects in the project study area within the City of Los Angeles (including Related Projects No. 3, 4, 7, 8, 9, 12, 14, 15, 16, 17, and 18) include approximately 1,439 residential units and, combined with the proposed project, include approximately 1,722 residential units. The City of Los Angeles estimates approximately 38,200 residential units in 2009 in the census tracts making up the West Los Angeles Community Plan area. SCAG's 2008 RTP estimates 48,596 units in 2020 in the same census tract areas. This difference represents an increase of approximately 10,396 new residential units in the West Los Angeles community between 2009 and 2010. Total housing units under the related projects combined with the proposed project represents approximately 16.6 percent of the anticipated growth. As the combined total in the project study area (within the City of Los Angeles) would not exceed the projected 10,396 new residential units in the West Los Angeles Community Plan area, the cumulative increase in residential units would be less than significant.

An increase in residential units in the jobs-rich Century City area would be consistent with the goals of the 2008 RTP to balance jobs and housing. This policy is expected to reduce commuting trips and miles traveled. As with the Century City area, the City of Beverly Hills in the vicinity of the Santa Monica Boulevard corridor is designated as a "2% Strategy Opportunity Area" (SCAG, Compass Blueprint Plan), which allows for growth consistent with the 2008 RTP. Therefore, the cumulative total increase in residential units in Century City and adjacent sites in Beverly Hills would be consistent with growth and jobs/housing balance policies for the area and would be less than significant.

Development of the eight nearby related projects and the other 32 more distant related projects is expected to occur in accordance with City of Los Angeles and City of Beverly Hills adopted plans and regulations. Based on the information available regarding the related projects, it is reasonable to assume that the projects under consideration in the Cities of Los Angeles and Beverly Hills would implement and support important local and regional planning goals and policies. The related projects within Century City would be required to comply with the CATGP Trip limitations set forth in the CCNSP. Furthermore, the use of replacement and transferred trips would additionally limit new development within Century City that would, otherwise, result in a potentially significant traffic impact. 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.

5. MITIGATION MEASURES

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

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The proposed project would be substantially consistent with the existing regulatory framework relative to land use, including the General Plan Framework, the Walkability Plan, the West Los Angeles Community Plan, the CCNSP, the Greening of Century City Pedestrian Connectivity Plan, the Zoning and Planning Code,

and SCAG's 2008 RTP and Compass Growth Plans. In addition, the proposed project would be consistent with existing land use patterns and scale represented by the juxtaposition of high intensity development within the boundaries of Century City and surrounding lower-intensity communities. Because the project would be consistent with applicable plans and policies and would not create a division or disruption of an established community, land use impacts would be less than significant.