Division of Land / Environmental Review

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Volume 1

DRAFT ENVIRONMENTAL IMPACT REPORT

WEST LOS ANGELES COMMUNITY PLAN AREA

10000 Santa Monica Boulevard Project

ENV-2011-0540-EIR
State Clearinghouse No. 2011041042

Council District 5

THIS DOCUMENT COMPRISES THE FIRST PART OF THE ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE PROJECT DESCRIBED. THE FINAL EIR WILL COMPRISE THE SECOND AND FINAL PART.

Project Address: 10000 Santa Monica Boulevard, Los Angeles, California 90067

Project Description: SM 10000 Property, LLC, (the Applicant) proposes the development of a residential project at 10000 Santa Monica Boulevard within the Century City community of the City of Los Angeles. The project would provide up to 283 residential units in a building up to 39 stories and approximately 460 feet of height. The project would also include a smaller maximum 9-story (approximately 90-feet in height) ancillary building containing parking and recreation/site amenities for project residents. The project would also provide a large amount of ground-level landscaped open space, and a large landscaped recreation deck on top of the ancillary building.

APPLICANT:
SM 10000 Property, LLC

PREPARED BY:
Environmental Review Section
Los Angeles City Planning Department

September 15, 2011

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I. Executive Summary

I. EXECUTIVE SUMMARY

This section of the Draft Environmental Impact Report (Draft EIR) is prepared pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15123; and provides a brief summary of the proposed project and its potential environmental impacts. More detailed information regarding the project and its potential consequences is provided in the following sections of this Draft EIR. Also included in this section of the Draft EIR is an overview of the purpose and focus of the Draft EIR, a description of the organization of the Draft EIR, background information regarding the project site, a general description of the project, a general description of areas of controversy, a description of the public review process for the Draft EIR, and a summary of the Alternatives to the project evaluated in the Draft EIR.

A. PURPOSE OF THE DRAFT EIR

The purpose of this Draft EIR is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the 10000 Santa Monica Project, pursuant to Section 15121(a) of the State CEQA Guidelines. The Draft EIR is a Project EIR as defined by Sections 15161 and 15362 of the State CEQA Guidelines. The City of Los Angeles has the principal responsibility for approving the proposed project and, as the Lead Agency, is responsible for the preparation and distribution of this Draft EIR pursuant to CEQA Statute Section 21067. This Draft EIR will be used in connection with all other permits and all other approvals necessary for the construction and operation of the proposed project. This Draft EIR will be used by the City of Los Angeles Department of Planning, Department of Building and Safety, Department of Transportation, and Department of Public Works, including the Bureaus of Engineering and Sanitation, City Council of the City of Los Angeles, and other responsible public agencies that must approve activities undertaken with respect to the project.

This Draft EIR evaluates the environmental impacts determined by the City of Los Angeles to be potentially significant and discusses the manner in which the project's significant effects can be reduced or avoided through the implementation of mitigation measures. Impacts that cannot be mitigated to a level below significance are considered significant unavoidable adverse impacts. In accordance with Section 15130 of the State CEQA Guidelines, this Draft EIR also includes an examination of the effects of cumulative development in the vicinity of the proposed project. Cumulative development includes all anticipated future projects that, in conjunction with the proposed project, may result in a cumulative impact. In addition, this Draft EIR evaluates the extent to which environmental effects could be reduced or avoided through the implementation of feasible alternatives to the proposed project. Furthermore, the City is responsible for certifying the Draft EIR and adopting mitigation measures needed to address the proposed project's significant environmental impacts. For projects that result in unmitigated or under-mitigated significant environmental effects, the City may, after making a series of findings, certify the Draft EIR upon adoption of a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

B. DRAFT EIR FOCUS AND EFFECTS FOUND NOT TO BE SIGNIFICANT

The focus of the Draft EIR is on the analysis of impacts that are considered potentially significant. In accordance with Section 15128 of the CEQA Guidelines, an EIR shall also contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not

discussed in detail in the Draft EIR. An Initial Study was prepared for the project and a Notice of Preparation (NOP) was distributed for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on April 12, 2011 for a review period ending on May 12, 2011. The NOP, Initial Study, and NOP comment letters are included within Appendices A.1, A.2 and A.3, respectively, of the Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR. The City of Los Angeles determined through the Initial Study that the proposed project would result in potentially significant impacts in the following issue areas:

- Aesthetics/Visual Resources
- Air Quality
- Cultural Resources (Archeological and Paleontological Resources)
- Geology/Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use/Planning
- Noise
- Public Services
    - Fire Protection
    - Police Protection
    - Schools
    - Libraries
    - Parks and Recreation
- Transportation/Traffic
- Utilities and Service Systems
    - Water Supply
    - Wastewater

The City of Los Angeles determined through the Initial Study that the proposed project would not have the potential to cause significant impacts in the following areas: Agricultural Resources, Biological Resources, Cultural Resources (Historic Resources) Mineral Resources, Population and Housing, Solid Waste, and Utilities (Electricity and Natural Gas). Therefore, these areas are not analyzed further in this Draft EIR, however their respective impacts are summarized in Section VI.F of this Draft EIR. Further discussion is provided in the project's Initial Study, which is included in Appendix A.2 of this Draft EIR.

C. DRAFT EIR ORGANIZATION

The Draft EIR is comprised of the following sections:

I. Executive Summary. This section describes the purpose and focus of the Draft EIR, Draft EIR organization, background information regarding the project site, a summary of the project, areas of controversy/issues to be resolved, a description of the public review process, a summary of alternatives evaluated, and a summary of environmental impacts and mitigation measures.

II. Project Description. This section describes the project location, existing conditions, project objectives, characteristics of the proposed project, and a description of the intended use of the Draft EIR.

III. General Description of Environmental Setting. This section contains a description of the existing natural and built environments, and background information used to evaluate cumulative impacts that includes a list of past, present, and reasonably anticipated future projects to be built within the project vicinity.

IV. Environmental Impact Analysis. This section contains the environmental setting, project and cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: (1) aesthetics/visual resources, (2) air quality, (3) cultural resources, (4) geology and soils, (5) greenhouse gases, (6) hazards and hazardous materials, (7) hydrology and water quality, (8) land use, (9) noise, (10) public services (fire protection, police protection, schools, libraries, and parks and recreation), (11) transportation and circulation, and (12) utilities and service systems (water supply, and wastewater).

V. Alternatives to the Propose Project. This section provides analysis of each of the alternatives to the proposed project, which include the following: No Project/No Build; Reduced Project – Residential/Hotel – With Existing Trips; Reduced Project – Office – With Existing Trips; and Reduced Density Residential.

VI. Other Environmental Considerations. This section of the Draft EIR addresses several additional topics required under the State CEQA regulations. First, it provides a discussion of significant unavoidable impacts that would result from the proposed project; the reasons why the project is being proposed notwithstanding the significant unavoidable impacts; and the project's significant irreversible changes in the environment. This section of the Draft EIR also analyzes growth-inducing impacts of the project to determine whether the project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Potential secondary effects caused by the implementation of the mitigation measures for the proposed project are also discussed. Finally, this section provides a discussion of the effects that were determined within the Initial Study not to be significant.

VII. References. This section lists the references and sources used in the preparation of the Draft EIR.

VIII.List of Preparers. This section lists the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

This Draft EIR includes the environmental analysis prepared for the project and seven appendices as follows:

- Appendix A – Initial Study/NOP/NOP Comment Letters
  - A.1 Notice of Preparation
  - A.2 Initial Study
  - A.3 Comment Letters on the NOP
- Appendix B – Air Quality and Greenhouse Gas Emission Analysis Worksheets
  - B.1 Construction-Regional and Localized Emissions
  - B.2 Operations – Regional and Localized Emissions
  - B.3 Health Risk Assessment
  - B.4 Greenhouse Gas Emissions
- Appendix C – Cultural Resources- Cultural Resources Assessment
- Appendix D – Geotechnical Investigation
- Appendix E – Hazards and Hazardous Materials Technical Reports
  - E.1 Phase I Environmental Assessment
  - E.2 Methane Letter/Report
  - E.3 FAR Part 77 Airspace Obstruction Report
- Appendix F – Hydrology/Water Quality Study
- Appendix G – Noise Analysis Worksheets
- Appendix H – Transportation Analysis Report
- Appendix I- Public Services Correspondence
  - I.1 Police Services
  - I.2 Fire Services
  - I.3 Schools
  - I.4 Parks
  - I.5 Libraries
- Appendix J – Water and Sewer Utilities
  - J.1 Water Study-Domestic and Emergency Fire
  - J.2 DWP Water Service Letter
  - J.3 Wastewater/Sewer Study

D. EXISTING SITE CONDITIONS

The proposed project site consists of a rectangular, relatively flat, 2.4-acre parcel of land that is currently vacant and enclosed with construction fencing. Prior to 2006, the project site was occupied by office and restaurant uses, totaling over approximately 130,500 square feet with a separate above-ground parking structure.

The project site is located at the intersection of Santa Monica Boulevard, a major transit-oriented arterial to the north and Moreno Drive to the east. Regional access to the site is provided by Interstate 405 (San Diego Freeway) located approximately 2.2 miles to the west, and Interstate 10 (Santa Monica Freeway) located approximately 2.2 miles to the south. Other major arterials in the vicinity of the project site include Wilshire Boulevard further to the north, Beverly Glen Boulevard to the west and Olympic and Pico Boulevards to the south. The project site is also located in the vicinity of alternative, proposed stations for the extension of the Westside Subway, Metro Purple Line, that would link downtown Los Angeles with Westwood, via Century City.

The project site is within the West Los Angeles Community Plan area of the City of Los Angeles and within the boundaries of the Century City North Specific Plan (CCNSP). The areas to the south and west of the project site are generally characterized by mid- to high-rise office buildings, hotels, entertainment, and residential uses. The Los Angeles Country Club Golf Course is located immediately north of the project site across Santa Monica Boulevard. The City of Beverly Hills is located to the immediate south and east of the project site, which includes commercial and residential uses east of the project site across Moreno Drive. Beverly Hills High School is located immediately south of the project site. The Beverly Hilton Hotel and the recently approved, Robinsons-May (9900 Wilshire) mixed-use project are both located northeast of the project site across Santa Monica Boulevard.

E. PROPOSED PROJECT

1. Project Characteristics

SM 10000 Property, LLC, (the Applicant) proposes to develop a residential project at 10000 Santa Monica Boulevard within the Century City community of the City of Los Angeles. Upon completion, the project would include approximately 469,575 square feet of floor area. The project would provide up to 283 luxury residential units in a building that would be up to 39 stories height, and comprised of approximately 458,243 square feet. This building would be up to 460 feet above grade,[1] and located within the northern portion of the site along Santa Monica Boulevard, with a main entryway and lobby facing Santa Monica Boulevard.

The proposed project would also include a smaller ancillary building to accommodate project parking and some of the project's site amenity/recreation facilities. The ancillary building would be directly accessible from the residential building and would be located toward the rear of the project site, away from the Santa Monica Boulevard and Moreno Drive frontages. Recreation facilities located in the ancillary building would include a large indoor lap pool and a landscaped roof deck with outdoor pool, sundeck, hot tub and tennis court facility.

The project would include a large amount of open space, with approximately 43,141 square feet of ground-level landscaping, mostly located in a large garden area on the south/eastern part of the site; and approximately 27,579 square feet of open space on a landscaped recreation deck on top of the ancillary building. The 43,141 square feet of ground level open space would comprise approximately 41 percent of the project site.

Vehicle access to the project site would be provided via Santa Monica Boulevard and Moreno Drive with internal access drives connecting with the parking garage and valet area. The western access driveway from Santa Monica Boulevard would provide for two-way right-turn inbound/right-turn outbound traffic only, while the eastern access driveway to Santa Monica Boulevard would provide for one-way right-turn outbound traffic only. The Moreno Drive entry would provide for full right-turn and left-turn ingress and egress; however the driveway would be closed to vehicular access during weekday morning and afternoon peak periods to facilitate traffic access to/from Beverly Hills High School. A valet drop-off and pick-up area would be located within the northern portion of the site for use by residents and visitors. Additionally, service entry and exit would be provided via the western access driveway along Santa Monica Boulevard, connecting with an enclosed loading area, not visible to the street that would serve the residential building within the northwestern portion of the site. The design of the service area would permit trucks to turn around on-site before departing the project site.

The project would include approximately 708 parking spaces which would be provided within one partially-subterranean level and an above grade ancillary building. The parking would be provided with one of two project options: Under a Conventional Parking Option parking would be provided with one level of partially below grade parking and an additional nine floors of above grade parking. The parking arrangement within the parking structure would be similar to the standard arrangements commonly found in parking structures. With an Automated Parking Option, parking would be provided with an "automated parking system." Automated parking systems provide parking in a manner that reduces space requirements, reduces air quality emissions and saves energy. With an automated system, vehicles are driven onto a platform at the garage entryway where car engines are turned off. Through the system, a robotic platform is then dispatched to the vehicle to lift it and convey it to a storage space. When the driver is ready to leave the site, a request for the vehicle is entered into a computerized system which conveys the vehicle from its storage location back to the parking garage entryway. If the automated parking option is implemented the area required for parking would be reduced, and the size of the ancillary building would be reduced from nine stories to four stories above grade.

2. Necessary Approvals

It is anticipated that approvals required for the proposed project would include, but may not be limited to, the following:

- Vesting Tentative Tract Map and Haul Route;
- Project Permit Compliance Review, including Site Plan Review;

[1] *As measured pursuant to City of Los Angeles Municipal Code. With mechanical rooms, which are not counted in calculating the height pursuant to the Municipal Code, the building would have a maximum height of 483 feet above the adjacent grade.*

- 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;
- 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.

F. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue topics where the potential for a significant unavoidable adverse impact has been identified. These environmental topics include the short-term construction impacts related to air quality and noise/vibration. NOP comment letters focused on these issues particularly as the impacts would affect students at Beverly Hills High School. Other High School related issues addressed security and safety for high school students. Other issues known to be of concern in the community include general traffic impacts along with the air quality and noise impacts associated with traffic; and traffic issues associated with accessibility along Moreno Drive and cut-through traffic in nearby neighborhoods. NOP comments also addressed issues regarding cumulative development and the impacts of such development across the range of environmental topics including transportation/traffic, infrastructure and public services.

G. PUBLIC REVIEW PROCESS

The City of Los Angeles circulated an NOP for a 30-day review period, beginning April 12, 2011 and ending May 12, 2011. In addition, a public scoping meeting was held on April 27, 2011. The NOP and letters and comments received during the comment period, as well as comment sheets from the public scoping meeting are included in Appendix A of this Draft EIR. In addition, this Draft EIR will be released for a minimum 45-day public comment period. Following the public comment period a Final EIR will be prepared that will include responses to the comments raised regarding the Draft EIR.

H. SUMMARY OF PROJECT ALTERNATIVES

The Draft EIR examined four [alternatives to the proposed project in detail, which include: No Project/No Build; Reduced Project – Residential/Hotel – With Existing Trips; Reduced Project – Office – With Existing Trips; and Reduced Density Residential A general description of these Alternatives and a comparative summary of their impacts relative to the project are provided below.

Alternative 1: No Project/No Build Alternative

The No Project/No Build Alternative addresses the circumstance that would prevail if the project would not proceed, pursuant to Section 15126.6(e)(3)(B) of the State CEQA Guidelines. The alternative assumes that no new development would occur within the project site; and that the site would remain undeveloped and

vacant. Environmental effects under this Alternative would be similar to the negligible effects for most issues associated with existing undeveloped site conditions. The No Project/No Build Alternative would not result in new environmental impacts, and overall would result in a reduced level of impact when compared to the proposed project. Additionally, the project's significant and unavoidable short-term construction impacts on air quality and noise/vibration would be avoided under this Alternative. However, under the No Project/No Build Alternative, the majority of the objectives established for the project would not be attained.

Alternative 2: Reduced Project – Residential/Hotel Use – With Existing Trips

The proposed Residential/Hotel Use would reduce the size of the project by replacing a large number of the residential units with hotel rooms. The alternative would have 100 residential units and 138 hotel rooms, the maximum unit count per the Replacement Trips available at the project site. The hotel component would also include 10,000 sq.ft. of hotel related/support uses, the maximum allowed under a hotel/non-retail classification in the CCNSP. Support uses would include a restaurant/bar, a small banquet facility and provision for sundry sales. This alternative would reduce building area (and related construction impacts) from 469,575 sq.ft. to 289,500, a reduction of approximately 38 percent. It is assumed that this alternative would use a site design similar to that of the proposed project, would reduce the amount of construction, and thus construction related impacts through a reduction in building heights. Accordingly, the residential and hotel uses would be provided in a roughly estimated 23 story tower, up to approximately 375 feet in height. Parking would be provided in a 4-story ancillary parking structure to provide the 319 parking spaces that would be required for such a project. The two buildings would have floor-plate areas and site locations similar to those of the proposed project.

Alternative 2 would have significant construction noise/vibration and air quality impacts similar to those of the proposed project, although the number of days during which they would occur would be reduced slightly. Further, this alternative would, like the proposed project, exceed the two-hour shading standard established in the Century City North Specific Plan. Long term operations impacts of this alternative would be greater on air quality/greenhouse gas emissions, land use, noise, police services and traffic. Impacts on other topics would be similar to or less than those of the proposed projects. This alternative would not fully meet most of the project objectives.

Alternative 3: Reduced Project – Office – With Existing Trips

The Reduced Project -- Office With Existing Trips Alternative would develop an office building in place of the proposed residential building. The 2,143 Replacement Trips available for the site would allow for 153,000 sq.ft. of office space. This alternative is proposed in response to the site's C2-2-O zoning designation, the fact that this was the site's previous use, and it is indicative of a potential future use, if the proposed project does not proceed. This alternative would reduce the amount of building (and related construction impacts) required, reducing FAR area from 469,575 sq.ft. to 153,000 sq.ft., a reduction of approximately 67 percent. The office building would require 306 parking spaces. One potential arrangement would be a five story building inclusive of one subterranean level; and a floor-plate of approximately 250 feet by 210 feet.

Alternative 3 would have significant construction noise and air quality impacts similar to those of the proposed project, although the number of days during which they would occur would be reduced slightly. The alternative would reduce the amount of shading to a level that would be less than the two-hour shading standard established in the CCNSP. Long term operations impacts of this alternative would be greater on air

quality/greenhouse gas emissions, land use, fire services, police services and traffic. Impact on other topics would be similar to or less than those of the proposed project. This alternative would not fully meet most of the project objectives.

Alternative 4: Reduced Density Residential

The Reduced Density Residential Alternative would provide a development project under which the amount of residential development has been reduced by 25 percent. Such a reduction would reduce the number of residential units on the project site from 283 units to 212 units. The area of the residential tower would be reduced to 352,181 square feet. The alternative would use only 1,607 of the available 2,143 Replacement Trips available at the project site. It is assumed that the reduction in size would be accommodated by reducing the height of the building by approximately 25 percent with the placement of buildings similar to that of the proposed project. The height of the alternative would be approximately 345 feet high. The alternative would require 531 parking spaces that would be provided within one semi-subterranean parking level and a six-story ancillary building at the same location as the proposed project's ancillary building.

Alternative 4 would have significant construction noise/vibration and air quality impacts similar to those of the proposed project, although the number of days during which they would occur would be reduced slightly. Further, this alternative would, like the proposed project, exceed the two-hour shading standard established in the CCNSP. Long term operations impacts of this alternative would generally be similar to or less than those of the proposed project. This alternative would not fully meet most of the project objectives.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR; and that if the No Project/No Build Alternative is the environmentally superior alternative, the Draft EIR shall identify another environmentally superior alternative among the remaining alternatives. An environmentally superior alternative is an alternative to the project that would reduce and/or eliminate the significant, unavoidable environmental impacts associated with the project without creating other significant impacts and without substantially reducing and/or eliminating the environmental benefits attributable to the project.

Since the environmentally superior would be the No Project/No Build Alternative, the Reduced Project -- Office With Existing Trips Alternative was identified as the environmentally superior alternative amongst the remaining alternatives. It would reduce the project's potentially significant noise/vibration, air quality and shading impacts to a greater extent than the other alternatives. It would reduce the greater than two-hour CCNSP shading effect to a less than significant level; however the construction air quality and noise/vibration impacts would continue to be significant and unavoidable. Further, while this alternative does reduce some project impacts, it increases others. Most notably this alternative would generate more traffic than would the proposed project, and it would not contribute to the land use patterns in City and regional policies that favor the establishment of more residential development in Century City. Further, this alternative would not meet many of the objectives of the proposed project, and would not fully meet most of the project objectives. While the Reduced Density Residential Alternative would reduce some non-significant impacts of the project, it would not eliminate the significant shading impact as would the Reduced Project – Office with Existing Trips Alternative; and would not reduce the significant construction noise/vibration and air quality impacts to the same extent as that alternative.

I. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Section IV of this Draft EIR provides detailed analyses of the potential environmental impacts of the proposed project. The impacts discussed there are summarized herein.

A. Aesthetics/Visual Resources, Light/Glare, and Shading

(1) Environmental Impacts

(a) Visual Character and Viewsheds

(i) Construction

Because of the short-term, temporary nature of the construction activities and the appearance of the site as a vacant, partially excavated construction site during the last several years, construction activities would not substantially alter, degrade, eliminate or generate long-term contrast with the visual character of the surrounding area or the existing project site. Therefore, impacts with respect to aesthetic value and character would be less than significant. Notwithstanding, a 12-foot construction wall with aesthetic treatments, which would be provided as a project feature, would screen views of ground-level activities during construction and would improve the visual effect created by the existing wall.

(ii) Operation

The area surrounding the project site is highly urbanized and the aesthetic character of the area is strongly influenced by the mid-and high-rise buildings of Century City. The predominant high-rise structures of Century City, which are visible from a great distance throughout the Los Angeles Basin, create a distinctive component of the west Los Angeles urban skyline. The project's proposed 39-story tower would result in greater density and building mass at the project site than under existing conditions. However, the 39-story residential tower would complement existing modern building design in Century City and would be consistent the established high-rise character of Century City, which includes a variety of contrasting building heights between high-rise buildings and surrounding low-rise communities.

Because of the deep setbacks, consistency with existing development patterns in the area, and landscaped gardens to soften interfacing between the project site and low-rise properties to the east and south, the project would not substantially detract from the visual character of the area or alter, degrade, or eliminate existing features that contribute to the visual character of the area. Therefore, the project would have a less than significant impact with respect to visual quality and aesthetic character.

(b) View Obstruction

While the proposed project's residential tower would be highly visible from numerous locations, it would not block public views of existing or unique scenic resources, it would be consistent with the cluster of high rise buildings characterizing Century City, and it would not alter or change the character of any scenic areas. Further, in many instance, the project would add interest and variety to the Century City skyline. Therefore, impacts of the proposed project on views would be less than significant.

(c) Light and Glare

(i) Construction

Construction activities would occur primarily during daylight hours and construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Artificial light associated with construction activities would not significantly impact residential uses, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Therefore, artificial light impacts associated with construction would be less than significant.

Construction activities are not anticipated to result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Therefore, less than significant impacts with respect to reflected sunlight and natural glare are anticipated.

(ii) Operation

Artificial Light

New light sources would include light from windows of the residential tower during the evening hours. The increase in ambient lighting is not expected to interfere with activities in nearby residential neighborhoods, in which interior lighting follows a similar pattern (ceasing when residents retire for the night). In addition, the increase in ambient lighting resulting from interior lighting would not impact nearby office buildings or the Beverly Hills High School, which would generally not be operating during the late evening.

Exterior lighting would consist of security and wayfinding lighting, as well architectural highlighting. Project-related signage would be discrete and commensurate with the high-quality architecture and landscaping. Lighting would be designed and strategically placed to minimize glare and light spill onto adjacent properties and all project lighting would comply with the LAMC requirements that have been established to limit light spill on light-sensitive (residential) uses. With the implementation of project design features and applicable LAMC regulations, impacts attributable to project-induced artificial lighting would be less than significant.

Glare

The proposed residential tower would be constructed with materials that would not be notably reflective. In order to ensure that the residential tower's window glass and architectural materials would not cause glare from reflected sunlight at any other glare-sensitive locations, review of all building materials by the Department of Building and Safety to ensure that highly reflective materials are not utilized along the building facades is recommended as a mitigation measure. With the implementation of the proposed mitigation measure, potential glare from the building façade would not substantially alter the character of off-site areas surrounding the project site.

(d) Shading

The proposed project would add new structures to the project site including the 39-story residential tower. Limited shading would occur on the Los Angeles Country Club Golf Course across Santa Monica Boulevard from the proposed project site and on residential uses to the east of the project site. Shading at Beverly Hills High School, south of the project site, would be extremely limited. Project shading would, however, exceed a

CCNSP two-hour shading standard at one single-family residential unit in Beverly Hills. Off-site shading impacts would not exceed CEQA significance thresholds at any off-site sensitive location, and therefore would not significantly affect off-site shade sensitive activities. Further, the two-hour CCNSP standard is not included within Beverly Hills policies. Notwithstanding, exceeding the two-hour standard has been conservatively identified as a potentially significant impact.

(2) Cumulative Impacts

The nearest eight related projects in the vicinity of the project site have been, or would be, constructed according to high-quality architectural design and would not individually or cumulatively cause the existing visual character of the area to be substantially altered or degraded. In addition, because the City's high-rise clusters are considered to add to the quality of skyline views, the tower elements introduced by the project and related projects would not substantially detract from the visual character of an area. Therefore, the cumulative impact of the related projects, combined with the proposed project, would be less than significant with respect to aesthetic character.

The high-rise elements in the related projects have the potential to block views from public streets and other vantage points, such as public parks, in and around the project vicinity. However, no scenic views through the Avenue of the Stars and Santa Monica Boulevard corridors, both locally designated scenic highways, would be blocked. The Related Projects tend to fall within different viewsheds than those of the proposed project. Therefore, the proposed project would not cumulatively contribute to blockages of valued public views

It is anticipated that the related projects located near the project site in Century City and Beverly Hills would contribute to an increase in ambient light in the area. However, as new projects are substantively residential (a light sensitive use) in character, they would exhibit a similar pattern of lighting as existing residential uses. Therefore, cumulative light increases from residential uses interfacing with the area's residential neighborhoods would not alter the character of these light-sensitive uses. Some of the nearby related projects also would replace existing commercial uses and are not expected to significantly increase illuminated signage, vehicle traffic or light and glare associated with traffic headlights. The proposed project's potential glare impacts would be eliminated through the implementation of project design features and the recommended mitigation measure, and would not contribute to a cumulative glare effect.

The related projects' high-rise components would cast shadows on the surrounding area. However, the related projects are located such that shading from these projects would not contribute to cumulative shading effects with those of the proposed project. Therefore, cumulative shade impacts would be less than significant.

(3) Mitigation Measures

With the implementation of the project's architectural and landscape design features, visual quality impacts would be less than significant. In addition, no significant impacts with respect to view obstruction are anticipated. With the implementation of the project's design features and existing LAMC signage and lighting regulations, no significant artificial light impacts have been identified. However, a potentially significant impact associated with reflected sunlight has been identified and addressed with a mitigation measure,

below. In addition, mitigation measures are also recommended to ensure that specific design features would be implemented to reduce potential impacts to less than significant levels.

Mitigation Measure A-1: The Applicant shall provide a 12-foot construction fence for neighborhood protection during construction of the project, which is covered with an aesthetic treatment.

Mitigation Measure A-2: The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

Mitigation Measure A-3: The Applicant shall prepare a street tree plan to be reviewed and approved by the City's Department of Public Works, Street Tree Division. All plantings in the public right-of-way shall be installed in accordance with the approved street tree plan.

Mitigation Measure A-4: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the City of Los Angeles Department of Planning.

Mitigation Measure A-5: All new street and pedestrian lighting within the public right-of-way shall be approved by the Bureau of Street Lighting and shall be tested in accordance with the requirements of the Bureau of Street Lighting.

Mitigation Measure A-6: All new street and pedestrian lighting shall be shielded and directed away from any light-sensitive off-site uses.

Mitigation Measure A-7: Prior to the issuance of a building permit, architectural plans for all exterior lighting shall be submitted to the Department of Building and Safety for review to ensure that lighting has low reflectivity in accordance with Illuminating Engineers Society (IES) standards to minimize glare and limit light onto adjacent properties.

Mitigation Measure A-8: Prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façade and rooftop shall be submitted for review to the Department of Building and Safety to ensure that highly reflective materials are not utilized.

(4) Level of Significance After Mitigation

No significant impacts with respect to aesthetic character and views would be anticipated. A potentially significant impact with respect to reflected sunlight or other glare from any building surface materials, including the architectural roof feature, was identified in the Light and Glare analysis. Although it is anticipated that non-reflective glass and other materials would be implemented, this issue would be addressed through Mitigation Measure A-8. With the implementation of this mitigation measures, potential glare impacts would be reduced to less than significant levels.

No significant shade impacts would occur pursuant to the City's CEQA significance thresholds, however project shading would exceed a two-hour shading standard found in the CCNSP. The project would be substantially consistent with the plans and policies that are applicable to the project site; and impacts regarding policy and regulatory compliance would be less than significant.

B. Air Quality

(1) Environmental Impacts

(a) Construction

(i) Regional Construction Impacts

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

The analysis of construction impacts on air quality under conservative construction program assumptions indicates that construction-related daily maximum regional emissions would not exceed the SCAQMD daily significance thresholds for CO, $PM_{2.5}$, VOC, or SO_X. However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for NO_X and PM_{10} during periods of heavy use of heavy-duty construction equipment. Therefore, regional construction emissions resulting from the project would result in a significant short-term impact. Impacts may be reduced due to (1) the availability of a more modern, cleaner burning, construction equipment fleet mix, or (2) a less intensive buildout schedule (lower daily emissions occurring over a longer time interval) occurs.

(ii) Localized Construction Impacts

The maximum localized construction emission estimates do not exceed the local significance thresholds (LSTs) for any of the criteria pollutants for which local impacts were analyzed (NOx, CO, PM_{10} or $PM_{2.5}$). The results of the dispersion modeling show that the annual PM_{10} concentrations resulting from construction emissions would not exceed the threshold of 1 ug/m^3 at the closest sensitive receptors. However, maximum NO_2 concentrations during construction activities would exceed the allowable thresholds at the closest residential uses to the east and the high school to the south. As such, localized air quality impacts during construction would be significant for NO_2 and mitigation measures would be required.

(iii) Toxic Air Contaminants

A Health Risk Analysis (HRA) was conducted to evaluate the carcinogenic risk to students and staff at Beverly Hills High School and residents in nearby housing that would result from exposure to localized sources of TACs during construction of the project. The analysis indicates that the proposed project would not emit carcinogenic toxic air contaminants that would individually or cumulatively exceed the maximum individual cancer risk of ten in one million due to project construction or project operations. Therefore, impacts with regard to TACs would be less than significant.

(iv) Odors

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

(b) Operational Impacts

(i) Regional Operational Impacts

Regional air pollutant emissions associated with proposed project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions.

Analyses of operations impacts on air quality indicate that regional emissions resulting from operation of the project are substantially below applicable thresholds for VOC, NOx, SOx, and $PM_{2.5}$. As a result, impacts related to regional emissions from operation of the proposed project would be less than significant.

(ii) Localized Operational Impacts

The conservative estimates of on-site daily emissions for NOx, PM_{10}, $PM_{2.5}$, and CO for each phase of operation were compared to the applicable screening thresholds, which are based on site acreage and distance to closest sensitive receptor. The analysis indicates that the maximum localized operation emission estimates are substantially less than the LSTs for NOx or CO, PM_{10} and $PM_{2.5}$.

The SCAQMD recommends an evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse. None of the project intersections would meet these criteria. Notwithstanding, localized CO impacts were analyzed for the project at two representative intersections based on the highest V/C ratios and proximity to the project site: South Santa Monica Boulevard and Wilshire Boulevard, and Sepulveda Boulevard and Santa Monica Boulevard. The analysis indicates that project-generated traffic volumes are forecasted to have a negligible effect on the projected 1-hour and 8-hour CO concentrations at the respective intersection locations. Since a significant impact would not occur at the intersections operating at the highest V/C ratio, no significant impacts would occur at any other analyzed roadway intersection as a result of weekday or weekend project-generated traffic volumes. Thus, the proposed project would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

(iii) Toxic Air Contaminants

Impacts to Off-Site Population

The primary sources of potential air toxics associated with proposed project operations include diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and on-site truck idling) and emergency backup generators. Pursuant to SCAQMD guidelines, the project is therefore not considered to be a substantial source of diesel particulate matter. Further, the increase in potential localized air toxic

impacts from on-site sources of diesel particulate emissions would be minimal since the proposed project does not involve use of heavy-duty trucks. The proposed project would likely include the installation and operation of diesel-fired generators for emergency power generation. Unless a blackout occurs, these generators would be operated for only a few hours per month for routine testing and maintenance purposes. The Applicant would be required to obtain a permit to construct and a permit to operate any standby generators under SCAQMD Rules 201, 202, and 203. Under SCAQMD Regulation XIII, all generators must meet BACT requirements to minimize emissions of PM_{10} (as well as CO, VOC, and NO_X emissions). SCAQMD Regulation XIV requires operation prior to issuance of a permit, to demonstrate that operation of the proposed generators will not result in increased health risk due to TAC exposures above the established criteria. Therefore the installation and operation of back-up generators would result in less than significant impacts.

Impacts from TACs to On-Site Population

CARB recommends that proximity to land uses that generate high levels of diesel particulate matter be considered in the siting of new sensitive land uses; and further recommends that site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses. Because the project is not located sufficiently proximate to the listed sources of diesel particulate matter, the siting of residential uses on the project site would result in a less than significant impact with regard to the exposure of on-site residents to the TAC emission sources identified in ARB's siting recommendations (i.e., the project would not site residential uses in a high cancer risk area due to ambient air quality).

(iv) Odors

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

(v) SCAQMD CEQA Air Quality Handbook Policy Analysis

The proposed project would be consistent with the SCAQMD policy analysis guidelines due to a number of project features and impacts. First, the proposed project would not result in an increase in the frequency or severity of existing air quality violations, cause or contribute to new air quality violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP. The proposed project would result in less than significant impacts with regard to CO, and SO_2, concentrations during project construction and less than significant for all pollutants during operations. While NO_2 and PM_{10} and $PM_{2.5}$ concentrations during construction would exceed the SCAQMD significance threshold, prior to mitigation, the impact would be short-term in nature and would not have a long-term impact on the region's ability to meet State and federal air quality standards.

Further, the proposed project would be consistent with population, housing and growth assumptions that were used in the development of the AQMP. Also, the proposed project would serve a number of land use policies of the City of Los Angeles and SCAG that are aimed at reducing air quality impacts. The proposed project, by virtue of its location and design, would provide benefits to the reduction of vehicle trips and vehicles miles traveled. It would provide a high density residential project in an existing highly urbanized commercial district and employment center located within the urbanized greater West Los Angeles area that

is located near bus and transit facilities. It would also reduce vehicle trips and vehicle miles traveled by encouraging pedestrian activity through the location of residential population within walking distance of numerous employment, commercial/service and entertainment opportunities; and improvements to street-level pedestrian connectivity.

While development of the project would result in short-term regional impacts, project development would not have a long-term impact on the region's ability to meet State and federal air quality standards. The project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of PM_{10} and $PM_{2.5}$. Also, the project would be consistent with the goals and policies of the AQMP for control of fugitive dust. The project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

(vi) City of Los Angeles Policies

The project would also be consistent with the City of Los Angeles General Plan Air Quality Element and Clean Air Program policies since development of the proposed project at the proposed site location offers the opportunity to provide residential uses in the middle of a highly urbanized regional employment center and does so via the use of existing infrastructure, proximity to existing regional and local transit facilities, encouragement of pedestrian activity, and location near existing commercial uses that would meet many of the needs of the project's future residents. As the proposed project would be consistent with City of Los Angeles air quality policies, no significant impacts would occur as a result of project development with respect to compatibility with applicable air quality policies as set forth in the City's General Plan Air Quality Element.

(2) Cumulative Impacts

(a) Construction

According to the SCAQMD, individual project's that exceed the SCAQMD's recommended daily threshold for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. Construction-period NO_X mass regional emissions, and localized NO_2 and PM_{10} emissions associated with the proposed project are already projected to result in a significant impact to air quality. As such, cumulative impacts to air quality during proposed project construction would also be significant and unavoidable.

The proposed project's contribution to cancer risk from construction activities would be less than significant with mitigation. Related projects that have not already been built would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. Thus, TAC emissions from the related projects are anticipated to be less than significant individually and cumulatively.

Also similar to the proposed project, potential sources that may emit odors during construction activities at each related project would include the use of architectural coatings and solvents. SCAQMD Rule 1113 limits the amount of volatile organic compounds from architectural coatings and solvents. Via mandatory compliance with SCAQMD Rules, it is anticipated that construction activities or materials used in the construction of the related projects would not create objectionable odors. Thus, odor impacts from the

related projects are anticipated to be less than significant individually, as well as cumulatively in conjunction with the proposed project.

(b) Operation

Peak daily operation-related emissions would not exceed the SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the proposed project would not result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Therefore, the emissions of non-attainment pollutants and precursors generated by project operation in excess of the SCAQMD project-level thresholds would be cumulatively less than significant.

With respect to TAC emissions, neither the project nor any of the identified related projects (which are largely residential, restaurant, and retail/commercial developments), would represent a substantial source of long-term TAC emissions. However, the project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, among other things. SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant.

With respect to potential odor impacts, neither the proposed project nor any of the related projects (which include primarily general office, residential, retail, and restaurant uses) have a high potential to generate odor impacts. Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement BACT to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from related projects are anticipated to be less than significant individually and cumulatively.

(3) Mitigation Measures

(a) Construction

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

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

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

Mitigation Measure B-3: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

Mitigation Measure B-4: Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure B-5: Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used, if power poles are available.

Mitigation Measure B-6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site.

Mitigation Measure B-7: The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations**.**

Mitigation Measure B-8: The Applicant shall moisten soil not more than 15 minutes prior to moving soil or conduct whatever watering is necessary to prevent visible dust emissions from exceeding 100 feet in any direction.

Mitigation Measure B-9: The Applicant shall apply non-toxic chemical stabilizers according to manufacturer's specifications to disturbed surface areas (completed grading areas) within five days of completing grading or apply non-toxic dust suppressants or vegetation sufficient to maintain a stabilized surface.

Mitigation Measure B-10: Exposed pits (i.e., gravel, soil dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered, or treated with non-toxic soil stabilizers according to manufacturer's specifications.

Mitigation Measure B-11: The Applicant shall water excavated soil and debris piles hourly or cover them with tarps, plastic sheets or other coverings.

Mitigation Measure B-12: The Applicant shall water exposed surfaces at least three times a day under calm conditions. Water as often as needed on windy days when winds are less than 25 miles per hour or during very dry weather in order to maintain a surface crust and prevent the release of visible emissions from the construction site.

Mitigation Measure B-13: All trucks hauling dirt, sand, soil or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the material and the top of the truck). Wash mud-covered tires and under-carriages of trucks leaving construction sites.

Mitigation Measure B-14: The Applicant shall sweep adjacent streets, as needed, to remove dirt dropped by construction vehicles or mud that would otherwise be carried off by trucks departing the site.

Mitigation Measure B-15: The Applicant shall securely cover loads with a tight fitting tarp on any truck leaving the construction site.

Mitigation Measure B-16: The Applicant shall cease grading during periods when winds exceed 25 miles per hour.

(4) Level of Significance After Mitigation

(a) Construction

Implementation of the mitigation measures described above would reduce regional and local construction emissions for all pollutants. The project with mitigation would not exceed thresholds for localized emissions or regional emissions for VOC, CO, or PM2.5. However, after mitigation, the project would continue to exceed the SCAQMD regional significance thresholds for NO_x and PM_{10} during the most intense construction periods. The analysis represents a worst case scenario, and the significant impacts would be less during the overall duration of construction than indicated for the maximum conditions.

Implementation of the mitigation measures described above would also reduce the localized NO_2 emissions at nearby sensitive receptors that were identified as contributing to a potentially significant impact in the dispersion modeling analysis. The mitigated construction scenario would reduce the maximum off-site unmitigated annual and 1-hour NO_2 concentrations, however emissions at the residential and school areas would continue to exceed the LST threshold and remain significant. The maximum 1-hr and annual NO_2 emissions would remain in exceedance of NAAQS and CAAQS even with mitigation. As a result, localized NO_2 impacts would remain significant and unavoidable.

(b) Operations

The proposed project's impacts on air quality emissions due to project operations are less than significant, prior to mitigation. No mitigation measures are required.

C. Cultural Resources

(1) Environmental Impacts

(a) Archaeological Resources

The project site is located within a highly urbanized area, and the entire site has been subject to disruption over the years. The project site has recently been graded and excavated. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the project proposes excavation of the project site which would extend beyond the fill material, thus encountering the underlying Quaternary Age Older Alluvium. While discovery of archaeological remains in the fill deposits on the project site are unlikely, excavation occurring below the fill levels could potentially encounter archaeological remains. Therefore, a Mitigation Measure is recommended to reduce the potential impact of the proposed project on archaeological resources to a less than significant level.

(b) Paleontological Resources

Based on the paleontological records search, there are no vertebrate fossil localities that lie directly within the proposed project area. However, there are fossil localities nearby from the same Quaternary Alluvium sedimentary deposits that occur in the proposed project area. Given the previous disturbance of site soils, and the project's minimum excavation, the likelihood of encountering paleontological resources is extremely limited. However, because the project proposes excavation into older Quaternary Alluvium sediments, a Mitigation Measure is recommended to reduce the potential impact of the proposed project on paleontological resources to a less than significant level.

(c) Native American Resources

The project is not expected to have impacts on any known sites containing Native American Resources. However, the project area has been cited as being sensitive for cultural resources. Although the project site has been graded and disrupted over the years, the proposed project would require excavation into native soils. Therefore, there may be a potential for the discovery of Native American cultural resources during excavation into previously undisturbed sediments. A Mitigation Measure is recommended to ensure identification of Native American cultural resources that might be encountered. If human remains are found, mitigation is recommended to ensure the potential impact of the proposed project on Native American remains is less than significant.

(2) Cumulative Impacts

Cumulative impacts associated with archaeological resources would be less than significant since, like the proposed project, each of the related projects would be required to comply with the regulations cited above in the event that archaeological resources are found including PRC Section 21083.2 or PRC Section 21084.1 and CEQA Guidelines Section 15064.5. In addition, with regard to paleontological and Native American resources, with implementation of the proposed mitigation measures, project impacts would be less than significant. It would also be expected that other related projects would implement such mitigation measures on a case-by-case basis if deemed appropriate as part of their environmental review. Thus, cumulative impacts associated with paleontological and Native American resources would also be less than significant.

(3) Mitigation Measures

(a) Archaeological Resources

Mitigation Measure C-1: A qualified archaeologist shall be retained by the Applicant to review grading plans and geotechnical information and prepare a monitoring plan for all ground-disturbing activities in previously undisturbed sediments. A qualified archaeologist is defined as an archaeologist meeting the Secretary of the Interior Professional Qualification Standards for Archaeology. Ground-disturbing activities include primary construction-related activities and any associated secondary activities for support services such as utilities. In the event that archaeological resources are identified during monitoring or unexpectedly during excavations in fill sediments, all work proximal to the discovery shall halt until the qualified archaeologist has evaluated the find. If the archaeologist determines that the find is significant or may qualify as significant, the archaeologist shall prepare a treatment plan. If the find is prehistoric or includes Native American materials, affiliated Native American groups shall be invited to contribute to the treatment plan. Results of monitoring and any archaeological treatment shall be reported in an appropriate technical report to be filed with the Applicant, the City, and the California Historical Resources Information System (CHRIS). The Applicant, in consultation with the Lead Agency and Archaeologist, shall designate repositories in the event that resources are recovered.

(b) Paleontological Resources

Mitigation Measure C-2: A qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities on the project site where excavations into the older Quaternary Alluvium may occur. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of

excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Accompanying notes, maps, and photographs shall also be filed at the repository. Following the completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and fossil finds, if any, the methods used in these efforts, as well as a description of the fossils collected and their significance, if any. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies.

(c) Native American Resources

Mitigation Measure C-3: If human remains are unearthed during construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent of the deceased Native American, who shall then help determine what course of action shall be taken in dealing with the remains. The Applicant shall then take additional steps as necessary in accordance with CEQA Guidelines Section 15064.5(e) and Assembly Bill 2641.

(4) Level of Significance After Mitigation

Upon implementation of the mitigation measures outlined above, potential impacts to archaeological and paleontological resources, as well as Native American resources would be reduced to a less than significant level.

D. Geology

(1) Environmental Impacts

The project site does not have geological/soil conditions that neither are unique to its setting nor found throughout Century City. The project site does not lie on a known active fault and is subject to seismic shaking that is common to Los Angeles. Potential impacts regarding geology and soils would be typical of those that are addressed through standard/regulatory engineering practices. A mitigation measure has been recommended that requires the project to present a Geotechnical Report to the Department of Building Safety in order to meet seismic safety and design requirements for foundations, retaining walls/shoring and excavation.

(2) Cumulative Impacts

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

(3) Mitigation Measures

Mitigation Measure D-1: Prior to issuance of a grading permit, a qualified geotechnical engineer shall prepare and submit to the Department of Building and Safety a final Geotechnical Report that provides recommendations to address seismic safety and design requirements for foundations, retaining walls/shoring and excavation. A qualified geotechnical engineer shall be retained by the Applicant to be present on the project site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in the Geotechnical Report as well as other recommendations made in subsequent geotechnical investigations prepared for the project subject to City review and approval. When/if needed, the geotechnical engineer shall provide structure-specific geologic and geotechnical recommendations which shall be documented in a report to be approved by the City and appended to the project's previous geotechnical reports.

(4) Level Of Significance After Mitigation

With implementation of Mitigation Measure D-1, potential impacts of the project associated with geology and soils would be reduced to less than significant levels.

E. Greenhouse Gas Emissions

(1) Environmental Impacts

(a) Construction

Construction of the project is estimated to emit a total of 7,814 tons of CO2e over the 36 months of construction. When amortized across the 30 year lifetime of the proposed project, per SCAQMD methodology for analyzing impacts on global warming, the construction results in approximately 260 tons per year of CO_2e, which is a component of the project's overall contribution to the accumulation of greenhouse gases.

(b) Operations

Project operations would require the consumption of energy and related generation of greenhouse gas emissions due to construction, vehicles-travel, consumption of electricity and gas, water conveyance and waste processing. The project includes many design features that would reduce the amount of such greenhouse gas emissions. The project's placement of high density housing within a regional center with nearby work, retail and entertainment opportunities as well as access to public transportation would contribute to numerous regional planning policies aimed at reducing vehicle miles traveled. Further, the

project would include many site specific measures that would support sustainability principles, and reduce the project's greenhouse gas emissions. The project design includes numerous design/LEED certification features to reduce emissions, as well as features that address strategies included in CalGreen, and LA Green Plan for reducing GHG emissions. These measures would be provided pursuant to and consistent with such policies and programs.

The evaluation of the project impacts addresses how well this project would support State-wide targets established pursuant to AB-32 and California Air Resources Board, which seek to reduce the amount of greenhouse gas emissions in 2020 by 28.4 percent from those that would occur under business as usual, without new actions to reduce such emissions. The project's design features would result in greenhouse gas emissions that are 34.6 percent less than what would occur under a business as usual scenario, thus exceeding the 28.4 percent standard. Therefore, the project would result in a less than significant impact with regard to GHG emissions.

(2) Cumulative Impacts

Although the State requires Metropolitan Planning Organizations and other planning agencies to consider how region-wide planning decisions can impact global climate change, there is currently no established non-speculative method to assess the cumulative impact of proposed independent private-party development projects. Expected reductions in greenhouse gas emissions are expected to come from independent private-party developments as well as other reductions associated with transportation, and patterns of population and employment distribution. Although development under a reduced density scenario results in lower GHG emissions from the use of a particular parcel compared to what is currently or hypothetically allowed (e.g., by creating fewer units and fewer attributable vehicle trips), total regional greenhouse gas emissions will likely fail to decrease at the desired rate or, worse, increase if regional housing and employment needs of an area are met with a larger number of less-intensive development projects. Therefore, it is not simply a cumulative increase in regional development or the resultant GHG emissions that threatens GHG reduction goals.

There exist numerous options for project developers to reduce their contribution to city-, county-, and State-wide greenhouse gas emissions, while helping to meet the region's future housing, jobs, and infrastructure needs. It is expected that other private development projects would include measures to reduce GHG emissions in compliance with applicable policies. Further, in addition to project specific items, there are CALGreen requirements that apply to all projects; and policies that address larger scale strategies such as reducing GHG emissions from automobiles, use of alternative fuels, performance standards for power plants, etc.

It is not possible at this time to accurately quantify GHG emissions expected from related projects or all of the GHG reductions anticipated from the above-discussed strategies. Because of the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that an emissions increase resulting from the project and related projects could actually cause a measurable increase in global GHG emissions sufficient to force global climate change. As indicated above, the proposed project would be consistent with State and City goals, and result in a greenhouse gas emission profile that reduces emissions 34.6 percent as compared to business as usual, exceeding the AB 32 reduction target of 28.5 percent reduction by 2020. Therefore, the project's contribution to cumulative GHG emissions would not be cumulatively considerable, and the project's cumulative impacts would be less than significant.

(3) Mitigation Measures

Construction and operational GHG emissions from the proposed project would meet AB 32 reduction targets. In addition, the project would be consistent with the *LA Green Plan* and the Green Building Ordinance. With implementation of the proposed project design features, project construction and operation would result in less than significant impacts. No mitigation measures are required.

(4) Level Of Significance After Mitigation

The project would not have significant impacts on GHG emissions and no mitigation measures would be required.

F. Hazards and Hazardous Materials

(1) Environmental Impacts

Historical use of the project site may present a concern as contamination may have occurred from the former Union Oil Company portable island that occupied the site in the 1930s, or the former Twentieth Century Fox Film Corporation stationary and print shop that occupied the site in the 1940s and 1950s. No agency records were found regarding these former uses. Therefore, Mitigation Measure D-1 is recommended in the event that contamination is found during excavation and grading. Project construction and operations would use typical construction and household products consistent with regulations for the protection of the public from hazardous materials.

The project site is located within a designated methane zone under the Los Angeles Methane Seepage Regulations and is therefore subject to soil gas testing and implementation of a methane mitigation system pursuant to the regulations. Mitigation Measures are proposed to ensure compliance with the City regulations, and to protect construction workers from methane exposure during the excavation of the project site.

The project site is located within the primary area of the instrument approach to the Santa Monica Municipal Airport and within the Visual Flight Rule (VFR) Traffic Pattern Airspace. As such, the Applicant would file the appropriate forms subject to the approval of the FAA to ensure that the project would not result in significant impacts relative to airport safety. As a result, compliance with FAA guidelines would reduce potentially significant impacts to a less than significant level.

(2) Cumulative Impacts

All development located within the vicinity of the project site would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the simultaneous development of the proposed project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

(3) Mitigation Measures

Mitigation Measure F-1: If visual or olfactory indication of contamination is discovered during excavation or grading on-site, such activities shall be temporarily halted and redirected around the area. The City of Los Angeles and appropriate regulatory agencies shall be

notified and the appropriate evaluation and response measures implemented so as to render the area suitable for excavation and grading activities to resume.

Mitigation Measure F-2: Prior to issuance of a building permit, the Applicant shall demonstrate compliance with Los Angeles Department of Building and Safety (LADBS) Methane Mitigation Standards for the appropriate Site Design Level pursuant to the City's Methane Seepage Regulations and to the satisfaction of the LADBS.

Mitigation Measure F-3: During subsurface excavation activities, including borings, trenching, and grading, Cal-OSHA worker safety measures shall be implemented as required to preclude an exposure to unsafe levels of soil gases, including but not limited to methane.

(4) Level of Significance After Mitigation

All potentially significant impacts would be less than significant, with implementation of the mitigation measure outlined above.

G. Hydrology and Water Quality

(1) Environmental Impacts

(a) Construction

Construction of the proposed project would involve site preparation activities including excavation and grading. Such activities would temporarily alter the existing drainage patterns and water flows within the project site. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the project would be required to obtain a National Pollutant Discharge Elimination System (NPDES) General Construction Activity Permit. In accordance with the requirements of the permit, the project would implement a Standard Urban Stormwater Mitigation Plan (SWPPP), which would specify BMPs and erosion control measures to be used during construction to prevent pollution. BMPs would include but not be limited to street sweeping and vacuuming, sand bag barriers, storm drain inlet protection, wind erosion control, and stabilized construction entrances and exits. These and other BMPs would eliminate or reduce pollutant levels in runoff during construction, consistent with regulatory requirements. In addition, the project would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Mitigation measures are proposed to ensure the implementation of such compliance.

(b) Operation

(i) Hydrology

The proposed project would alter the current vacant, pervious conditions of the project site with the proposed residential project, increasing the amount of impervious surface area on the project site. Water flows would run off impervious surfaces seeking outlet to the local drainage system. There are no known deficiencies within the storm drain system serving the project site.

The project includes a system of biofilter planters that collect rainwater and treat it prior to discharge. Therefore, the project would not alter the run-off rates at the project site, and the project's drainage system has been designed to accommodate expected 50-year flow volumes. General drainage patterns in the project area would not be altered and the stormwater collected on-site would be directed to the existing drainage system.

(ii) Water Quality

Runoff from the proposed project has the potential to contain pollutants such as nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, and trash and debris among other pollutants. The project proposes to include biofilter planters on-site to minimize the introduction of pollutants to the stormwater system. The proposed biofilter planters would be constructed pursuant to standards established by the City of Los Angeles Watershed Protection Division to assure treatment of contaminants without allowing seepage into the underlying soil. Further, the site would be subject to the City's standard BMPs for project operations.

(2) Cumulative Impacts

The proposed project and related projects would be subject to State NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop SWPPPs and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, cumulative impacts to hydrology and water quality would be less than significant.

(3) Mitigation Measures

The proposed project would be subject to the NPDES requirements, including preparation of and compliance with a SWPPP and compliance with SUSMP requirements. Compliance with these requirements, in addition to the project design features outlined above, would ensure that impacts to hydrology and water quality are reduced to a less than significant level. While the proposed project is not anticipated to result in any significant impacts to hydrology and water quality, the following mitigation measures are proposed to further ensure that such impacts would be less than significant.

Mitigation Measure G-1: Prior to the start of construction, a Notice of Intent (NOI) and Stormwater Pollution Prevention Plan (SWPPP) shall be prepared in order to fulfill the California SWRCB Order No. 99-08-DWQ, NPDES General Permit No. CA000002 (General Construction Permit) and the City of Los Angeles SUSMP requirements as well as comply with the Los Angeles County Department of Public Works 2006 Hydrology Manual.

Mitigation Measure G-2: The project shall comply with the requirements of the applicable National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge and with all applicable requirements of the Regional Water Quality Control Board (RWQCB), Environmental Protection Agency (EPA), and local agencies including the City of Los Angeles regarding water quality. As part of these requirements, the Applicant shall implement Standard Urban Stormwater Mitigation Plan (SUSMP)

requirements during construction of the project and shall prepare a Stormwater Prevention Pollution Plan (SWPPP) prior to construction of the project.

Mitigation Measure G-3: The project shall implement biofiltration planters to provide treatment with a first flush discharge of 0.75 inches, pursuant to review and approval by the Department of Public Works. The biofilter planters shall be inspected regularly and maintained to provide proper functioning. On-going maintenance and replacement of filters shall be provided by the property's management according to Operations and Maintenance plans consistent with City of Los Angeles Storm Water Maintenance Requirements.

Mitigation Measure G-4: All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as "NO DUMPING—DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.

Mitigation Measure G-5: The legibility of signs and stencils discouraging illegal dumping shall be maintained.

Mitigation Measure G-6: During operation of the project, materials used on-site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.

(4) Level of Significance After Mitigation

Impacts to hydrology and water quality would be less than significant. Furthermore, mitigation measures are proposed to ensure that such impacts would be less than significant.

H. Land Use

(1) Environmental Impacts

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

The proposed project would be subject to applicable policies of the Los Angeles General Plan Framework Element, the City of Los Angeles Planning Commission's Do Real Planning policies, the City of Los Angeles 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 of the applicable plan policies.

(b) Land Use Compatibility

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. 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. The residential use represented by the project would be consistent with other residential uses in the surrounding area and 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. 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.

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. 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.

(2) Cumulative Impacts

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. The related projects would include a variety of uses including residential, office, commercial, and hotel uses. 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.

Furthermore, development of the eight nearby related projects is expected to occur in accordance with City of Los Angeles and City of Beverly Hills adopted plans and regulations. 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.

(3) 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.

(4) Level Of Significance After Mitigation

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.

I. NOISE

(1) Environmental Impacts

(a) Construction Noise

(i) On-Site

Noise impacts would occur during project construction due to the operation of construction equipment such as loaders, backhoes, excavators, dozers, drill rigs, concrete pump trucks, pavers, water trucks, generators, etc. No blasting or impact pile driving would be used. Construction of the proposed project is estimated to last approximately three years, during which time noise levels due to construction would be of varying, intermittent durations and intensities. Noise impacts would be most noticeable at nearby sensitive receptors including the residential neighborhood located across Moreno Drive in Beverly Hills (in particular, the nearest residential units, directly across Moreno Drive) and Beverly Hills High School (in particular, the high school Science and Technology Center building that is located adjacent to the project site). The estimated noise levels would exceed the significance thresholds at the sensitive receptor locations, notwithstanding project design features to reduce such impacts, including the use of sound barriers.

(ii) Off-Site

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the project site throughout the project's construction period. While construction workers would arrive from many parts of the region, and thus different directions, haul trucks and delivery trucks would generally access the site via a planned route intended to minimize noise impacts to areas south and east of the project site. All heavy truck traffic would come from the west on Santa Monica Boulevard and enter and exit the project site at its northwest corner. By limiting the access to the site for heavy trucks/equipment to its northwest corner, all such traffic would avoid passing in the proximity of the sensitive residential and school uses located along Moreno Drive. Therefore, the off-site noise from such traffic would be less than significant.

(b) Construction Vibration

Project construction would generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The construction activities that typically generate the most severe vibrations, blasting and impact pile driving, would not be used for this project. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The level of vibration due to project construction would not exceed significance thresholds related to the protection of buildings from damage. The level would just slightly exceed the most conservative vibration thresholds related to human annoyance, and that occurring at just the nearest residential unit across Moreno Drive and at the high school Science and Technology Center. The level of vibration would also exceed the significance threshold for the use of highly vibration sensitive scientific equipment, should such equipment be used in class-rooms along the northern side of the Science and Technology Center. Such potentially significant impacts would occur only at those infrequent times when the equipment types that create the greatest impacts are operating along the edge of the project site nearest to the sensitive receptors. Mitigation measures are proposed to reduce such potentially significant impacts.

(c) Operational Noise

Operational project impacts to neighboring noise-sensitive receptor locations include noise that would be generated by off-site roadway noise, on-site mechanical equipment/point sources (i.e., loading dock and trash pick-up areas), parking facilities, outdoor recreation activities and rooftop helipad-related noise. Impacts due to project operations would be typical of those associated with residential development and would be less than significant. The greatest increase in sound levels due to project-related traffic noise levels would be a negligible 0.5 dBA. Mechanical equipment would be shielded and loading activities would occur along Santa Monica Boulevard, within the project structures and isolated from sensitive uses.

(d) Operational Vibration

The proposed project would include typical residential and commercial-grade stationary mechanical and electrical equipment such as air handling units, condenser units, exhaust fans, cooling towers, and electrical emergency power generators, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking facilities, on-site refuse/delivery truck activity, and on-site loading dock/refuse collection area activity. Vibration levels from these activities would be negligible and not felt at sensitive off-site locations.

(2) Cumulative Impacts

(a) Construction Noise

Noise from on-site construction activities are localized and would normally affect the areas within 500 feet from the individual construction site. None of the related projects are expected to contribute to a cumulative impact at the project site. However, three of the closest related projects could contribute to cumulative construction noise impacts at the noise sensitive receptors that are located between the identified related projects and the proposed project. Since the timing of the construction activities for related projects cannot be defined and are beyond the control of the City and the Applicant, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative.

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the proposed project, there is no potential for cumulative construction- or operational impacts with respect to ground-borne vibration.

(b) Operational Noise

The project site and surrounding area have been developed with uses that have previously generated, and would continue to generate noise from a number of community noise sources including vehicle travel, mechanical equipment (e.g., HVAC systems), and lawn maintenance activities. Each of the related projects that have been identified within the general project vicinity would also generate stationary-source and mobile-source noise as a result of ongoing day-to-day operations. The related projects are general residential, retail, commercial, or institutional in nature. Such uses are not typically associated with excessive exterior noise. While each project would produce traffic volumes that are capable of generating roadway noise impacts, the cumulative impact would be negligible, and less than significant. Due to LAMC provisions that limit stationary-source noise from items such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project.

(3) Mitigation Measures

(a) Construction

Construction-related noise has the potential to result in significant noise and vibration impacts at sensitive receptors. Project Design Features to reduce potential noise impacts include a 20-foot sound barrier wall adjacent to Beverly Hills High School on the south side of the project site, and a 12-foot sound barrier wall on the eastern side of the project site that faces the residential development across Moreno Drive. In addition, to the provision of the sound barriers, the following mitigation measures are proposed.

Mitigation Measure I-1: Exterior on-site construction activities shall be limited to Monday through Friday from 7:00 A.M. to 9:00 P.M.

Mitigation Measure I-2: The construction staging area shall be located within the project site.

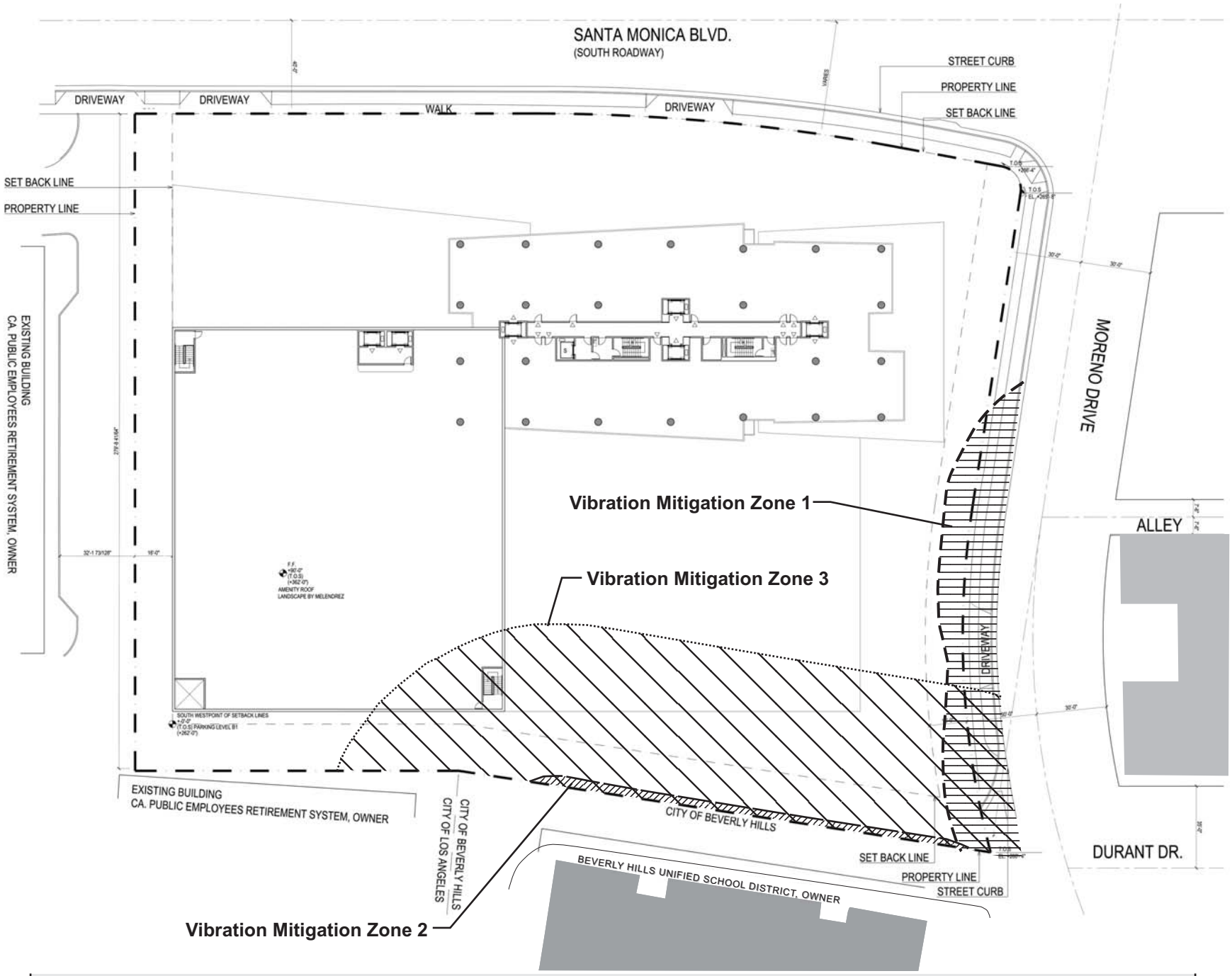
Mitigation Measure I-3: To avoid vibration impacts to the nearest residential unit to the project site, construction equipment within 75 feet of that unit (i.e. 15 feet within the project site) shall limit vibration equipment to machinery expected to generate no more than 85 VdB at 25 feet. (See Vibration Mitigation Zone 1 on **Figure I-1**, *Vibration Mitigation Zones,* on page I-33.)

Mitigation Measure I-4: The Applicant shall designate a construction relations officer to serve as a liaison with surrounding property owners including Beverly Hills High School. The liaison shall be responsible for responding to concerns regarding construction noise or vibration. The liaison's telephone number(s) shall be posted at multiple locations along the perimeter of the project site. In addition, the liaison shall coordinate with Beverly Hills High School administration in advance of, and throughout project construction to reduce disruption of class-room activities. The liaison shall work with the School administration to identify opportunities to reduce conflicts with school activities through work scheduling and the arrangement of construction activities on the project site.

Mitigation Measure I-5: To avoid vibration impacts on student activity in the Science and Technology Center:

a) High vibration construction activities shall be avoided within 35 feet of the Science and Technology Center (i.e. along the southern 10 feet of the project site facing that building) during class-room sessions, when school is in session. (See Vibration Mitigation Zone 2 on Figure I-1.)

b) If based on consultation with the administrator at Beverly Hills High School it is determined that highly sensitive equipment, e.g. microscopes, are in use at the Science and Technology Center, high vibration activities within 100 feet of that building shall be coordinated through consultation between the construction relations officer and the school administrator to reduce impacts at times of equipment use through scheduling, staging and equipment control of construction activities. (See Vibration Mitigation Zone 3 on Figure I-1.)



PCR

0 64 Feet

Vibration Mitigation Zones

10000 Santa Monica Boulevard

Source: Handel Architects, LLP; PCR Services Corporation, 2011.

FIGURE
I-1

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(b) Operation

Operation impacts at off-site receptors would be less than significant. Therefore, no mitigation measures are required for building operations.

(4) Level of Significance After Mitigation

(a) Construction

Mitigation Measure I-1 would preclude construction noise impacts from occurring during the noise-sensitive nighttime periods, or weekends. Mitigation Measure I-2 would avoid the noise impacts associated with construction activities that might otherwise occur off-site in the vicinity of sensitive uses. Mitigation Measure I-4 would specifically lessen project impacts during critical school activities; and would generally result in a lower overall noise profile due to construction activities. However, the significance thresholds would still be exceeded during times of more intense construction activity. Thus, short-term construction noise impacts would be significant and unavoidable.

Mitigation Measure I-3 would reduce vibration impacts at nearby residential development to levels that would be less than significant. Implementation of Mitigation Measures I-4 and I-5 would reduce potentially significant vibration impacts through modification of construction activities. As the vibration analysis is extremely conservative, representing atypical maximum events, and the mitigation measures would allow impacts to be reduced, it is expected that potential vibration impacts at the Science and Technology Center would be extremely limited. Notwithstanding, since the significance thresholds may be exceeded on occasion, it is conservatively concluded that impacts would be significant and unavoidable.

(b) Operation

The projects noise impacts to off-site sensitive uses during project operation are less than significant. No mitigation measures are required.

J.1. Public Services-Fire Protection

(1) Environmental Impacts

(a) Construction

Project construction would create a temporary increased demand for fire protection services. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Additionally, all project construction would comply with applicable existing codes and ordinances and fire suppression equipment specific to construction would be maintained on-site. Construction-related traffic on adjacent streets could potentially affect emergency access to the project site and neighboring uses; however, the impacts of such construction activity would be of short duration, on an intermittent basis, and controlled by project mitigation measures. Therefore, impacts regarding emergency access, and related safety would be less than significant.

(b) Operation

Fire Station No. 92 is located closest to the project site and would be the "first-in" station to respond to an emergency. The proposed project's net new residents could potentially generate 72 additional incidents per year, constituting a 1.1 percent increase in annual incidents. A 1.1 percent increase in annual incidents is relatively low, and would only slightly increase the demand on LAFD fire protection and emergency medical services. The incremental increase in demand resulting from the proposed project would not be substantial enough to require additional personnel at Fire Station No. 92 or other nearby stations and construction of an additional station or physical alterations to existing facilities would not be required. Nonetheless, Mitigation Measures are recommended to help reduce the number of incidents.

The project Applicant has been coordinating with LAFD during the development of the project design plans in order to ensure that emergency vehicles and equipment have adequate access to the project. In response to this coordination, a fire lane designed in accordance with LAFD requirements would be provided within the project site with access from Santa Monica Boulevard. Additional site access would be provided via Moreno Drive. A fire truck lane would be established at the eastern side of the project site, just outside the edge of the proposed cantilevered overhang. Water flow requirements would be sufficient to support the provision of fire hydrants required by the LAFD. Therefore, impacts regarding the provision of fire services would be less than significant. Notwithstanding, mitigation measures are proposed to ensure compliance with regulations and standards for the protection of the public safety.

(2) Cumulative Impacts

Eleven of the related projects are located within Fire Station No. 92's "first-in" district. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional fire protection and emergency medical services. Although a cumulative increase in LAFD fire protection services would occur, cumulative project impacts on fire protection and emergency medical services would be reduced through regulatory compliance, similar to the proposed project. It should also be noted that the project, as well as related projects would generate revenue to the City's general fund in the form of net new property tax, direct (i.e., from on-site commercial uses) and indirect (i.e., from household spending) sales tax, utility user's tax, gross receipts tax, real estate transfer tax on residential initial sales and annual resales, and other miscellaneous household-related taxes (e.g., parking fines). This revenue could be used to fund LAFD expenditures as necessary to offset cumulative impacts to LAFD fire protection facilities and services. Therefore, cumulative impacts on fire protection and emergency medical services would be less than significant.

(3) Mitigation Measures

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

Mitigation Measure J.1-1: Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features and other life-saving equipment (e.g., defibrillators) appropriate to the design of the project.

Mitigation Measure J.1-2: The project shall comply with all applicable State and local codes and ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the City of Los Angeles General Plan, unless otherwise approved.

Mitigation Measure J.1-3: Prior to the issuance of building permits, project building plans including a plot plan and floor plan of the buildings shall be submitted for approval by the Los Angeles Fire Department. The plot plan shall include the following minimum design features: location and grade of access roads and fire lanes, roadway widths, distance of buildings from an edge of a roadway of an improved street, access road, or designated fire lane, turning areas, and fire hydrants.

Mitigation Measure J.1-4: Prior to the occupancy of the proposed project, the Applicant shall install one on-site fire hydrant. The fire hydrant shall be subject to the approval of the Los Angeles Fire Department and Los Angeles Department of Water and Power.

(4) Level Of Significance After Mitigation

Implementation of the recommended mitigation measures and compliance with the LAMC Fire Code, the Los Angeles General Plan, the General Plan Safety Element, and all other applicable ordinances and requirements would ensure that the project's impacts on fire protection and emergency medical services are less than significant. Thus, no significant unavoidable impacts are anticipated.

J.2. Public Services-Police Protection

(1) Environmental Impacts

(a) Construction

There is potential for construction of the proposed project to create a temporary increased demand for police services. However, the impacts of such construction activity would be of short duration, on an intermittent basis, and would be coordinated with LAPD. Further, site safety measures would be implemented for the protection of the public. The perimeter of the project site would be surrounded by a 12-foot construction wall along the project boundary adjacent to Beverly Hills High School. All entry and exit points would be monitored during construction operations. A security guard would log all workers and vehicles into and out of the project site. Implementation of the project design features would help deter potential crime-related activity on-site and in the project vicinity during construction, thus reducing the demand on police protection services. Therefore, impacts to police protection services during construction of the proposed project would be less than significant.

(b) Operation

The project site is served by the West Los Angeles Community Police Station, which consists of approximately 214 sworn officers and 13 civilian employees. The residential component of the proposed project could potentially result in twenty eight additional crimes per year. This represents an increase of less than 0.2 percent of the crimes reported in the West Los Angeles Area.

The project would provide extensive security features on-site including provision of 24 hour video surveillance, 24-hour/7-day security personnel, controlled building and parking access, and implementation of a secure perimeter with a combination of fencing, lighting, and landscaping to prevent loitering or unauthorized access to the project site. The on-site security personnel would provide a deterrent and an on-site first responder capability for many security issues. Together, these security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries. Therefore, due to the minimal impact the proposed project would have on police protection services, the security personnel and features incorporated into the project and extra security patrols in Century City provided by the Century City Business Improvement District, the project would not result in demand for additional police protection services that would exceed the capability of the LAPD to serve the project site. The project would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Therefore, potential impacts to the capability of existing police protection services would be less than significant.

(2) Cumulative Impacts

Eighteen of the related projects that are anticipated to be developed within the vicinity of the project site are located within the West Los Angeles Community Police Station service area; and would contribute to the demand for police services. Projects located in other jurisdictions would be served by their respective police departments. However, related projects (particularly those of a larger nature) would likely be subject to discretionary review on a case-by-case basis by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Additionally, similar to the proposed project, related projects would generate revenue to the City's general fund that could be used to fund LAPD expenditures as necessary to offset the cumulative incremental impact on police services. Furthermore, larger projects would be likely to have on-site security personnel and safety features like those of the proposed project that would further reduce demand on police services. Therefore, cumulative impacts to the existing police protection services would be less than significant.

(3) Mitigation Measures

With incorporation of LAMC requirements, project design features, and mitigation measures set forth in Section IV.K, Transportation and Circulation, of this Draft EIR, impacts to police protection services during construction and operation of the proposed project would be less than significant. Therefore, no additional mitigation measures are required.

(4) Level Of Significance After Mitigation

The project would result in less than significant impacts to police protection services with the implementation of LAMC requirements, project design features, and recommended mitigation measures.

J.3. Public Services-Schools

(1) Environmental Impacts

Based on student generation factors provided by the LAUSD, the project is estimated to generate 32 elementary school students, 16 middle school students, and 20 high school students, for a total of 68 students. However, due to the anticipated demographics of the future residents of the project, the project's projected student generation is likely to be substantially less than that estimate.

Students generated by the proposed project would attend Westwood Elementary School, Emerson Middle School, Webster Middle School, and University High School. When the more conservative estimate of project-generated students is added to the projected seat availability at these schools, all school facilities serving the project site would be able to accommodate the new students with the exception of Westwood Elementary School. Westwood Elementary School would result in a shortage of 1 seat with the addition of the project, or a shortage of 31 seats below the 30 seat safety margin used by LAUSD for defining overcrowded schools.

(2) Cumulative Impacts

Eighteen of the related projects are located within the attendance boundaries of the schools serving the project site and are therefore included in the cumulative analysis. The proposed project in conjunction with related projects could generate 112 students at Westwood Elementary School, 103 students at Emerson Middle School, 58 students at Webster Middle School, and 96 students at University High School. Based on the 2013 – 2014 estimates provide by LAUSD, all school facilities would be able to accommodate these new students with the exception of Westwood Elementary School. Westwood Elementary School would result in a shortage of 81 seats or 111 seats below the 30-seat safety factor with the addition of the proposed project and related projects.

(3) Mitigation Measures

Implementation of the following mitigation measure would ensure that the project meets its obligation for the payment of school impact fees.

Mitigation Measure J.3-1: The project shall pay required school mitigation fees pursuant to Government Code Section 65995 and in compliance with SB 50 (payment of developer fees).

(4) Level of Significance after Mitigation

Impacts are less than significant; and no mitigation measures are required.

J.4. Public Services-Libraries

(1) Environmental Impacts

The proposed project's 283 dwelling units would generate approximately 379 new residents. The City of Los Angeles Public Library (LAPL) has identified the West Los Angeles Regional Branch Library, the Westwood Branch Library, the Robertson Branch Library, and the Palms-Rancho Park Branch Library as the libraries that would serve the project site. The West Los Angeles Regional Branch Library, the nearest to the project site, is currently adequately sized to accommodate the population residing in its service area; with an ability to accommodate an additional 5,853 residents. As a result, the project's 379 net new residents would only comprise 6.5 percent of the additional resident population that could be accommodated by the West Los Angeles Regional Branch Library. This represents a nominal increase in the demand at the West Los Angeles Branch Library and the library's existing service level would be able to be maintained without an additional library or alterations to the existing library. According to the LAPL, the populations being served at the other library facilities exceed the standards set forth in the 2007 Branch Facilities. Furthermore, project residents would be eligible to use the array of technical, arts, and general libraries on the UCLA campus, which is

located less than two miles from the project site. As a result, the proposed project would not exceed the population level required for new facilities.

The Beverly Hills Main Library, located approximately 1.2 miles from the project site, would also be available to serve residents of the proposed project. Given the proximity of the library to the project site, some project residents may also use this library. However, given the availability of other Los Angeles and regional libraries, the number of such library visitors would be negligible.

It should also be noted that the project would generate revenue to the City's general fund that could be used for the provision of public services such as library facilities. Also, Los Angeles voters, recognizing the need to provide adequate library services, recently approved Measure L. Measure L increases library funding gradually to 0.03 percent to keep libraries open longer and to improve library services; thereby providing LAPL a mechanism to address the needs of additional population.

Thus, the project would result in a nominal increase in the demand at library facilities serving the site and the project would not increase demand at library facilities serving the project site to the extent that a new library facility or alterations to an existing facilities would be required to maintain existing service levels. Impacts on library services would be less than significant.

(2) Cumulative Impacts

There are 20 related residential projects that would generate a population of approximately 3,759 people, increasing demand for library services. With the addition of the proposed project's estimated population of 379 residents, the total new residents would be 4,138 residents. To the extent that these residents would utilize only one of the area's library's, the cumulative residential growth would not be sufficient enough to result in the need for a new branch library at any of the libraries (i.e., the service area population would not exceed 90,000 residents at any of the area facilities). Residents would likely visit the library most convenient to them (including libraries available at the UCLA campus) and use would be spread across these various libraries so no one facility would be significantly impacted. Similar to the proposed project, related projects would generate revenue to the City's general fund that could be used to fund LAPL expenditures as necessary to offset the cumulative incremental impact on library services. Therefore, cumulative growth anticipated in the community, including the proposed project, would not cause a future population that would exceed the expected service population of libraries serving the project site.

(3) Mitigation Measures

Potential impacts to libraries would be less than significant. Therefore, no mitigation measures are required.

(4) Level of Significance After Mitigation

Potential impacts to library services and facilities as a result of implementation of the proposed project would be less than significant and no mitigation measures would be required. The proposed project, in conjunction with related projects, would not result in a significant cumulative impact to library services and facilities; therefore, no mitigation measures are necessary.

J.5. Public Services--Parks and Recreation

(1) Environmental Impacts

The proposed project's 283 dwelling units would generate approximately 379 new residents, increasing demand for park and recreation activity. To meet the project residents' need for park and recreation activities, the project would provide approximately 82,052 square feet (1.88 acres) of common open space and recreation area. This translates to a parkland-to-population ratio of 4.96 acres per 1,000 residents, thus exceeding both the City of Los Angeles long range and short/intermediate-range standards of 4.0 acres and 2.0 acres, respectively. The 82,052 square feet (1.88 acres) consists of approximately 70,720 square feet (1.62 acres) of common outdoor open space (ground-level open space and roof deck) and approximately 11,332 square feet (0.26 acre) of common indoor recreation area in the ancillary building. This level of open space and recreation service is substantially greater than the existing service levels of 0.70 acres of neighborhood and community parkland per 1,000 residents City wide, and 0.77 acres of neighborhood and community parkland per 1,000 residents in the West Los Angeles Community Plan area. The project's parkland-to-population ratio would also exceed the current Beverly Hills ratio of 2.24 acres of parkland per 1,000 residents.

The project's provision of open space would exceed the open space requirements established in Section 12.21 of the LAMC. Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. Pursuant to Section 17.12, 32 percent of the gross subdivision area would be required to be dedicated to the City of Los Angeles for park or recreational purposes. In the case of the proposed project, this would equate to a land dedication of 0.77 acre. Section 17.12.F of the LAMC allows private recreational areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication and/or in lieu fee requirement.

(2) Cumulative Impacts

Twenty related residential projects would contribute to increases in the need for additional parks and recreational facilities. The proposed project in conjunction with related projects could generate approximately 4,138 residents. However, all related projects with residential uses would be required to comply with the requirements of the Quimby Act, and LAMC Sections 12.21 and 17.12. As such, potential cumulative impacts to parks and recreational facilities would be reduced to a less than significant level.

(3) Mitigation Measures

Mitigation Measure J.5-1: In the event that the project's amenities do not provide sufficient credit against the project's land dedication and/or in lieu fee requirement, the Applicant shall do one or more of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees.

(4) Level of Significance after Mitigation

Potential significant impacts to park and recreational facilities associated with the proposed project would be reduced to a level that is less than significant via compliance with Mitigation Measure J.5-1.

K. Transportation and Circulation

(1) Environmental Impacts

(a) Construction

Given the level of traffic at some of the study intersections near the project site, the combination of haul truck and employee traffic could cause temporary adverse impacts at some intersections during the construction period. LADOT does not consider temporary construction impacts to be significant and project construction is expected to generate fewer trips than the project when in operation (which as discussed below, would have a less than significant impact). Further, construction impacts on traffic would be intermittent and of short-duration. Therefore, the project impact on traffic during the construction period is considered to be less than significant. Notwithstanding, mitigation measures are recommended to reduce construction impacts.

(b) Operation

(i) Intersection Impacts

The forty-two intersections most likely to be subject to project impacts were evaluated pursuant to procedures and thresholds established by LADOT and the City of Beverly Hills, as applicable. Twenty four of the study intersections are located within the City of Los Angeles, thirteen intersections are located within the City of Beverly Hills, and two intersections (Moreno Drive & South Santa Monica Boulevard and Moreno Drive & Durant Drive) are located on the borders of the Cities of Beverly Hills and Los Angeles. Of the 42 intersections, 32 currently operate at acceptable service levels (LOS D or better) during one or both peak periods. Ten of the intersections operate at lesser levels of service (LOS E or F) during one or both peak periods.

The proposed project is forecasted to generate 1,189 daily trips: 96 during the A.M. peak hour and 108 during the P.M. peak hour. After applying the City of Los Angeles and City of Beverly Hills significance impact criteria, it was determined that the proposed project's contribution to the roadway traffic would not result in any significant impacts to study intersections under existing plus project conditions. Therefore, no mitigation measures would be required.

(ii) Impacts on Neighborhood Streets

The analysis of traffic impacts on neighborhood streets addressed potential impacts at five nearby residential road segments. The analysis determined that there would be no increase in roadway traffic at two of the neighborhood segments: Robbins Drive east of Moreno Drive or Young Avenue east of Moreno Drive. With regard to the other three neighborhood road segments, the project is estimated to increase daily traffic on Durant Drive east of Moreno Drive by approximately 3.0 percent; increase daily traffic on Moreno Drive south of Durant Drive by approximately 3.9 percent; and increase daily traffic on Spalding Drive north of Olympic Boulevard by approximately1.7 percent. Further, the project is estimated to increase A.M. peak hour traffic on Durant Drive east of Moreno Drive by approximately 2.3 percent; A.M. peak hour traffic on Moreno Drive south of Durant Drive by approximately 3.4 percent; and increase A.M. peak hour traffic on Spalding Drive north of Olympic Boulevard by approximately 3.4 percent. Finally, the project is estimated to increase P.M. peak hour traffic on Durant Drive east of Moreno Drive by approximately 2.7 percent; P.M. peak hour traffic on Moreno Drive south of Durant Drive by approximately 3.3 percent; and increase P.M. peak hour traffic on Spalding Drive north of Olympic Boulevard by approximately 1.5 percent.

The increases in neighborhood traffic would not exceed City of Beverly Hills significance impact criteria, and therefore, the project would have a less than significant impact with respect this issue. Since neighborhood traffic on residential streets nearest the project site (which would be more likely than more distant neighborhood streets to be impacted) would be less than significant, increases in neighborhood traffic on residential streets farther from the project site would also be less than significant.

(iii) Regional Traffic Analysis

CMP Monitoring Stations

Two CMP arterial monitoring stations are located in the project study area. These include (1) the Wilshire Boulevard and Santa Monica Boulevard intersection and (2) the Westwood Boulevard and Santa Monica Boulevard intersection. The project is expected to add approximately five trips in the A.M. peak hour and three trips in the P.M. peak hour at Wilshire Boulevard and Santa Monica Boulevard and approximately 23 trips in the A.M. peak hour and 26 trips in the P.M. peak hour. Because the project is not expected to add more than 50 vehicle trips during the peak hours at either of these intersections, it would not exceed CMP threshold criteria.

Nevertheless, the CMP considers a project impact on a CMP arterial monitoring intersection to be regionally significant if the addition of project traffic increases the V/C ratio by 2 percent or more of capacity ($\geq$0.020) at an intersection projected to operate at LOS F (after the addition of project traffic). Because both intersections are expected to operate at LOS E or F this threshold criteria would apply. However, the project would not increase the V/C ratio by 2 percent or more at these intersections, and therefore would not have a regionally significant impact under the CMP.

CMP Freeway Monitoring Station

The project site is located approximately 2.25-miles to the east of the I-405 freeway and the nearest CMP freeway monitoring station is located at I-405 at Venice Boulevard. According to the trip generation estimates and trip distribution estimates, the project is expected to result in an increase of 10 trips in the morning and 11 trips in the evening peak hour on I-405, south of the Santa Monica Boulevard and an increase of approximately five trips in the morning and six trips in the evening peak hour on I-405, north of Santa Monica Boulevard. Since fewer than 150 trips would be added during the A.M. or P.M. peak hours in either direction at any of the freeway segments in the vicinity of the study area, no further analysis of the freeway segments is required for CMP purposes.

(iv) Public Transit

The proposed project is estimated to generate 14 transit trips during the A.M. peak hour and 16 transit trips during the P.M. peak hour. These transit riders would be distributed to the numerous bus lines and buses passing through on an hourly basis, resulting in a few added riders to any individual bus. These numbers of riders are not expected to represent substantial new riders in excess of existing capacity or to conflict with adopted plans or programs supporting alternative transportation. Therefore, impacts on public transit are expected to be less than significant.

(v) Access

The proposed project would provide three driveways, including two right-turn-only driveways along Santa Monica Boulevard and a full-access driveway (allowing both left and right turns for entering and exiting) on

Moreno Drive, approximately mid-block between Santa Monica Boulevard and Durant Drive. All three driveways would be non-signalized and stop-controlled. The Moreno Drive Driveway is proposed to be closed to vehicular access during weekday morning and afternoon peak periods to facilitate traffic access to/from Beverly Hills High School. The evaluation of service levels at the project driveways is based on potential peak hour delays. The traffic analysis indicates that the two driveway locations open during the weekday morning and evening peak period are projected to operate at acceptable LOS levels (LOS B and LOS C) under future with project conditions. Impacts with respect to driveway access would be less than significant.

(vi) Parking

The proposed Project would provide 708 parking spaces in a parking structure located adjacent to the residential building. The City Planning Department's "Residential Parking Policy for Division of Land – No. AA 2000-1," requires new residential condominium development to provide two spaces per unit plus 0.5 spaces per unit for guest parking in parking congested areas (the project area is considered to be "parking congested"), which would result in a requirement of 708 spaces. The project would provide 708 spaces and, therefore, would be consistent with the requirements of the City's "Residential Parking Policy," and respective LAMC requirements.

As indicated, this analysis evaluates the project parking provisions against requirements established in the City Planning Department's "Residential Parking Policy for Division of Land – No. AA 2000-1." This policy provides an elevated parking requirement beyond the parking requirements otherwise established in the LAMC to conservatively accommodate project demand for parking. Therefore, parking per the City requirements is expected to meet demand; and would not exceed the significance threshold standard. Impacts with respect to parking would be less than significant.

(vii) Pedestrian and Bicycle Access and Safety

Bicycle Access and Safety

Major streets in the project area, including Santa Monica Boulevard, Avenue of the Stars, and Wilshire Boulevard, provide a network of designated bicycle lanes. The location of a high-density residential use in the proximity of these routes would encourage bicycle activity. The development of two driveways on Santa Monica Boulevard and one driveway on Moreno Drive would not cause conflicts between driveways and respective bicycle lanes. In addition, the project would not allow on-street parking or other design features, such as line-of-sight obstruction, that would increase conflicts between cyclists and vehicles. Therefore, because the project would not result in a regular increase in bicycle/vehicle conflict, impacts with respect to bicycle access and safety would be less than significant.

Pedestrian Access and Safety

The proposed project would locate a high-density residential use within walking distance of a range of services, retail, restaurant, office, entertainment, hotel and other land uses and, as such, would increase pedestrian activity in the area. In addition, the project would improve the pedestrian environment by incorporating specific pedestrian amenities, such as landscaping visible from the street-level and a main entrance oriented to the Santa Monica Boulevard sidewalk. The project area has a mature network of crosswalks and pedestrian safety features, including signalized crosswalks on Moreno Drive. Sidewalks would include landscaped parkways that would separate pedestrians from the public street and, therefore,

enhance pedestrian safety. Driveways would feature pavement treatment that would visually cue pedestrians to potential vehicle crossings. Because the project would support pedestrian safety with landscaped parkways and well-marked driveway crossings, it would not result in a regular increase in pedestrian/vehicle conflicts. Therefore, impacts with respect to pedestrian access and safety would be less than significant.

In addition, the project's construction would be implemented under a Construction Management Program that would include numerous features for pedestrian safety, such as crossing guards, controlled truck access, use of flagmen, etc.

(viii) Consistency with Plans

The project would not result in significant impacts to the CMP arterial monitoring intersections or the CMP freeway monitoring locations. Thus, the project would be consistent with the CMP. Additionally, the proposed project would locate residential development in proximity to existing and future transit routes; would enhance the street frontage; and would not result in significant operational traffic impacts on any of the study intersections, residential street segments, or the freeway system, and thus, would be consistent with the West Los Angeles Community Plan goals to support public transit, encourage alternative modes of transportation, enhance bicycle routes, discourage non-residential traffic flow on residential streets, maintain safe and efficient street network, and maintain a desired level of service at all intersections.

The proposed project would be consistent with the policies of SCAG and other relevant agencies which encourage the use of transit, by locating a high-density residential use adjacent to the Santa Monica Boulevard transit corridor. The project would not conflict with the implementation of adopted transportation programs, plans, and policies; and as such, impacts would be less than significant.

(2) Cumulative Impacts

(a) Project Impacts under Cumulative Base Traffic Conditions

The estimates of cumulative (also known as future plus project) traffic growth for the study area intersections are based on regional ambient traffic growth and traffic generated by related projects in the vicinity of the project. Future study year conditions without the proposed project are known as "cumulative base conditions." During the morning and/or afternoon peak hours during cumulative base conditions in 2016, 23 of the 42 study intersections are projected to operate at LOS D or better. Nineteen of the intersections are projected to operate at LOS E or worse during one or both of the peak hours. The cumulative analysis indicates that, based on LADOT and Beverly Hills significance threshold criteria, the proposed project would not create significant traffic impacts at any of the analyzed intersections under cumulative plus project conditions.

(b) Impacts on Neighborhood Streets under Cumulative Conditions

As noted above, the project would not add new traffic at two of the neighborhood street segments: Robbins Drive east of Moreno Drive or Young Avenue east of Moreno Drive. The project increase compared to the cumulative base would increase future daily traffic on Durant Drive east of Moreno Drive by approximately 2.8 percent; increase daily traffic on Moreno Drive south of Durant Drive by approximately 3.7 percent; and increase daily traffic on Spalding Drive north of Olympic Boulevard by approximately 1.7 percent. The

project is estimated to increase future A.M. peak hour traffic on Durant Drive east of Moreno Drive by approximately 2.1 percent; A.M. peak hour traffic on Moreno Drive south of Durant Drive by approximately 3.2 percent; and increase A.M. peak hour traffic on Spalding Drive north of Olympic Boulevard by approximately 2.1 percent. The project is estimated to increase future P.M. peak hour traffic on Durant Drive east of Moreno Drive by approximately 2.5 percent; P.M. peak hour traffic on Moreno Drive south of Durant Drive by approximately 2.8 percent; and increase P.M. peak hour traffic on Spalding Drive north of Olympic Boulevard by approximately 1.3 percent.

These increases would not exceed City of Beverly Hills impact significance criteria for traffic impacts on neighborhood streets and, therefore, the project would have a less than significant impact with respect this issue. Since traffic on residential streets nearest the project site (which would be more likely than more distant neighborhood streets to be impacted) would be less than significant, any increases in future peak hour traffic on residential streets farther from the project site would also be less than significant.

(3) Mitigation Measures

(a) Construction

The following mitigation measures are proposed to ensure that construction-related traffic impacts relative to construction staging, construction parking, and Beverly Hills High School remain less than significant.

Mitigation Measure IV.K-1: Off-site construction truck staging shall not be located on a residential street. The haul route to and from the project site shall be as follows: Enter and exit the west side of the project site from Santa Monica Boulevard; and use Santa Monica Boulevard for transit to and from the I-405 Freeway. Trucks shall not be permitted to travel along other residential streets to the east and south of the project site nor along Moreno Drive south of Durant Drive adjacent to Beverly Hills High School.

Mitigation Measure IV.K-2: A flagman shall be placed at the truck entry and exit from the project site onto Santa Boulevard to control the flow of exiting trucks, to ensure that the exiting trucks do not turn onto Moreno Drive, and to coordinate the exiting trucks with the traffic signals at Moreno Drive and Santa Monica Boulevard.

Mitigation Measure IV.K-3: Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.

Mitigation Measure IV.K-4: During the school year, when construction is underway, trucks shall not be permitted to exit the site on Moreno Drive during peak drop-off and pick-up periods for Beverly Hills High School.

Mitigation Measure IV.K-5: Access shall remain unobstructed for land uses in proximity of the project site during project construction.

Mitigation Measure IV.K-6: Full-time lane closures are not anticipated for the project. Temporary lane closures, when needed, shall be scheduled to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. In the event of a lane closure, a

worksite traffic control plan, approved by the City of Los Angeles, shall be implemented to route traffic around any such lane closures.

Mitigation Measure IV.K-7: A construction management plan shall be developed by the contractor and approved by the City of Los Angeles. The construction management plan shall include the measures identified above, which mitigate construction-related impacts, and other measures as may be deemed appropriate. The construction management plan shall identify the locations of the off-site truck staging and off-site worker parking to be provided and shall detail measures to ensure that trucks use the specified haul route, do not travel through nearby residential neighborhoods, and are scheduled to minimize conflict with peak drop-off and pick-up times for the adjacent Beverly Hills High School.

(b) Operation

Based on the preceding analyses, traffic impacts on intersections, residential street segments, freeway system, public transit, driveway access, parking, pedestrian and bicycle safety, and consistency with plans would be less than significant. Therefore, no mitigation measures would be necessary.

(4) Level of Significance after Mitigation

Implementation of the above mitigation measures would reduce traffic impacts associated with construction activities. Further, construction impacts would be short-term, and intermittent. Therefore, construction impacts on traffic would be less than significant. The project would not result in significant operational traffic impacts. No mitigation measures are required.

L.1. Water Supply

(1) Environmental Impacts

(a) Construction

The demand for water supplies for construction activities such as soil watering, clean up, masonry, painting, and other related activities would be minimal; and would not be expected to have any adverse impact on available water supplies or the existing water distribution system. Therefore, impacts associated with short-term construction activities would be less than significant.

(b) Operation

Development of the proposed project would result in an increase in long-term water demand for operational uses, maintenance, and other activities on the project site. The proposed project is estimated to use approximately 58,139 gpd of water equating to 65.1 AF per year. The proposed project would implement project design features to reduce water consumption, and would be compliant with the City's recommended water conservation measures. The use of such water conservation features is not taken into account in the conservative analysis of the project's water consumption. Los Angeles Department of Water and Power (LADWP)'s 2010 Urban Water Management Plan (UWMP) provides water demand projections in five-year increments through 2035. According to LADWP, the City's water demand is estimated to reach 710,760 AF by 2035, which is an increase of 164,989 AF, or 30 percent, from the 2010 consumption. The 65.1 AF per year increase in water demand generated by the proposed project would constitute approximately 0.04 percent of the City's total increase in water demand through 2035, or approximately 0.01 percent of the

City's projected water demand for 2030 (710,760 AF). The proposed project would fall within the available and projected water supplies of LADWP's 2010 UWMP. Moreover, LADWP has stated they have water available to serve the proposed project and can supply water from the municipal system. The Applicant would be responsible for providing the necessary water infrastructure on the project site, as well as any extensions to connect the project site to existing water lines in the area. The proposed project would connect to the existing 12-inch water mains located along Santa Monica Boulevard. Given that LADWP would be able to meet the water demand of the project, as well as the existing and planned future water demands of its service area, impacts associated with long-term operation of the proposed project would be less than significant.

(2) Cumulative Impacts

(a) Water Demand

Eighteen of the related projects are located within the City of Los Angeles and thus within the service area of LADWP. The City of Beverly Hills has their own water service provider, and therefore, related projects within Beverly Hills were not included in this cumulative analysis. The project in conjunction with related projects would yield a total average water demand of approximately 793.389 gpd equating to 889.2 AF per year with the project. LADWP's 2010 UWMP projects yearly water demand to reach 710,760 AF by 2035, which is an increase of 30 percent from 2010 water demand. With the anticipated water demand increase of 793,528 gpd or 889.2 AF per year from the development of the proposed project and related projects, the demand for water would fall within the available and projected water demand of LADWP's 2010 UWMP.

The City of Los Angeles is faced with various ongoing challenges in securing its future water supplies due to among other things droughts, environmental restrictions, and climate change. However, in response to uncertainties regarding water supply, the Mayor and LADWP released a Water Supply Action Plan entitled "Securing L.A.'s Water Supply" dated May 2008. The plan calls for the City to meet this future increased demand through water conservation and water recycling. Furthermore, given that the UWMP plans and provides for water supplies to serve existing and projected needs, including those of future growth and development as may occur through related projects, and that the requirements of SB 610, SB 221 and SB 7 provide means to ensure that the water supply needs of large development projects are carefully considered relative to LADWP's ability to adequately meet future needs, it is anticipated that LADWP would be able to supply the demands of the proposed project and related projects through the foreseeable future. In addition, compliance with the City's recommended water conservation measures would reduce the water consumption estimates of the proposed project and related projects, thereby reducing the demand on City supplies. LADWP would have adequate amounts of water to meet future water demands for the service area with the addition of the proposed project and related projects, and no significant cumulative impacts related to water demand would occur.

(b) Water Infrastructure

Development of the proposed project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, each related project would be subject to discretionary review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, LADWP as well as the City of Los Angeles Department of Public Works conducts ongoing evaluations to ensure facilities are adequate. A new regulator station is currently funded with construction expected to be completed in June of 2012. This infrastructure

improvement will greatly enhance water service capacity for a multitude of new projects. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

(c) Global Warming and Water Supply

There are complex physical, chemical, and atmospheric mechanisms involved in global climate change that make it difficult to predict what the effects of global climate change will be, particularly at a State or local level. Due to this unpredictability, the secondary affects that global climate change may have on water supplies for a given region is even more difficult to predict. The science on global warming is still evolving and has not reached a point where it can be quantified and incorporated into delivery projections of the SWP. Furthermore, policy recommendations on how to incorporate potential changes to water supply due to climate change into water resource planning and management are still being developed. Therefore, consistent with studies prepared by DWR, it is considered premature to make an assessment of impacts under CEQA of how climate change will affect water availability for the project.

(3) Mitigation Measures

Based on the analysis above, the proposed project would not result in significant impacts related to domestic water supply. No further mitigation measures would be required.

(4) Level of Significance after Mitigation

As indicated above, the proposed project's impacts to water supply and infrastructure would be less than significant.

L.2. Wastewater

(1) Environmental Impacts

(a) Construction

Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

(b) Operation

(i) Wastewater Generation and Infrastructure

Based on wastewater generation factors provided by LADWP, the proposed project is estimated to generate approximately 55,352 gpd (0.055 mgd) of wastewater on an average day and approximately 94,098 gpd (0.094 mgd) of wastewater on a peak day. This estimate is conservative as the project's water conservation features would reduce the wastewater generation further.

The proposed project's wastewater would be conveyed via a new 250 foot long, 8-inch line to an existing 27-inch line on Century Boulevard East. LADWP has determined that the existing sewer infrastructure serving the project has sufficient capacity to serve the proposed project. The project would require construction of a new off-site line to meet to the sewer main-line in Century Park East. Mitigation Measure L.2-1, is included to ensure that the project infrastructure is consistent with the LADWP evaluation regarding capacity of the sewer network to meet project needs, and City regulations and standards for the provision of new sewer facilities.

(ii) Wastewater Treatment

The wastewater generated by the proposed project would ultimately be conveyed via the Hyperion Treatment Conveyance System to HTP. The average dry water flow for the Hyperion Treatment Conveyance System service area is projected to be approximately 492.3 mgd in 2015, and 511.5 mgd in 2020. These forecasted increases in wastewater flows without the proposed project are well within the current Hyperion Treatment Conveyance System capacity of 550 mgd. According to these projections and based on existing capacity, the Hyperion Treatment Conveyance System would still have a capacity of 58 mgd (or 10 percent) in 2015, and 39 mgd (or 7 percent) in 2020; without considering a 20 mgd increase in capacity to 570 mgd expected with implementation of the City of Los Angeles Integrated Resources Plan (IRP) improvements.

The proposed project's wastewater generation would contribute an average wastewater flow of 55,352 gpd (0.055 mgd) and a peak flow of 94,098 gpd (0.094 mgd). The amount could be easily accommodated within the projected available capacity. Furthermore, development of the project is consistent with the planned growth for the site under current zoning regulations. Therefore, development of the project site is within the anticipated growth projections taken into account by service providers such as LADWP. In addition, effluent conveyed to HTP would not have a significant affect on the Santa Monica Bay as HTP continually monitors all effluent, currently meets applicable water quality standards, and is required to comply with water quality standards established for beneficial uses. As such, the increase in wastewater flows generated by the proposed project would have a less than significant impact on wastewater treatment facilities.

(2) Cumulative Impacts

All of the 40 related projects in the project vicinity would cumulatively contribute, in conjunction with the proposed project, to the wastewater generation in the project area. The estimated generation for the proposed project and the related uses would be a combined total of approximately 851947.6 gpd (0.85 mgd). The peak flow for the proposed project and related uses is anticipated to be approximately 1,448,310 gpd (1.45 mgd). The cumulative projects would contribute less than one percent to the HTP flow. This wastewater flow is well within the capacity of the Hyperion Treatment Conveyance System.

HTP currently meets applicable water quality standards as set forth by the NPDES. As such, the cumulative projects' wastewater effluent discharged to the Santa Monica Bay would have a less than significant impact on water quality. Implementation of the IRP, upgrades in the advanced treatment processes at HTP, and continual monitoring by the EMD would ensure that effluent discharged into Santa Monica Bay are within applicable limits. As was the case with the proposed project, all related projects in the City of Los Angeles would be subject to LAMC Section 64.15 requiring a determination by LADWP that there is allotted sewer capacity available for each project. Therefore, cumulative impacts on the local sewer infrastructure would be addressed, with required sewer improvements, if needed. The proposed project would not involve the use of Beverly Hills facilities, and therefore the proposed project would not contribute cumulative impacts

on such facilities. For these reasons, the cumulative impacts of the project on wastewater services would be less than significant.

(3) Mitigation Measures

Mitigation Measure L.2-1: Prior to the issuance of building permits, the Applicant shall provide plans for the proposed project's sewer infrastructure and main-line hook-up to the City of Los Angeles Bureau of Engineering for approval regarding adequacy of capacity and consistency with City sewer regulations and design standards.

(4) Level of Significance After Mitigation

Upon implementation of Mitigation Measure L.2-1 above, the proposed project would result in less than significant impacts with regard to wastewater.

II. Project Description

II. PROJECT DESCRIPTION

A. INTRODUCTION

SM 10000 Property, LLC, (the Applicant) proposes to develop a residential project at 10000 Santa Monica Boulevard within the Century City community of the City of Los Angeles. The project would provide up to 283 luxury residential units in a residential building that would be up to 39 stories and approximately 460 feet in height. The project would also include a smaller ancillary building that would be directly accessible from the residential building. The ancillary building would be up to nine stories (90 feet in height), and would contain parking and recreation/site amenities for project residents. Parking for approximately 708 vehicles would be provided within one partially-subterranean level and above grade parking in the ancillary building. Upon completion, the project would include approximately 469,575 square feet of floor area. The project would also include a large amount of open space, with approximately 43,141 square feet of ground-level landscaping, mostly located in a large garden area on the south/eastern part of the site; and approximately 27,579 square feet of open space on a landscaped recreation deck on top of the ancillary building. The 43,141 square feet of ground level open space would comprise approximately 41 percent of the project site.

B. PROJECT LOCATION AND SURROUNDING USES

As shown in **Figure II-1**, *Project Location Map,* the 2.4-acre project site is located at 10000 Santa Monica Boulevard in the West Los Angeles Community Plan area of the City of Los Angeles, approximately 8.5 miles west of downtown Los Angeles and 6 miles northeast of the Pacific Ocean. More specifically, the site is located within the Century City community and is bound by Santa Monica Boulevard, a major transit-oriented arterial to the north and Moreno Drive to the east.[1] As shown in Figure II-1, the City of Beverly Hills is located to the immediate south and east of the project site.

Regional access to the site is provided by Interstate 405 (San Diego Freeway) located approximately 2.2 miles to the west, and Interstate 10 (Santa Monica Freeway) located approximately 2.2 miles to the south. Other major arterials in the vicinity of the project site include Wilshire Boulevard further to the north, Beverly Glen Boulevard to the west, and Olympic and Pico Boulevards to the south. The project site is also located along the route of the proposed Metro Purple Line that would link downtown Los Angeles with Westwood, via Century City. Three route options for the Purple Line are under consideration in the project area – two along Santa Monica Boulevard at Avenue of the Stars and at Century Park East and one at Constellation Avenue and Avenue of the Stars. This project is in the planning and public review phase and will be considered for approval following completion of a Final EIR that is currently under preparation.

The project site is located within the highly urbanized area of Century City. Century City has been designated, planned and serves as a high density regional center, which is well known for its commercial and

[1] *The project site is actually located on a northwest-southeast axis, with Santa Monica Boulevard to the northwest. Directions have been simplified for ease of reference, per typical understanding of the surrounding grid in which Santa Monica Boulevard and Olympic Boulevard are thought of as east-west arterials.*

entertainment activities and its residential and office high-rise towers. The areas to the south and west of the project site are generally characterized by mid- to high-rise office buildings, hotels, entertainment, and residential uses, including the 15- and 19-story Northrop Plaza buildings and the 27-story building at 1801 Century Park East. As shown in the aerial photograph provided in **Figure II-2**. *Aerial Photograph*, the Los Angeles Country Club Golf Course is located immediately north of the project site across Santa Monica Boulevard. The Beverly Hilton Hotel and the Robinsons-May property (9900 Wilshire Project) project are located across Santa Monica Boulevard in the City of Beverly Hills. These sites have been approved for new mixed-use development but the current status is pending. Commercial and residential uses are located immediately and further east of the project site across Moreno Drive. Beverly Hills High School, as well as a mid-rise parking structure are located immediately south of the project site. Located further to the south and southwest are mid- to high-rise office buildings and hotels, including the two 23-story Watt Plaza Towers, the 44-story Century Plaza Towers, the recently completed 40-story Century residential tower, and the Century City Center Project (previously approved for a 47-story residential development and currently proposed for a 37-story office building).

C. SITE BACKGROUND AND EXISTING CONDITIONS

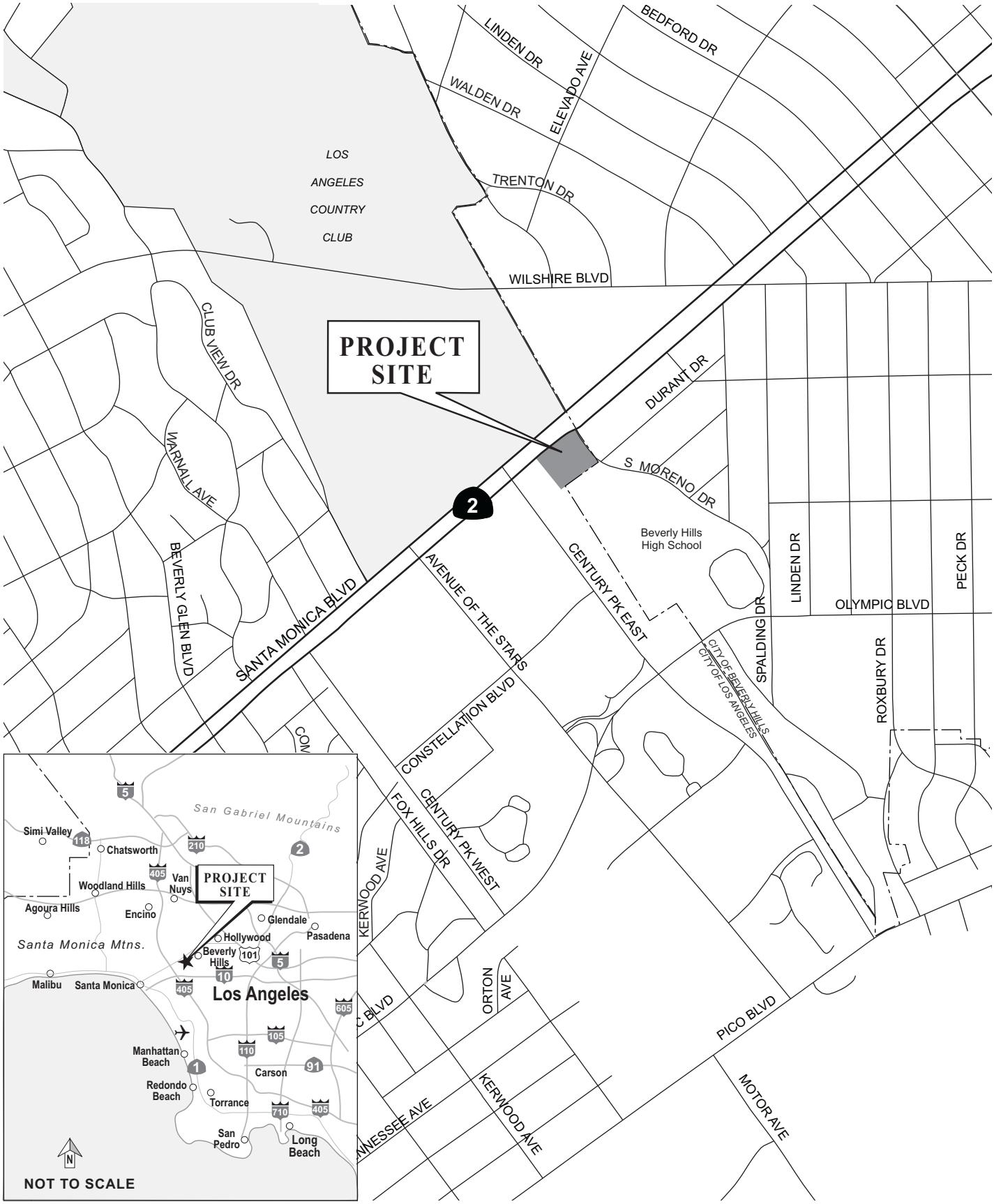
The project site consists of a rectangular, relatively flat, 2.4-acre parcel of land. The project site is currently vacant and has been graded and enclosed with construction fencing. Prior to 2006, the project site was occupied by office and restaurant uses, totaling over approximately 130,500 square feet with a separate above-ground parking structure.

D. PLANNING AND ZONING

The project site is designated for Regional Center Commercial uses within the City of Los Angeles General Plan and the West Los Angeles Community Plan. In addition, the project site lies within the Century City North Specific Plan (CCNSP) area and the West Los Angeles Transportation Improvement and Mitigation Plan (WEST LA TIMP) area. The site is zoned C2-2-O. The C2 portion of this designation indicates that the site is zoned for commercial uses (multi-family residential uses are also permitted within this zone). The second part of this zoning designation 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 indicates that the project site is within a Supplemental Oil Drilling District (O), indicating that there added zoning considerations pertinent to historic oil drilling activities that have occurred in the project vicinity. The CCNSP generally regulates development by assigning a certain number of trips to properties within the CCNSP area that establish the development rights. The project site has a recorded covenant and agreement that provides for 2,143.4616 Replacement Trips under the CCNSP.

E. STATEMENT OF PROJECT OBJECTIVES

Section 15124(b) of the CEQA Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the proposed project is "to develop higher density housing in Century City allowing convenient access by residents to jobs, retail services, entertainment, public transportation and freeways."



PCR

0 0.25 Miles

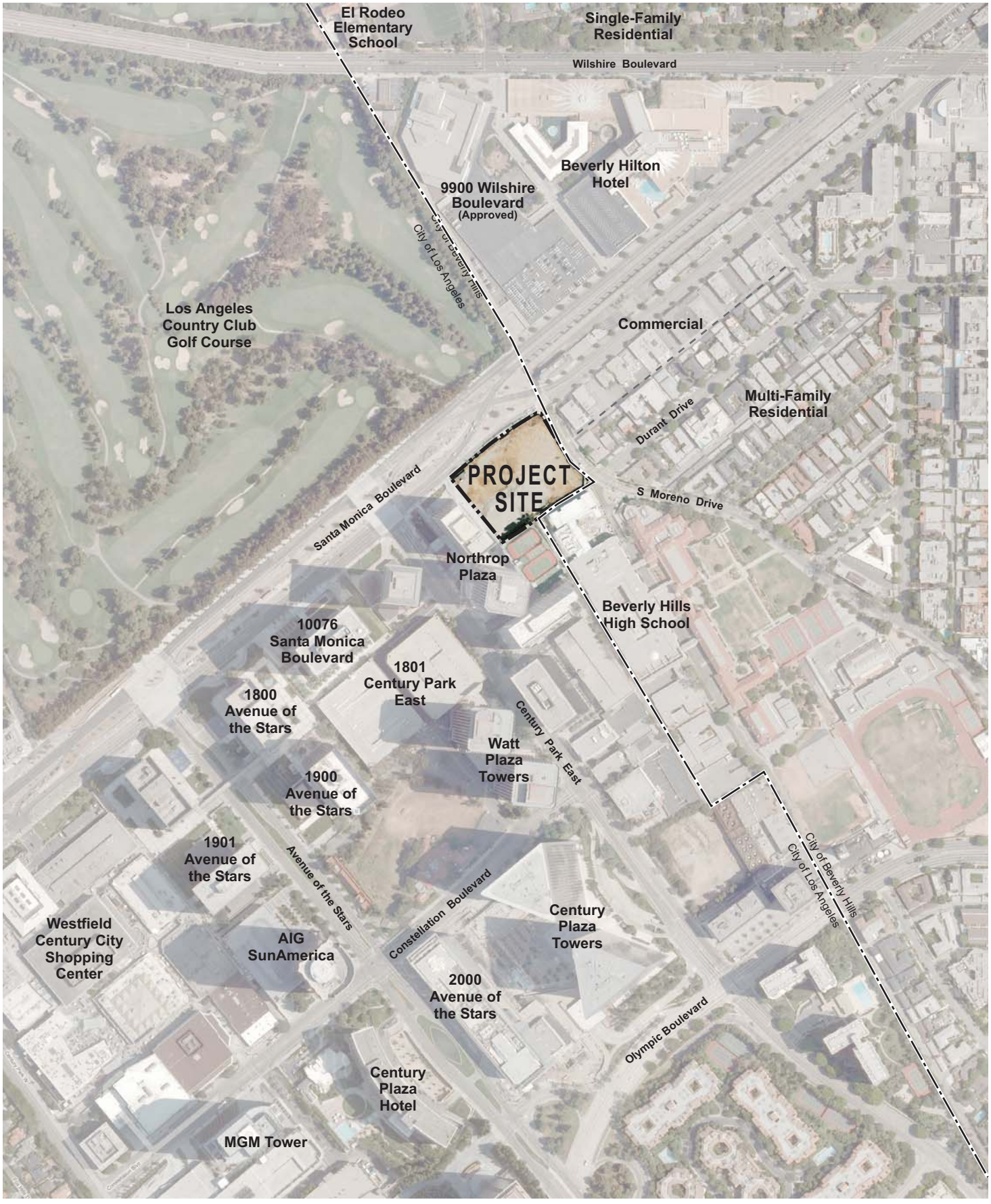
Project Location Map

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

II-1



PCR

N

0 500 Feet

Aerial Photograph

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

II-2

As set forth by the CEQA Guidelines, the list of objectives that the Applicant seeks to achieve for the project is provided below.

1. Support regional mobility goals by maximizing housing within an existing activity center with existing infrastructure to reduce vehicle trips and infrastructure costs, consistent with policies of SCAG, SCAQMD and California AB-32.

2. Provide high-density housing that contributes to the housing needs of the City, consistent with the development objectives of the West Los Angeles Community Plan.

3. Assist Century City in achieving its original vision of being a well-balanced, urban community in which people can "live, work, and play."

4. Maximize residential activity in the vicinity of the key public transit facilities serving the project site, including the numerous regional bus lines provided by six transit agencies and the proposed Metro Purple Line subway extension.

5. Maximize the residential support base for the retail and entertainment activities in Century City.

6. Improve street-level pedestrian connectivity and activity as called for in the 2007 Greening of Century City Pedestrian Connectivity Plan.

7. Build a distinctive structure at a key gateway to the Century City.

8. Create a secure, convenient, urban development with state-of-the-art recreation facilities and gardens to serve project residents.

9. Provide a substantial amount of open space on-site to provide buffering from public byways.

10. Incorporate sustainable elements of design, construction, and operation to meet the standards of Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council.

11. Maximize the site's in-fill development potential through the use of previously entitled Replacement Trips available at the project site.

12. Strengthen the economic vitality of the region by maximizing work for the construction industry.

13. Maximize future economic expansion by providing high density housing within a community that has the necessary infrastructure to support the development.

F. DESCRIPTION OF THE PROPOSED PROJECT

SM 10000 Property, LLC, (the Applicant) proposes the development of a residential project at 10000 Santa Monica Boulevard within the Century City community of the City of Los Angeles. The project would provide

up to 283 luxury residential units in a building with up to 39 stories and approximately 460 feet of height[2] and would provide parking and recreation/site amenities in an adjacent ancillary building up to nine stories (90 feet) in height. The project would also include a large amount of open space, mostly located in a large garden area on the south/eastern part of the site.

The project would include approximately 708 parking spaces, which would be provided within one partially-subterranean level and an adjacent ancillary building located toward the rear of the project site away from the Santa Monica Boulevard and Moreno Drive frontages. The parking would be provided by one of two options. Under the "Conventional Parking Option," the ancillary building would be up to nine stories above grade level. Under the "Automated Parking Option," as described further below, the size of the parking structure would be reduced from nine stories to four stories above grade. Other than the reduced height and floor area for the parking structure, all of the project features of the Conventional Parking Option and the Automated Parking Option are the same (i.e., same site plan, number of units, design of towers, etc.). Both parking options are evaluated in this Draft EIR.

The proposed project design features that are addressed in this EIR would become Conditions of Approval requiring their implementation as part of the project. A summary of the project's development components is presented and **Table II-1**, *Proposed Project Summary;* and a more detailed description of each of the project components is provided below. A conceptual site plan of the project is presented in **Figure II-3**, *Conceptual Site Plan.* Conceptual design simulations of the project are shown in **Figures II-4 through II-6**, *Conceptual Design Simulation – Larger Context*, *Conceptual Design Simulation – Project Site*, and *Conceptual Design Simulation – Ground Level*, respectively. Building sections are shown in **Figures II-7 and II-8**, *Building Sections – Conventional Parking Option*, and *Building Sections – Automated Parking Option*, respectively. Below grade parking plans are shown in **Figure II-9**, *Below Grade Parking Plans*.

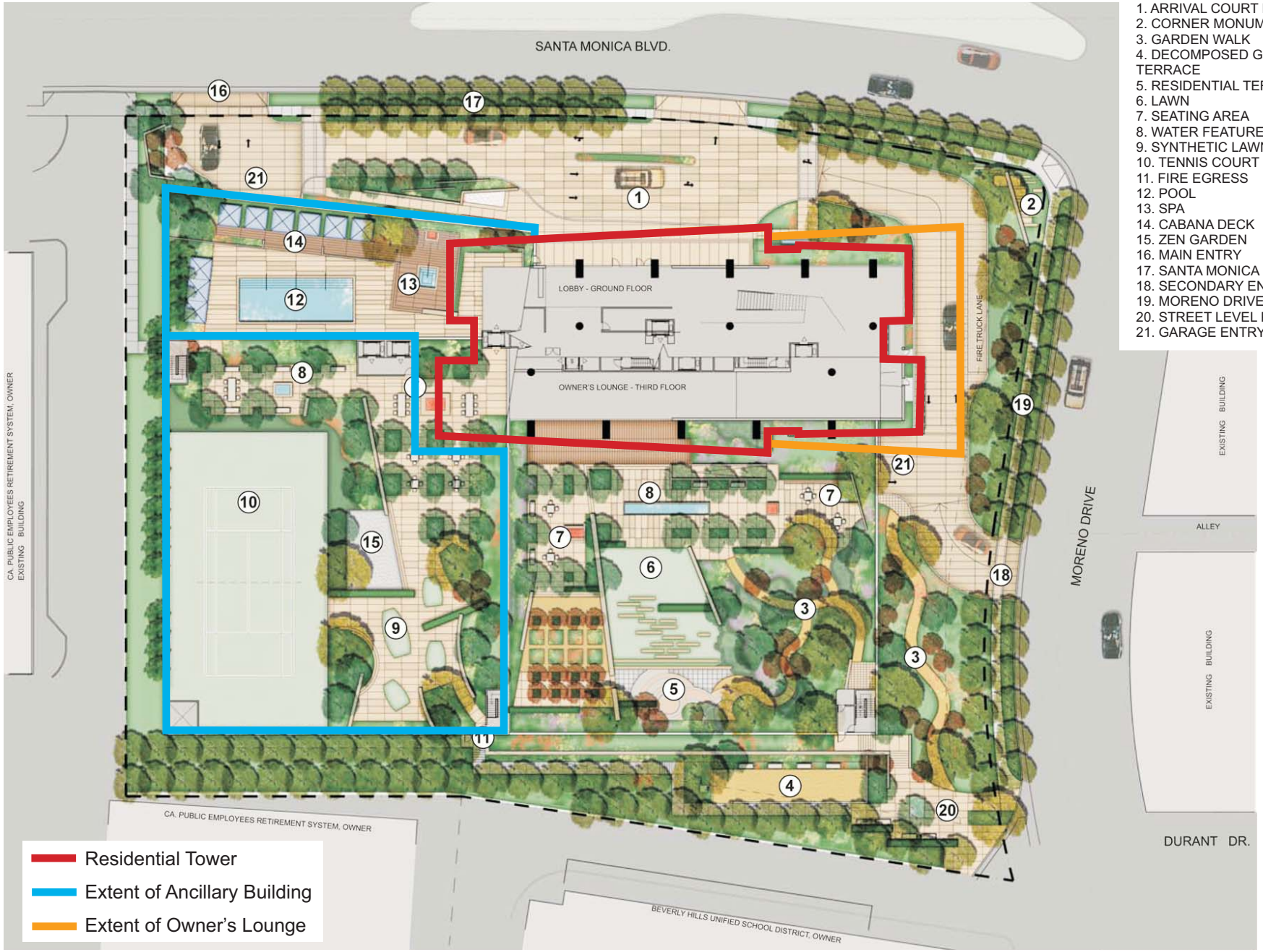
Table II-1

Proposed Project Summary

Land Use	Units/Square Feet
Residential Tower – Residential/Lobby/Owners Lounge	283 units/ 458,243 square feet
Ancillary Building – Recreation/Amenity	11,332 square feet
Total	**469,575 square feet**
Outdoor Open Space (Common and Private)	
Garden and Perimeter (Common)	43,141 square feet
Roof Deck (Common)	27,579 square feet
Terraces (Private)	30,300 square feet
Total	**101,020 square feet**
Parking	Approximately 708 spaces

Source: Handel Architects; Melendrez, 2011

[2] *As measured pursuant to City of Los Angeles Municipal Code. With mechanical rooms, which are not counted in calculating the height pursuant to the Municipal Code, the building would have a maximum height of 483 feet above the adjacent grade.*



1. ARRIVAL COURT DROP OFF
2. CORNER MONUMENT SIGNAGE
3. GARDEN WALK
4. DECOMPOSED GRANITE GARDEN TERRACE
5. RESIDENTIAL TERRACE
6. LAWN
7. SEATING AREA
8. WATER FEATURE
9. SYNTHETIC LAWN
10. TENNIS COURT
11. FIRE EGRESS
12. POOL
13. SPA
14. CABANA DECK
15. ZEN GARDEN
16. MAIN ENTRY
17. SANTA MONICA BLVD. STREETSCAPE
18. SECONDARY ENTRY
19. MORENO DRIVE STREETSCAPE
20. STREET LEVEL PLAZA
21. GARAGE ENTRY/EXIT

PCR

0 60 Feet

Conceptual Site Plan

10000 Santa Monica Boulevard

Source: Melendrez, 3/2011

FIGURE
II-3

PCR

Conceptual Design Simulation-Larger Context

10000 Santa Monica Boulevard

Source: Handel Architects LLP, 4/2011

FIGURE

II-4

PCR

Conceptual Design Simulation-Project Site

10000 Santa Monica Boulevard

Source: Handel Architects LLP, 2011

FIGURE

II-5

PCR

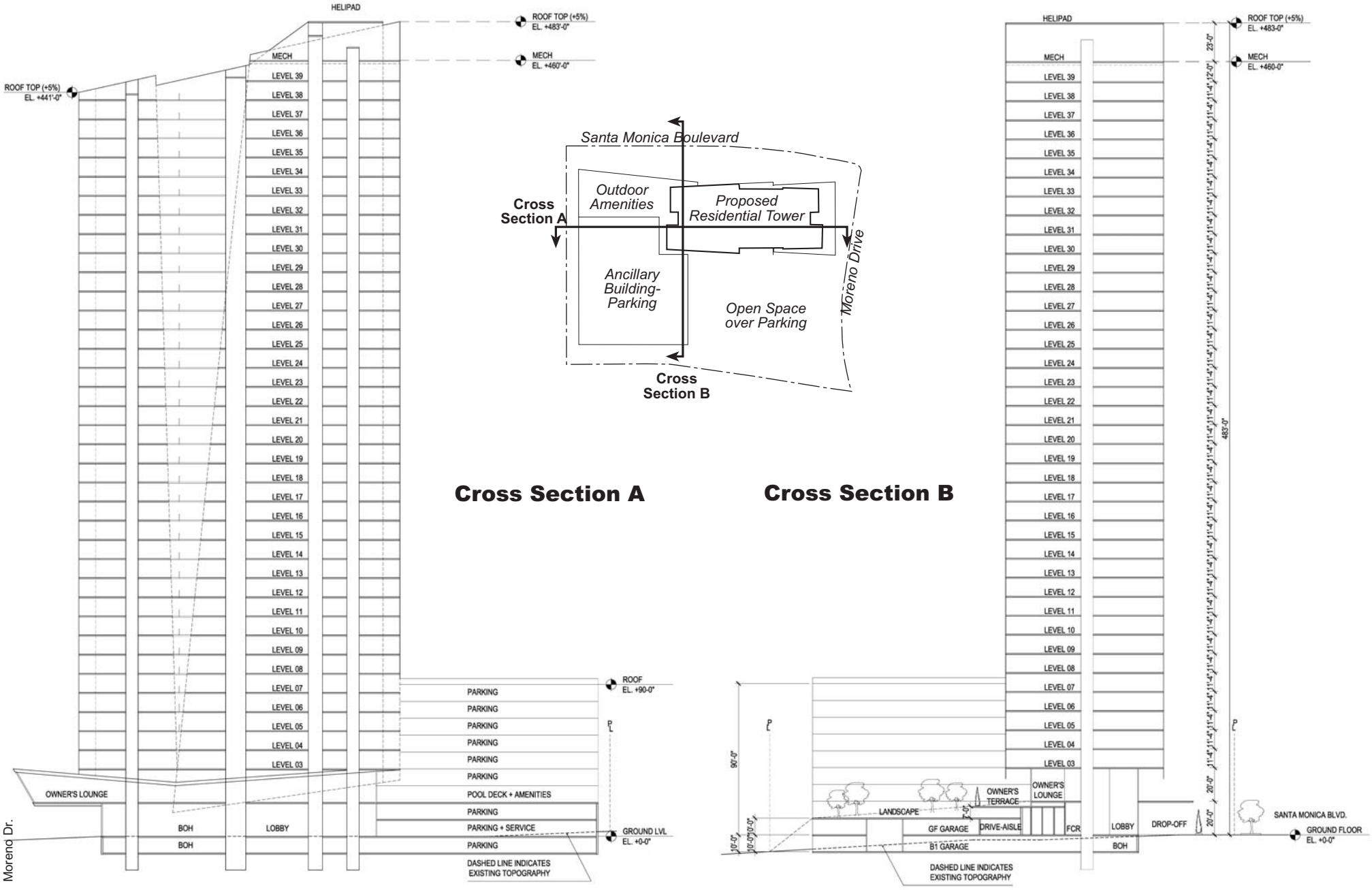
Conceptual Design Simulation-Ground Level

10000 Santa Monica Boulevard

Source: Handel Architects LLP, 2011

FIGURE

II-6



PCR

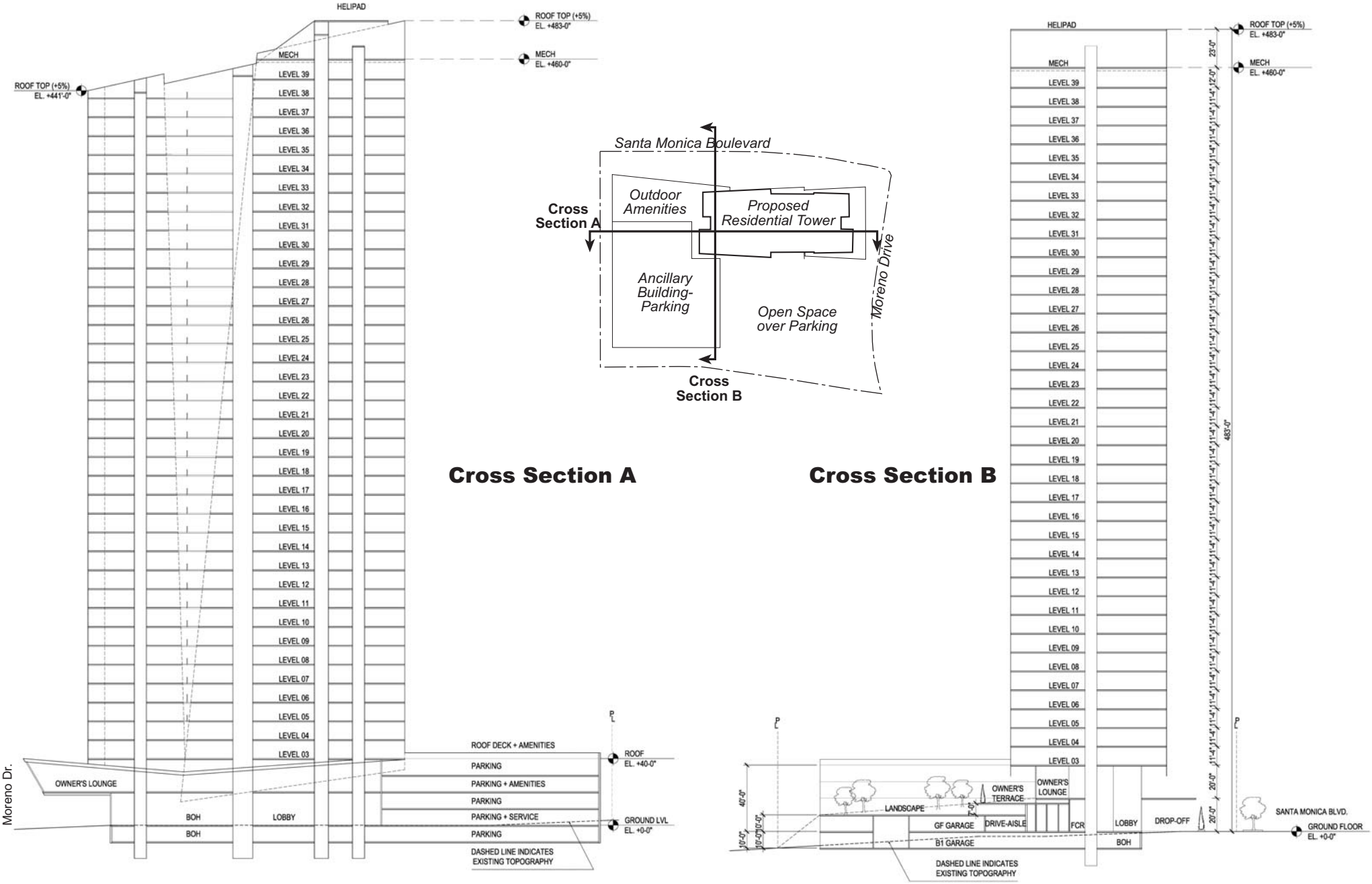
Building Sections - Conventional Parking Option

10000 Santa Monica Boulevard

Source: Handel Architects, 4/2011

FIGURE

II-7



PCR

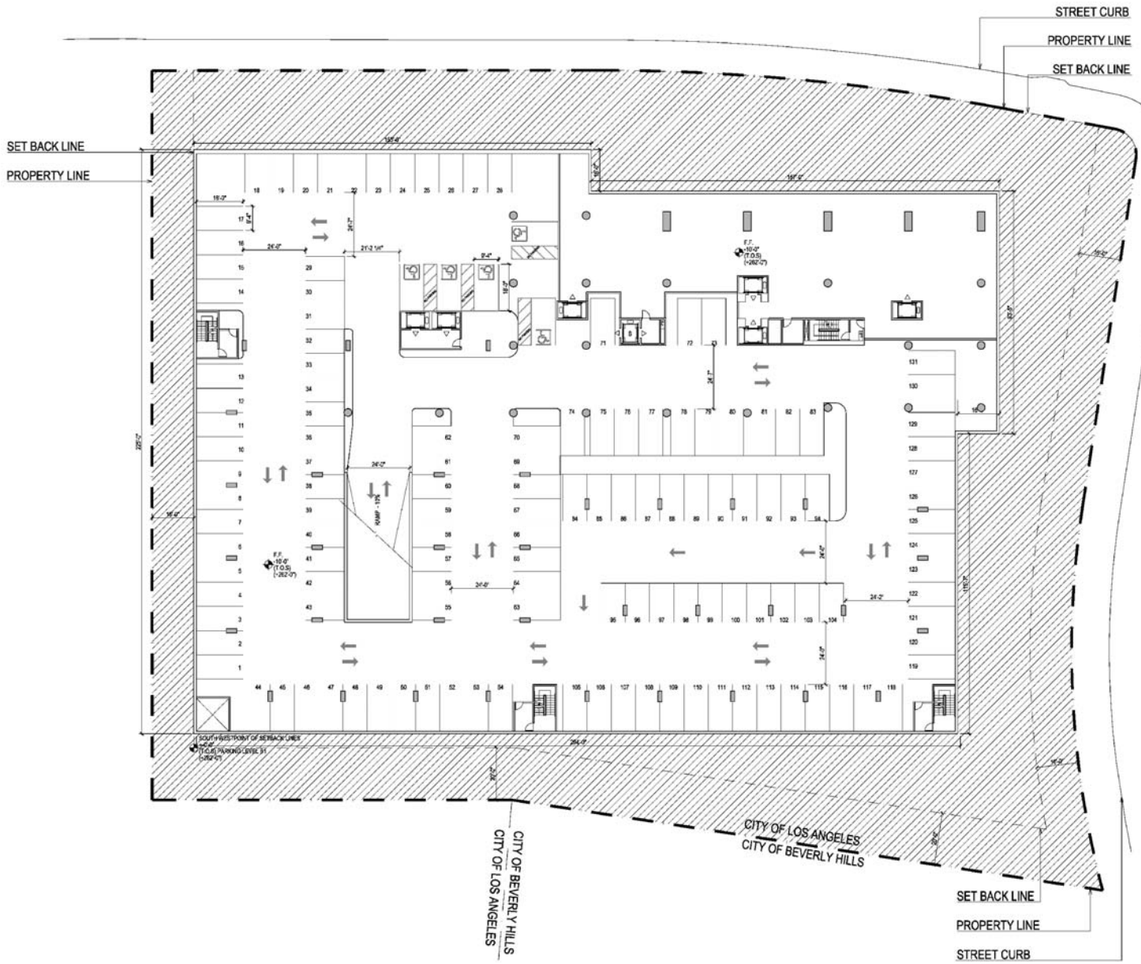
Building Sections - Automated Parking Option

10000 Santa Monica Boulevard

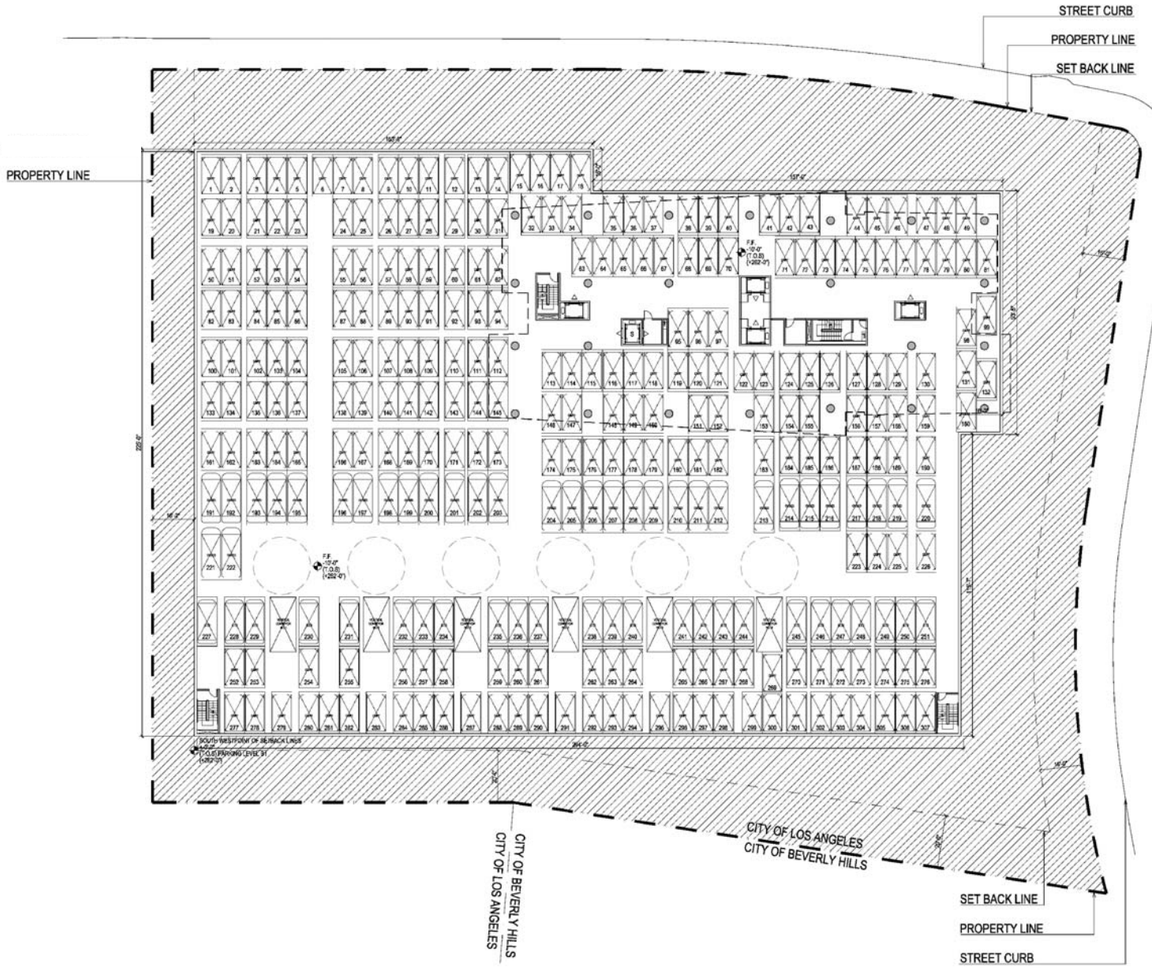
Source: Handel Architects, 4/2011

FIGURE

II-8



Conventional Parking Option



Automated Parking Option

PCR

N

Below Grade Parking Plans

10000 Santa Monica Boulevard

Source: Handel Architects, 4/2011

FIGURE

II-9

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1. Residential Tower

The residential component of the project would include 283 luxury residential units within a maximum 39-story building comprised of approximately 458,243 square feet. This building would be up to 460 feet above grade. As shown in Figure II-3 the building would be located within the northern portion of the site along Santa Monica Boulevard, with a main entryway and lobby facing Santa Monica Boulevard. The building has been located and designed to allow expansive views, while maintaining a large open space area between the adjacent residential community to the east and Beverly Hills High School to the south. Conceptual illustrations of the building's architectural style are shown in Figures II-4 through II-6. As indicated, the building would break away from the traditional corporate high-rise vernacular by basing the building design 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. Other building features include a 40-foot entry lobby and floor-to-ceiling glass windows in each unit opening onto private balconies. A cantilevered owner's lounge would add to the building articulation and help to define the buildings entryways. Building materials would include clear glass, fritted glass, metal panel, aluminum and stone. Fritted glass is a glass that is treated to provide some opacity, introduce design texture and reduce reflectivity.

2. Ancillary Building

The project would also include an ancillary building that would be up to nine stories (90 feet) in height to accommodate project parking and some of the project's site amenity/recreation facilities; the ancillary building would be four stories above grade (40 feet) in height under the Automated Parking Option (See Figures II-7 and II-8). Recreation facilities located in the ancillary building would include a large indoor lap pool and a landscaped roof deck with outdoor pool, sundeck, hot tub and tennis court facility. The ancillary building would be located toward the rear of the project site, away from the Santa Monica Boulevard and Moreno Drive frontages. The part of the ancillary building that fronts Santa Monica Boulevard would be lower in height – approximately 40 feet with the Conventional Parking Option and 20 feet with the Automated Parking Option. Ground level architectural treatments would be similar to those of the main residential tower continuing the vertically integrated fritted glass, metal and aluminum for continuity of design. The portions of this building above the roof-deck would be treated with draped/vertical landscaping such as vines.

3. Vehicle Access and Parking

As shown in Figure II-3 vehicle access to the project site would be provided via Santa Monica Boulevard and Moreno Drive with internal access drives connecting with the parking garage and valet area. The western access driveway from Santa Monica Boulevard would provide for two-way right-turn inbound/right-turn outbound traffic only, while the eastern access driveway to Santa Monica Boulevard would provide for one-way right-turn outbound traffic only. The Moreno Drive entry would provide for full right-turn and left-turn ingress and egress; however the driveway would be closed to vehicular access during weekday morning and afternoon peak periods to facilitate traffic access to/from Beverly Hills High School. A valet drop-off and pick-up area would be located within the northern portion of the site for use by residents and visitors. Additionally, service entry and exit would be provided via the western access driveway along Santa Monica Boulevard, connecting with an enclosed loading area, not visible to the street that would serve the residential building within the northwestern portion of the site. The design of the service area would permit trucks to turn around on-site before departing the project site.

The project would include approximately 708 parking spaces which would be provided within one partially-subterranean level and an above grade ancillary building. As indicated above, the parking would be provided under one of two project options: Under the Conventional Parking Option parking would be provided with one level of partially below grade parking and an additional nine floors of above grade parking. The parking arrangement within the parking structure would be similar to the standard arrangements commonly found in parking structures. (See Figure II-9.) The Automated Parking Option would be based on the provision of an "automated parking system." Automated parking systems provide parking in a manner that reduces space requirements, reduces air quality emissions and saves energy. With an automated system, vehicles are driven onto a platform at the garage entryway where car engines are turned off. Through the system, a robotic platform is then dispatched to the vehicle to lift it and convey it to a storage space. When the driver is ready to leave the site, a request for the vehicle is entered into a computerized system which conveys the vehicle from its storage location back to the parking garage entryway. If the automated parking option is implemented the area required for parking would be reduced, and the size of the ancillary building would be reduced from nine stories to four stories above grade.

4. Open Space and Landscaping

The project would also include a large amount of open space, with approximately 43,141 square feet of ground-level landscaping, mostly located in a large garden area on the south/eastern part of the site; and approximately 27,579 square feet of open space on a landscaped recreation deck on top of the ancillary building. The 43,141 square feet of ground level open space would comprise approximately 41 percent of the project site.

A landscape plan would be implemented as part of the project. The preliminary, landscape concept is illustrated in Figure II-3. The landscape plan would support the concepts presented in the 2007 Greening of Century City Pedestrian Connectivity Plan, by enhancing the quality of public thoroughfares and providing a design that is consistent with the overall landscaping concept for Century City. As shown in Figure II-3, mature trees, shrubs, and groundcover would be provided throughout the site. The project would provide street trees and decorative sidewalk paving improvements along Santa Monica Boulevard to improve street-level pedestrian connectivity and activity with a landscaped setback buffer between the sidewalk and the drop-off and pick-up area of the residential building. The Santa Monica Boulevard frontage would transition at the corner of Santa Monica Boulevard and Moreno Drive into a larger expanse of open space that would tie into the Moreno Drive frontage with mature specimen trees and dense planting to extend an overall garden feel from the project site out to the street. A drought tolerant plant palette would be used, which would include tree species such as California sycamores, Brisbane box trees, evergreen elms, and tipu trees; and shrubs and groundcover including succulents, ornamental grasses, carmel creeper, dwarf coyote brush, Manzanita, rosemary and agave species among others. Also, as indicated above, the visible façade of the parking structure, particularly under the Conventional Parking Option, would be treated with draped, vertical landscaping, such as vines to tie into the overall landscaped appearance of the site.

5. Lighting and Signage

Project lighting along the exterior façades of the buildings would consist of low-level lighting for architectural highlighting and security purposes. Any pole-mounted light fixtures located on-site or within the adjacent public rights-of-way would be shielded and directed towards the areas to be lit and away from adjacent sensitive uses. Project-related signage would be discrete, commensurate with the architecture and landscaping.

6. Site Security

The project would provide an extensive 24-hour/7day security program to ensure the safety of its residents and site visitors. Security measures, including controlled access, would be included as part of facility operations, staff training and building access/design to assist in crime prevention efforts and to reduce the demand for police protection services. Site security would include provision of 24-hour video surveillance and full time security personnel. Duties of the security personnel would include but would not be limited to assisting residents and visitors with site access; monitoring entrances and exits; managing and monitoring fire/life/safety systems; and patrolling the property. Project design also includes features to enhance site security including such items as lighting of entry-ways and public areas. The project would also incorporate numerous safety features during project construction to provide safety for the public, and in particular for students at the site-adjacent Beverly Hills High School. The additional construction phase features would include such items as fencing of the project site, highly controlled site access (with sign-in/sign-out); provision of crossing guards, and background checks of site workers.

7. Sustainability Features

The project would achieve several objectives of the City of Los Angeles General Plan Framework Element, Southern California Association of Governments Regional Transportation Plan, and South Coast Air Quality Management District Air Quality Management Plan for establishing a regional land use pattern that would promote sustainability. The proposed project would increase pedestrian activity in the Century City area, help to address housing needs and reduce vehicle trips and air pollution by locating residential uses within an area that has public transit (with existing regional bus service and planned subway service), and employment opportunities, restaurants and entertainment all within walking distance.

The project would be designed to meet the standards for Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council through the incorporation of green building techniques and other sustainability features. 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. Some of the project's key design features that would contribute to energy efficiencies include landscaped open space to avoid heat field affect and provide site shading, and the use of glass/window areas for ventilation and daylight accessibility. The project's proposed automated parking system, if implemented, would reduce consumption of non-renewable resources (construction materials), air emissions, and energy consumption. Other building features would include such items as stormwater 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, water conservation features; and recycling of solid wastes. The project would also be designed to comply with the City of Los Angeles Green Building Ordinance.

8. Anticipated Construction Schedule

Construction of the project is anticipated to begin in late 2012 or early 2013 with full occupancy expected by 2016. To provide for the new development, approximately 40,000 cubic yards of earth material would be excavated, including 11,000 cubic yards that would be exported off-site, 6,000 cubic yards that would be used as fill material to form the final site terrain and 23,000 cubic yards that would be removed and re-compacted on site to form a suitable base for the building foundations.

G. NECESSARY APPROVALS

It is anticipated that approvals required for the proposed project would include, but may not be limited to, the following:

- 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;
- 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.

III. General Description of Environmental Setting

III. GENERAL DESCRIPTION OF ENVIRONMENTAL SETTING

A. OVERVIEW OF ENVIRONMENTAL SETTING

The proposed project site consists of a rectangular, relatively flat, 2.4-acre parcel of land that is currently vacant and enclosed with construction fencing. The project site is located at 10000 Santa Monica Boulevard in the West Los Angeles Community Plan area of the City of Los Angeles, and within the boundaries of the Century City North Specific Plan (CCNSP). Century City has been designated, planned and serves as a high density regional center, which is well known for its commercial and entertainment activities and its residential and office high-rise towers. The areas to the south and west of the project site are generally characterized by mid- to high-rise office buildings, hotels, entertainment, and residential uses. The Los Angeles Country Club Golf Course is located immediately north of the project site across Santa Monica Boulevard.

The City of Beverly Hills is located to the immediate south and east of the project site, which includes commercial and residential uses east of the project site across Moreno Drive. Beverly Hills High School is located immediately south of the project site. The Beverly Hilton Hotel and the recently approved, Robinsons-May (9900 Wilshire) mixed-use project are both located northeast of the project site across Santa Monica Boulevard.

The project site is located at the intersection of Santa Monica Boulevard, a major transit-oriented arterial to the north and Moreno Drive to the east.[26] Regional access to the site is provided by Interstate 405 (San Diego Freeway) located approximately 2.2 miles to the west, and Interstate 10 (Santa Monica Freeway) located approximately 2.2 miles to the south. Other major arterials in the vicinity of the project site include Wilshire Boulevard further to the north, Beverly Glen Boulevard to the west, and Olympic and Pico Boulevards to the south. The project site is also located in the vicinity of alternative, proposed stations for the extension of the Westside Subway, Metro Purple Line, that would link downtown Los Angeles with Westwood, via Century City.

The following is a summary of the general environmental setting for each of the environmental topics analyzed in section IV of this Draft EIR. Refer to the topical discussions in Section IV for further discussion.

1. Aesthetics/Visual Resources

(a) Visual Character

The 2.4 acre project site is currently vacant and has been graded and enclosed with construction fencing. Santa Monica Boulevard running along the northern edge of the project site provides a strong visual boundary between the project site and the uses across Santa Monica Boulevard, which include the Los Angeles Country Club Golf Course across from the project site, and to the northeast in Beverly Hills the

[26] *The project site is actually located on a northwest-southeast axis, with Santa Monica Boulevard to the northwest. Directions have been simplified for ease of reference, per typical understanding of the surrounding grid in which Santa Monica Boulevard and Olympic Boulevard are thought of as east-west arterials.*

former Robinsons-May Department Store and surface parking lot, Beverly Hilton Hotel site which is proposed to be developed with the Beverly Hilton Revitalization project.

The project site is set amongst the office buildings, hotels, entertainment, and residential uses in Century City. The aesthetic character of Century City is dominated by high density development, and taller buildings, including e.g. the 15- and 19-story Northrop Plaza buildings adjacent to the project site on the west and a seven-story above-grade parking structure and a 15-story adjacent to the project site on the southwest. Other notable buildings in Century City include the twin 44-story Century Plaza towers, the 36-story MGM Tower, the 39-story AIG SunAmerica Building, the two 23-story Watt Plaza towers, and the 39-story Fox Plaza building, the recently constructed 40-story Century residential tower.

Century City's distinctive aesthetic features include landscaped setbacks, plazas, fountains, streetscape, and pedestrian bridges across Avenue of the Stars, a designated scenic highway. In addition, Santa Monica Boulevard between Sepulveda Boulevard and the City of Beverly Hills is listed as a Scenic Highway in the Table provided in Appendix E "Inventory of Designated Scenic Highways" of the General Plan, Transportation Element. However, no scenic features or resources for Santa Monica Boulevard are included in the Transportation Element.

The physical setting of Century City consists of rolling terrain, which is generally higher in elevation than adjacent areas to the north and south. Since the cluster of high-rise buildings in Century City is higher than the built environment of the surrounding area, and because the ground elevation of Century City is generally higher than the surrounding terrain, the predominant high-rise structures of Century City, which are visible from a great distance throughout the Los Angeles Basin, create a distinctive component of the West Los Angeles urban skyline. Thus, Century City's high-rise skyline is considered an aesthetic resource. Vantage points with views of Century City's high-rise profile include tall buildings or geographically higher areas. Areas free of immediate view obstructions such as public parks, golf courses, and other open space areas that have adequate setbacks also have views of Century City's skyline.

The City of Beverly Hills boundary runs along Moreno Drive, which forms the east boundary of the project site and, then, jogs behind the project site along a section of the project site's south boundary. The aesthetic character of the areas east and south of the project is of a built urbanized area, although of lower density than Century City. Beverly Hills High School located directly to the south of the project site has an appearance consistent with high school campuses. The nearest Beverly Hills High School building to the project site is the recently completed four-story, Science and Technology Building, a modern building that provides a boundary between the project site, and the older Beverly High School buildings. The area across Moreno Drive includes low density strip commercial uses facing Santa Monica Boulevard and a multi-family residential neighborhood.

(b) Light and Glare

Existing nighttime lighting within the project vicinity consists of streetlights and illuminated building signs, light spillage from high-rise buildings, security lighting, architectural lighting on building façades and in landscaped areas, and vehicle headlamps. Illuminated signage, including building identification signs and billboards or other types of advertising signage, and streetlights occur within commercial areas along the length of Santa Monica Boulevard to the east and west of the project site. Nighttime illumination is lowest in the area's single-family residential neighborhoods and opens space areas such as the Los Angeles Country

Club north of Santa Monica Boulevard. In the more immediate vicinity of the proposed project, sensitive uses with respect to artificial or nighttime light and glare are the residential neighborhoods located to the east of Moreno Drive and north and south of Santa Monica Boulevard. However, many of these areas maintain landscape lighting during the late hours for the purpose of maintenance and security.

Daytime glare is generally associated with reflected sunlight from buildings with highly reflective surfaces. Activities that would be sensitive to daytime glare from reflected sunlight include motorists traveling on the adjacent roadways and people working in adjacent offices. As the project site is vacant, no glare factors such as reflective glass, shiny surfaces, or metal or other reflective materials currently occur.

(c) Shading

The concentration of high-rise buildings within Century City creates a varying pattern of shadows that rotates in a sweeping arc within and beyond the boundaries of Century City toward the west, north, and east, according to the movement of the sun. Century City's shadows primarily extend beyond Century City into the surrounding area during the early morning and late afternoon hours throughout the year. The currently vacant project site causes no shading on any off-site uses. Shade sensitive uses in the area include residential neighborhoods north of Santa Monica Boulevard to the northeast, residential neighborhoods in the City of Beverly Hills to the east, and Beverly Hills High School to the south. Shade-sensitive recreational uses in the area include the Los Angeles Country Club golf course to the north.

2. Air Quality

The proposed project is located within the South Coast Air Basin (Basin), an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Basin, as the Basin is a coastal plain with connecting broad valleys and low hills.

The southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Basin, making it an area of high pollution potential.

The greatest air pollution impacts throughout the Basin occur from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season, and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in southern California.

Some population groups, including children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to air pollution than others. Sensitive land uses in close proximity to the project site include the following:

- Residential units east of the project site. Multi-family residences along Durant Drive and Robbins Drive, approximately 65 feet east of the project site, on the east side of South Moreno Drive.
- Beverly Hills High School. Senior High School located along the west side of South Moreno Drive adjacent to the southern edge of the project site.

3. Cultural Resources

The currently vacant project site was previously developed with office and restaurant uses, and an above-ground parking structure. Therefore, the upper ground areas have been disturbed. Disturbed fill on the project site is typically about 7.5 feet deep, but varies from 5 feet to as deep as 13 feet in the southeast corner of the project site. The project site is underlain by Quaternary Age Older Alluvium, which is the only sediment of the Holocene Epoch that would likely contain intact prehistoric cultural remains.

(a) Archaeological Resources

A review of survey data collected and evaluated indicates that no prehistoric or historic archaeological sites have been recorded on the project site and no unique or important prehistoric or historic archaeological resources have been encountered in the project vicinity. Five studies assessing archaeological resources have been conducted within a one-half mile of the project site. Of these studies, one included a surface survey for archaeological resources. One archaeological monitoring study was conducted just over one-half mile to the southwest of the project site. This study identified remains of the Twentieth Century Fox Film Corporation Studios dating between 1924 to 1935 at depths as deep as 20 feet below the modern ground surface.

(b) Paleontological Resources

Results of the paleontological records search indicate that no vertebrate fossil localities have been recorded within the project site, but localities have been recorded in the vicinity in the same sedimentary deposits, Quaternary Alluvium, that underlies the project site. The nearest vertebrate fossil locality in the Quaternary Alluvium, LACM 5501, is located south of the project site, south of Olympic Boulevard between Avenue of the Stars and Century Park East. This vertebrate fossil locality produced fossil specimens of pond turtle (*Clemmys marmorata*), dog (*Canis*), and horse (*Equus*) at a shallow but unspecified depth. Northeast of the project site, near the intersection of Wilshire Boulevard and Bedford Drive, there are two vertebrate fossil localities, LACM 3355 and LACM 3821, that produced specimens of fossil horse (*Equus*) and even-toed ungulates (*Artiodactyla*) both at a depth of 40 feet below the surface. Locality LACM 5833, west of the project site, just south of Wilshire Boulevard between Thayer and Westholme Avenues, produced fossils of horse (*Equus*), kangaroo rat (*Dipodomys*), wood rat (*Neotoma*), meadow vole (*Microtus*), and pocket gopher (*Thomomys*) at shallow but unspecified depths. Localities farther away in the older Quaternary sediments have also produced fossil specimens typical of the fauna from the Rancho La Brea asphalt deposits approximately 2.5 miles east of the project site.

(c) Native American Resources

The project site lies within the ethnographic territory of the Native American group known as the Gabrielino, a populous ethnic nationalities of aboriginal southern California. Gabrielino territory included the Los Angeles Basin, the coast of Aliso Creek in Orange County to the south to Topanga Canyon in the north, the four southern Channel Islands, and watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers. Their name is derived from their association with Mission San Gabriel Archangel.

No known traditional burial sites or other type of cemetery usage has been identified within the project site. However, the NAHC did indicate the presence of Native American cultural resources in the project vicinity. The tribal representative of the Gabrielino Tongva Indians of California Tribal Council located in Culver City, California stated that based on tribal and oral history, the vicinity of Century City along Santa Monica Boulevard is sensitive for cultural resources. He also noted that Native American burials had recently been identified along the "older route of the railroad". Furthermore, the tribal representative noted the existence of natural springs that the tribe used prehistorically in the vicinity of the project site. Consequently, he indicated that Native American cultural resources may be present within the project site at depth.

4. Geology/Soils

The project site is located within the Los Angeles Basin, a coastal plain between the Santa Monica Mountains to the north, the Puente Hills and Whittier faults to the east, the Palos Verdes Peninsula and the Pacific Ocean to the west, and the Santa Ana Mountains and San Joaquin Hills to the south. The Basin is underlain by a deep structural depression, which has been filled by both marine and continental sedimentary deposits, which rest on a basement complex of igneous and metamorphic composition. Within the Basin, Pleistocene and Holocene Age alluvial deposits are underlain by marine and continental sediments. These deposits generally consist of fine- to coarse-grained poorly graded sand with silt, silty sand, sandy silt and silt with varied amounts of gravel. The soils are primarily slightly moist to moist and medium dense to very dense or firm too hard, and become denser with increased depth.

The project site is located within the seismically active region of Southern California, which is crossed by numerous active and potentially active faults. The closest known active faults to the site are the Newport-Inglewood and Santa Monica Faults. There are no active faults that cross the proposed project site. Peak Ground Accelerations (PGA) at the site for the Maximum Considered Earthquake is estimated to be 0.5g.

The project site and surrounding area are relatively flat with no pronounced highs or lows. No distinct or prominent geologic or topographic features are located on the project site such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands.

Subsurface materials at the project site consist of Quaternary Age Older Alluvium below variable amounts of fill. The fill consists of fine to coarse-grained silty and gravelly sand with minor amounts of clay and occasional concrete fragments. The fill on site is typically approximately 7.5 feet deep, but it varies from five feet to as deep as 13 feet in the southeast corner of the site. The alluvium consists of admixtures of gravel, sands, silts, and clays which vary from light to dark browns, grays, tan greenish-gray, orange-brown, and occasional red-brown.

The alluvium at the subject site is considered competent and not subject to liquefaction or earthquake induced ground deformation. The near-surface soil possesses low to moderate expansive characteristics based upon expansion index testing and field soil classifications; and the consolidation and hydrocollapse potential of the older alluvium is low to moderate.

5. Greenhouse Gases Emissions

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to anthropogenic (human) GHG emissions is currently one of the most important and widely debated scientific, economic and political issues in the United States and the world. The extent to which increased concentrations of GHGs have caused or will cause climate change and the appropriate actions to limit and/or respond to climate change are the subject of significant and rapidly evolving regulatory efforts at the federal and state levels of government.

GHGs are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. GHGs include CO2, methane (CH4), ozone (O3), water vapor, nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). Carbon dioxide is the most abundant GHG in the atmosphere. GHGs are the result of both natural and man-made activities, with the primary sources of emissions being transportation, consumption of fossil fuels for power generation, industrial processes, forest fires, decomposition, landfills, and heating and cooking. According to the California Air Resources Board, some of the potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years.

In response to growing scientific and political concern regarding global climate change, in the last decade California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State. Most notably, the enactment of AB 32 commits the State to achieving the following: 2000 GHG emission levels by 2010, which represents an approximately 11 percent reduction from emissions as the result of "business as usual," 1990 levels by 2020, and 80 percent below 1990 levels by 2050.

At the local level, the City of Los Angeles, in May 2007, published Green LA, an Action Plan to Lead the Nation in Fighting Global Warming (LA Green Plan), outlining the goals and actions to address the goal of reducing emissions of CO2 to 35 percent below 1990 levels through increases in the generation of renewable energy; improvement of energy conservation and efficiency; and changes in transportation and land use patterns to reduce dependence on automobiles. Further, in April 2008, the City adopted a green building ordinance to address the impact on climate change from new development.

6. Hazards and Hazardous Materials

The project site is currently vacant and has been graded and enclosed with construction fencing. No hazardous materials are located on-site. Due to the project site's location within the Beverly Hills Oil Field, the project site is located within a City-designated methane zone. According to Division of Oil, Gas, and Geothermal Resources (DOGGR) Map 117, no oil wells are located directly on the project site. The closest oil well, Chevron U.S.A. Inc. "Wolfskill" 1, is located south of the project site. This oil well is plugged and abandoned. There are no leaking underground storage tanks or other hazardous material conditions/incidents in the immediate site vicinity that would have effects on the project site.

7. Hydrology and Water Quality

(a) Hydrology and Groundwater

The project site lies within the 130-square mile Ballona Creek Watershed, which is bound by the Santa Monica Mountains on the north, State Highway 110 (Harbor Freeway) to the east, Baldwin Hills to the south, and the City of Santa Monica to the west. Within this watershed, stormwater that does not percolate into the ground is directed via storm drains into the major tributaries of the Ballona Creek Watershed including Centinela Creek, Sepulveda Canyon Channel, and Benedict Canyon Channel. The Ballona Creek Watershed eventually discharges into Santa Monica Bay.

The project site consists of a relatively flat, 2.4-acre parcel of land. The project site is undeveloped (vacant) and graded with pervious surfaces comprising approximately 100 percent of the site. During a 50-year storm event, the existing runoff rate at the project site is approximately 8.0 cubic feet per second (cfs). Stormwater generally flows via sheet flow to the southeast corner of the project site where it enters a 20 by 14 foot reinforced concrete box storm drain located along Moreno Drive. However, a portion of the stormwater from the project site also enters an 84-inch storm drain located along Santa Monica Boulevard. These storm drains are part of the Benedict Canyon drainage system within the Ballona Creek Watershed which eventually discharges into Santa Monica Bay. Stormwater within the 84-inch storm drain flows in an easterly direction to Moreno Drive where it junctions with the reinforced concrete box that directs the flows south along Moreno Drive. There are no known deficiencies within the storm drain system serving the project site.

(b) Surface Water Quality

Existing stormwater runoff from the project site has the potential to contribute suspended solids, sediments, trash and debris to the stormwater conveyance system. Stormwater from the project site is currently not treated prior to entering the storm drain system.

8. Land Use

(a) Project Site

The vacant 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 such, the project lies within and is an integral component of Century City, a planned community that 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. Century City is a high density

regional center with a mix of residential, commercial and entertainment uses, located approximately 8.5 miles west of downtown Los Angeles and six miles northeast of the Pacific Ocean.

The project site is designated as Regional Center in the Los Angeles General Plan Framework, and as "Commercial" under the West Los Angeles Community Plan. The project site is also located within the Century City North Specific Plan (CCNSP) and the West Los Angeles Transportation Improvement and Mitigation Specific Plan (West LA TIMP) Area. 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, which permits a wide range of uses, including multi-family residential uses consistent with the R4 development standards. 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 6:1. 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.

(b) Surrounding Uses

Century City is a highly urbanized area characterized by distinctive mid- and high-rise buildings. The areas of Century City to the west and southwest of the project site include office buildings, hotels, entertainment, and residential uses. The 15- and 19-story Northrop Plaza buildings are located adjacent to the project site to the west and a seven-story above-grade parking structure and a 15-story building at 1880 Century Park East are located adjacent to the project site to the southwest. Other notable buildings in Century City include the twin 44-story Century Plaza towers, the 36-story MGM Tower, the 39-story AIG SunAmerica Building, the two 23-story Watt Plaza towers, the 39-story Fox Plaza building, the recently constructed 40-story Century residential tower. The 39-story 10131 Constellation Boulevard Towers have also been approved; as well as the approved, future New Century project at the Westfield Shopping Center to the west which includes improvements to the shopping center and a 39-story residential tower.

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, across 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. The land uses to the east of Moreno Drive are also located in the City of Beverly Hills. These land uses 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.

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;" however, this site was recently sold and the future use of the site is currently unknown.

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

9. Noise

The predominant noise source surrounding the project site is roadway noise from the Santa Monica Boulevard to the north and Moreno Drive to the east. Secondary noise sources including commercial/retail-related activities along Santa Monica Boulevard, such as loading dock/delivery truck activities, trash compaction, parking garage, and refuse services activities.

Existing uses in the vicinity of the project site that would be sensitive to noise and vibration impacts include the residential neighborhood across Moreno Drive to the east of the project site, and Beverly Hills High School to the south of the project site. The high school building that lies adjacent to the project site is the Science and Technology Center building that may include the use of precision instruments that could be affected by vibration.

10. Public Services

(a) Fire Protection

The LAFD is a full-spectrum life safety agency that provides fire protection and emergency medical services to a population of approximately 4 million people throughout the City of Los Angeles. The LAFD's 3,586 uniformed personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. At any given time, there are a total of 1,104 uniformed firefighters, including 242 paramedics, on-duty at 106 fire stations across the LAFD's 471 square mile jurisdiction, exclusive of other on-duty uniformed firefighters that are involved in training or various administrative and support functions.

There are three LAFD fire stations located in the vicinity of the project site. Fire Station No. 92 at 10556 West Pico Boulevard in Century City is located closest to the project site. At a distance of approximately 1.9 street miles and a response time of approximately 6.2 minutes, Fire Station No. 92 would likely be the first to respond to the project site in the event of an emergency and would thus be designated the "first-in" station. "Second call" stations in the event of an onsite emergency are Fire Station Nos. 71 and 58, both located approximately 2.6 street miles from the project site with response times of approximately 7.6 minutes. In the event that additional response teams are needed during a major emergency, third response fire protection and emergency medical services would be provided by other fire stations within the LAFD system in the surrounding West Los Angeles and Century City area, including Fire Station No. 59 located at 11505 West Olympic Boulevard.

The average number of total daily incidents for emergency/life support service calls and fire incidents (fires, traffic accidents, fire alarms, elevator emergencies, etc) for Fire Station Nos. 92, 71, and 58 are 8.4, 4.0, and 15.0 incidents, respectively. The average response times for these stations range from 5.5 to 8.2 minutes.

Water for fire-fighting purposes is supplied to the project site via two, twelve-inch lines approximately 25 feet north of the site under Santa Monica Boulevard, with a water capacity of 6,000 gpm at 30 psi residual flowing at four nearby fire hydrants simultaneously. There is one existing fire hydrant on Santa Monica Boulevard fronting the project site, and also additional fire hydrants in the project vicinity along Santa Monica Boulevard and Century Park East that could serve the project site.

(b) Police Protection

The Los Angeles Police Department (LAPD) includes 21 community police areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. The LAPD also has a variety of support systems including the Direct Support Division, Special Operations, Municipal Division, SWAT, K-9, and the Mounted Unit.

The project site is located in the West Bureau of the LAPD, which covers an area of approximately 124 square miles. The West Bureau oversees operations at four community police stations including the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, and the West Los Angeles Community Police Station. The West Bureau also oversees operations at the West Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes for all operations in the West Bureau.

The project site is served by the West Los Angeles Community Police Station, located at 1663 Butler Avenue, approximately 2.7 miles west from the project site. The West Los Angeles Community Police Station serves an area that is approximately 65.14 square miles and approximately 748 street miles, and is bordered by the cities of Beverly Hills, Culver City, Santa Monica, as well as Los Angeles County and the Pacific Ocean. Currently, the West Los Angeles Community Police Station consists of approximately 235 sworn officers and 18 civilian staff members. In the event a situation should arise requiring increased staffing, additional officers can be called in from other LAPD community police stations.

(c) Schools

The Los Angeles Unified School District (LAUSD) serves the City of Los Angeles and all or portions of 31 other cities, as well as several unincorporated areas of Los Angeles County. LAUSD provides kindergarten through high school (K–12) education to a total of 671,648, students, enrolled throughout 1,092 schools and centers, including: 526 elementary schools, 131 middle schools, 140 high schools, 173 charter schools, 40 continuation senior high schools, 32 community high school and alternative work centers, 22 SPAN schools, 18 special education schools, and 10 community day schools. In addition, the LAUSD provides preschool, adult education, and occupational education through 241 other schools and centers. The LAUSD employs about 68,902 personnel, about half (46 percent) of whom are classroom teachers. Overall, the Los Angeles Unified School District's Fiscal Year 2010-2011 total budget was around $5.1 billion.

LAUSD is currently divided into eight Local Districts including District 3, in which the project site is located. Specifically, the project site is located within the attendance boundaries of Westwood Charter Elementary

School (approximately 1.8 miles southwest of the project site), Emerson Middle School (approximately 1.7 miles southwest of the project site), Webster Middle School (approximately 3.5 miles southwest of the project site), and University High School (approximately 3.9 miles southwest of the project site). These schools are currently operating on a single-track calendar in which instruction generally begins in mid September and continues through late June. In addition, the project site is located in a middle school attendance option area, in which students have a choice of attending either Emerson Middle School or Webster Middle School.

(d) Libraries

The Los Angeles Public Library System (LAPL) provides library services to the City of Los Angeles. LAPL consists of the Central Library and 72 branch libraries, with a multimedia inventory of over six (6) million items and 2,300 computer workstations with access to the internet and electronic databases. All branch libraries provide free access to computer workstations that in addition to providing internet access, are connected to the Library's information network. LAPL has identified four LAPL libraries that would serve the proposed project: the West Los Angeles Branch Library, the Westwood Branch Library, the Robertson Branch Library, and the Palms-Rancho Park Branch Library.

The West Los Angeles Branch Library is located approximately 2.5 miles southwest of the project site. This 13,740-square-foot branch serves a population of 39,147 people, and employs 8.5 full-time staff positions. The library includes a total of 47,123 volumes and has an annual circulation of 123,274 people. The Westwood Branch Library is located approximately 2.8 miles west of the project site. This 12,500-square foot branch, serves a population of 76,725 people, and currently employs 7.5 full-time staff positions. The library includes a total of 62,779 volumes and has an annual circulation of 249,767. The Robertson Branch Library is located approximately 2.9 miles southeast of the project site. This 9,035-square-foot branch library serves a population of 51,559 people, and employs 7.5 full-time staff positions. The library includes a total of 40,324 volumes and has an annual circulation of 204,040.

Although the project is located in the City of Los Angeles, the library nearest the site is the City of Beverly Hills Public Library (BHPL) Main Library. The Main Library is located at 444 North Rexford Drive, approximately 1.2 miles northeast of the project site. The City of Beverly Hills is served by two public libraries; the Main Beverly Hills Public Library and the Roxbury Senior Library. The Main Library is a 91,000 square-foot facility. Given Beverly Hill's current (2011) population of 34,210 residents, the Main Library provides approximately 2.66 square feet of library space per resident.

Both the LAPL and BHPL are members of the Southern California Library Cooperative (SCLC). The SCLC is an association of 46 independent city and special district public libraries located in Los Angeles, Orange, and Ventura counties which have agreed to cooperate in providing library service to the residents of all participating jurisdictions. SCLC members extend, on an equal basis, loan privileges to residents of other member libraries. Participation in this program enables individuals to use their library cards in multiple jurisdictions, and allows for member libraries to receive compensation for such use. Additionally, an array of technical, arts, and general libraries are located on the UCLA campus approximately less than two miles from the project site.

(e) Parks and Recreation

The Los Angeles Department of Recreation and Parks (LADRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City of Los Angeles. Currently, the LADRP maintains over 15,000 acres of parkland with 400 neighborhood and regional parks (including Griffith Park, one of the largest municipal parks within the boundaries of an American city), 11 lakes, more than 180 recreation and community centers, two beaches plus the Venice Beach Ocean Front Walk, 26 licensed child care facilities, 13 golf courses, seven skate parks, seven museums, and an urban forest of one million trees. The project site is located within the LADRP Pacific Region.

The City of Los Angeles has an estimated Citywide ratio of 0.70 acre of neighborhood and community parkland per 1,000 residents; and the West Los Angeles Community Plan area, which includes Century City, has an estimated community ratio of 0.77 acre of neighborhood and community parkland per 1,000 residents.

Although the project site is located within the City of Los Angeles, the park nearest the project site is Beverly Hills' Roxbury Park, under the jurisdiction of the City of Beverly Hills Recreation and Parks Department (BHRPD. The BHRPD parks system consists of 76.7 acres of developed parkland in 13 parks. Also, the Beverly Hills Unified School District provides for after school hour public access to school recreation facilities. The Beverly Hills parkland-to-population ratio is approximately 2.24 acres of parkland per 1,000 residents.

11. Traffic and Circulation

The project site is located in the highly urbanized Century City area within the City of Los Angeles. In general, streets and freeways within the project vicinity are under the jurisdictions of the City of Los Angeles and the California Department of Transportation (Caltrans), with streets to the east of the project site lying within the City of Beverly Hills. Regional access to and from the project area is provided by the San Diego Freeway, approximately 2.25 miles west of the project site, and the Santa Monica Freeway, approximately 2.5 miles south of the project site.

The project site is well served by a grid of arterial streets. Local access to the project area is provided by major arterial streets including Santa Monica, Wilshire, Olympic and Pico Boulevards, which provide east-west access throughout the region, and Beverly Drive, Beverly Glen Boulevard and Sepulveda Boulevard which provide north-south access throughout the region.

The project area is well served by transit agencies including the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT, Santa Monica's Big Blue Bus, Culver City Bus, Antelope Valley Transportation Authority (AVTA) and Santa Clarita Transit. Santa Monica Boulevard, in particular, is a highly utilized transportation corridor with a number of public transit routes operating along this street. Further, the project site is also located in the vicinity of alternative, proposed stations for the extension of the Westside Subway, the Metro Purple Line, that would link downtown Los Angeles with Westwood, via Century City.

Direct access to the project site is provided by Santa Monica Boulevard to the south and Moreno Drive to the east. The project site is currently vacant. No active uses or associated parking for such uses are on the site.

Sidewalks are present on Santa Monica Boulevard and Moreno Drive adjacent to the project site. Santa Monica Boulevard, adjacent to the project site is a designated bikeway.

12. Utilities and Service Systems

(a) Water Supply

The project site is currently vacant and has no consumption of water resources. The water infrastructure serving the project site consists of two 12-inch water mains located along Santa Monica Boulevard. City water mains are designed to meet fire-flow requirements established by the City of Los Angeles Fire Department (LAFD) according to land use, as set forth in the Fire Code of the LAMC Section 57.09.06. There is one fire hydrant located along Santa Monica Boulevard, near the northwest corner of the project site.

The Los Angeles Department of Water and Power (LADWP) is responsible for providing water within the City of Los Angeles limits and ensuring that the delivered water quality meets applicable California health standards for drinking water. Water delivery by LADWP is provided in accordance with the California Urban Water Management Planning Act through an Urban Water Management Plan (UWMP) which is updated every five years. The UWMPs details LADWP's efforts to promote the efficient use and management of its water resources. The availability of sufficient water supply to meet population demand is addressed on the basis of 25-year projections.

Water is supplied to the City from three primary sources including the Los Angeles Aqueducts (LAA), local groundwater, and Metropolitan Water District (MWD). In 2009, LADWP had an available water supply of 561,306 AF, of which approximately 24.4 percent of LADWP's water supply was from the LAA, approximately 11.6 percent came from local groundwater, approximately 63.2 percent from the MWD, and 1.3 percent was from recycled water. Additionally, less than one percent was taken and stored into the reservoir system.

MWD is the largest water wholesaler for domestic and municipal uses in southern California. MWD imports a portion of its water supplies from northern California through the State Water Project's California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. As of June 2005, LADWP has a preferential right to purchase 21.33 percent of MWD's total water supply. LADWP will continue to rely on MWD to meet its current and future supplemental water needs. MWD has consistently stated that its water supplies are fully reliable to meet the demands of its customers, including LADWP, in all hydrologic conditions through at least 2030.

The City of Los Angeles has adopted ordinances requiring the use of efficient water fixtures, water conservation in landscaping and enforcement of limited water use during dry periods. Further, the Mayor and LADWP prepared "Securing L.A.'s Water Supply", which is a plan for creating sustainable sources of water for the future of Los Angeles. This plan is an aggressive multi-pronged approach that includes: investments in state-of-the-art technology; a combination of rebates and incentives; the installation of smart sprinklers, efficient washers and urinals; and long-term measures such as expansion of water recycling and investment in cleaning up the local groundwater supply. These strategies will ensure a reliable water supply for Los Angeles residents and businesses. On April 22, 2008, the City established the Green Building Program to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional and global ecosystems, via among other requirements LEED certification for new buildings.

(b) Wastewater

The project site is currently vacant and there is currently no wastewater generated from the site. The City of Los Angeles Department of Public Works maintains the sewer collection and distribution system located throughout the city with sewer facilities that would serve the proposed project. The project site would be served by the 27 inch Westwood Relief Sewer in Century Park East, east of the project, which continues southerly to the Hyperion Treatment Plant, in Playa Del Rey.

All wastewater generated within the City of Los Angeles and LADPW's service area is transported through the Hyperion Treatment Conveyance System to one of four wastewater treatment plants owned and operated by LADPW: the Hyperion Treatment Plant (HTP) in Playa del Rey, Donald Tillman Water Reclamation Plant (TWRP) in Van Nuys, Los Angeles-Glendale Water Reclamation Plant (LAGWRP) in Los Angeles, or Terminal Island Treatment Plant (TTP) in Los Angeles. The Hyperion Treatment Conveyance System includes treatment plants, outfalls, and numerous sewer connections and major interceptors. The current treatment capacity of the entire Hyperion Treatment Conveyance System is approximately 550 mgd (consisting of 450 mgd at HTP, 80 mgd at TWRP, and 20 mgd at LAGWRP). The Hyperion Treatment Conveyance System has a current average dry water flow (ADWF) of approximately 410 mgd (consisting of 360 mgd at HTP, 38 mgd at TWRP, and 12 mgd at LAGWRP), leaving approximately 140 mgd of available treatment capacity.

In November 2006, the City of Los Angeles Integrated Resources Plan (IRP) and its corresponding Final EIR, were approved by the Los Angeles City Council. Implementation of the IRP would result in an increased treatment capacity in the Hyperion Treatment Conveyance System. The treatment capacity would increase by 20 mgd for a total of 570 mgd (TWRP having a new capacity of 100 mgd, while HTP's capacity of 450 mgd and LAGWRP's capacity of 20 mgd staying the same). Adoption of the IRP also includes the Adaptive Capital Improvement Program (CIP) which includes the anticipated capital, operation and maintenance, project timing, and implementation strategy for tracking and monitoring triggers.

B. RELATED PROJECTS

The California Environmental Quality Act (CEQA) requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts."[27] The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness."[28]

Cumulative impacts are anticipated impacts of the proposed project along with reasonably foreseeable growth. Reasonably foreseeable growth may be based on either:[29]

- A list of past, present, and reasonably anticipated future projects producing related or cumulative impacts; or

[27] *State CEQA Guidelines, 14 California Code of Regulations, § 15355, et seq.*

[28] *Ibid, § 15355.*

[29] *Ibid, § 15130(b)(1).*

- A summary of projections contained in an adopted general plan or related planning document designed to evaluate regional or area wide conditions.

Buildout of the proposed project is forecasted to occur in 2016. Accordingly, this Draft EIR considers the effects of other known proposed development projects that may be constructed between 2011 and 2016. The list of related projects was provided by the City of Los Angeles Department of Transportation (LADOT), and the City of Beverly Hills. The area for which the related projects are identified is the study area that was identified for the traffic analysis, i.e. the area in which the project might substantially affect traffic conditions. The development of 40 related projects is anticipated in the project study area (18 in the City of Los Angeles and 22 in the City of Beverly Hills). **Table III-1**, *Related Projects*, summarizes the location, land use, and size of each related project. **Figure III-1**, *Location of Related Projects,* depicts the location of each related project. The map numbers identified in Figure III-1 correspond to the related project numbers identified in Table III-1. The analysis of cumulative development also assumes a 1.0 percent average annual growth factor in traffic levels between 2011 and 2013. The projected cumulative development is addressed in the analyses of each of the environmental issues.

Table III 1

Related Projects

No.	Project	Address	Land Use	Size
		City of Los Angeles		
1	Office Building	10400 Ashton Ave	Office	17,500 sf
2	Mixed-Use Development	10700 Santa Monica Blvd	Office	35,000 sf
			Retail	9,000 sf
3	Mixed-Use Development	10955 Wilshire Blvd	Hotel	134 rooms
			Condos	10 du
			Commercial	16,500 sf
4	Mixed-Use Development	10857 Santa Monica Blvd	Condos	47 du
			Retail	16,500 sf
5	Office Building	2142 Pontius Ave	Office building	17,600 sf
6	Mixed-Use Development	9001 Pico Blvd	High school	425 students
			Retail	9,000 sf
			Dormitory	31 units
7	Mixed-Use Development	1130 Gayle Ave	Retail	7,000 sf
			Apartments	48 du
8	Mixed-Use Development	1777 Westwood Blvd	Condos	45 du
			Retail	9,000 sf
9	Condominium	10777 Wilshire Blvd	Condos	60 du
10	Convenience Store	900 Gayley Ave	Convenience store	2,800 sf
11	Mixed-Use Development	9760 Pico Blvd	High school	350 students
			Community college	100 students
			Synagogue	100 attendees
12	Condominium	1929 Beloit Ave	Condos	63 du
13	Museum of Tolerance Expansion	9786 Pico Blvd	Museum Special Events	100,000 sf 800 attendees
14	Century City Westfield Expansion	10250 Santa Monica Blvd	Commercial Condos	359,000 sf 262 du

Table III-1 (Continued)

Related Projects

No.	Project	Address	Land Use	Size
15	Mixed-Use Development	11122 Pico Blvd	Apartments	538 du
			Target store	212,000 sf
			Supermarket	54,000 sf
16	Mixed-Use Development	2025 Avenue of the Stars	Condos	208 du
			Hotel	240 rooms
			Office	117,600 sf
			Fitness club	16,800 sf
			Restaurant	15,400 sf
			Retail	93,800 sf
17	Condominium	10331 Bellwood Ave	Condos	158 du
18	Century City Center Office	1950 Avenue of the Stars	Office	725,830 sf
		City of Beverly Hills		
19	Wallis Annenberg Center	470 N Canon Dr	Center & Garage	NA
20	9900 Wilshire Blvd	9900 Wilshire Boulevard	Condominiums	252 du
			Retail	15,656 sf
			Quality Restaurant	4,800 sf
21	Beverly Hills Gateway	9844 Wilshire Boulevard	General Office	95,000 sf
22	The Beverly Hilton	9876 Wilshire Boulevard	Hotel Rooms	170 rooms
			Condominiums	120 du
			Restaurant	11,500 sf
23	Condominiums	9936 Durant Drive	Condominiums	13 du
24	Office Building	9900 Santa Monica Blvd	Office	119,000 sf
25	Young Israel	9261 Alden Drive	Sanctuary	14,811 sf
			Multi-Purpose Room	1,254 sf
26	Condominiums	450-460 North Palm Drive	Condominiums	35 du
27	Condominiums	432 N Oakhurst Drive	Condominiums	34 du
28	Mixed-Use Development	231 North Beverly Drive	Retail	22,500 sf
			Restaurant	7,500 sf
29	Medical Plaza	257 North Canon Drive	Office	40,000 sf
			Retail	15,000 sf
			Restaurant	5,000 sf
30	Condominiums	140-144 South Oakhurst Drive	Condominiums	11 du
31	Retail	320 N Rodeo Drive	Retail	15,000 sf
32	Mixed-Use Development	9200 Wilshire Boulevard	Retail	8,400 sf
			Restaurant	5,600 sf
			Condominiums	54 du
33	Car Dealership	9230 Wilshire Boulevard	Car Dealership	NA
34	Office Building	9378 Wilshire Boulevard	Office	14,996 sf
35	Condominiums	225 S Hamilton Drive	Condominiums	13 du
36	Condominiums	156-168 North La Peer Drive	Condominiums	10 du

Table III-1 (Continued)

Related Projects

No.	Project	Address	Land Use	Size
37	Medical Office/Retail	8536 Wilshire Boulevard	Medical Office/Retail	24,890 sf
38	Mixed-Use Development	8600 Wilshire Boulevard	Residential	21 du
			Retail	4,800 sf
			Retail Existing	2,500 sf
39	Retail/Office	8767 Wilshire Boulevard	Retail/Office	75,000 sf
40	Office/Medical Office	9754 Wilshire Boulevard	Office	24,566 sf
			Medical Office	7,977 sf
			Existing Office	26,000 sf

Source: City of Los Angeles Department of Transportation; City of Beverly Hills; Fehr & Peers, Transportation Analysis Report, August 2011

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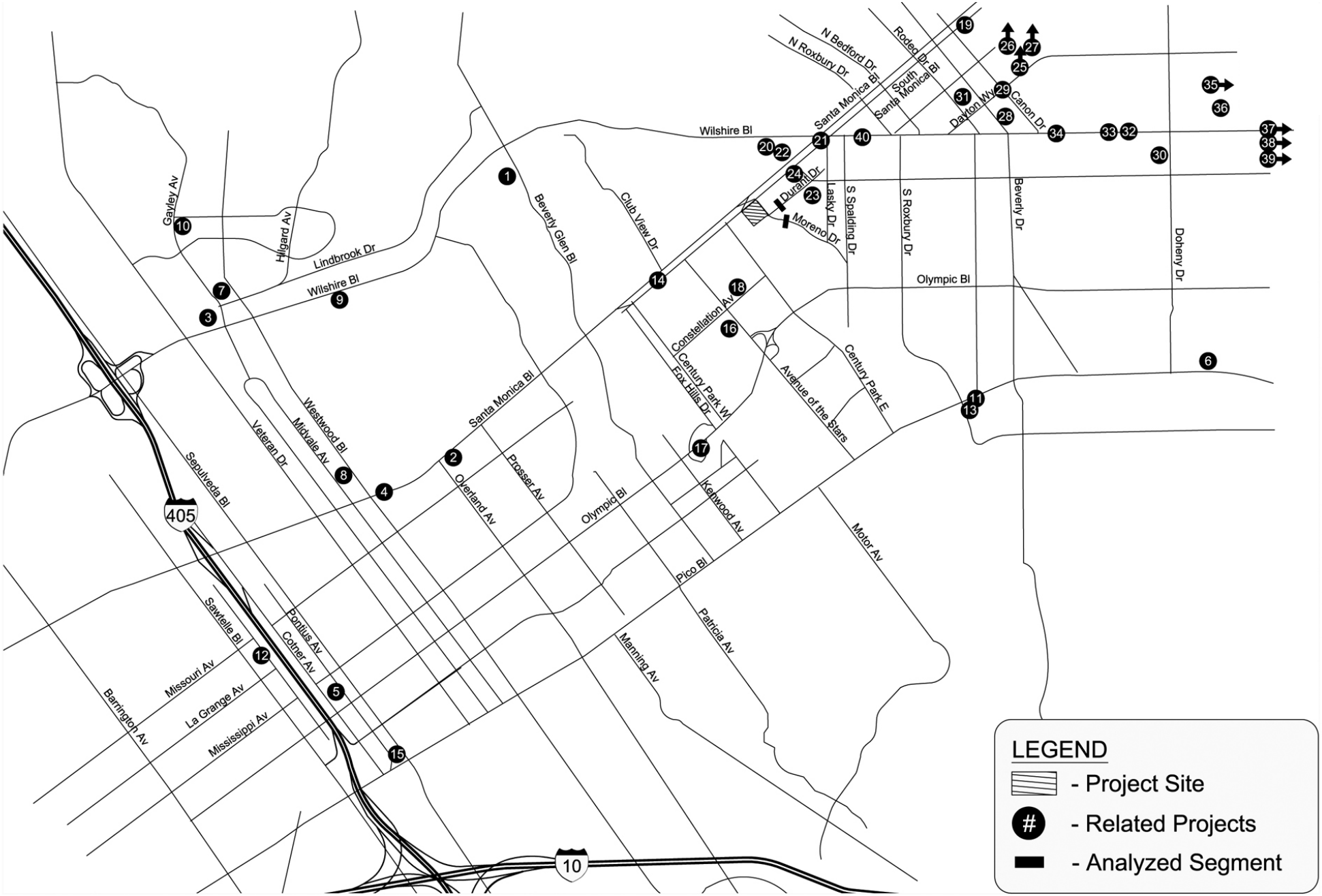

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N

Not to scale

Location of Related Projects

10000 Santa Monica Boulevard

Source: Fehr & Peers, May 2011.

FIGURE

III-1

IV. Environmental Impact Analysis

IV. ENVIRONMENTAL IMPACT ANALYSIS
A. AESTHETICS/VISUAL RESOURCES

1. INTRODUCTION

This section addresses the potential aesthetic and visual resources impacts that could result from the proposed project with regard to visual quality, views, light, glare, and shading. Visual quality refers to the overall aesthetics of an area or a field of view. Aesthetic features often consist of unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. The focus of the visual quality analysis is on the loss of aesthetic features or the introduction of contrasting features that could degrade the visual character of the project area.

The analysis of views focuses on the extent to which a project would interfere with visual access to visual resources from a vantage point or corridor. "Focal views" consist of views of a particular object, scene, setting, or feature of visual interest; "panoramic views" or vistas consist of views of a large geographic area for which the view may be wide and extend into the distance. Structures and other elements constructed or added to a project may obstruct focal or panoramic views. The State of California and the City of Los Angeles have recognized the value of access to visual resources through planning and zoning regulations that designate, preserve, and enhance public views. Through the designation of scenic resources and various land use plans, the City specifies development standards that help prevent the obstruction of views. These standards include the regulation of building height and mass, which are principal issues regarding view obstruction.

Artificial light impacts are typically associated with light that occurs during the evening and nighttime hours, and may include streetlights, illuminated signage, vehicle headlights, and other point sources. Uses such as residences and hotels are considered light sensitive since they are typically occupied by persons who have an expectation of privacy during evening hours and who are subject to disturbance by bright light sources. The analysis of lighting impacts focuses on whether the project would cause or substantially increase lighting effects on light sensitive uses.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare generation is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Glare generation is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light sensitive land use. The analysis of glare focuses on whether glare effects would interfere with off-site activities.

Shading from buildings and structures has the potential to block sunlight. Although shading is common and expected in urban areas, and is considered a beneficial feature when it provides cover from excess sunlight and heat, it can have an adverse impact if it interferes with sun-related activities at shade-sensitive uses.

2. ENVIRONMENTAL SETTING

a. Existing Visual Resources

(1) Visual Character

(a) Project Site

(i) Views of the Project Site

Views of the project site from various locations are shown in **Figures IV.A-1 through IV.A-3**. Nearby views of the site that present its current appearance are shown in **Figure IV.A-1**, *Existing Views of the Project Site from Westbound South Santa Monica Boulevard*, below. As shown in Figure IV.A-1, the existing, approximately 2.4-acre project site is currently vacant. The site has been graded and is enclosed by an 8-foot construction/security fence. The existing site contains no historical resources or other features that would be considered a view resource. Because of the highly urban character of the area, intervening development prevents views of the project site from public locations other than immediately adjacent streets. Views of the project site are available from the adjacent Santa Monica Boulevard, South Santa Monica Boulevard, and Moreno Drive.

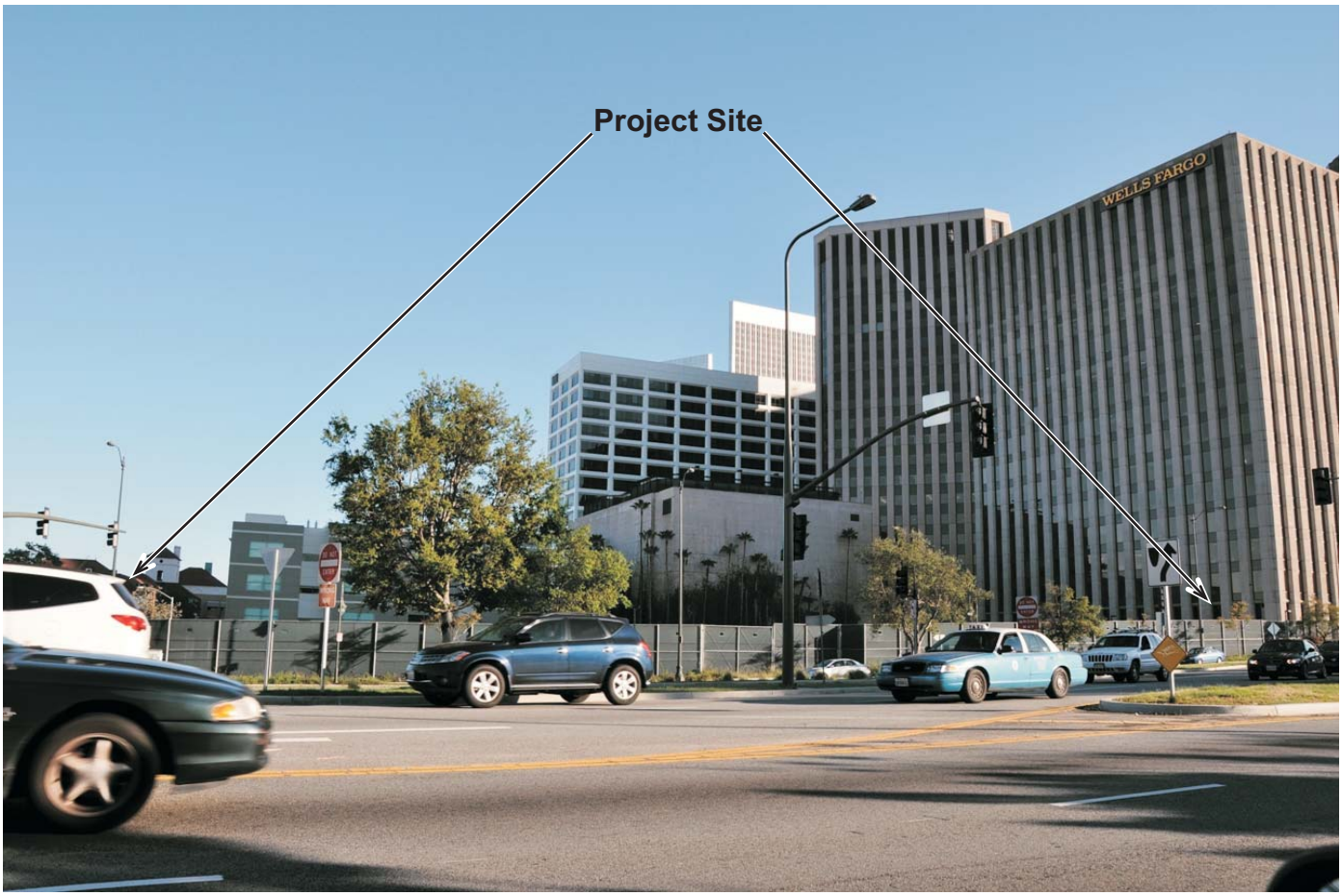
(ii) Views Across the Project Site

Individual views across the project site from Santa Monica Boulevard are depicted in **Figure IV.A-2**, *Existing Views of the Project Site from Eastbound/Westbound Santa Monica Boulevard*. As shown in Figure IV.A-2, the view of the project site is partially obscured by the northerly of the two Northrop Plaza buildings (City National Bank). However, as the viewer approaches the project site from the west (eastbound), more of the site comes into view. As shown in the westbound view in Figure IV.A-2, the project site is more visible from the west because tall buildings (such as the Northrop Plaza Buildings) are located in the background of the site. However, from westbound Santa Monica Boulevard, low-rise buildings and landscaping to the south of Santa Monica Boulevard partially obstruct views of the project site at ground level (as shown in Figure IV.A-2). By comparison, west-facing views from South Santa Monica Boulevard (as shown in Figure IV.A-1) are more open because of the proximity of the street to the project site. In Figure IV.A-2 (westbound view), the northwest corner of the Beverly Hills High School Science and Technology Building is visible at the south edge of the project site.

Figure IV.A-3, *Existing Views of the Project Site from Moreno Drive and Vicinity*, presents westerly-facing views across the project site from the intersection of Durant Drive and Moreno Drive. The top photo shows the relationship between the project site and the Beverly Hills High School's Science and Technology Building, which is located just south of a driveway to the south of the project site's boundary, and the Northrop Plaza buildings that create the background for the project site. The bottom photo in Figure IV.A-3 presents a view across the project site from northbound Moreno Drive. Ground-level views of the project site are obscured by the temporary 8-foot construction fence. No panoramic or horizon views are available across the project site because of dense vegetation along Santa Monica Boulevard, including screening hedges along the south edge of the golf course.

(b) Aesthetic Character of the Surrounding Area

The project site is located within Century City, and is bordered by the City of Beverly Hills to the south and east. This area is highly urbanized and the aesthetic character of the area is strongly influenced by the mid-



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Existing Views of the Project Site from Westbound South Santa Monica Boulevard

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-1

Eastbound

Westbound

PCR

Existing Views of the Project Site from Eastbound/Westbound Santa Monica Boulevard

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-2

PCR

Existing Views of the Project Site from Moreno Drive and Vicinity

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-3

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and high-rise buildings of Century City. Century City is located to the west and southwest of the project site and includes office buildings, hotels, entertainment, and residential uses. The 15- and 19-story Northrop Plaza buildings are located adjacent to the project site to the west and a seven-story above-grade parking structure and a 15-story building at 1880 Century Park East are located adjacent to the project site to the southwest.

Other notable buildings in Century City include the twin 44-story Century Plaza towers, the 36-story MGM Tower, the 39-story AIG SunAmerica Building, the two 23-story Watt Plaza towers, the 39-story Fox Plaza building, the 19-story Century Plaza Hotel, and the recently constructed 40-story Century residential tower. The 39-story 10131 Constellation Boulevard Towers have also been approved; as well as the approved, future New Century project at the Westfield Shopping Center to the west which includes improvements to the shopping center and a 39-story residential tower.

The physical setting of Century City consists of rolling terrain, which is generally higher in elevation than adjacent areas to the north and south. Since the cluster of high-rise buildings in Century City is higher than the built environment of the surrounding area, and because the ground elevation of Century City is generally higher than the surrounding terrain, the predominant high-rise structures of Century City, which are visible from a great distance throughout the Los Angeles Basin, create a distinctive component of the West Los Angeles urban skyline. Thus, Century City's high-rise skyline is considered an aesthetic resource. Vantage points with views of Century City's high-rise profile include tall buildings or geographically higher areas, such as the Getty Center. Areas free of immediate view obstructions such as public parks, golf courses, and other open space areas that have adequate setbacks also have views of Century City's skyline. Notable features within Century City include landscaped setbacks, plazas, fountains, streetscape, and pedestrian bridges across Avenue of the Stars, which is designated as a scenic highway on the West Los Angeles Community Plan, Land Use Map.

In addition, Santa Monica Boulevard between Sepulveda Boulevard and the City of Beverly Hills is listed as a Scenic Highway in the table provided in Appendix E "Inventory of Designated Scenic Highways" of the Los Angeles General Plan, Transportation Element. However, no scenic features or resources for Santa Monica Boulevard are identified in the Transportation Element. Notwithstanding, the Santa Monica Boulevard Transit Parkway strongly contributes to the visual character of the area. The parkway features broad landscaped medians in a network of intersecting access roadways, particularly at the intersection of South Santa Monica Boulevard and Moreno Drive, along the frontage of the project site. The Los Angeles Country Club golf course is located to the north of Santa Monica Boulevard Transit Parkway, directly to the north of the project site. The golf course is blocked from street view by a 10-foot landscaped wall and street trees abutting the sidewalk. However, as viewed from a distance, the golf course provides a broad open space surmounted by high-rise development along Wilshire Boulevard in the background.

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. The Beverly Hills High School campus is located directly to the south of the project site, south of the jurisdictional boundary. The Beverly Hills High School's 4-story, Science and Technology Building, the nearest building to the project site, is separated from the project site by an approximate 20-foot dedicated private drive within the school campus. The high school features primarily Mediterranean-style architecture, typical in much of the City of Beverly Hills, and is generally low-rise in character with broad lawns fronting along the west side of Moreno Drive. Uses to the east of Moreno Drive are multi-family-zoned residential uses fronting Durant Drive,

Robbins Drive, and Young Drive to the east and southeast of the project site and 3 and 4-story commercial buildings located along South Santa Monica Boulevard. Buildings in Beverly Hills are generally low-rise in character. Landscaped setbacks, unified street tree programs, plazas and other open space features are evident throughout Beverly Hill's residential and commercial neighborhoods. A currently underutilized site located in the former rail right-of-way site between South Santa Monica Boulevard and the Santa Monica Boulevard Transit Parkway, is currently proposed for commercial and retail buildings, with a 45-foot height limit.

Taller buildings in the City of Beverly Hills are proposed for the former Robinsons-May department store site, along Wilshire Boulevard, to the northeast of the project site. Known as "9900 Wilshire," the project site has been approved for the demolition of the former department store, and the development of two approximately 12 to 15-story residential buildings, and two low-rise commercial buildings; although the status of this project is pending.

The area to the west of Century City along Santa Monica Boulevard, in the City of Los Angeles, is developed with generally mid- and low-rise commercial buildings, with some multi-family uses. Single family neighborhoods are located to the west of Century City, south of Santa Monica Boulevard, in the Fox Hills area and to the north of Santa Monica Boulevard, to the west of the Los Angeles Country Club Golf Course.

(2) View Resources

The City of Los Angeles has recognized the value of access to visual resources. A variety of visual resources occur within the Century City area that have the potential to be affected by additional development within Century City. Public viewing locations or vantage points within or outside of Century City include: (1) public streets and sidewalks adjacent to the project site and in the surrounding area that have existing views of identified view resources, (2) public parks and recreational fields, (3) distant view locations such as the Getty Center or other locations in the Hollywood Hills, (4) raised freeways, and all other public areas that would have views of Century City or views across the project site to identified view resources.

North facing views in and around the project vicinity include: (1) views of the Century City skyline (south of Century City); (2) views of architecturally distinctive buildings within Century City; (3) horizon views of the Hollywood Hills, (4) views of the Wilshire Boulevard high-rise corridor in Westwood; and (5) views of the Los Angeles Country Club Golf Course. Other raised locations to the south, such as the northbound I-405 Freeway, Baldwin Hills, or Westchester Bluff, may also have north-facing views of Century City's skyline.

There are no north-facing public views of scenic resources across the project site. The existing 8-foot construction/security fence surrounding the project site obstructs potential scenic views, including views of the golf course, Wilshire Boulevard, and Hollywood Hills from the street level.

South-facing views across the project site include views of the Century City skyline and views of architecturally distinctive buildings within Century City from public streets and vantage points to the north (or northeast and northwest) of Century City. The south-facing view of the project site from 10101 Wilshire Boulevard is partially blocked by plantings along the golf course boundary. Southeast-facing view of the project site from the Los Angeles Country Club Golf Course incorporates more of Century City's skyline because of the open fairway.

East-facing and west-facing views across the project site are dominated by the backdrop of Century City's existing cluster of high-rise buildings. Regionally, Century City (depending on weather conditions) is visible from many areas throughout the western portion of the Los Angeles Basin. As indicated above, views of Century City are considered an aesthetic resource, due to its notable high-rise buildings, and its contribution to the interest and variety of the Los Angeles skyline.

(3) Light and Glare

Existing nighttime lighting within the project vicinity consists of light spillage from commercial buildings, illuminated building identification signs, streetlights, vehicle lights, and surface parking lot lights that occur within commercial areas along Santa Monica Boulevard to the east and west of the project site. Streetlights, vehicle headlamps, business signs, and spillage from building windows also contribute to ambient night lighting in Century City and Beverly Hills. Nighttime illumination is lowest in the area's residential neighborhoods and open space areas such as the Los Angeles Country Club Golf Course.

Sensitive uses with respect to artificial or nighttime light and glare in the project vicinity are the residential neighborhoods located to the east of Moreno Drive. Other sensitive areas include the Fox Hills Drive neighborhood located to the west of Century City and the residential neighborhood located between Wilshire Boulevard and Santa Monica Boulevard to the west of the Los Angeles Country Club golf course. However, many of these areas maintain landscape lighting during the late hours for the purpose of maintenance and security.

Daytime glare is generally associated with sunlight reflected from buildings with large continuous expanses of highly reflective materials. Activities that would be sensitive to daytime glare from reflected sunlight include motorists traveling on the adjacent roadways and people working in adjacent buildings. No free-standing, illuminated signage that would potentially generate glare occurs on the project site. Some reflectivity from existing buildings occurs with respect to Santa Monica Boulevard, however, no glare that interferes with driving conditions has been observed during field inspections of the area. However, because of the northeasterly orientation of eastbound Santa Monica Boulevard, the potential exists during some seasons for reflected afternoon glare from the southwest facades of buildings along this street.

(4) Shading

The concentration of high-rise buildings within Century City creates a varying pattern of shadows that rotates in a sweeping arc within and beyond the boundaries of Century City toward the west, north, and east, according to the movement of the sun. Century City's shadows primarily extend beyond Century City into the surrounding area during the early morning and late afternoon hours throughout the year. The currently vacant project site causes no shading on any off-site uses.

Shade sensitive uses in the area include residential neighborhoods north of Santa Monica Boulevard to the northeast, residential neighborhoods in the City of Beverly Hills to the east, and Beverly Hills High School to the south. Shade-sensitive recreational uses in the area include the Los Angeles Country Club golf course to the north, which is a private facility.

b. Policy and Regulatory Environment

(1) General Plan Framework

The City of Los Angeles General Plan Framework provides direction as to the City's vision for future development in the project vicinity. Under the Urban Form and Neighborhood Design section of the General Plan Framework, Century City is identified as a Regional Center. Although the General Plan Framework does not directly address the design of individual neighborhoods or communities, it embodies generic neighborhood design policies and implementation programs that guide local planning efforts. The General Plan Framework encourages the development of centers in which scale and built form allow both daytime and night-time use. As an example, Policy 5.2.2.c states that the built form will vary by location. This policy acknowledges that, although non-pedestrian-oriented freestanding high-rises characterize a portion of the Century City Regional Center, Regional Centers should contain pedestrian oriented areas, and that pedestrian-oriented design as acknowledged in Policy 5.8.1 should be incorporated into the overall pattern of development within Century City.[1] This urban design policy also acknowledges the need for the enhancement of pedestrian activity through the provision of well-lit exteriors to provide safety and comfort (Policy 5.8.1.e) and the screening or location of parking out of public view (Policy 5.8.1.g). The General Plan Framework also states that the livability of all neighborhoods would be improved by upgrading the quality of development and improving the quality of the public realm (Objective 5.5).[2] Policies that support this objective include the planting of street trees which provide shade and give scale to the residential and commercial streets in all neighborhoods of the City (Policy 5.5.1) and the incorporation of street lights, bus shelters, benches, and other street furniture (Policy 5.5.4). Applicable Urban Form and Neighborhood Design policies of the General Plan Framework are identified in the impact analysis section, below.

(2) West Los Angeles Community Plan

The project site is subject to the policies and goals of the West Los Angeles Community Plan. The West Los Angeles Community Plan implements the urban form policies of the General Plan Framework. The urban design goals of the Community Plan are to identify general design standards that should be utilized by the decision-maker when reviewing individual projects. These policies establish the minimum level of design that should be observed. In addition, the Community Design and Landscaping Guidelines section of the Community Plan is directed at the use of streetscape improvements and landscaping in public spaces and rights-of-way.

The Community Plan design policies and guidelines are intended to ensure that projects incorporate specific elements of good design, the intent of which is to promote a stable and pleasant environment.[3] In commercial areas, the emphasis is on the provision and maintenance of the visual continuity of streetscapes and the creation of an environment that encourages both pedestrian and economic activity. In multi-family neighborhoods, the emphasis is on architectural design that enhances the quality of life, living conditions, and neighborhood pride of the residents.[4] Applicable design policies intended to implement the Urban Form policies of the General Plan Framework for multi-family neighborhoods include the use of articulations and recesses in exterior walls to improve community appearance by avoiding excessive variety or monotonous repetition.

[1] *General Plan Framework, Policy 5.2.2.c, page 5-8.*
[2] *General Plan Framework, page 5-14.*
[3] *West Los Angeles Community Plan, page V-1.*
[4] *West Los Angeles Community Plan, page V-1.*

In addition to establishing design standards for individual projects, the Community Plan sets forth Community Design and Landscaping Guidelines for streetscape and landscaping in public places and rights-of-way. The intent of the Landscaping Guidelines is to improve the physical and aesthetic public environment. According to the Community Plan, the presence or absence of street trees is an important ingredient to the aesthetic quality of an area. Other Community Design and Landscaping Guidelines include entryway improvements, streetscape, street furniture, street lighting, sidewalks and paving, signage, and public open space. Applicable Community Plan design policies and guidelines are identified in the impact analysis section, below.

(3) Century City North Specific Plan

The project site is located within the Century City North Specific Plan (CCNSP) area. Under the CCNSP, development is allowed in accordance with set criteria. Visual resources policies in the CCNSP include shade criteria provisions; design of a project so that ventilation, heating, and air conditioning ducts and other appurtenances are screened from pedestrians, motorists, and occupants of adjacent buildings; and the design of parking façades to be compatible in architectural character with the principal building and adjacent buildings. The CCNSP's requirements related to visual resources that are applicable to the project are identified in the impact analysis section, below.

(4) Greening of Century City Pedestrian Connectivity Plan

The *Greening of Century City Pedestrian Connectivity Plan* (May 3, 2007) is a City of Los Angeles Planning Commission approved document that provides guidelines for the future development of Century City. Much of the Greening of Century City Plan's focus is to enhance Century City as a 24-hour, 7-day sustainable, walkable neighborhood. The Greening of Century City 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.

(5) LAMC Lighting Regulations

Lighting, such as streetlights and illuminated signs, is regulated by the Los Angeles Municipal Code (LAMC). Applicable regulations for the project site include the following:

- Chapter 1, Article 2, Sec. 12.21 A 5(k). All lights used to illuminate a parking area shall be designed, located and arranged so as to reflect the light away from any streets and adjacent premises.
- Chapter 1, Article 7, Sec. 17.08 C. Plans for street lighting shall be submitted to and approved by the Bureau of Street Lighting for subdivision maps.
- Division 62, Sec. 91.6205.13. No sign shall be arranged and illuminated in such a manner as to produce a light intensity greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.
- Chapter 9, Article 3, Sec. 93.0117(b). No exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

3. PROJECT IMPACTS

a. Methodology

(1) Aesthetic Character

The evaluation of visual quality pertains to the degree and nature of contrast between the proposed project and its surroundings. Existing visual quality on the project site and in the project area is compared to the expected appearance of the site in order to determine whether the visual character of the area would be degraded. Factors such as changes in the appearance of the project site, building height and massing, setbacks, landscape buffers and other features are taken into account.

(2) Views

The analysis of view impacts is based on the evaluation of simulated composite photographs showing existing and future conditions for representative locations within a range of distances and variety of directions from the project site. The intent of the evaluation of viewsheds is to determine if valued visual resources exist and whether valued visual resources would be blocked or diminished as a result of project development. The evaluation further considers whether the project would enhance viewing conditions through the creation of new resources and whether the proposed project includes design features that would offset or mitigate specific impacts.

The *City of L.A. CEQA Thresholds Guide (2006)* provides that an analysis of project impacts to visual resources must include analysis of views from such public places as designated scenic highways, corridors, parkways, roadways, bike paths and trails. A viewing location must include views of scenic resources that are available to the public. Under the CEQA Thresholds Guide, an office building or private residence would not be considered a viewing location since views of broad horizons, aesthetic structures, and other scenic resources would not be available to the public. In addition, the California courts have routinely held that "obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact." *Banker's Hill, Hillcrest, Park West Community Preservation Group v. City of San Diego*, 139 Cal. App. 4th 249, 279 (2006).

(3) Light and Glare

The analysis of light and glare identifies the location of light-sensitive land uses and describes the existing ambient conditions on the project site and in the project vicinity. The analysis describes the project's proposed light and glare sources, and the extent to which project lighting, including illuminated signage, would spill off the project site onto light-sensitive areas. The analysis also describes the affected street frontages, the direction in which the light would be focused, and the extent to which the project would illuminate sensitive land uses. The analysis also considers the potential for sunlight to reflect off building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

(4) Shading

The consequences of shadows on land uses can be positive, including cooling effects during warm weather; or negative, such as loss of warmth during cooler weather and loss of natural light for landscaping and human activity. In order to determine whether shading impacts would have a significant impact on the

physical environment, shading diagrams are prepared that show the adjacent off-site shade-sensitive uses that would be receive shadows and the nature of shading that would occur. The shading diagrams reflect sensitive uses, shading time durations, and shading threshold limits established for purposes of CEQA compliance in the *City of L.A. CEQA Thresholds Guide (2006).* Sensitive uses include all residential uses and routinely usable outdoor spaces associated with recreational or institutional uses (i.e., schools), commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas, nurseries, and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. The shading durations evaluated include shading that would occur on the winter solstice and spring equinox between 9 A.M. PST and 3 P.M. PST; and during the summer solstice and fall equinox between 9:00 A.M. PDT and 5:00 P.M. PDT. The duration of shading that would occur is compared to threshold limits that are considered significant. The shading analysis also addresses the extent of shading at the one single-family residential unit in the project vicinity to determine potential effects per a two-hour, single family shading standard established in the CCNSP.

(5) Consistency with Regulatory Plans and Policies

The evaluation of aesthetic resources also compares the project to the standards and policies set forth in existing plans. These include the *Urban Form and Neighborhood Design* Policies of the *General Plan Framework*; *General Plan Transportation Element*, *Scenic Highway Guidelines*; *Urban Design Policies* of the *West Los Angeles Community Plan;* and CCNSP policies related to urban design and character and shading. Related aesthetic policy documents, such as the City of Los Angeles *Walkability Checklist* and the *Greening of Century City Pedestrian Connectivity Plan* are evaluated in Chapter IV.H, *Land Use*, of this EIR. As described therein, the project would be substantially consistent with the policies of these two plans.

b. Significance Thresholds

(1) Visual Character and Aesthetics

(a) Appendix G to the State CEQA Guidelines

Appendix G of the *State CEQA Guidelines* provides sample questions for use in an Initial Study to determine a project's potential for environmental impacts. According to the sample questions included in Appendix G under Section I, Aesthetics, a project would have a potentially significant aesthetic impact if it would:

a. Have a substantial adverse effect on a scenic vista; or

b. Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway; or

c. Substantially degrade the existing visual character or quality of the site and its surroundings.

(b) City of Los Angeles CEQA Thresholds Guide

The *Los Angeles CEQA Thresholds Guide* indicates that the determination of significance with respect to aesthetics and visual character shall be made on a case-by-case basis, considering the following factors:

- The amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished;
- The amount of natural open space to be graded or developed;
- The degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc.;
- The degree of contrast between proposed features and existing features that represent the area's valued aesthetic image;
- The degree to which a proposed zone change would result in buildings that would detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements;
- The degree to which the project would contribute to the area's aesthetic value; and
- Applicable guidelines and regulations.

Based on these factors, the project would have potentially significant impacts with respect to aesthetic character if it were to:

AV-1 Substantially alter, degrade, or eliminate the existing visual character of an area, including valued existing features or resources; or if the project were to introduce elements that substantially detract from the visual character of an area.

(2) Views

The factors used in the *Los Angeles CEQA Thresholds Guide* to determine significant view impacts are inclusive of those provided in Appendix G of the State *CEQA Guidelines*. The *Los Angeles CEQA Thresholds Guide* indicates that the determination of significance with respect to views shall be made on a case-by-case basis, considering the following factors:

- The nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean);
- Whether the project affects views from a designated scenic highway, corridor, or parkway;
- The extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and
- The extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

Based on these factors, the project would have potentially significant impacts with respect to views if:

AV-2 Its development were to obstruct or alter an existing recognized valued view.

(3) Light and Glare

Appendix G of the CEQA Guidelines provides one screening question that addresses impacts with regard to light and glare. The question asks whether the project would:

- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

In the context of this question from Appendix G of the CEQA Guidelines, the *City of L.A. CEQA Thresholds Guide (2006)* states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

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

Based on these criteria, the project would have a significant impact on light aesthetics if:

AV-3 The proposed project lighting or glare would substantially alter the character of off-site areas surrounding the project site.

(4) Shading

Appendix G of the CEQA Guidelines does not provide screening questions that address impacts with regard to shading. Thresholds to evaluate the impacts of shading on the physical environment are based on the *City of L.A. CEQA Thresholds Guide (2006)*. According to this Guide, the proposed project would have a potential impact if:

AV-4 The project would shade shadow-sensitive uses more than three hours between the hours of 9:00 A.M. and 3:00 P.M. Pacific Standard Time (PST), between late October and early April or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. Pacific Daylight Time (PDT) between early April and late October.

Also, CCNSP Section 3.C.1.b encourages site designs that "… reasonably assure that [a project] will not cast a shadow for more than two hours between 8 A.M. and 8 P.M., upon any detached single-family dwelling located outside the Specific Plan Area." Based on this standard, the project would have a significant shading impact if:

AV-5 The project would shade one detached single-family residential unit located outside of the Specific Plan area for more than two hours between 8:00 A.M. and 8:00 P.M.

c. Analysis of Project Impacts

Impacts of the proposed project on Aesthetics and Views would be mostly similar between the Conventional Parking Option and the Automated Parking Option. The only difference in site appearance between the two options would result from the lowered height of the ancillary parking structure with the implementation of automated parking to serve the project residents. With the Conventional Parking Option, the ancillary building would have a maximum height of 90 feet high with a reduced height of 40 feet along the front of the building facing Santa Monica Boulevard. With the Automated Parking Option the maximum building height would be 40 feet, with the height of the building reduced to 20 feet along the Santa Monica Boulevard frontage. The smaller building would result in less building massing on the project site.

From most view locations, the variation in building height would not be particularly noticeable. However, it would be noticeable for travelers passing by on Santa Monica Boulevard and travelers on Moreno Drive and residents in the adjacent Beverly Hills neighborhood to the southeast. The lower building height would make the building less noticeable. For views from the southeast, the lower building height would more closely blend with the at-grade garden milieu located in the southeasterly sector of the project site.

Accordingly, the following analysis focuses on the Conventional Parking Option. Impacts of the Automated Parking Option would be reduced slightly from the impacts identified below. Where appropriate, the analysis below notes the reduced impacts that would occur with the Automated Parking Option.

(1) Project Design Features

As discussed in Section II, *Project Description*, of this Draft EIR, the proposed project would provide up to 283 residential units in a 39-story tower and would include an attached smaller ancillary building. The project would also include approximately 43,141 square feet of ground-level landscaping. Elements of the proposed project pertinent to the evaluation of aesthetic and view impacts are discussed below.

(a) Architectural Style, Massing, and Setbacks

The project comprises a 39-story, 460-foot-high residential tower and an adjoining ancillary building used for parking and recreational amenities. The architectural concept for the residential tower is illustrated in Figure II-4, *Conceptual Design Simulation,* in Chapter II, *Project Description*, of this EIR. As shown in Figure II-4, the building would break away from the traditional, rectangular high-rise design through the creation of interrelated building quadrants and sloped lines for roofs, entry canopies and selected building faces (slightly angled facades) to create articulation and interest. The building would provide a broad, 40-foot-high entrance lobby oriented toward Santa Monica Boulevard. An angular, one-story glass lounge would be cantilevered over the east edge of the building. This feature would enhance the definition of the pedestrian view with a distinctive horizontal feature at the pedestrian level. Each residential unit would open onto private balconies, which, by adding horizontal lines at each story, would further contribute to the visual interest of the building façade. Primary building materials would include clear glass, fritted glass (glass treated to provide some opacity, texture, and reduce reflectivity), metal panel, aluminum and stone.

A conceptual site plan for the project that shows the building placement on the project site, and the general landscaping concept is provided in Figure II-3 in Chapter II, *Project Description*, of this EIR. As indicated in Figure II-3, 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 southeast. It would have a narrower width facing along its east and west sides. The ancillary building would be located to the west of the residential tower, with a maximum height of 90 feet, and would be 40 feet high along the portion of the building that fronts Santa Monica Boulevard. (The reduced heights with the Automated Parking Option would be 40 feet and 20 feet, respectively.) The taller height of the ancillary building would be recessed into the project site, away from Santa Monica Boulevard. The ancillary building would also be substantially recessed into the project site from Moreno Boulevard and the Beverly Hills neighborhood to the east. The 43,141 square feet of outdoor landscaped open space on the ground level would 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 of the adjacent sidewalks.

During project construction, a 12-foot construction fence with aesthetic treatments would be provided to improve the existing character of the site and reduce the aesthetic impacts of temporary construction activity.

(b) Landscaping

The deep setbacks of the residential tower from the south property line and of the ancillary building from Moreno Drive would allow the development of broad, ground-level gardens in the southeast segment of the project site. As indicated above, approximately 43,131 square feet of ground-level landscaping, approximately 41 percent of the approximately 2.4-acre property, would be provided. As shown in Figure II-3, landscaped setbacks along Santa Monica Boulevard and Moreno Drive would create a green buffer between the sidewalk and valet areas and other internal activities. Mature trees, shrubs, and groundcover would be provided throughout the site and would be integrated with courtyards, lawns, and pedestrian walkways. Plantings, including tree species such as California sycamores, Brisbane box trees, evergreen elms, and tipu trees; and shrubs and groundcover including succulents, ornamental grasses, Carmel creeper, dwarf coyote brush, Manzanita, rosemary and agave species among others, would be used.

(c) Lighting and Signage

Exterior lighting would generally be provided at vehicle entry points and areas of circulation; points of entry into buildings; along the exterior façades of buildings; and other accessible outdoor areas for both architectural highlighting and security purposes. Lighting would primarily consist of a mix of standard incandescent light fixtures, as well as various types of efficient/low energy fixtures. Lighting would be designed and strategically placed to minimize glare and light spill onto adjacent properties. Specifically, any pole-mounted light fixtures located on-site or within the adjacent public rights-of-way would be shielded and directed towards the areas to be lit. Project-related signage would be discrete, commensurate with the high-quality architecture and landscaping.

(2) Aesthetic Character Impacts

(a) Construction Impacts

The project site is vacant, with an 8-foot-high construction fence surrounding the site. As such, the existing condition does not contribute to the visual quality or aesthetic value of the area. Construction of the project would require redevelopment of sidewalks; excavation; hauling, including export of excavated materials; and construction of below-grade foundations, the building itself, and landscaping. Construction activities would include the storage of equipment and materials and placement of a crane or cranes during the construction of the upper levels of the building.

Because no on-site, unique visual resources or prominent existing features would be removed or affected, construction would not cause the alteration or removal of existing visual resources. The construction of new buildings, sidewalk improvements, and installation of landscaping would be temporarily disruptive. Construction would occur over an approximately three year period.

Because of the short-term, temporary nature of the construction activities and the appearance of the site as a vacant, partially excavated construction site during the last several years, construction activities would not substantially alter, degrade, eliminate or generate long-term contrast with the visual character of the surrounding area or the existing project site. Therefore, impacts with respect to aesthetic value and

character would be less than significant. Notwithstanding, a 12-foot construction wall with aesthetic treatments, which would be provided as a project feature, would screen views of ground-level activities during construction and would improve the visual effect created by the existing wall.

(b) Operations Impacts

The Century City skyline and distinctive buildings within Century City are strong components of the area's aesthetic value. The project's proposed 39-story tower would result in greater density and building mass at the project site than under existing conditions. However, the proposed building would not be out of character with surrounding development within Century City. The predominant high-rise structures of Century City, which are visible from a great distance throughout the Los Angeles Basin, create a distinctive component of the west Los Angeles urban skyline.

The 39-story residential tower would be consistent with other modern high-rise buildings in Century City, including the existing 44-story Century Plaza Towers, the 36-story MGM Tower, the 39-story Fox Plaza building, and the 39-story AIG SunAmerica office tower. The height of the building would also be consistent with the recently approved 47-story 10131 Constellation Boulevard Towers, the 39-story residential tower approved as part of the New Century Plan within the Westfield Shopping Center, and the 40-story Century residential tower at the former site of the St. Regis Hotel. The project vicinity also includes buildings with lower heights, including the 15- and 19-story Northrop Plaza buildings, a 15-story building at 1880 Century Park East, 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 28-story, 1900 Avenue of the Stars building, the 21-story Century Park Plaza on Century Park East, the twin 23-story Watt Plaza Towers, and the 26-story 10100 Santa Monica Boulevard building. Other more moderate high-rise buildings in Century City include the; the 18-story Century Park Medical Plaza Tower; the 18-story Park Hyatt Hotel; and the 17-story Century Plaza Hotel and Spa.

The proposed project would contribute to the broad range of building heights across Century City and enhance Century City's skyline. In addition to allowing a deep setback along the south boundary with Beverly Hills High School and east boundary along Moreno Drive, the proposed project's tall, narrow profile would further facilitate open views into the project site's gardens and landscaped component, particularly from the Beverly Hills High School campus and from neighborhoods along Moreno Drive.

The proposed building would feature a unique, landmark-quality architectural design that would further complement existing modern building design in Century City. As a result of the absence of height limitations on buildings in Century City, and the hilly nature of Century City that enhances visibility, the cluster of towers rising up in Century City creates one of the region's most distinctive skylines and contributes to the aesthetic value of the area.

The project's appearance along Santa Monica Boulevard would be consistent with the general developed appearance of Century City. The large landscaped building setback would provide buffering between the building and travelers and pedestrians along Santa Monica Boulevard. The ground level architecture, with canopies, the cantilevered owners lounge and varied architectural treatments would provide a pedestrian scale for those in the immediate vicinity of the project.

The project's appearance along Moreno Drive would be dominated by the large landscaped setback and more notably the substantial landscaped open space. Again, the owner's lounge and architectural features would help to define a pedestrian scale for those in proximity to the project site, and give the project a residential appearance. The project's taller residential building would be located northwest of the multi-family neighborhood allowing landscaped distance between that building and the residential neighborhood.

Locations to the west and south of the project site do not present notable view conditions. The project site is abutted by alley-ways. office uses and the Beverly Hills High School Science and Technology Building. Project set-backs would be landscaped and provide separation between uses. The southern portion of the site, opposite to the Beverly Hills High School building would include the large landscaped open space area with considerable buffering and considerable distance to the project's higher tower.

In summary, the residential tower would be consistent with the established high-rise character of Century City, which includes a variety of contrasting building heights between high-rise buildings and surrounding low-rise communities. Because of the deep setbacks, consistency with existing development patterns in the area, and landscaped gardens to soften interfacing between the project site and low-rise properties to the east and south, the project would not substantially detract from the visual character of the area or alter, degrade, or eliminate existing features that contribute to the visual character of the area. Therefore, the project would have a less than significant impact with respect to visual quality and aesthetic character.

(3) Views

The proposed 39-story building would be visible, as a component of the Century City skyline, throughout the region and would potentially affect scenic views. Representative public viewing locations or vantage points were selected for analysis, inclusive of public streets and sidewalks adjacent to the project site and in the surrounding area that have existing views of identified view resources; and public parks and recreational fields. The representative views discussed below are indicative of the project impacts from more distant higher elevations in the larger region and hill-side areas.

The CEQA Threshold Guide describes view resources as "focal" or "panoramic."[5] View resources within the community that are available from public view locations in the project vicinity include: (1) views of the Century City skyline from near and distant view locations; (2) focal views of distinctive buildings, such as the AIG SunAmerica building, the MGM Tower, and the Century Plaza Towers; (3) focal views of development within and along the Avenue of the Stars scenic highway corridor; (4) panoramic views of the surrounding urban environment, such as the Los Angeles Country Club Golf Course; (5) panoramic horizon or mountain views from street corridors or other vantage points, and (6) panoramic views of the Westwood/Wilshire Boulevard high-rise skyline.

As shown above in Figures IV.A-1 through IV.A-3, views are currently available across the project site from east- and westbound Santa Monica Boulevard and from the vicinity of Moreno Drive. However, because of the proximity of existing high-rise buildings adjacent to the project site and mature vegetation along Santa Monica Boulevard, views of scenic resources across the project site are not available from adjacent locations represented in Figures IV.A-1 through IV.A-3.

[5] *City of LA CEQA Thresholds Guide, Section A.2, Obstruction of Views, page A.2-1.*

Composite simulations of the completed project within the broader setting are provided, in **Figures IV.A-4 through IV.A-16,** below to demonstrate the effect of the project on public views in the surrounding area. Each simulation figure contains an inset photograph of existing conditions. A legend identifying the respective view locations represented by the respective simulations is provided in **Figure IV.A-4**, *Location Map for Visual Simulations*.

The discussion of view impacts from each location below identifies the characteristics of the changes in views that would occur with construction of the proposed project. As indicated in the discussions below, the proposed project's residential tower would be highly visible from numerous locations. However, it would not block any existing or unique scenic resources, it would be consistent with the cluster of high rise buildings characterizing Century City, and it would not alter or change the character of any scenic areas. Further, in many instance, the project would add interest and variety to the Century City skyline. Therefore, impacts of the proposed project on views would be less than significant.

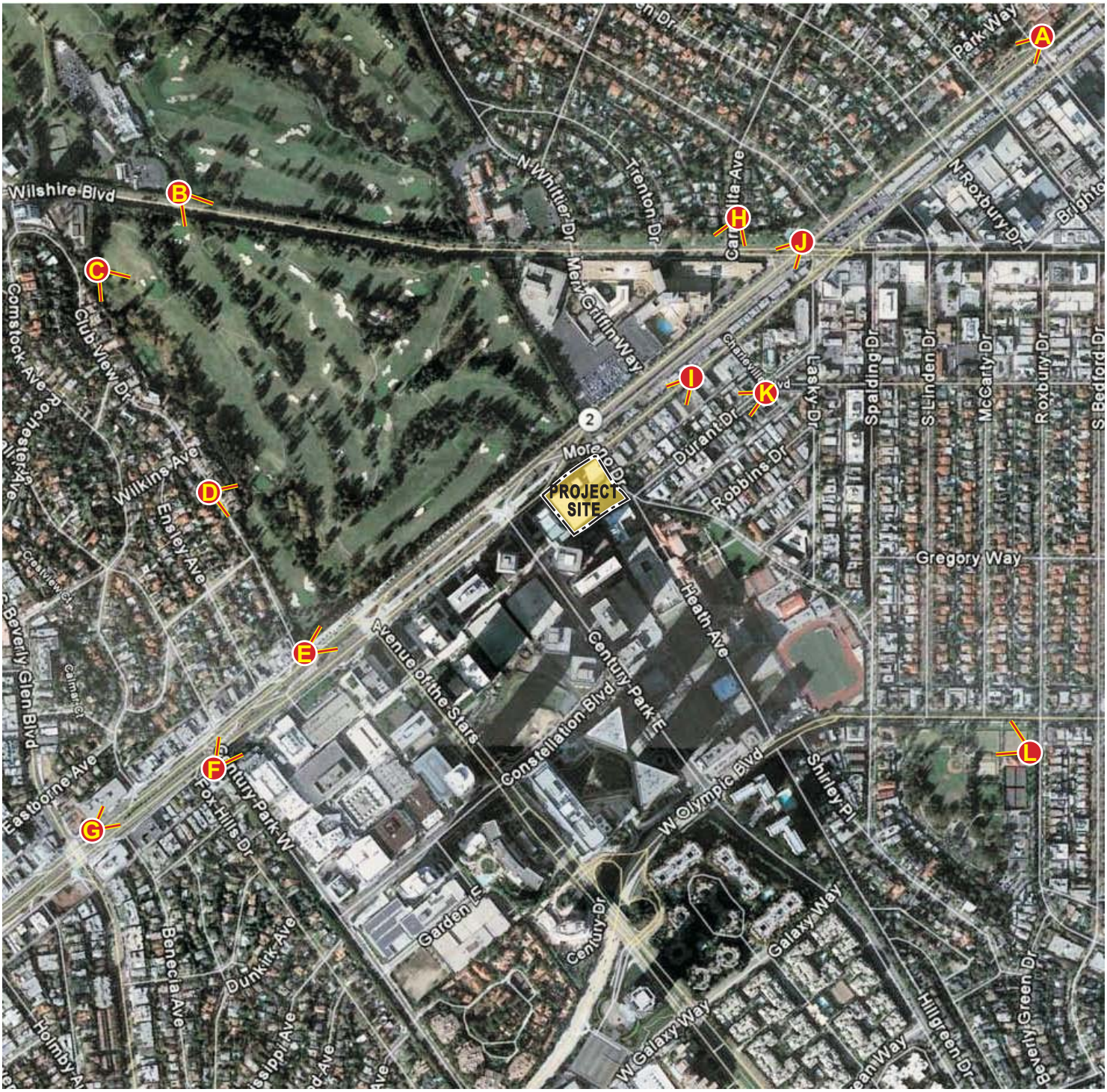
Composite View – Location A: The composite view Location A in **Figure IV.A-5**, *Views from the Intersection of Santa Monica Boulevard and Bedford Drive,* depicts the proposed residential tower as viewed from the intersection of Santa Monica Boulevard and Bedford Drive, to the northeast of the project site. From this location, the project's residential tower would be in a direct line-of-sight from Santa Monica Boulevard. The project would provide a new edge to the skyline, while blending into the buildings behind.

Composite View – Location B: The composite view Location B in **Figure IV.A-6**, *View from 10101 Wilshire Boulevard,* depicts the proposed residential tower as viewed from 10101 Wilshire Boulevard, to the north-northwest of the project site. From this location, the upper stories of the proposed residential tower would be visible. They would not block any views and would stand in the background, similar to other Century City buildings.

Composite View – Location C: The composite view of the proposed project in Location C in **Figure IV.A-7**, *View from the Los Angeles Country Club Golf Course,* depicts the proposed residential tower as viewed from the Los Angeles Country Club golf course, to the northwest of the project site. From this perspective, the project's residential tower would be directly visible within the Century City skyline. The proposed residential tower would lie in the background, not blocking any views and its appearance would be consistent with the cluster of Century City high-rise buildings.

Composite View – Location D: The composite view of the proposed project in Location D in **Figure IV.A-8**, *View from Club View Drive,* depicts the proposed residential tower as viewed from Club View Drive to the north of Eastborne Avenue, northwest of the project site. From this location, the upper stories of the proposed residential tower would be visible among the other Century City towers. However given its narrow construction, the building would lie in the background and would not block any views.

Composite View – Location E: The composite view of the proposed project in Location E in **Figure IV.A-9**, *View from the Intersection of Club View Drive and Santa Monica Boulevard,* depicts the proposed residential tower as viewed from the intersection of Santa Monica Boulevard and Club View Drive, to the southwest of the project site. From this location, the proposed residential tower would be visible along Santa Monica Boulevard along with, and blending into other Century City towers in the foreground. The proposed project



PCR

N

Photo Locations for Visual Simulations

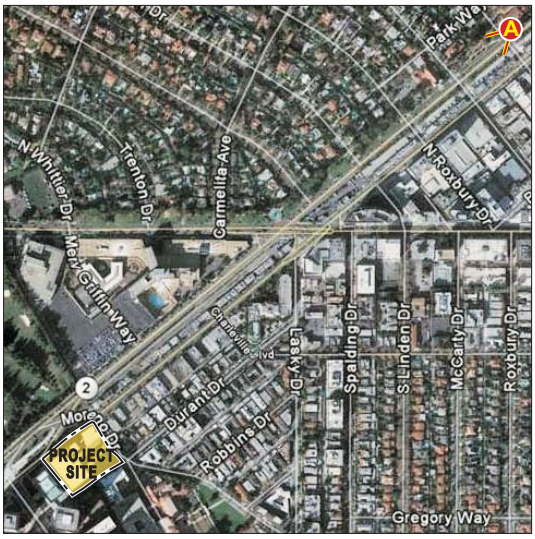
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-4

Existing



Proposed

PCR

View from the Intersection of Santa Monica Boulevard and Bedford Drive (Location A)

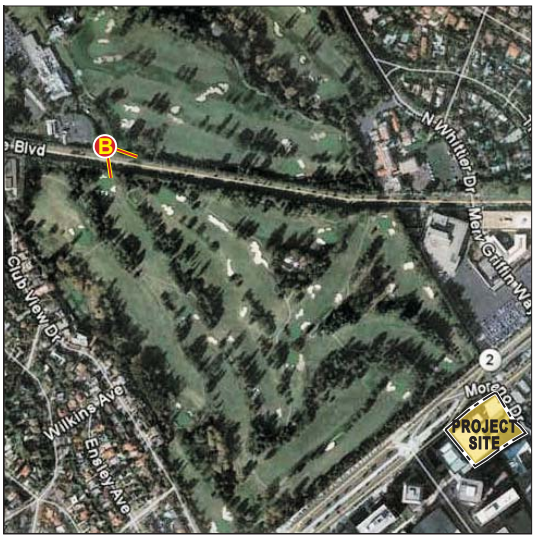
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-5

Existing



Proposed

PCR

View from 10101 Wilshire Boulevard (Location B)

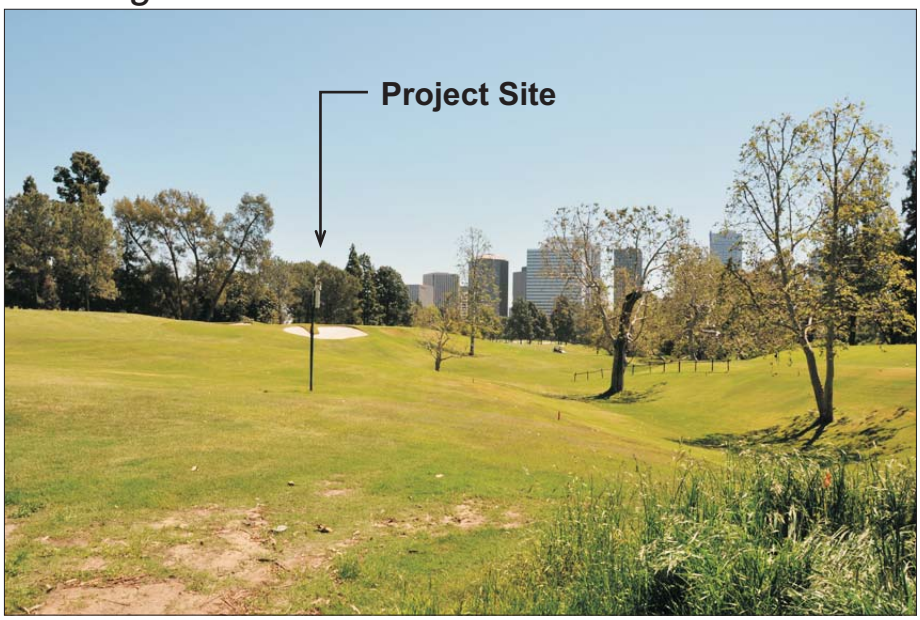
10000 Santa Monica Boulevard

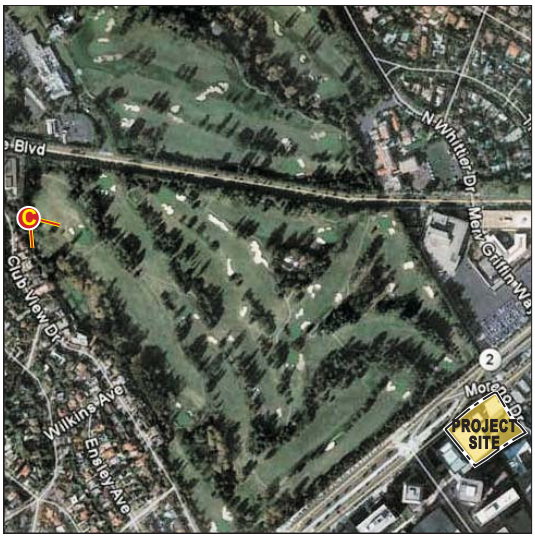
Source: PCR Services Corporation, 2011.

FIGURE

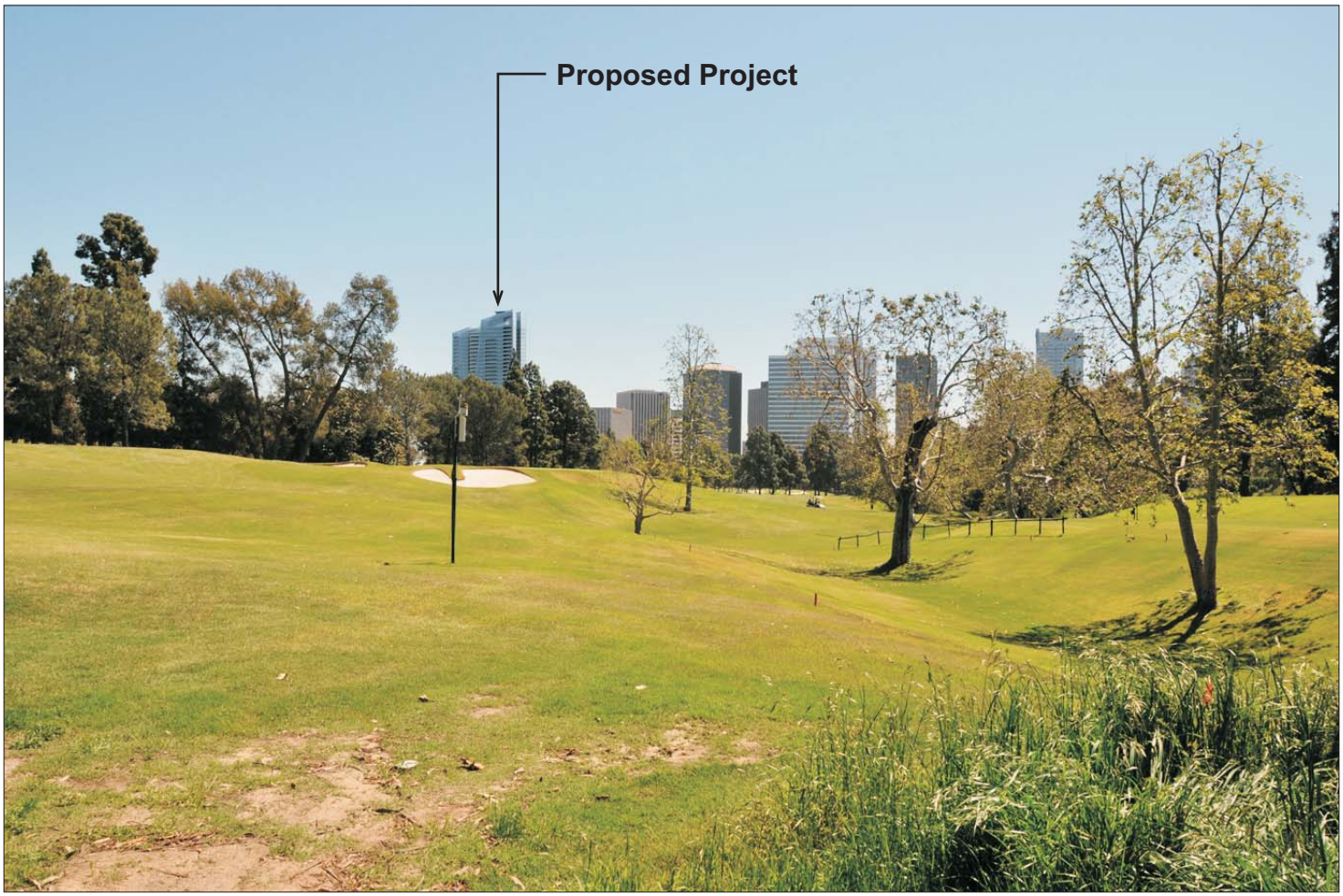
IV.A-6

Existing





Proposed



PCR

View from the Los Angeles Country Club Golf Course (Location C)

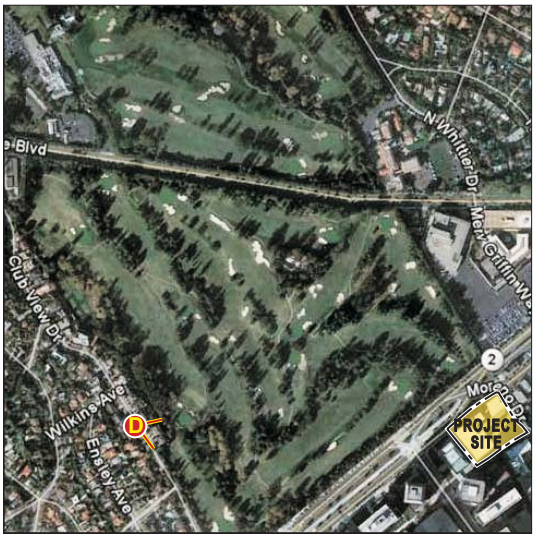
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-7

Existing



Proposed

PCR

View from Club View Drive (Location D)

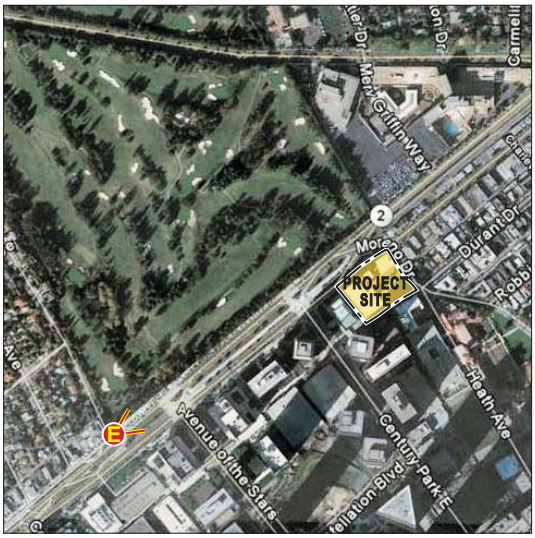
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-8

Existing



Proposed

PCR

View from the Intersection of Club View Drive and Santa Monica Boulevard (Location E)

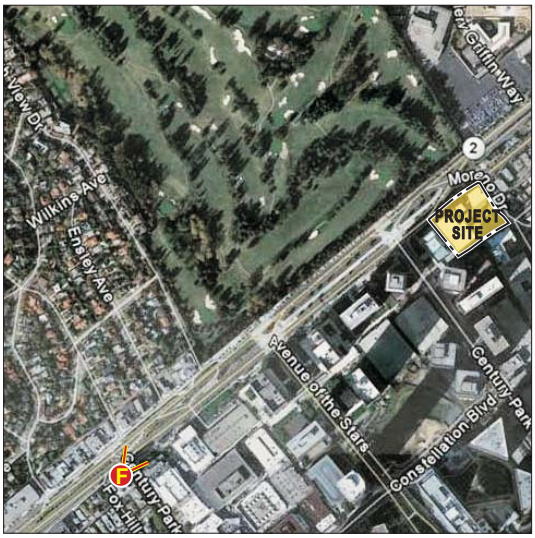
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-9

Existing



Proposed

PCR

View from the Intersection of Santa Monica Boulevard and Century Park West (Location F)

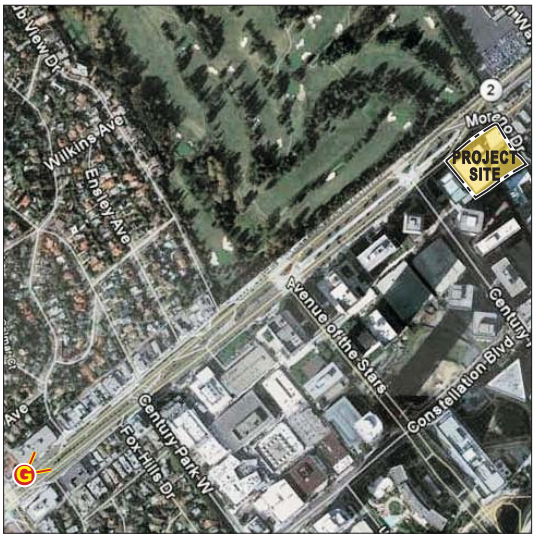
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-10

Existing



Proposed

PCR

View from the Intersection of Santa Monica and Beverly Glen Boulevards (Location G)

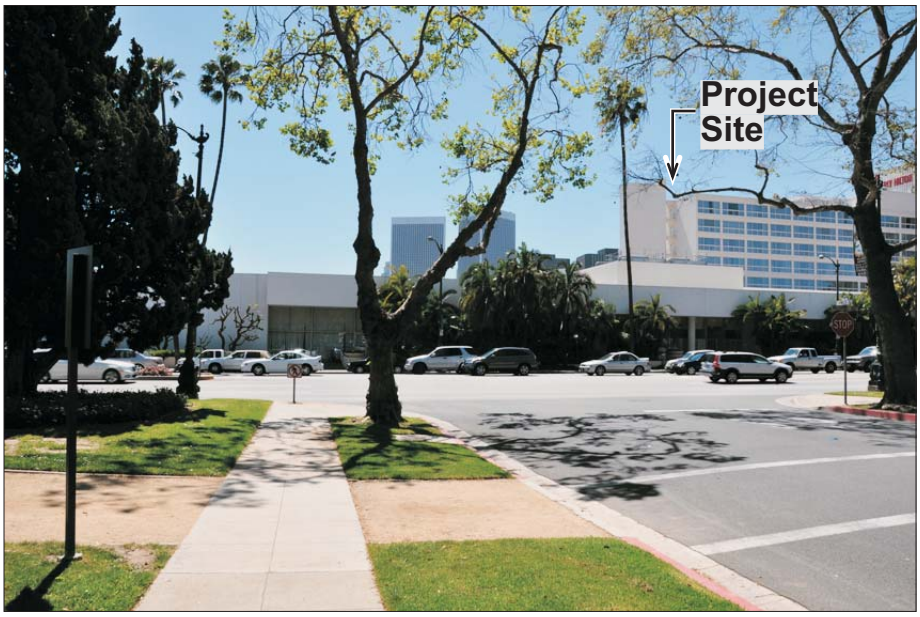
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-11

Existing



Proposed

PCR

View from the Intersection of Carmelita Avenue and Wilshire Boulevard (Location H)

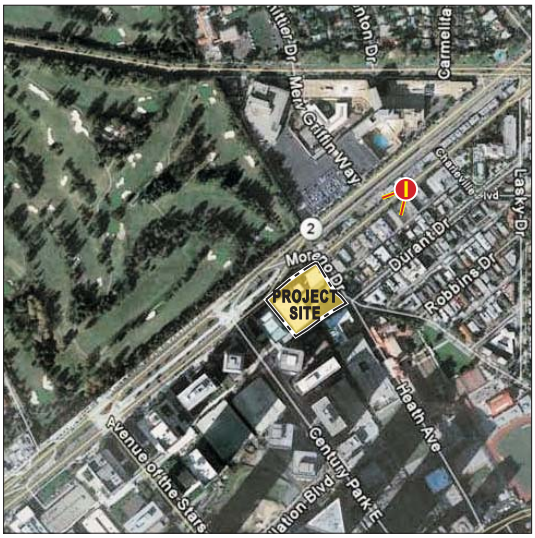
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-12

Existing



Proposed

PCR

View from 9935 Santa Monica Boulevard (Location I)

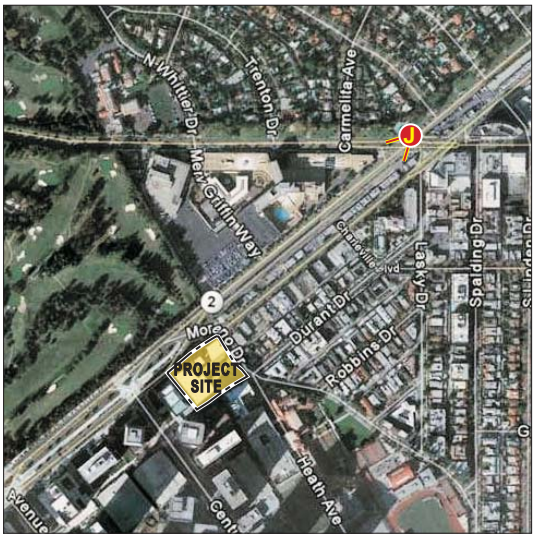
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-13

Existing



Proposed

PCR

View from the Intersection of Santa Monica and Wilshire Boulevards (Location J)

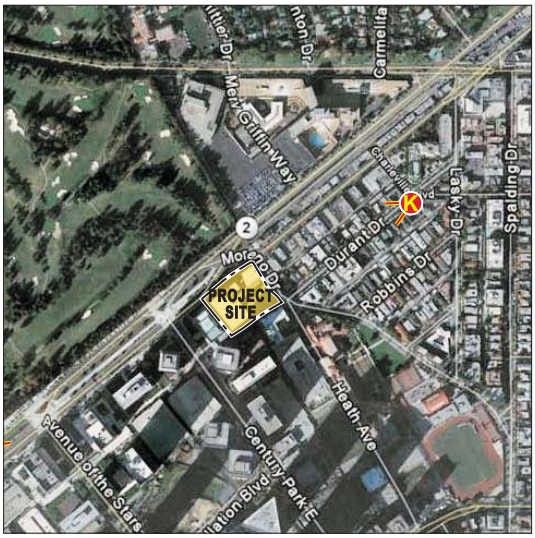
10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-14

Existing



Proposed

PCR

View from the Intersection of Charleville Boulevard and Durant Drive (Location K)

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-15

Existing

Proposed

PCR

View from the Intersection of Roxbury Park Drive and Olympic Boulevard (Location L)

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.A-16

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would not block views of any existing scenic resources from this location, and the residential tower would be consistent with the urban character of the area represented by the Century City high rise setting.

Composite View – Location F: The composite view of the proposed project in Location F in **Figure IV.A-10**, *View from the Intersection of Santa Monica Boulevard and Century Park West,* depicts the proposed residential tower as viewed from the intersection of Santa Monica Boulevard and Century Park West, to the southwest of the project site. From this location, the proposed residential tower would be only somewhat visible, blending with the Santa Monica Boulevard frontage.

Composite View – Location G: The composite view of the proposed project in Location G in **Figure IV.A-11**, *View from the Intersection of Santa Monica Boulevard and Beverly Glen Boulevard,* depicts the proposed residential tower as viewed from the intersection of Santa Monica Boulevard and Beverly Glen Boulevard, to the southwest of the project site. From this location, the proposed residential tower would be visible along Santa Monica Boulevard among the setting of Century City towers in the foreground. As the proposed residential tower would be located in the background of the Century City high rise cluster from this perspective, it would not appear as tall as many of the other Century City towers. From this location the project would blend into the general Century City milieu.

Composite View – Location H: The composite view of the proposed project in Location H in **Figure IV.A-12**, *View from the Intersection of Carmelita Avenue and Wilshire Boulevard,* depicts the proposed residential tower as viewed from the intersection of Wilshire Boulevard and Carmelita Avenue, to the northeast of the project site. From this location, the upper stories of the proposed residential tower would be visible behind an approximately six or seven-story building in the foreground. Due the angle of the proposed residential tower and setting with respect to other existing Century City buildings in the background, the proposed project would contribute to the interest and variety of the Century City skyline.

Composite View – Location I: The composite view of the proposed project in Location I in **Figure IV.A-13**, *View from 9935 Santa Monica Boulevard,* depicts the proposed residential tower as viewed from 9935 Santa Monica Boulevard, to the northeast of the project site. From this location, the project's residential tower would be within a direct line-of-sight from the street. It would give a new edge to Century City as travelers approach the project site. From this perspective, existing tallest buildings in the Century City cluster are generally screened by the foreground high rises (to the left of the proposed residential tower). Although highly visible, the proposed project would not block views of any existing scenic resources from this location, including any prominent skyline views, and would be consistent with the urban character of the area represented by Century City's high rise cluster.

Composite View – Location J: The composite view of the proposed project in Location J in **Figure IV.A-14** *View from the Intersection of Santa Monica and Wilshire Boulevards,* depicts the proposed residential tower as viewed from the intersection of Santa Monica and Wilshire Boulevards, to the northeast of the project site. The perspective provides a broad view of Century City's high-rise cluster, with the proposed residential tower, which is the nearest of the Century City high rises from the view location, highly visible along the north edge. The project would blend with the overall Century City building massing, and would contribute to the variety and character of Century City's existing high-rise cluster.

Composite View – Location K: The composite view of the proposed project in Location K in **Figure IV.A-15**, *View from the Intersection of Charleville Boulevard and Durant Drive,* depicts the proposed residential tower as viewed from the intersection of Charleville Avenue and Durant Drive, to the east of the project site. The perspective provides a view of the north edge of Century City along Santa Monica Boulevard. As the proposed residential tower appears in the foreground of Century City and would be taller than existing office high-rises that are immediately adjacent to the project site, it creates a taller skyline feature than the visible existing buildings. However, from this location, Century City's tallest high-rises, such as the 44-story Century Plaza Towers and the 47-story 10131 Constellation Boulevard Towers would be visible to the left of the photographed view field. In addition, the proposed Westfield New Century Plan's 39-story residential high-rise would also be visible along Santa Monica Boulevard in the background of the proposed project. The proposed residential tower would be generally consistent in height with Century City's other tallest buildings and would contribute to the variety and interest of the Century City skyline. Also, this is one of the few view locations from which the project's ancillary building would be visible. This lower element of the project would blend with the lower adjacent buildings creating varied height articulation. The building would not block views from this location. With implementation of the Automated Parking Option, the ancillary building would be reduced in height, thus having a lower impact on the visual setting from that shown in Figure IV.A-15.

Composite View – Location L: The composite view of the proposed project in Location L in **Figure IV.A-16**, *View from the Intersection of Roxbury Drive and Olympic Boulevard*, depicts the proposed residential tower as viewed from the intersection of Roxbury Drive and Olympic Boulevard (Roxbury Park), to the south the project site. The perspective provides a broad view of Century City's high-rise buildings. From this location, the mid- to upper stories of the residential tower's south façade would be visible and prominent in the skyline. As the proposed residential tower would be located within the same view field as other existing and proposed Century City towers, it would add to the overall Century City's skyline, as a distinct feature similar to the Century City Twin Towers.

(4) Light and Glare

(a) Construction

Lighting needed during project construction could generate light spillover in the vicinity of the project including residential uses to the north and southeast. However, construction activities would occur primarily during daylight hours and any construction-related illumination would be used for safety and security purposes only, in compliance with LAMC light intensity requirements. Construction lighting also would last only as long as needed in the finite construction process. Thus, with the implementation of existing LAMC regulations, artificial light associated with construction activities would not significantly impact residential uses, substantially alter the character of off-site areas surrounding the construction area, or interfere with the performance of an off-site activity. Therefore, artificial light impacts associated with construction would be less than significant.

Construction activities are not anticipated to result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Therefore, less than significant impacts with respect to reflected sunlight and natural glare are anticipated.

(b) Operation

(i) Artificial Light

The proposed project would incrementally increase the relatively high levels of ambient light under the existing conditions. Light sensitive land uses in the area include residential uses along Durant and Robbins Drive in the City of Beverly Hills. New light sources would include light from windows of the residential tower during the evening hours. Although such lighting has the potential to create a "glow" effect around the proposed project and increase ambient light in the area, such interior lighting is associated with the tower's residential use and would greatly diminish as residents retire. The increase in ambient lighting is not expected to interfere with activities in nearby residential neighborhoods, in which interior lighting follows a similar pattern (ceasing when residents retire for the night). In addition, the increase in ambient lighting resulting from interior lighting would not impact nearby office buildings or the Beverly Hills High School, which would generally not be operating during the late evening.

Exterior lighting would consist of security and wayfinding lighting provided at vehicle entry points and areas of circulation; points of entry into buildings; along the exterior façades of buildings; and other accessible outdoor areas (i.e., the outdoor garden) for both architectural highlighting and security purposes. Lighting for architectural highlighting would likely occur from dusk to midnight to compliment the artistic design of the development and enhance its view from adjacent areas. Project-related signage would be discrete and commensurate with the high-quality architecture and landscaping.

Lighting for security purposes would occur from dusk to dawn to ensure the safety of residents and visitors. Lighting would primarily consist of a mix of standard incandescent light fixtures, as well as various types of efficient/low energy fixtures. Lighting would be designed and strategically placed to minimize glare and light spill onto adjacent properties. Specifically, any pole-mounted light fixtures located on-site or within the adjacent public rights-of-way would be shielded and directed towards the areas to be lit and away from adjacent sensitive uses. In addition, all project lighting would comply with the LAMC requirements listed above that have been established to limit light spill on light-sensitive (residential) uses.

Based on the above, with the implementation project design features and applicable LAMC regulations, lighting associated with the project would not substantially alter the character of the off-site areas surrounding the project and would not interfere with the performance of an off-site activity. Impacts attributable to project-induced artificial lighting would be less than significant.

(ii) Glare

Daytime glare can result from sunlight reflecting from a shiny surface that would interfere with the performance of an off-site activity, such as the operation of a motor vehicle. Reflective surfaces can be associated with window glass and polished surfaces, such as metallic or glass curtain walls and trim. The proposed residential tower would be constructed with clear glass, fritted glass (glass treated to provide some opacity, texture, and reduce reflectivity), metal panel, aluminum and stone, and would not be notably reflective.

The proposed residential tower would be prominently visible from east- and westbound Santa Monica Boulevard, and visible as part of the Century City skyline from more distant areas of high topography, such as the Hollywood Hills to the north and Baldwin Hills to the south, and from adjacent Beverly Hills High School

and residential neighborhoods and streets in Beverly Hills to the south and southeast. The project's ancillary building would be located within the project site, and would be treated with landscaping, thus minimizing any potential glare impacts.

The least potential for reflection would occur along the residential tower's north and east façades, as viewed from properties to the north and from southbound streets (in this area, "westbound" Santa Monica Boulevard actually approaches from the northeast, and may be considered "southbound"). The residential tower's potential for sun reflection would be greater along the west façade, which would have the potential to reflect sunlight on vehicles along "eastbound" Santa Monica Boulevard ("eastbound" Santa Monica Boulevard actually approaches from the southwest, a direction having great glare potential).

Another potential for glare from reflected sunlight would occur along the residential tower's south façade, particularly during the winter months when the sun is low in the sky. Classrooms located within the adjacent, four-story Beverly Hills High School Science and Technology Building to the south, high school playing fields to the southeast, and northbound vehicles along Moreno Drive may be considered potentially sensitive to sun-reflected glare from the tower's south façade. Surface materials on the residential tower could also cause glare during the afternoon at the east-facing offices of the Northrop Center's east tower.

In order to ensure that the residential tower's window glass and architectural materials would not cause glare from reflected sunlight at any other glare-sensitive locations, review of all building materials by the Department of Building and Safety to ensure that highly reflective materials are not utilized along the building facades is recommended as a mitigation measure. With the implementation of the proposed mitigation measure, potential glare from the building façade would not substantially alter the character of off-site areas surrounding the project site.

(5) Shading

The proposed project would add new structures to the project site including the 39-story residential tower. The shading impacts that would occur from the new project buildings were evaluated pursuant to the *City of L.A. CEQA Thresholds Guide,* and also pursuant to a shading standard established in the CCNSP. In order to determine the extent of the shading from these uses, shading diagrams were prepared to indicate the shading patterns that would occur during the times specified in the *City of L.A. CEQA Thresholds Guide* and the *CCNSP*. Uses that would be sensitive to shading impacts include outdoor areas associated with single and multi-family residences, schools, parks, pedestrian plazas, outdoor dining areas, golf courses, and hotel swimming pools and recreation areas. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce.

(a) Impacts Regarding the L.A. CEQA Thresholds Guide Criteria

Shading diagrams are presented for winter and summer solstices as well as the spring and fall equinoxes in **Figures IV.A-17 through IV.A-20,** below. Shadows for all other times of the year can be interpolated between these four seasons and would not exceed the shadows identified as occurring at these four points in time. Shadow lengths, based on proposed on-site building heights, are identified for specific times of the day and vary according to the season of the year.

(i) Winter Solstice

Figure IV.A-17, *Winter Solstice Shadows-December 21*, below, depicts the winter solstice shading pattern that would be created by the project's residential tower. As shown in Figure IV.A-17, the project's 9:00 A.M. shadow would extend to the north of Santa Monica Boulevard onto the Los Angeles Country Club Golf Course. Under the *CEQA Thresholds Guide*, the golf course, an outdoor recreational use, is considered shade-sensitive, as sunlight is important to function, physical comfort, or commerce related to golf course activities. Throughout the morning hours, the project's shadow would move easterly leaving those areas where golfing activities occur just prior to 12:00 noon. A large portion of the shaded area includes trees that are not sensitive uses and that cast their own shadows on adjacent areas. The shading would continue to affect a small landscaped shaded corner of the golf course that is heavily vegetated with large trees, casting their own shadows until about 12:20 P.M. No single location or green within the golf course would be continuously shaded by the project for more than two hours. Golfer exposure to shading would be slight, and similar to shading that already affects the golf course from existing buildings and golf course landscaping.

As also shown in figure IV.A.18, the area of the golf course that would receive shading from the proposed project is distinct from shading that is occurring from other existing uses in the project vicinity, and the areas shaded by the project would not be subject to longer shading effects at those locations. As a result, not only would impacts on golfers be limited, impacts on golf course sod which requires sunlight for photosynthesis would not be exposed to shading greater than two hours, thus leaving considerable sunlight throughout the majority of the day for photosynthesis. Therefore, shade impacts on the golf course would be less than significant.

During the afternoon hours, the project's shadow would extend over existing commercial land uses in the City of Beverly Hills, including the 9900 Wilshire Project site north of Santa Monica Boulevard. The proposed project would cast an arc of shadows over the latter use from approximately 11:00 A.M. to 1:00 P.M. Thus, shading would not occur for more than three continual hours prior to 3:00 P.M. The proposed project's shadow would not cross the multi-family residential area south of Santa Monica Boulevard prior to 3:00 P.M., thus shading impacts of this multi-family area during the winter solstice would be well below the significance threshold. In addition, no shading of the Beverly Hills High School would occur during the day. Because the proposed project would not provide continuous shading for more than three consecutive hours during the winter solstice at any location, it would have a less than significant impact.

(ii) Spring Equinox

Figure IV.A-18, *Spring Equinox Shadows-March 21***,** depicts the spring equinox shading pattern that would be created by the project. As shown in Figure IV.A-18, the project's 9:00 A.M. shadow would extend north of Santa Monica Boulevard onto the Los Angeles Country Club Golf Course. Shading would leave the golf course at about 12:30, a duration of about 3.5 hours. As was the case for winter, much of the shading would occur in areas already shaded by existing trees. No single location or green within the golf course would be continuously shaded for than about two hours. Also, as was the case for winter, the areas shaded by the proposed project would not be subject to shading at the same location by other existing buildings, limiting the amount of continuous shading on turf areas. Therefore, shade impacts on the golf course would be less than significant.

During the afternoon, the proposed residential tower would shade commercial and multi-family areas within the City of Beverly Hills. However, as shown in Figure IV.A-18, the proposed project would not shade any

shade-sensitive uses in the City of Beverly Hills for more than three continual hours. Specifically, shadows from the project would extend to the east but would not reach any residential units prior to 3:30 P.M. Shading of these uses from the proposed project would be well under the three hour significance threshold, and shading impacts during the spring equinox would be less than significant.

(iii) Summer Solstice

Figure IV.A-19, *Summer Solstice Shadows-June 21,* depicts the summer solstice shading pattern that would be created by the project's residential tower. As shown in Figure IV.A-19, the project's 9:00 A.M. shadow would extend north of Santa Monica Boulevard onto the landscaping/trees located along the southern edge of the Los Angeles Country Club Golf Course. The project's shadow would exit the golf course by about 9:30 A.M. Therefore, the proposed project would not result in significant shading impacts to the golf course during the summer solstice.

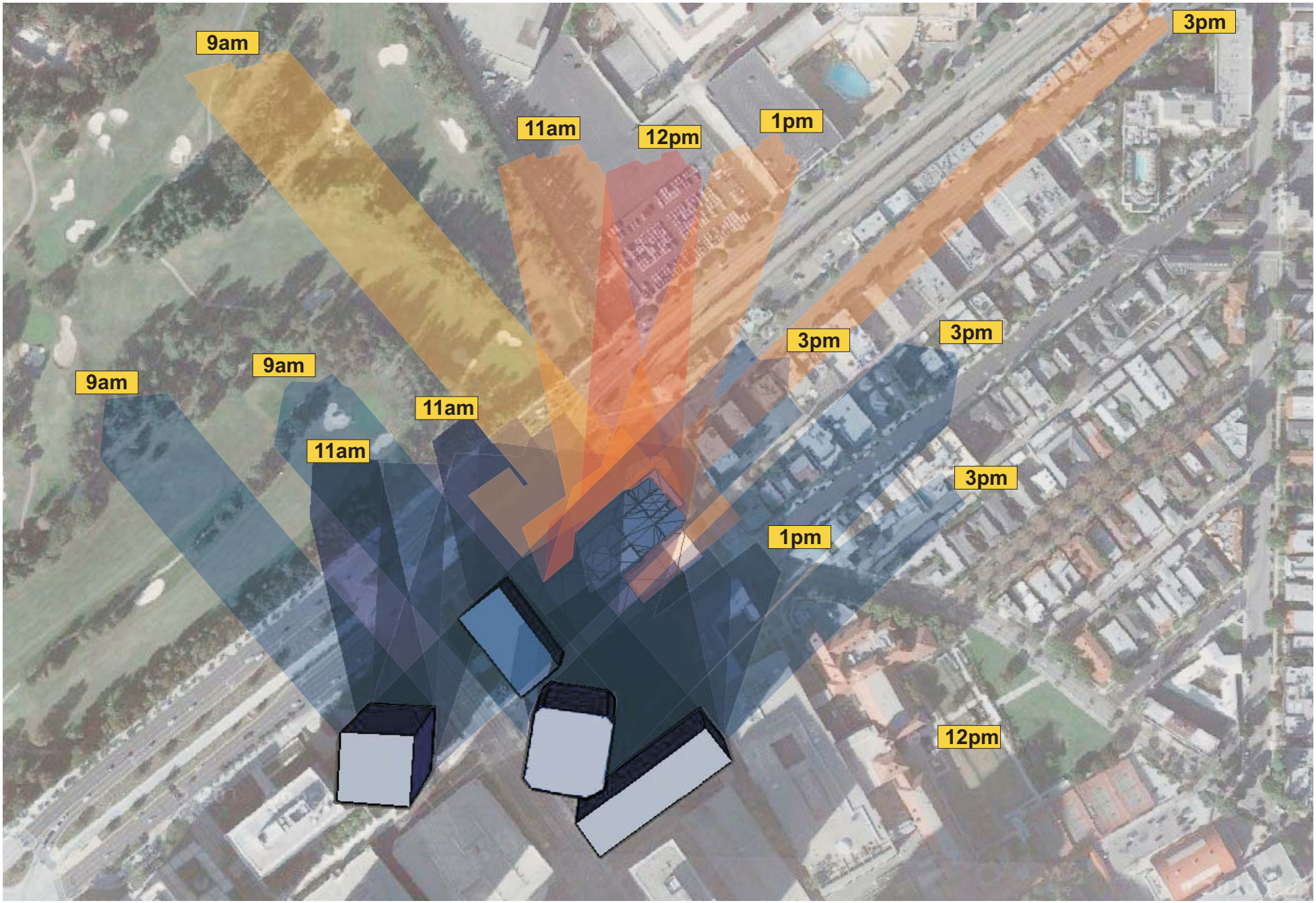
During the afternoon hours, the proposed residential tower would shade areas within the City of Beverly Hills, including the multi-family residential neighborhood to the east. Shading would not reach any residential location until about 2:15 P.M. in the afternoon. Therefore, the maximum amount of shading at any residential location between 2:15 P.M. and 5:00 P.M., would be approximately 2.75 hours, substantially less than the four hour summer threshold and less than significant.

As shown in Figure IV.A-19, the proposed project would cast a shadow over portions of the Beverly Hills High School campus in the late afternoon, beginning at about 5:00 P.M. Therefore, given the late afternoon exposure, the project would shade the high school for far less than four hours between 9:00 A.M. and 5:00 P.M. and impacts would be less than significant.

(iii) Fall Equinox

Figure IV.A-20, *September 21 – Autumnal Equinox Shadows*, below, depicts the fall equinox shading pattern that would be created by the project. As shown in Figure IV.A-20, the project's 9:00 A.M. shadow would extend north of Santa Monica Boulevard into the Los Angeles Country Club Golf Course. The project's shadow would move easterly leaving the golf course at about 12:30 P.M. The project's shadow would not continually shade any single location in the golf course for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. The longest duration of shading at any single location would be about two hours on a landscaped area along the southern edge of the golf course. Therefore, impacts on the golf course would be less than significant.

During the afternoon hours, the proposed residential tower would shade commercial and multi-family residential areas, east of Moreno Drive, within the City of Beverly Hills. Beverly Hills High School would not be shaded at all during the fall equinox. The proposed project would begin to cast shadows on a portion of the multi-family residential area beginning at about 3:15 P.M. The maximum shading duration at any location would be about 1.75 hours during the evaluated time period. Because the proposed project would not shade any sensitive land uses within the cities of Los Angeles and Beverly Hills for more than four consecutive hours during the fall equinox, it would have a less than significant impact.



PCR

N

December 21 - Winter Solstice Shadows

Existing Off-Site Building Shadows

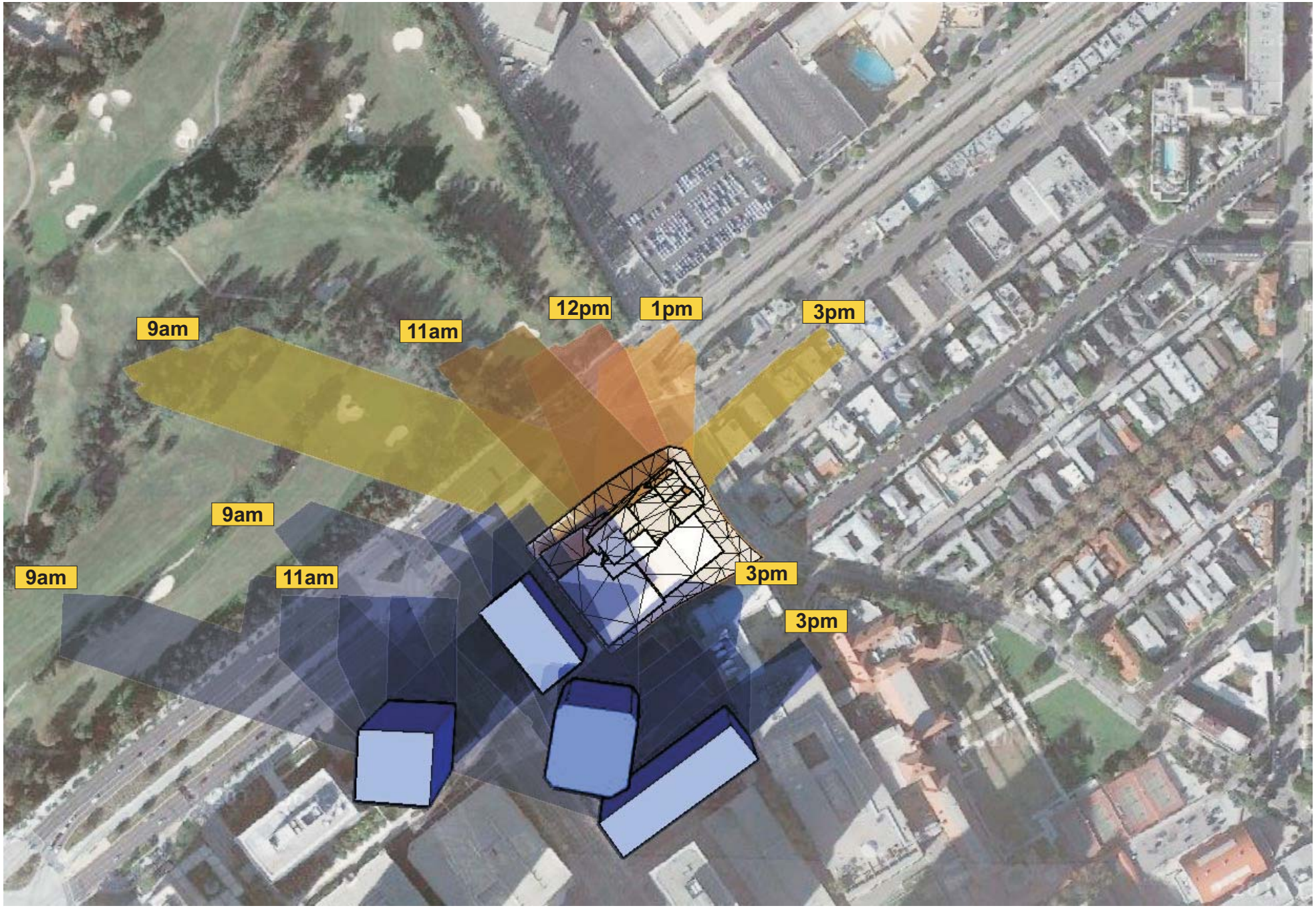
Proposed Project Shadows

10000 Santa Monica Boulevard

Source: PCR Services Corp., 5/2011

FIGURE

IV.A-17



PCR

N

March 21 - Spring Equinox Shadows

Existing Off-Site Building Shadows

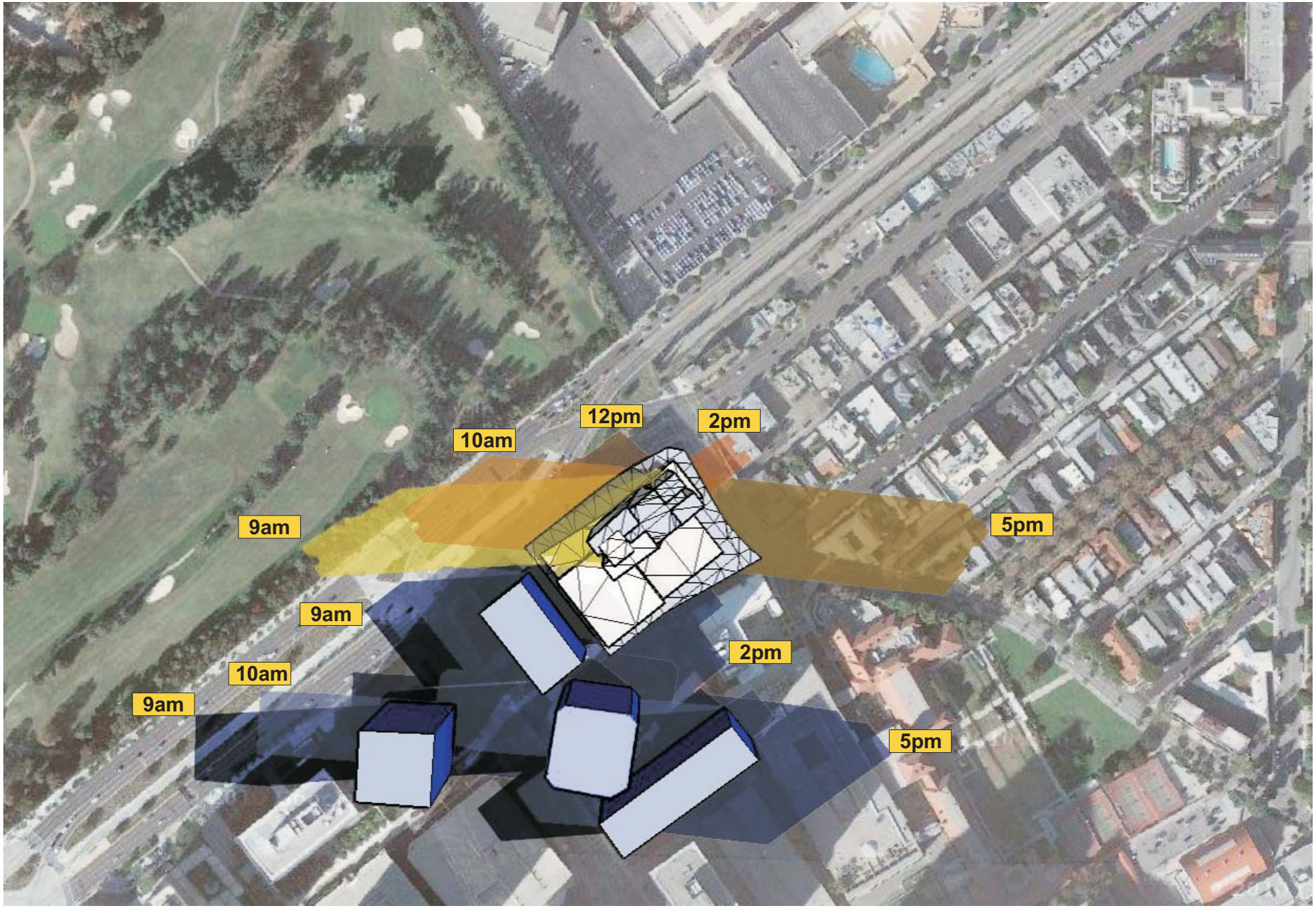
Proposed Project Shadows

10000 Santa Monica Boulevard

Source: PCR Services Corp., 5/2011

FIGURE

IV.A-18



PCR

N

Existing Off-Site Building Shadows

Proposed Project Shadows

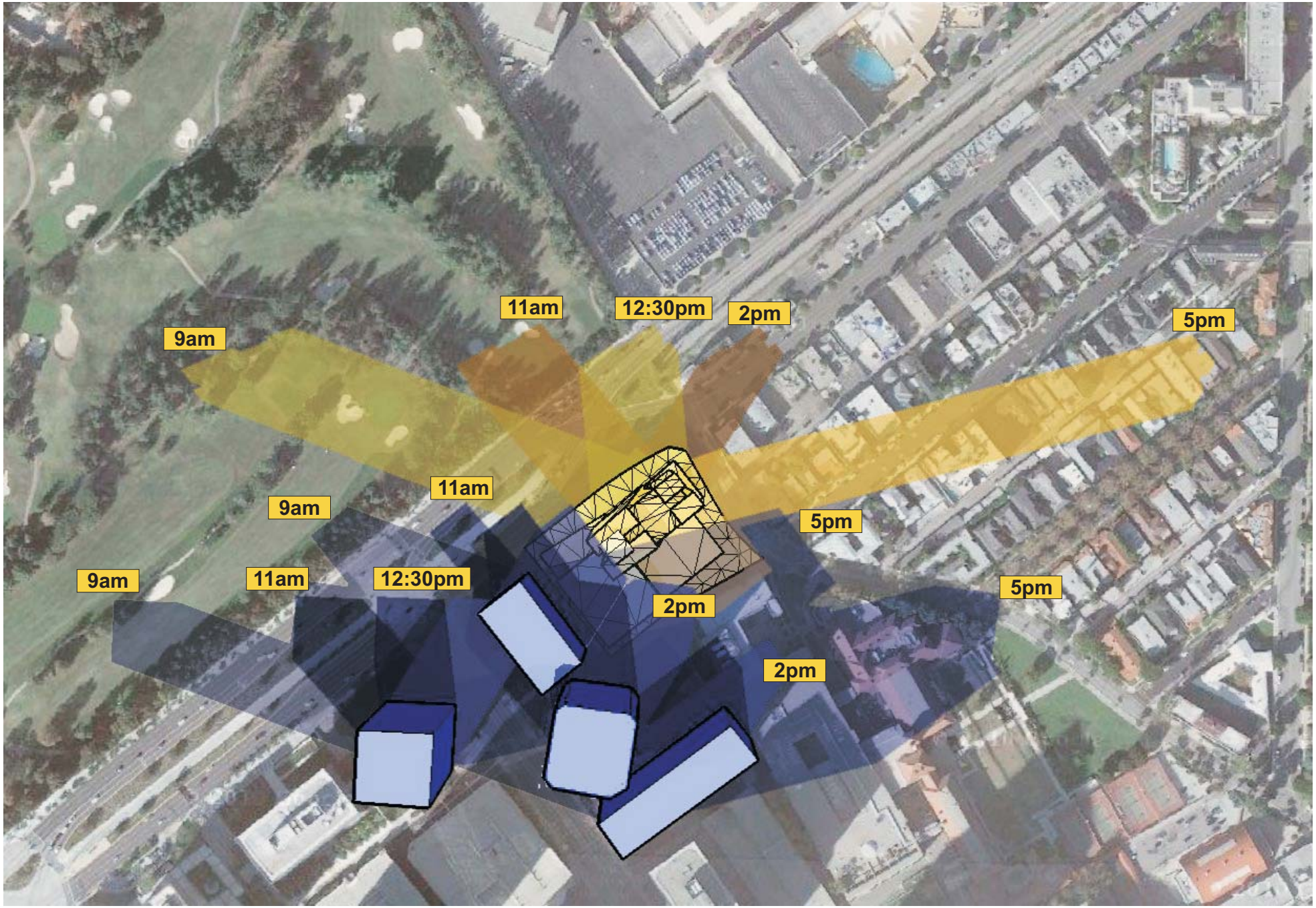
June 21 - Summer Solstice Shadows

10000 Santa Monica Boulevard

Source: PCR Services Corp., 5/2011

FIGURE

IV.A-19



PCR

N

September 21 - Fall Equinox Shadows

Existing Off-Site Building Shadows

Proposed Project Shadows

10000 Santa Monica Boulevard

Source: PCR Services Corp., 5/2011

FIGURE

IV.A-20

(b) Impacts Regarding the CCNSP Shading Standard

CCNSP Sections 3.C.1.b states that "A Project shall be designed in a way to reasonably assure that it will not cast a shadow for more than two hours between 8 A.M. and 8 P.M., upon any detached single-family dwelling located outside the Specific Plan Area." An analysis was performed to determine whether the two-hour standard would be exceeded at any single-family dwelling unit outside of the Specific Plan area. There are no single-family residential units located in the City of Los Angeles outside of the Specific Plan area that could be potentially impacted by shade from the project.

One single-family residential unit was identified that could be subject to shading in the project vicinity, however this unit is located in the City of Beverly Hills, on Durant Drive, in an area zoned multi-family and occupied by multi-family homes. Thus the single-family unit is an inconsistent use in a multi-family zoned area. Further, the City of Beverly Hills does not apply the CCNSP's shade standard – a City of Los Angeles policy - in EIRs for Beverly Hills' own projects. Based on the shading threshold used in recent Beverly Hills EIRs, the project would not have a significant impact on this Beverly Hills single-family unit. Beverly Hills has most recently applied the *L.A. CEQA Thresholds Guide* threshold in its EIRs, pursuant to which the project would result in a less than significant shade impact. Beverly Hills also applied a qualitative standard in the 9900 Wilshire project EIR, according to which "a project would have a significant impact if it would ... create a new source of shade or shadow which would adversely affect existing shade/shadow-sensitive structures or uses." Given that the single-family unit has a small outdoor area that is currently subject to shading from existing buildings and landscaping, particularly in the late afternoon; that shading effects would occur in limited times of the year; and, in particular, that such shading would occur in the summer and other warmer parts of the year when late afternoon shading can provide relief from heat buildup, the project would also not exceed this Beverly Hills shade/shadow threshold.

However, conservatively applying the Specific Plan's standard outside of the City of Los Angeles, the project would shade the single-family residential unit located in Beverly Hills for more than two hours between 8:00 A.M. and 8:00 P.M. The greatest level of shading at that location occurs during the summer when shadows reach the single-family unit at about approximately 2:45 in the afternoon and leave the unit at approximately 6:15 P.M. Thus, very conservatively applying a City of Los Angeles policy to a Beverly Hills home, the project would result in significant shade/shadow impacts on one single-family residential unit for about half the year. The project would not result in any shade/shadow impacts to single-family homes located in the City of Los Angeles under this standard.

(6) Policy and Regulatory Compliance

(a) City of Los Angeles General Plan

(i) General Plan Framework Element

A comparison of the proposed project's design features to the General Plan Framework Element, Chapter 5, Urban Form and Neighborhood Design, policies is provided in detail in **Table IV.A-1,** *Comparison of the Project to the Urban Form and Neighborhood Design Policies of the General Plan Framework*. As shown in Table IV.A-1, the project would be consistent with the aesthetic policies set forth in the City's General Plan Framework. Primary aesthetic goals of the General Plan Framework are intended to promote pedestrian activity and to provide a quality experience for the City's residents.

Table IV.A-1

Comparison of the Project to the Urban Form and Neighborhood Design Policies of the General Plan Framework

Recommendation	Analysis of Project Consistency
Goal 3L: Districts that promote pedestrian activity and provide a quality experience for the City's residents.	**Consistent.** The proposed project would locate a residential use in a highly urbanized area and within walking distance of retail, restaurant, entertainment, and other commercial uses, including a strong employment base. In addition, in accordance with the *Greening of Century City Pedestrian Connectivity Plan (see* Chapter IV.H, *Land Use),* the proposed project would enhance Century City as a sustainable, walkable neighborhood. The project would improve the currently vacant, degraded project site with new landscaping and sidewalks that would enhance the travel experience for pedestrians traveling between Century City and Beverly Hills.
Policy 5.2.2.c: Regional Centers should contain pedestrian oriented areas.	**Consistent.** The introduction of a high-density residential use within walking distance of a range of commercial uses, shopping, restaurants, retail, and employment within the Century City Regional Center would increase pedestrian activity and enhance the pedestrian orientation of the Regional Center. The project's proposed landscaping improvements along Santa Monica Boulevard and Moreno Drive and architectural and landscape lighting, would support a positive pedestrian experience.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**Consistent.** The project would provide landmark quality architectural design and landscape amenities that would improve the public experience of Century City and contribute to Century City's aesthetic skyline.

Source: PCR Services Corporation, 2011

As discussed in Table IV.A-1, the proposed project would be consistent with General Plan Framework policies to promote pedestrian activity and to provide a quality experience for the residents of the City. The project would locate residential uses in a highly urbanized area and within walking distance of retail, restaurant, entertainment, and other commercial uses, including a strong employment base. The proximity of a broad range of interconnected land uses within walking distance would stimulate pedestrian activity and provide a quality experience for residents.

The project would replace the vacant degraded site with distinctive architecture, inclusive of canopies and a cantilevered owners lounge that help to define an attractive pedestrian level for pedestrians along Santa Monica Boulevard and Moreno Drive. Further, improved sidewalks, landscaping and site lighting would be provided along these frontages, further enhancing the pedestrian experience and livability of the neighborhood, while contributing to Century City's aesthetic skyline. Since the project would comply with the urban design policies of the General Plan Framework, the impact of the project with respect to General Plan Framework policy and regulatory compliance would be less than significant.

(ii) General Plan Transportation Element

As indicated above, Santa Monica Boulevard is considered a Scenic Highway under the General Plan Transportation Element. The Transportation Element's "Scenic Highways Guidelines" (Transportation Element, Section D) are primarily focused on the physical characteristics of the public rights-of-ways. These characteristics are addressed as the following subsections: 1) Roadway, 2) Earthwork/Grading, 3) Planting/Landscaping, 4) Signs/Outdoor Advertising, and 5) Utilities.

All of these sub-sections are silent as to how structures of any size may contribute to the "character [of] what should be located on a Scenic Highway." The project would be consistent with the Transportation Element's landscaping and signage requirements and would provide underground utilities, as required. In addition, the proposed project would not include any features that would be in conflict with this designation. Since no "Scenic Feature or Resource" for Santa Monica Boulevard is noted in the Transportation Element's "Inventory," the project will have no impact on any scenic resources associated with Santa Monica Boulevard. The height and massing of the project would be similar to the height and massing of existing development within Century City and along Santa Monica Boulevard and, thus, would be consistent with the visual features that currently distinguish this roadway. Thus, impacts with respect to the Scenic Highway designation of Santa Monica Boulevard would be less than significant.

(iii) West Los Angeles Community Plan

The West Los Angeles Community Plan implements the Urban Form and Neighborhood Design policies of the General Plan Framework. Under the Community Plan, projects must comply with the applicable urban design policies outlined in the Community Plan, to the maximum extent feasible. The Community Plan design policies and guidelines are intended to ensure that projects incorporate specific elements of good design, the intent of which is to promote a stable and pleasant environment that encourages both pedestrian and economic activity. A comparison of the project to the Community Plan's applicable design policies and guidelines is presented in **Table IV.A-2,** *Consistency of the Project with the Applicable Urban Design Policies of the West Los Angeles Community Plan*.

As discussed in Table IV.A-2, the project would be consistent with the Community Plan's light and glare, multi-family site planning, and community design and landscaping guidelines. The project would provide security and architectural lighting only, and would enhance community appearance through the development of a unique landmark quality building. The proposed project would use complementary building materials on building façades and exhibit an architectural theme that would incorporate modern design elements. In addition, the proposed project would be consistent with Community Plan policies to incorporate varying design. Conceptual architectural plans indicate a strong use of variation in the quadrant design and different vertical and horizontal planes, with varied wall angles, a strong cantilevered feature at the entrance, and other features to create building distinction. All trash collection and rooftop equipment and appurtenances would be screened from view.

The proposed project would be consistent with Community Plan policies to provide improvements along principal streets and at major identified intersections and edges which clearly distinguish these as major entries. In its location at the northeast corner of Century City, the proposed project would represent a gateway development, as approached from the east via Santa Monica Boulevard, and give distinction to the project site as an entrance to Century City.

Table IV.A-2

Consistency of the Project with the Applicable Urban Design Policies of the West Los Angeles Community Plan

Design Policies for Individual Projects	Analysis of Consistency
Light and Glare	
Installing on-site lighting along all pedestrian walkways and vehicular access ways.	**Consistent:** Pedestrian walkways, including public sidewalks and the interior pedestrian courtyards and walkways, would be lighted to provide security and visibility during the evening hours. Driveways would be lighted to enhance wayfinding and security.
Directing on-site lighting onto driveways and walkways, directed away from adjacent residential uses.	**Consistent:** Lighting for security and wayfinding would be directed onto the sidewalks and driveways and away from nearby, off-site residential uses.
Multi-Family	
Site Planning: All multi-family residential projects of five or more units shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents.	**Consistent.** The project would be designed around a landscaped, ground level open space/garden area with such features as landscaping, garden walkways, seating areas, water features, etc. that would serve as a focal point and site amenity for residents.
Design: The design of all buildings should be of a quality and character that improve community appearances by avoiding excessive variety or monotonous repetition. Achievement of this can be accomplished through: 1. Requiring the use of articulations, recesses, surface perforations and/or porticoes to break up long, flat building façades.	**Consistent.** The project's architecture includes a strong use of articulation in building design, with quadrant volumes, angles added to the vertical and horizontal planes and roof level, strong cantilevered features at the entrance, and owner's lounge and other features to create building distinction.
2. Utilizing complementary building materials on building façades.	**Consistent.** The proposed project's buildings would exhibit a common architectural theme in its modern structural and design elements.
3. Incorporating varying design to provide definition for each floor.	**Consistent.** The proposed residential tower would feature varied materials and architectural treatments that would provide horizontal variation at each floor level.
4. Integrating building fixtures, awnings, or security gates, into the design of buildings.	**Consistent.** The project would integrate all building fixtures, including exterior light fixtures, gates and fencing, and any visible mechanical fixtures into the residential tower design theme.
5. Screening of all roof top equipment and building appurtenances from view.	**Consistent.** All rooftop equipment and appurtenances would be screened from view.
6. Requiring decorative masonry walls to enclose trash.	**Consistent.** The trash collection area for the residential tower would be contained within the interior loading area and would not be visible from the public street or off-site locations.

Table IV.A-2
Consistency of the Project with the Applicable Urban Design Policies
of the West Los Angeles Community Plan

Design Policies for Individual Projects	Analysis of Consistency
Parking Structures: Parking structures should be integrated with the design of the buildings they serve.	**Consistent:** The ancillary building containing the project's parking would provide continuity of architecture and landscaping treatments. The northern face of the lower ancillary building, 40-feet high facing the Santa Monica Boulevard frontage (20 feet with the Automated Parking Option), would be similar to that of the main residential tower by continuing the vertically integrated fritted glass and metal for continuity of design. The exposed north and east walls of the ancillary building (visible from Santa Monica Boulevard and Moreno Drive, respectively) would be treated with draped/vertical landscaping to soften the appearance of the building as viewed from these public areas, and blend with other project landscaping.
Community Design and Landscaping Guidelines	
Entryway Improvements: Provide improvements along principal streets and at major identified intersections and edges which clearly distinguish these as major entries to the community. Such improvements may include elements such as signage, landscaping, vertical pylons and/or distinctive treatments.	**Consistent.** The project site is located at the northeast corner of Century City. In this location, the proposed project would represent a gateway development, as approached from the west via Santa Monica Boulevard. The unique, 39-story landmark quality residential tower and landscaping along the street frontages would give distinction to the project site as a major Century City entry.
Street Trees: 1. Select species which (a) enhance the pedestrian character, and convey a distinctive high quality visual image for the streets, (b) are drought and smog tolerant and fire resistant, (c) complement the existing trees.	**Consistent:** All street trees would be subject to approval by the Street Tree Division of the Department of Public Works. Approval would take into consideration the enhancement of the pedestrian character of the sidewalks, drought and smog tolerance, and ability of new trees to complement existing trees along Century City's street frontages.
Street Furniture: Install street furniture that encourages pedestrian activity or physical and visual access to buildings and which is aesthetically pleasing, functional and comfortable, including such elements as bus and pedestrian benches, newspaper racks, bicycle racks, bus shelters, trash receptacles, kiosks, public telephones, landscaped planters, drinking fountains, and bollards. Priority should be given to pedestrian-oriented areas.	**Consistent:** The project would provide landscaping along the Santa Monica Boulevard and Moreno Drive street frontages. The treatments along the frontages would be consistent with and provide continuity with the adjacent walkways; and would provide an appropriate transition between the more active retail areas to the west and east of the project site.
Street Lighting: 1. Any new street lighting or pedestrian lighting system built in the public right-of-way must be designed to currently adopted City standards. Equipment must be tested and approved by the Bureau of Street Lighting.	**Consistent:** All pedestrian lighting in the public-right-of way would be approved by the City's Bureau of Street Lighting and would be required to meet adopted City standards. Equipment would be tested in accordance with the standard requirements of the Bureau of Street Lighting.
2. Establish a consistent street lighting type utilizing a light standard that is compatible with the overall street furniture.	**Consistent:** Any street lighting installed by the project in the public right-of-way would be compatible with the established design of street lighting along Century City's public streets and would be compatible with the overall design of existing and proposed street furniture.

Table IV.A-2 (Cont'd)

Consistency of the Project with the Applicable Urban Design Policies of the West Los Angeles Community Plan

Design Policies for Individual Projects	Analysis of Consistency
3. New lighting systems should be designed to minimize glare and light trespass.	**Consistent:** All pole-mounted light fixtures on the project's private property or within the public right-of-way would be shielded to limit spillover of lighting onto adjacent properties and to minimize glare.
Sidewalks/Paving: Repave existing sidewalks in pedestrian-oriented areas, with brick pavers, concrete, or other safe, non-slip materials to create a distinctive pedestrian environment.	**Consistent:** The project would improve adjacent sidewalks for safety and continuity of passage with adjacent sidewalks.

[a] *Chapter V, Urban Design, of the West Los Angeles Community Plan lists general design policies and objectives for individual projects, including Commercial (pages V-1 through V-3), Multiple Residential (pages V-3 through V-4) and Community Design and Landscaping (pages V-6 through V-10), but uses no numbered policy designations.*

Source: PCR Services Corporation, 2011

The proposed project would be consistent with the Community Plan's street tree policies, in that it would provide dense rows of street trees and on-site flowering and shade trees. The proposed project would be consistent with the Community Plan's street and pedestrian lighting policies in that any new street or pedestrian lighting system built in the public right-of-way would be approved by the City's Bureau of Street Lighting and would be required to be designed to currently adopted City standards. The proposed project would also be consistent with the Community Plan's public open space and plazas policies with regard to pedestrian accessibility and design, solar protection, and plant and hardscape materials. As the proposed project would be substantially consistent with the Community Plan's Urban Design policies, impacts with respect to the West Los Angeles Community Plan would be less than significant.

(iv) Century City North Specific Plan

The analysis of the project's relationship with applicable CCNSP design policies and guidelines is presented in **Table IV.A-3,** *Consistency of the Project with Applicable Visual Quality Policies of the Century City North Specific Plan*. As shown in Table IV.A-3, the proposed project would be substantially consistent with the visual quality requirements of the CCNSP. The project would screen mechanical appurtenances, etc. and provide continuity of design between the residential tower and the ancillary parking structure, which would be landscaped to blend with the project site. As described further in Section IV.H, Land Use, the project is in substantial compliance with other provisions of the CCNSP which are applicable to the proposed project.

Table IV.A-3

Consistency of the Project with Applicable Visual Quality Policies of the Century City North Specific Plan

Specific Plan Provision	Analysis of Project Consistency
Section 3.C.1.b: The 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 in the City of Los Angeles. 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. As noted above, this impact is conservatively identified as a significant shading impact. However this impact would occur mostly during the late afternoon to early evening in limited times of the year, in particular, the warmer parts of the year when late afternoon shading can provide relief from heat buildup. Further, as indicated in the analysis of shading impacts under the City's CEQA Thresholds Guide above, 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. The impact occurs on only one residential unit; and it does not occur at any single-family homes located in a single-family neighborhood or a single-family zoned area outside of the Specific Plan area in the City of Los Angeles. The impacted unit is an isolated non-consistent use within a multi-family residential zone, otherwise developed with multi-family housing. Therefore, the proposed project would be substantially consistent with this CCNSP provision.
Section 3.C.1.e: The project has been designed in a manner which adequately screens ventilation, heating and air conditioning ducts, tubes, equipment and other related appurtenances from the view of pedestrians, motorists and occupants of adjacent buildings.	**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 façade 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 ancillary building containing the project's parking would provide continuity of architecture and landscaping treatments. The northern face of the lower ancillary building, 40-feet high facing the Santa Monica Boulevard frontage, would be similar to that of the main residential tower by continuing the vertically integrated fritted glass and metal for continuity of design. The exposed north and east walls of the ancillary building (visible from Santa Monica Boulevard and Moreno Drive, respectively) would be treated with draped/vertical landscaping to soften the appearance of the building as viewed from these public areas, and blend with other project landscaping.

Source: PCR Services Corporation 2011

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 study area. Approximately 40 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 the 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 four 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 tower.
- 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 two new approximately 50-story towers containing 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: Office Project at 1950 Avenue of the Stars, City of Los Angeles – Development of 725,830 square feet of office space in a 37-story tower building and two low-rise one and two story office buildings
- Related Project No. 20: Mixed Use Development at 9900 Wilshire Boulevard, City of Beverly Hills – Development of 252 residential units, 15,646 square feet of retail uses, and 4,800 square feet of retail uses at the former Robinsons-May site.
- 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 the former Friars Club site at 9900 Santa Monica Boulevard, City of Beverly Hills - 119,000 square feet of office uses (unknown stories).

To some extent the development of new related projects may result in the removal or change in context of architecturally or historically important buildings, such as the addition of two towers to the Century Plaza Hotel site in Century City, or the possible removal or alteration of the Friars Club in the City of Beverly Hills. However, because the proposed project would not cause any historically or architecturally important structures to be altered or removed, it would not cumulatively contribute to aesthetic character impacts associated with the potential alteration or removal of valued aesthetic resources.

The City's cluster of high-rise buildings, including the downtown Los Angeles skyline, the Wilshire corridor skyline, and the Century City skyline are considered valued existing features or resources. The trend among new development in the vicinity of the proposed project, particularly within the City of Los Angeles, is to continue to add taller buildings to existing high-rise areas. Of the four nearby projects located in the City of Los Angeles, three include high-rise components, including the Westfield Century City New Century Plan Project (Related Project No. 14), a 39 story residential tower; 2025 Avenue of the Stars (Related Project No. 16) two new approximately 50-story towers; 1950 Avenue of the Stars (Related Project No. 18) one 37-story tower and low-rise office buildings. These projects would be located within Century City and within a similar field of view, as seen from the City's major street corridors and high areas such as the Hollywood Hills and Baldwin Hills.

It is anticipated that these related projects have been, or would be, constructed according to high-quality architectural design and would not individually or cumulatively cause the existing visual character of the area to be substantially altered or degraded. In addition, because the City's high-rise clusters are considered to add to the quality of skyline views, the tower elements introduced by the project and related projects would not substantially detract from the visual character of an area. Therefore, the cumulative impact of the related projects, combined with the proposed project, would be less than significant with respect to aesthetic character.

The high-rise elements in the related projects have the potential to block views from public streets and other vantage points, such as public parks, in and around the project vicinity. However, no scenic views through the Avenue of the Stars and Santa Monica Boulevard corridors, both locally designated scenic highways, would be blocked. Related Projects 20 and 22 were determined by the City of Beverly Hills to have visually significant impacts because of potential view blockage. However, no valued views of view resources are currently available across either of these sites. In addition, as viewed from public streets in the area, the projects within the City of Beverly Hills and Century City are in different viewsheds. Therefore, the proposed project would not cumulatively contribute to blockages of valued views or other changes in the viewshed caused by the Beverly Hills projects. As viewed from private locations (adjacent office buildings), the projects in the City of Beverly Hills combined with the proposed project and related projects in Century City are sufficiently distant from each other to not directly block views in a cumulative manner. Because the project and related projects would not cumulatively obstruct or alter an existing recognized valued views, impacts with respect to views would be less than significant.

It is anticipated that the related projects located near the project site in Century City and Beverly Hills would contribute to an increase in ambient light in the area. However, as new projects are substantively residential (a light sensitive use) in character, they would exhibit a similar pattern of lighting as existing residential uses. Therefore, cumulative light increases from residential uses interfacing with the area's residential neighborhoods would not alter the character of these light-sensitive uses. Some of the nearby related projects also would replace existing commercial uses and are not expected to significantly increase illuminated signage, vehicle traffic or light and glare associated with traffic headlights. Proposed high-rise buildings along east-bound Santa Monica Boulevard (Related Projects 2, 14, and 24) have the potential to increase glare from reflected sunlight during the afternoon hours. The project's potential glare impacts would be eliminated through the implementation of project design features and the recommended mitigation measure. Any cumulative increase in glare potential as a result of the proposed project would be less than significant.

The related projects' high-rise components would cast shadows on the surrounding area. The area that may experience shading from both the proposed project and related projects (including Related Projects No. 14, No. 20 and No. 22) include the Los Angeles Country Club Golf Course. Related Project No. 14 is located approximately two blocks to the west of the project site (more than 0.25 mile). Shading would occur to the west of shadows cast by the project and, when combined with the proposed project, would not cause any single area of the golf course, or green, to be shaded for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. from late October to early April or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. from early April to late October. Any future high-rise components associated with Related Projects No. 20 (the Robinson's May site) and No. 22 (the Beverly Hilton site) in the City of Beverly Hills have the potential to shade the golf course during early morning hours of the summer solstice and fall equinox (these projects are located to the east of the golf course and would cast westerly shadows during the summer and fall). However, because of the distance of these projects approximately 0.125 to 0.25 mile to the northeast of the project site, no single area of the golf course, or green, would be consecutively shaded by the related project and the proposed project for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. from late October to early April or more than four hours between the hours of 9:00 A.M. and 5:00 P.M. from early April to late October. Therefore, cumulative shade impacts would be less than significant.

5. MITIGATION MEASURES

With the implementation of the project's architectural and landscape design features, visual quality impacts would be less than significant. In addition, no significant impacts with respect to view obstruction are anticipated. With the implementation of the project's design features and existing LAMC signage and lighting regulations, no significant artificial light impacts have been identified. However, a potentially significant impact associated with reflected sunlight has been identified and addressed with a mitigation measure, below. In addition, mitigation measures are also recommended to ensure that specific design features would be implemented to reduce potential impacts to less than significant levels.

Mitigation Measure A-1: The Applicant shall provide a 12-foot construction fence for neighborhood protection during construction of the project, which is covered with an aesthetic treatment.

Mitigation Measure A-2: The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

Mitigation Measure A-3: The Applicant shall prepare a street tree plan to be reviewed and approved by the City's Department of Public Works, Street Tree Division. All plantings in the public right-of-way shall be installed in accordance with the approved street tree plan.

Mitigation Measure A-4: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the City of Los Angeles Department of Planning.

Mitigation Measure A-5: All new street and pedestrian lighting within the public right-of-way shall be approved by the Bureau of Street Lighting and shall be tested in accordance with the requirements of the Bureau of Street Lighting.

Mitigation Measure A-6: All new street and pedestrian lighting shall be shielded and directed away from any light-sensitive off-site uses.

Mitigation Measure A-7: Prior to the issuance of a building permit, architectural plans for all exterior lighting shall be submitted to the Department of Building and Safety for review to ensure that lighting has low reflectivity in accordance with Illuminating Engineers Society (IES) standards to minimize glare and limit light onto adjacent properties.

Mitigation Measure A-8: Prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façade and rooftop shall be submitted for review to the Department of Building and Safety to ensure that highly reflective materials are not utilized.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

No significant impacts with respect to aesthetic character and views would be anticipated. A potentially significant impact with respect to reflected sunlight or other glare from any building surface materials, including the architectural roof feature, was identified in the Light and Glare analysis. Although it is anticipated that non-reflective glass and other materials would be implemented, this issue would be addressed through Mitigation Measure A-8. With the implementation of this mitigation measures, potential glare impacts would be reduced to less than significant levels.

No significant shade impacts would occur pursuant to the City's significance thresholds for evaluating shading impacts on off-site uses. However, project shading would exceed a two-hour shading standard that is included in the CCNSP. This impact has been conservatively identified as a significant shading impact. The project would be substantially consistent with the plans and policies that are applicable to the project site; and impacts regarding policy and regulatory compliance would be less than significant.

IV. ENVIRONMENTAL IMPACT ANALYSIS
B. AIR QUALITY

1. INTRODUCTION

This section addresses potential effects on air quality associated with air emissions generated by the construction and operation of the proposed project. The analysis also addresses the consistency of the proposed project with the air quality policies set forth within the South Coast Air Quality Management District's (SCAQMD) Air Quality Management Plan, and the City of Los Angeles General Plan. The analysis of project-generated air emissions focuses on whether the proposed project would cause exceedance of an ambient air quality standard or SCAQMD significance threshold. Calculation worksheets, assumptions, and model outputs used in the analysis are contained in Appendix B of this Draft EIR.

2. ENVIRONMENTAL SETTING

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality.

The following pollutants are regulated by the EPA and therefore are subject to emission reduction measures adopted by federal, state and other regulatory agencies.

Ozone (O_3): Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds and nitrogen oxides (NOx) under favorable meteorological conditions such as high temperature and stagnation episodes. An elevated level of ozone irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower the lung efficiency.

Carbon Monoxide (CO): Carbon monoxide is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of carbon monoxide can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.

Particulate Matter (PM_{10} and $PM_{2.5}$): The human body naturally prevents the entry of larger particles into the body. However, small particles, with an aerodynamic diameter equal to or less than ten microns (PM_{10}) and even smaller particles with a aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can enter the body and are trapped in the nose, throat, and upper respiratory tract. These small particulates could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high

levels of particulate matter. Some types of particulates could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.

Nitrogen Oxides (NOx): Major sources of NOx include power plants, large industrial facilities, and motor vehicles. Nitrogen oxides are emitted from combustion processes and irritate the nose and throat. It increases susceptibility to respiratory infections, especially in people with asthma. The principal concern of NOx is as a precursor to the formation of ozone.

Sulfur Dioxide (SO_2): Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. Sulfur dioxide potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of sulfur dioxide, and long-term exposures to both pollutants leads to higher rates of respiratory illness.

Lead (Pb): Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

a. Regulatory Framework

A number of statutes, regulations, plans, and policies have been adopted that address air quality issues. The project site and vicinity are subject to air quality regulations developed and implemented at the federal, state, and local levels.

(1) Federal Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the United States Environmental Protection Agency (USEPA) is responsible for implementation of some portions of the CAA (e.g., certain mobile source and other requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies.

The CAA establishes federal air quality standards, known as National Ambient Air Quality Standards (NAAQS) and specifies future dates for achieving compliance. The CAA also mandates that the state submit and implement a State Implementation Plan (SIP) for areas not meeting these standards. These plans must include pollution control measures that demonstrate how the standards will be met. The project site is within the South Coast Air Basin (Basin), which is an area designated as non-attainment as the area does not meet NAAQS for certain pollutants regulated under the CAA.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of

the CAA which are most applicable to the proposed project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions).

Title I requirements are implemented for the purpose of attaining NAAQS for the following criteria pollutants: (1) ozone (O_3); (2) nitrogen dioxide (NO_2); (3) sulfur dioxide (SO_2); (4) particulate patter (PM_{10}); (5) carbon monoxide (CO); and (6) lead (Pb). **Table IV.B-1**, *Ambient Air Quality Standards*, shows the NAAQS currently in effect for each criteria pollutant. The NAAQS were amended in September 2006 to include an established methodology for calculating $PM_{2.5}$ as well as revoking the annual PM_{10} threshold. The NAAQS were amended in July 1997 to include an 8-hour standard for O_3 and to adopt a NAAQS for $PM_{2.5}$. The CAA sets certain deadlines for meeting the NAAQS within the Basin including the following: (1) 1-hour O_3 by the year 2010; (2) 8-hour O_3 by the year 2024; (3) PM_{10} by the year 2006; and (4) $PM_{2.5}$ by the year 2015. Nonattainment designations are categorized into seven levels of severity: (1) basic, (2) marginal, (3) moderate, (4) serious, (5) severe-15, (6) severe-17, and (7) extreme.[1] On June 11, 2007, the USEPA reclassified the Basin as a federal "attainment" area for CO and approved the Basin's CO maintenance plan.[2] It should be noted that the Basin met the PM_{10} standards in 2006 at all stations except for western Riverside.[3] The Basin fails to meet national standards for O_3, PM_{10}, and $PM_{2.5}$ and therefore is considered a Federal "non-attainment" area for these pollutants. **Table IV.B-2**, *South Coast Air Basin Attainment Status*, lists the criteria pollutants and their relative attainment status.

Title II of the CAA pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline, automobile pollution control devices, and vapor recovery nozzles on gas pumps are a few of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have lowered substantially and the specification requirements for cleaner burning gasoline are more stringent.

(2) California Clean Air Act

The California Clean Air Act (CCAA), signed into law in 1988, requires all areas of the State to achieve and maintain the California Ambient Air Quality Standards (CAAQS) by the earliest practical date. Table IV.B-1 shows the CAAQS currently in effect for each of the criteria pollutants as well as the other pollutants recognized by the State. As shown in Table IV.B-1, the CAAQS include more stringent standards than the NAAQS for most of the criteria air pollutants. In general, the California standards are more health protective than the corresponding NAAQS. In addition, the California Air Resources Board (CARB) has established standards for other pollutants recognized by the State, such as sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

Table IV.B-2 provides a summary of the Basin's attainment status with respect to state standards. The Basin is designated as attainment for the California standards for sulfates, and unclassified for hydrogen sulfide and visibility-reducing particles. Because vinyl chloride is a carcinogenic toxic air contaminant, the CARB does not classify attainment status for this pollutant.

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1 *The "-15" and "-17" designations reflect the number of years within which attainment must be achieved.*

2 *"Approval and Promulgation of Implementation Plans and Designation of Areas for Air Quality Planning Purposes: California, Final Rule." Federal Register 72 (11 May 2007):26718-26721*

3 *South Coast Air Quality Management District, Draft 2007 AQMP.*

Table IV.B-1

Ambient Air Quality Standards [a]

Pollutant	Averaging Time	California Standards [1]		Federal Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Ozone ($O^{3)}$	1 Hour	0.09 ppm (180 µg/m³)	Ultraviolet Photometry	—	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.070 ppm (137 µg/m³)		0.08 ppm (147 µg/m³)		
Respirable Particulate Matter (PM_{10})	24 Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		—		
Fine Particulate Matter ($PM_{2.5}$)	24 Hour	No Separate State Standard		35[j] µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	15 µg/m³		
Carbon Monoxide (CO)	8 Hour	9.0 ppm (10mg/m³)	Non-Dispersive Infrared Photometry (NDIR)	9 ppm (10 mg/m³)	None	Non-Dispersive Infrared Photometry (NDIR)
	1 Hour	20 ppm (23 mg/m³)		35 ppm (40 mg/m³)		
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)		—	—	—
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (56 µg/m³)	Gas Phase Chem-iluminescence	53 ppb (100 µg/m³)	Same as Primary Standard	Gas Phase Chemiluminescenc e
	1 Hour	0.18 ppm (338 µg/m³)		100 ppb (188 µg/m³)	None	
Sulfur Dioxide (SO_2)	24 Hour	0.04 ppm (105 µg/m³)	Ultraviolet Fluorescence	—	—	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)[9] —
	3 Hour	—		—	0.5 ppm (1300 µg/m³)	
	1 Hour	0.25 ppm (655 µg/m³)		75 ppb (196 µg/m³)	—	
Lead[10]	30 Day Average	1.5 µg/m³	Atomic Absorption	—	—	—
	Calendar Quarter	—		1.5 µg/m³	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Rolling 3-Month Average[11]	--		0.15 µg/m³		
Visibility Reducing Particles	8 Hour	Extinction coefficient of 0.23 per kilometer — visibility of ten miles or more (0.07 — 30 miles or more for Lake Tahoe) due to particles when relative humidity is less than 70 percent. Method: Beta Attenuation and Transmittance through Filter Tape.		**No Federal Standards**		
Sulfates (SO_4)	24 Hour	25 µg/m³	Ion Chromatography			

Table IV.B-1 (Continued)

Ambient Air Quality Standards [a]

Pollutant	Averaging Time	California Standards [1]		Federal Standards [2]		
		Concentration [3]	Method [4]	Primary [3,5]	Secondary [3,6]	Method [7]
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m^3)	Ultraviolet Fluorescence			
Vinyl Chloride[10]	24 Hour	0.01 ppm (26 µg/m^3)	Gas Chromatography			

1 *California standards for ozone, carbon monoxide (except Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, suspended particulate matter (PM_{10} and $PM_{2.5}$) and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.*

2 *National standards (other than ozone, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest eight hour concentration in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24 hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24 hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact U.S. EPA for further clarification and current federal policies.*

3 *Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.*

4 *Any equivalent procedure which can be shown to the satisfaction of the CARB to give equivalent results at or near the level of the air quality standard may be used.*

5 *National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.*

6 *National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.*

7 *Reference method as described by the EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the EPA.*

8 *To attain this standard, the 3-year average of the 98th percentile of the daily maximum 1-hour average at each monitor within an area must not exceed 0.100 ppm (effective January 22, 2010). Note that the (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standards of 53 ppb and 100 ppb are identical to 0.053 ppm and 0.100 ppm, respectively.*

9 *On June 2, 2010, the US EPA established a new 1-hour SO_2 standard, effective August 23, 2010, which is based on the 3-year average of the annual 99th percentile of 1-hour daily maximum of 0.14 ppm and the annual primary SO_2 standard of 0.030 ppm, effective August 23, 2010.*
The secondary SO_2 standard was not revised at that time; however, the secondary standard is undergoing a separate review by EPA standards are in units of parts per million (ppm). To directly compare the new primary national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

10 *The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.*

11 *National lead standard, rolling 3-month average: final rule signed October 15, 2008.*

Source: California Air Resources Board (09/08/2010).

(3) California Air Resources Board Air Quality and Land Use Handbook

The CARB published a draft version of the *Air Quality and Land Use Handbook* on February 17, 2005, to serve as a general guide for considering impacts to sensitive receptors from facilities that emit toxic air contaminant (TAC) emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of the CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles

Table IV.B-2

South Coast Air Basin Attainment Status

Pollutant	National Standards	California Standards
Ozone (1-hour standard)	N/A [a]	Non-attainment
Ozone (8-hour standard)	Extreme	N/A
Carbon Monoxide	Attainment	Attainment [b]
Nitrogen Dioxide	Attainment [b]	Attainment [b]
Sulfur Dioxide	Attainment [b]	Attainment [b]
PM_{10} (24-hour standard)	Serious	Non-attainment
PM_{10} (annual standard)	N/A [c]	Non-attainment
$PM_{2.5}$	Serious	Non-attainment
Lead	Attainment [b]	Attainment [b]
Visibility Reducing Particles	N/A	Unclassified
Sulfates	N/A	Attainment [b]
Hydrogen Sulfide	N/A	Unclassified
Vinyl Chloride	N/A	N/A [d]

N/A = not applicable

[a] *The NAAQS for 1-hour ozone was revoked on June 15, 2005 for all areas except Early Action Compact areas.*
[b] *An air basin is designated as being in attainment for a pollutant if the standard for that pollutant was not violated at any site in that air basin during a three year period.*
[c] *The NAAQS for annual PM_{10} was revoked on September 21, 2006.*
[d] *In 1990 the CARB identified vinyl chloride as a toxic air contaminant and determined that it does not have an identifiable threshold. Therefore, the CARB does not monitor or make status designations for this pollutant.*

Source: USEPA Region 9 (September 2010) and California Air Resources Board (March 25, 2010).

per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

(4) California Air Resources Board Airborne Toxic Control Measures

In 2004, the CARB adopted an Airborne Toxic Control Measure (ATCM) to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at any given time.

In addition to limiting exhaust from idling trucks, the CARB recently promulgated emission standards for off-road diesel construction equipment such as bulldozers, loaders, backhoes and forklifts, as well as many other self-propelled off-road diesel vehicles. The regulation adopted by the California Air Resources Board on July 26, 2007 aims to reduce emissions by installation of diesel soot filters and encouraging the replacement of older, dirtier engines with newer emission controlled models. Implementation is staggered based on fleet size, with the largest operators to begin compliance in 2010. By 2020, the CARB estimates

that diesel particulate matter will be reduced by 74 percent and smog forming oxides of nitrogen by 32 percent, compared to what emissions would be without the regulation.

(5) South Coast Air Quality Management District

The SCAQMD has jurisdiction over an area of approximately 10,743 square miles. This area includes all of Orange County, Los Angeles County except for the Antelope Valley, the nondesert portion of western San Bernardino County, and the western and Coachella Valley portions of Riverside County. The Basin is a subregion of the SCAQMD jurisdiction. While air quality in this area has improved, the Basin requires continued diligence to meet air quality standards.

In order to meet the CAAQS and NAAQS, the SCAQMD has adopted a series of Air Quality Management Plans (AQMP). The 2007 AQMP employs the most up-to-date science, primarily in the form of updated emissions inventories, ambient measurements, new meteorological episodes and new air quality modeling tools. Policies and measures to achieve federal standards for healthful air quality in the Basin are built upon in the 2007 AQMP Plan. It also incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on-road and off-road mobile sources and area sources.

The 2007 AQMP builds upon improvements accomplished in previous plans and aims to incorporate all feasible control measures while balancing costs and socioeconomic impacts for the attainment of air quality standards. However, it highlights the significant amount of reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under federal Clean Air Act.

The 2007 AQMP relies on a comprehensive and integrated control approach aimed at achieving the $PM_{2.5}$ standard by 2015 through implementation of short- and mid-term control measures and achieving the 8-hour ozone standard by 2024 based on implementation of additional long-term measures. These reductions are expected to be achieved through implementation of new and advanced control technologies as well as improvement of existing control technologies. Control techniques requiring substantial levels of committed funding for implementation would also fall under this category of long-term emission reductions.

There are four components of the 2007 AQMP control measures: 1) the District's Stationary and Mobile Source Control Measures; 2) CARB's Proposed State Strategy; 3) District Staff's Proposed Policy Options to Supplement the CARB's Control Strategy; and 4) Regional Transportation Strategy and Control Measures provided by the Southern California Association of Governments (SCAG). Overall, the Plan includes 31 stationary and 30 mobile source measures. The District's control strategy for stationary and mobile sources is based on the following approaches: 1) facility modernization; 2) energy efficiency and conservation; 3) good management practices; 4) market incentives/compliance flexibility; 5) area source programs; 6) emission growth management; and 7) mobile source programs.

The SCAQMD adopts rules and regulations to implement portions of the AQMP. Several of these rules may apply to construction or operation of the project. For example, SCAQMD Rule 403 requires the implementation of best available fugitive dust control measures during active construction periods capable of generating fugitive dust emissions from on-site earth-moving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. The full text of SCAQMD Rule 403 is included in Appendix B.1 of this Draft EIR.

The *CEQA Air Quality Handbook* (the Handbook) was published in November 1993 to provide local governments with guidance for analyzing and mitigating project-specific air quality impacts. The Handbook provides standards, methodologies, and procedures for conducting air quality analyses in EIRs and was used extensively in the preparation of this analysis. However, the SCAQMD is currently in the process of replacing the Handbook with the *Air Quality Analysis Guidance Handbook*. While this process is underway, the SCAQMD recommends that the lead agency avoid using the screening tables in the Handbook's Chapter 6, because the tables were derived using an obsolete version of the CARB's mobile source emission factor inventory, and the trip generation characteristic of the land uses identified in these screening tables were based on the fifth edition of the ITE Trip Generation Manual, instead of the most current sixth edition. Additionally, the lead agency should avoid using the on-road mobile source emission factors in Table A9-5-J1 through A9-5-L. The SCAQMD instead recommends using other approved models to calculate emissions from land use projects, such as the CalEEMod modeling software, released February 2011.[4]

In addition, the SCAQMD has published a guidance document called the Localized Significance Threshold Methodology for CEQA Evaluations (June 2003) that is intended to provide guidance in evaluating localized effects from mass emissions during construction. Recently, the SCAQMD adopted additional guidance regarding $PM_{2.5}$ in a document called Final-methodology to Calculate Particulate Matter $(PM)_{2.5}$ and $PM_{2.5}$ Significance Thresholds (October 2006). These documents were also used in the preparation of this analysis.

The SCAQMD has also adopted land use planning guidelines in the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning (May 2005), which considers impacts to sensitive receptors from facilities that emit TAC emissions. SCAQMD's distance recommendations are the same as those provided by the CARB (e.g., a 500-foot siting distance for sensitive land uses proposed in proximity of freeways and high-traffic roads, and the same siting criteria for distribution centers and dry cleaning facilities). The SCAQMD's document introduces land use related policies that rely on design and distance parameters to minimize emissions and lower potential health risk. SCAQMD's guidelines are voluntary initiatives recommended for consideration by local planning agencies.

(6) Regional Comprehensive Plan and Guide

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG is the federally designated metropolitan planning organization (MPO) for the majority of the southern California region and is the largest MPO in the nation. As the designated MPO, SCAG is mandated by the federal government to develop and implement regional plans that address transportation, growth management, hazardous waste management and air quality issues. With respect to air quality planning, SCAG prepared and, in 1994, adopted, the Regional Comprehensive Plan and Guide (RCPG), which includes Growth Management[5] and Regional Mobility[6] chapters that provide control measures and a basis for emission projections, air quality forecasts and other analyses contained in the SCAQMD's AQMP.

[4] *http://www.aqmd.gov/ceqa/oldhdbk.html.*

[5] *http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGGrowthManagementChapter.pdf.*

[6] *http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGRegionalMobilityChapter.pdf.*

In 2008, SCAG released the Regional Comprehensive Plan (RCP) which addresses regional issues such as housing, traffic/transportation, water, and air quality. The RCP serves as an advisory document to local agencies in the southern California region for their information and voluntary use for preparing local plans and handling local issues of regional significance. The RCP presents a vision of how southern California can balance air quality by including goals such as: reducing emissions of criteria pollutants to attain federal air quality standards by prescribed dates and stat ambient air quality standards as soon as practicable; reverse current trends in greenhouse gas emissions to support sustainability goals for energy, water supply, agriculture, and other resource areas; and to minimize land uses that increase the risk of adverse air pollution-related health impacts from exposure to toxic air contaminants, particulates (PM_{10} and $PM_{2.5}$) and carbon monoxide.

(7) City of Los Angeles Policies

The City of Los Angeles General Plan was prepared in response to California state law requiring that each city and county adopt a long-term comprehensive general plan. This plan must be integrated, internally consistent, and present goals, objectives, policies, and implementation guidelines for decision makers to use. The City has included an Air Quality Element as part of its General Plan. The planning area for the City's Air Quality Element covers the entire City of Los Angeles, which encompasses an area of about 465 square miles.

The 1992 revision of the City's General Plan Air Quality Element serves to aid the greater Los Angeles region in attaining the state and federal ambient air quality standards at the earliest feasible date, while still maintaining economic growth and improving the quality of life. The City's Air Quality Element and the accompanying Clean Air Program acknowledge the inter-relationships between transportation and land use planning in meeting the City's mobility and clean air goals. With the City's adoption of the Air Quality Element and the accompanying Clean Air Program, the City is seeking to achieve consistency with regional Air Quality, Growth Management, Mobility, and Congestion Management Plans.

To achieve these goals, performance based standards have been adopted to provide flexibility in implementation of the policies and objectives, of the City's Air Quality Element. City Air Quality Element goals, objectives and policies that are relevant to the proposed project are discussed below.

b. Existing Conditions

(1) Regional Context

The proposed project is located within the South Coast Air Basin (Basin), an approximately 6,745-square-mile area bounded by the Pacific Ocean to the west and the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties, in addition to the San Gorgonio Pass area in Riverside County. The terrain and geographical location determine the distinctive climate of the Basin, as the Basin is a coastal plain with connecting broad valleys and low hills.

The southern California region lies in the semi-permanent high-pressure zone of the eastern Pacific. As a result, the climate is mild, tempered by cool sea breezes. The usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The extent and severity of the air pollution problem in the Basin is a function of the area's natural physical characteristics (weather and topography), as well as man-made influences (development patterns and

lifestyle). Factors such as wind, sunlight, temperature, humidity, rainfall, and topography all affect the accumulation and dispersion of pollutants throughout the Basin, making it an area of high pollution potential.

The greatest air pollution impacts throughout the Basin occur from June through September. This condition is generally attributed to the large amount of pollutant emissions, light winds, and shallow vertical atmospheric mixing. This frequently reduces pollutant dispersion, thus causing elevated air pollution levels. Pollutant concentrations in the Basin vary with location, season, and time of day. Ozone concentrations, for example, tend to be lower along the coast, higher in the near inland valleys, and lower in the far inland areas of the Basin and adjacent desert. Over the past 30 years, substantial progress has been made in reducing air pollution levels in southern California.

The SCAQMD has released a draft final Basin-wide air toxics study (MATES III, Multiple Air Toxics Exposure Study, May 2008). The MATES III Study represents one of the most comprehensive air toxics studies ever conducted in an urban environment. The Study was aimed at estimating the cancer risk from toxic air emissions throughout the Basin by conducting a comprehensive monitoring program, an updated emissions inventory of toxic air contaminants, and a modeling effort to fully characterize health risks for those living in the Basin. The Study concluded that the average carcinogenic risk from air pollution in the Basin is approximately 1,200 in one million. Mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors. Approximately 85 percent of the risk is attributed to diesel particulate emissions, approximately 10 percent to other toxics associated with mobile sources (including benzene, butadiene, and formaldehyde), and approximately 5 percent of all carcinogenic risk is attributed to stationary sources (which include industries and other certain businesses, such as dry cleaners and chrome plating operations).

As part of the MATES III study, the SCAQMD has prepared a series of maps that show regional trends in estimated outdoor inhalation cancer risk from toxic emissions, as part of an ongoing effort to provide insight into relative risks. The maps' estimates represent the number of potential cancers per million people associated with a lifetime of breathing air toxics (24 hours per day outdoors for 70 years) in parts of the area. According to the SCAQMD maps, the estimated cancer risk for the vicinity of the proposed project is estimated at 950 cancers per million, while the vast majority of the area ranges between 500 to 1,200 cancers per million.[7] Generally, the risk from air toxics is lower near the coastline: it increases inland, with higher risks concentrated near large diesel sources (e.g., freeways, airports, and ports).

The CARB also prepares a series of maps that show regional trends in estimated outdoor inhalable cancer risk from air toxic emissions. The Year 2001 Central Los Angeles County map, which is the most recently available map to represent existing conditions, shows cancer risk ranging from 100 to 1,500 cancers per million, which is generally consistent with the SCAQMD's risk maps.[8]

The data from the SCAQMD and the CARB provide a slightly different range of risk. This difference is primarily related to the fact that the SCAQMD risk is based on monitored pollutant concentrations and the CARB risk is based on dispersion modeling and emission inventories. Regardless, the SCAQMD and the CARB data shows that there is an inherent health risk associated with living in urbanized areas of the Basin, where

[7] *http://www2.aqmd.gov/webappl/matesiii.*

[8] *http://www.arb.ca.gov/toxics/cti/hlthrisk/cncrinhl/riskmapviewfull.htm.*

mobile sources (e.g., cars, trucks, trains, ships, aircraft, etc.) represent the greatest contributors to the overall risk.

(2) Local Area Conditions

(a) Existing Pollutant Levels at Nearby Monitoring Stations

The SCAQMD maintains a network of air quality monitoring stations located throughout the South Coast Air Basin and has divided the Basin into air monitoring areas. The monitoring station most representative of the project site is the West Los Angeles/Veterans Administration Hospital Monitoring Station (Northwest Coastal LA County). Criteria pollutants monitored at this station include O_3, CO, and NO_2. The most representative monitoring station for PM_{10} and SO_2 is the Hawthorne Monitoring Station (Southwest Coastal LA County) and for $PM_{2.5}$ is the Long Beach Monitoring Station (South Coastal LA County). The most recent data available from these monitoring stations encompass the years 2005 to 2009.[9] The data, shown in **Table IV**.B-3**,** *Pollutant Standards and Ambient Air Quality Data*, show the following pollutant trends:

Ozone (O_3). During the 2005 to 2009 reporting period, the maximum 1-hour ozone concentration was recorded in 2009 at 0.131 ppm. During this period, the California standard of 0.09 ppm was exceeded eight times annually, with the highest number of exceedances in 2006. The National standard of 0.12 ppm was not exceeded during the reporting period. The maximum eight-hour ozone concentration recorded during the reporting period was 0.97 ppm, reported in 2008. During the reporting period, the National 8-hour average standard of 0.08 ppm was exceeded three times in 2009.

Particulate Matter (PM_{10}). The highest recorded concentration during the period of 2005 to 2009 was 96 micrograms per cubic meter ($\mu g/m^3$), which was recorded in 2007. During this same time period, the California PM_{10} standard was exceeded between one and two times annually, with the highest number of exceedances in 2007. The national PM_{10} standard was not exceeded during this period. PM_{10} is monitored every six days coincident to a national schedule; thus, PM_{10} exceedances are based on the number of days that sampling occurred. The maximum recorded arithmetic mean concentration of 27.7 $\mu g/m^3$ was recorded in 2007.

Particulate Matter ($PM_{2.5}$). Maximum $PM_{2.5}$ concentrations varied between 53.9 and 82.9 between 2005 and 2009. During these years the National standard was exceeded between zero and twelve times per year with the maximum number of exceedances occurring in 2007. The highest number of exceedances were recorded in 2007. In 2006, the USEPA lowered the standard to 35 $\mu g/m^3$. This resulted in five and twelve exceedances recorded in 2006 and 2007 respectively. The highest annual arithmetic mean was 16 $\mu g/m^3$, recorded in 2005.

Carbon Monoxide (CO). The highest 1-hour CO concentration was 4 ppm, reported in 2008 and the highest 8-hour CO concentration was 2.5 ppm, also reported in 2008. Neither the California nor the National CO standards were exceeded during the 2005 to 2009 reporting period.

[9] *http://www.aqmd.gov/smog/historicaldata.htm*

Table IV.B-3

Pollutant Standards and Ambient Air Quality Data[a]

Pollutant/Standard	2005	2006	2007	2008	2009
Ozone					
O_3 (1-hour)					
Maximum Concentration (ppm)	0.086	0.110	0.087	0.110	0.131
Days > CAAQS (0.09 ppm)	0	8	0	3	6
Days > NAAQS (0.12 ppm)	0	0	0	0	0
O_3 (8-hour)					
Maximum Concentration (ppm)	0.076	0.008	0.074	0.097	0.094
4th High 8-hour Concentration (ppm)	0.068	0.062	0.066	0.073	0.075
Days > CAAQS (0.07 ppm)	1	0	1	8	5
Days > NAAQS (0.08 ppm)	0	0	0	1	3
Particulate Matter (PM_{10})					
PM_{10} (24-hour)					
Maximum Concentration ($\mu g/m^3$)	44	45	96	50	52
Days > CAAQS (50 $\mu g/m^3$)	0	0	2(4)	0(0%)	1(1.7)
Days > NAAQS (150 $\mu g/m^3$)	0	0	0	0	0
PM_{10} (Annual Average)					
Annual Arithmetic Mean (50 $\mu g/m^3$)	22.9	26.5	27.7	25.6	25.4
Particulate Matter ($PM_{2.5}$)					
$PM_{2.5}$ (24-hour)					
Maximum Concentration ($\mu g/m^3$)	53.9	58.5	82.9	57.2	63.4
Days > NAAQS (65 $\mu g/m^3$)	0	0	1(0.3)	0	0
Days > NAAQS (35 $\mu g/m^3$)	N/A[a]	5(1.7)	12(3.6)	8(2.3)	6(1.6)
$PM_{2.5}$ (Annual)					
Annual Arithmetic Mean (15 $\mu g/m^3$)	16.0	14.2	14.6	14.2	13.0
Carbon Monoxide					
CO (1-hour)					
Maximum Concentration (ppm)	3	3	3	4	2
Days > CAAQS (20 ppm)	0	0	0	0	0
Days > NAAQS (35 ppm)	0	0	0	0	0
CO (8-hour)					
Maximum Concentration (ppm)	2.1	2.3	2.4	2.5	1.9
Days > CAAQS (9 ppm)	0	0	0	0	0
Days > NAAQS (9 ppm)	0	0	0	0	0
Nitrogen Dioxide					
NO_2 (1-hour)					
Maximum Concentration (ppm)	0.09	0.10	0.08	0.09	0.08
Days > CAAQS (0.25 ppm)	0	0	0	0	0
NO_2 (Annual)					
Annual Arithmetic Mean (0.053 ppm)	0.0134	0.0155	0.0140	0.0143	0.0159

Table IV.B-3 (Continued)

Pollutant Standards and Ambient Air Quality Data[a]

Pollutant/Standard	2005	2006	2007	2008	2009
Sulfur Dioxide					
SO_2 (1-hour)					
Maximum Concentration (ppm)	0.04	0.02	0.02	0.02	0.02
Days > CAAQS (0.25 ppm)	0	0	0	0	0
SO_2 (24-hour)					
Maximum Concentration (ppm)	0.012	0.006	0.009	0.005	0.006
Days > CAAQS (0.04 ppm)	0	0	0	0	0
Days > **N**AAQS (0.14 ppm)	0	0	0	0	0
SO_2 (Annual)					
Annual Arithmetic Mean (0.03 ppm)	N/A	0.0020	0.0028	0.0014	0.0003
Lead					
Maximum 30-day average ($\mu g/m^3$)	--	0.01	0.02	0.01	0.00
Maximum calendar quarter ($\mu g/m^3$)	--	0.01	0.01	0.01	0.00

ppm = parts per million; $\mu g/m^3$= micrograms per cubic meter; AAM Annual Arithmetic Mean; n/a = not applicable; -- = Data not available

[a] *In September 2006, the 24-hr $PM_{2.5}$ standard was changed from 65 $\mu g/m^3$ to 35 $\mu g/m^3$. The data representing days above standard for 2002-2005 apply to the old standard. The data representing days above standard for 2006 apply to the new standard.*

[b] *Ambient data for airborne lead are not included in this table since the Basin is currently in compliance with State and National standards for lead.*

Source: California Air Resources Board, Ambient Air Data Summaries, 2004-2008.

Nitrogen Dioxide (NO_2). The highest 1-hour concentration of NO_2 was recorded in 2006 and was 0.10 ppm. The highest annual arithmetic mean was 0.159 ppm, recorded in reporting year 2009. Neither the California nor the National NO_2 standards were exceeded during the reporting period.

Sulfur Dioxide (SO_2). The highest 1-hour concentration of SO_2 was 0.04 ppm, recorded in 2005. The highest 24-hour concentrations was 0.012 ppm recorded in 2005. No exceedances of the California or National SO_2 standards were recorded during this reporting period. The highest annual arithmetic mean was 0.0028 ppm recorded in 2007.

Lead (Pb). The highest 30-day average concentration of lead was 0.02 $\mu g/m^3$ recorded in 2007, below the California 1.5 $\mu g/m^3$ standard. The highest calendar quarter concentration was 0.01, in 2006 through 2008, below the National 1.5 $\mu g/m^3$ standard. The data demonstrates that the area is currently in compliance with California and National standards for Pb, as no exceedances were recorded.

Sulfates. The maximum 24-hour concentration of sulfates was 14.3 $\mu g/m^3$ recorded in 2003, below the 25 $\mu g/m^3$ State standard. These data confirm that the Basin is currently designated as attainment with respect to the State standard for sulfates.

Visibility Reducing Particles. The Basin is currently designated as "unclassified" with respect to the State standard for visibility reducing particles. Continuous monitoring is not currently performed within the Basin for this standard.

Hydrogen Sulfide. The Basin is currently designated as "unclassified" with respect to the State standard for hydrogen sulfide. The CARB does not perform or require ambient monitoring of this pollutant.

Vinyl Chloride. The Basin is currently designated as "unclassified" with respect to the State standard for vinyl chloride. In 1990, the CARB identified vinyl chloride as a toxic air contaminant and determined that it does not have an identifiable threshold. Therefore, the CARB does not perform or require ambient monitoring for this pollutant.

(b) Existing Health Risk in the Surrounding Area

As indicated above, the project site is located within a cancer risk zone of 500 to 1,200 in one million. However, the visual resolution available in the map is 1 kilometer by 1 kilometer and, thus, impacts from individual facilities for individual neighborhoods are not discernable on this map. In general, the risk of the project site is comparable with other areas in the Los Angeles area.

(c) Sensitive Receptors and Locations

Some population groups, including children, elderly, and acutely and chronically ill persons (especially those with cardio-respiratory diseases), are considered more sensitive to air pollution than others. Sensitive land uses in close proximity to the project site are shown in **Figure IV.B-1**, *Closest Sensitive Receptor Locations*, and include the following:

- Residential units east of the project site. Multi-family residences along Durant Drive and Robbins Drive, approximately 65 feet east of the project site, on the east side of Moreno Drive.
- Beverly Hills High School. High School located along the west side of Moreno Drive adjacent to the southern edge of the project site.

3. PROJECT IMPACTS

a. Significance Thresholds

Appendix G of the State CEQA Guidelines provides sample checklist questions for use in an Initial Study to determine a project's potential for environmental impacts. According to the questions contained in Appendix G under Section III, Air Quality, a project would have a significant impact if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);

PCR

N

0 400 Feet

Closest Sensitive Receptor Locations

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2008; Google Earth, 2008.

FIGURE

IV.B-1

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- Expose sensitive receptors to substantial pollutant concentrations; or
- Create objectionable odors affecting a substantial number of people.

The City of Los Angeles has not adopted specific Citywide significance thresholds for air quality impacts; instead, the *City of L.A. CEQA Thresholds Guide (2006)* references thresholds and methodologies contained in the SCAQMD CEQA Air Quality Handbook. Methodologies are elaborated up in the Air Quality Analysis Guidance Handbook, and subsequent guidance, discussed below.[10] [11]

(1) Construction Emissions

The following factors are set forth in the *City of L.A. CEQA Thresholds Guide (2006)*, for consideration on a case-by-case basis for evaluation of significance:

Combustion Emissions from Construction Equipment

- Type, number of pieces, and usage for each type of construction equipment;
- Estimated fuel usage and type of fuel (diesel, natural gas) for each type of equipment; and
- Emission factors for each type of equipment.

Fugitive Dust

Grading, Excavation and Hauling:

- Amount of soil to be disturbed on-site or moved off-site;
- Emission factors for disturbed soil;
- Duration of grading, excavation, and hauling activities;
- Type and number of pieces of equipment to be used; and
- Projected haul route.

Heavy-Duty Equipment Travel on Unpaved Road:

- Length and type of road;
- Type, number of pieces, weight, and usage of equipment; and
- Type of soil.

Other Mobile Source Emissions

- Number and average length of construction worker trips to project site, per day; and
- Duration of construction activities.

[10] *The SCAQMD is in the process of developing an Air Quality Analysis Guidance Handbook to replace the CEQA Air Quality Handbook. In the interim, supplemental guidance has been adopted by the SCAQMD.*

[11] *While the SCAQMD CEQA Air Quality Handbook contains significance thresholds for lead, construction, and operation of the proposed Project is not anticipated to exceed the established thresholds for lead. Furthermore, the Los Angeles region is well below the state and federal ambient air quality standards for lead. Therefore, lead emissions associated with the proposed Project will not cause an air quality violation and are not analyzed further.*

While these factors are important inputs in determining the amounts and nature of air pollution emissions generated by a project during construction, they do not constitute a threshold to which the resultant emissions may be compared for purposes of determining significance. Based on criteria set forth in the SCAQMD Handbook, the project would have a significant impact with regard to construction emissions if the following would occur:

AIR-1 Regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 100 pounds per day for NO_X, (2) 75 pounds a day for VOC, (3) 150 pounds per day for PM_{10}, (4) 55 pounds per day $PM_{2.5}$ (5) 550 pounds per day for CO, and (6) 150 pounds per day for SO_X.[12]

In addition, the SCAQMD has developed methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards. Impacts would be considered significant if the following would occur:

AIR-2 Maximum daily localized emissions are greater than the applicable Localized Significance Thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the project site greater than the most stringent ambient air quality standards for CO and NO^2.[13]

AIR-3 Maximum localized PM_{10} or $PM_{2.5}$ emissions during construction are greater than the applicable LSTs, resulting in predicted ambient concentrations in the vicinity of the site to exceed 50 μg/m^3 over five hours (SCAQMD Rule 403 control requirement).

(2) Operational Emissions

Thresholds of significance regarding operational emissions are set forth in the *City of L.A. CEQA Thresholds Guide (2006),* which states that a project would normally have a significant impact on air quality from project operations if any of the following would occur:

AIR-4 Operational emissions exceed 10 tons per year of volatile organic gases or any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOC, (2) 55 pounds per day for NO_X, (3) 550 pounds per day for CO, (4) 150 pounds per day for PM_{10} or SO_X[14] and (5) 55 pounds per day for $PM_{2.5}$.[15]

In addition, the SCAQMD has developed methodology to assess the potential for localized emissions to cause an exceedance of applicable ambient air quality standards. Impacts would be considered significant if the following would occur:

AIR-5 Maximum daily localized emissions are greater than the applicable Localized Significance Thresholds (LST), resulting in predicted ambient concentrations in the vicinity of the project

[12] *http://www.aqmd.gov/ceqa/handbook/signthres.doc.*

[13] *South Coast Air Quality Management, LST Methodology: http://www.aqmd.gov/ceqa/handbook/lst/Method_final.pdf.*

[14] *South Coast Air Quality Management District, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project), 1993.*

[15] *South Coast Air Quality Management District, Final-Methodology to Calculate Particulate Matter (PM) 2.5 and $PM_{2.5}$ Significance Thresholds, October 2006.*

site greater than the most stringent ambient air quality standards for CO, NO2, PM_{10} and $PM_{2.5}$.[16]

AIR-6 Either of the following conditions would occur at an intersection or roadway within one-quarter mile of a sensitive receptor:

- The proposed project causes or contributes to an exceedance of the California 1-hour or 8-hour CO standards of 20 or 9.0 parts per million (ppm), respectively; or
- The incremental increase due to the project is equal to or greater than 1.0 ppm for the California 1-hour CO standard, or 0.45 ppm for the 8-hour CO standard.

AIR-7 The project creates an objectionable odor at the nearest sensitive receptor.

(3) Toxic Air Contaminants

The following factors are set forth in the *City of L.A. CEQA Thresholds Guide (2006),* for consideration on a case-by-case basis in making a determination of significance:

- The regulatory framework for the toxic material(s) and process(es) involved;
- The proximity of the toxic air contaminants to sensitive receptors;
- The quantity, volume, and toxicity of the contaminants expected to be emitted;
- The likelihood and potential level of exposure; and
- The degree to which project design will reduce the risk of exposure.

Based on these factors and criteria set forth in the SCAQMD Handbook, the project would have a significant toxic air contaminant impact, if:[17]

AIR-8 The project emits carcinogenic or toxic air contaminants that exceed the maximum incremental cancer risk of ten in one million or an acute or chronic hazard index of 1.0;

AIR-9 Hazardous materials associated with on-site stationary sources result in an accidental release of air toxic emissions or acutely hazardous materials posing a threat to public health and safety;

AIR-10 The project would be occupied primarily by sensitive individuals within a quarter mile of any existing facility that emits air toxic contaminants which could result in a health risk for pollutants identified in SCAQMD Rule 1401.

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[16] *South Coast Air Quality Management, LST Methodology: http://www.aqmd.gov/ceqa/handbook/lst/Method_final.pdf.*

[17] *SCAQMD, CEQA Air Quality Handbook, Chapter 6 (Determining the Air Quality Significance of a Project) and Chapter 10 (Assessing Toxic Air Pollutants), April 1993.*

b. Project Design Features

The following design features result in a reduction in air pollutant emissions and are proposed as part of the project.

- The project would provide high density housing within a mixed-use regional center containing commercial and entertainment activities, as well as residential and office high-rise towers. The project site is located within SCAG's 2% Strategy Opportunity Area, an area identified as preferred for high density development to reduce vehicle miles traveled and related air emissions impacts, in conjunction with regional policies to achieve among other goals, a reduction in GHGs. Given, its location, the project would support pedestrian access to a considerable range of retail and entertainment activities. The project also provides excellent access to the regional transportation system as it is located in proximity to numerous bus lines and the proposed extension of the Westside subway system (Purple Line).
- All off-road diesel construction equipment remaining on-site for more than 15 work days will be retrofitted with CARB verified Level 3 diesel particulate filters (DPF) or other control devices which achieve at least 85% reduction in particulate matter emissions, if commercially available. A list of currently available CARB verified DPFs are available on the CARB website.[18]
- Baseline standards for energy efficiency would be exceeded by utilizing design methods and technologies such as passive solar design, high-performance, insulated glass, appropriately-oriented shading devices, vertical gardens to provide enhanced thermal comfort and solar control, and a planted green roof.
- Energy-saving technologies and components would be applied to reduce the project's electrical use-profile. Examples of these components include efficient/low energy light fixtures and energy efficient heating and cooling equipment.
- Energy associated with heating and cooling loads would be reduced through the use of such techniques as high-albedo (or reflective) roofing (such as light-colored, build-up "white" roofs) and/or "green" (or vegetated) roofs.
- Commissioning would be used to ensure that the project's lighting, mechanical, heating, cooling, ventilation, and other energy and water-consuming systems are operating at their designed levels of efficiency.
- The project would be designed to meet the standards for Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council through the incorporation of green building techniques and other sustainability features.
- Trees and other landscaping would be used to shade the project's structures, open-spaces, and parking areas and as a means to capture (sequester) carbon dioxide emissions. The project includes approximately 43,141 square feet of ground-level landscaping, approximately 41 percent of the project site, and approximately 27,579 square feet of open space on a landscaped recreation deck on top of the ancillary building. It also includes additional landscaped setback areas and parkway landscaping. The ancillary building's vertical landscaping would also further reduce the heat-island effect.

[18] *http://www.arb.ca.gov/diesel/verdev/level3/level3.htm*

- To the maximum practical extent, recyclable materials would be recycled. The project would be consistent with City strategies aimed to achieve 70 percent recycling by 2020, thus exceeding LEED™ criteria which includes: diversion of 50 percent of the construction waste from land-fills; use of recycled or recycled-content material for at least 20 percent of the project's construction material total; and use of regionally-sourced material for at least 10 percent of the project's construction. Once the project is operational, this would involve providing multiple locations for the storage and collection of recyclable materials.
- Water usage (versus "business as usual") would be reduced by implementing drip irrigation and water efficient fixtures. On-site reductions in water use would reduce the amount of energy necessary to transport the water to the site, and thus reduce the project's energy demands and associated GHG emissions. Specifically, water conservation would be maximized through the use of:
    - Water efficient fixtures and appliances (e.g. high efficiency shower head toilets, and a high efficiency/demand water heater system); and
    - Specific landscaping features such as a weather-based irrigation controller with rain shutoff; matched precipitation (flow) rates for sprinkler heads; drip/microspray/subsurface irrigation where appropriate; a minimum irrigation system distribution uniformity of 75 percent; proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials; use of landscape contouring to minimize precipitation runoff; and a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.
- Electric car charging stations would be provided for tenants use.
- The project's optional automated parking system, if implemented, would further reduce GHG emissions, with construction of a smaller ancillary building and reductions in vehicle miles traveled as automobile engines are shut off at the entry to the parking structure.

c. Methodology

The evaluation of potential impacts to local and regional air quality that may result from the construction and long-term operations of the proposed project is conducted as follows:

(1) Construction Impacts

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile-source and fugitive dust emissions factors derived from CalEEMod.

The localized effects from the on-site portion of daily emissions are evaluated at nearby sensitive receptor locations potentially impacted by the project according to the SCAQMD's localized LST methodology, which utilizes on-site mass emission rate look-up tables and project specific modeling, where appropriate. LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed based on the ambient concentrations of that pollutant for each source receptor area (SRA) and distance to the nearest sensitive receptor. For PM_{10} and $PM_{2.5,}$ LSTs were derived based on requirements in SCAQMD Rule 403, Fugitive Dust. The mass rate look-up tables were developed for each SRA and can be used to determine whether or not a

project may generate significant adverse localized air quality impacts. The LST mass rate look-up tables only apply to projects that are less than or equal to five acres. If the project exceeds five acres or any applicable LST when the mass rate look-up tables are used as a screening analysis, then project specific air quality modeling model may be performed. The SCAQMD recommends that the USEPA AERMOD model be used for the project specific analysis.

The LST look-up thresholds for NOx were developed based on the 1-hr NO_2 CAAQS of 0.18 ppm[19]. However, the USEPA has promulgated a 1-hr NO2 NAAQS of 0.1 ppm based on a 98th percentile value, which is more stringent than the CAAQS. In addition to the more stringent federal 1-hr NO_2 standard, the ARB has also established a new annual standard of 0.03 ppm. The LST look-up thresholds were developed for short-term standards (less than 24 hour concentration standards). In order to determine if project emissions would result in an exceedance of 1-hr NO_2 NAAQS and annual NO_2 CAAQS, dispersion modeling was performed for NOx emissions from construction activities.

Dispersion modeling was performed using the USEPA AERMOD model with meteorological data obtained from the SCAQMD West L.A. monitoring station. Receptors were placed at sensitive receptors including residential and school uses with a 25 meter grid spacing. The ozone limiting method (OLM) was also enabled to properly calculate NO_2 conversion from NOx emissions.

A complete listing of the construction equipment by phase, construction phase duration, emissions estimation model and dispersion model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in Appendix B.1 of this Draft EIR.

(2) Operational Impacts

The CalEEMod software is used to forecast the daily regional emissions from mobile- and area-sources that would occur during long-term project operations. In calculating mobile-source emissions, the CalEEMod default trip length assumptions are applied to the average daily trip (ADT) estimates provided by the project's traffic consultant to arrive at vehicle miles traveled (VMT). Stationary-source emissions are compiled using procedures outlined in the Handbook.

Regional and localized operational air quality impacts are assessed based on the incremental increase in emissions compared to baseline conditions. Recent CEQA developments and SCAQMD guidance have defined the baseline environmental setting to be established at the time that environmental assessment commences, 2011 for the proposed project. For purposes of the operational emissions analysis, the baseline is assumed to be year 2011.

The localized effects from the on-site portion of daily emissions from project operation are evaluated at nearby sensitive receptor locations potentially impacted by the project according to the SCAQMD's localized LST methodology, which utilizes on-site mass emission rate look-up tables and project specific modeling, where appropriate. LSTs are only applicable to the following criteria pollutants: NO_x, CO, PM_{10}, and $PM_{2.5}$. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard, and are developed

[19] *Final Localized Significance Threshold Methodology. South Coast Air Quality Management District, July 2008.*

based on the ambient concentrations of that pollutant for each source receptor area (SRA) and distance to the nearest sensitive receptor. The mass rate look-up tables were developed for each SRA and can be used to determine whether or not a project may generate significant adverse localized air quality impacts.

Localized CO concentrations are evaluated by using the CALINE4 microscale dispersion model, developed by Caltrans, in combination with EMFAC2007 emission factors. Localized PM_{10} concentrations related to operation of proposed project stationary-source combustion equipment are evaluated by conducting a screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling) as necessary. The screening-level analysis consists of reviewing the proposed project's site plan and related project description to identify any new or modified stationary-source combustion equipment sources. If it is determined that the proposed project will introduce a new stationary-source combustion equipment source, or modify an existing stationary-source combustion equipment source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine proposed project impacts. All emissions calculation worksheets and air quality modeling output files are provided in Appendix B.2 of this Draft EIR.

(3) Toxic Air Contaminants (TAC) Impacts (Construction and Operations)

Potential TAC impacts are evaluated by conducting a screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling), as necessary. The screening-level analysis applies only to operations of projects and consists of identification of new or modified TAC emissions sources. If it is determined that a proposed project would introduce a potentially significant new source, or modify an existing TAC emissions source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine proposed project impacts.

The CARB screening criteria for impacts on new sensitive land use development (e.g. new project residents) is based on a minimum separation between the new sensitive land use and existing sources of TAC emissions. The CARB recommends avoiding new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles per day.[20] The CARB siting recommendations also recommends that sensitive receptors should not be sited within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater), 50 feet for typical gas dispensing facilities or within 300 feet of a dry cleaning facility that uses perchloroethylene, among other siting recommendations.

The CARB screening criteria does not provide methodologies to address construction impacts of TAC emissions, i.e. diesel particulate matter. In order to address such impacts, CARB and SCAQMD guidance for evaluating operations impacts on the potential health risks to nearby residents and students were applied to the project's construction activity with modification to address the short-term nature of the project's construction to such impacts. The assessment of diesel particulate emissions was conducted to assess this potential risk using the same assumptions that were used for the analysis of localized air quality emissions,

[20] *The basis for the recommended distance is a southern California study that showed measured concentrations of vehicle-related pollutants drop dramatically within approximately 300 feet of the I-710 and I-405 freeways; and a second study that showed that concentrations of traffic related pollutants declined by 70 percent at a distance of 500 feet. CARB concluded that these findings were also consistent with air quality modeling and risk analyses done by the CARB staff.*

as discussed above. As such, this analysis includes all diesel exhaust emissions associated with on-site heavy duty construction equipment and estimates the risk at nearby sensitive receptors.

Cancer risk is often expressed as the maximum number of new cases of cancer projected to occur in a hypothetical population of one million people due to exposure to a specific cancer-causing substance after a 24-hour a day, 365 days a year exposure outdoors at the same concentration over a lifetime of 70 years. This probability is usually expressed in terms of the estimated number of people who will develop cancer per one million people exposed. It is important to understand that this cancer risk estimate represents the probability that people develop some form of cancer. The estimated risk does not represent mortality rates. It is also important to understand that the risk described in these calculations reflects a level of exposure that would be virtually impossible to experience, and that for most individuals, exposure to a particular contaminant, such as diesel particulate matter would be considerably less due to shorter duration of residence in the area, amount of time spent at the residence daily and throughout the year, and the split between time spent indoors versus outdoors.

(4) Odor Impacts (Construction and Operations)

Potential odor impacts are evaluated by conducting a screening-level analysis followed by a more detailed analysis (i.e., dispersion modeling) as necessary. The screening-level analysis consists of reviewing the proposed project's site plan and project description to identify new or modified odor sources. If it is determined that the proposed project will introduce a potentially significant new odor source, or modify an existing odor source, then downwind sensitive receptor locations are identified and site-specific dispersion modeling is conducted to determine proposed project impacts.

d. Analysis of Project Impacts

Air quality emissions would be mostly similar for development with the Conventional Parking Option and the Automated Parking Option. For construction, both parking options would require similar excavation and grading for site preparation, similar foundation work, and substantially similar building erection programs; and the largest building component, the residential tower, would be the same. Likewise, project operations would be the same, as both would accommodate the same amount of parking.

Notwithstanding, the Automated Parking Option would reduce air quality emissions in two ways: First, the smaller ancillary building would require a less extensive construction program with less use of natural resources, and a lower use of powered construction equipment. Second, vehicle engines would be cut off at the entry to a garage, reducing the vehicle emissions that would normally be created by travel within a multilevel parking structure. The following analysis focuses on the Conventional Parking Option, which would have somewhat greater air emissions than the Automated Parking Option. However, the use of an automated parking system would be a notable example of a project design feature that contributes to reduction of air emissions in a manner that exceeds business as usual.

(1) Construction

(a) Regional Construction Impacts

Construction of the proposed project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. In addition, fugitive dust emissions would result from excavation and debris

removal. Mobile source emissions, primarily NO_x, would result from the use of construction equipment such as dozers, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds. Construction emissions can vary substantially from day-to-day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions. Through the use of construction equipment retrofitted with CARB verified Level 3 DPF or other minimizations control devices, emissions would be reduced to achieve at least an 85% reduction in particulate matter emissions. The assessment of construction air quality impacts considers each of these potential sources and project design features.

The estimates of construction emissions below are directly related to the duration and intensity of various construction activities, and the daily emissions which are the basis for the analysis below, vary according to the activities being performed on any one day. For example, the construction activity that would generate the greatest emissions for all pollutants other than PM_{10} would be due to continuous concrete pours for building foundations that would occur over a 12 hour period on only approximately three to five non-continuous days over the three year construction period. At the same time the overall emissions associated with building construction, an activity occurring for approximately 30 months, are generally lower than for the very short term continuous concrete pours and other construction activities.

The emissions levels in **Table IV.B-4** *Unmitigated Proposed Project -Estimate of Construction Emissions*, represent the highest daily emissions projected to occur on any one day. As presented in Table IV.B-4, construction-related daily maximum regional emissions would not exceed the SCAQMD daily significance thresholds for CO, $PM_{2.5}$, VOC, or SO_X. However, maximum regional emissions would exceed the SCAQMD daily significance thresholds for NO_X and PM_{10} during periods of heavy use of heavy-duty construction equipment. Therefore, regional construction emissions resulting from the project would result in a significant short-term impact.

These emission forecasts reflect a specific set of conservative assumptions in which the entire project would be built out over 36 months. Because of this conservative assumption, actual emissions could be less than those forecasted. For example, if construction is delayed or occurs over a longer time period, maximum daily emissions could be reduced because of, for example, (1) the availability of a more modern, cleaner burning, construction equipment fleet mix, or (2) a less intensive buildout schedule (lower daily emissions occurring over a longer time interval).

(b) Localized Construction Impacts

The unmitigated maximum daily localized emissions and the localized significance thresholds are also presented in Table IV.B-4. The conservative estimates of project impacts on localized daily emissions for NOx, PM_{10}, $PM_{2.5}$, and CO for each phase of construction were compared to the applicable screening thresholds, which are based on construction site acreage and distance to closest sensitive receptor. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD, using look-up tables to determine the localized construction emissions thresholds for the project. As shown in Table IV.B-4, maximum localized construction emission estimates do not exceed the LSTs for any of the criteria pollutants for which local impacts were analyzed (NOx, CO, PM_{10} or $PM_{2.5}$).

As previously discussed, the U.S. EPA promulgated a new 1-hour 98th percentile NAAQS for NO_2 (0.1 ppm [188 µg/m^3]), which went into effect on April 12, 2010. The SCAQMD LST screening tables for NO_2 are based

Table IV.B-4

Unmitigated Proposed Project -
Estimate of Construction Emissions [a]
(pounds per day)

Regional Emissions

	VOC	NOx	CO	SOx	PM_{10} [b]	$PM_{2.5}$ [b]
Individual Phases						
Grading/Debris Removal	15	128	72	<1	86	5
Building Foundation (Continuous Pour)	39	330	217	<1	328	13
Building Concrete Pour	12	83	66	<1	41	2
Building Construction	34	104	90	<1	6	1
Emissions during Overlapping Phases [d]	**39**	**330**	**217**	**<1**	**328**	**13**
Maximum Regional Emissions	**39**	**330**	**217**	**<1**	**328**	**13**
SCAQMD Daily Significance Thresholds	75	100	550	150	150	55
Over/(Under)	(36)	230	(333)	(150)	178	(42)
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**Yes**	**No**

Localized Emissions

	VOC	NOx	CO	SOx	PM_{10} [b]	$PM_{2.5}$ [b]
Individual Phases						
Grading/Debris Removal	10	82	46	<1	3	2
Building Foundation (Continuous Pour)	12	87	52	<1	1	1
Building Concrete Pour	8	58	34	<1	<1	<1
Building Construction	32	98	70	<1	<1	<1
Emissions during Overlapping Phases [d]	**32**	**162**	**96**	**<1**	**3**	**2**
Maximum Localized Emissions	**32**	**162**	**96**	**<1**	**3**	**2**
SCAQMD Daily Significance Thresholds	-	164	815	-	6	4
Over/(Under)	-	(2)	(719)	-	(3)	(2)
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[a] *Emission quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the URBEMIS model printout sheets and/or calculation worksheets that are presented in Appendix B.1.*

[b] *PM_{10} and $PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[c] *The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Los Angeles County Coastal) for a two acre site with sensitive receptors located adjacent to the construction activity.*

[d] *Emissions during overlapping phases is assumed to potentially occur between non-continuous pour and building construction.*

Source: PCR Services Corporation, 2011.

on the 1-hour CAAQS of 0.18 ppm which are less stringent than the NAAQS. In addition, the ARB has newly promulgated an annual NO_2 threshold of 0.03 ppm. The SCAQMD has not revised the LST screening tables to correspond to the new U.S. EPA 1-hour NO_2 standard or the state annual NO_2 standard. In order to take into account the more stringent 1-hr NO_2 NAAQS and the new annual NO_2 CAAQS, NO_x emissions were also analyzed using dispersion modeling to determine whether concentrations exceed NAAQS, even though the NO_x levels identified in Table IV.B-4 did not exceed the LST.

Thus, the localized effects from the on-site construction emissions of NO_2 and annual PM_{10} were analyzed using the AERMOD dispersion model for the project's construction, based on the maximum NO_2 and PM_{10} emissions shown in Table IV.B-4.

The results of the dispersion modeling are presented in **Table IV.B-5**, *Unmitigated Proposed Project – Localized Construction Dispersion Analysis*. It should be noted that the results listed below are maximum values and do not represent relative average pollutant concentrations. Annual PM_{10} at the residential and school uses are 0.9 and 0.5 ug/ m^3 respectively. Therefore, annual PM10 concentrations resuting from construction emissions would not exceed the threshold of 1 ug/m^3 at the closest sensitive receptors.

Table IV.B-5

Unmitigated Proposed Project –
Localized Construction Dispersion Analysis

Pollutant and Averaging Period[a]	Beverly Hills High School	Nearby Residential
PM_{10} (Annual) – (ug/m3)		
Project Incremental Concentration	0.5	0.9
LST Threshold	1.0	1.0
Over/(Under)	(0.6)	(0.1)
Exceed Threshold?	**No**	**No**
NO_2 (1-hr) – (ug/m3) – 98th Percentile		
Project Incremental Concentration	168.9	127.9
LST Threshold[c]	67.7	67.7
Over/(Under)	101.2	60.2
Exceed Threshold?	**Yes**	**Yes**
NO_2 (Annual) – (ug/m3)		
Project Incremental Concentration	27.4	55.7
LST Threshold[d]	18.8	18.8
Over/(Under)	8.6	36.9
Exceed Threshold?	**Yes**	**Yes**

[a] *All modeling runs assume maximum emissions from each phase are occurring simultaneously.*
[b] *3-year average of the 98th percentile of the yearly distribution of 1-hour daily maximum concentrations.*
[c] *Threshold is calculated based on the federal 1-hr NO2 threshold of 0.1 ppm (98th percentile) and the previous 3-years of ambient NO_2 concentration data from the West L.A. monitoring station*
[d] *Threshold is calculated based on the state annual NO2 threshold of 0.03 ppm and the previous 3-years of ambient NO_2 concentration data from the West L.A. monitoring station*

Source: PCR Services Corporation, 2011.

The maximum 1-hr and annual NO_2 concentrations also occur during the building construction and concrete pouring phase at the residential uses east of the project site. The maximum 1-hr NO_2 construction concentrations at the residential uses and Beverly Hills High School would be 127.9 ug/ m^3 and 168.9 ug/ m^3 respectively. The annual NO_2 concentrations at the residential and school uses would be 55.7 ug/ m^3 and 27.4 ug/ m^3 respectively. As shown in Table IV.B-5, maximum NO_2 concentrations during construction activities exceed allowable thresholds at the closest residential uses to the east and the high school to the

south. As such, localized air quality impacts during construction would be significant for NO_2 and mitigation measures would be required.

(c) Toxic Air Contaminants

A Health Risk Analysis (HRA) was conducted to evaluate the carcinogenic risk to students and staff resulting from exposure to localized sources of TACs during construction of the project.

The California Office of Environmental Health Hazard Assessment (OEHHA) has established risk factors for TACs based on a 70-year continuous exposure and provides methodologies to account for lesser exposure durations, such as workers (46-year, 8 hours/day). The California Environmental Protection Agency (EPA), OEHHA has established methodologies to calculate risks from other exposure durations such as those representing student exposure-duration (180 days per year) and school employee-duration (240 days per year). The established methodologies and 70 year exposure period for analysis are intended to address conditions related to on-going human activity rather than short-term exposure to TACs that might occur due to a short term event, such as the construction of the proposed project. There is no recognized threshold for assessing an exposure duration of only 3 years. Nonetheless, cancer risk from inhalation of exhaust (e.g., diesel particulate matter) from construction of this project was calculated using the USEPA recommended AERMOD dispersion model, with modification to address the project's 3 year construction period. Output from the dispersion analysis was used to estimate the TAC concentrations. The cancer risk estimate was then calculated based on those estimated diesel particulate matter concentrations using the risk methodology promulgated by the OEHHA and SCAQMD.

The specific calculations and assumptions used to determine the cancer risks are included in Appendix B.3 of this Draft EIR. The risk assessment followed in this analysis is designed to produce conservative (high) estimates of the risk posed by TACs. The conservative nature of the analysis is due to the following factors:

- As a conservative measure, the SCAQMD does not recognize indoor adjustments for residents. However, studies have shown that the typical person spends approximately 87 percent of their time indoors, 5 percent of their time outdoors, and 7 percent of their time in vehicles. A diesel particulate matter exposure assessment showed that an average indoor concentration was 2.0 $\mu g/m^3$, compared with an outdoor concentration of 3.0 $\mu g/m^3$.[21]
- The exposure to diesel particulate matter is assumed to occur 8 hours per day, 264 days a year (22 days per month), for 3 years, based on the proposed project construction schedule. The emission rate for construction diesel particulate matter is calculated using a high-level construction intensity occurring everyday of the 36-month construction period. The likelihood of construction intensity remaining at that level for the entire 36 months is unlikely, and the actual risks would likely be much lower than indicated by the extreme conditions analyzed.
- The AERMOD air dispersion model as applied in this study is also designed to provide conservative estimates of air pollutant concentrations during construction.

[21] *South Coast Air Quality Management District (SCAQMD), 2002. Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions.*

As shown in **Table IV.B-6**, *Cancer Risk Calculations,* the threshold for significance used to evaluate the exposure to TACs is 10 excess cancer cases per one million people. This is the threshold recommended by the SCAQMD and the CARB explicitly to characterize impacts attributable to projects that introduce new sources of TAC emissions in an area.

Table IV.B-6

Cancer Risk Calculations

Configuration	Cancer Risk (# in one million)
Child, School	1.0
Child, Resident	2.0
Adult, School worker	1.4
Adult, Resident	3.0
Maximum individual cancer risk threshold	10

Source: PCR Services Corporation, 2011

As shown in Table IV.B-6, the project would not emit carcinogenic toxic air contaminants that would individually or cumulatively exceed the maximum individual cancer risk of ten in one million. Potential cancer risk due to diesel particulate matter were reduced with implementation of the project design feature requiring all off-road diesel construction equipment (remaining on-site for more than 15 work days) to be retrofitted with CARB verified Level 3 DPF or other control devices. This would reduce diesel particulate emissions from off-road construction equipment by approximately 85 percent. The analysis of health risk therefore yields a maximum off-site adult individual cancer risk of 3 in a million and 2 in a million for off-site children at the residences to the east. The maximum cancer risk at the Beverly Hills High School to the south would be 1 in a million for students and1.4 in a million for staff, respectively. As the project would not emit carcinogenic toxic air contaminants that would individually or cumulatively exceed the maximum individual cancer risk threshold of ten in one million, project-related toxic emission impacts would be less than significant.

(d) Odors

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

(2) Operational Impacts

(a) Regional Operational Impacts

Regional air pollutant emissions associated with proposed project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., electricity generation and natural gas consumption) are classified by the SCAQMD as regional stationary source emissions. Criteria pollutant emissions associated with the production and consumption of energy were calculated using emission factors from the Handbook (Appendix to Chapter 9).

Mobile-source emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the increase in daily VMT by applicable EMFAC2007 emissions factors. As shown in **Table IV.B-7**, *Unmitigated Proposed Project –Operational Emissions*, regional emissions resulting from operation of the project are substantially below applicable thresholds for VOC, NOx, SOx, and $PM_{2.5}$. As a result, impacts related to regional emissions from operation of the proposed project would be less than significant.

(b) Localized Operational Impacts

The conservative estimates of on-site daily emissions for NOx, PM_{10}, $PM_{2.5}$, and CO for each phase of operation were compared to the applicable screening thresholds, which are based on site acreage and distance to closest sensitive receptor. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine the localized construction emissions thresholds for the project. The unmitigated maximum daily localized emissions and the localized significance thresholds are presented in Table IV.B-7. As shown, maximum localized operation emission estimates are substantially less than the LSTs for NOx or CO, PM_{10} and $PM_{2.5}$.

The SCAQMD recommends an evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse. As detailed in Section IV.I, Traffic and Circulation, none of the project intersections would meet these criteria.

Notwithstanding, localized CO impacts were analyzed for the project at two representative intersections based on the highest V/C ratios and proximity to the project site.

- South Santa Monica Boulevard and Wilshire Boulevard;
- Sepulveda Boulevard and Santa Monica Boulevard.

CO concentration levels were forecasted at these two intersections using the CALINE4 dispersion model developed by the California Department of Transportation, using peak-hour traffic volumes and conservative meteorological assumptions. Conservative meteorological conditions include low wind speed, stable atmospheric conditions, and the wind angle producing the highest CO concentrations for each case. CO concentrations were modeled under the "No Project" and "With Project" conditions using baseline (2010) emission factors. As shown in **Table IV.B-8**, *Local Area Carbon Monoxide Dispersion Analysis*, project-generated traffic volumes are forecasted to have a negligible effect on the projected 1-hour and 8-hour CO

Table IV.B-7

Unmitigated Proposed Project Operational Emissions[a] (Pounds per Day)

Emission Source	VOC	NOX	CO	SOx	PM10	PM2.5
Regional Emissions						
Mobile	9	21	81	<1	11	1
Natural Gas[b]	<1	2	<1	<1	<1	<1
Area Sources	7	<1	25	<1	<1	<1
Total Net	**16**	**24**	**107**	**<1**	**11**	**1**
SCAQMD Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	**(39)**	**(31)**	**(443)**	**(150)**	**(139)**	**(54)**
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Localized Emissions						
Natural Gas[b]	<1	2	<1	<1	<1	<1
Area Source	7	<1	25	<1	<1	<1
Total Net	**8**	**4**	**27**	**<1**	**<1**	**<1**
Localized Significance Threshold	**N/A**	**103**	**562**	**N/A**	**1**	**1**
Over/(Under)	**N/A**	**(99)**	**(535)**	**N/A**	**(1)**	**(1)**
Exceed Threshold?	**N/A**	**No**	**No**	**N/A**	**No**	**No**

Note: Numbers may not add up exactly due to rounding.

[a] *Mobile and area emissions are calculated using the CalEEMod emissions model. Area sources include natural gas consumption, landscape fuel consumption, residential consumer products and miscellaneous sources (e.g., among other things, commercial solvent usage, architectural coatings). Emissions due to project-related electricity generation are calculated based on guidance provided in the Handbook.*

[b] *Stationary source emissions include a 14 percent reduction consistent with the above listed project design features*

Source: PCR Services Corporation, 2011.

concentrations at the respective intersection locations. Since a significant impact would not occur at the intersections operating at the highest V/C ratio, no significant impacts would occur at any other analyzed roadway intersection as a result of weekday or weekend project-generated traffic volumes. Thus, the proposed project would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions would be less than significant.

(c) Toxic Air Contaminants

(i) Impacts to Off-Site Population

The primary sources of potential air toxics associated with proposed project operations include diesel particulate matter from delivery trucks (e.g., truck traffic on local streets and on-site truck idling) and emergency backup generators. The SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate matter (e.g., truck stops and warehouse distribution facilities) and

Table IV.B-8

Local Area Carbon Monoxide Dispersion Analysis

Intersection	Peak Period[a]	Maximum 1-Hour 2010 Base Concentration [b] (ppm)	Maximum 1-Hour 2010 w/ Project Concentration [c] (ppm)	Significant 1-Hour Impact? [d] (>20 ppm)	Maximum 8-Hour 2010 Base Concentration (ppm)	Maximum 8-Hour 2010 w/ Project Concentration [f] (ppm)	Significant 8-Hour Impact ? (>9.0 ppm)d
South Santa Monica Boulevard and Wilshire Boulevard	A.M.	6.8	6.8	**No**	3.92	3.99	**No**
	P.M.	6.6	6.6	**No**	3.99	4.06	**No**
Sepulveda Boulevard and Santa Monica Boulevard	A.M.	6.7	6.7	**No**	4.2	4.2	**No**
	P.M.	6.6	6.6	**No**	4.06	4.06	**No**

ppm = parts per million.

[a] *Peak hour traffic volumes are based on the Traffic Analysis prepared for the project by Fehr & Peers/Kaku Associates, April 2011.*
[b] *SCAQMD 2010 1-hour ambient background concentration (4.4 ppm) + 2010 Base traffic CO 1-hour contribution.*
[c] *SCAQMD 2010 1-hour ambient background concentration (4.4 ppm) + 2010 w/ project traffic CO 1-hour contribution.*
[d] *The most restrictive standard for 1-hour CO concentrations is 20 ppm and for 8-hour concentrations is 9.0 ppm.*
[e] *SCAQMD 2010 8-hour ambient background concentration (2.8 ppm) + 2010 Base traffic CO 8-hour contribution.*
[f] *SCAQMD 2010 8-hour ambient background concentration (2.8 ppm) + 2010 w/ project traffic CO 8-hour contribution.*

Source: PCR Services Corporation, 2011; emission factor and dispersion modeling output sheets are provided in Appendix B.2].

has provided guidance for analyzing mobile source diesel emissions.[22] The CARB siting guidelines define a warehouse as having more than 100 truck trips or 40 refrigerated truck trips per day. Based on this, the propose project does not meet the definition of a warehouse, and is therefore not considered to be a substantial source of diesel particulate matter warranting a refined HRA.

As mentioned previously, the CARB mandated ATCM limits diesel fueled commercial vehicles (delivery trucks) to idle for no more than five minutes at any given time. The increase in potential localized air toxic impacts from on-site sources of diesel particulate emissions would be minimal since the proposed project does not involve use of heavy-duty trucks. Therefore, further analysis is not necessary, and this ATCM would significantly limit any potential incremental increase in emissions from possible truck activity.

The proposed project would likely include the installation and operation of diesel-fired generators for emergency power generation. Unless a blackout occurs, these generators would be operated for only a few hours per month for routine testing and maintenance purposes. The Applicant would be required to obtain a permit to construct and a permit to operate any standby generators under SCAQMD Rules 201, 202, and 203. Under SCAQMD Regulation XIII, all generators must meet BACT requirements to minimize emissions of PM_{10} (as well as CO, VOC, and NO_X emissions). SCAQMD Regulation XIV requires operation prior to issuance of a permit, to demonstrate that operation of the proposed generators will not result in increased health risk due

[22] *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.*

to TAC exposures above the established criteria. Therefore the installation and operation of back-up generators would result in less than significant impacts.

(ii) Impacts from TACs to On-Site Population

The CARB's *Air Quality and Land Use Handbook: A Community Health Perspective (March 2005)* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports, etc.) that should be considered when siting sensitive land uses (e.g., residences). A key air pollutant common to these sources is particulate matter from diesel engines. Because living near to sources of air toxics may increase both cancer and non-cancer health risks, the CARB recommends that proximity be considered in the siting of new sensitive land uses. The CARB's recommendations are based primarily on data showing that the air pollution exposure can be reduced as much as 80 percent with recommended separation. The CARB recommends that site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined "buffer zones." In addition, the CARB recognizes that site-specific analysis is preferred over use of the recommended site distances, which is similar to a screening level approach.

According to a visual site survey and search on the SCAQMD Facility Information (FIND) database, no facilities are located within the above mentioned siting guidelines. Five facilities containing emergency diesel generators and natural gas boilers were found to be located within ¼ mile of the project site. However, emergency generators and natural gas boilers are not specifically included in the CARB Land Use guidance as a major source of TAC emissions.

Because the project is not located sufficiently proximate to the listed source types, the siting of residential uses on the project site would result in a less than significant impact with regard to the exposure of on-site residents to the TAC emission sources identified in ARB's siting recommendations (i.e., the project would not site residential uses in a high cancer risk area due to ambient air quality).

(d) Odors

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

(e) SCAQMD CEQA Air Quality Handbook Policy Analysis

In accordance with the procedures established in the Handbook, the following criteria are required to be addressed in order to determine the proposed project's consistency with SCAQMD and SCAG policies:

1. Will the project result in any of the following:

   - An increase in the frequency or severity of existing air quality violations; or
   - Cause or contribute to new air quality violations; or

- Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2. Will the project exceed the assumptions utilized in preparing the AQMP?

With respect to the first criterion, SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in a regional context during construction and project occupancy. These forecasts are provided earlier in this section. Impacts to localized concentrations of PM_{10}, $PM_{2.5}$, CO, and NO_2 have been analyzed for the project. SO_2 emissions would be negligible during construction and long-term operations, and therefore would not have potential to cause or affect a violation of the SO_2 ambient air quality standard. Because VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOC. Due to the role VOC plays in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. Results of the analyses indicate that the increases in PM_{10} and $PM_{2.5}$ emissions during construction would exceed the SCAQMD-recommended significance thresholds at sensitive receptors in close proximity to the project site. It should be noted that the potential for this impact would be short-term and would not have a long-term impact on the region's ability to meet State and federal air quality standards. In addition, the project would be required to comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of PM. The project's maximum potential NO_X and CO daily emissions during construction were analyzed to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown in Table IV.B-4, the maximum estimate of localized emissions for these two criteria pollutants would remain below their respective SCAQMD LST Significance Thresholds. However, the dispersion analysis of NO_2 concentrations at nearby sensitive receptors shown in Table IV.B-5 indicates the levels of NO_2 would exceed the 1-hr NO_2 NAAQS and annual NO_2 CAAQS.[23] As such, localized impacts (i.e. potential to violate either the NAAQS or the CAAQS at sensitive receptor locations) that may result from construction-period air pollutant emissions would be potentially significant, and mitigation measures are required

Impacts to localized concentrations of PM_{10}, $PM_{2.5}$, CO, and NO_2 have been analyzed for operation of the project. SO_2 emissions would be negligible during construction and long-term operations, and therefore would not have potential to cause or affect a violation of the SO_2 ambient air quality standard. Because VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOC. Due to the role VOC plays in ozone formation, it is classified as a precursor pollutant and only a regional emissions threshold has been established. Results of the analyses indicate that the increases in pollutant emissions during operation would not exceed the LST significance thresholds at sensitive receptors in close proximity to the project site. Based on methodologies set forth by the SCAQMD, another measure of local area air quality impacts that can indicate whether the proposed project would cause or affect a violation of an air quality standard would be based on the estimated CO concentrations at selected receptor locations located in close proximity to the project site. As indicated earlier, CO emissions were analyzed using the CALINE-4 model. No violations of the State and federal carbon monoxide standards are projected to occur.

Overall, the project would result in less than significant impacts with regard to CO, and SO_2, concentrations during project construction and less than significant for all pollutants during operations. While NO_2 and

[23] *Please note that NO_x is used when describing emissions of nitrogen oxides, but that the AAQS is in terms of NO_2 (pollutant concentration). The same applies for SO_x (emissions) versus SO_2 (AAQS concentration).*

PM_{10} and $PM_{2.5}$ concentrations during construction would exceed the SCAQMD significance threshold, prior to mitigation, the impact would be short-term in nature and would not have a long-term impact on the region's ability to meet State and federal air quality standards. As such, the project would meet the first AQMP consistency criterion.

With respect to the second criterion for determining consistency with SCAQMD and SCAG air quality policies, it is important to recognize that air quality planning within the Basin focuses on the attainment of ambient air quality standards at the earliest feasible date. Projections for achieving air quality goals are based on assumptions regarding population, housing and growth trends. Thus, the SCAQMD's second criterion for determining project consistency focuses on whether or not the proposed project exceeds the assumptions utilized in preparing the forecasts presented in the AQMP. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (a) consistency with the population, housing, and employment growth projections; (b) project mitigation measures; and (c) appropriate incorporation of AQMP land use planning strategies. The following discussion provides an analysis of each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP in part if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2007 AQMP, three sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan, SCAG's Growth Management Chapter of the *Regional Comprehensive Plan and Guide* (RCPG), and SCAG's *2004 Regional Transportation Plan* (RTP). On May 8, 2008, SCAG adopted the 2008 Regional Transportation Plan which is not incorporated into the 2007 AQMP. It is expected that the next update to the AQMP will be based on the 2008 RTP. The RTP also provides socioeconomic forecast projections of regional population growth. The project is consistent with the types, intensity and patterns of land use envisioned for the site vicinity in the RCPG. The population, housing, and employment forecasts which are adopted by SCAG's Regional Council are based on the local plans and policies applicable to the specific area, such as the Century City North Specific Plan, which establishes maximum development caps for Century City. It may be noted that the proposed project is controlled by trip limits which ensure that project development will fall within the planned development limits for Century City. The local plans and policies are used by SCAG in all phases of implementation and review. is considered here.

The 2008 RTP projects that population in the Los Angeles subregion will grow by about 79,800 persons between 2011 and 2016. The proposed project is projected to result in a net population increase of approximately 379 persons, which is 0.47 percent of the total population growth projected for the subregion. The RTP projects that employment in the subregion will grow by about 38,277 jobs between 2011 and 2016. The proposed project would only add only a few employees for security and maintenance of the residential building. Such levels of population and employment growth are consistent with the population and employment forecasts for the subregion as adopted by SCAG. Because the SCAQMD has incorporated these same projections into the AQMP, it can be concluded that the proposed project would be consistent with the projections in the AQMP.

- Does the project implement all feasible air quality mitigation measures?

Implementation of all feasible mitigation measures is recommended to reduce air quality impacts to the extent feasible. The proposed project would incorporate a number of key control measures identified by the SCAQMD, as summarized below. As such, the proposed project meets this AQMP consistency criterion since all feasible mitigation measures would be implemented.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

The proposed project would serve to implement a number of land use policies of the City of Los Angeles and SCAG. With regard to land use developments, such as the proposed project, air quality policies focus on the reduction of vehicle trips and vehicles miles traveled. The proposed project, by virtue of its location and design, exhibits many attributes that have a positive direct and indirect benefit with regard to the reduction of vehicle trips and vehicles miles traveled. Specifically, the proposed project develops 283 residential units in the middle of Century City, an existing highly urbanized commercial district and employment center located within the urbanized greater West Los Angeles area. Thus, the project would notably increase the housing supply in proximity to a large employment center thereby providing opportunities to create linkages between employment and residential centers that directly translate to reductions in vehicle trips and vehicle miles traveled. The project site is located within SCAG's 2% Strategy Opportunity Area, an area identified as preferred for high density development to reduce vehicle miles traveled and related air emissions impacts, in conjunction with regional policies to achieve among other goals. As a function of the urbanized level of activity in the project area, the project site is served by the Santa Monica Transit Parkway, access to bus service on Santa Monica Boulevard and Century Park East, and proximity to proposed stations for the extension of the Westside Subway (Purple Line).

Additional means by which project development would reduce vehicle trips and vehicle miles traveled is by encouraging pedestrian activity by placing residential population within walking distance of numerous employment, commercial/service and entertainment opportunities; and improving street-level pedestrian connectivity consistent with the Greening of Century City Pedestrian Connectivity Plan. Furthermore, the project would represent an investment in high quality urban housing and redevelopment of an underutilized property within a major regional center in an area of existing public infrastructure. Thus, project development would reduce costs on infrastructure construction and make better use of existing facilities and in so doing would support the sustainability of the community, all of which are desirable relationships from the perspective of promoting both land use and air quality policies. As the project would support the SCAQMD objective of reducing vehicle miles traveled and associated air emissions, the proposed project would be consistent with AQMP land use policy.

In conclusion, the determination of AQMP consistency is primarily concerned with the long-term influence of the project on air quality in the Basin. While development of the project would result in short-term regional impacts, project development would not have a long-term impact on the region's ability to meet State and federal air quality standards. The project would comply with SCAQMD Rule 403 and would implement all feasible mitigation measures for control of PM_{10} and $PM_{2.5}$. Also, the project would be consistent with the goals and policies of the AQMP for control of fugitive dust. As discussed above, the project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

(f) City of Los Angeles Policies

As described in the Regulatory discussion, above, the City of Los Angeles General Plan was prepared in response to California state law requiring that each city and county adopt a long-term comprehensive general plan. Accordingly, the City has included an Air Quality Element as part of its General Plan to aid the greater Los Angeles region in attaining the state and federal ambient air quality standards at the earliest feasible date, while still maintaining economic growth and improving the quality of life. The City's Air Quality Element and the accompanying Clean Air Program acknowledge the inter-relationships between transportation and land use planning in meeting the City's mobility and clean air goals.

The following City Air Quality Element goals, objectives and policies are relevant to the proposed project:

Goal 2—Less reliance on single occupant vehicles with fewer commute and non-work trips.

- Objective 2.1—It is the objective of the City of Los Angeles to reduce work trips as a step towards attaining trip reduction objectives necessary to achieve regional air quality goals.

Goal 4—Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

- Objective 4.1—It is the objective of the City of Los Angeles to include regional attainment of ambient air quality standards as a primary consideration in land use planning.
  - Policy 4.1.1—Coordinate with all appropriate regional agencies in the implementation of strategies for the integration of land use, transportation, and air quality policies.
- Objective 4.2—It is the objective of the City of Los Angeles to reduce vehicle trips and vehicle miles traveled associated with land use patterns.
  - Policy 4.2.2—Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.

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

Overall, no significant impacts would occur as a result of project development with respect to compatibility with applicable air quality policies as set forth in the City's General Plan Air Quality Element.

4. CUMULATIVE IMPACTS

a. Construction

Of the 40 related projects that have been identified within the project area, there are a number of related projects that have not yet been built or are currently under construction. Since the Applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be entirely speculative. For this reason, the SCAQMD's methodology to assess a project's cumulative impact differs from the cumulative impacts methodology employed elsewhere in this Draft EIR.

With respect to the project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies to reduce criteria pollutant emissions outlined in the AQMP pursuant to Federal Clean Air Act mandates. As such, the proposed project would comply with SCAQMD Rule 403 requirements, and implement all feasible mitigation measures. In addition, the proposed project would comply with adopted AQMP emissions control measures. Per SCAQMD rules and mandates as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects Basin-wide, which would include each of the related projects mentioned above. Nevertheless, construction-period NO_X mass regional emissions, and localized NO_2 and PM_{10} emissions associated with the proposed project are already projected to result in a significant impact to air quality. As such, cumulative impacts to air quality during proposed project construction would also be significant and unavoidable.

Similar to the proposed project, the greatest potential for TAC emissions at each related project would involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. According to SCAQMD methodology, health effects from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. As described further below, the proposed project's contribution to cancer risk from construction activities would be less than significant with mitigation. Related projects that have not already been built would not result in a long-term (i.e., 70 years) substantial source of TAC emissions with no residual emissions after construction and corresponding individual cancer risk. Thus, TAC emissions from the related projects are anticipated to be less than significant individually and cumulatively.

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

b. Operation

The SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts.

As discussed earlier, the SCAQMD has developed a comprehensive plan, the 2007 AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the Basin is currently in nonattainment for ozone, PM_{10} and $PM_{2.5}$, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

> *"A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency…"*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the South Coast Air Quality Management District's (SCAQMD) adopted 2007 Air Quality Management Plan (AQMP).

The proposed project would not conflict with or obstruct implementation of the applicable air quality plan, which in this case is the AQMP. A project is deemed inconsistent with air quality plans if it results in population and/or employment growth that exceeds growth estimates in the applicable air quality plan. In turn, the AQMP relies upon growth projections adopted by the SCAG, which in turn, relies upon adopted General Plan growth projections. Consequently, compliance with the City's General Plan typically results in compliance with the AQMP.

As discussed above, the project would not result in population and/or employment growth that exceeds growth estimates in the AQMP. The project would comply with all rules and regulations as implemented by the SCAQMD and the CARB, and would conform to the standards and guidelines of the City of Los Angeles General Plan. Therefore, it was determined that the proposed project was consistent with the AQMP. Thus, given the project's consistency with the AQMP, the project's incremental contribution to cumulative air quality effects is not cumulatively considerable, per CEQA Section 15064(h)(3).

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. Instead, SCAQMD's approach to determining cumulative air quality impacts for criteria air pollutants is to first determine whether or not the proposed project would result in a significant project-level impact to regional air quality based on SCAQMD significance thresholds. If not, then the lead agency needs to consider the additive effects of related projects only if the proposed project is part of an ongoing regulatory program or is contemplated in a Program EIR, and the related projects are located within approximately one mile of the project site; conditions not applicable to the proposed project.

The SCAQMD recommends that project specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above, peak daily operation-related emissions would not exceed the SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the proposed project would not result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Therefore, the emissions of non-attainment pollutants and precursors generated by project operation in excess of the SCAQMD project-level thresholds would be cumulatively less than significant.

With respect to TAC emissions, neither the project nor any of the identified related projects (which are largely residential, restaurant, and retail/commercial developments), would represent a substantial source of long-term TAC emissions. Uses typically associated with TAC emissions include large-scale industrial, manufacturing, and transportation hub facilities. Based on recommended screening level siting distances for TAC sources, as set forth in the CARB's Land Use Guidelines, the project and related projects would not result in a cumulative impact requiring further evaluation. However, the project and each of the related projects would likely generate minimal TAC emissions related to the use of consumer products, landscape maintenance activities, among other things. As mentioned previously, the project is not expected to include gasoline dispensing land uses or boilers. Pursuant to the law enacted in 1983 by California Assembly Bill 1807 (Tanner, Stats. 1983, ch. 1047), as amended,[24] which directs the CARB to identify substances such as TAC and adopt ATCMs to control such substances, the SCAQMD has adopted numerous rules (primarily in Regulation XIV) that specifically address TAC emissions. These SCAQMD rules have resulted in and will continue to result in substantial Basin-wide TAC emissions reductions. As such, cumulative TAC emissions during long-term operations would be less than significant. In addition, the project would not result in any sources of TACs that have been identified by Land Use Guidelines, and thus, would not contribute to a cumulative impact.

With respect to potential odor impacts, neither the proposed project nor any of the related projects (which are primarily general office, residential, retail, and restaurant uses) have a high potential to generate odor impacts.[25] Furthermore, any related project that may have a potential to generate objectionable odors would be required by SCAQMD Rule 402 (Nuisance) to implement BACT to limit potential objectionable odor impacts to a less than significant level. Thus, potential odor impacts from related projects are anticipated to be less than significant individually and cumulatively.

5. MITIGATION MEASURES

a. Construction

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

[24] *Calif. Health and Safety Code §§ 39650 et seq.*

[25] *According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.*

Mitigation Measure B-1: General contractors shall implement a fugitive dust control program pursuant to the provisions of SCAQMD Rule 403.[26]

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

Mitigation Measure B-3: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

Mitigation Measure B-4: Construction emissions should be phased and scheduled to avoid emissions peaks and discontinued during second-stage smog alerts.

Mitigation Measure B-5: Electricity from power poles rather than temporary diesel- or gasoline-powered generators shall be used, if power poles are available.

Mitigation Measure B-6: All construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site.

Mitigation Measure B-7: The Applicant shall utilize coatings and solvents that are consistent with applicable SCAQMD rules and regulations**.**

Mitigation Measure B-8: The Applicant shall moisten soil not more than 15 minutes prior to moving soil or conduct whatever watering is necessary to prevent visible dust emissions from exceeding 100 feet in any direction.

Mitigation Measure B-9: The Applicant shall apply non-toxic chemical stabilizers according to manufacturer's specifications to disturbed surface areas (completed grading areas) within five days of completing grading or apply non-toxic dust suppressants or vegetation sufficient to maintain a stabilized surface.

Mitigation Measure B-10: Exposed pits (i.e., gravel, soil dirt) with 5 percent or greater silt content shall be watered twice daily, enclosed, covered, or treated with non-toxic soil stabilizers according to manufacturer's specifications.

Mitigation Measure B-11: The Applicant shall water excavated soil and debris piles hourly or cover them with tarps, plastic sheets or other coverings.

Mitigation Measure B-12: The Applicant shall water exposed surfaces at least three times a day under calm conditions. Water as often as needed on windy days when winds are less than 25 miles per hour or during very dry weather in order to maintain a surface crust and prevent the release of visible emissions from the construction site.

Mitigation Measure B-13: All trucks hauling dirt, sand, soil or other loose materials off-site shall be covered or wetted or shall maintain at least two feet of freeboard (i.e., minimum vertical distance between the top of the material and the top of the truck). Wash mud-covered tires and under-carriages of trucks leaving construction sites.

Mitigation Measure B-14: The Applicant shall sweep adjacent streets, as needed, to remove dirt dropped by construction vehicles or mud that would otherwise be carried off by trucks departing the site.

[26] *SCAQMD Rule 403 requirements are detailed in Appendix C.*

Mitigation Measure B-15: The Applicant shall securely cover loads with a tight fitting tarp on any truck leaving the construction site.

Mitigation Measure B-16: The Applicant shall cease grading during periods when winds exceed 25 miles per hour.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

Implementation of the mitigation measures described above would reduce regional and local construction emissions for all pollutants. Further, as shown in **Table IV.B-9**, *Mitigated Proposed Project -Estimate of Construction Emissions*, the project with mitigation would not exceed thresholds for localized emissions or regional emissions for VOC, CO, or $PM_{2.5}$. However, after mitigation, the project would remain in exceedance of the SCAQMD regional significance thresholds for NO_x and PM_{10} during the most intense construction periods. As noted above, the analysis represents a worst case scenario, and the significant impacts would be less during the overall duration of construction than indicated for the maximum conditions. Notwithstanding, project construction would continue to result in a significant regional impact even with incorporation of all feasible mitigation measures.

Implementation of the mitigation measures described above would also reduce the localized NO_2 emissions at nearby sensitive receptors that were identified as contributing to a potentially significant impact in the dispersion modeling analysis. As shown in **Table IV.B-10**, *Mitigated Proposed Project – Localized Construction Dispersion Analysis*, the mitigated construction scenario would reduce the maximum off-site unmitigated annual and 1-hour NO2 concentrations, however emissions at the residential and school areas would continue to exceed the LST threshold and remain significant. As indicated, the maximum 1-hr and annual NO2 emissions would remain in exceedance of NAAQS and CAAQS even with mitigation. As a result, localized NO2 impacts would remain significant and unavoidable.

Actual construction activities would on average occur at a somewhat reduced level compared to the maximum predicted day and would have a corresponding reduction in pollutant emissions. Therefore, the modeled set of conservative assumptions likely overstates the potential localized impacts. However, the conclusion remains that project impacts during construction would be significant and unavoidable for regional NOx and $PM_{10,}$ localized 1-hour and annual NO_2 even with incorporation of all feasible mitigation measures. Cumulative impacts associated with construction of the project described above would also remain significant.

b. Operations

As indicated above, the project's impacts on air quality emissions due to project operations is less than significant, prior to mitigation. No mitigation measures are required.

Table IV.B-9

Mitigated Proposed Project -
Estimate of Construction Emissions [a]
(pounds per day)

Regional Emissions

	VOC	NOx	CO	SOx	PM_{10} [b]	$PM_{2.5}$ [b]
Individual Phases						
Grading/Debris Removal	14	123	70	<1	86	5
Concrete Pours Foundation	39	325	214	<1	328	13
Foundation	12	80	64	<1	41	2
Building Construction	34	101	89	<1	6	1
Emissions during Overlapping Phases [d]	**39**	**322**	**212**	**<1**	**328**	**13**
Maximum Regional Emissions	**39**	**325**	**214**	**<1**	**328**	**13**
Regional Significance Threshold	75	100	550	150	150	55
Over (Under)	(36)	225	(336)	(150)	178	(42)
Exceed Threshold?	**No**	**Yes**	**No**	**No**	**Yes**	**No**

Localized Emissions

	VOC	NOx	CO	SOx	PM_{10} [b]	$PM_{2.5}$ [b]
Individual Phases						
Grading/Debris Removal	10	78	43	<1	3	2
Concrete Pours Foundation	11	83	49	<1	1	1
Foundation	8	55	33	<1	<1	<1
Building Construction	32	95	69	<1	<1	<1
Emissions during Overlapping Phases [d]	**31**	**153**	**91**	**<1**	**3**	**2**
Maximum Localized Emissions	**32**	**153**	**91**	**<1**	**3**	**2**
SCAQMD Daily Significance Thresholds	-	164	815	-	6	4
Over (Under)	-	(11)	(724)	-	(3)	(2)
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

[a] *Emission quantities are rounded to "whole number" values. As such, the "total" values presented herein may be one unit more or less than actual values. Exact values (i.e., non-rounded) are provided in the URBEMIS model printout sheets and/or calculation worksheets that are presented in Appendix B.1.*

[b] *PM_{10} and $PM_{2.5}$ emissions estimates are based on compliance with SCAQMD Rule 403 requirements for fugitive dust suppression.*

[c] *The SCAQMD LSTs are based on Source Receptor Area 2 (Northwest Los Angeles County Coastal) for a two acre site with sensitive receptors located adjacent to the construction activity[d] Emissions during overlapping phases is assumed to potentially occur between non-continuous pour and building construction.*

Source: PCR Services Corporation, 2011.

Table IV.B-10

Mitigated Proposed Project –
Localized Construction Dispersion Analysis

Pollutant and Averaging Period[a]	Beverly Hills High School	Residential East
NO_2 (1-hr) – ug/m3)		
Project Incremental Concentration	160.4	121.5
LST Threshold	67.7	67.7
Over/(Under)	92.7	53.8
Exceed Threshold?	**Yes**	**Yes**
NO_2 (Annual) – ug/m3)		
Project Incremental Concentration	26.0	52.9
LST Threshold	18.80	18.80
Over/(Under)	7.2	34.1
Exceed Threshold?	**Yes**	**Yes**

[a] *All modeling runs assume maximum emissions from each phase are occurring simultaneously.*

Source: PCR Services Corporation, 2011.

IV. ENVIRONMENTAL IMPACT ANALYSIS
C. CULTURAL RESOURCES

1. INTRODUCTION

As described in the Initial Study prepared for the project and included as Appendix A, there are no structures currently located within the project site and the project would not impact historic resources in the project vicinity. Thus, the project would have a less than significant impact on historic resources. The following analysis of cultural resources addresses the potential for the proposed project to adversely impact archaeological and paleontological resources, as well as Native American resources (e.g., archaeological materials or burial sites). The analysis regarding archaeological resources is based on a records search conducted through the California Historical Resources Information System (CHRIS), South Central Coastal Information Center (SCCIC) at California State University Fullerton (CSUF). The analysis regarding paleontological resources is based on a records search commissioned through the Natural History Museum of Los Angeles County. The analysis regarding Native American resources is based on a Sacred Lands File (SLF) search commissioned through the Native American Heritage Commission (NAHC) with a follow-up consultation with a representative of the Gabrielino Tongva Indians of California Tribal.[1]

Archaeology is the recovery and study of material evidence of human life and culture of past ages. Over time, this material evidence becomes buried, fragmented or scattered, or otherwise hidden from view. It is not always evident from a field survey if archaeological resources exist within a project site. Thus, the possible presence of archaeological materials is also determined based upon secondary indicators, including the presence of geographic, vegetative, and rock features which are known or thought to be associated with early human life and culture, as well as knowledge of events or material evidence in the surrounding area.

Paleontology is a branch of geology that studies the life forms of the past through the study of plant and animal fossils. Paleontological resources represent a limited, non-renewable, and impact-sensitive scientific and educational resource. As defined in this section, paleontological resources are the fossilized remains or traces of multi-cellular invertebrate and vertebrate animals and multi-cellular plants, including their imprints from a previous geologic period. Fossil remains such as bones, teeth, shells, and leaves are found in the geologic deposits (rock formations) where they were originally buried. Paleontological resources include not only the actual fossil remains, but also the collecting localities, and the geologic formations containing those localities.

Native American resources are sites, areas, and materials important to Native Americans for religious, spiritual, or traditional reasons. These resources may include villages, burials, rock art, rock features, or spring locations. Fundamental to Native American religions is the belief in the sacred character of physical places, such as mountain peaks, springs, or burials. Traditional rituals may also prescribe the use of particular native plants, animals, or minerals that may be found in certain locations.

[1] *See Appendix C, Cultural Resources Assessment.. Information searches include: California Historical Resources Information System (CHRIS), South Central Coastal Information Center (SCCIC) at California State University Fullerton (CSUF), May 5, 2011; Natural History Museum of Los Angeles County, May 2011; Sacred Lands File (SLF) search Heritage Commission (NAHC), May 10, 2011. Follow-up consultation via phone conversation with Mr. Dorame was carried out on June 14, 2011. This conversation included review and confirmation of comments made regarding the project area by Mr. Dorame in 2008.*

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

Numerous laws and regulations require federal, State, and local agencies to consider the effects of a proposed project on cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies (e.g., State Historic Preservation Office and the Advisory Council on Historic Preservation). The National Historic Preservation Act (NHPA) of 1966, as amended; the California Environmental Quality Act (CEQA); and the California Register of Historical Resources (Public Resources Code [PRC] 5024), are the primary federal and State laws governing and affecting preservation of historic resources of national, State, regional, and local significance. Other relevant regulations at the local level include the City of Los Angeles Cultural Heritage Ordinance (Los Angeles Administrative Code, Section 22.130), the West Los Angeles Community Plan, and the Conservation Element of the City's General Plan. A description of the applicable laws and regulations is provided below.

(1) Federal Level

(a) Archaeological Resources

(i) National Register of Historic Places

First authorized by the Historic Sites Act of 1935, the National Register of Historic Places (National Register) was established by the NHPA of 1966, as "an authoritative guide to be used by federal, State, and local governments, private groups and citizens to identify the Nation's historic resources and to indicate what properties should be considered for protection from destruction or impairment."[2] The National Register recognizes properties that are significant at the national, State, and local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must meet one or more of the following four established criteria:[3]

A. Are associated with events that have made a significant contribution to the broad patterns of our history;

B. Are associated with the lives of persons significant in our past;

C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or

D. Have yielded, or may be likely to yield, information important in prehistory or history.

Unless the property possesses exceptional significance, it must be at least fifty years old to be eligible for National Register listing.[4]

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2 *Code of Federal Regulations (CFR), 36 Section 60.2.*

3 *U.S. Department of the Interior, National Park Service, National Register Bulletin: How to Apply the National Register Criteria for Evaluation).*

In addition to meeting the criteria of significance, a property must have integrity. Integrity is understood as "the ability of a property to convey its significance."[5] The National Register recognizes seven qualities that, in various combinations, define integrity. To retain historic integrity a property must possess several, and usually most, of these seven aspects. Thus, the retention of the specific aspects of integrity is paramount for a property to convey its significance.[6] The seven factors that define integrity are location, design, setting, materials, workmanship, feeling, and association.

(b) Paleontological Resources

Federal protection for significant paleontological resources would apply to the project if any construction or other related project impacts occurred on federal owned or managed lands. Federal legislative protection for paleontological resources stems from the Antiquities Act of 1906 (PL 59-209; 16 United States Code 431 et seq.; 34 Stat. 225), which calls for protection of historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest on federal lands. Because the proposed project is located on privately owned land, this federal statute is not applicable.

(2) State Level

(a) Archaeological Resources

The State implements the NHPA through its statewide comprehensive cultural resources surveys and preservation programs. The California Office of Historic Preservation (OHP), as an office of the California Department of Parks and Recreation, implements the policies of the NHPA on a statewide level. The OHP also maintains the California Historic Resources Inventory. The State Historic Preservation Officer is an appointed official who implements historic preservation programs within the State's jurisdictions.

(i) California Register of Historical Resources

Created by Assembly Bill 2881 which was signed into law on September 27, 1992, the California Register of Historical Resources (California Register) is "an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change."[7] The criteria for eligibility for the California Register are based upon National Register criteria.[8] Certain resources are determined by the statute to be automatically included in the California Register, including California properties formally determined eligible for, or listed in, the National Register of Historic Places.[9]

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4 *Exceptional Significance as defined by National Register Criteria Consideration G: Properties That Have Achieved Significance Within the Past Fifty Years. National Register Bulletin: How to Apply the National Register Criteria for Evaluation).*

5 *National Register Bulletin 15, p. 44.*

6 *Ibid.*

7 *California Public Resources Code Section 5024.1(a).*

8 *California Public Resources Code § 5024.1(b).*

9 *California Public Resources Code § 5024.1(d).*

To be eligible for the California Register, a prehistoric or historic property must be significant at the local, state, and/or federal level under one or more of the following criteria:

A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

B. Is associated with the lives of persons important in our past;

C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

D. Has yielded, or may be likely to yield, information important in prehistory or history.

A resource eligible for the California Register must meet one of the criteria of significance described above and retain enough of its historic character or appearance (integrity) to be recognizable as a historical resource and to convey the reason for its significance. It is possible that a historic resource may not retain sufficient integrity to meet the criteria for listing in the National Register, but it may still be eligible for listing in the California Register.

Additionally, the California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register of Historic Places and those formally Determined Eligible for the National Register of Historic Places;
- California Registered Historical Landmarks from No. 770 onward; and/or
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.
- Other resources that may be nominated to the California Register include:
- Historical resources with a significance rating of Category 3 through 5;10
- Individual historical resources;
- Historical resources contributing to historic districts; and/or
- Historical resources designated or listed as local landmarks, or designated under any local ordinance, such as an historic preservation overlay zone.

(ii) California Environmental Quality Act

CEQA is the principal statute governing environmental review of projects occurring in the State. CEQA requires lead agencies to determine if a proposed project would have a significant effect on archaeological resources (PRC Sections 21000 et seq.). As defined in Section 21083.2 of the PRC a "unique" archaeological

[10] *Those properties identified as eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, and/or a local jurisdiction register.*

resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

In addition, CEQA Section 15064.5 broadens the approach to CEQA by using the term "historical resource" instead of "unique archaeological resource." The CEQA Guidelines recognize that certain archaeological resources may also have significance. The CEQA Guidelines recognize that a historical resource includes: (1) a resource in the California Register of Historical Resources; (2) a resource included in a local register of historical resources, as defined in PRC §5020.1 (k) or identified as significant in a historical resource survey meeting the requirements of PRC §5024.1 (g); and (3) any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California by the lead agency, provided the lead agency's determination is supported by substantial evidence in light of the whole record.

If a lead agency determines that an archaeological site is a historical resource, the provisions of §21084.1 of the PRC and §15064.5 of the CEQA Guidelines apply. If an archaeological site does not meet the criteria for a historical resource contained in the CEQA Guidelines, then the site is to be treated in accordance with the provisions of PRC §21083.2, which refer to a unique archaeological resource. The CEQA Guidelines note that if an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. (Guidelines §15064.5(c)(4)).

(b) Paleontological Resources

Paleontological resources are also afforded protection by environmental legislation set forth under CEQA. Appendix G of the CEQA Guidelines provides guidance relative to significant impacts on paleontological resources, stating that "a project will normally result in a significant impact on the environment if it will … disrupt or adversely affect a paleontological resource or site or unique geologic feature, except as part of a scientific study." Section 5097.5 of the PRC specifies that any unauthorized removal of paleontological remains is a misdemeanor. Further, the California Penal Code Section 622.5 sets the penalties for damage or removal of paleontological resources.

(c) Native American Resources

The Native American Heritage Commission (NAHC) is the state agency designated to protect California's Native American Cultural Resources. To adequately assess the project-related impacts on historical resources, the NAHC recommends that CHRIS be contacted for possible 'recorded sites' in locations where the development will or might occur. The Commission also recommends that a Sacred Lands File (SLF)

search of the project area and information on tribal contacts in the project vicinity be conducted that may have additional cultural resource information. The SLF search also recommends follow-up contact with Native American groups and/or individuals identified by the NAHC as having affiliation with the project vicinity. Results of the SLF search and follow-up contact provide information as to whether there are any locations in the vicinity of the project site that are culturally sensitive to Native Americans. Native American burials in California are protected by several statutes from the California PRC Chapter 1.75 Section 5097.9 – 5097.991 and Section 7050 of the Health and Safety Code.

(3) Local Level

(a) Archaeological Resources

The City of Los Angeles enacted a Cultural Heritage Ordinance in 1962, and amended in 1985, which created the City's Cultural Heritage Commission and criteria for the designation of Historic-Cultural Monuments (LAHCMs). According to the ordinance, LAHCMs are any sites (including significant trees or other plant-life located thereon), buildings, or structures of particular historic or cultural significance to the City of Los Angeles in which the broad cultural, economic, political, or social history of the nation, state, or city is reflected or exemplified. LAHCMs are regulated by the City's Cultural Heritage Commission, which reviews permits to alter, relocate, or demolish these landmarks.

The City's Cultural Heritage Ordinance (Section 22.120, et seq. of the City of Los Angeles Administrative Code) establishes criteria for designating local historic resources as LAHCMs. The City's criteria are sufficiently broad enough to include a wide variety of historic resources, including archaeological sites. However, a proposed resource should possess sufficient architectural, historical, and/or cultural significance to warrant designation. Though there is no age requirement for designation as a LAHCM, sufficient time to develop an accurate historical perspective and to evaluate its significance in context should be considered. A LAHCM must satisfy one or more of the City's criteria, which are defined as the following:

- It reflects or exemplifies the broad cultural, political, economic, or social history of the nation, state, city or community;
- It is identified with historic personages or with important events in the main currents of national, state, or local history;
- It embodies the distinguishing characteristics of an architectural type, specimen, inherently valuable for a study of a period style or method of construction; and/or
- It is a notable work of a master builder, designer, or architect whose individual genius influenced his age.

The West Los Angeles Community Plan also includes the following objective that relates to the preservation of cultural resources:

- *Objective 17-1* To ensure that the community's historically significant resources are protected, preserved, and/or enhanced.

(b) Paleontological Resources

The City of Los Angeles Conservation Element, Chapter II, Section 3, states that the City has a primary responsibility to protect paleontological sites pursuant to CEQA. As such, the City's policy is to identify and protect significant paleontological sites and/or resources known to exist or identified during land development, demolition or property modification activities. If land development occurs within a potentially significant paleontological area, "the developer is required to contact a bona fide paleontologist to arrange for assessment of the potential impact and mitigation of potential disruption of or damage to the site." If significant resources are discovered, authorities must be notified and the designated paleontologist may cease construction activity in that portion of the project site. This cessation allows time for the assessment, removal or protection of the paleontological resources.[11]

b. Existing Conditions

The project site is currently vacant and has been graded and enclosed with construction fencing. The project site was previously occupied by office and restaurant uses, totaling approximately 130,500 square feet and a separate above-ground parking structure.

The project site and surrounding area are relatively flat. From the northwest corner to the southeast corner of the project site, the elevation varies by approximately 15 feet.[12] Due to the previous site development and demolition, the surficial native soils were removed leaving a layer of fill material lying below the surrounding/original land elevations. The project site is underlain by Quaternary Age Older Alluvium overlain by variable amounts of fill. The fill on the project site is typically about 7.5 feet deep but varies from 5 feet to as deep as 13 feet in the southeast corner of the project site.. Identification of the alluvium is essential because it is the indication of the original ground surface on-site prior to development, and is the only geological unit on-site that would likely contain intact prehistoric cultural remains. Groundwater at the project site ranges from 35 to 50 feet below ground surface.

(1) Archaeological Resources

A records search was conducted through the SCCIC at CSUF to identify previously documented prehistoric and historic archaeological resources on the project site and surrounding area. A review of survey data collected and evaluated indicates that no prehistoric or historic archaeological sites have been recorded on the project site and no unique or important prehistoric or historic archaeological resources have been encountered in the project vicinity. Nine studies assessing archaeological resources have been conducted within a one-half mile of the project site. Of these studies, three included a surface survey for archaeological resources. One archaeological monitoring study was conducted just over one-half mile to the southwest of the project site. This study identified remains of the Twentieth Century Fox Film Corporation Studios dating between 1924 to 1935 at depths as deep as 20 feet below the modern ground surface.[13]

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[11] *City of Los Angeles Conservation Element, Section 3, adopted September 2001.*

[12] *Feffer Geological Consulting, Geotechnical Investigation, New Construction, 10000 Santa Monica Boulevard.*

[13] *Strudwick, I., J. Michalsky, and G. King, 1998. Archaeological Site Record for CA-LAN-2479H. Document on file at the California Historical Resources Information System South Central Coastal Information Center at California State University, Fullerton.*

(2) Paleontological Resources

A records search was commissioned through the Natural History Museum of Los Angeles County to identify previously documented paleontological resources on the project site and surrounding area. Results of the records search indicate that no vertebrate fossil localities have been recorded within the project site, but localities have been recorded in the vicinity in the same sedimentary deposits that underlie the project site.[14] The project site has surficial deposits consisting of older Quaternary Alluvium derived primarily as fan deposits from the Santa Monica Mountains to the north and as fluvial deposits from the nearby drainage. The nearest vertebrate fossil locality in the Quaternary Alluvium, LACM 5501, is located south of the project site, south of Olympic Boulevard between Avenue of the Stars and Century Park East. This vertebrate fossil locality produced fossil specimens of pond turtle (*Clemmys marmorata*), dog (*Canis*), and horse (*Equus*) at a shallow but unspecified depth. Northeast of the project site, near the intersection of Wilshire Boulevard and Bedford Drive, there are two vertebrate fossil localities, LACM 3355 and LACM 3821, that produced specimens of fossil horse (*Equus*) and even-toed ungulates (*Artiodactyla*) both at a depth of 40 feet below the surface. Locality LACM 5833, west of the project site, just south of Wilshire Boulevard between Thayer and Westholme Avenues, produced fossils of horse (*Equus*), kangaroo rat (*Dipodomys*), wood rat (*Neotoma*), meadow vole (*Microtus*), and pocket gopher (*Thomomys*) at shallow but unspecified depths. Localities farther away in the older Quaternary sediments have also produced fossil specimens typical of the fauna from the Rancho La Brea asphalt deposits approximately 2.5 miles east of the project site.

(3) Native American Resources

The project site lies within the ethnographic territory of the Native American group known as the Gabrielino. Gabrielino territory included the Los Angeles Basin, the coast of Aliso Creek in Orange County to the south to Topanga Canyon in the north, the four southern Channel Islands, and watersheds of the Los Angeles, San Gabriel, and Santa Ana Rivers. Their name is derived from their association with Mission San Gabriel Archangel.

The Gabrielino were not the first inhabitants of the Los Angeles Basin, but arrived around 500 B.C. The Gabrielino are descendants of the Shoshonean migration, which originated out of the Great Basin and displaced the already established Hokan speakers. The Gabrielino were advanced in their culture, social organization, religious beliefs, and art and material production. Class differentiation, inherited chieftainship, and intervillage alliances were all components of Gabrielino society. At the time of European contact, the Gabrielino were actively involved in trade using shell and beads as currency. The Gabrielino were known for excellent artisanship in the form of pipes, ornaments, cooking implements, inlay work, and basketry. The Gabrielinos evolved an effective economic system which managed food reserves (storage and processing), exchanged goods, and distributed resources.

A SLF search was commissioned through the NAHC to identify potential Native American resources (e.g., archaeological materials or burial sites) on the project site and surrounding area. No known traditional burial sites or other type of cemetery usage has been identified within the project site. However, the NAHC did indicate the presence of Native American cultural resources in the project vicinity.[15] The follow-up

[14] *"Paleontological Records Search for the Proposed SunCal Redevelopment Project, in Century City, Los Angeles County," January 25, 2008, by Samuel A. McLeod, Ph.D., Natural History Museum of Los Angeles County for PCR Services Corporation.*

[15] *Dave Singleton, Program Analyst, Native American Heritage Commission (NAHC), letter correspondence dated January 28, 2008.*

consultation recommended by the NAHC was conducted, including follow-up with a representative of the Gabrielino Tongva Indians of California Tribal Council located in Culver City, California.

When contacted by phone on June 14, 2011, Mr. Robert Dorame, the tribal representative, supported earlier assessments regarding the project site that tribal and oral history indicate the vicinity of Century City along Santa Monica Boulevard is sensitive for cultural resources. He also noted that Native American burials had been identified along the "older route of the railroad". Furthermore, Mr. Dorame reported the existence of natural springs that the tribe used prehistorically in the vicinity of the project site. Consequently, he indicated that Native American cultural resources may be present within the project site at depth.

3. PROJECT IMPACTS

a. Methodology

(1) Archaeological Resources

A records search was conducted through the SCCIC at CSUF to identify whether or not archaeological resources have been made on the project site itself or within the surrounding area. The records search included a review of all previously recorded historic and prehistoric resources within the project site and surrounding area, as well as a review of all known cultural resource survey and excavation reports. In addition, historic maps, the California State Historic Resources Inventory, the National Register of Historic Places, the listing of California Historical Landmarks, and the California Points of Interest were reviewed. Given that the site is fully disturbed, no archaeological field survey was undertaken.

(2) Paleontological Resources

To develop a baseline paleontological resources inventory of the project site and surrounding area and to assess the potential paleontological productivity of each stratigraphic unit present, the published and available unpublished geological and paleontological literature was reviewed; and stratigraphic and paleontologic inventories were compiled, synthesized, and evaluated by the staff of the National History Museum of Los Angeles County.

(3) Native American Resources

A SLF search was commissioned through the NAHC to identify potential Native American resources (e.g., archaeological materials or burial sites) on the project site and surrounding area. The NAHC indicated the presence of Native American cultural resources in the project vicinity. PCR conducted follow-up consultation recommended by the NAHC, including follow-up with a representative of the Gabrielino Tongva Indians of California Tribal Council located in Culver City, California.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts with regard to archaeological and paleontological resources. These questions are as follows:

Would the project:

- Cause a substantial adverse change in the significance of a unique archaeological resource pursuant to Section 15064.5?

- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- Disturb any human remains, including those interred outside of formal cemeteries

(1) Archeological Resources

In the context of these questions from Appendix G of the CEQA Guidelines, the *City of L.A. CEQA Thresholds Guide (2006*) states that a project would normally have a significant impact upon archaeological resources if it could disturb, damage, or degrade an archaeological resource or its setting is found to be important under the criteria of CEQA because it:

- Is associated with an event or person of recognized importance in California or American prehistory or of recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable archaeological research questions;
- Has a special or particular quality, such as the oldest, best, largest, or last surviving example of its kind;
- Is at least 100 years old and possesses substantial stratigraphic integrity; or
- Involves important research questions that historical research has shown can be answered only with archaeological methods.

Based on these factors, the proposed project would have a significant impact on archaeological resources if:

CR-1 Project activities would disturb, damage, or degrade a unique archaeological resource or an archaeological historic resource, or setting of the resource.

(2) Paleontological Resources

With regard to paleontological resources, *City of L.A. CEQA Thresholds Guide (2006)* states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a paleontological resource; and
- Whether the paleontological resource is of regional or statewide significance.

Based on these factors, the project would have a significant impact on paleontological resources, if:

CR-2 The project would result in the permanent loss of, or loss of access to, a paleontological resource of regional or statewide significance.

c. Analysis of Project Impacts

Implementation of the proposed project would require modification to the existing subsurface to accommodate the project's lowest level partially-subterranean parking and building foundations. The required excavation would encroach to approximately 10 feet below the existing grade; with possible drilling to 50 feet if piles are used for the project foundations. Approximately 40,000 cubic yards of soil would be

excavated. Potential impacts of the project on Cultural Resources would be the same for both the Conventional Parking Alternative and Automated Parking Alternative since both options requiring similar excavation. As such, the following analysis addresses the impacts of both project options.

(1) Archaeological Resources

The project site is located within a highly urbanized area, and the entire site has been subject to disruption over the years. The project site has recently been graded and excavated. Thus, surficial archaeological resources that may have existed at one time have likely been previously disturbed. Nevertheless, the project proposes excavation of the project site which would extend beyond the fill material (typically about 7.5 feet deep, but as shallow as 5 feet deep) that covers the majority of the project site, thus encountering the underlying Quaternary Age Older Alluvium. While discovery of archaeological remains in the fill deposits on the project site are unlikely, excavation occurring below the fill levels could potentially encounter archaeological remains. Therefore, Mitigation Measure C-1 below is recommended to reduce the potential impact of the proposed project on archaeological resources to a less than significant level.

(2) Paleontological Resources

Based on the paleontological records search, there are no vertebrate fossil localities that lie directly within the proposed project area. However, there are fossil localities nearby from the same Quaternary Alluvium sedimentary deposits that occur in the proposed project area. The closest vertebrate fossil locality is located east of due south of the project site south of Olympic Boulevard between Avenue of the Stars and Century Park East. This locality produced fossil specimens of pond turtle, dog, and horse as shallow but unstated depth.

As stated previously, fill below the project site varies, typically at about 7.5 feet of depth but as shallow 5 feet . Because the project proposes excavation into older Quaternary Alluvium sediments, excavations within the project site may encounter vertebrate fossils. Therefore, Mitigation Measure C-2 below is recommended to reduce the potential impact of the proposed project on paleontological resources to a less than significant level.

(3) Native American Resources

When interviewed in a follow-up consultation, Mr. Robert Dorame, a representative of the Gabrielino Tongva Indians of California Tribal Council, noted the vicinity of Century City along Santa Monica Boulevard is sensitive for cultural resources. He also noted that Native American burials had recently been identified along the “older route of the railroad”. Furthermore, Mr. Dorame indicated the existence of natural springs that the tribe used prehistorically in the vicinity of the project site.[16] The West Los Angeles Community Plan also notes that the Tongva or Serra Springs is located at University High School, approximately 2.8 miles southwest of the project site. This site is listed as California Historical Landmark No. 522. This landmark is associated with Explorer Gaspar de Portola who camped at a village on the site known as Kuruvungna, meaning "a place in the sun," in 1769, traveling the route that became known as the Camino Real. Construction of University High School in 1925 unearthed evidence of an Indian Village at this site. In addition, the spring was also the former water supply for the town of Santa Monica. It received its names

[16] *Telecommunication interview by PCR with Mr. Robert Dorame, a representative of the Gabrielino Tongva Indians of California Tribal Council, on June 14, 2011.*

from the Tongva Indians who occupied the site, and from Father Junipero Sera who is believed to have said mass there. Due to the distance of the project site and intervening development, including the I-405 Freeway, the proposed project would have no impact on this resource.

Although the project site has been graded and disrupted over the years, the proposed project would require excavation into native soils. Therefore, there may be a potential for the discovery of Native American cultural resources during excavation into previously undisturbed sediments. Mitigation Measure C-1 below is recommended to ensure identification of Native American cultural resources that might be encountered. If human remains are found, Mitigation Measure C-3 is recommended to ensure the potential impact of the proposed project on Native American remains is less than significant.

4. CUMULATIVE IMPACTS

Section III, General Description of Environmental Setting, of this Draft EIR identifies 40 related projects in the vicinity of the project site. Of these 40 projects, 9 are located within half a mile radius of the project site.

Cumulative impacts associated with archaeological resources would be less than significant since, like the proposed project, each of the related projects would be required to comply with the regulations cited above in the event that archaeological resources are found including PRC Section 21083.2 or PRC Section 21084.1 and CEQA Guidelines Section 15064.5. In addition, with regard to paleontological and Native American resources, as described below, with implementation of the proposed mitigation measures, project impacts would be less than significant. It would also be expected that other related projects would implement such mitigation measures on a case-by-case basis if deemed appropriate as part of their environmental review. Thus, cumulative impacts associated with paleontological and Native American resources would also be less than significant.

5. MITIGATION MEASURES

a. Archaeological Resources

Mitigation Measure C-1: A qualified archaeologist shall be retained by the Applicant to review grading plans and geotechnical information and prepare a monitoring plan for all ground-disturbing activities in previously undisturbed sediments. A qualified archaeologist is defined as an archaeologist meeting the Secretary of the Interior Professional Qualification Standards for Archaeology. Ground-disturbing activities include primary construction-related activities and any associated secondary activities for support services such as utilities. In the event that archaeological resources are identified during monitoring or unexpectedly during excavations in fill sediments, all work proximal to the discovery shall halt until the qualified archaeologist has evaluated the find. If the archaeologist determines that the find is significant or may qualify as significant, the archaeologist shall prepare a treatment plan. If the find is prehistoric or includes Native American materials, affiliated Native American groups shall be invited to contribute to the treatment plan. Results of monitoring and any archaeological treatment shall be reported in an appropriate technical report to be filed with the Applicant, the City, and the California Historical Resources Information System (CHRIS). The Applicant, in consultation with the Lead Agency and Archaeologist, shall designate repositories in the event that resources are recovered.

b. Paleontological Resources

Mitigation Measure C-2: A qualified paleontologist shall be retained by the Applicant to perform periodic inspections of excavation and grading activities on the project site where excavations into the older Quaternary Alluvium may occur. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. If a potential fossil is found, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation and, if necessary, salvage. At the paleontologist's discretion and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock samples for initial processing. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are donated to their final repository. Accompanying notes, maps, and photographs shall also be filed at the repository. Following the completion of the above tasks, the paleontologist shall prepare a report summarizing the results of the monitoring and fossil finds, if any, the methods used in these efforts, as well as a description of the fossils collected and their significance, if any. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies.

c. Native American Resources

Mitigation Measure C-3: If human remains are unearthed during construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the County Coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent of the deceased Native American, who shall then help determine what course of action shall be taken in dealing with the remains. The Applicant shall then take additional steps as necessary in accordance with CEQA Guidelines Section 15064.5(e) and Assembly Bill 2641.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of the mitigation measures outlined above, potential impacts to archaeological and paleontological resources, as well as Native American resources would be reduced to a less than significant level.

IV. ENVIRONMENTAL IMPACT ANALYSIS
D. GEOLOGY

1. INTRODUCTION

This section evaluates potential geologic and soils hazards associated with the proposed project including fault rupture, ground shaking, liquefaction, expansive soils, and landform/landslide. A related issue, erosion, is addressed in Section IV.G, Hydrology and Water Quality, of this Draft EIR. This section is largely based on information and findings gathered for a Geotechnical Investigation prepared by Feffer Geological Consulting, included as Appendix D to the Draft EIR.[1]

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) State of California

(a) Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Earthquake Fault Zoning Act (Public Resources Code Section 2621) was enacted by the State of California in 1972 to address the hazard of surface faulting to structures for human occupancy.[2] The Alquist-Priolo Earthquake Fault Zoning Act was a direct result of the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged homes, commercial buildings, and other structures. The primary purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prevent the construction of buildings intended for human occupancy on the surface traces of active faults. The Alquist-Priolo Earthquake Fault Zoning Act is also intended to provide the citizens with increased safety and to minimize the loss of life during and immediately following earthquakes by facilitating seismic retrofitting to strengthen buildings against ground shaking. The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones, known as "earthquake fault zones", around the surface traces of active faults and to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. Maps are distributed to all affected cities and counties for the controlling of new or renewed construction and are required to sufficiently define potential surface rupture or fault creep. The State Geologist is charged with continually reviewing new geologic and seismic data, and revising existing zones and delineating additional earthquake fault zones when warranted by new information. Local agencies must enforce the Alquist-Priolo Earthquake Fault Zoning Act in the development permit process, where applicable, and may be more restrictive than State law requires. According to the Alquist-Priolo Earthquake Fault Zoning Act, before a project that is within an earthquake fault zone can be permitted, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to demonstrate that buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back. Although setback distances may vary, a minimum 50-foot setback is required. The Alquist-Priolo Earthquake Fault Zoning Act and its

[1] *Geotechnical Investigation, New Construction 10000 Santa Monica Boulevard, Los Angeles, California,Feffer Geological Consulting, Joshua R. Feffer and Jon A. Irvine, June 8, 2011.*

[2] *The Act was originally entitled the Alquist-Priolo Geologic Hazards Zone Act.*

regulations are presented in California Department of Conservation, California Geological Survey, Special Publications (SP) 42, Fault-rupture Hazard Zones in California.

(b) Seismic Hazards Mapping Act

In order to address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990 (Public Resources Code Section 2690-2699). Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the project site are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under Public Resources Code Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval. Under Public Resources Code Section 2698, nothing is intended to prevent cities and counties from establishing policies and criteria which are stricter than those established by the Mining and Geology Board.

State publications supporting the requirements of the Seismic Hazards Mapping Act include the California Geological Survey SP 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California and SP 118, Recommended Criteria for Delineating Seismic Hazard Zones in California. The objectives of SP 117 are to assist in the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations and to promote uniform and effective statewide implementation of the evaluation and mitigation elements of the Seismic Hazards Mapping Act. SP 118 implements the requirements of the Seismic Hazards Mapping Act in the production of Probabilistic Seismic Hazard Maps for the State.

(c) California Building Code

The California Building Code, Title 24 of the California Code of Regulations, is a compilation of building standards, including seismic safety standards for new buildings. California Building Code standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. Given the State's susceptibility to seismic events, the seismic standards within the California Building Code are among the strictest in the world. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies. California adopted the 2010 California Building Code, which became effective on January 1, 2011. Specific California Building Code building and seismic safety regulations have been incorporated by reference in the Los Angeles Municipal Code with local amendments.

(2) City of Los Angeles

(a) Los Angeles General Plan Safety Element

The City's General Plan Safety Element, which was adopted in 1996, addresses public safety risks due to natural disasters including seismic events and geologic conditions, as well as sets forth guidance for

emergency response during such disasters. The Safety Element also provides maps of designated areas within the City that are considered susceptible to earthquake-induced hazards, such as fault rupture and liquefaction. Notwithstanding, the Department of Building and Safety maintains more detailed mapping than the generalized maps in the Safety Element. These hazards further are discussed below.

(b) Los Angeles Municipal Code

Earthwork activities, including grading, are governed by the Los Angeles Building Code, which is contained in Los Angeles Municipal Code, Chapter IX, Article 1. Specifically, Section 91.7006.7 includes requirements regarding import and export of material; Section 91.7010 includes regulations pertaining to excavations; Section 91.7011 includes requirements for fill materials; Section 91.7013 includes regulations pertaining to erosion control and drainage devices; Section 91.7014 includes general construction requirements as well as requirements regarding flood and mudflow protection; and Section 91.7016 includes regulations for areas that are subject to slides and unstable soils. Additionally, the Los Angeles Building Code includes specific requirements addressing seismic design, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. The Los Angeles Building Code incorporates by reference the California Building Code, with City amendments for additional requirements. The City Department of Building and Safety is responsible for implementing the provisions of the Los Angeles Building Code.

b. Existing Conditions

(1) Regional Geology

The site is located within the northernmost portion of the geologic area known as the Los Angeles Basin (Basin). The Basin is a coastal plain between the Santa Monica Mountains to the north, the Puente Hills and Whittier faults to the east, the Palos Verdes Peninsula and the Pacific Ocean to the west, and the Santa Ana Mountains and San Joaquin Hills to the south. The Basin is located in the northern portion of the Peninsular Ranges geomorphic province and is a northwest-trending alluvial lowland plain, sometimes called the Coastal Plain of Los Angeles. The Basin is underlain by a deep structural depression, which has been filled by both marine and continental sedimentary deposits, which rest on a basement complex of igneous and metamorphic composition. The basement surface within the central portion of the Basin extends to a maximum depth of 32,000 feet below sea level. The prominent structural features within the Basin include the central lowland plain, the uplifted Palos Verdes Hills, and the northwest trending line of low hills and mesas (underlain by the Newport-Inglewood Fault Zone).

Within the Basin, Pleistocene and Holocene Age alluvial deposits are underlain by marine and continental sediments. Locally, the Pleistocene Age Lakewood Formation is an aquifer at depth.[3],[4] These deposits generally consist of fine- to coarse-grained poorly graded sand with silt, silty sand, sandy silt and silt with varied amounts of gravel. The soils are primarily slightly moist to moist and medium dense to very dense or firm too hard, and become denser with increased depth.

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

[4] *"Planned Utilization of Ground Water Basins of the Coastal Plain of Los Angeles County," California Department of Water Resources, 1961, Appendix A, Ground Water Geology, Bulletin No. 104.*

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

At the local level, the project site is located just north of Beverly Hills High School at the southwest corner of Moreno Drive and Santa Monica Boulevard. The site is currently vacant and was previously occupied by an office building. Santa Monica Boulevard descends gently to the east and Moreno Drive descends to the south. From the northwest corner to the southeast corner of the property, the site elevation varies by 15 feet.

(2) Geologic Hazards

(a) Fault Rupture

Fault rupture is defined as the displacement that occurs along the surface of a fault during an earthquake. Based on criteria established by the California Geological Survey, faults can be classified as active, potentially active, or inactive.[5] Active faults are those that have shown evidence of movement within the past 11,000 years (i.e., Holocene). Potentially active faults are those that have shown evidence of movement between 11,000 and 1.6 million years ago (i.e., Pleistocene). Inactive faults are those that have not exhibited displacement younger than 1.6 million years before the present. Additionally, there are blind thrust faults, which are low angle reverse faults with no surface exposure. Due to their buried nature, the existence of blind thrust faults is usually not known until they produce an earthquake.

The City of Los Angeles General Plan Safety Element designates fault rupture study areas extending along each side of active and potentially active faults to establish areas of hazard potential due to fault rupture. The project site is located within a City-designated fault rupture study area.[6]

The seismically active region of Southern California is crossed by numerous active and potentially active faults and is underlain by several blind thrust faults. The proposed project site is located within a seismically active area, as is all of Southern California.

The closest known active faults to the site are the Newport-Inglewood and Santa Monica Faults. The Santa Monica Fault is located to the north of Santa Monica Boulevard within the golf course property about 0.25 km north of the site. The Newport-Inglewood Fault as located on state of California Special Studies Zone Earthquake Fault Maps is 4 km to the southeast of the site. The Santa Monica Fault is not zoned as an active Fault on the State of California Alquist-Priolo maps but several studies indicate that it is likely active and will likely soon be officially designated as an active fault. The Santa Monica Fault does not cross the subject property. Since no active faults cross the property, the surface rupture hazard at the site is essentially non-existent. Although there are no known active faults on the site, earthquakes generated from large regional

[5] *The California Geological Survey was formerly called the California Division of Mines and Geology (CDMG).*

[6] *City of Los Angeles General Plan Safety Element, Exhibit A, adopted by the City Council, November 26, 1996.*

faults, such as the San Andreas, Santa Monica-Hollywood, Verdugo, Newport-Inglewood and Raymond Faults, could affect the site.

The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish earthquake fault zones around the surface traces of active faults and to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. These zones, which generally extend from 200 to 500 feet on each side of the known active fault, identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. To date, no active faults have been found on the subject site; and the project site is not located within an Alquist-Priolo Earthquake Fault zone.

Ongoing evaluation of fault hazard within the area surrounding the subject site is being performed by Metro in conjunction with the environmental analyses for the Metro Rail Westside Subway Extension (Purple Line)[7] The Metro Rail information, once released, will be incorporated into the final Geotechnical Investigation prepared for the proposed project.

(b) Ground Shaking

The project site is not located within a State-designated Alquist-Priolo Earthquake Fault Zone. However, the site is located within a City-designated fault rupture study area and is located in the seismically active region of southern California. Peak Ground Accelerations (PGA) at the site for the Maximum Considered Earthquake is estimated to be 0.5g.

(c) Liquefaction

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials.

The Seismic Hazards Mapping Act requires the State Geologist to delineate seismic hazard zones in areas where the potential for strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events are likely to occur. Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the project site are investigated and appropriate mitigation measures, if any, are incorporated into development plans. Based on the seismic hazard zone maps prepared by the California Geologic Survey for the Beverly Hills Quadrangle, the project site is not located within a State-designated liquefaction zone of required investigation.[8] [9] The site is located within an area of potential liquefaction on the City of Los Angeles Safety Element maps.

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[7] *Based on discussions between Feffer Geological Consulting and MACTEC Engineering and Consulting, Inc., the geotechnical firm performing the geotechnical services for the Metro project.*

[8] *Geotechnical Investigation, Feffer Geological Consulting, JoshuaR. Feffer and Jon A. Irvine.*

(3) Subsurface Soils

Subsurface materials at the site consist of Quaternary Age Older Alluvium below variable amounts of fill. The fill consists of fine to coarse-grained silty and gravelly sand with minor amounts of clay and occasional concrete fragments. The color consists of mottled light brown to brown, tan, orange and green. The fill is medium dense, moist and contains occasional construction spoils. The fill on site is typically approximately 7.5 feet deep, but it varies from five feet to as deep as 13 feet in the southeast corner of the site. The alluvium consists of admixtures of gravel, sands, silts, and clays which vary from light to dark browns, grays, tan greenish-gray, orange-brown, and occasional red-brown. The alluvium was moist (saturated below the ground water level), medium dense to dense, firm to stiff, containing caliche and mica. The alluvium is generally weakly horizontally layered with no significant structural planes. The alluvium at the subject site is competent and not subject to liquefaction or earthquake induced ground deformation[10]

(a) Expansive Soils

Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Changes in soil moisture content can result from rainfall, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may cause unacceptable settlement or heave of structures, concrete slabs-on-grade, or pavements supported over these materials. Depending on the extent and location below finished subgrade, expansive soils could have a detrimental effect on proposed construction. At the proposed project site, near-surface soil was found to possess low to moderate expansive characteristics based upon expansion index testing and field soil classifications.[11]

(b) Settlement

As described in the Project's Geotechnical Investigation, consolidation and hydrocollapse potential of the older alluvium at the depth of the proposed subterranean garage is low to moderate.

(c) Landform

The project site and surrounding area are relatively flat with no pronounced highs or lows. No distinct or prominent geologic or topographic features are located on the project site such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands.

3. ENVIRONMENTAL IMPACTS

a. Methodology

This analysis of impacts associated with geology and soils is based on the Geotechnical Investigation currently being prepared by Feffer Geological Consulting. The Geotechnical Investigation included field exploration (i.e., exploratory soil borings) and laboratory testing to determine the characteristics of the

[9] *City of Los Angeles General Plan Safety Element, Exhibit B, adopted by the City Council, November 26, 1996.*

[10] *Geotechnical Investigation, Feffer Geological Consulting, JoshuaR. Feffer and JonA. Irvine.*

[11] *Ibid.*

subsurface conditions at the project site. These subsurface conditions were then analyzed to determine their ability to support the site excavation and project development. Project construction procedures and guidelines for building engineering that would the project to be developed safely pursuant to regulations and standard design practices were identified. Recommendations regarding the design and construction of the proposed project are based on these results.

b. Threshold of Significance

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts with regard to geology and soils. These questions are as follows:

Would the project:

- Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
    - Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area based on other substantial evidence of a known fault;
    - Strong seismic ground shaking;
    - Seismic-related ground failure, including liquefaction; or
    - Landslides?
- Result in substantial soil erosion or the loss of topsoil?
- Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?
- Be located on expansive soils, as defined by Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
- Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

In the context of these questions from the CEQA Guidelines, the City of Los Angeles' CEQA Thresholds Guide (2006) states that a project would normally have a significant geologic hazard impact if it would:

(1) Geologic Hazards

GS-1 Cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

(2) Sedimentation and Erosion

GS-2 Constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or

GS-3 Accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

(3) Landform Alteration

GS-4 One or more distinct and prominent geologic or topographic features would be destroyed, permanently covered, or materially and adversely modified as a result of the project. Such features may include, but are not limited to, hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, and wetlands.

c. Project Design Features

Construction activities would consist of excavation for the project's one partially subterranean parking level, and the provision of appropriate foundations for the project buildings. Excavation of approximately 40,000 cubic yards of soil with export of approximately 11,000 cubic yards of soil, would be required. Activities associated with the grading and export of soil would occur in accordance with City requirements, as specified in the Los Angeles Municipal Code and through the grading plan review and the approval process.

Project development would include development of a 39-story, residential tower with 283 residential units, and a 90-foot ancillary building with approximately 280,467 square feet of parking, with supporting recreation and open space uses. All development would be provided pursuant to appropriate codes and regulations, including the City of Los Angeles Building Code as well regulations of the Department of Building and Safety and the Bureau of Engineering.

d. Analysis of Project Impacts

Impacts of the proposed project with regard to geology and soils would be the same for the Conventional Parking Option and the Automated Parking Option. Both would include similar excavation and require similar foundations for their buildings Therefore, the discussion of project impacts below is applicable to implementation of the project with both parking options.

The following discussion addresses the project's potential impacts with regard to the following geology/soil issues: fault rupture, ground shaking, liquefaction, settlement, expansive soil, landform/landslide and site stability. Each of these potential project impacts is discussed individually below.

(1) Geologic Hazards

(a) Fault Rupture

No known active or potentially active faults underlie the project site, and the project site is not located within a State-designated earthquake fault zone. Thus, the potential for surface ground rupture at the project site is considered low. Based on current information, development of the proposed project would not result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury involving rupture of a known earthquake fault. Impacts regarding fault rupture would be less than significant, and no mitigation measures would be necessary.

The project site is located within a City-designated fault rupture study area, and is subject to further study. Metro is currently conducting on-going studies regarding fault conditions in the project area. The additional information from such on-going fault hazard analyses will be reviewed and considered in the final

Geotechnical Investigation for the proposed project. Mitigation Measure D-1, below provides for preparation of a final Geotechnical Investigation to the Department of Building and Safety.

(b) Ground Shaking/Seismicity

The project site is located within the seismically active region of southern California. The level of ground shaking that would be experienced at the project site from active, potentially active faults or blind thrust faults in the region would be a function of several factors including earthquake magnitude, type of faulting, rupture propagation path, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology. The closest known potentially active faults to the site are the Santa Monica-Hollywood, Malibu Coast, and Newport-Inglewood Faults. As discussed there are no known active faults located on the subject property that would require mitigation.

Moderate to strong ground motion (acceleration) could be caused by an earthquake on any of the local or regional faults. As with any new project development in the State of California, building design and construction would conform to the current seismic design provisions of the City of Los Angeles Building Code, which incorporates relevant provision of the California Building Code. The Los Angeles Building Code incorporates the latest seismic design standards for structural loads and materials

The Geotechnical Investigation performed for the project indicated that development of the proposed project is feasible from a geotechnical perspective provided that the applicable regulations are met and construction and design are performed in a manner that mitigates potential impacts arising from the project site's geology and soils. Preliminary design recommendations are included in the Geotechnical Investigation, with regard to seismic design, site preparation and grading, foundation support, retaining walls and shoring, and site excavation. Prior to issuance of a grading permit, a final Geotechnical Investigation with final design recommendations will be reviewed by the Department of Building and Safety and subject to modification as/if necessary to meet all regulatory requirements. Therefore, compliance with the California Building Code, Los Angeles Municipal Code, and Mitigation Measure D-1 would ensure that adequate structural protection would be provided in the event of an earthquake, thus reducing impacts from strong seismic ground shaking to a less than significant level.

(c) Liquefaction

The project site is not included in within a State of California Seismic Hazard Zone for earthquake liquefaction or seismic ground deformation. Furthermore, the vast majority of liquefaction hazards are associated with loose to medium dense sand and silty sand that are normally consolidated and Holocene in age. Predominantly fine-grained soils, such as silts and clay, are less susceptible to liquefaction, as is the case with the proposed project. The site is underlain by over-consolidated, older alluvial deposits (Pleistocene age), which are not subject to liquefaction. Therefore, the liquefaction potential of the site is low. Similarly, hazards associated with liquefaction, such as lateral spreading, ground failure, and dynamic settlement are considered low to nil. As such, impacts regarding liquefaction on-site would be less than significant, and no mitigation measures would be necessary.[12]

[12] *Geotechnical Investigation, Feffer Geological Consulting, JoshuaR. Feffer and JonA. Irvine.*

(d) Landform/Landslide

The project site and surrounding area are relatively flat with no pronounced highs or lows. Furthermore, the project site is graded and located in an urbanized area. No distinct or prominent geologic or topographic features are located on the project site such as hilltops, ridges, hillslopes, canyons, ravines, rock outcrops, water bodies, streambeds, or wetlands. Therefore, no impact from landslides or other forms of natural slope instability, or landform alteration would occur on the project site.

(e) Expansive Soils – Settlement and Expansive Soils

The on-site near-surface soil was found to possess low to moderate expansive characteristics, based upon field soil classifications and expansion index testing performed in accordance with the Expansion Index testing. Due to this low to moderate potential for expansion, no design recommendations regarding expansive soils beyond the minimum required by the City's Department of Building and Safety is required. With adherence to the City's minimum standards, potential impacts regarding expansive soils would be less than significant.

(f) Temporary Excavations Site Stability

Project excavation would cause disturbance of existing soil conditions and result in a project site that is prone to local raveling or caving. The Geotechnical Investigation includes preliminary design recommendations with regard to slope stability and shoring, such as the use of retaining walls. As noted above, the recommendations of the final Geotechnical Investigation will be subject to review by the Department of Building and Safety and would be implemented as approved and/or modified pursuant to City regulations and information regarding the final design of the proposed buildings, pursuant to Mitigation Measure D-1. With implementation of Mitigation Measure D-1, potential impacts from site instability would be less than significant.

(3) Consistency with Applicable Regulations

(a) Alquist-Priolo Earthquake Fault Zoning Act

As previously discussed, the project site is not located within a State-designated Alquist Priolo earthquake fault zone. Therefore, the proposed project would not be subject to special design requirements (i.e., setbacks) or additional studies as required by the Alquist-Priolo Earthquake Fault Zoning Act. The closest known active faults to the site are the Malibu Coast and the Newport-Inglewood Faults. The east-west trending Santa Monica Fault is located about 0.25 kilometers north of the site however this fault has not been established as Active by the State of California. However, several studies indicate that it is likely active and will likely soon be officially designated as an active fault. Based on discussion with MACTEC Engineering and Consulting, Inc., the geotechnical firm performing geotechnical services for the Metro Rail Westside Subway Extension, ongoing evaluations of the fault hazard within the area surrounding the subject site is being performed. The Metro Rail information, once released, will be incorporated into the report for the subject site. To date, no active faults have been found on the subject site.

(b) Seismic Hazards Mapping Act

In accordance with the State of California Seismic Hazards Mapping Act, the subject site is not located within an area potentially affected by earthquake induced liquefaction. Additionally, the site-specific investigation

included in the Geotechnical Investigation has determined that the over-consolidated site soils would not be prone to liquefaction. Therefore, the project would be in compliance with the Seismic Hazards Mapping Act.

(c) Los Angeles General Plan Safety Element

The Project site is located within a City-designated potentially liquefiable area. A site-specific liquefaction analysis was performed and the project would comply with the safety guidelines set forth in California Geological Survey SP 117, as well as State and local building and safety codes, and preliminary design recommendations set forth in the Geotechnical Investigation for the project. As such, the project would be in compliance with the Los Angeles General Plan Safety Element.

(d) Los Angeles Municipal Code

The proposed project would be designed and constructed in accordance with all Los Angeles Municipal Code requirements, including those set forth regarding building safety and seismic risks. As such, the project would be in compliance with Los Angeles Municipal Code requirements.

4. CUMULATIVE IMPACTS

Impacts associated with geologic and soil issues are typically confined to a project site or within a very localized area and do not affect off-site areas associated with the 40 related projects identified in Section III, Environmental Setting, or other ambient growth. Cumulative development in the area would, however, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards. Nevertheless, related projects would be subject to established guidelines and regulations pertaining to seismic hazards. As such, adherence to applicable building regulations and standard engineering practices would ensure that cumulative impacts would be less than significant.

5. MITIGATION MEASURES

Mitigation Measure D-1: Prior to issuance of a grading permit, a qualified geotechnical engineer shall prepare and submit to the Department of Building and Safety a final Geotechnical Investigation that provides recommendations to address seismic safety and design requirements for foundations, retaining walls/shoring and excavation. A qualified geotechnical engineer shall be retained by the Applicant to be present on the project site during excavation, grading, and general site preparation activities to monitor the implementation of the recommendations specified in the Geotechnical Investigation as well as other recommendations made in subsequent geotechnical investigations prepared for the project subject to City review and approval. When/if needed, the geotechnical engineer shall provide structure-specific geologic and geotechnical recommendations which shall be documented in a report to be approved by the City and appended to the project's previous geotechnical investigations.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of Mitigation Measure D-1 above, potential impacts of the project associated with geology and soils would be reduced to less than significant levels.

IV. ENVIRONMENTAL IMPACT ANALYSIS
E. GREENHOUSE GAS EMISSIONS

1. INTRODUCTION

This section describes applicable Federal, State, and local regulations that address greenhouse gas (GHG) emissions and global climate change in California and the Los Angeles region. Existing climate conditions and influences on global climate change are also described, and an analysis is provided to assess potential cumulative and project related contributions to global climate change. The analysis accounts for energy and resource conservation measures that have been incorporated into the proposed project and pertinent State mandated GHG emission reduction measures. GHG emission calculations prepared for the proposed project are provided in Appendix B.4

2. REGULATORY FRAMEWORK

a. Federal Regulations

In 2007, the US Supreme Court ruled in Massachusetts v. Environmental Protection Agency that GHGs are air pollutants covered under the Clean Air Act (CAA). Since the EPA is responsible for overseeing compliance with the Clean Air Act, emissions of GHGs fall under the jurisdiction of the EPA, which is therefore obligated to regulate them. As of January 2, 2011, the EPA requires GHG analyses to be performed as part of permitting requirements for projects which are currently undergoing the permitting process.

On April 23, 2009, EPA published its Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Clean Air Act (Endangerment Finding) in the Federal Register. The Endangerment Finding is based on Section 202(a) of the Clean Air Act, which states that the Administrator (of EPA) should regulate and develop standards for "emission[s] of air pollution from any class or classes of new motor vehicles or new motor vehicle engines, which in [its] judgment cause, or contribute to, air pollution that may reasonably be anticipated to endanger public health or welfare." The proposed rule addresses Section 202(a) in two distinct findings. The first addresses whether or not the concentrations of the six key GHGs (i.e., CO2, CH4, N2O, HFCs, perflurorocarbons [PFCs], and SF6) in the atmosphere threaten the public health and welfare of current and future generations. The second addresses whether or not the combined emissions of GHGs from new motor vehicles and motor vehicle engines contribute to atmospheric concentrations of GHGs and therefore the threat of climate change.

The Administrator proposed the finding that atmospheric concentrations of GHGs endanger the public health and welfare within the meaning of Section 202(a) of the CCA. The evidence supporting this finding consists of human activity resulting in "high atmospheric levels" of GHG emissions, which are very likely responsible for increases in average temperatures and other climatic changes. Furthermore, the observed and projected results of climate change (e.g., higher likelihood of heat waves, wildfires, droughts, sea level rise, higher intensity storms) are a threat to the public health and welfare. Therefore, GHGs were found to endanger the public health and welfare of current and future generations.

The Administrator also proposed the finding that GHG emissions from new motor vehicles and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. The proposed finding cites that in 2006, motor vehicles were the second largest contributor to domestic GHG emissions (24% of total) behind electricity generation. Furthermore, in 2005, the United States was responsible for 18% of global GHG emissions. Therefore, GHG emissions from motor vehicles and motor vehicle engines were found to contribute to air pollution that endangers public health and welfare.

On May 19, 2009, President Obama announced a new Federal policy "aimed at both increasing fuel economy and reducing GHG pollution for all new cars and trucks sold in the United States." The policy proposed fuel efficiency standards that apply to model years 2012 through 2016. These standards will result in a reduction of approximately 900 million metric tons of GHG. The new National Fuel Efficiency Policy is expected to increase fuel economy by more than 5 percent by requiring a fleet-wide average of 35.5 miles per gallon by 2016 starting with model years 2012.

b. State Regulations

In response to growing scientific and political concern regarding global climate change, in the last decade California has promulgated a series of executive orders, laws, and regulations aimed at reducing both the level of GHGs in the atmosphere and emissions of GHGs from commercial and private activities within the State.

In September 2002, Governor Gray Davis signed Assembly Bill (AB) 1493 (Pavley), requiring the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. It should be noted that setting emission standards on automobiles is solely the responsibility of the Federal EPA. The Federal Clean Air Act allows States to set state-specific emission standards on automobiles if they first obtain a waiver from the U.S. EPA. The U.S. EPA initially denied California's request for a waiver, thus delaying the California Air Resources Board's (CARB) proposed implementation schedule for setting emission standards on automobiles to help reduce GHGs. After the change in presidential administrations in 2009, however, EPA was directed to reexamine its position for denial of California's Clean Air Act waiver and for its past opposition to GHG emissions regulation. California received the waiver on June 30, 2009. A comparison between the AB 1493 standards and the Federal Corporate Average Fuel Economy was completed by the California Air Resources Board and is available at http://www.arb.ca.gov/cc/ccms/ab1493_v_cafe_study.pdf.

In June 2005, Governor Schwarzenegger signed Executive Order S-3-05, which proclaims that California is vulnerable to the impacts of climate change. It declares that increased temperatures could reduce the Sierra Nevada snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea level. To combat those concerns, the Executive Order established total GHG emission targets. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80% below the 1990 level by 2050. The order directed the Secretary for the California EPA to report every two years on the State's progress toward meeting the Governor's GHG emission reduction targets. As a result of this Executive Order, the California Climate Action Team (CAT), led by the Secretary of the California EPA, was formed. The CAT is made up of representatives from a number of State agencies and was formed to implement global warming emission reduction programs and report on the progress made toward meeting statewide targets established under the Executive Order. State agency members include the Business, Transportation and

Housing Agency; Department of Food and Agriculture; Resources Agency; Air Resources Board; California Energy Commission; the Public Utilities Commission; and Department of Water Resources. The CAT published its Climate Action Team Report to Governor Schwarzenegger and the Legislature in March 2006, in which it laid out 46 specific emission reduction strategies for reducing GHG emissions and reaching the targets established in the Executive Order.

In September 2006, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, also known as AB 32, into law. AB 32 enacts into legislation some, but not all, of the 2005 Executive Order targets noted above. In particular, it commits the State to achieving the following:

- 2000 GHG emission levels by 2010, which represents an approximately 11 percent reduction from emissions as the result of "business as usual" (BAU); and
- 1990 levels by 2020, which represents approximately 28.4 percent below BAU.[1]

To achieve these goals, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to achieve the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. The following schedule outlines the CARB actions mandated by AB 32:

- By January 1, 2008, CARB adopts regulations for mandatory GHG emissions reporting, defines 1990 emissions baseline for California (including emissions from imported power), and adopts it as the 2020 statewide cap. The 2020 emissions cap was set at 427 million metric tons of carbon dioxide equivalents (MMT CO2e).
- By January 1, 2009, CARB adopts plan to effect GHG reductions from significant sources of GHG via regulations, market mechanisms and other actions.[2]
- During 2009, CARB drafts rule language to implement its plan and holds a series of public workshop on each measure (including market mechanisms).
- By January 1, 2010, early action measures will take effect.
- During 2010, CARB, after workshops and public hearings, conducts series of rulemakings to adopt GHG regulations including rules governing market mechanisms.
- By January 1, 2011, CARB completes major rulemakings for reducing GHGs, including market mechanisms. CARB may revise and adopt new rules after January 1, 2011 to achieve the 2020 goal.
- By January 1, 2012, GHG rules and market mechanisms adopted by CARB take effect and become legally enforceable.
- December 31, 2020 is the deadline for achieving 2020 GHG emissions cap.

CARB's list of discrete early action measures to be adopted and implemented before January 1, 2010 was approved on June 21, 2007, and focused on major State-wide contributing sources and industries, not on

[1] *The California Air Resources Board defines "business-as-usual" as emissions in the absence of any greenhouse gas reduction measures discussed in the Climate Change Scoping Plan.*

[2] *CARB released the Climate Change Proposed Scoping Plan in October 2008, which details the strategies that the State will use to reduce GHG emissions. The Plan was approved at the Board hearing in December 2008.*

individual development projects or practices. These early action measures included: (1) a low-carbon fuel standard; (2) reduction of refrigerant losses from motor vehicle air conditioning system maintenance; and (3) increased methane capture from landfills.

Recently, CARB released emissions inventory estimates for 2000 through 2008.[3] The inventory shows that as of 2008, transportation was the largest single sector generating carbon dioxide, responsible for 37 percent of the state's total emissions, largely (73 percent) from passenger vehicles. Transportation is followed by industrial emissions, 19 percent; imported electricity, 13 percent; in-state electricity generation, 12 percent; residential use, 6 percent; agriculture, 6 percent; and commercial uses, 3 percent. Statewide emissions as a whole, and not individual sectors, are required under AB 32 to meet the 2020 emissions cap.

A companion bill to AB 32, Senate Bill (SB) 1368, requires the California Public Utilities Commission (PUC) and California Energy Commission (CEC) to establish GHG emission performance standards for the generation of electricity. These standards will also generally apply to power generated outside California and imported into the State. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB in meeting its mandate under AB 32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard (EPS), which is a facility-based emissions standard requiring all new long-term commitments for baseload generation to serve California consumers to be granted only to power plants with GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of carbon dioxide (CO_2) per megawatt-hour (MW/hr). Further, on May 23, 2007, the CEC adopted regulations that establish and implement an identical EPS of 1,100 pounds of CO2 per MW/hr (see CEC order No. 07-523-7).

An additional bill related to AB 32, SB 97 was adopted in August 2007 and requires the California Office of Planning and Research (OPR) to prepare, develop, and transmit to the Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, including but not limited to, effects associated with transportation or energy consumption. OPR transmitted these guidelines by the July 1, 2009 deadline, the Resources Agency certified and adopted the guidelines prior to the January 1, 2010 deadline, and the guidelines went into effect in March 2010. The Resources Agency will be required to periodically update the guidelines to incorporate new information or criteria established by the CARB pursuant to AB 32.[4] OPR does not identify a threshold of significance for GHG emissions, nor has it prescribed assessment methodologies or specific mitigation measures. The amendments encourage lead agencies to consider many factors when performing a CEQA analysis, but preserve the discretion granted under CEQA to lead agencies to make their own determinations based on substantial evidence. The amendments also encourage public agencies to make use of tiering of programmatic mitigation plans and programs when performing individual project analyses.

Executive Order S-1-07, which was signed by Governor Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California, at over 40% of statewide emissions. It establishes a goal that the carbon intensity of transportation fuels sold in California should be reduced by a minimum of 10% by 2020. This order also directed CARB to determine if this Low Carbon Fuel Standard could be adopted as a discrete early action measure after meeting the mandates in AB 32. CARB adopted the

[3] *California Environmental Protection Agency, Air Resources Board, "Greenhouse Gas Inventory Data - 2000 to 2008," http://www.arb.ca.gov/cc/inventory/data/data.htm. 2010.*

[4] *Senate Bill No. 97, Chapter 185, approved by Governor Schwarzenegger and filed with the Secretary of State, August 24, 2007.*

Low Carbon Fuel Standard on April 23, 2009. The final regulation was approved by the Office of Administrative Law and filed with the Secretary of State on January 12, 2010; the Low Carbon Fuel Standard became effective on the same day.

The California Air Resources Board expects the Low Carbon Fuel Standard to achieve the minimum 10 percent reduction goal; however, many of the early action items outlined in the Climate Change Scoping Plan work in tandem with one another. To avoid the potential for double-counting emission reductions associated with Assembly Bill 1493 (see discussion above), the Climate Change Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1 percent. In accordance with the Climate Change Scoping Plan, this analysis incorporates the modified reduction potential for the Low Carbon Fuel Standard.

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20% of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008, Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Energy Standard to 33% renewable power by 2020. Pursuant to Executive Order S-21-09, the California Air Resources Board also was preparing regulations to supplement the Renewables Portfolio Standard with a Renewable Energy Standard that will result in a total renewable energy requirement for utilities of 33% by 2020. But on April 12, 2011, Governor Jerry Brown signed Senate Bill 21 to increase California's Renewables Portfolio Standard (RPS) to 33 percent by 2020. Notably, unlike the prior 20% RPS, the current 33% RPS applies Publicly Owned Utilities, such as the Los Angeles Department of Water & Power.

In November 2008, the California Building Standards Commission established the California Green Building Standards Code (CALGreen) which sets performance standards for residential and nonresidential development to reduce environmental impacts and encourage sustainable construction practices. When the CALGreen code went into effect in 2009, compliance through 2010 was voluntary. As of January 1, 2011, the CALGreen code is mandatory for all new buildings constructed in the State. The CalGreen code addresses energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality.[5]

c. Regional Regulations

There has also been California legislative activity acknowledging the relationship between land use planning and transportation sector GHG emissions. California Senate Bill 375, signed on September 30, 2008, aligns regional transportation planning efforts, regional GHG emission reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS), which will prescribe land use allocation in that MPO's Regional Transportation Plan (RTP). CARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every eight years, but can be updated every four years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned

[5] *California 2010 Green Building Standards Code, California Code of Regulations Title 24, Part 11.*

targets. If MPOs do not meet the GHG emission reduction targets, transportation projects would not be eligible for funding programmed after January 1, 2012.

This bill also extends the minimum time period for the Regional Housing Needs Allocation (RNHA) cycle from five years to eight years for local governments located within an MPO that meets certain requirements. City or County land use policies (including general plans) are not required to be consistent with the RTP (and associated SCS or APS). However, new provisions of CEQA would incentivize qualified projects that are consistent with an approved SCS or APS, categorized as "transit priority projects."

In August 2010, CARB released the draft CEQA Functional Equivalent Document (FED) which proposes GHG emission reduction targets specific to each MPO. The CARB recognizes that GHG reduction measures may be unique to certain areas of California where GHG reduction measures in one area may not be feasible in another. The project is located in the Southern California Association of Governments (SCAG) MPO, which has proposed regional GHG reduction targets as required under SB 375. Recently, SCAG proposed a goal of reducing per capita GHGs emissions by 8 percent for Year 2020 and 13 percent for Year 2035 compared to Year 2005. These reduction goals would be incorporated into the next version of the RTP, which is expected to be adopted in 2012. Projects going through the CEQA process would be required to demonstrate consistency with SCAG (RTP) policies including specified GHG reduction targets. Additionally, SCAG is currently developing an SCS plan to meet emission reduction targets. One goal of the SCS plan is compliance with the provisions of SB 375 by establishing a reduction target for cars and light trucks. This plan is currently in development and is expected to be finalized in 2012, as part of the next RTP.

Although CARB and SCAG are tasked with setting GHG reduction targets, there is no regional agency responsible for the regulation of GHG emissions related to global climate change. The South Coast Air Quality Management District (SCAQMD) is the agency principally responsible for comprehensive air pollution control in the South Coast Air Basin (SoCAB), which encompasses Orange County and the urban portions of Los Angeles, Riverside, and San Bernardino counties. Although the SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate factors leading to global climate change or GHG emission issues associated with plans and new development projects throughout the SoCAB. In order to provide GHG emission analysis guidance to the local jurisdictions within the SoCAB, the SCAQMD has organized a Working Group to develop GHG emission analysis guidance and thresholds.

On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where the SCAQMD is lead agency, with the goal of achieving a 90 percent emission capture rate. This goal was determined by SCAQMD staff to be more appropriate to address the long-term adverse impacts associated with global climate change because most projects will be required to implement GHG reduction measures. Further, it was determined that a 90 percent emission capture rate sets the emission threshold low enough to capture a substantial fraction of future stationary source projects that will be constructed to accommodate future statewide population and economic growth, while setting the emission threshold high enough to exclude small projects that will in aggregate contribute a relatively small fraction of the cumulative statewide GHG emissions. If CARB adopts the statewide significance thresholds, SCAQMD staff will report back to the Board regarding any recommended changes or additions to the SCAQMD's interim stationary source/industrial threshold.

The SCAQMD has not adopted a CEQA significance threshold, interim or otherwise, for GHG emissions associated with residential/commercial development, such as the proposed project.

d. Local Regulations

In acknowledgment of the overlap between land use and GHG emissions, the City of Los Angeles, in May 2007, published *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming*[6] *(LA Green Plan)*, outlining the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the *LA Green Plan*, the City of Los Angeles is committed to the goal of reducing emissions of CO_2 to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

To achieve goals outlined in the LA Green Plan, in April 2008, the City of Los Angeles adopted a green building ordinance to address the impact on climate change from new development. The new ordinance establishes the Green Building Ordinance, whereby certain new development projects of 50,000 square feet or more with more than 50 residential units must at a minimum meet the intent of the "certified" performance level under the US Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED™) program. Examples of green building project features to meet LEED™ certification standards include increasing use of renewable energy and energy efficiency, water saving fixtures, water efficient landscaping, recycling materials for construction, use of renewable building materials and increase use of mass transit or alternative modes of transportation.

3. EXISTING CONDITIONS

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation and storms. Historical records indicate that global climate changes have occurred in the past due to natural phenomena; however current data increasingly indicate that the current global conditions differ from past climate changes in rate and magnitude. Global climate change attributable to man-made GHG emissions is currently one of the most important and widely debated scientific, economic and political issues in the United States and the world. The extent to which increased concentrations of GHGs have caused or will cause climate change and the appropriate actions to limit and/or respond to climate change are the subject of significant and rapidly evolving regulatory efforts at the federal and state levels of government.

GHGs are those compounds in the Earth's atmosphere which play a critical role in determining temperature near the Earth's surface. More specifically, these gases allow high-frequency shortwave solar radiation to enter the Earth's atmosphere, but retain some of the low frequency infrared energy which is radiated back from the Earth towards space, resulting in a warming of the atmosphere. GHGs include CO_2, methane (CH_4), ozone (O_3), water vapor, nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). Carbon dioxide is the most abundant GHG in the atmosphere. GHGs are the result

[6] *See: http://www.cityofla.org/EAD/EADWeb-AQD/GreenLA_CAP_2007.pdf.*

of both natural and man-made activities, with the primary sources of emissions being transportation, consumption of fossil fuels for power generation, industrial processes, forest fires, decomposition, landfills, and heating and cooking.

Not all GHGs possess the same ability to induce climate change; as a result, GHG contributions are commonly quantified in the equivalent mass of CO_2, denoted as CO_2e. Mass emissions are calculated by converting pollutant specific emissions to CO_2e emissions by applying the proper global warming potential (GWP) value.[7] These GWP ratios are available from the U.S. EPA and are published in the California Climate Action Registry (CCAR) General Reporting Protocol. By applying the GWP ratios, project-related CO_2e emissions can be tabulated in metric tons per year. The CO_2e values are calculated for construction years as well as existing and project build-out conditions in order to generate a net change in GHG emissions for construction and operation.

a. Greenhouse Gas Inventory

Worldwide man-made emissions of GHGs were approximately 40,000 million metric tons of CO_2e, including ongoing emissions from industrial and agricultural sources, but excluding emissions from land use changes (i.e., deforestation, biomass decay) (Intergovernmental Panel on Climate Change [IPCC], 2007). CO_2 emissions from fossil fuel use accounts for 56.6 percent of the total emissions of 49,000 million metric tons CO_2e (includes land use changes) and all CO_2 emissions are 76.7 percent of the total. Methane emissions account for 14.3 percent and N_2O emissions for 7.9 percent (IPCC, 2007).[8]

Total U.S. GHG emissions in 2008 were 6,958 million metric tons CO_2e, or about 14 percent of worldwide GHG emissions.[9] Overall, total U.S. emissions have risen by 14 percent from 1990 to 2008. However, U.S. emissions decreased by 2.9 percent (211.3 MMT CO_2e) between 2007 and 2008, due in large part to the record high costs of petroleum fuels that occurred in 2008. Electricity demand declined in 2008 for the same reason. The primary GHG emitted as the result of human activities in the United States was CO_2, representing approximately 85.1 percent of total GHG emissions.[10] The largest source of CO_2, and of overall GHG emissions, was fossil fuel combustion. Methane (CH_4) emissions, which have declined from 1990 levels, resulted primarily from enteric fermentation associated with domestic livestock, decomposition of wastes in landfills, and natural gas systems. Agricultural soil management and mobile source fossil fuel combustion were the major sources of N2O emissions. The emissions of substitutes for ozone depleting substances and emissions of HFC-23 (trifluoromethane or CHF3) during the production of HCFC-22 (chlorodifluoromethane or CHClF2) were the primary contributors to aggregate HFC (hydrofluorocarbon) emissions. Electrical transmission and distribution systems accounted for most SF6 (sodium hexafluoride) emissions, while PFC

[7] *CO_2e was developed by the Intergovernmental Panel on Climate Change (IPCC), and published in its Second Assessment Report (SAR) 1996.*

[8] *Carbon dioxide equivalent (CO_2e) is a quantity that describes, for a given mixture and amount of GHGs, the amount of CO_2 (usually in metric tons; million metric tons [megaton] = $MMTCO_2E$ = terragram [Tg] CO_2 Eq; [1,000 MMT = gigaton) that would have the same global warming potential (GWP) when measured over a specified timescale (generally, 100 years).*

[9] *U.S. EPA, 2010 U.S. Greenhouse Gas Inventory Report (2010).*

[10] *U.S. EPA, 2010 U.S. Greenhouse Gas Inventory Report.*

(perfluorocarbons) emissions resulted from semiconductor manufacturing and as a by-product of primary aluminum production.[11]

The residential and commercial end-use sectors accounted for 21 percent and 19 percent, respectively, of CO_2 emissions from fossil fuel combustion in 2008.[12] Both sectors relied heavily on electricity for meeting energy demands, with 71 and 79 percent, respectively, of their emissions attributable to electricity consumption for lighting, heating, cooling, and operating appliances. The remaining emissions were due to the consumption of natural gas and petroleum for heating and cooking. California is a substantial contributor of global GHGs as it is the second largest contributor in the United States and the sixteenth largest in the world (AEP, 2007). Based upon the 2008 GHG inventory data (the latest year available) compiled by the CARB (CARB, 2008), California produced 474 MMT CO_2e. The major source of GHG in California is transportation, contributing 37 percent of the state's total GHG emissions. Electricity generation is the second largest source, contributing 25 percent of the state's GHG emissions (CARB, 2008). Most, 85 percent, of California's 2008 GHG emissions (in terms of CO_2e) were carbon dioxide produced from fossil fuel combustion, with 2.5 percent from other sources of CO_2, 6.0 percent from methane, and 2.8 percent from nitrous oxide (CARB, 2008). California emissions are due in part to its large size and large population.

b. Effects of Global Climate Change

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain significant scientific uncertainties, for example, in predictions of local effects of climate change, occurrence of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. Due to the enormous complexity of the Earth's climate system, the uncertainty surrounding climate change may never be completely eliminated. Because of these uncertainties, there continues to be significant debate over which increased concentrations of GHGs are responsible for climate change, and over the appropriate actions to limit and/or respond to climate change.

The IPCC, in its Fourth Assessment Report (FAR), stated that "it is likely that there has been significant warming due to human activity over the past 50 years."[13] However, it is impossible to identify a single development project as the cause of future specific climate change impacts due to the global nature of climate change. Also in the FAR, the IPCC holds that the impacts of future climate change will vary across regions. While "large-scale climate events have the potential to cause very large impacts," the impacts of future climate change will be mixed across regions.

According to the CARB, some of the potential impacts in California of global warming may include loss in snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (CARB, 2007). Below is a summary of some of the potential effects, reported by an array of studies that could be experienced in California as a result of global warming and climate change:

[11] *U.S. EPA, 2010 U.S. Greenhouse Gas Inventory Report.*

[12] *U.S. EPA, 2010 U.S. Greenhouse Gas Inventory Report.*

[13] *Intergovernmental Panel on Climate Change, Fourth Assessment Report, Summary for Policy Makers, 2007.*

Air Quality. Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone, but the magnitude of the effect, and therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would further worsen air quality. However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would tend to temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (CEC, February 2006).

Water Supply. Uncertainty remains with respect to the overall impact of global climate change on future water supplies in California. Studies have found that, "Considerable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change." (Kiparsky et al. 2003). For example, some studies identify little change in total annual precipitation in projections for California (California Climate Change Center, 2008). Other studies show significantly more precipitation (Climate Change and California Water Resources [(DWR 2006)]). Even assuming that climate change leads to long-term increases in precipitation, analysis of the impact of climate change is further complicated by the fact that no studies have identified or quantified the runoff impacts such an increase in precipitation would have in particular watersheds.[14] Also, little is known about how groundwater recharge and water quality would be affected (Ibid.). Higher rainfall could lead to greater groundwater recharge, although reductions in spring runoff and higher evapotranspiration could reduce the amount of water available for recharge (Ibid.).

The California Department of Water Resources (DWR 2006) report on climate change and effects on the State Water Project (SWP), the Central Valley Project, and the Sacramento-San Joaquin Delta, concludes that "[c]climate change will likely have a significant effect on California's future water resources. . . [and] future water demand." It also reports that "much uncertainty about future water demand [remains], especially [for] those aspects of future demand that will be directly affected by climate change and warming. While climate change is expected to continue through at least the end of this century, the magnitude and, in some cases, the nature of future changes is uncertain" (DWR, 2006). The relationship between climate change and its potential effect on water demand is not well understood (DWR, 2006). DWR adds that "[i]t is unlikely that this level of uncertainty will diminish significantly in the foreseeable future." Still, changes in water supply are expected to occur, and many regional studies have shown that large changes in the reliability of water yields from reservoirs could result from only small changes in inflows (Kiparsky 2003; DWR 2005; Cayan 2006, Cayan, D., et al, 2006).

Hydrology. As discussed above, climate changes could potentially affect: the amount of snowfall, rainfall and snow pack; the intensity and frequency of storms; flood hydrographs (flash floods, rain or snow events, coincidental high tide and high runoff events); sea level rise and coastal flooding; coastal erosion; and the potential for salt water intrusion. Sea level rise can be a product of global warming through two main processes: expansion of sea water as the oceans warm, and melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood-control facilities, including levees, to handle storm events.

[14] *California Climate Change Center (2006).*

Agriculture. California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase; crop-yield could be threatened by a less reliable water supply; and greater ozone pollution could render plants more susceptible to pest and disease outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality (CCCC, 2006).

Ecosystems and Wildlife. Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Increasing concentrations of GHGs are likely to accelerate the rate of climate change. Scientists expect that the average global surface temperature could rise 1.0-4.5°F (0.6- 2.5°C) in the next fifty years, and 2.2-10°F (1.4-5.8°C) in the next century, with significant regional variation (EPA 2000). Soil moisture is likely to decline in many regions, and intense rainstorms are likely to become more frequent. Sea level could rise as much as two feet along most of the U.S. coast. Rising temperatures could have four major impacts on plants and animals: (1) timing of ecological events; (2) geographic range; (3) species' composition within communities; and (4) ecosystem processes such as carbon cycling and storage (Parmesan, 2004; Parmesan, C. and H. Galbraith 2004.)

4. IMPACT ANALYSIS

a. Methodology

As described below, a number of methodologies and significance thresholds have been proposed for analyzing impacts on global climate change. However, at this time no definitive thresholds or methodologies have been approved for determining the significance of a project's potential cumulative contribution to global climate change in CEQA documents.

For the purposes of this EIR and as will be explained in more detail below, total GHG emissions from the proposed project were quantified to determine whether the project would be consistent with AB 32 (i.e., reduction of statewide GHG emissions to 1990 levels by 2020). As stated above, the mandate of AB 32 demonstrates California's commitment to reducing GHG emissions and the state's associated contribution to climate change, without intending to limit population or economic growth within the state. A particularly illustrative method to determine consistency with AB 32, and one that has the co-benefit of being based on quantification of emissions, is to compare a project's emissions as proposed to that project's emissions if it were to be built utilizing BAU design, methodology, and technology. If a project constitutes an equivalent or larger break from BAU than has been determined by CARB to be necessary to meet AB 32's goals for 2020 (approximately 28.4 percent), then that project can be considered consistent with AB 32 and, therefore, will not have a significant impact on the environment due to its greenhouse gas emissions.

This is the average level of emissions reduction performance that would need to be achieved across all sectors of the economy to meet AB 32 goals (i.e., applied to both new and existing greenhouse gas emissions sources), and CARB and other state agencies have indicated that specific sectors of the economy may be required to contribute greater levels of reduction.[15]

[15] *According to the Bay Area Air Quality Management District, the land use sector only need achieve a 26 percent reduction from BAU to meet AB 32's requirements: "As stated above, to meet the requirements set forth in AB 32 (i.e., achieve California's 1990 equivalent*

CCAR has prepared the General Reporting Protocol (GRP) for calculating and reporting GHG emissions from a number of general and industry-specific activities.[16] No specific protocols are available for land use projects, so the CCAR GRP has been adapted to address GHG emissions from the proposed project. The information provided in this section is consistent with the CCAR GRP's minimum reporting requirements. The CCAR GRP recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include:

- Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).
- Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.
- Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy.[17]

CARB believes that consideration of so-called indirect emissions provides a more complete picture of the GHG footprint of a facility: "As facilities consider changes that would affect their emissions – addition of a cogeneration unit to boost overall efficiency even as it increases direct emissions, for example – the relative impact on total (direct plus indirect) emissions by the facility should be monitored. Annually reported indirect energy usage also aids the conservation awareness of the facility and provides information" to CARB to be considered for future strategies by the industrial sector.[18] For these reasons, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, OPR directs lead agencies to "make a good-faith effort, based on available information, to calculate, model, or estimate…GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities."[19] Therefore, direct and indirect emissions have been calculated for the proposed project.

For purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider only those GHG emissions resulting from proposed project-related incremental (net) increase in the use of on-road mobile vehicles, electricity, and natural gas compared to existing conditions. This includes project construction activities such as demolition, hauling, and construction worker trips. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis.

GHG emissions levels by 2020) California would need to achieve an approximate 28 percent reduction in emissions across all sectors of the GHG emissions inventory compared with 2020 projections. However, to meet the AB 32 reduction goals in the emissions sectors that are related to land use development (e.g., on-road passenger and heavy duty motor vehicles, commercial and residential area sources [i.e., natural gas], electricity generation/consumption, wastewater treatment, and water distribution/consumption), staff determined that California would need to achieve an approximate 26 percent reduction in GHG emissions from these land use-driven sectors (ARB 2009a) by 2020 to return to 1990 land use emission levels." Bay Area Air Quality Management District, California Environmental Quality Act Guidelines Update – Proposed Thresholds of Significance, at 14 (December 7, 2009)(available at http://www.baaqmd.gov/Divisions/Planning-and-Research/CEQAGUIDELINES.aspx).

[16] *California Climate Action Registry, General Reporting Protocol Version 3.1, 2009.*

[17] *Embodied energy includes energy required for water pumping and treatment for end-uses.*

[18] *California Air Resources Board (CARB), 2007a. Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (Assembly Bill 32). Planning and Technical Support Division Emission Inventory Branch, October 19, 2007.*

[19] *OPR Technical Advisory, p. 5.*

Construction emissions were calculated using the CalEEMod model, which is based on OFFROAD2007 and EMFAC2007 model outputs. CalEEMod is a statewide land use emissions computer model which calculates criteria pollutant and greenhouse gas emissions associated with construction and operation from a variety of land use projects. The model was developed in collaboration with the air districts of California including the SCAQMD. OFFROAD 2007 and EMFAC2007 are emissions estimation models developed by CARB to calculate emissions from construction activities. The output values used in this analysis were adjusted to be project-specific, based on equipment usage rates, type of fuel, and construction schedule. These values were then applied to the construction phasing assumptions used in the criteria pollutant analysis to generate GHG emissions values for each construction year (refer to Appendix B.4 of this Draft EIR). CalEEMod outputs report CO_2,, CH_4, and N_2O emissions. In CalEEMod, values are derived from factors published in the *2006 Intergovernmental Panel on Climate Change (IPCC) Guidelines for National Greenhouse Gas Inventories*. These values are then converted to metric tons for consistency. The CO_2e values are calculated for the entire construction period as well as existing and future project build-out conditions in order to generate a net change in GHG emissions for construction and operation (refer to Appendix B.4 of this Draft EIR). In accordance with SCAQMD guidance, GHG emissions from construction have been amortized over the 30-year lifetime of the project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions).

Mobile source emission calculations associated with operation of the proposed project are also calculated using the CalEEMod model. The model utilizes a projection of annual vehicle miles traveled (VMT), which is derived from the Traffic Study conducted for the project (provided in Appendix B.4 of this Draft EIR). These values account for the daily and seasonal variations in trip frequency and length associated with the project trips. Mobile source emissions also account for residents traveling to and from work and other activities that require a commute. Modeling options are available in the CalEEMod model to account for vehicular trip reducing project features. Net emission values are calculated based on the difference between existing conditions and project buildout conditions. Mobile source calculations also utilize EMFAC2007 and the CCAR GRP, Version 3.1 to generate emission factors for CO_2 and CH_4, and N_2O. These emission factors are then applied to the annual VMT calculated in the Traffic Study.

The calculation of emissions is evaluated for the proposed project with the project design features that would reduce GHG emissions, and then compared to the GHG emissions that would occur under a "business as usual" or BAU scenario. The BAU scenario assumes construction and operation of comparable amenities (housing) similar in scale and size to serve the regional need. A BAU case does not consider the site-specific benefits or reductions in GHG emissions resulting from co-location of uses, availability of public transportation, project design features, or prescribed mitigation measures. "Business as usual" scenario emissions estimates assume energy and water consumption, emission factors, and GHG emission reduction measures in accordance with the minimum regulatory requirements in place at the time AB 32 was enrolled in 2006, and therefore based on an annual emissions inventory prepared by CARB for year 2005.

Emissions calculations for the project include credits or reductions for project design features and other GHG reducing measures required by regulation, such as reductions in energy or water demand. Since the project is subject to the LA Green Building Ordinance and CALGreen standards, project features will be incorporated consistent with the standards of the LEED™ "certified" rating. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. Modeling

options are available in the CalEEMod model to account for such vehicular trip-reducing project features as detailed below.

- Increase density of residential units to reduce sprawl
- Locate project closer to urban centers or areas with a high concentration of jobs (downtown)
- Transit — close proximity to local transit lines, specifically bus lines.
- Bike and Pedestrian (non-motorized access to transit) — accessibility to the project site from sidewalks and bicycle lanes.

Trip and VMT reductions are calculated based on distance from the project to employment centers (e.g., Century City) and transit centers (e.g., numerous bus lines and the proposed extension of the Westside subway system). Projects which place residential uses near centers of employment would reduce the commute distance required for Trip and VMT reduction calculations as detailed in Appendix B.4 of this Draft EIR. Mobile source emission calculations associated with operation of the proposed project utilize a projection of annual vehicle miles traveled (VMT), which is derived from the Traffic Study performed for the project, Appendix H of this Draft EIR. These values account for the daily and seasonal variations in trip frequency and length associated with various land uses. Net emission values are calculated based on the incremental increases from the existing conditions to the proposed project buildout conditions. In addition to mobile source (vehicular) GHG emissions, the CalEEMod model also calculates GHG emissions from sources such as energy usage, water and wastewater usage and solid waste generation.

With regard to energy usage, the consumption of fossil fuels to generate electricity and to provide heating and hot water results in GHG emissions. Future fuel consumption rates are based on the project's number of dwelling units. Energy usage (off-site electricity generation and on-site natural gas consumption) for the proposed project is calculated within CalEEMod using the Residential Appliance Saturation Survey (RASS).

Water and waste water generated from the project require energy to supply, distribute and treat. CalEEMod calculates water usage based on the Pacific Institute "Waste Not Want Not" report[20]. The California Energy Commission's estimate for energy intensity of the water use cycle in southern California is used to calculate the energy usage related to water conveyance. Emission factors from the CCAR GRP, Version 3.1 are implemented in calculating the associated GHGs. Because water conveyance associated with the proposed project is regional in nature, the emission factors used in this component of the analysis represent a State-wide average of known power producing facilities, utilizing various technologies and emission control strategies.

Emissions from solid waste handling generated from the project are also accounted for in the GHG emissions inventory. Waste disposal rates from the California Department of Resources Recycling and Recovery (CalRecycle) data for individual land uses was used to estimate the amount of waste generated by the

[20] *Gleick, P.H.; Haasz, D.; Henges-Jeck, C.; Srinivasan, V.; Cushing, K.K.; Mann, A. 2003. Waste Not, Want Not: The Potential for Urban Water Conservation in California. Published by the Pacific Institute for Studies in Development, Environment, and Security. Full report available online at: http://www.pacinst.org/reports/urban_usage/waste_not_want_not_full_report.pdf . Appendices available online at: http://www.pacinst.org/reports/urban_usage/appendices.htm*

project. GHG emissions from solid waste are calculated based on decomposition of waste into methane based on AP-42, EPA's Compilation of Air Pollutant Emission Factors.[21]

a. Significance Thresholds

Until the passage of AB 32, California Environmental Quality Act documents generally did not evaluate greenhouse gas emissions or impacts on global climate change. The primary focus of air pollutant analysis in California Environmental Quality Act documents was the emission of criteria pollutants, or those identified in the State and Federal Clean Air Acts as being of most concern to the public and government agencies. With the passage of AB 32, a more detailed analysis of greenhouse gas emissions is recommended in California Environmental Quality Act documents. However, the analysis of greenhouse gases is different from the analysis of criteria pollutants. Since the half-life of carbon dioxide is approximately 100 years, greenhouse gases affect the global climate over a relatively long timeframe. Conversely, for criteria pollutants, significance thresholds/impacts are based on daily emissions; and the determination of attainment or non-attainment are based on the daily exceedance of applicable ambient air quality standards (e.g., one-hour and eight-hour exposures).

In its January 2008 California Environmental Quality Act and Climate Change white paper, the California Air Pollution Control Officers Association identified a number of potential approaches for determining the significance of greenhouse gas emissions in California Environmental Quality Act documents. In its white paper, the California Air Pollution Control Officers Association suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by the lead agency. One of the potential approaches identified in the California Air Pollution Control Officers Association White Paper, Threshold 1.1, would require a project to meet a percent reduction target. This target would be based on the average reduction from BAU emissions identified by CARB as necessary to satisfy AB 32's mandate of returning to 1990 levels of greenhouse gas emissions by 2020. CARB has calculated the necessary reduction to be approximately 28.4 percent from BAU.

The Office of Planning and Research, in its June 19, 2008 Technical Advisory, recognized that California Environmental Quality Act guidelines had not been adopted to provide guidance as to how climate change is to be addressed under the California Environmental Quality Act. The Office of Planning and Research provided the following "informal guidance" regarding the following steps for addressing climate change impacts under the California Environmental Quality Act:

- Identify and quantify the greenhouse gas emissions;
- Assess the significance of the impact on climate change; and
- If significant, identify alternatives and/or mitigation measures that will reduce impacts below significance.[22]

Additionally, the City of Los Angeles CEQA Thresholds Guide (2006) does not currently provide guidance as to how climate change issues are to be addressed.

[21] *AP 42, Compilation of Air Pollutant Emission Factors, has been published since 1972 as the primary compilation of EPA's emission factor information. It contains emission factors and process information for more than 200 air pollution source categories.* http://www.epa.gov/ttnchie1/ap42/

[22] *Office of Planning and Research Technical Advisory, p. 5.*

On December 30, 2009, the Office of Planning and Research transmitted proposed California Environmental Quality Act Guidelines Amendments for Greenhouse Gas Emissions were adopted by the Natural Resources Agency. Notably, the amendments did not establish a threshold of significance; instead lead agencies are called on to establish significance thresholds for their respective jurisdictions. The California Environmental Quality Act Guidelines Amendments also clarified "that the effects of greenhouse gas emissions are cumulative, and should be analyzed in the context of California Environmental Quality Act's requirements for cumulative impact analysis."[23]

OPR transmitted the Guidelines Amendments by the July 1, 2009 deadline, the Resources Agency certified and adopted the guidelines prior to the January 1, 2010 deadline, and the guidelines went into effect in March 2010. Appendix G of the State *CEQA Guidelines* provides sample checklist questions for use in an Initial Study to determine a project's potential for environmental impacts. The most recent amendments relating to climate change and GHG emissions encourage lead agencies to consider many factors in performing a CEQA analysis, but preserve the discretion granted by CEQA to lead agencies in making their own determinations based on substantial evidence. The Guideline amendments include the following questions:

Would the project:

- Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment, based on any applicable threshold of significance?
- Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?

CEQA leaves the determination of significance to the reasonable discretion of the lead agency and encourages lead agencies to develop and publish thresholds of significance to use in determining the significance of environmental effects. However, neither the SCAQMD nor the City of Los Angeles has yet established specific quantitative significance thresholds for GHG emissions for residential or commercial projects. In the latest CEQA Guidelines amendments, which went into effect on March 18, 2010, OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform individual project analyses. However, currently the City of Los Angeles does not have a programmatic mitigation plan to tier from, such as a Greenhouse Reduction Plan, that meets the requirements set forth in the latest OPR guidelines.

Additionally, due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, it is speculative to identify the specific impact, if any, to global climate change from one project's incremental increase in global greenhouse gas emissions. As such, a project's greenhouse gas emissions and the resulting significance of potential impacts are more properly assessed on a cumulative basis. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) determining an inventory of project greenhouse gas emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by AB 32.

[23] *Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources (April 13, 2009).*

As discussed in Subsection 2, Regulatory Framework, above, AB 32 establishes GHG reduction targets for State-wide emissions, and not specific targets for the housing development sector. SCAG has proposed draft reduction targets specific to reductions expected from land use decisions at much lower levels, approximately 8 to 13 percent below BAU. Therefore, demonstrating consistency with the more aggressive AB 32 State-wide targets is considered conservative. Based on the foregoing, a proposed project would have a significant impact if:

GHG-1 Project-wide emissions reduction does not constitute an equivalent or larger break from BAU than has been determined by CARB to be necessary to meet AB 32's 2020 mandate (approximately 28.4 percent).

c. Project Design Features

The following design features result in a reduction in air pollutant emissions and are proposed as part of the project.

- The project would provide high density housing within a mixed-use regional center containing commercial and entertainment activities, as well as residential and office high-rise towers. The project site is located within SCAG's 2% Strategy Opportunity Area, an area identified as preferred for high density development to reduce vehicle miles traveled and related air emissions impacts, in conjunction with regional policies to achieve among other goals, a reduction in GHGs. Given, its location, the project would support pedestrian access to a considerable range of retail and entertainment activities. The project also provides excellent access to the regional transportation system as it is located in proximity to numerous bus lines and the proposed extension of the Westside subway system (Purple Line).
- All off-road diesel construction equipment remaining on-site for more than 15 work days will be retrofitted with CARB verified Level 3 diesel particulate filters (DPF) or other control devices which achieve at least 85% reduction in particulate matter emissions, if commercially available. A list of currently available CARB verified DPFs are available on the CARB website.[24]
- Baseline standards for energy efficiency would be exceeded by utilizing design methods and technologies such as passive solar design, high-performance, insulated glass, appropriately-oriented shading devices, vertical gardens to provide enhanced thermal comfort and solar control, and a planted green roof.
- Energy-saving technologies and components would be applied to reduce the project's electrical use-profile. Examples of these components include efficient/low energy light fixtures and energy efficient heating and cooling equipment.
- Energy associated with heating and cooling loads would be reduced through the use of such techniques as high-albedo (or reflective) roofing (such as light-colored, build-up "white" roofs) and/or "green" (or vegetated) roofs.
- Commissioning would be used to ensure that the project's lighting, mechanical, heating, cooling, ventilation, and other energy and water-consuming systems are operating at their designed levels of efficiency.

[24] http://www.arb.ca.gov/diesel/verdev/level3/level3.htm

- The project would be designed to meet the standards for Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council through the incorporation of green building techniques and other sustainability features.
- Trees and other landscaping would be used to shade the project's structures, open-spaces, and parking areas and as a means to capture (sequester) carbon dioxide emissions. The project includes approximately 43,141 square feet of ground-level landscaping, approximately 41 percent of the project site, and approximately 27,579 square feet of open space on a landscaped recreation deck on top of the ancillary building. It also includes additional landscaped setback areas and parkway landscaping. The ancillary building's vertical landscaping would also further reduce the heat-island effect.
- To the maximum practical extent, recyclable materials would be recycled. The project would be consistent with City strategies aimed to achieve 70 percent recycling by 2020, thus exceeding LEED™ criteria which includes: diversion of 50 percent of the construction waste from land-fills; use of recycled or recycled-content material for at least 20 percent of the project's construction material total; and use of regionally-sourced material for at least 10 percent of the project's construction. Once the project is operational, this would involve providing multiple locations for the storage and collection of recyclable materials.
- Water usage (versus "business as usual") would be reduced by implementing drip irrigation and water efficient fixtures. On-site reductions in water use would reduce the amount of energy necessary to transport the water to the site, and thus reduce the project's indirect energy demands and associated GHG emissions. Specifically, water conservation would be maximized through the use of:
    - Water efficient fixtures and appliances (e.g. high efficiency shower head toilets, and a high efficiency/demand water heater system); and
    - Specific landscaping features such as a weather-based irrigation controller with rain shutoff; matched precipitation (flow) rates for sprinkler heads; drip/microspray/subsurface irrigation where appropriate; a minimum irrigation system distribution uniformity of 75 percent; proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials; use of landscape contouring to minimize precipitation runoff; and a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.
- Electric car charging stations would be provided for tenants use.
- The project's optional automated parking system, if implemented, would further reduce GHG emissions, with construction of a smaller ancillary building and reductions in vehicle miles traveled as automobile engines are shut off at the entry to the parking structure.

d. Project Impacts

Impacts of the project on GHGs would be mostly similar for development with the Conventional Parking Option and the Automated Parking Option. For construction, both parking options would require similar excavation and grading for site preparation, similar foundation work, and substantially similar building erection programs; and the largest building component, the residential tower, would be the same. Likewise, project operations would be the same, as both would have similar site uses, and would generate the same amount of traffic.

Notwithstanding, the Automated Parking Option would reduce GHGs in two ways, as compared to the Conventional Parking Option. First, the smaller ancillary building associated with the Automated Parking Option would require a less extensive construction program with less use of natural resources, and a lower use of powered construction equipment. Second, with use of an automated parking system, vehicle engines are cut off at the entry to a garage, reducing the vehicle emissions that would normally be created by travel within a multilevel parking structure.

The following analysis focuses on the contributions of the project to GHG emissions per the more standard approach of the Conventional Parking Option. However, the use of an automated parking system would be a notable example of a project design feature that contributes to reduction of GHGs.

Construction

Emissions of GHGs were calculated for each year of construction of the proposed project and results are presented on **Table IV.E-1**, *Construction Greenhouse Gas Emissions*. To be consistent with guidance from the SCAQMD for calculating criteria pollutants from construction activities, GHG emissions from on-site construction activities and off-site hauling and construction worker commuting are considered as project-generated. Construction of the project is estimated to emit a total of 7,814 tons of CO2e over the 36 months of construction. Construction emissions have been amortized across the 30 year lifetime of the proposed project, per SCAQMD methodology. When amortized over 30 years, construction results in approximately 260 tons per year of CO_2e.

Table IV.E-1

Construction Greenhouse Gas Emissions

Emission Source	CO2e (Metric Tons)
Construction (Total – Years 2012-2015)	7,814
Construction (Amortized – 30 years)	260

Source: PCR Services Corporation, 2011

Operations

Since the project would construct more than 50,000 square feet of residential space, the project must comply with the Green Building Program, as stated above. The residential design would be required to include GHG–reduction measures that will meet the LEED™ "certified" level of performance and some such measures have been included in the quantitative analysis, such as energy efficient appliances, enhanced insulation, and low-water fixtures and efficient irrigation; as well as other features noted in the project design features above (e.g., sustainable landscape features such as selecting plant types accustomed to the Southern California climate, planting shade trees, and installing high-efficiency irrigation systems to reduce water demand).

The project is expected to be fully operational and occupied in 2016, and the annual GHG emissions for the expected opening year were calculated. However, AB 32 has not established a GHG reduction goal for 2016. Therefore, annual emissions were calculated for future operational years, 2020 and 2035, coincident with the long-term CARB and SCAG planning horizon. Project operational emissions calculated for years 2020

and 2035 take into account GHG-reducing project features in the quantitative analysis, such as improved energy efficiency, reduced water demand and improved accessibility to alternative modes of transportation (walking, biking, mass transit) as listed above. Emissions from BAU scenarios for 2020 and 2035 were also calculated.

As shown in **Table IV.E-2**, *Annual Greenhouse Gas Emissions - CO2e,* BAU GHG emissions resulting from vehicle, electrical, and natural gas usage associated with construction and operation of the proposed project was estimated to be 3,999 metric tons CO_2e for horizon year 2020. Future operational GHG emissions with GHG-reducing project features implemented for year2016 and 2020 is shown to be 2,899 and 2,598 metric tons CO_2e respectively. Although implementation of the project would result in an increase in GHG emissions as compared to existing uses (the site is currently vacant), the project as proposed results in an overall decrease in emissions when compared to similar development built without incorporation of sustainable strategies. These results demonstrate that the GHG-reducing measures to be included in the project result in a reduction in total emissions of approximately 34.6 percent for analysis year 2020 compared to similar development built in accordance with the minimum standards in place before AB 32. These reductions exceed CARB's calculated AB 32 reduction target of 28.4 percent below BAU by 2020. Therefore, the project would result in a less than significant impact with regard to GHG emissions.

Table IV.E-2

Annual Greenhouse Gas Emissions - CO_2e (tons/year)

Emission Source	Proposed Project- 2016	BAU - 2020	Proposed Project- 2020	GHG Reduction	% Reduction Below BAU
	CO_2e[e] (Metric Tons)				
Construction (amortized)	260	260	260	0	n/a
On-road Vehicles[a]	1,522	2,367	1,349	(1,018)	-43.0%
Electricity[b]	516	675	430	(245)	-36.3%
Natural gas[c]	331	389	331	(58)	-15.0%
Water Conveyance[d]	202	224	168	(56)	-25.0%
Waste [e]	59	59	59	0	0.0%
Total	**2,891**	**3,975**	**2,598**	**(1,377)**	**-34.6%**
AB-32 Reduction Target					28.5%
Meets or exceeds target?					**Yes**

[a] *Mobile source values were derived using CalEEMod. BAU emissions do not include Pavley or LCFS standards. Emissions calculated using the CARB Pavley I and Low Carbon Fuel Standard Post processor for EMFAC2007.*

[b] *Electricity Usage Rates from CalEEMod default values for Los Angeles Department of Water and Power. Proposed project emissions include CalGreen Mandatory Requirements which increases energy efficiency by 15% beyond Title 24 requirement and LADWP's improvement to meet 33% RPS target.*

[c] *Natural Gas Usage Rates from California Commercial End Use Survey (CEUS). Project related emissions include CALGreen requirements.*

[d] *Water conveyance energy rates from California Energy Commission Staff Report: California's Water - Energy Relationship. 2007. Project related electricity emission factors include 33% RPS. Reduction in water demand due to project design features not quantified.*

[c] *Reduction in trash generation not quantified. Project would be consistent with City and regional initiatives.*

Source: PCR Services Corporation, 2011

As described above, this GHG analysis was performed in accordance with SCAQMD and CARB guidance. Due to the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that the project's emissions increase could actually cause a measurable increase in global GHG emissions necessary to influence global climate change. Newer construction materials and practices, current energy efficiency requirements, and newer appliances tend to emit lower levels of air pollutant emissions, including GHGs, as compared to those built years ago, but the net effect is difficult to quantify. Thus, the estimated net increase in emissions resulting from implementation of the proposed project presented above may be an over- or under-estimation. The GHG emissions of the project alone would not likely cause a direct physical change in the environment. It is global emissions in their aggregate that contribute to climate change, not any one source of emissions alone. Therefore, due to the incremental amount of GHG emissions estimated for this project, the lack of any evidence for concluding that the project's GHG emissions could cause any measurable increase in global GHG emissions necessary to force global climate change, and the fact that the project incorporates design features to reduce potential GHG emissions, the project is considered consistent with AB 32.

It is difficult to estimate what portion of new GHG emissions versus existing displaced emissions. Displaced emissions are those that are created and emitted elsewhere prior to project implementation, whereas new GHG emissions are those that do not and would not exist without implementation of the project, creating a true incremental increase in emissions. This project would provide housing to accommodate the projected increase in demand for housing within the region. Those who would occupy the new residences already generate GHG emissions through their current activities elsewhere, and any net increase in such emissions with their relocation to the site would depend on the nature of their current activities, such as the distance of their commute, the energy demand associated with their current residences, and other factors. Accordingly, it is conservatively assumed that all project-related operational emissions are new. Assuming all project-related operational emissions are new is a conservative approach that likely overstates to some undeterminable extent the amount of any truly "new" emissions.

The project is designed with a number of features that are consistent with the following City of Los Angeles goals:[25]

- Improving energy and water efficiency in buildings
- Reducing water per capita water use; and
- Increasing recycling rates to 70 percent by 2015, and eventually "zero waste"

The following planned City actions, as presented in the *LA Green Plan*, when implemented, may further decrease emissions of GHGs from the proposed project:

- Decreasing emissions from Department of Water and Power electrical generation and import activities;
- Providing compact fluorescent light (CFL) bulbs to encourage acceptance and use of CFLs; and
- Expanding the regional rail network to reduce VMT.

[25] *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming, City of Los Angeles, May 2007.*

In addition, the project is designed with a number of "Smart Growth" features which are consistent with the following City of Los Angeles goals:

- Increasing the use of energy efficient appliances and equipment;
- Promoting high-density housing close to mass transportation and employment centers; and
- Creating walkable neighborhoods.

Specific project features will further reduce GHG emissions. As discussed above, the project would be constructed in a manner consistent with a USGBC's LEED™ program, with building efficiency measures to reduce energy consumption, and water saving measures. The effectiveness in reducing GHG emissions of each of the project features varies. High performance windows can reduce energy demand for heating and cooling by over 20 percent per year.[26] Trees planted on the project site as part of the planned landscaping are able to sequester more carbon dioxide as they age and the average tree can sequester 330 pounds of carbon dioxide from the atmosphere every year. A heat island effect mitigating roof can either be painted a color that reflects much of the sun's heat, such as white, or be a "green roof," also known as a living roof. The project's vertical landscaping on the ancillary building would also contribute to this affect. A living roof can reduce air temperatures and reduce the need for heating and cooling within the building. Reducing water consumption results in a reduction of GHG emissions from energy generation to operate water pumps and wastewater treatment facilities, which have been identified as major sources of GHGs statewide. Low flow faucets and showers use up to 50 percent less water than their counterparts, while low flow toilets use approximately 70 percent less water than traditional toilets.[27] Notably, such reductions in GHGs conservatively are not reflected in the reductions of GHG emissions from BAU levels shown in Table IV.E-2, above. Accordingly, actual project emissions likely are lower than represented herein and the break from BAU likely is greater.

As mentioned above, the project contains several GHG-reducing design features consistent with the LA Green Plan and the City's Green Building Ordinance. However, as of June 2011, the City of Los Angeles has not yet developed a Greenhouse Gas Reduction Plan that meets the requirements set forth in the latest OPR CEQA Guidelines. The project will employ project design features that are intended to achieve the standards of LEED™ certification, result in GHG emissions consistent with AB 32 reduction targets, and incorporate water conservation, energy conservation, tree-planting, and other features consistent with CALGreen regulations and the *LA Green Plan*. Therefore, the proposed project would not conflict with any applicable plan, policy, or regulation to reduce GHG emissions.

4. CUMULATIVE IMPACTS

Unlike the cumulative analyses for many topics that address the combined impacts of a proposed project in addition to related projects in a project area, global climate change is affected by a larger range of development activity Although the State requires Metropolitan Planning Organizations and other planning agencies to consider how region-wide planning decisions can impact global climate change, there is currently

[26] *Efficient Windows Collaborative, Annual Energy Use by Window Type in Los Angeles, CA. http://www.efficientwindows.org/city_all.cfm?new=N&prodtype=WN&id=4 .*

[27] *Energy Efficient Rehab Advisor, Low Flow Fixtures, July 2004. http://rehabadvisor.pathnet.org/ sp.asp?id=9414.*

no established non-speculative method to assess the cumulative impact of proposed independent private-party development projects.

Although AB 32 sets a state-wide target for 2020 GHG emissions which equates to approximately 28.4 percent below state-wide BAU emissions, the Scoping plan and other implementing tools of the law are clear that the reductions are not expected to occur uniformly from all sources or sectors. CARB has set targets specific to the transportation sector, for example, and under SB 375 SCAG must incorporate these GHG-reduction goals into the next Regional Transportation Plan (RTP) and demonstrate that its Sustainable Communities Strategies (or alternative planning strategy) is consistent with the Regional Housing Needs Assessment (RHNA). One of the goals of this process is to ensure that the efforts of State, regional and local planning agencies accommodate the contemporaneous increase in population and employment with a decrease in overall GHG emissions. For example, adopting zoning designations that reduce density in areas which are expected to experience growth in population and housing needs is seen as inconsistent with anti-sprawl goals of sustainable planning. Although development under a reduced density scenario results in lower GHG emissions from the use of that land compared to what is currently or hypothetically allowed (e.g., by creating fewer units and fewer attributable vehicle trips), total regional GHG emissions will likely fail to decrease at the desired rate or, worse, increase if regional housing and employment needs of an area are met with a larger number of less-intensive development projects. Therefore, it is not simply a cumulative increase in regional development or the resultant GHG emissions that threatens GHG reduction goals.

The land-use sector can accommodate growth and still be consistent with State-wide plans to reduce GHG emissions. To that end, various agencies are required to develop programs to guide future building and transportation development towards minimized resource consumption and lowered resultant pollution. As discussed above, the City of Los Angeles has developed its Green Building Ordinance and the State's CALGreen standards are now mandatory. However, the specific options applicable to and chosen by each individual project developer, and their efficacy in reducing GHG emissions, vary widely. It should also be noted that SCAG is not expected to complete its Sustainable Communities Strategy until May 2012.

As indicated above, there exist numerous options for project developers to reduce their contribution to city-, county-, and State-wide GHG emissions, while helping to meet the region's future housing, jobs, and infrastructure needs. It is expected that other private development projects would include measures to reduce GHG emissions in compliance with applicable policies. Further, in addition to project specific items, there are CALGreen requirements that apply to all projects; and policies that address larger scale strategies such as reducing GHG emissions from automobiles, use of alternative fuels, performance standards for power plants, etc.

It is not possible at this time to accurately quantify GHG emissions expected from related projects or all of the GHG reductions anticipated from the above-discussed strategies. Because of the complex physical, chemical and atmospheric mechanisms involved in global climate change, there is no basis for concluding that an emissions increase resulting from the project and related projects could actually cause a measurable increase in global GHG emissions sufficient to force global climate change.

As indicated above, the proposed project would be consistent with State and City goals, and result in a GHG emission profile that reduces emissions 34.6 percent as compared to BAU, exceeding the AB 32 reduction target of 28.5 percent reduction by 2020. The project would include numerous project design features to

reduce GHG emissions, most notably the project's addition of a high density housing project within Century City and within SCAG's 2% Strategy Opportunity Area that defines areas for high density, mixed-use, transit adjacent development so as to contribute to reductions of GHG emissions. The project would place high density housing within walking distance of employment, commercial/service, and entertainment opportunities. In addition, the project design includes numerous design/LEED certification features to reduce emissions, as well as features that address strategies included in CalGreen, and LA Green Plan for reducing GHG emissions. Therefore, the project's contribution to cumulative GHG emissions would not be cumulatively considerable, and the project's cumulative impacts would be less than significant.

5. MITIGATION MEASURES

Construction and operational GHG emissions from the proposed project would meet AB 32 reduction targets. In addition, the project would be consistent with the *LA Green Plan* and the Green Building Ordinance. With implementation of the proposed project design features, project construction and operation would result in less than significant impacts. No mitigation measures are required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

As indicated above, the project would not have significant impacts on GHG emissions, and no mitigation measures would be required.

IV. ENVIRONMENTAL IMPACT ANALYSIS
F. HAZARDS AND HAZARDOUS MATERIALS

1. INTRODUCTION

This section provides an analysis of potential impacts associated with hazards and hazardous materials that could occur with implementation of the proposed project. The analysis considers the potential impacts associated with the historical uses of the project site, the transport, use, or disposal of hazardous materials that could occur during construction and operation of the project, as well as the location of the project site within a City-designated methane zone. The analysis also considers potential impacts to the future residents of the project with regard to hazards from materials generated by land uses in the project vicinity.

Two other hazards related topics are addressed elsewhere in the Draft EIR. Impacts associated with emergency response and evacuations are discussed in Section IV.H.1, Fire Protection. Impacts associated with groundwater are discussed in Section IV.E, Hydrology and Water Quality.

The analysis below is based on a Phase I Environmental Site Assessment (Phase I), a Report of Methane Soil Gas Assessment, and an Airspace Obstruction Report.[1] These reports are provided in Appendix E of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) Hazardous Materials Management

The use, storage, and disposal of hazardous materials are subject to Federal, State, and local regulations as further discussed below.

The Federal Resource Conservation and Recovery Act (RCRA) (42 U.S.C. secs. 6901-6992k) regulates the generation, transportation, treatment, storage, and disposal of hazardous waste. Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA.

RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as it is at least as stringent as RCRA. The State of California has developed the California Hazardous Waste Control Law (HWCL) (Health and Safety Code sec. 25100 et seq. and 22 California Code of Regulations [CCR]

[1] *Phase I Environmental Site Assessment of 10000 Santa Monica Boulevard, Los Angeles, California, ENVIRON April, 2011; Report of Methane Soil Gas Assessment, 10000 Santa Monica Boulevard, Los Angeles, California, Environ, August 2011; FAR Part 77 Airspace Obstruction Report prepared by Aviation Systems, May 6, 2011.*

sec. 66260.1 et seq.) and the U.S. Environmental Protection Agency (USEPA) has authorized RCRA enforcement to the State of California. Primary authority for the statewide administration and enforcement of HWCL rests with California EPA's (Cal-EPA) Department of Toxic Substances Control (DTSC).

The Federal Occupational Safety and Health Act of 1970, which is implemented by the Federal Occupational Safety and Health Administration (OSHA), contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in 29 Code of Federal Regulations (CFR) Section 1910, et. seq., are designed to promote worker safety, worker training, and a worker's right–to-know.

The U.S. Department of Labor has delegated the authority to administer OSHA regulations to the State of California. The California OSHA program (Cal-OSHA) (codified in the CCR, Title 8, or 8 CCR generally and in the Labor Code secs. 6300-6719) is administered and enforced by the Division of Occupational Safety and Health (DOSH). Cal-OSHA is very similar to the Federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal-OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (IIPP). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

The Safe Drinking Water and Toxic Enforcement Act (22 CCR sec. 12000 et seq.), better known as Proposition 65, lists chemicals and substances believed to have the potential to cause cancer or deleterious reproductive effects in humans, restricts the discharges of listed chemicals into known drinking water sources at levels above the regulatory levels of concern, requires public notification of any unauthorized discharge of hazardous waste, and requires that a clear and understandable warning be given prior to a known and intentional exposure to a listed substance.

At the local level, the City of Los Angeles Fire Department (LAFD) monitors the storage of hazardous materials for compliance with local requirements. Specifically, businesses and facilities that store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also issues permits for hazardous materials handling and enforces California's Hazardous Materials Release Response Plans and Inventory Law (Health and Safety Code sec. 25500 et seq.). Basic requirements of California's Hazardous Materials Release Response Plans and Inventory Law include the development of detailed hazardous materials inventories used and stored on-site, a program of employee training for hazardous materials release response, identification of emergency contacts and response procedures, and reporting of releases of hazardous materials. Any facility that meets the minimum reporting thresholds must comply with the reporting requirements and file a Business Emergency Plan (BEP) with the local administering agency. The LAFD also administers the applicable sections of the Los Angeles City Fire Code, including Division 8, Hazardous Materials Disclosures. Those businesses that store hazardous waste or hazardous materials must submit a Certificate of Disclosure to the LAFD.

(2) Oil and Gas Fields

The California Division of Oil, Gas and Geothermal Resources (DOGGR) is the State agency responsible for the oversight of drilling, operation, maintenance, plugging and abandonment of gas, oil and geothermal wells.

DOGGR established a regulatory program for the management of these resources, emphasizing their responsible development through sound engineering practices that protect the environment, prevent pollution and ensure public safety. DOGGR recommends that construction of buildings over or in the proximity of plugged and abandoned oil wells should be avoided, and if not feasible, then plugging or re-plugging wells should be performed to current DOGGR standards. The State Oil and Gas Supervisor can require the re-abandonment of previously plugged or abandoned wells, when construction will be taking place over or in the vicinity of a well is considered to result in a hazard.

(3) Methane Gas

At very high concentrations, methane can act as an asphyxiant by reducing the relative concentration of oxygen in the air that is inhaled. Methane is odorless, colorless, and extremely flammable. The concentration threshold resulting in a fire from methane is referred to as the lower explosive limit (LEL), which, for methane, is approximately 5 percent or 50,000 parts per million by volume (ppmv). The upper explosive limit (UEL) is the maximum concentration of methane that can be present in air and still permit combustion or explosion to occur. The UEL for methane is approximately 15 percent or 150,000 ppmv. Consequently, if the concentration of methane is 5 percent or greater but less than 15 percent, the primary safety risk posed by methane is a risk of fire or explosion. Methane is not toxic.

Methane has the potential to migrate into buildings through physical pathways that include cracks in concrete floor slabs, unsealed conduits or utility trenches, unsealed dewatering sumps, and other small openings common in building construction. Methane gas can also reach the surface through natural geologic features which may facilitate vertical, lateral, or oblique migration. The geologic features that can serve as potential pathways include porous and permeable formations, fault zones, and aquifers.

Worker exposure to methane is regulated by OSHA under 29 CFR §1910.146. This section regulates worker exposure to a "hazardous atmosphere" within confined spaces where the presence of flammable gas vapor or mist is in excess of 10 percent of the lower explosive limit. The Cal-OSHA program regulates worker exposure to airborne contaminants (such as hydrogen sulfide) during construction under Title 8, Section 5155, Airborne Contaminants, which establishes which compounds are considered a health risk, the exposure limits associated with such compounds, protective equipment, workplace monitoring, and medical surveillance required for compliance.

Los Angeles Municipal Code (LAMC), Chapter IX, Article 1, Division 71, Section 91.7103, also known as the Los Angeles Methane Seepage Regulations, provides requirements for buildings and paved areas located in areas classified as being located either in a methane zone or a methane buffer zone. Requirements for new construction within such zones include methane gas sampling and, depending on the detected concentrations of methane and gas pressure at the site, installing a barrier (i.e., a membrane shield) between the building and underlying earth, installing a vent system(s) beneath the barrier and/or within the building, and installing a gas (methane) detection system as required by the Los Angeles Department of Building Safety (LADBS).

The Methane Seepage Regulations base the required methane mitigation system on the Site Design Level. There are five site design levels based on the methane concentration at a project site. Level I is applicable to concentration levels of 0 – 100 parts per million by volume (ppmv). Level II is applicable to concentrations of 101 – 1,000 ppmv. And so on to Level V for concentrations greater than 12,000 pppv.

(4) Airport Safety Provisions

The Federal Aviation Administration (FAA) has established an advisory circular with regard to safety concerns associated with the construction of high-rise buildings since such buildings may present a hazard to aircraft operations.[2] This requirement is in effect for buildings with a height of over 200 feet above ground level (AGL) at the object site.[3] In this regard, Federal Aviation Regulations (FAR) Part 77, Objects Affecting Navigable Airspace, establishes minimum standards to ensure air safety by regulating the construction or alteration of buildings or structures that may affect airport operations.[4]

The FAA requires that Form 7460-1, Notice of Proposed Construction or Alteration be filed with the FAA regional office prior to construction for buildings that are 200 feet or greater in height from the grading terrain. In addition, generally any structure that exceeds an overall height of 200 feet AGL should be marked and/or lighted.[5] However, the determination is made by FAA and depends on terrain features, weather patterns, geographic location, number of structures, and overall layout of design.[6]

b. Historical Conditions

The project site has been used historically for a variety of uses, including a golf clubhouse since at least 1927 to the mid 1940s and as a "Union Oil salesroom and portable island," which was constructed on the site in 1930. In the mid 1940s, the site became the northeastern corner of the Fox Film Corporation facility (the majority of which is located to the southwest of the site) and the building was used as a stationary and print shop. A small road or train/tram line connected the site with other portions of the Fox Film Corporation during this time period. Because detailed information regarding historical activities and chemical usage at the site is limited, the Phase I Environmental Site Assessment indicates that past storage, use, and/or disposal of chemicals that may have adversely affected subsurface conditions at the site, cannot be ruled out. However, given the time that has elapsed since the site was occupied by the aforementioned businesses (more than 50 years); because the site has undergone redevelopment on two occasions, during which it is likely that any subsurface features or impacted soil would have been removed as part of that effort; because there is no known history of spills or reported releases at the site; and, because the site is not listed on any data bases indicative of an environmental concern, it appears that the potential for subsurface impact from historical operations at the site is low.

c. Existing Conditions

The project site is currently vacant and has been graded and enclosed with construction fencing. As further discussed below, no hazardous materials are known to exist on-site. Due to the project site's location within the Beverly Hills Oil Field, the project site is located within a City-designated methane zone.[7] According to Division of Oil, Gas, and Geothermal Resources (DOGGR) Map 117, no oil wells are located directly on the project site.[8] The closest oil well, Chevron U.S.A. Inc. "Wolfskill" 1, is located south of the project site. This oil

2 *FAA Advisory Circular 70/7460-1K (August 1, 2000, updated February 1, 2007).*
3 *Ibid.*
4 *14 C.F.R. Part 77 (2001).*
5 *FAA Advisory Circular 70/7460-1K (August 1, 2000, updated February 1, 2007).*
6 *Ibid.*
7 *City of Los Angeles Department of Public Works, Methane Ordinance Map A-20960. City Ordinance No. 175,790 dated February 4, 2004.*
8 *Division of Oil, Gas, and Geothermal Resources, Map 117, dated October 17, 2006.*

well is plugged and abandoned. There are no leaking underground storage tanks or other hazardous material conditions/incidents in the immediate site vicinity that would have effects on the project site.

3. PROJECT IMPACTS

a. Methodology

To assist in evaluating potential impacts associated with hazards and hazardous materials that would occur from construction and/or operation of the proposed project, several reports were prepared. A Phase I Environmental Site Assessment was conducted to identify the potential for hazardous materials on the basis of a site/survey, visual observation, review of historical information, review of regulatory agency databases and files, and review of previously prepared Phase I Reports pertaining to the project site. A Report of Methane Gas Assessment addressed the project's site conditions regarding methane on the basis of methane boring tests at the project site. An Airspace Obstruction Report was reviewed that identified height considerations pertaining to existing airports and requirements to meet FAA Guidelines applicable to the proposed project. The findings of the various reports and data base searches were reviewed to identify the potential hazardous impacts for construction and/or operation of the proposed project.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides screening questions that address impacts with regard to hazards and hazardous materials. These questions are as follows:

Would the project:

- Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment?
- Reasonably be anticipated to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
- Is the project located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
- For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
- Expose people or structures to the risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

In the context of these questions from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide (2006)* states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

(1) Risk of Upset/Emergency Preparedness

- Compliance with the regulatory framework;
- The probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance;
- The degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and
- The degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance.

(2) Human Health Hazards

- Compliance with the regulatory framework for the health hazard;
- The probable frequency and severity of consequences to people from exposure to the health hazard; and
- The degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

Based on these factors, the proposed project would be considered to have a significant risk of upset/emergency preparedness or human health hazard impact if:

HZ-1 It does not comply with applicable regulations regarding the handling and storage of hazardous materials; it would consistently increase interference with existing emergency response capacity to the project area over existing conditions; or it would expose persons to substantial risk resulting from the release of hazardous materials or from exposure to a health hazard in excess of regulatory standards.

c. Analysis of Project Impacts

The project would require excavation that would expose workers and the public to the existing site conditions, and also provide the construction of a building within the City-designated methane zone. Project impacts would be the same with the Conventional Parking Option and Automated Parking Option. Both options require the same excavation, and both options have similar ground level site sections.

(1) Historical Use of Project Site

As indicated above, it appears that the potential for subsurface impact from historical operations at the site is low. However, historical use of the project site could pose a concern if contamination occurred in association with the former Union Oil Company portable island that occupied the site in the 1930s, or the former Twentieth Century Fox Film Corporation stationary and print shop that occupied the site in the 1940s and 1950s. No agency records were found regarding these former uses. Therefore, Mitigation Measure D-1 below is recommended in the event contamination is found during excavation and grading.

(2) Hazardous Materials Management

Construction of the proposed project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Furthermore, any emissions from the use of such materials would be minimal and localized to the project site. Therefore, construction of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No mitigation measures are required.

The proposed project consists of the development of residential units and associated amenities. No hazardous materials would be utilized during day-to-day operation of the proposed project other than typical household, vehicle, and landscape maintenance materials (i.e., cleaning supplies, paints, oil, grease, fertilizers). The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, operation of the proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. No mitigation measures are required.

(3) Methane Gas

The project site is located within a designated methane zone under the Los Angeles Methane Seepage Regulations and is therefore subject to soil gas testing and implementation of a methane mitigation system pursuant to the regulations. The methane zone covers a large area that includes, and extends well beyond Century City and is akin to methane zones located throughout the City. Accordingly, soil gas testing was conducted at the project site in accordance with LADBS Methane Mitigation Standards. Gas sampling probes were installed at 10 locations on the project site. Methane was detected at levels above the laboratory reporting limit (RL) of 10 ppmv at four locations, with a maximum reading of 39 ppmv. On the bases of the shallow tests, additional gas probe tests were performed at four locations with assessments of methane at depths of five feet, ten feet and twenty feet. The detected methane concentrations of the gas probe tests ranged from 24 ppmv to 120 ppmv.

Based on the results of the soil gas testing conducted at the project site (maximum concentration of 120 ppmv), the project would likely be required to comply with Site Design Level II of the City's Methane Seepage Regulations, which is applicable to sites with methane concentrations between 101 ppmv and 1,000 ppmv. Pursuant to the methane regulations and site methane report, the methane mitigation system would require installation of a passive methane venting system, trench dams and conduit and cable seal fittings, etc. Design of the methane mitigation system would be confirmed by the LADBS prior to the issuance of building permits for the project. Mitigation Measure D-2 below ensures compliance with the City regulations. Also, Mitigation Measure D-3 has been included below to protect construction workers from methane exposure during the excavation of the project site. Therefore, potentially significant impacts from methane gas would be reduced to a less than significant level.

(4) Airport Safety Provisions

As described previously, FAR Part 77, Objects Affecting Navigable Airspace, establishes minimum standards to ensure air safety by regulating the construction or alteration of buildings or structures that may affect airport operations. The FAA requires that Form 7460-1, Notice of Proposed Construction or Alteration be

filed with the FAA regional office prior to construction for buildings that are 200 feet or greater in height from the grading terrain. In addition, generally any structure that exceeds an overall height of 200 feet AGL should be marked and/or lighted. However, the determination is made by FAA and depends on terrain features, weather patterns, geographic location, number of structures, and overall layout of design.

The project site is located within the primary area of the instrument approach to the Santa Monica Municipal Airport and within the Visual Flight Rule (VFR) Traffic Pattern Airspace. The technical height limit for the project site should be 265 feet AGL.[9] However, there are numerous other buildings in close proximity to the project site that exceed the technical height limit, such as a building located approximately 0.32 mile south that is 589 feet AGL. Based on a preliminary aviation study, a structure from 238 to 608 feet AGL should be approvable but would require extended study. The finished height of the proposed project's residential building would be approximately 460 feet AGL (including the horizontal plane). As such, the Applicant would file the appropriate forms subject to the approval of the FAA to ensure that the project would not result in significant impacts relative to airport safety. As a result, compliance with FAA guidelines would reduce potentially significant impacts to a less than significant level.

4. CUMULATIVE IMPACTS

All development located within the vicinity of the project site would be subject to the same local, regional, State, and Federal regulations pertaining to hazards and hazardous materials. Therefore, with adherence to such regulations, the simultaneous development of the proposed project and related projects would not result in cumulatively significant impacts with regard to hazards and hazardous materials.

5. MITIGATION MEASURES

Mitigation Measure F-1: If visual or olfactory indication of contamination is discovered during excavation or grading on-site, such activities shall be temporarily halted and redirected around the area. The City of Los Angeles and appropriate regulatory agencies shall be notified and the appropriate evaluation and response measures implemented so as to render the area suitable for excavation and grading activities to resume.

Mitigation Measure F-2: Prior to issuance of a building permit, the Applicant shall demonstrate compliance with Los Angeles Department of Building and Safety (LADBS) Methane Mitigation Standards for the appropriate Site Design Level pursuant to the City's Methane Seepage Regulations and to the satisfaction of the LADBS.

Mitigation Measure F-3: During subsurface excavation activities, including borings, trenching, and grading, Cal-OSHA worker safety measures shall be implemented as required to preclude an exposure to unsafe levels of soil gases, including but not limited to methane.

[9] *FAR Part 77 Airspace Obstruction Report prepared by Aviation Systems, Appendix E.1 of the Draft EIR.*

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

All potentially significant impacts would be less than significant, with implementation of the mitigation measure outlined above.

IV. ENVIRONMENTAL IMPACT ANALYSIS
G. HYDROLOGY AND WATER QUALITY

1. INTRODUCTION

This section provides an analysis of the project's potential impacts associated with hydrology (including groundwater) and water quality. The analysis is based on a Hydrology/Water Quality Report prepared by SEC Civil Engineers, and a Geotechnical Investigationprepared by Feffer Geological Consulting.[1] The reports are provided in Appendix F and Appendix D of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

Regulatory and permitting processes have been established to control the quality of surface water runoff during construction and operation of development projects. In 1972, the Federal Water Pollution Control Act, also referred to as the Clean Water Act (CWA), was amended to provide that the discharge of pollutants into waters of the U.S. from any point source is unlawful, unless a National Pollutant Discharge Elimination System (NPDES) permit authorizes the discharge. The CWA was amended in 1987 requiring the U.S. Environmental Protection Agency (USEPA) to create specific requirements for discharges. In response to the 1987 amendments to the CWA, Phase I of the USEPA NPDES Program required NPDES permits for: (1) municipal separate storm sewer systems generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) eleven specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. As of March 2003, Phase II of the NPDES Program extends the requirements for NPDES permits to numerous small municipal separate storm sewer systems, construction sites of one to five acres, and industrial facilities owned or operated by small municipal separate storm sewer systems, which were previously exempted from permitting.

Total Maximum Daily Load

The CWA requires states to adopt water quality standards for receiving water bodies and to have those standards approved by the USEPA. Water quality standards consist of designated beneficial uses for a particular receiving water body (e.g., wildlife habitat, agricultural supply, fishing, etc.), along with water quality criteria necessary to support those uses. Water quality criteria are either prescribed concentrations or levels of constituents such as lead, suspended sediment, and fecal coliform bacteria, or narrative statements which represent the quality of water that support a particular use.

When designated beneficial uses of a particular receiving water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as "impaired." Once a water body has been deemed impaired, a Total Maximum Daily Load (TMDL) must be developed for the

[1] *Hydrology/Water Quality Study, SEC Civil Engineers, May 2011; and Geotechnical Investigation, New Construction, 10000 Santa Monica Boulevard, Los Angeles California, Joshua R Feffer and Jon A Irvine, Feffer Geological Consulting, June 8, 2011.*

impairing pollutant(s). A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (with a "factor of safety" included). Once established, the TMDL allocates the loads among current and future pollutant sources to the water body.

The CWA requires states to publish, every two years, an updated list of streams and lakes that are not meeting their designated uses because of excess pollutants (i.e., impaired water bodies). The list, known as the "303(d) list", is based on violations of water quality standards. Once a TMDL is developed and adopted, the water quality limited section is removed from the 303(d) list.

Porter-Cologne Water Quality Control Act

The CWA places the primary responsibility for the control of surface water pollution and for planning the development and use of water resources with the states, establishing certain guidelines for the states to follow in developing these programs. It also allows the USEPA to withdraw control from the states if their implementation mechanisms are found to be inadequate. In California, the NPDES program is administered by the State Water Resources Control Board (SWRCB) through nine Regional Water Quality Control Boards (RWQCB). The SWRCB and the RWQCBs were established in 1969 by the Porter-Cologne Water Quality Control Act, the principal law governing water quality regulation in California. The Porter-Cologne Act grants the SWRCB and the RWQCBs authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites and to require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act, which is embodied in the California Water Code, also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, or oil or petroleum products. Each RWQCB must formulate and adopt a Water Quality Control Plan (Basin Plan) for its region. The regional plans are to conform to the policies set forth in the Porter-Cologne Act and by the SWRCB in its state water policy. The Porter-Cologne Act also provides that a RWQCB may include within its regional plan water discharge prohibitions applicable to particular conditions, areas, or types of waste. The proposed project site is located in Region 4, also known as the Los Angeles Region, and is governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

Construction General Permit

Section 402 (p) of the CWA mandates that municipal permits must: (1) effectively prohibit the discharges of non-stormwater to the system except under certain provisions; and (2) require controls to reduce pollutants in discharges from the system to the maximum extent practicable, including Best Management Practices (BMPs), control techniques, and system, design, and engineering methods.

A municipal permit was issued to the County of Los Angeles and 84 incorporated cities (with the exception of the City of Long Beach), including the City of Los Angeles, in December 2001.[2] To meet the Los Angeles County municipal permit requirements, municipalities are required to implement the Storm Water Quality Management Program that was prepared as part of the Report of Waste Discharge filed as part of the NPDES approval process. Pursuant to this program, municipalities, including the City of Los Angeles, are required to conduct a variety of activities including, but not limited to, the following:

[2] *County of Los Angeles Municipal Permit (NPDES No. CAS004001, Order No 01-182).*

- Implement a public information and participation program to conduct outreach on stormwater pollution;
- Control discharges at commercial/industrial facilities through tracking, inspecting, and ensuring compliance at facilities that are critical sources of pollutants;
- Implement a development planning program for specified development projects;
- Implement a program to control construction runoff from construction activity at all construction sites within its jurisdiction;
- Implement a public agency activities program to minimize stormwater pollution impacts from public agency activities; and
- Implement a program to document, track, and report illicit connections and discharges to the storm drain system.

In accordance with the Los Angeles County municipal permit requirements, the City of Los Angeles has developed and completed several programs and activities, including the adoption of ordinances relating to regulation and completion of the *Development Best Management Practices Handbook* regarding both construction (Part A) and planning (Part B) activities. An April 27, 2011 working draft of an updated handbook is available for public review.[3]

(1) Construction

The California General Construction Activity Permit, adopted by the SWRCB regulates construction activity that includes clearing, grading, and excavation resulting in soil disturbance of at least one acre of total land area.[4] This general permit authorizes the discharge of stormwater to surface waters from construction activities. It prohibits the discharge of materials other than stormwater and authorized non-stormwater discharges and all discharges that contain a hazardous substance in excess of reportable quantities established in 40 Code of Federal Regulations (CFR) 117.3 and 40 CFR 302.4 unless a separate NPDES permit has been issued to regulate those discharges. The NPDES General Construction Activity Permit requires that all developers of land where construction activities will occur over more than one acre do the following:

- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the nation;
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP), which specifies BMPs that will reduce pollution in stormwater discharges to the Best Available Technology Economically Achievable/Best Conventional Pollutant Control Technology standards; and
- Perform inspections and maintenance of all BMPs.

In order to obtain coverage under the NPDES General Construction Activity Permit, a project applicant must submit a Notice of Intent (NOI) to the RWQCB and prepare a SWPPP. BMPs within the SWPPP typically address minimization of erosion during construction, stabilization of construction areas, sediment control, control of pollutants from construction materials, as well as post-construction management (e.g., the

[3] *http://www.lastormwater.org/siteorg/program/LID/LALID_HandbookDraft_PartB.pdf, accessed May 2011.*

minimization of impermeable surfaces, treatment of runoff, etc.). The SWPPP must also include a discussion of the program to inspect and maintain all BMPs.

The City of Los Angeles *Development Best Management Practices Handbook, Part A Construction Activities,* Third Edition, adopted by the City of Los Angeles Department of Public Works in September 2004, and associated ordinances also have specific minimum BMP requirements for all construction activities and require that construction projects with one acre and greater of disturbed soil require the preparation of a SWPPP and filing of a NOI with the SWRCB to comply with the California NPDES General Construction Activity Permit.

(2) Operation

As discussed above, the Los Angeles County NPDES permit requires municipalities to implement a development planning program to address stormwater pollution by requiring individual projects to prepare a permanent Standard Urban Stormwater Mitigation Plan (SUSMP). Under new regulations adopted by the LARWQCB, project applicants for certain types of projects will be required to implement SUSMP requirements for the operational life of the project to ensure that stormwater pollution is addressed by incorporating BMPs in the design phase of development. The City of Los Angeles has incorporated these requirements into *Part B Planning Activities, of the Development Best Management Practices Handbook, cited above.* Compliance with the requirements of this manual for residential projects is required by City of Los Angeles Ordinance No. 173,494.

The SUSMP provisions that are applicable to housing developments include: (1) reducing peak runoff discharge rates; (2) conserving natural areas; (3) minimizing stormwater pollutants of concern; (4) protecting slopes and channels; (5) providing storm drain stenciling and signage; (6) properly designing outdoor material storage areas; (7) providing proof of on-going BMP maintenance; and (8) designing standards for structural or treatment control BMPs. In addition, project applicants for these projects will be required to select source control and, in most cases, treatment control BMPs from the list approved by the RWQCB and included in the SUSMP. In combination, these treatment control BMPs must be sufficiently designed and constructed to treat, infiltrate, or filter stormwater runoff from one of the following:

- The 85th percentile 24-hour runoff event determined as the maximized capture stormwater volume for the area, from the formula recommended in Urban Runoff Quality Management, WEF Manual of Practice No. 23/ASCE Manual of Practice No. 87, (1998); [5]
- The volume of annual runoff based on unit basin storage water quality volume, to achieve 80 percent or more volume treatment by the method recommended in California Stormwater Best Management Practices Handbook—Industrial/Commercial, (1993);
- The volume of runoff produced from a 0.75-inch storm event, prior to its discharge to a stormwater conveyance system; or

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[4] *State Water Resources Control Board NPDES General Permit for Discharges Associated with Construction Activity (Water Quality Order No. 99-08-DWQ).*

[5] *A 24-hour runoff event is defined as the amount of runoff one could expect during a 24-hour period. 85th percentile refers to 85% of the events that occur.*

- The volume of runoff produced from a historical-record based reference 24-hour rainfall criterion for "treatment" (0.75-inch average for the Los Angeles County area) that achieves approximately the same reduction in pollutant loads achieved by the 85th percentile 24-hour runoff event.

In addition, the BMPs must control peak flow discharge to provide stream channel and over bank flood protection, based on flow design criteria selected by the local agency.

The Los Angeles County Department of Public Works also requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of the storm drain and street flow be able to convey a 50-year storm event. In areas with a sump (high groundwater in which dewatering pumping is required), the storm drain conveyance system shall be designed for a 50-year storm event.[6] As set forth in Section 62.105 of the Los Angeles Municipal Code (LAMC), a B permit is required for any proposed drainage improvements including the installation of storm drains, within the street right of way or any other property owned by, to be owned by, or under the control of the City. As part of the B-permit process, storm drain installation plans are subject to review and approval by the City of Los Angeles Department of Public Works Bureau of Engineering.

b. Existing Conditions

The project site lies within the nine-mile long, 130-square mile Ballona Creek Watershed, which is bound by the Santa Monica Mountains on the north, State Highway 110 (Harbor Freeway) to the east, Baldwin Hills to the south, and the City of Santa Monica to the west. Stormwater that does not percolate into the ground is directed via an array of storm drains into major tributaries including Centinela Creek, Sepulveda Canyon Channel, and Benedict Canyon Channel. The Ballona Creek Watershed eventually discharges into Santa Monica Bay. During a 50-year storm event, the watershed is designed to discharge to Santa Monica Bay at approximately 71,400 cubic feet per second. In addition to the Century City community, the watershed is also comprised of various parts of the cities of Beverly Hills, Inglewood, Santa Monica, West Hollywood, Culver City, Los Angeles and unincorporated Los Angeles.

The project site is proximate to the Benedict Canyon Drainage System. The system drains approximately 10,600 acres that are bounded roughly by the Santa Monica Mountains to the north, the community of Westwood to the east, the City of Culver City to the south, and the City of Beverly Hills, which is just outside of Century City to the west. Storm water conveyed by this system eventually enters the Ballona Creek Channel at Madison Avenue in Culver City.[7]

The project site consists of a relatively flat, 2.4-acre parcel of land. It is undeveloped (vacant) and graded with pervious surfaces comprising approximately 100 percent of the site. To estimate the existing runoff rates at the project site, hydrology calculations were performed using the Los Angeles County of Public Works 2006 Hydrology Manual. During a 50-year storm event, the existing runoff rate at the project site is approximately 8.0 cubic feet per second (cfs). Stormwater generally flows via sheet flow to the southeast corner of the project site where it enters an existing 20 by 14 foot reinforced concrete box storm drain located along Moreno Drive. However, a small portion of the stormwater from the project site also enters an

6 *Los Angeles County Department of Public Works Hydrology Manual, January 2006.*

7 *Hydrology/Water Quality Study, SEC Civil Engineers, Inc., April 2011.*

84-inch storm drain located along Santa Monica Boulevard. Stormwater within the 84-inch storm drain flows in an easterly direction to Moreno Drive where it junctions with the reinforced concrete box that directs the flows south along Moreno Drive. There are no known deficiencies within the storm drain system serving the project site. [8]

As described in the Initial Study for the proposed project, Appendix A of the Draft EIR, the project area is not subject to flooding, inundation, dam failures, seiche, tsunami or mudflow.

Stormwater from the project site is currently not treated prior to entering the storm drain system. Groundwater depths below the project site are located 37 feet to 42 feet below ground level.[9]

3. PROJECT IMPACTS

a. Methodology

As described in the Initial Study, Appendix A of this Draft EIR, the proposed project would not have a significant impact on groundwater levels. The project development is consistent with the urban built character of the area, and any change in the permeability of the site would be negligible with regard to the opportunity for rainwater to enter the water table below the project site. The analysis included here addresses potential impacts on hydrology/drainage and water quality. The analysis is based in part, on a Hydrology/Water Quality Study, which was prepared by SEC Civil Engineers, and included as Appendix Fof this EIR. The report is based on methodologies specified by the Los Angeles County Department of Public Works, including the Los Angeles County of Public Works 2006 Hydrology Manual and the City of Los Angeles Department of Public Works guidelines. The analysis is also based on the Geotechnical Investigation prepared for this project, Appendix D of this Draft EIR, which includes the results of site sampling to determine the depth of groundwater at the project site.

(1) Hydrology

The analysis of hydrology impacts includes a calculation of pre-project and post-project runoff rates during a 50-year storm event. Potential impacts to the storm drain system were analyzed by comparing the calculated pre-project runoff rates to the calculated post-project runoff rates, taking into consideration the capacity of the existing storm drain system serving the site.

(2) Water Quality

Water quality impacts were assessed by considering the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the project, project design features to treat contaminants, and expected contaminant flows with project implementation. Project consistency with relevant regulatory permits/requirements, including BMPs and applicable plans, is evaluated to demonstrate how compliance would ensure that the project would not significantly degrade existing water quality.

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8 *Hydrology/Water Quality Study, SEC Civil Engineers, Inc., April 2011.*

9 *Geotechnical Investigation, Josh Feffer and Jon Irvine, Feffer Geological Consulting, June 82011.*

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts with regard to hydrology and water quality. These questions are as follows:

Would the project:

- Violate any water quality standards or waste discharge requirements?
- Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?
- Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?
- Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?
- Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
- Otherwise substantially degrade water quality?
- Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Maps or other flood hazard delineation maps?
- Place within a 100-year flood plain structures which would impede or redirect flood flows?
- Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
- Inundation by seiche, tsunami, or mudflow?

In the context of these questions from Appendix G of the CEQA Guidelines, the *City of L.A. CEQA Thresholds Guide (2006)*, and the methodologies used by Los Angeles County Department of Public Works for calculating the drainage effects of a project, the project would have a significant impact on surface water flow and quality if it would:

(1) Hydrology

WQ-1 Cause flooding during the projected 50-year developed storm event which would have the potential to harm people or damage property or sensitive biological resources;

WQ-2 Substantially reduce or increase the amount of surface water in a water body; or

WQ-3 Result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

(2) Surface Water Quality

WQ-4 Result in discharges that would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

[3) Groundwater Quality

WQ-5 Affect the rate or change the direction of movement of existing contaminants;

WQ-6 Expand the area affected by contaminants;

WQ-7 Result in an increased level of groundwater contamination (including that from direct percolation, injection or salt water intrusion); or

WQ-8 Cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations (CCR), Title 22, Division 4, and Chapter 15 and in the Safe Drinking Water Act.

c. Project Design Features

(1) Hydrology and Groundwater

The proposed project has been designed to limit the building footprint and maximize the amount of open space on-site, thus maximizing pervious surfaces. The project would provide approximately 43,141 square feet of ground-level landscaping, 41 percent of the project site, mostly located in a large garden area on the south/eastern part of the site. In order to reduce stormwater runoff during a 50-year storm event, the proposed project would install biofilter planters on-site to discharge stormwater in a controlled manner to the existing storm drain on Moreno Drive, with a relatively small amount flowing to the Santa Monica Boulevard drain. A biofilter is a flow-through planter box which is designed to treat and detain runoff without allowing seepage to the underlying soil. The biofilters receive runoff from downspouts and or ground level sheet flow. Prior to entering the bio-filters, the solid particles are trapped in filter inserts and down spout filters. Potential pollutants are further removed as the runoff passes through the soil layer of the planter and is collected in an underlying layer of gravel or drain rock. A perforated pipe underdrain is then piped to a storm drain, and an overflow inlet conveys flows which exceed the capacity of the planter. The biofilter planters that are proposed for the proposed project would be designed to hold approximately 1,335 cubic feet or 9,980 gallons of discharge and maintain peak flows at 8.0 cfs.[10]

(2) Water Quality

As described below, in compliance with NPDES and City requirements, BMPs would be implemented to address water quality issues during both construction and operation of the project. Construction BMPs would include but not be limited to street sweeping and vacuuming, sand bag barriers, storm drain inlet protection, wind erosion control, and stabilized construction entrances and exits. Recommendations regarding appropriate construction BMPs for the project, pursuant to Appendix J, Attachment F of the City of Los Angeles Storm Water Program Handbook, are included in the Hydrology/Water Quality Study, Appendix

[10] *Hydrology/Water Quality Study, SEC Civil Engineers, Inc., May 2011.*

F of the Draft EIR. Operational BMPs would include the installation of biofilter planters to filter a first flush discharge of 0.75 inch of rain (0.31 cfs) from the project site, as well as standard mitigation measures from City's Development Best Management Practices Handbook.

d. Analysis of Project Impacts

(1) Construction

Construction of the proposed project would involve site preparation activities including excavation and grading. Such activities would temporarily alter the existing drainage patterns and water flows within the project site. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. However, as the construction site would be greater than one acre, the project would be required to obtain a NPDES General Construction Activity Permit. In accordance with the requirements of the permit, the project would implement a SWPPP, which would specify BMPs and erosion control measures to be used during construction to prevent pollution. BMPs would include but not be limited to street sweeping and vacuuming, sand bag barriers, storm drain inlet protection, wind erosion control, and stabilized construction entrances and exits. These and other BMPs would eliminate or reduce pollutant levels in runoff during construction, consistent with regulatory requirements. In addition, the project would be required to comply with City grading permit regulations, which require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, through compliance with NPDES requirements and City grading regulations, construction-related impacts to hydrology and water quality would be less than significant.

Construction of the project would require excavation to approximately 10 feet below the existing grade with proposed mat foundations; or with possible drilling to 50 feet if piles are used for the project foundations. Groundwater at the project site is currently 35 feet to 50 feet below the ground surface.[11] If mat foundations are used, there would be no construction impacts on groundwater, so no groundwater would need to be treated on-site, as none would be encountered at the anticipated maximum depths of excavation. If piles are used for the project foundation, groundwater may be brought to the surface. Standard construction practices would be followed for constructing the foundation such as pumping of water from foundation excavations, or placing the foundation concrete from the bottom up. Construction of the foundations would be implemented pursuant to the recommendations of the Geotechnical Investigation, as called for in Mitigation Measure D-1. Adverse impacts to groundwater quality would be avoided through implementation of BMPs recommended for such construction activity. Therefore, with implementation of the project design features, as well as compliance with the NPDES requirements inclusive of BMPs, potential impacts regarding contaminated groundwater during construction of the proposed project would be less than significant.

(2) Operation

(a) Hydrology

The proposed project would alter the current vacant, pervious conditions of the project site with the proposed residential project, increasing the amount of impervious surface area on the project site. Water flows would run off impervious surfaces seeking outlet to the local drainage system: mostly entering the 20

[11] *Geotechnical Investigation, Josh Feffer and Jon Irvine, Feffer Geological Consulting, June 8, 2011, 2011.*

by 14 foot reinforced concrete box storm drain located along Moreno Drive; and a smaller portion of the run-off flowing to the 84-inch storm drain located along Santa Monica Boulevard. As described in the Hydrology/Water Quality report for the project, there are no known deficiencies within the storm drain system serving the project site.

As described in the Project Design Features above, the project includes a system of biofilter planters that collect rainwater and treat it prior to discharge. Estimates of the existing site run-off and the projected site run-off with implementation of the project were performed using the Los Angeles County of Public Works 2006 Hydrology Manual. The estimated post-project runoff rate at the project site would be approximately 8.0 cfs during a 50-year storm event, which is the same as current existing conditions. Therefore, the project would not alter the run-off rates at the project site, and the project's drainage system has been designed to accommodate expected 50-year flow volumes. General drainage patterns in the project area would not be altered and the stormwater collected on-site would be directed to the existing drainage system. Therefore, project impacts with regard to hydrology would be less than significant.

(b) Water Quality

As discussed above, the current site is a vacant lot, and stormwater runoff primarily flows to the existing storm drain system on Moreno Drive, with a relatively small amount to the Santa Monica Boulevard drain.

Runoff from the proposed project has the potential to contain pollutants such as nutrients, pesticides, organic compounds, sediments, oil and grease, suspended solids, metals, gasoline, pathogens, and trash and debris among other pollutants. As discussed previously, the project proposes to include biofilter planters on-site to minimize the introduction of pollutants to the stormwater system. The proposed biofilter planters would be constructed pursuant to standards established by the City of Los Angeles Watershed Protection Division to assure treatment of contaminants without allowing seepage into the underlying soil. Further, the site would be subject to the City's standard BMPs for project operations.

Proper functioning of the biofilter system requires regular inspection to assure that it is not clogged, or otherwise defective and is performing as expected. Maintenance may require such actions as removal and changing of mulch, changing of screen filters if used, etc. The City's Storm Water Maintenance Division has established recommended procedures for maintenance. For further discussion, refer to the Hydrology/Water Quality Report, Appendix F of the Draft EIR. Mitigation Measure G-3 is included below to assure proper maintenance and function of the biofilter system.

With introduction of the proposed treatment system, water quality pollutants would be reduced or eliminated, and the project would comply with all applicable regulatory requirements. Therefore, impacts associated with surface water quality would be less than significant.

4. CUMULATIVE IMPACTS

As identified in Section III, General Description of Environmental Setting, of this Draft EIR, there are 40 related projects within the vicinity of the proposed project. These projects could potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff, resulting in cumulative impacts to hydrology and water quality. However, as with the proposed project, the related

projects would be subject to State NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop SWPPPs and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available. Thus, cumulative impacts to hydrology and water quality would be less than significant.

5. MITIGATION MEASURES

The proposed project would be subject to the NPDES requirements described above, including preparation of and compliance with a SWPPP and compliance with SUSMP requirements. Compliance with these requirements, in addition to the project design features outlined above, would ensure that impacts to hydrology and water quality are reduced to a less than significant level. While the proposed project is not anticipated to result in any significant impacts to hydrology and water quality, the following mitigation measures are proposed to further ensure that such impacts would be less than significant.

Mitigation Measure G-1: Prior to the start of construction, a Notice of Intent (NOI) and Stormwater Pollution Prevention Plan (SWPPP) shall be prepared in order to fulfill the California SWRCB Order No. 99-08-DWQ, NPDES General Permit No. CA000002 (General Construction Permit) and the City of Los Angeles SUSMP requirements as well as comply with the Los Angeles County Department of Public Works 2006 Hydrology Manual.

Mitigation Measure G-2: The project shall comply with the requirements of the applicable National Pollutant Discharge Elimination System (NPDES) permit for stormwater discharge and with all applicable requirements of the Regional Water Quality Control Board (RWQCB), Environmental Protection Agency (EPA), and local agencies including the City of Los Angeles regarding water quality. As part of these requirements, the Applicant shall implement Standard Urban Stormwater Mitigation Plan (SUSMP) requirements during construction of the project and shall prepare a Stormwater Prevention Pollution Plan (SWPPP) prior to construction of the project.

Mitigation Measure G-3: The project shall implement biofiltration planters to provide treatment with a first flush discharge of 0.75 inches, pursuant to review and approval by the Department of Public Works. The biofilter planters shall be inspected regularly and maintained to provide proper functioning. On-going maintenance and replacement of filters shall be provided by the property's management according to Operations and Maintenance plans consistent with City of Los Angeles Storm Water Maintenance Requirements.

Mitigation Measure G-4: All storm drain inlets and catch basins within the project area shall be stenciled with prohibitive language (such as "NO DUMPING—DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.

Mitigation Measure G-5: The legibility of signs and stencils discouraging illegal dumping shall be maintained.

Mitigation Measure G-6: During operation of the project, materials used on-site with the potential to contaminate stormwater shall be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts to hydrology and water quality would be less than significant. Furthermore, mitigation measures are proposed to ensure that such impacts would be less than significant.

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."*

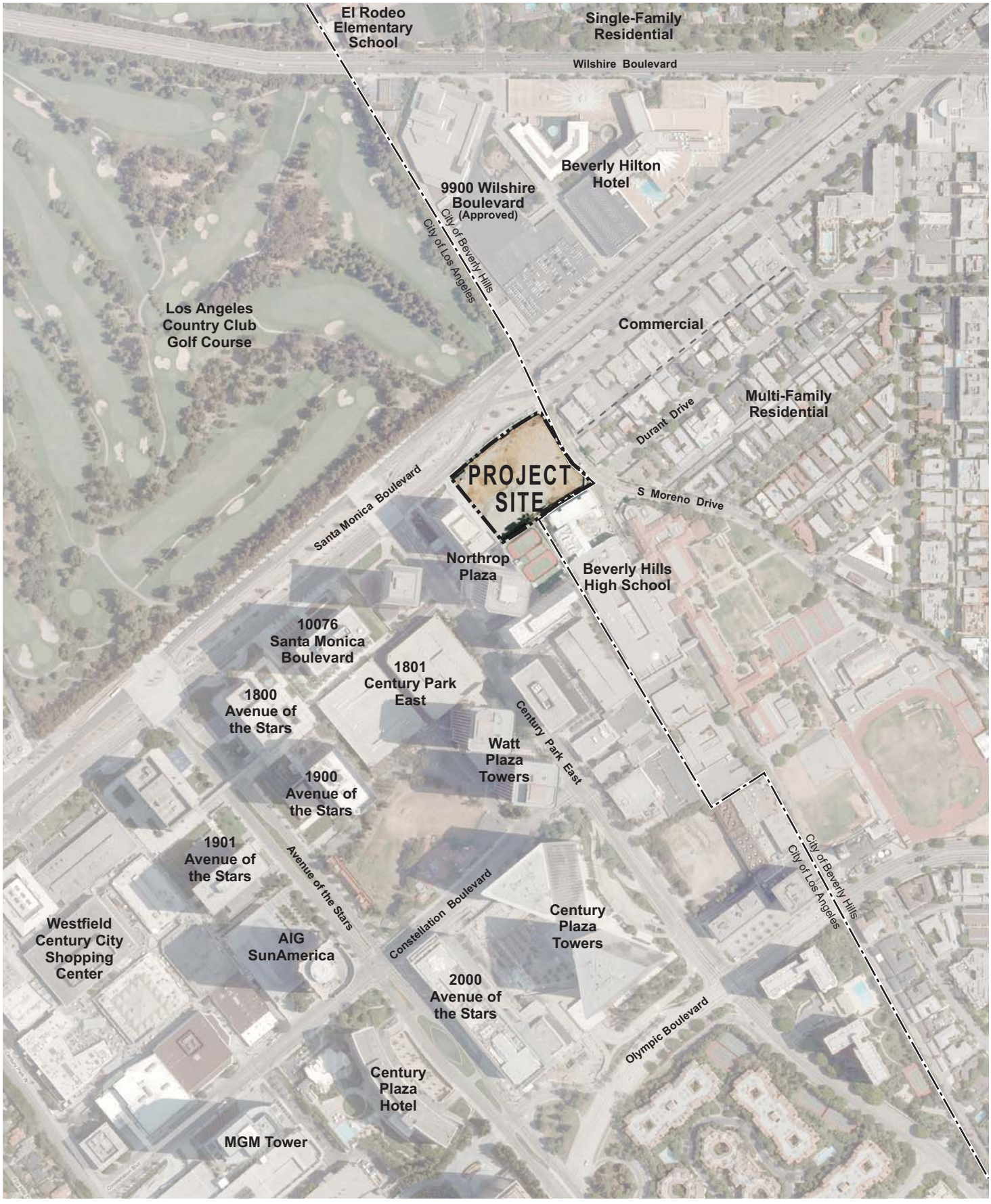
The existing zoning of the project site is C2-2-0, consistent with the designations of the applicable land use plans. The C2 portion of this designation indicates that the site is zoned for commercial uses. As the C2 zoning is cumulative, it also permits multi-family residential uses consistent with 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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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.

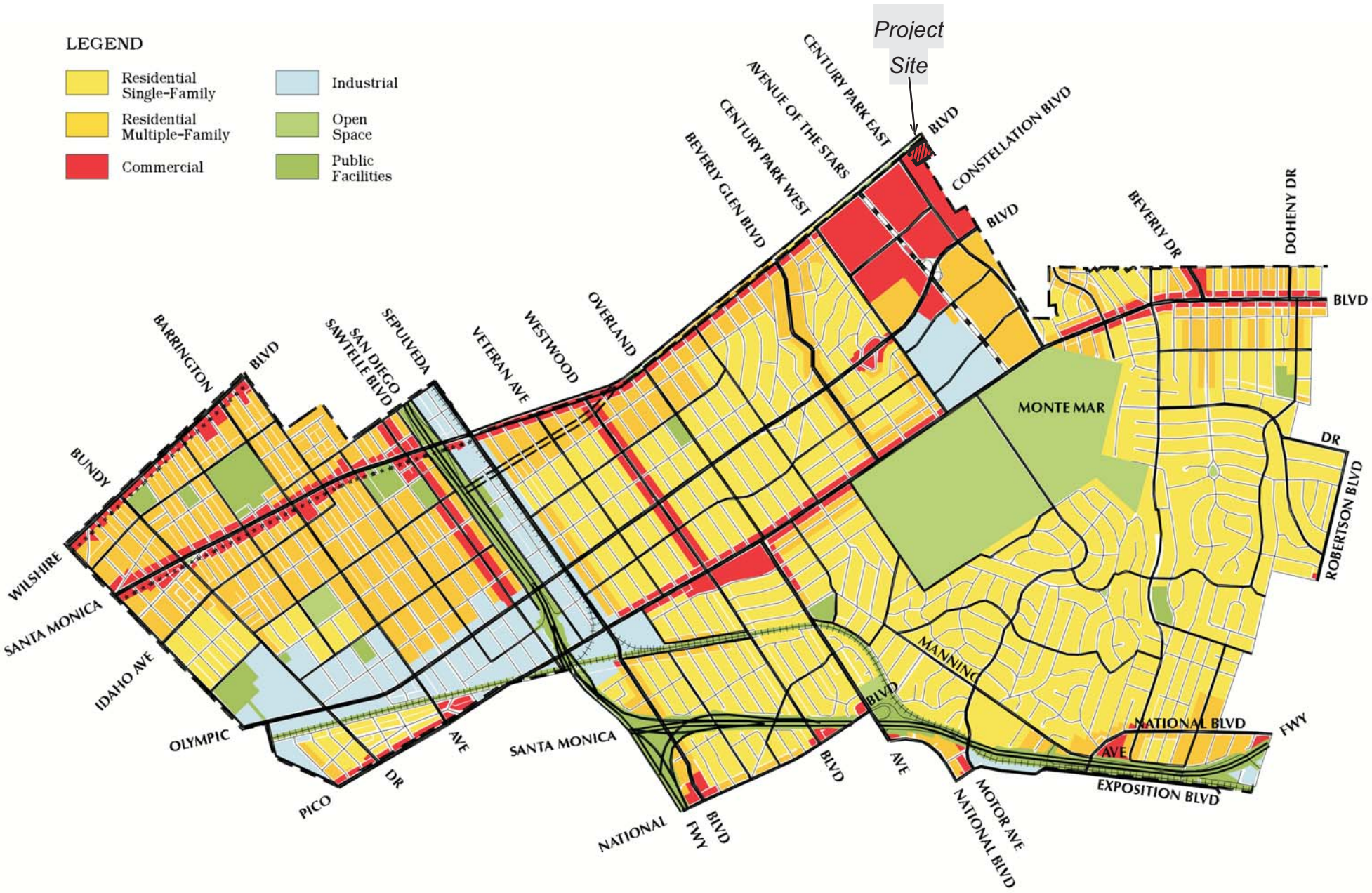
(d) Walkability Checklist

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



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.*

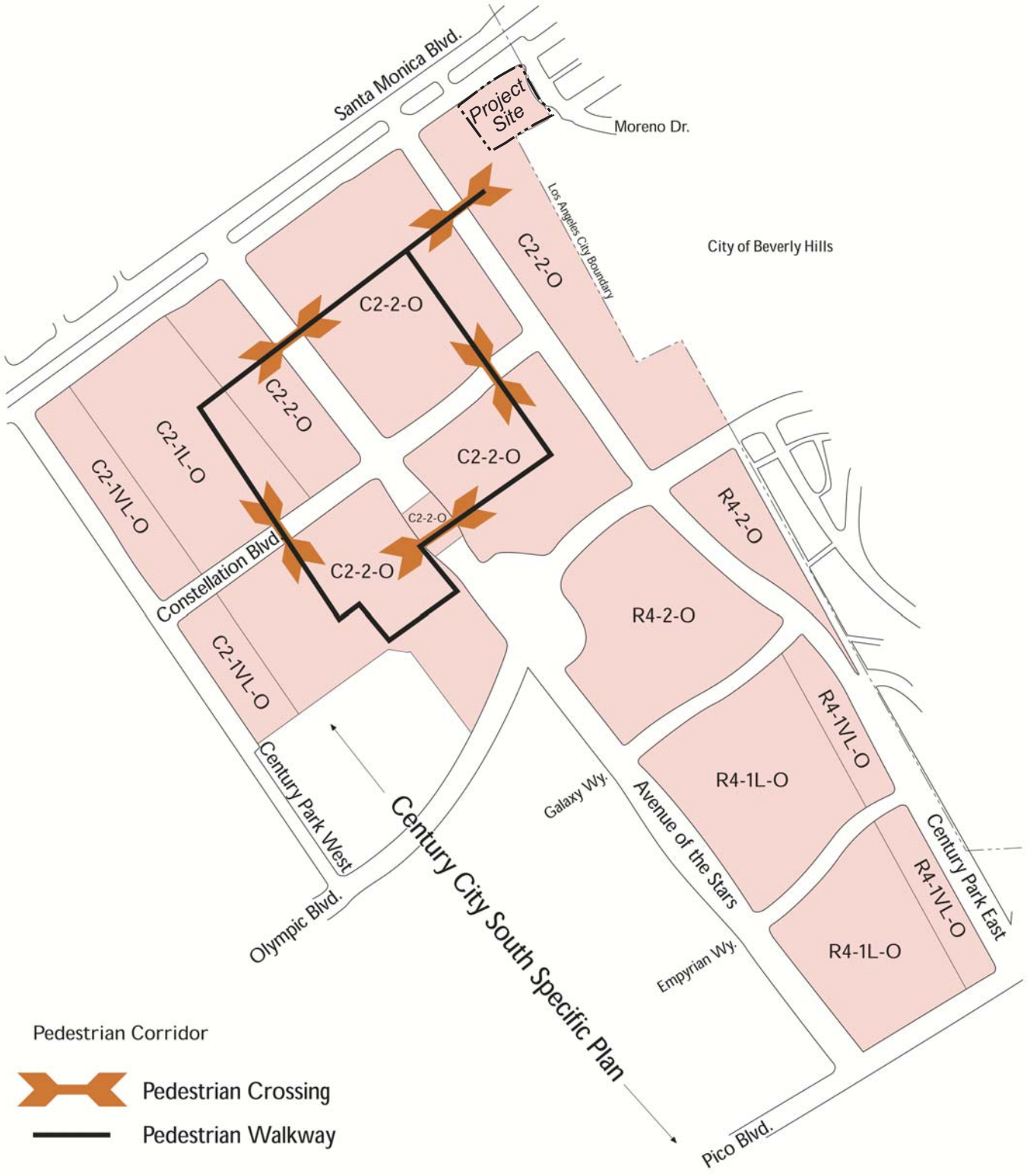
[16] *West Los Angeles Community Plan, page III-6.*

[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.

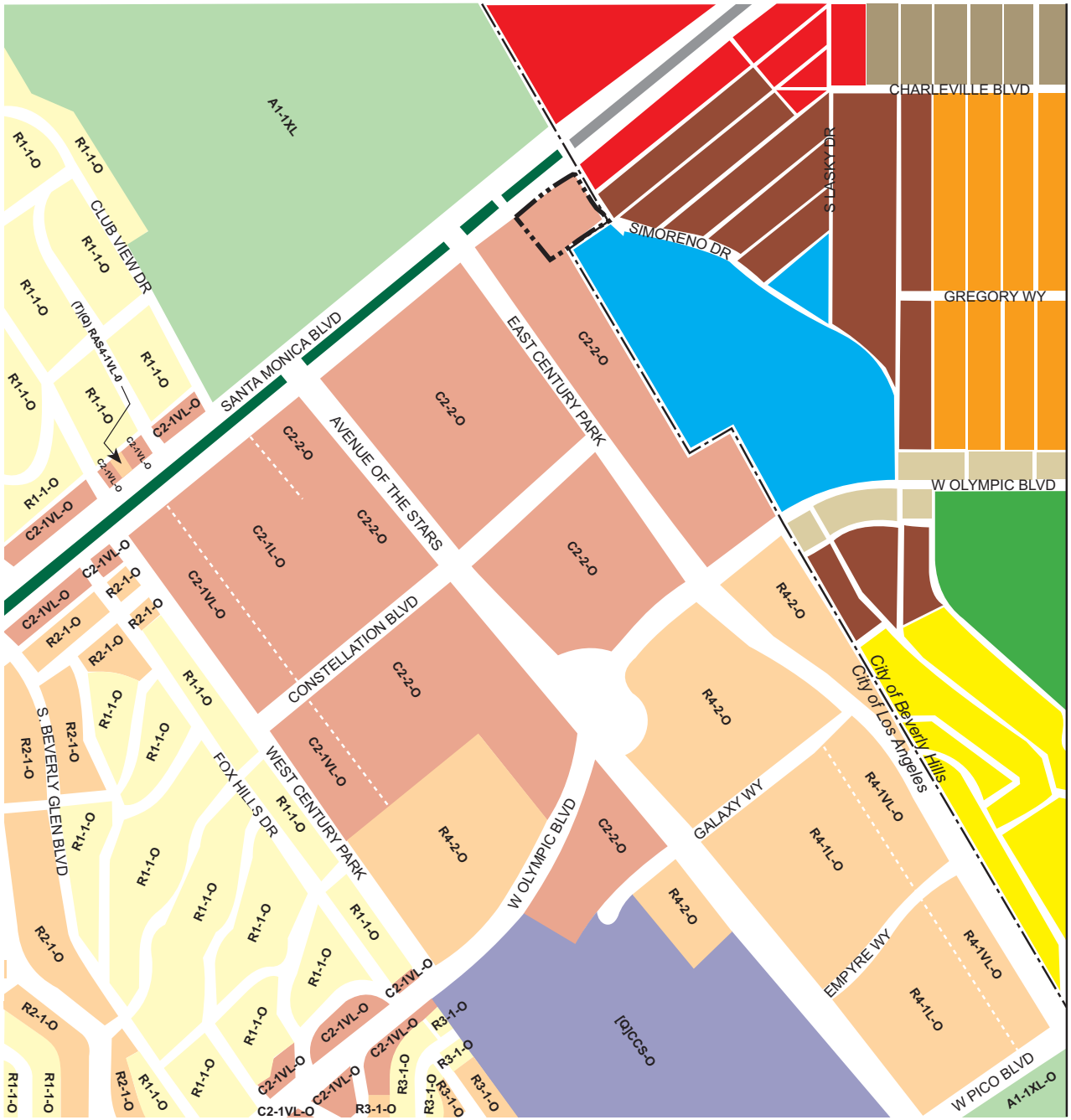
The site is also designated as being in an "O" Oil Drilling District, which is defined in the Planning and Zoning Code as districts where the drilling of oil wells or the production from the wells of oil, gas, or other hydrocarbon substances is permitted. No petroleum storage or extraction activities 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

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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.

IV. ENVIRONMENTAL IMPACT ANALYSIS
I. NOISE

1. INTRODUCTION

This section analyzes potential noise and vibration impacts associated with construction and operation of the proposed project. The analysis describes the existing noise environment within the vicinity of the project site, estimates future noise levels at surrounding land uses resulting from construction and operation of the proposed project, identifies the potential for significant impacts, and provides mitigation measures to address significant impacts. In addition, an evaluation of the potential cumulative noise impacts from the proposed project and known related projects is also provided. Noise calculation worksheets are included in Appendix G of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Noise and Vibration Basics

(1) Noise

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perceptibility of sound is subjective and the physical response to sound complicates the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as "noisiness" or "loudness." Sound pressure magnitude is measured and quantified using a logarithmic ratio of pressures, the scale of which gives the level of sound in decibels (dB). The human hearing system is not equally sensitive to sound at all frequencies. Therefore, to approximate this human, frequency-dependent response, the A-weighted filter system is used to adjust measured sound levels. The A-weighted sound level is expressed in "dBA." This scale de-emphasizes low frequencies to which human hearing is less sensitive and focuses on mid- to high-range frequencies.

Although the A-weighted scale accounts for the range of people's response, and therefore, is commonly used to quantify individual event or general community sound levels, the degree of annoyance or other response effects also depends on several other perceptibility factors. These factors include:

- Ambient (background) sound level;
- Magnitude of sound event with respect to the background noise level;
- Duration of the sound event;
- Number of event occurrences and their repetitiveness; and
- Time of day that the event occurs.

People judge the relative magnitude of sound sensation by subjective terms such as "loudness" or "noisiness." That is, a change in sound level of 3 dB is considered "just perceptible," a change in sound level of 5 dB is considered "clearly noticeable, and a change in 10 dB is recognized as "twice as loud".[1]

In an outdoor environment, sound levels attenuate through the air as a function of distance. Such attenuation is called "distance loss" or "geometric spreading" and is based on the source configuration, point source, or line source. For a point source, the rate of sound attenuation is 6 dB per doubling of distance from the noise source. For example, a sound level of 50 dBA at a distance of 25 feet from the noise source would attenuate to 44 dBA at a distance of 50 feet. For a line source, such as a constant flow of traffic on a roadway, the rate of sound attenuation is 3 dB per doubling of distance.[2] In addition, structures (e.g., buildings and solid walls) and natural topography (e.g., hills) that obstruct the line-of-sight between a noise source and a receptor further reduce the noise level if the receptor is located within the "shadow" of the obstruction, such as behind a sound wall. This type of sound attenuation is known as "barrier insertion loss." If a receptor is located behind the wall but still has a view of the source (i.e., line-of-sight not fully blocked), some barrier insertion loss would still occur, however to a lesser extent. Additionally, a receptor located on the same side of the wall as a noise source may actually experience an increase in the perceived noise level as the wall reflects noise back to the receptor, thereby compounding the noise. Noise barriers can provide noise level reductions ranging from approximately 5 dBA (where the barrier just breaks the line-of-sight between the source and receiver) to an upper range of 20 dBA with a more substantial barrier.[3]

Community noise levels usually change continuously during the day. The equivalent sound level (L_{eq}) is normally used to describe community noise. The L_{eq} is the equivalent steady-state A-weighted sound level that would contain the same acoustical energy as the time-varying A-weighted sound level during the same time interval. For intermittent noise sources, the maximum noise level (L_{max}) is normally used to represent the maximum noise level measured during the measurement. Maximum and minimum noise levels, as compared to the L_{eq}, are a function of the characteristics of the noise source. As an example, sources such as generators have maximum and minimum noise levels that are similar to L_{eq} since noise levels for steady-state noise sources do not substantially fluctuate. However, as another example, vehicular noise levels along local roadways result in substantially different minimum and maximum noise levels when compared to the L_{eq} since noise levels fluctuate during pass-by events. The City of Los Angeles Noise Ordinance uses the L_{eq} to evaluate noise violations.

To assess noise levels over a given 24-hour time period, the community noise equivalent level (CNEL) descriptor is used in land use planning. CNEL is the time average of all A-weighted sound levels for a 24-hour period with a 5 dBA adjustment (upward) added to the sound levels which occur in the evening (7:00 P.M. to 10:00 P.M.) and a 10 dBA adjustment (upward) added to the sound levels which occur in the night (10:00 P.M. to 7:00 A.M.). These penalties attempt to account for increased human sensitivity to noise during the quieter nighttime periods, particularly where sleep is the most probable activity. CNEL has been adopted by the State of California to define the community noise environment for development of a community noise

1 *Engineering Noise Control, Bies & Hansen, 1988.*
2 *Caltrans, Technical Noise Supplement (TeNS), 1998.*
3 *Ibid.*

element of a General Plan and is also used by City of Los Angeles for land use planning in the City's Noise Element of the General Plan.[4]

(2) Ground-Borne Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. With respect to ground-borne vibration, velocity and acceleration descriptors are typically used, as most vibration sensors are velocity or acceleration sensor. In addition, the response of humans, buildings, and equipment to vibration is more accurately described using velocity or acceleration.[5] Vibration amplitudes are usually described as either peak, as in peak particle velocity (PPV) or root-mean-square (RMS). The RMS vibration velocity level can be presented in inches/second or in VdB (referenced to 1 micro-inches per second). The peak level represents the maximum instantaneous peak of the vibration signal and the RMS represents the average of the squared amplitude of the vibration signal. In addition, vibrations can be measured in the vertical, horizontal longitudinal, or horizontal transverse directions. Ground vibrations are most often greatest in the vertical direction.[6] Therefore, the analysis of ground-borne vibration is addressed in the vertical direction.

b. Existing Conditions

(1) Noise-Sensitive Receptor Locations

Some land uses are considered more sensitive to intrusive noise than others due to the amount of noise exposure and the types of activities typically involved at the receptor location. The *City of L.A. CEQA Thresholds Guide (2006)* states that residences, schools, motels and hotels, libraries, religious institutions, hospitals, nursing homes, and parks are generally more sensitive to noise than commercial and industrial land uses. Noise sensitive receptors were selected based on the relative distance from the receptors to the project site, in accordance with the *City of L.A. CEQA Thresholds Guide* screening criteria. Existing noise sensitive uses in the project vicinity are shown in **Figure IV.I-1**, *Noise Sensitive Uses and Noise and Vibration Measurement Locations*, and include the following:

- Multi- Family Residential Areas: Located to the east side of the project site along Moreno Drive and Durant Drive. The nearest multi-family residential properties are located approximately 60 feet from the project site. These residential uses are located within the City of Beverly Hills.
- School Uses: Beverly Hills High School (BHHS) and in particular the Science and Technology Center building is located south of the project site on Moreno Drive approximately 25 feet from the nearest property line of the project site, but approximately 170 feet from the project's residential building and approximately 60 feet from the ancillary building.

(2) Ambient Noise Levels

The predominant noise source surrounding the project site is roadway noise from the Santa Monica Boulevard to the north and Moreno Drive to the east. Secondary noise sources including commercial/retail-

[4] *State of California, General Plan Guidelines, 2002.*
[5] *Federal Transit Authority, Transit Noise and Vibration Impact Assessment, Final Report, page 7-3, April 1995.*
[6] *California Department of Transportation (Caltrans), Transportation Related Earthborne Vibrations, page 4, February 2002.*

related activities along Santa Monica Boulevard, such as loading dock/delivery truck activities, trash compaction, parking garage, and refuse services activities.

Measured Noise Levels – Existing Conditions

Ambient noise measurements were taken at four locations to asses existing noise levels at the project site and nearby land uses in the vicinity of the project site.[7] The four noise measurement locations are identified as R1, R2, R3, and R4 as shown in Figure IV.I-1. As shown in **Table IV.I-1**, *Summary of Ambient Noise Measurements*, short-term (15-minute) measurements were conducted at locations R1 and R4 on Thursday, May 12, 2011 between the hours of 11:00 A.M. and 1:00 P.M. Long-term (24-hour) measurements were conducted at locations R2 and R3 from Friday, May 13, 2011 through Sunday, May 15, 2011. The four noise measurement locations are further described below:

Table IV.I-1

Summary of Ambient Noise Measurements

Measurement Location, Day, and Time	Distance to Nearest Proposed Building	Measured Ambient Noise Levels[a] (dBA) Daytime (7 A.M. to 10 P.M.) Hourly L_{eq}	Nighttime (10 P.M. to 7 A.M.) Hourly L_{eq}	24-Hour Average CNEL
R1 – North project boundary				
Thursday, 5/12/11(11 A.M. to 1 P.M.)	Project Site	66.8	-	N/A[b]
R2 – East project boundary/Multi-family residential uses				
Friday, 5/13/11 (full 24 hours)	60 feet	56.2 – 76.8	50.7 – 59.4	69.2
Saturday, 5/14/11 (full 24 hours)		52.7 – 74.8	47.7 – 55.4	67.0
Sunday, 5/15/11 (full 24 hours)		52.6 – 61.7	47.7 – 54.4	60.7
R3 – South project boundary/School uses				
Friday, 5/13/11 (full 24 hours)	25 feet	52.3 – 67.3	47.9 – 53.8	61.8
Saturday, 5/14/11 (full 24 hours)		50.2 – 64.9	45.3 – 51.5	60.2
Sunday, 5/15/11 (full 24 hours)		48.1 – 54.4	45.2 – 51.0	56.5
R4 – Multi-family residential uses along Durant Drive				
Thursday, 5/12/11 (11 A.M. to 1 P.M.)	300 feet	55.4	-	N/A[b]

[a] *Detailed measured noise data, including hourly L_{eq} levels, are included in Appendix G.*

[b] *The CNEL measurements are based on 24-hour measurements. Therefore, CNEL values are not estimated for locations R1 and R4, which were measured from 11:00 A.M. to 1:00 P.M.*

Source: PCR Services Corporation, 2011.

[7] *The ambient noise measurements were conducted using the Larson-Davis 820 Precision Integrated Sound Level Meter (SLM). The Larson-Davis 820 SLM is a Type 1 standard instrument as defined in the American National Standard Institute (ANSI) S1.4. All instruments were calibrated and operated according to the applicable manufacturer specification.*

PCR

N

0 400 Feet

Noise Sensitive Uses and Noise and Vibration Measurement Locations

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2008; Google Earth, 2008.

FIGURE

IV.I-1

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- Noise Measurement Location R1: This measurement location represents the project site. The sound measuring device (sound level meter) was placed within the project boundaries near Santa Monica Boulevard.
- Noise Measurement Location R2: This measurement location represents the existing sound environment at the project site and the nearby multi-family residential units east of the project site. The sound level meter was placed on the east boundary of the project site near Moreno Drive.
- Noise Measurement Location R3: This measurement location represents the project site and BHHS located immediately south of the project site. The sound level meter was placed on the south boundary of the project site.
- Noise Measurement Location R4: This measurement location represents the multi-family residential uses along Durant Drive. The sound level meter was placed on Durant Drive approximately 200 feet from the northeast corner of Durant Drive and Moreno Drive.

As also shown in Table IV.I-1, the measured CNEL at the project site ranged from 56.5 CNEL at the southern project boundary to 69.2 CNEL at the eastern project boundary. The City of Los Angeles uses state land use noise compatibility guidelines for evaluating whether the CNEL level in a particular neighborhood is acceptable for a particular use.[8] The noise compatibility guidelines are shown in **Table IV.I-2**, *City of Los Angeles Land Use Compatibility for Community Noise*. CNEL guidelines for specific land uses are classified into four categories: (1) "normally acceptable," (2) "conditionally acceptable," (3) "normally unacceptable," and (4) "clearly unacceptable." As indicated, the noise environment in the project area (i.e. 56.5 CNEL to 69.2 CNEL) is considered "normally acceptable" to "conditionally acceptable" for multi-family residential uses.

Modeled Noise Conditions – Traffic Noise

To further characterize the area's noise environment, the CNEL noise levels generated by existing traffic on local roadways was calculated using a noise prediction model based on calculation methodologies provided in the California Department of Transportation (Caltrans) Technical Noise Supplement (TeNS) document and traffic data included in the Traffic Study for the proposed project.[9]

A model calibration test (i.e. actual sampled data) was performed at Santa Monica Boulevard, west of Moreno Drive (R1), for comparison to the noise level predicted by the noise prediction mode. A minimum of 15-minute noise recording was made concurrent with logging of actual traffic volumes and auto fleet mix (i.e., standard automobile, medium duty truck, or heavy duty truck). The traffic counts were entered into the noise model along with the observed speed, lane configuration, and distance to the roadway to calculate the traffic noise levels. The results of the traffic noise model calibration are provided in **Table IV.I-3**, *Traffic Noise Model Calibration Results*. As indicated, the noise model results are within less than 1 dBA of the measured noise levels, which is within the industry standard tolerance of the noise prediction model. Therefore, the project specific traffic noise prediction model is considered accurate and specific to project conditions.

[8] *City of Los Angeles CEQA Thresholds Guide, 2006, page I.2-4.*

[9] *The roadway noise calculation procedures provided in the Caltrans TeNS are consistent with Federal Highway Administration RD-77-108 roadway noise prediction methodologies. This methodology allows for the definition of roadway configurations, barrier information (if any), and receiver locations.*

Table IV.I-2

City of Los Angeles Land Use Compatibility for Community Noise

Land Use	Community Noise Exposure CNEL, dBA			
	Normally Acceptable [a]	Conditionally Acceptable [b]	Normally Unacceptable [c]	Clearly Unacceptable [d]
Single-Family, Duplex, Mobile Homes	50 to 60	55 to 70	70 to 75	Above 70[e]
Multi-Family Homes	50 to 65	60 to 70	70 to 75	Above 70[e]
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 to 70	60 to 70	70 to 80	Above 80
Transient Lodging—Motels, Hotels	50 to 65	60 to 70	70 to 80	Above 80
Auditoriums, Concert Halls, Amphitheaters	—	50 to 70	—	Above 65
Sports Arena, Outdoor Spectator Sports	—	50 to 75	—	Above 70
Playgrounds, Neighborhood Parks	50 to 70	—	67 to 75	Above 72
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 to 75	—	70 to 80	Above 80
Office Buildings, Business and Professional Commercial	50 to 70	67 to 77	Above 75	—
Industrial, Manufacturing, Utilities, Agriculture	50 to 75	70 to 80	Above 75	—

[a] *Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.*

[b] *Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.*

[c] *Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.*

[d] *Clearly Unacceptable: New construction or development should generally not be undertaken.*

[e] *This 70 dB figure is quoted directly from the City of L.A. CEQA Thresholds Guide. However, other sources quote this number as 75 dB (i.e., State of California General Plan Guidelines, Preliminary Draft, Governor's Office of Planning and Research, October 2002, p. 258, and Noise Element of the City of Los Angeles General Plan, Department of City Planning Los Angeles, California, February 1999, p. I-1). This may be a typographical error in the City of L.A. CEQA Thresholds Guide (2006). Note that this potential error does not affect the determination of significant impacts for this report.*

Source: City of L.A. CEQA Thresholds Guide, 2006.

The traffic noise prediction model calculates the 24-hour CNEL noise levels based on specific information including, average daily traffic volume (ADT), percentages of day, evening and nighttime traffic volumes relative to ADT, vehicle speed, and distance between the noise receptor and the roadway. Vehicle mix/distribution information used in the noise calculation is shown in **Table IV.I-4**, *Vehicle Mix for Traffic Noise Model*. As indicated in **Table IV.I-5**, *Predicted Existing Vehicular Traffic Noise Levels*, the calculated CNEL for the analyzed roadway segments as a result of existing traffic volumes ranged from 58.1 dBA CNEL to 72.7 dBA CNEL at a distance of 25 feet based on surface-street traffic volumes only. As shown therein,

Table IV.I-3

Traffic Noise Model Calibration Results

Road Segment/Noise Measurement Location	Traffic Counts During Noise Readings 15-minutes (A.M./P.M.) Autos	Medium Trucks [a]	Heavy Trucks [b]	Measured Traffic Noise Levels L_{eq} (dBA)	Project Traffic Noise Model Predicted Noise Levels L_{eq} (dBA)	Difference between Predicted and Measured Levels dBA
Santa Monica Blvd./ R1 (P.M.)	564	16	5	66.9	67.5	0.6

[a] *Medium Truck – 2 axle trucks based on field observations.*
[b] *Heavy Truck – 3 or more axles trucks and buses based on field observations.*

Source: PCR Services Corporation, 2011.

Table IV.I-4

Vehicle Mix for Traffic Noise Model

Vehicle Type	Percent of ADT Daytime hours (7 A.M. to 7 P.M.)	Evening Hours (7 P.M. to 10 P.M.)	Nighttime Hours (10 P.M. to 7 A.M.)	Total
Automobile	78.4	9.8	9.8	98.0
Medium Truck[a]	0.8	0.1	0.1	1.0
Heavy Truck[b]	0.8	0.1	0.1	1.0

[a] *Medium Truck – 2 axle trucks based on field observations.*
[b] *Heavy Truck – 3 or more axles trucks and buses based on field observations.*

Source: PCR Services Corporation, 2008.

traffic related noise levels at the nearest sensitive receptors to each analyzed roadway segment exceed normally acceptable noise levels at the majority of the studied residential areas (i.e., 65 dBA CNEL or lower), except at residential uses along Roxbury Drive, Bedford Drive, Prosser Avenue, Spalding Drive, Moreno Drive, Durant Drive, Veteran Drive, Olympic Boulevard between Century East and Spalding Drive, Olympic Boulevard east of Spalding Drive, and Century Park West between Santa Monica Boulevard and Constellation Avenue.

(3) Vibration-Sensitive Receptor Locations

The analysis of vibration below is based on the vibration effects that could occur at the nearest sensitive receptors to the project site. These include the nearest residential unit located across Moreno Drive from the project site, and the Beverly Hills High School Science and Technology Center (Science and Technology Center) located across a driveway abutting the southern edge of the project site. The analysis also addresses

Table IV.I-5

Predicted Existing Vehicular Traffic Noise Levels

Roadway Segment	Adjacent Land Use	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way		
		Adjacent	25 Feet	50 Feet
Santa Monica Boulevard				
West of Century Park West	Residential	72.4	70.4	69.0
Between Century Park West & Century Park East	Residential	71.8	70.0	68.7
Between Century Park East & Moreno Dr.	Residential	72.2	70.2	68.8
Between Moreno Dr. & Wilshire Blvd.	Residential	71.2	69.2	67.8
Between Wilshire Blvd. & Beverly Dr.	Residential	73.4	70.1	68.3
East of Beverly Dr.	Residential	72.8	69.9	68.1
South Santa Monica Boulevard				
Between Century Park East & Moreno Dr.	Residential	76.4	72.3	70.3
Wilshire Boulevard				
Northwest of Santa Monica Blvd.	Residential	73.8	71.0	69.3
Olympic Boulevard				
Between Overland Ave. & Prosser Ave.	Residential	67.1	65.0	63.5
Between Prosser Ave. & Beverly Glen Blvd.	Residential	70.2	68.1	66.6
Between Beverly Glen Blvd. & Century Park West	Residential	73.3	71.2	69.7
Between Century Park West and Century Park East	Residential	68.8	66.7	65.3
Between Century Park East & Spalding Dr.	Residential	62.2	60.1	58.6
East of Spalding Dr.	Residential	64.0	61.8	60.4
Roxbury Drive				
North of Santa Monica Blvd.	Residential	63.4	60.4	58.7
North of Olympic Blvd.	Residential	62.4	59.4	57.7
South of Olympic Blvd.	Residential	62.7	59.8	58.0
Roxbury Drive/Brighton Way				
South of Wilshire Blvd.	Residential	62.8	59.8	58.0
Bedford Drive				
North of Santa Monica Blvd.	Residential	63.3	60.3	58.6
Prosser Avenue				
North of Olympic Blvd.	Residential	61.4	58.4	56.7
South of Olympic Blvd.	Residential	61.3	58.3	56.6
Beverly Glen Boulevard				
North of Santa Monica Blvd.	Residential	71.6	69.2	67.6
Between Santa Monica Blvd. & Olympic Blvd.	Residential	69.6	67.2	65.6
South of Olympic Blvd.	Residential	68.0	65.6	64.0
Veteran Drive				
North of Santa Monica Blvd.	Residential	67.4	64.4	62.7
South of Santa Monica Blvd.	Residential	66.4	63.4	61.6
Overland Avenue				
Between Santa Monica Blvd. & Olympic Blvd.	Residential	68.7	66.3	64.7
South of Olympic Blvd.	Residential	70.6	68.2	66.6

Roadway Segment	Adjacent Land Use	Existing CNEL (dBA) at Referenced Distances from Roadway Right-of-Way		
		Adjacent	25 Feet	50 Feet
Century Park West				
Between Santa Monica Blvd. & Constellation Ave.	Residential	67.9	64.7	62.8
Between Constellation Ave. & Olympic Blvd.	Residential	69.0	65.7	63.9
Century Park East				
Between Olympic Blvd. & Pico Blvd.	Residential	69.3	66.5	64.8
Spalding Drive				
North of Olympic Blvd.	Residential	66.2	63.2	61.5
South of Olympic Blvd.	Residential	61.0	58.1	56.3
North of Moreno Dr.	Residential	65.6	62.7	60.9
Avenue of the Stars				
Between Santa Monica Blvd. & Constellation Ave.	Residential	72.1	69.3	67.6
Between Constellation Ave. & Olympic Blvd.	Residential	72.7	69.9	68.2
Moreno Drive				
Between Santa Monica Blvd. & Durant Dr.	Residential	66.0	61.9	59.9
South of Durant Dr.	Residential	67.2	63.1	61.0
Durant Drive				
East of Moreno Dr.	Residential	64.2	61.2	59.5
Pico Boulevard				
West of Beverly Glen Blvd.	Residential	74.9	72.7	71.3
Between Beverly Glen Blvd. and Motor Ave.	Residential	74.8	72.7	71.2

Source: PCR Services Corporation, 2011.

potential vibration impacts at a residential location on Durant Drive, within the residential neighborhood further east to indicate the extent of more distant vibration effects.

(4) Ground-Borne Vibration Environment

The existing ground vibration environment surrounding the project site is comprised primarily of auto traffic on nearby streets. A vibration survey was conducted at the project's southern boundary near the Science and Technology Center (Vibration Measurement Location V1) and at two residential receptors including multi-family residential uses across Moreno Drive (Vibration Measurement Location V2) and multi-family residential uses along Durant Drive (Vibration Measurement Location V3) as shown in Figure IV.I-1, above. In general, the current ground vibration environment in the vicinity of the project site is below the "barely perceptible" level of 0.01 inch per second PPV. However, vibration sampling at the project site identified a couple of short events (less than a few seconds) in which the measured ground vibration reached a peak level of 0.0135 inch per second PPV at location V2 and 0.0365 inch per second PPV at location V1

which is within the "distinctly perceptible" level. Measured ground vibration levels of 0.0365 inch per second PPV were also identified at location V1.[10]

c. Regulatory Framework

Many government agencies have established noise standards and guidelines to protect citizens from potential hearing damage and various other adverse physiological and social effects associated with noise. The project site is located within the Century City Community of the City of Los Angeles. Therefore, applicable policies and regulations from the City of Los Angeles are used to assess potential noise impacts from the proposed project.

(1) City of Los Angeles General Plan Noise Element

The overall purpose of the Noise Element of a General Plan is to protect citizens from the harmful and annoying effects of exposure to excessive noise. City of Los Angeles Noise Element policies that relate to the proposed project include the following:[11]

- Policy 2.2—Enforce and/or implement applicable city, state, and federal regulations intended to mitigate proposed noise producing activities, reduce intrusive noise, and alleviate noise that is deemed a public nuisance.
- Policy 3.1—Develop land use policies and programs that would reduce or eliminate potential and existing noise impacts.

(2) Los Angeles Municipal Code

The City of Los Angeles Noise Regulation is provided in Chapter XI of the LAMC. Section 111.02 of the LAMC provides procedures and criteria for the measurement of the sound level of "offending" noise sources. In accordance with the LAMC, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. To account for people's increased tolerance for short-duration noise events, the Noise Regulation provides a 5 dBA allowance for noise source occurring more than five but less than fifteen minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for noise source occurring five minute or less in any one-hour period.[12]

The LAMC indicates that in cases where the actual measured ambient conditions are not known or are less than 50 dBA, the presumed daytime (7:00 A.M. to 10:00 P.M.) and nighttime (10:00 P.M. to 7:00 A.M.) minimum ambient noise levels defined in Section 111.02 of the LAMC should be used. The presumed ambient noise

[10] *Detailed information regarding the vibration testing is included in Appendix G of this Draft EIR. Ground vibration recordings were performed in 2008 and are considered representative of the current site conditions; as ground conditions have not changed since 2008, and comparisons of noise sampling between 2008 and 2011 indicated that changes in traffic generated noise (and co-occurring vibration) are negligible. Any slight increase in traffic would render the use of the 2008 data a more conservative estimate as project additions to the vibration setting would represent a greater percentage increase. The monitoring included Long-term (24-hour) vibration measurements at the project's southern boundary (V1) and short-term (15-minute) vibration measurements at the two off-site locations (V2 and V3). The portable seismic monitoring system Model SSU 3000LC manufactured by Geo Sonics was programmed to record ground movement in one minute intervals in the form of PPV, in units of inch per second.*

[11] *Noise Element of the Los Angeles City General Plan, adopted February 3, 1999.*

[12] *Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).*

levels for these areas as set forth in the LAMC Sections 111.02 and 112.05 are provided in **Table IV.I-6**, *City of Los Angeles Presumed Ambient Noise Levels*. For residential-zoned areas, the presumed ambient noise level is 50 dBA during the daytime and 40 dBA during the nighttime.

Table IV.I-6

City of Los Angeles Presumed Ambient Noise Levels

Zone	Daytime Hours (7 A.M. to 10 P.M.) dBA (L_{eq})	Nighttime Hours (10 P.M. to 7 A.M.) dBA (Leq)
Residential	50	40
Commercial	60	55
Manufacturing	65	65
Heavy Manufacturing	70	70

Source: Los Angeles Municipal Code, Section 111.03.

Section 112.05 of the LAMC sets a maximum noise level for construction equipment of 75 dBA at a distance of 50 feet when operated within 500 feet of a residential zone. Compliance with this standard is only required where "technically feasible."[13] Section 41.40 of the LAMC prohibits construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. In general, the City of Los Angeles Department of Building and Safety enforces noise ordinance provisions relative to equipment and the Los Angeles Police Department enforces provisions relative to noise generated by people.

(3) Guidelines for Noise Compatible Land Use

The City of Los Angeles has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the State Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the *City of L.A. CEQA Thresholds Guide (2006)* in terms of CNEL. CNEL guidelines for specific land uses are classified into four categories: (1) "normally acceptable," (2) "conditionally acceptable," (3) "normally unacceptable," and (4) "clearly unacceptable." As shown in Table IV.I-2, on page 7 a CNEL value of 65 dBA is the upper limit of what is considered a "normally acceptable" noise environment for multi-family residential uses, although a CNEL as high as 70 dBA is considered "conditionally acceptable." The upper limit of what is considered "normally unacceptable" for residential uses is set at 75 dBA CNEL.[14] New development should generally be discouraged within the "unacceptable" category. However, if new development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

[13] *In accordance with the City of Los Angeles Noise Ordinances, "technically feasible" means that the established noise limitations can be complied with at a project site, with the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques employed during the operation of equipment.*

[14] *City of L.A. CEQA Thresholds Guide, Section I.2, 2006.*

(4) Ground-Borne Vibration (State and Federal Standards)

The City of Los Angeles does not have specific policies or guidelines relative to ground-borne vibration. As such, policies and guidelines from Caltrans and Federal Transit Administration (FTA) are utilized to assess impacts due to ground-borne vibration. Ground-borne vibration impacts are evaluated based on a) potential building damage, b) potential human annoyance, and c) potential effect on vibration sensitive equipment. The FTA and Caltrans have adopted guidelines/recommendations to limit ground-borne vibration based on the age and/or condition of the structures that are located in close proximity to construction activity. Studies by the Caltrans and FTA show vibration velocity levels greater than 0.04 inch per second PPV are distinctly perceptible to human and become strongly perceptible when reaching 0.10 inch per second PPV as shown in **Table IV.I-7**, *Guideline Vibration Annoyance Potential Threshold Criteria*.

Table IV.I-7

Guideline Vibration Annoyance Potential Threshold Criteria

	Maximum PPV (inch per second)/VdB	
Human Response	**Transient Sources [a]**	**Continuous/Frequent Intermittent Sources [b]**
Barely perceptible	0.04/80	0.01/68
Distinctly perceptible	0.25/96	0.04/80
Strongly perceptible	0.90/104	0.10/88
Severe	2.00/114	0.40/100

[a] *Transient sources created a single isolated vibration event, such as blasting or drop balls.*
[b] *Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-an-seat equipment, vibratory pile drivers, and vibratory compaction equipment.*

Source: Caltrans, Transportation- and Construction-Induced Vibration Guidance Manual, Table 20, 2004.

The building damage threshold with respect to ground vibration varies depending on the age and condition of the structure in question. While modern industrial/commercial buildings can endure vibration levels up to a maximum of 0.5 inch per second PPV, older structures have a much lower vibration tolerance of 0.3 inch per second PPV. Furthermore, buildings of historical nature or extremely fragile structures have an even lower vibration damage threshold of 0.08 to 0.25 inch per second PPV as shown in **Table IV.I-8**, *Guideline Vibration Damage Potential Threshold Criteria*.

FTA recommends maximum vibration levels associated with the nature of activities affected. These guidelines recommend a maximum of 75 VdB for frequent vibration events at institutional uses such as schools (78 VdB for occasional events and 83 VdB for infrequent events); and 72 VdB for frequent events at residences and buildings where people normally sleep (75 VdB for occasional events and 80 VdB for infrequent events); and 65 VdB for buildings where vibrations would interfere with interior operations, e.g. a building that might have sensitive equipment such as an optical microscope.[15]

[15] *Federal Transit Administration, "Transit Noise and Vibration Impact Assessment", Table 8-1, May 2006.*

Table IV.I-8

Guideline Vibration Damage Potential Threshold Criteria

Structure and Condition	Maximum PPV (inch per second)	
	Transient Sources [a]	Continuous/Frequent Intermittent Sources [b]
Extremely fragile buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50

[a] *Transient sources created a single isolated vibration event, such as blasting or drop balls.*
[b] *Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-an-seat equipment, vibratory pile drivers, and vibratory compaction equipment.*

Source: Caltrans, Transportation- and Construction-Induced Vibration Guidance Manual, Table 19, 2004.

3. PROJECT IMPACTS

a. Methodology

(1) On-Site Construction Noise

Noise impacts from on-site construction, truck staging, and hauling are evaluated by determining the noise levels generated by the different types of construction activity, calculating the construction-related noise level at nearby sensitive receptor locations, and comparing these construction-related noise levels to existing ambient noise levels (i.e., noise levels without construction noise). More specifically, the following steps were undertaken to calculate construction-period noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table IV.I-1 on page 5);

2. Typical noise levels for each construction equipment were obtained from the Federal Highway Administration (FHWA) roadway construction noise model (RCNM);

3. Distances between construction site locations (noise source) and surrounding sensitive receptors were measured using project architectural drawings, Google Earth, and site plans;

4. The construction noise level was then calculated, in terms of hourly L_{eq}, for sensitive receptor locations based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance; and

5. Construction noise levels were then compared to the construction noise significance thresholds identified below.

(2) Off-Site Roadway Noise (Construction and Operation)

Roadway noise impacts have been evaluated using the Caltrans TeNS methodology based on the roadway traffic volume data provided in the Traffic Impact Study prepared for the proposed project. This methodology allows for the definition of roadway configurations, barrier information (if any), and receiver locations. Roadway noise attributable to project development was calculated and compared to baseline noise levels that would occur under the "without project" condition.

(3) Stationary Point-Source Noise (Operation)

Stationary point-source noise impacts have been evaluated by identifying the noise levels generated by outdoor stationary noise sources such as rooftop mechanical equipment and loading dock activities, calculating the hourly L_{eq} noise level from each noise source at surrounding sensitive receiver property line locations, and comparing such noise levels to existing ambient noise levels. More specifically, the following steps were undertaken to calculate outdoor stationary point-source noise impacts:

1. Ambient noise levels at surrounding sensitive receptor locations were estimated based on field measurement data (see Table IV.I-1 on page 5);

2. Distances between stationary noise sources and surrounding sensitive receptor locations were measured using project architectural drawings, Google Earth, and site plans;

3. Stationary-source noise levels were then calculated for each sensitive receptor location based on the standard point source noise-distance attenuation factor of 6.0 dBA for each doubling of distance;

4. Noise level increases were compared to the stationary source noise significance thresholds identified below; and

5. For outdoor mechanical equipment, the maximum allowable noise emissions from any and all outdoor mechanical equipment were specified such that noise levels would not exceed the significance threshold of 5 dBA identified below.

(4) Ground-Borne Vibration (Construction and Operation)

Ground-borne vibration impacts were evaluated by identifying potential vibration sources, measuring the distance between vibration sources and surrounding structure locations, and making a significance determination based on the significance thresholds described below.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts with regard to Noise Impacts. These questions are as follows:

Would the project result in:

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

- Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial permanent increase in ambient noise levels in the vicinity of the project above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

(1) Construction

The following thresholds of significance are set forth in the City of L.A. CEQA Thresholds Guide (2006), which states that a project would normally have a significant impact on noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise-sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on Sunday.

Since the project construction period would have a duration of more than 10 days and would not occur between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on Sunday (consistent with provisions of the LAMC), noise during construction would have a significant impact if:

Noise 1 Project construction activities cause the exterior ambient noise level to increase by 5 dBA or more at a noise-sensitive use, as measured at the property line of any sensitive use

(2) Operation

The *City of L.A. CEQA Thresholds Guide (2006)* provides guidelines for defining significant noise impacts due to operations. The Los Angeles guideline states that a significant impact related to operational noise would result if:

Noise 2 The proposed project would cause ambient noise levels to increase by 5 dBA CNEL or more and the resulting noise falls on a land use within an area categorized as either "normally acceptable" or "conditionally acceptable" (see Table IV.I-2 for description of these categories); or

Noise 3 The proposed project would cause ambient noise levels to increase by 3 dBA CNEL or more and the resulting noise falls on a land use within an area categorized as either "normally unacceptable" or "clearly unacceptable."

Noise 4 Project-related operational (i.e., non-roadway) noise sources such as outdoor building mechanical/electrical equipment increase ambient noise level by 5 dBA, thus causing a violation of the City Noise Ordinance.

In addition, the City of Los Angeles Noise Ordinance provides guidance for calculation of short term annoying sounds of the type that could be generated within the project's parking structure. Accordingly the following threshold would apply:

Noise 5 The maximum noise (Lmax) generated from the operation of the parking structure (i.e., car alarm) exceeds the average (Leq) ambient noise level by 10 dBA.

(3) Ground-Borne Vibration

The City of Los Angeles does not have a significance threshold to assess vibration impacts during construction. Thus, the FTA and Caltrans standards described above are used to evaluate potential impacts related to project construction. All structures that are located within the immediate vicinity of the project site are considered "well engineered" (as opposed to "fragile" or "extremely fragile"). Therefore, impacts relative to ground-borne vibration would be considered significant if the following future event were to occur:

Noise 6 Potential Building Damage - Project construction activities cause ground-borne vibration levels to exceed 0.5 inch per second PPV at the nearest off-site building.

Noise 7 Potential Human Annoyance - Project construction and operation activities cause ground-borne vibration levels to exceed 75 VdB at the Science and Technology Center; or 72 VdB at nearby residential development.

Noise 8 Potential Impact on Vibration Sensitive Equipment Use - Project construction activities cause ground-borne vibration levels to exceed 65 VdB (0.002 inch per second RMS) at the Science and Technology Center.

c. Project Design Features

As noted in Section II., Project Description, project design features would be implemented by the Applicant as Conditions of Approval during design, construction and operation of the proposed project. The following project design features would be implemented as Conditions of Approval to reduce the level of noise generated by the project during construction and operations. These project design features were therefore taken into account in the analysis of potential project impacts.

(1) Construction

- The project contractor(s) shall equip all construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards.
- All construction equipment shall be stored on-site.
- All heavy truck traffic shall enter and exit the project site near its northwest corner, thus avoiding the use of local streets south of Santa Monica Boulevard.

- An approximately 20-foot temporary noise barrier/wall capable of reducing noise by at least 15 dBA shall be erected along the southern edge of the project site adjacent to the Science and Technology Center, and a 12-foot sound wall shall be located along Moreno Drive.
- Anticipated extraordinary noise activities shall be coordinated with the BHHS school representatives. The Applicant shall coordinate with BHHS to limit noise-generating construction activities during school activities that require a very quiet environment, like testing.
- The project shall limit construction hours to 7:00 A.M. to 9:00 P.M. on weekdays only, with no construction on weekends. Hauling shall be limited to the hours of 8:30 A.M. to 4:30 P.M. and would be scheduled to alleviate congestion at peak school times.

(2) Design Features to Reduce Operation Impacts

- Outdoor mounted mechanical and electrical equipment in the vicinity of sensitive receptors shall be designed with appropriate noise control devices, such as sound attenuators, or acoustics louvers.
- All rooftop mechanical equipment shall be enclosed or screened from view with parapet screening.
- Loading docks and trash/recycling areas shall be enclosed within the project buildings.

d. Analysis of Project Impacts

Impacts of the project due to noise from project activities would, for the most part, be similar for development with the Conventional Parking Option and with the Automated Parking Option. For construction, both parking options would require similar excavation and grading for site preparation, similar foundation work, and substantially similar building erection programs. The maximum noise level on a given day, the basis of the analysis below, would be the same for both programs. Construction noise levels for the Automated Parking Option would be slightly reduced due to its smaller ancillary building, and reduced building erection. Further, noise impacts associated with the parking structure during project operations, e.g. horns, screeching wheels, etc., would not occur, as automobiles would be shut off and left at the entry-way to be moved by electronic conveyance systems. Otherwise, noise due to project operations would be the same under both options, since both options would have similar site uses and generate the same amount of traffic. As such, the following analysis addresses the impacts of both the Conventional Parking Option and the Automated Parking Option.

(1) Construction Noise

(a) On-Site

Noise impacts from construction activities are generally a function of the noise generated by construction equipment, the equipment location, the sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Construction activities at the project site would include four stages: (1) mass grading; (2) fine grading and foundation work; (3) building construction; and (4) paving. Each stage involves the use of different kinds of construction equipment, and therefore has its own distinct noise characteristics. Grading typically involves the use of such equipment as a rubber tired loader, backhoe, excavator, rubber tire dozer, drill rig, and other equipment. Fine grading and foundation work involves the use of such equipment as a rubber tired dozer, loader, tractor, backhoe, concrete pump truck, and water truck. Building construction typically involves the use of such equipment as cranes, forklifts, a skid steer loader, backhoes, generators, welders, concrete/industrial saws, concrete pumps and aerial lifts. Paving requires the use of cement and mortar mixers, pavers and paving equipment, and rollers. The proposed

project would be constructed using typical construction techniques. No blasting or impact pile driving would be used.

Construction of the proposed project is estimated to last approximately three years. The existing project site does not require any demolition activities, however one mass site grading phase is expected for debris removal, as well as preparation of the ground for the one level of partially subterranean parking. This phase of construction activity includes the export of 11,000 cubic yards of soil during excavation. Foundations and concrete pouring would take approximately 12 months to complete and would overlap with the building construction/finishing which would take approximately 30 months.

Individual pieces of construction equipment that would likely be used for project construction produce maximum noise levels of 73 dBA to 90 dBA at a reference distance of 50 feet from the noise source, as shown in **Table IV.I-9**, *Maximum Noise Levels and Estimated Usage of Typical Construction Equipment*. Pile driving systems and equipment would not be used. These maximum noise levels would occur when equipment is operating under full power conditions or during "impact" activities, such as jack hammering or sawing. However, equipment used on construction sites often operate under less than full power conditions, or part power. To more accurately characterize construction-period noise levels, the average (Hourly L_{eq}) noise level associated with each construction stage is calculated based on the quantity, type, and usage factors for each type of equipment that would be used during each construction stage and are typically attributable to multiple pieces of equipment operating simultaneously.

Using the conservative industry standard sound attenuation rate of 6 dB per doubling of distance for point sources (e.g., construction equipment), the worst-case construction-period noise levels were estimated at the noise sensitive receptors by phase of construction activity. A summary of noise level increases by receptor location and phase of construction activity is provided in **Table IV.I-10**, *Estimate of Construction Noise Levels at Off-Site Sensitive Receiver Locations*. The estimated noise levels represent a worst-case scenario and the actual sound occurring at various locations would be less than that indicated in Table IV.I-10 due to four factors: 1) the construction activities are analyzed as if they were occurring along the perimeter of the project site, whereas construction would typically occur throughout the site and only periodically at the perimeter of the site; 2) there are times when the construction activities are fewer than the maximums identified here; 3) there are times when the construction equipment operates at less than full power level, and 4) noise sensitive receptors that are located farther away from the project site would experience less construction noise, as sound diminishes away from the source, and due to intervening buildings between the source and receiver.

Estimates of the greatest impacts that might occur during construction hours at nearby sensitive receptors are shown in Table IV.I-10. The closest sensitive uses to the project site are a residential unit located across Moreno Drive (R2) and BHHS located adjacent to the south side of the project site (R3). Estimated noise levels are also shown in Table IV.I-10 for a location on Durant Drive approximately 300 feet east of the project site.

As indicated in Table IV.I-10, the maximum noise events would exceed the significance threshold limits at the outside locations shown in the table. As also indicated, the sound diminishes with distance. At a distance of 300 feet from the project site, a distance that includes several residential units along Durant Drive and no

Table IV.I-9

Maximum Noise Levels and Estimated Usage of Typical Construction Equipment

Type of Equipment	Estimated Usage Factor	Reference Noise Level at 50 feet, L_{max}
Air Compressor	40 – 50%	78
Backhoe, Loader, Tractor	25 – 50%	80
Cement and Mortar Mixers	10%	80
Concrete Pump	25 – 50%	81
Concrete Truck	25 – 40%	79
Concrete Saw	50%	90
Crane	25 – 50%	81
Dozer	40%	82
Drill Rig	25%	80
Excavator	25 – 40%	81
Forklift	10%	75
Generator	40 – 50%	81
Lift	20%	75
Rubber Tired Loader	50%	79
Dump / Haul Truck	20%	76
Other Equipment	50%	85
Paver	50%	77
Pavement Scarifier	20%	90
Roller	20%	80
Tractor / Loader / Backhoe	25%	80
Water Truck	10%	80

Source: FHWA 2005; and PCR Services Corporation, 2011.

residential development farther south along Moreno Drive, the greatest sound levels have fallen to levels near the significance threshold.

Likewise, the sound would be similarly diminished at locations within the high school as the distance from the project site increases. Noise from the project site at the high school's sensitive outdoor areas would also be reduced by intervening buildings. For example, the school lawn area is located approximately 500 feet from the project site, and is partially obstructed from direct sound by existing school buildings, most notably the Science and Technology Center. The area between the Science and Technology Center and the proposed project site, is a driveway road without noise sensitive activity, although students would walk in the vicinity of the project site coming and going to classes. As indicated in Table IV.I-10, the greatest sound levels would exceed the significance threshold.

A temporary 20-foot wall would be installed along the project boundary adjacent to the high school which would provide a 15 dB noise reduction, when the noise barrier breaks the line-of-sight between the construction equipment and the receivers. Thus, the noise barrier would lessen impacts at ground level. The barrier would also reduce sound levels for all four floors of the Science and Technology Center from sound sources located along the edge of the project. However, as work activities occur deeper within the project site, the barrier would only break the line-of-sight for the 1st and 2nd floors of the Science and Technology

Table IV.I-10

Estimate of Construction Noise Levels at Off-Site Sensitive Receiver Locations

Noise Sensitive Receptor [a]	Nearest Distance from Construction Activity to Noise Receptor	Estimated Construction Noise Levels at the Noise Sensitive Receptor by Construction Phase [b] Hourly L_{eq} (dBA)				Project's Significance Threshold[c] (dBA)	Would Construction Noise Exceed Significance Threshold? (dBA)
		Mass Grading (2 months)	Fine Grading/Foundation (12 months)	Building Construction (30 months)	Paving (1.5 months)		
R2 – Nearest residential (east of project site) [f]	60 feet	79	75	81	66	61	Yes
R3 - Science & Technology Center – Exterior – 3rd & 4th Floors	25 feet/50 feet [d]	77/86	73/82	79/88[f]	73 [d]	57	Yes
R3 - Science & Technology Center – Exterior – 1st & 2nd Floors	25 feet/50 feet [d]	77/71	73/67	79/73	58[d]	57	Yes
R4 – Residential uses (southeast of project site)[e]	300 feet	60	56	62	56	60	Yes

[a] *Construction noise levels at R1 are not estimated since R1 represents the noise environment at the project site.*

[b] *Estimated construction noise levels represent the worst-case scenario when noise generators are located closest to the receptors and are not expected to last the entire construction duration.*

[c] *Measured ambient noise levels for daytime weekday conditions (there is no construction on nights or weekends) plus 5 dBA.*

[d] *Sound levels along the northern edge of the project site and 25 feet within the project site (ie. 25 feet and 50 feet from the Science and Technology Center). Paving activities would not occur within this area and the sound levels shown are at a distance of 200 feet to the area where site paving would be provided.*

[e] *Partially shielded from the project site by existing buildings, also inclusive of a 5 dBA reduction for the proposed sound barrier that would be located along Moreno Drive.*

[f] *Inclusive of 5 dBA reduction for sound barrier.*

Source: PCR Services Corporation, 2011.

Center and the temporary noise barrier would not be effective (break the line-of-sight) for the upper stories (i.e., the 3rd and 4th floors) of that building. Therefore, the greatest sound impacts to the Science and Technology Center would occur at 50 feet from the building (i.e. 25 feet within the project site), not the edge of the project site, and would be experienced at the building's 3rd and 4th floors.

In addition to these sensitive uses where the greatest project impacts would occur, there may be a lesser impact at a nearby, private, rooftop recreation deck at an adjacent 7 story parking structure. Impacts would be less than those at the more sensitive uses discussed above, due to height distance and that building's walls

acting as a sound barrier between construction noise generation at ground level and the lower levels of new structures, and the roof top uses, particularly in closer vicinity to those roof-top uses.

(b) Off-Site

In addition to on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the project site throughout the project's construction period. While construction workers would arrive from many parts of the region, and thus different directions, haul trucks and delivery trucks would generally access the site via a planned route intended to minimize noise impacts to areas south and east of the project site. All heavy truck traffic would come from the west on Santa Monica Boulevard and enter and exit the project site at its northwest corner.

By limiting the access to the site for heavy trucks/equipment to its northwest corner, all such traffic would avoid passing in the proximity of the sensitive residential and school uses located along Moreno Drive. Therefore, the off-site noise from such traffic would be less than significant.

(2) Construction Vibration

Construction machinery and operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The construction activities that typically generate the most severe vibrations, blasting and impact pile driving, would not be used for this project. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. Ground-borne vibration from construction activities rarely reach the levels that damage structures. The Federal Transit Association (FTA) has published standard vibration velocities, in terms of PPV, for construction equipment operations. The typical vibration PPV and RMS levels for construction equipment pieces anticipated to be used during project construction are listed in **Table IV.I-11**, *Typical Vibration Velocities for Potential Project Construction Equipment*.

Table IV.I-11

Typical Vibration Velocities
for Potential Project Construction Equipment

	Reference Vibration Source Levels	
Equipment	**PPV at 25 feet**	**VdB at 25 feet**
Large bulldozer	0.089	87
Caisson drilling	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58

Source: USDOT Federal Transit Administration, 1995.

The proposed project would generate ground-borne vibration during site clearing, grading and foundation construction; and lesser vibration associated with general building construction. The estimated vibration levels at the sensitive receptor locations (V1) the Science and Technology Center, and V(2) and (V3) residential locations east of the project site are shown in **Table IV.I-12**, *Estimate of Construction Vibration Levels at Off-Site Sensitive Receiver Locations.*

Table IV.I-12

Estimate of Construction Vibration Levels at Off-Site Sensitive Receiver Locations

Vibration Sensitive Receptor	Nearest Distance from Construction Activity to Vibration Receptor	Estimated Construction Vibration Levels at the Noise Sensitive Receptor by Construction Phase [a]				Significance Threshold		
		Mass Site Grading (2 month) (PPV/VdB)	Fine Site Grading/ Foundations (12 months) (PPV/VdB)	Building Construction (30 months) (PPV/VdB)	Paving (1.5 months) (PPV/VdB)	Building Damage (PPV)	Human Annoyance (VdB)	Vibration Sensitive Equipment (VdB)
V1 –Science & Technology Center	25 feet Exterior/ Interior [b]	0.089/77 [c]	0.089/77 [c]	0.024/69 [c]	0.004/58 [c]	0.5	75VdB	65
V2 - Nearest Residential (east of project site)	60 feet Exterior/ Interior [b]	0.024/74 [d]	0.024/74 [d]	0.020/73 [d]	0.003/61 [d]	0.5	72VdB	--[e]
V3 - Residential uses (southeast of project site)	300 feet Exterior/ Interior [b]	0.002/61	0.002/61	0.002/59	0.001/56	0.5	72VdB	--[e]

[a] *Estimated construction vibration levels represent the worst-case scenario when vibration generators are located closest to the receptors and infrequent, greatest impact construction activities are occurring.*

[b] *Exterior PPV values are used for evaluating potential impacts on buildings. VdB values are used for evaluating potential impacts regarding human annoyance and sensitive scientific equipment effects.*

[c] *Inclusive of a 10 VdB reduction loss in vibration level due coupling loss associated with a 2 – 4 story masonry building per FTA guidelines.*

[d] *Inclusive of a 5 VdB reduction loss in vibration level due coupling loss associated with a residential building per FTA guidelines*

[e] *Not evaluated for vibration sensitive equipment uses at residential receptors.*

Source: PCR Services Corporation, 2008.

As indicated, the greatest exterior vibration level at any location is estimated to be 0.089 PPV. This level of vibration is substantially below the 0.5 PPV threshold for potential building impacts. Therefore, potential impacts on buildings due to vibration would be less than significant at all locations.

Potential interior vibration levels for two residential locations (V2) and (V3) are included in Table IV.I-12 to address potential impacts regarding potential annoyance impacts in the nearby neighborhood. As indicated, the greatest level of interior vibration at the residential unit nearest to the project site would be 74 VdB. This is the greatest impact that could occur from high vibration construction equipment working at the

eastern edge of the project site; an event that would not be associated with most of the construction activities on the project site. This level of vibration would exceed the significance threshold of 72 VdB for frequent vibration at residences/buildings where people normally sleep. It would be within the 80 VdB standard for infrequent events and within the frequent event 75 VdB threshold associated with primarily day time uses. The project's maximum impact would occur infrequently over the duration of the course of project construction, would not occur during night-time hours, and would not be generally expected to impact sleeping activities. Impacts at other residential development would be substantially less than that noted for the closest residential unit. The next two closest residential units are located approximately 120 feet from the project. At those locations, the interior vibration level would be reduced to 68 VdB. For these reasons, the level of vibration experienced in the nearby neighborhood would minimal. Notwithstanding, it is conservatively concluded that the estimated 74 VdB would be significant prior to mitigation. A mitigation measure is included below to reduce this potential impact to a less than significant impact.

As indicated in Table IV.I-12, the estimated interior vibration within the Science and Technology Center (V1) is estimated to be 77 VdB during those times when the most intense vibration equipment is operated along the edge of the project site. This maximum level of vibration is marginally above the 75 VdB frequent event vibration threshold for human annoyance in institutional settings. It is within the 78 VdB threshold for occasional events at such institutional uses. This worst-case level of vibration diminishes as vibration activity moves away from the Science and Technology Center and falls below the 75 VdB threshold at about 35 feet of distance (or 10 feet into the project site). The 77 VdB would also exceed the project's significance threshold of 65 VdB for vibration sensitive equipment. As such, vibration impacts associated with construction could potentially be significant, prior to mitigation, if vibration sensitive scientific equipment were being operated in the vicinity of the project site. In this worst-case scenario where construction equipment is operating at the perimeter of the project site, vibration impacts regarding the use of sensitive equipment would be reduced to a less than significant level at approximately 100 feet from the Science and Technology Center, or at a distance of 75 feet within the project site. Mitigation measures are included below to reduce potential vibration impacts at the Science and Technology Center.

(3) Operational Noise

Operational project impacts to neighboring noise-sensitive receptor locations include noise that would be generated by off-site roadway noise, on-site mechanical equipment/point sources (i.e., loading dock and trash pick-up areas), parking facilities, outdoor recreation activities and rooftop helipad-related noise.

(a) Off-Site Roadway Noise

As described in Section IV.K of the Draft EIR, the proposed project is estimated to generate 1,189 daily trips. This change in roadway traffic volumes was analyzed to determine if traffic-related noise impacts would result from project development. **Table IV.I-13**, *Off-Site Traffic Noise Analysis*, provides a summary of the off-site roadway noise analysis results. Included in this table are calculated CNEL noise levels at a reference distance of 25 feet for the roadway segments with noise sensitive uses for the following scenarios: (1) existing conditions; (2) future without project; and (3) future with project. The project-generated traffic noise impact is determined by comparing the increase in noise levels (from future without project to future with project) and the project's significance threshold.

As shown in Table IV.I-13, the existing maximum increase in project-related traffic noise levels would be 0.5 dBA, which would occur along Santa Monica Boulevard between Century Park East and Moreno Drive.

Table IV.I-13

Off-Site Traffic Noise Analysis

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway Right-of-Way, CNEL (dBA)						
	Existing (A)	Existing with Project [a] (B)	Future No Project [a] (C)	Future with Project [a] (D)	Existing Project Increment [a] (B-A)	Future Project Increment [e] (D-C)	Cumulative Increment [f] (D-A)
Santa Monica Boulevard							
West of Century Park West	70.4	70.4	71.3	71.3	0.0	0.0	0.9
Between Century Park West & Century Park East	70.0	70.0	70.9	70.9	0.0	0.0	0.9
Between Century Park East & Moreno Dr.	70.2	70.7	70.9	71.0	0.5	0.1	0.8
Between Moreno Dr. & Wilshire Blvd.	69.2	69.2	69.8	69.8	0.0	0.0	0.6
Between Wilshire Blvd. & Beverly Dr.	70.1	70.1	70.9	70.9	0.0	0.0	0.8
East of Beverly Dr.	69.9	69.9	71.1	71.2	0.0	0.1	1.3
South Santa Monica Boulevard							
Between Century Park East & Moreno Dr.	72.3	72.4	73.0	73.1	0.1	0.1	0.8
Wilshire Boulevard							
Northwest of Santa Monica Blvd.	71.0	71.0	71.7	71.7	0.0	0.0	0.7
Olympic Boulevard							
Between Overland Ave. & Prosser Ave.	65.0	65.0	65.5	65.5	0.0	0.0	0.5
Between Prosser Ave. & Beverly Glen Blvd.	68.1	68.1	68.5	68.5	0.0	0.0	0.4
Between Beverly Glen Blvd. & Century Park West	71.2	71.2	71.5	71.5	0.0	0.0	0.3
Between Century Park West and Century Park East	66.7	66.7	67.2	67.2	0.0	0.0	0.5
Between Century Park East & Spalding Dr.	60.1	60.1	61.2	61.2	0.0	0.0	1.1
East of Spalding Dr.	61.8	61.9	63.2	63.2	0.1	0.0	1.4
Roxbury Drive							
North of Santa Monica Blvd.	60.4	60.4	60.6	60.6	0.0	0.0	0.2
North of Olympic Blvd.	59.4	59.4	59.6	59.6	0.0	0.0	0.2
South of Olympic Blvd.	59.8	59.8	60.0	60.0	0.0	0.0	0.2
Roxbury Drive/Brighton Way							
South of Wilshire Blvd.	59.8	59.8	60.0	60.0	0.0	0.0	0.2
Bedford Drive							

Table IV.I-13 (Continued)

Off-Site Traffic Noise Analysis

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway Right-of-Way, CNEL (dBA) Existing (A)	Existing with Project [a] (B)	Future No Project [a] (C)	Future with Project [a] (D)	Existing Project Increment [a] (B-A)	Future Project Increment [e] (D-C)	Cumulative Increment [f] (D-A)
North of Santa Monica Blvd.	60.3	60.3	60.6	60.6	0.0	0.0	0.3
Prosser Avenue							
North of Olympic Blvd.	58.4	58.4	58.6	58.6	0.0	0.0	0.2
South of Olympic Blvd.	58.3	58.3	58.6	58.6	0.0	0.0	0.3
Beverly Glen Boulevard							
North of Santa Monica Blvd.	69.2	69.2	69.5	69.5	0.0	0.0	0.3
Between Santa Monica Blvd. & Olympic Blvd.	67.2	67.2	67.6	67.6	0.0	0.0	0.4
South of Olympic Blvd.	65.6	65.6	66.2	66.2	0.0	0.0	0.6
Veteran Drive							
North of Santa Monica Blvd.	64.4	64.4	64.7	64.7	0.0	0.0	0.3
South of Santa Monica Blvd.	63.4	63.4	63.6	63.6	0.0	0.0	0.2
Overland Avenue							
Between Santa Monica Blvd. & Olympic Blvd.	66.3	66.3	67.3	67.3	0.0	0.0	1.0
South of Olympic Blvd.	68.2	68.4	69.3	69.3	0.2	0.0	1.1
Century Park West							
Between Santa Monica Blvd. & Constellation Ave.	64.7	64.7	65.6	65.6	0.0	0.0	0.9
Between Constellation Ave. & Olympic Blvd.	65.7	65.8	66.6	66.6	0.1	0.0	0.9
Century Park East							
Between Olympic Blvd. & Pico Blvd.	66.5	66.5	66.7	66.7	0.0	0.0	0.2
Spalding Drive							
North of Olympic Blvd.	63.2	63.4	63.7	63.7	0.2	0.0	0.5
South of Olympic Blvd.	58.1	58.1	58.4	58.4	0.0	0.0	0.3
North of Moreno Dr.	62.7	62.8	62.9	63.0	0.1	0.1	0.3
Avenue of the Stars							
Between Santa Monica Blvd. & Constellation Ave.	69.3	69.3	70.7	70.7	0.0	0.0	1.4
Between Constellation Ave. & Olympic Blvd.	69.9	69.9	71.0	71.0	0.0	0.0	1.1
Moreno Drive							
Between Santa Monica Blvd. & Durant Dr.	61.9	62.2	62.2	62.5	0.3	0.3	0.6
South of Durant Dr.	63.1	63.2	63.3	63.5	0.1	0.2	0.4
Durant Drive							

Table IV.I-13 (Continued)

Off-Site Traffic Noise Analysis

Roadway Segment	Calculated Traffic Noise Levels at 25 feet from Roadway Right-of-Way, CNEL (dBA) Existing (A)	Existing with Project [a] (B)	Future No Project [a] (C)	Future with Project [a] (D)	Existing Project Increment [a] (B-A)	Future Project Increment [e] (D-C)	Cumulative Increment [f] (D-A)
East of Moreno Dr.	61.2	61.3	61.4	61.5	0.1	0.1	0.3
Pico Boulevard							
West of Beverly Glen Blvd.	72.7	72.7	73.2	73.2	0.0	0.0	0.5
Between Beverly Glen Blvd. and Motor Ave.	72.7	72.7	73.1	73.1	0.0	0.0	0.4

[a] *Include existing plus proposed project traffic.*
[b] *Include future growth plus related (cumulative) projects identified in the traffic study .*
[c] *Include future growth plus related (cumulative) projects and proposed project traffic.*
[d] *Increase due to Project-related traffic only at existing.*
[e] *Increase due to Project-related traffic only at project build-out.*
[f] *Increase due to future growth, related (cumulative) projects, and project traffic.*

Source: PCR Services Corporation, 2011.

As the 0.5 dBA at one location increase falls well below the more conservative 3 dBA CNEL significance threshold and would not be perceptible, roadway noise level increases would be less than significant. No mitigation measures are required. It may also be noted that the existing ambient CNEL levels in the project vicinity are the highest along Santa Monica Boulevard. The proposed project buildings would act as a sound barrier to existing noise source on Santa Monica Boulevard, thus reducing some sound that reaches the high school and residential areas south of the project site.

(b) Stationary Point-Source Noise

This section considers potential noise impacts to neighboring noise-sensitive properties related to specific noise sources associated with the operation of the proposed project. Such potential noise sources include:

- Outdoor mounted mechanical and electrical equipment (e.g., heating, ventilation, and air conditioning [HVAC] equipment and emergency generator);
- Loading dock and trash/recycling areas;
- Parking facilities;
- Outdoor Open Space, and
- Emergency Helipad

A discussion of each of these noise sources is provided below, followed by a discussion of the potential composite noise level increase (due to concurrent operation of multiple noise sources) at each sensitive receptor location.

(i) Mechanical Equipment

The proposed project would likely require building mechanical HVAC equipment to condition and ventilate the indoor air environment. This equipment would be expected to include air handling units, condenser fans, exhaust fans (for buildings and parking structures), a standalone central plant building located at the southwest corner of the site containing chillers/ cooling towers and pumps, and an emergency generator room within the parking structure to support the intended function of the proposed project. Project design features, including enclosure or screen/parapet wall, would ensure that all equipment noise levels would comply with the City of Los Angeles Noise Ordinance requirements (i.e., noise levels would result in a maximum 5 dBA increase above the ambient noise levels). Thus, impacts associated with mechanical equipment would be less than significant. No mitigation measures are required.

(ii) Loading Dock and Refuse Collection Areas

The proposed project's loading dock and refuse collection areas would be within the northwestern portion of the site; and located within the project's structure off of Santa Monica Boulevard. As such, loading docks and refuse collection would not have any unobstructed openings that face toward any noise-sensitive receptor location. Therefore, noise level increases would not exceed the 5 dBA Leq (1-hour) significance threshold at the closest or any other off-site noise-sensitive receptor location. As such, impacts would be less than significant, and no mitigation measures would be required.

(iii) Parking Facility Noise Levels

The project's partially subterranean parking level would be sheltered and therefore would not result in noise impacts at any noise-sensitive receptor locations. The parking in the ancillary building, (9 stories under the Conventional Parking Option and 4 stories under the Automated Parking Option) would have limited openings toward the residential and school uses (R2 and R3) located to the eastern and southern sides of the site, respectively. Various noise events would occur periodically from the parking facilities. Such periodic events would include activation of car alarms, sounding of car horns, slamming of car doors, engine revs, and tire squeals. Automobile movements would comprise the most continuous noise source and would generate a noise level of approximately 65 dBA at a distance of 25 feet. Car alarm and horn noise events generate sound levels as high as 83 dBA at a reference distance of 25 feet, however these noise sources would be sporadic and primarily limited to the daytime. Impacts such as these would be associated with the proposed project's Conventional Parking Option, but would be reduced with the Automated Parking Option, as cars would be shut off at the garage entry and conveyed via electric mechanisms.

The nearest residential uses and school use, R2 and R3, are approximately 275 feet and 60 feet from east and south of the proposed parking structure, respectively. Based on a noise level source strength of 83 dBA at a reference distance of 25 feet, and accounting for barrier-insertion loss from the parapet wall at the perimeter of the proposed parking structure (minimum 10 dBA insertion loss) and distance attenuation (minimum 21 dBA loss for 275 feet of distance and minimum 8 dBA loss for 60 feet distance), parking related noise would be reduced to 52 dBA (Lmax) at the R2 residential development across Moreno Drive and 65 dBA at R3, at the Science and Technology Center, the closest high school location. The estimated noise levels would exceed the current Leq nighttime ambient level of 48 dBA by 4 dBA at the R2 adjacent residential uses and

would not exceed the 10 dBA threshold of significance for maximum noise (Lmax) levels at the residential uses. The nearest school location where the 65 dBA would occur is a driveway with its own traffic noise, possible horn honking, etc., which ties into other road/access ways (e.g. Moreno Drive). More sound sensitive locations within the high school would be blocked from parking structure sounds by existing buildings which would provide at least 10 dBA reduction in sound. There would be additional sound attenuation due to the distance to the more sensitive uses. For example, the distance to the corner of the Science and Technology Center along Moreno Drive provides 160 feet or an additional 8 dBA of attenuation. The existing building attenuation alone would reduce the 65 dBA to 55 dBA which is well below the 62 dBA threshold that is based on a 10 dBA increment over the existing weekday ambient level. An additional 8 dBA of attenuation, for example would reduce the level to 48 dBA.

(iv) Outdoor Open Space Areas

Project residents would perform passive activities within the project's landscaped open space area; and recreation activities such as swimming and court games on the roof-deck recreation area. These would be low intensity uses which would generate low levels of noise. Further, the more active roof-top activities would be located along the western edge of the project site, thus separated from the sensitive off-site uses to the east and southeast. Such impacts would not increase ambient noise levels at off-site receptors and would be less than significant.

(v) Rooftop Helipad Noise Levels

The proposed project would include an emergency helipad pursuant to LAMC requirements.[16] As such, the helipad would be used for emergency purposes only. Due to infrequent use and the emergency nature of such a use, adverse noise impacts related to helipad uses would be less than significant.

(vi) Composite Noise Level Impacts from Project Operations

An evaluation of noise from all proposed project sources (i.e., composite noise level) was conducted to conservatively ascertain the potential maximum project-related noise level increase that may occur at the noise-sensitive receptor locations included in this analysis. The overall sound environment at the areas surrounding the project is comprised of contributions from each individual noise source associated with the typical daily operation of the proposed project. Primary noise sources associated with the project would include noise associated with traffic, mechanical equipment, the parking facility, and loading dock/refuse collection.

The only noise-sensitive locations where composite noise impacts could occur are at the residential uses east of the project site (R2) and school uses south of the project site (R3). Other noise sensitive receptors, which are located at a distance from the project site, and which are shielded from project noise by intervening structures, would only be impacted by the project's roadway noise, the potential impacts of which are fully analyzed above.

The noise analysis for different project sources (i.e., off-site traffic, on-site mechanical/electrical equipment, parking facility and loading dock/refuse collection) were made using various noise descriptors (i.e., 24-hour

[16] *City of Los Angeles Municipal Code Section 57.118.12 requires that buildings over 75 feet in height be equipped with an emergency helipad.*

CNEL, 1-hour L_{eq}, and instantaneous L_{max}). However, in order to evaluate the combined noise effect of all sources a common noise descriptor, CNEL, is used. Based on the traffic noise analysis above, the project-related traffic would not increase the traffic-related noise in the vicinity of the project site. Project-related mechanical equipment, as described above, would be shielded from all noise sensitive receptors through project design features and also would be designed to meet the City's Noise Ordinance (i.e., allowing a maximum of 5 dBA above ambient noise levels). The mechanical equipment related noise was analyzed in terms of hourly L_{eq}. Therefore, a conversion from L_{eq} to CNEL is made in order to be added to the traffic noise level. As indicated in Table IV.I-1 on page 5, the lowest measured hourly L_{eq} ambient noise levels at R2 and R3 (48 and 45 dBA, respectively) are at least 12 dBA lower than the measured 24-hour CNEL levels (recorded 61 dBA at R2 and 57 dBA at R3). Therefore, it is anticipated that by meeting the City's Noise Ordinance in terms of hourly L_{eq} (maximum of 5 dBA above the lowest ambient noise levels), the project mechanical-related noise in terms of CNEL would be approximately 10 dBA below the existing ambient noise levels. The new parking structure is partially enclosed (i.e., parking garage with limited openings) and the parking facility noise would not exceed the existing ambient noise levels at the sensitive receptor R2 by 10 dBA and the interior noise standards for classrooms inside the high school Science and Technology Center. Therefore, parking related noises would be less than significant. As previously mentioned, the loading docks and refuse collections areas would be located within the northwestern portion of the project site, which would not have any unobstructed openings that face toward any noise-sensitive receptor locations. Therefore, noise associated with the loading docks and refuse collection transference to the outside would be negligible and would not increase the overall ambient noise levels.

In summary, the project-related traffic would not increase the ambient noise in the vicinity of the project site. The mechanical and parking facility related noise are expected to be well below the existing ambient noise level (i.e., minimum 10 dBA CNEL). Therefore, the overall noise level from all project sources would have a less than 1.0 dBA CNEL contribution to the composite noise environment. Overall, relative to the existing noise environment, the proposed project is estimated to increase the ambient sound level at the nearest noise sensitive receptors (R2 and R3) by less than 1 dBA (CNEL), which is considered less than perceptible. Composite noise impacts at all other receptors are expected to be less 1 dBA (CNEL). As such, the composite noise level impact due to the proposed project's operations would be less than significant.

(4) Vibration Associated with Project Operation

The proposed project would include typical residential and commercial-grade stationary mechanical and electrical equipment such as air handling units, condenser units, exhaust fans, cooling towers, and electrical emergency power generators, which would produce vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking facilities, on-site refuse/delivery truck activity, and on-site loading dock/refuse collection area activity. Vibration levels were analyzed to assess potential impacts at the nearest adjacent structure (BHHS represented by V1) located approximately 85 feet away from a proposed driveway; and approximately 250 feet from the project's loading and truck delivery location.

Ground-borne vibration generated by each of the above-mentioned activities were estimated using vibration measurement data collected at existing off-site facilities, including parking facilities, refuse/delivery truck ingress/egress paths, and loading dock/refuse collection areas, that are similar to the proposed on-site structures. These measured vibration values and estimated levels at the nearest receptor (V1) are shown on **Table IV.I-14**, *Project Operational Vibration Analysis*. As indicated on Table IV.I-14, the estimated vibration

Table IV.I-14

Project Operational Vibration Analysis

Vibration Sources	Measured Maximum Vibration Velocity inch/second RMS	Approximate Distance from Vibration Sources to nearest Receptor (V1)	Estimated Maximum Vibration Velocity at nearest Receptor (V1) inch/second RMS/VdB
Parking structure and surrounding roadways	0.002 @ reference distance of 35 feet	60 feet	0.0009/59
Refuse/delivery truck circulation	0.008 @ reference distance of 15 feet	250 feet	0.0001/40
Loading dock/refuse collection area activities	0.002 @ reference distance of 35 feet	250 feet	0.0001/40

Source: PCR Services Corporation, 2008.

levels of 0.0009 inch per second RMS (59 VdB) at the Science and Technology Center (V1) is below the 65 VdB significance threshold for vibration sensitive equipment uses (which is more stringent than the annoyance significance threshold). As such, vibration impacts associated with operation of the project would be below the significance threshold. Thus, impacts would be less than significant and no mitigation measures are required.

4. CUMULATIVE IMPACTS

As discussed in Section III of this EIR, there are 40 related projects located in the vicinity of the project site. Of the 40 related projects, the three closest are situated approximately 300 feet, 500 feet, and 600 feet from the project site including Related Project No. 20 located at 9900 Wilshire Boulevard (mixed-use), Related Project No. 23 located at 9936 Durant Drive (condominium), and Related Project No. 22 located at 9876 Wilshire Boulevard (Beverly Hilton), respectively. Other related projects are situated approximately 850 feet and 900 feet from the project site, including Related Project No. 18 located at 1950 Avenue of the Stars (office) and Related Project No. 24 located at 9900 Santa Monica Boulevard (office building), respectively. All other related projects are located a minimum of 1,500 feet away from the project site. The potential for noise impacts to occur are specific to the location of each related project, as well as the cumulative traffic on the surrounding roadway network.

a. Construction Noise

Noise from on-site construction activities are localized and would normally affect the areas within 500 feet from the individual construction site. Since the timing of the construction activities for these related projects cannot be defined and are beyond the control of the City and the Applicant, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. However, if Related Project No. 20, No. 23, and No. 22 proceed and involve construction activities at the same time as the proposed project, the multiple projects could contribute to cumulative construction noise impacts on the noise sensitive receptors that are located between the identified related projects and the proposed project, including the multi-family residential uses (R2) and the school uses (R3) along Moreno Drive. Related

Project No. 18 and Related Project No. 24 are located 850 feet and 900 feet from the project site, respectively. Intervening buildings are located between the related project and the project site. This would preclude a cumulative impact on the multi-family residential uses (R2) and the school uses (R3) along Moreno Drive.

In addition, if Related Project No. 20 and No. 23 were to be completed before the proposed project, significant construction noise impacts could occur at Related Project No. 20 and No. 23 (residential uses). However, those noise levels would be intermittent, temporary, and would cease at the end of the construction phase, and would comply with time restrictions and other relevant provisions of the LAMC. Noise associated with construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each individual project and compliance with the City's noise ordinances. Thus, even with proposed mitigation measures, if nearby related projects were to be constructed concurrently with the proposed project, significant and unavoidable cumulative construction noise impacts could result at the nearby noise sensitive receptors (R2 and R3).

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the proposed project, there is no potential for cumulative construction- or operational impacts with respect to ground-borne vibration.

b. Operational Noise

The project site and surrounding area have been developed with uses that have previously generated, and would continue to generate, noise from a number of community noise sources including vehicle travel, mechanical equipment (e.g., HVAC systems), and lawn maintenance activities. Each of the related projects that have been identified within the general project vicinity would also generate stationary-source and mobile-source noise as a result of ongoing day-to-day operations. The related projects are general residential, retail, commercial, or institutional in nature. Such uses are not typically associated with excessive exterior noise. However, each project would produce traffic volumes that are capable of generating roadway noise impacts. As shown in Table IV.I-13, above, cumulative traffic volumes would result in a maximum increase of 1.4 dBA CNEL along the segments of Olympic Boulevard east of Spalding Drive and Avenue of the Stars between Santa Monica Boulevard and Constellation Avenue. As this noise level increase would be below the conservative 3 dBA CNEL significance threshold, roadway noise impacts associated with cumulative traffic volumes would be less than significant.

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

5. MITIGATION MEASURES

a. Construction

Construction-related noise has the potential to result in significant noise and vibration impacts at sensitive receptors. Project Design Features to reduce potential noise impacts include a 20-foot sound barrier wall adjacent to Beverly Hills High School on the south side of the project site, and a 12-foot sound barrier wall on the eastern side of the project site that faces the residential development across Moreno Drive. In addition, to the provision of the sound barriers, the following mitigation measures are proposed.

Mitigation Measure I-1: Exterior on-site construction activities shall be limited to Monday through Friday from 7:00 A.M. to 9:00 P.M.

Mitigation Measure I-2: The construction staging area shall be located within the project site.

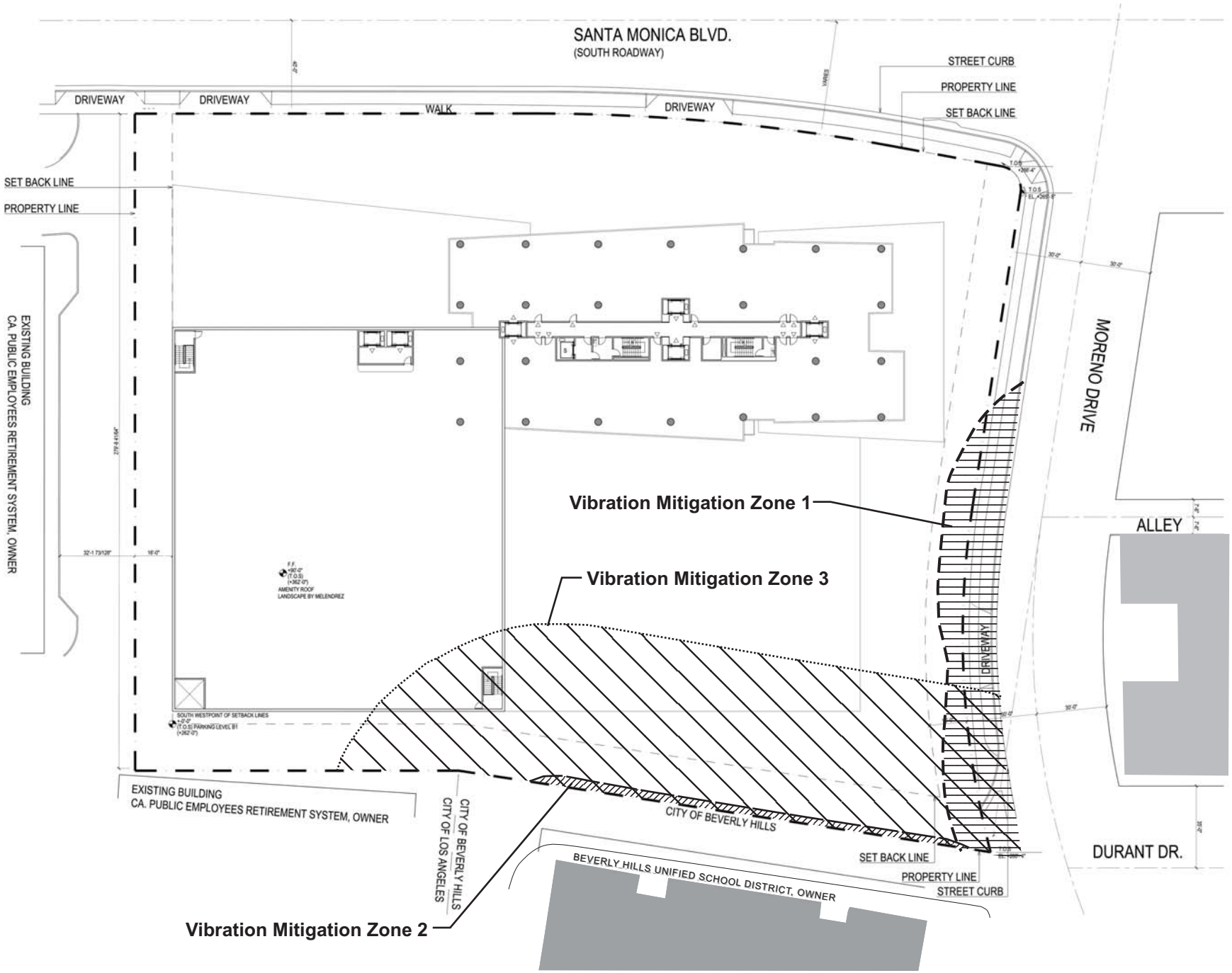
Mitigation Measure I-3: To avoid vibration impacts to the nearest residential unit to the project site, construction equipment within 75 feet of that unit (i.e. 15 feet within the project site) shall limit vibration equipment to machinery expected to generate no more than 85 VdB at 25 feet. (See Vibration Mitigation Zone 1 on **Figure IV.I-2**, *Vibration Mitigation Zones*.)

Mitigation Measure I-4: The Applicant shall designate a construction relations officer to serve as a liaison with surrounding property owners including Beverly Hills High School. The liaison shall be responsible for responding to concerns regarding construction noise or vibration. The liaison's telephone number(s) shall be posted at multiple locations along the perimeter of the project site. In addition, the liaison shall coordinate with Beverly Hills High School administration in advance of, and throughout project construction to reduce disruption of class-room activities. The liaison shall work with the School administration to identify opportunities to reduce conflicts with school activities through work scheduling and the arrangement of construction activities on the project site.

Mitigation Measure I-5: To avoid vibration impacts on student activity in the Science and Technology Center:

a) High vibration construction activities shall be avoided within 35 feet of the Science and Technology Center (i.e. along the southern 10 feet of the project site facing that building) during class-room sessions, when school is in session. (See Vibration Mitigation Zone 2 on Figure IV.I-2.)

b) If based on consultation with the administrator at Beverly Hills High School it is determined that highly sensitive equipment, e.g. microscopes, are in use at the Science and Technology Center, high vibration activities within 100 feet of that building shall be coordinated through consultation between the construction relations officer and the school administrator to reduce impacts at times of equipment use through scheduling, staging and equipment control of construction activities. (See Vibration Mitigation Zone 3 on Figure IV.I-2.)



PCR

0 64 Feet

Vibration Mitigation Zones

10000 Santa Monica Boulevard

Source: Handel Architects, LLP; PCR Services Corporation, 2011.

FIGURE
IV.I-2

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b. Operation

Operation impacts at off-site receptors would be less than significant. Therefore, no mitigation measures are required for building operations.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

a. Construction

Mitigation Measure I-1 would preclude construction noise impacts from occurring during the noise-sensitive nighttime periods, or weekends. Mitigation Measure I-2 would avoid the noise impacts associated with construction activities that might otherwise occur off-site in the vicinity of sensitive uses. Mitigation Measure I-4 would specifically lessen project impacts during critical school activities; and would generally result in a lower overall noise profile due to construction activities. However, the significance thresholds would still be exceeded during times of more intense construction activity. Thus, short-term construction noise impacts would be significant and unavoidable.

Mitigation Measure I-3 would reduce vibration impacts at nearby residential development to levels that would be less than significant. Implementation of Mitigation Measures I-4 and I-5 would reduce potentially significant vibration impacts through modification of construction activities. As the vibration analysis is extremely conservative, representing atypical maximum events, and the mitigation measures would allow impacts to be reduced, it is expected that potential vibration impacts at the Science and Technology Center would be extremely limited. Notwithstanding, since the significance thresholds may be exceeded on occasion, it is conservatively concluded that impacts would be significant and unavoidable.

b. Operation

The projects noise impacts to off-site sensitive uses during project operation are less than significant. No mitigation measures are required.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
1. FIRE PROTECTION

1. INTRODUCTION

This section analyzes the proposed project's potential effects on fire protection and emergency medical services provided by the City of Los Angeles Fire Department (LAFD). The analysis addresses fire protection facilities and services, response times, emergency access, and water "fire-flow" (i.e. water available for fire-fighting). The analysis is based, in part, on information provided by the LAFD Planning Section and the LAFD Hydrant and Access Unit. This information is included in Appendix I.2 of this Draft EIR. Information regarding fire flow capabilities is based on information from the Los Angeles Department of Water and Power (LADWP) and a Water Supply Study prepared by SEC Civil Engineers, which are included in Appendix J.1 of this Draft EIR.[1]

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) State of California

The California Code of Regulations (CCR) Title 24 (California Building Code [CBC]) is a compilation of building standards, including fire safety standards for residential and commercial buildings. CBC standards are based on building standards that have been adopted by state agencies without change from a national model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature, not covered by the national model code. Typical fire safety requirements of the CBC include: the installation of sprinklers in all high-rise buildings; the establishment of fire resistance standards for fire doors, building materials, and particular types of construction; and, the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CBC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies. Specific CBC regulations have been incorporated by reference in the Los Angeles Building Code Fire Safety Regulations. Chapter 7 of the CBC is incorporated by reference in Chapter 9 (Section 91.700) of the Los Angeles Municipal Code (LAMC) regarding the use of fire-resistant building materials, fire suppression systems, and other fire safety elements related to the design and construction of high-rise buildings. Chapter 9 of the CBC is incorporated by reference in Chapter 9 (Section 91.900) of the LAMC regarding fire protection systems.

Also, the LAFD participates in the California Fire Service and Rescue Emergency Mutual Aid System, as managed by the Governor's Office of Emergency Services (OES). The OES Mutual Aid Plan outlines procedures for establishing mutual aid agreements at the local, operational, regional, and state levels, and divides the state into six mutual aid regions to facilitate the coordination of mutual aid. The LAFD is located in Region I. Through the Emergency Mutual Aid system, the OES is informed of conditions in each

[1] *Water Study / Domestic and Emergency Fire, S.E.C., Civil Engineers, Inc., June 3, 2011.*

geographic and organizational area of the state, and the occurrence or imminent threat of disaster. All OES Mutual Aid participants monitor a dedicated radio frequency for fire events that are beyond the capabilities of the responding fire department and provide aid in accordance with the management direction of the OES.

(2) City of Los Angeles

(a) Los Angeles General Plan Framework

The Infrastructure and Public Services Chapter of the Citywide General Plan Framework sets goals, objectives, and policies for fire protection and emergency medical services in the City of Los Angeles. Objectives and policies have been established in accordance with Goal 9J of the Infrastructure and Public Services Chapter, which is to ensure that every neighborhood has the necessary level of fire protection service, emergency medical service, and infrastructure. Under the General Plan Framework, the City standard for both fire protection and emergency medical service response distance is 1.5 miles.[2]

(b) General Plan Safety Element

The General Plan Safety Element, adopted on November 26, 1996, replaces the 1975 General Plan Safety Element and the 1979 Fire Protection and Prevention Element. It contains policies related to the City's response to hazards and natural disasters. Policy 2.1.6 requires the LAFD to maintain, enforce, and upgrade requirements, procedures, and standards to facilitate effective fire suppression including peak load water flow and building and fire code regulations. In addition, the LAFD is required to revise regulations or procedures to include the establishment of minimum standards for the location and expansion of fire facilities, based on flow, intensity, and type of land use, life hazards, occupancy, and degree of hazards, to provide adequate fire and emergency medical service response.

(c) Los Angeles Municipal Code and Charter

As detailed in Article 7 (Fire Protection and Prevention) of Chapter V (Public safety and Protection) of the LAMC, the LAFD Bureau of Fire Prevention and Public Safety is required to administer and enforce basic building regulations set by the State Fire Marshal. The Fire Code also provides regulations for the safeguarding of life and property from fire, explosion, panic, or other hazardous conditions which may arise in the use or occupancy of buildings, structures, or premises.[3]

Section 520 of the Los Angeles City Charter requires the LAFD to control and extinguish injurious or dangerous fires and remove that which is liable to cause those fires; enforce all ordinances and laws relating to the prevention or spread of fires, fire control, and fire hazards within the City; conduct fire investigations; and protect lives and property in case of disaster or public calamity.

Division 118 of the Fire Code requires that all new high-rise buildings greater than 75 feet in height include a fire control station containing a public address system and telephones for LAFD use. The fire control station must contain a fire detection and fire alarm system, an elevator recall switch and status panel for all elevator cars, a sprinkler control system, standby power and emergency electrical power controls, controls for unlocking stairshaft doors, smoke evacuation and fan controls, stairway pressurization control switches, and

[2] *City of Los Angeles General Plan Framework, page 9-5.*
[3] *City of Los Angeles Municipal Code, Article 7, Chapter V, Section 57.01.02.*

status indicators for fire pumps and water supply. A sound-powered telephone communication system must be located at every floor level in each enclosed exit stairway, at every exterior location where an enclosed stairway exits to a public way, on the roof, and in every elevator car. In addition, a high-rise building must have at least one emergency and fire control elevator in each bank of elevators (Section 57.118.05), a dependable method of sounding a fire alarm throughout the building (Section 57.118.06), an emergency smoke control system (Section 57.118.07), a standby and emergency power system (Section 57.118.08), stairshaft doors for fire department use (Section 57.118.09), pressurized stairshafts (Section 57.118.10), and other devices operable from the fire control station, as previously listed. Division 118 also requires the installation of automatic sprinkler systems in all new high-rise buildings in addition to a rooftop emergency helicopter landing facility on each building in a location approved by the Chief of the LAFD.

Division 119 of the Fire Code requires an annual inspection of high-rise buildings including an evaluation of physical access, property condition, and all fire-safety facilities and equipment required under the LAMC Fire and Building Codes. Automatic fire extinguishing systems are inspected every six months by the LAFD. Annual fire safety inspections include fire warning systems, central station signaling systems, smoke management systems, elevators, emergency generator and lighting systems, fire doors, fire pumps, pressure reducing valves, and fire escapes. Under LAMC Chapter 9, Section 91.909.3, all smoke control systems shall be tested prior to the issuance of a Certificate of Occupancy and, after occupancy of the building, all operating parts of the smoke-control systems shall be retested every six months in accordance with the retest requirements established by the Department of Building and Safety and the LAFD.

The LAFD Bureau of Fire Prevention and Public Safety also administers guidelines for the sequence of operations for life safety systems in high-rise buildings. These guidelines address the management of life safety systems and facilities, including a sequence of procedures involving monitoring and management of audible and visual alarm signals; elevator lobby smoke detectors; duct smoke detectors; elevator shaft smoke/heat detectors; sprinkler valve flow switches; and smoke/fire dampers on each floor. Stairway numbering on each floor, roof access, and fire safety signage on all floors in prescribed locations are also required.

Division 9 of the Fire Code addresses access, hydrants, and fire-flow requirements. Under Division 9 (Section 57.09.03), an approved posted fire lane is to be provided for any portion of an exterior wall more than 150 feet from the edge of a roadway. Division 9 (Section 57.09.06) establishes fire-flow standards. Fire-flow is defined as the quantity of water available or needed for fire protection in a given area and is normally measured in gallons per minute (gpm), as well as duration of flow. Fire-flow adequacy is determined by the type of land use with high-density land uses requiring higher flows from a greater number of hydrants. A minimum residual water pressure of 20 pounds per square inch (psi) is required to remain in the water system in addition to the required gpm water flow. Division 9 (Section 57.09.06) limits the maximum response distance from a high-density residential development to a fire station to 1.5 miles. Where a response distance is greater than that which is allowable, all structures must be constructed with automatic fire sprinkler systems. The Chief of the LAFD may also require the provision of additional fire protection. Fire hydrant spacing and hydrant type is also determined according to land use. For high-density residential and neighborhood commercial, one hydrant per 100,000 square feet of land is required with a 300 to 450 feet distance between hydrants. Furthermore, every first story of a residential unit must be within 300 feet of an approved hydrant. Division 9 (Section 57.09.08) also provides for supplemental fire protection in which equipment and systems not otherwise required in the LAMC may be required by the LAFD. For sites

with secured openings, Division 9 (Section 57.09.09) gives the Chief of the LAFD the authority to order the property owner to install an access box in an approved location that is accessible to the LAFD.

For high-rise buildings, LAMC Section 57.33.19 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan is required to designate at each building a Fire Safety Director, Floor Wardens, Private First Responders, and Essential Building Personnel. Among other tasks, this personnel would be required to call 911 during an emergency incident; report to the building's Emergency Assistance Center; direct evacuation operations; report conditions to the LAFD; conduct monthly inspections; know the location of all exits; direct emergency evacuations and fire drills; and assist the LAFD, emergency responders, and on-site personnel during emergency evacuations. A description of the procedures all occupants should follow in an emergency evacuation or drill is also required in the Emergency Plan. The Emergency Plan also designates appropriate evacuation signs and requires the Fire Safety Director to establish the on-site Emergency Assistance Center. Lastly, LAMC Section 57.33.19 requires that mandatory fire drills be conducted at least once annually. A Fire Safety Officer is required to be present to witness and document the total building evacuation. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

(d) Propositions F and Q

The City of Los Angeles Fire Facilities Bond (Proposition F) was approved by voters in November 2000. This original bond allocated $532.6 million of general obligation bonds to finance the construction and rehabilitation of fire stations and animal shelters. $378.6 million of the bond was allocated to build 19 new or replacement neighborhood fire/paramedic stations, one new satellite station (San Pedro Fire Station No. 36), and to expand and replace the emergency air operations and helicopter maintenance facility at the Van Nuys Airport (Fire Station No. 114), for a total of 20 Proposition F projects.

To date, 20 Proposition F and two additional projects have been proposed for construction by the LAFD. Eighteen of the 22 proposed projects are currently operational; three new facilities under the program (i.e., Stations No. 7, No. 39, and No. 82) remain uncompleted. Site selection for Stations No. 7 and No. 39 are in progress. Station No. 82 is currently under construction and is anticipated to be operational in 2013. Stations No. 7 and No. 39 are anticipated to be operational in 2014. Of the 18 completed projects, Fire Station No. 59, located approximately 2.5 miles southwest of the site, was replaced with a new fire station in August 2006. The current Progress Report (February – March 2011) indicates a program completion date of June 2014.[4]

Measure J, which was approved by voters at the November 7, 2006, County State General Election, is a charter amendment and ordinance that involves technical changes to Proposition F. Currently under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations must be designed and built on a single site of at least two acres. This is to ensure that firefighters in training remain in the service area and are available to respond to emergency calls. Measure J allows new regional fire stations funded by Proposition F located in densely developed areas to be designed and built on one or more properties equaling less than two acres. Components of a regional fire station can

[4] *Los Angeles Fire Department, Los Angeles Prop F Fire Facilities Bond, Progress Report February – March 2011.*

be built on two or more sites within close proximity, or the facility can be designed to fit on a single site of less than two acres.

Proposition Q, the Citywide Public Safety Bond Measure, approved by voters in March 2002, allocates $600 million to renovate, improve, expand and construct police, fire, 911, and paramedic facilities.[5] Proposition Q involves 13 overall projects consisting of the construction and/or replacement of five new police stations, one new police station & jail, two bomb squad facilities, one Metro Detention Center, one new Emergency Operations/Dispatch Center, one Valley Traffic Division and Bureau Headquarters, renovation of existing fire facilities, and renovation of police facilities.[6] Proposition Q does not include any renovations or improvements to LAFD fire stations within the project vicinity.

(e) Modified Coverage Plan & FY2011–2012 Deployment Plan

In response to budget limitations in the City of Los Angeles, the LAFD implemented the Modified Coverage Plan (MCP) on August 9, 2009, to temporarily reduce the LAFD's financial footprint. The MCP was designed to maintain fire and emergency medical service (EMS) response in each of the local fire station service areas, while reducing the overall cost of operation. The MCP reduces LAFD expenditures by periodically closing LAFD resources on a rotating basis. Specifically, each day, 31 engine companies are closed and 122 fire personnel are transferred from the closed engine companies to fill vacancies at other stations due to illness, retirement, and vacation. In addition, on a rotating basis, the following resources are placed "out of service" for any given day: 22 engine trucks, six basic life support (BLS) ambulances, two battalion command teams, and one division command team.

Although the MCP has been successful in reducing expenditures while maintaining service levels, fiscal conditions have not yet improved and the City has required that the LAFD cut its budget by nearly 30 percent over what it was in fiscal year (FY) 2009. The LAFD has responded by approving the FY2011-2012 Deployment Plan. The MCP will be phased out and the FY2011-2012 Deployment Plan will officially take effect on July 5, 2011.

The FY 2011-2012 Deployment Plan outlines measures to further reduce department expenditures, while ensuring that no fire stations are closed, no firefighters lose their jobs, and existing equipment levels are maintained. By implementing a geographic strategy based on an analysis of 2007–2011 emergency response data, the FY2011-2012 Deployment Plan will allow the LAFD to operate more efficiently, while focusing resources on areas with historically higher emergency response demand. In this way, the FY2011-2012 Development Plan would increase the number of EMS battalions, BLS ambulances, "600" series BLS ready reserve ambulances, engine companies, assessment/paramedic engine companies, and truck companies available at any given time when compared to existing conditions. Similar to the MCP, the FY2011-2012 Deployment Plan reduces overall expenditures by reassigning staff throughout the City. However, in comparison to the MCP, the FY2011-2012 Deployment will reassign staff for the entire life of the Plan, rather than rotating staff throughout the City on a daily basis. In a given geographic area, one or more emergency resources (typically an engine company) will be idled and the personnel to staff that resource would be transferred to an "active" resource at a nearby station. The FY2011-2012 Deployment Plan is intended to

[5] *City of Los Angeles, Bureau of Engineering, 2002 Proposition Q Citywide Public Safety Bond Program, 2002 Proposition Q Monthly Progress Report – February/March 2011, available at: http://www.lapropq.org/modules/fileUpload/files/Prop_Q_Monthly_Report_FebMar11.pdf; accessed April 6, 2011.*

[6] *Ibid*.

guide LAFD operation during the 2011-2012 fiscal year; LAFD operations would be reviewed prior to each fiscal year to determine the appropriate level of staffing at LAFD stations.

As discussed in the Existing Conditions section immediately below, the FY2011-2012 Deployment Plan would change the conditions at Fire Station No. 92, which is the "first-in" fire station for the project site.

b. Existing Conditions

(1) Fire Protection Facilities, Services, and Response Times

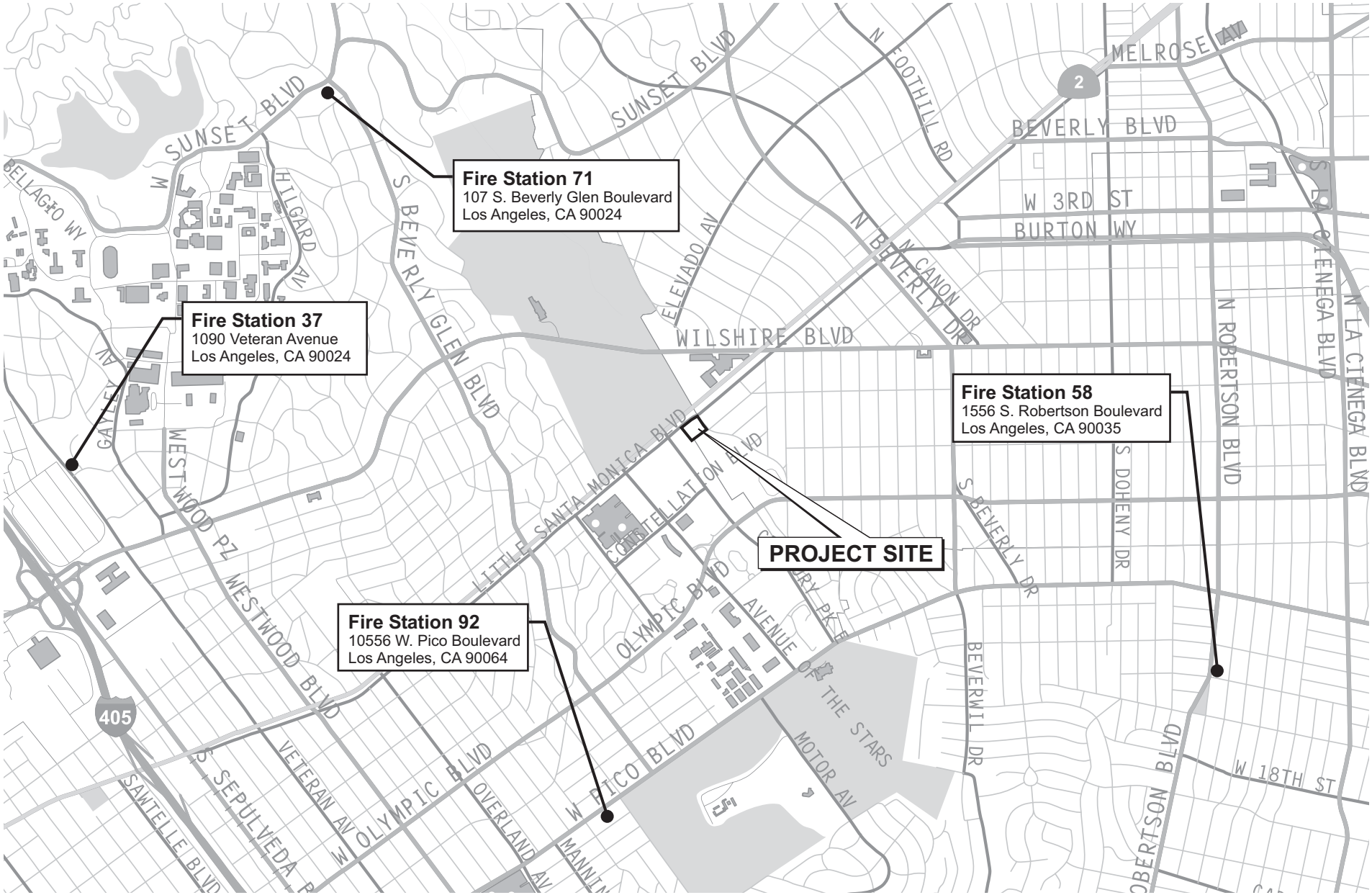
In accordance with the Los Angeles Charter Section 520, fire prevention, fire suppression, and life safety services within the City of Los Angeles are provided by the LAFD. The LAFD is a full-spectrum life safety agency that provides fire protection and emergency medical services to a population of approximately 4 million people throughout the City of Los Angeles. The LAFD's 3,586 uniformed personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. At any given time, there are a total of 1,104 uniformed firefighters, including 242 paramedics, on-duty at 106 fire stations across the LAFD's 471 square mile jurisdiction. These figures represent the number of uniformed firefighters that are available to respond to emergency calls and do not include other on-duty uniformed firefighters that are involved in training or various administrative and support functions.[7]

As shown in **Figure IV.J.1-1**, *Fire Stations Located in the Vicinity of the Project Site*, there are three LAFD fire stations located in the vicinity of the project site. The location, distance from the project site, response time to the site, staffing, and equipment of each of these fire stations are summarized in **Table IV.J.1-1**, *Fire Stations Located in the Vicinity of the Project Site*. As shown in Table IV.J.1-1, Fire Station No. 92 at 10556 West Pico Boulevard in Century City is located closest to the project site. At a distance of approximately 1.6 miles, and with an average response time of 6.2 minutes for structure fires and 5.5 minutes for high-risk medical emergencies, Fire Station No. 92 would likely be the first to respond to the project site in the event of an emergency and would thus be designated the "first-in" station. The "first-in" districts are determined by the response time and distance between the site and the City's fire station. "First-in" district boundaries are generally located at halfway points between two stations.[8] "First-in" districts are also based on the land uses contained within the district, since the demand for services and response times can vary depending on population density, traffic, building types, and uses. The "first-in" district served by Fire Station No. 92 includes the communities of Century City, Rancho Park, and Cheviot Hills and is generally bounded by Santa Monica Boulevard and a portion of the Los Angeles Country Club Golf Course on the north, the City of Beverly Hills boundary on the east, National Boulevard on the south, and the San Diego Freeway on the west.

As mentioned above, the FY2011-2012 Deployment Plan would affect operations at Fire Station No. 92. Fire Station No. 92 currently contains one truck company, one engine company, and one advanced life support (ALS) ambulance. Depending on the situation, the truck company and engine company can respond together in a unit known as a "light force" unit. Under the current MCP, Fire Station No.92 is fully staffed for 12 of

[7] *Los Angeles Fire Department, Department Overview. Available at: http://lafd.org/administration/97-lafd-administration/320-department-overview, Accessed April 6, 2011.*

[8] *The midway points are determined according to response times to specific "Z" points (points placed 500 feet apart on a grid).*



PCR

N

0 0.5 Miles

Fire Stations Located in the Vicinity of the Project Site

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.J.1-1

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Table IV.J.1-1

Fire Stations Located in the Vicinity of the Project Site

Station No./Location	Distance From Project Site	Approximate Response Time To Project Site (Structure Fire / High Risk Medical Emergency)	Staffing under the MCP	Staffing Under the FY2011-2012 Deployment Plan	Equipment
Fire Station No. 92 10556 W. Pico Blvd. Century City	1.6 miles	6.2 minutes 5.5 minutes	12[a]	8[a]	1 Truck Company (ALS)[b] 1 Engine Company (BLS)[a,b] 1 Ambulance Unit (ALS)
Fire Station No. 37 1090 Veteran Avenue Westwood	2.4 miles	5.7 minutes 5.2 minutes	12	12	1 Truck Company (BLS)[b] 1 Engine company (BLS)[b] 1 Ambulance Unit (ALS)
Fire Station No. 71 107 S. Beverly Glen Blvd. Holmby Hills	2.6 miles	7.5 minutes 6.8 minutes	6	6	1 Engine Company (ALS) 1 Ambulance Unit (ALS)

[a] *Under the FY2011-2012 Deployment Plan, effective July 5, 2011, the four staff members assigned to engine company at Fire Station No. 92 would be reassigned to nearby fire stations, and full-time staffing would be reduced to eight personnel.*

[b] *If required, the truck company and engine company can respond together as a "light force unit". A truck company consists of an aerial ladder truck staffed by six employees (i.e., a Captain II, an Apparatus Operator, an Engineer, and three Firefighters). An engine company consists of a fire engine staffed by four employees (i.e., a Captain I, an Engineer, and two Firefighters). An advanced life support (ALS) ambulance unit consists of an ambulance staffed by two Firefighters/Paramedics.*

Source: Captain Ernest Bobadilla, Los Angeles Fire Department, Planning Section, Letter Correspondence dated May 24, 2011.

every 27 days; the engine company is closed nine of every 27 days; and the light force unit is closed six of every 27 days. In comparison, under the FY2011-2012 Deployment Plan, the personnel that currently staff the engine company on a daily rotating basis would be reassigned to nearby fire stations for the entire life of the Deployment Plan. Both the truck company and ALS ambulance unit would continue to be fully staffed.

Under the Deployment Plan, if an incident requires the response of an engine company, it would deploy from a nearby station, likely from Fire Station Nos. 37 or 71, which would both retain full staffing. The physical apparatus (i.e., fire engine and associated equipment) would continue to be housed at Fire Station No. 92 and could be readily staffed to provide surge capacity. As mentioned above, Fire Station No. 92 can currently respond with a light force unit. However, under the FY 2011-2012Deployment Plan, if an incident were to require a light force unit, the engine company portion of that unit would deploy from a nearby station. Although the LAFD would determine the appropriate level of staffing at the beginning of each fiscal year and may increase staffing at Fire Station No. 92 in the future, for the purposes of this analysis, it is assumed the Deployment Plan would still be in effect at the time of Project buildout in 2016.

"Second call" stations are fire stations located in adjacent districts that support the "first-in" station. The LAFD has indicated that during a fire-related incident, 1st alarm assignment would include: the light force unit, engine company, and ambulance unit from Fire Station No. 92; Battalion Command Team 9; the light force unit and engine company from Fire Station No. 37; the engine company and ambulance unit from Fire

Station No. 71, the engine company from Fire Station No. 59; Battalion Command Team 18; and Paramedic Captain 18. As indicated in this response and shown in Table IV.J.2-1, above, Fire Station Nos. 37 and 71 would be designated as "second call" stations to support Fire Station No. 92 in the event of an emergency at the project site. Fire Station Nos. 37 and 71 are located approximately 2.4 miles and 2.6 miles from the project site, respectively. Fire Station No. 37 has an average response time of 5.7 minutes for structure fires and 5.2 minutes for high-risk emergency medical incidents, whereas Fire Station No. 71 has an average response time of 7.5 minutes for structure fires and 6.8 minutes for high-risk emergency medical incidents. In the event that additional response teams are needed during a major emergency, third response fire protection and emergency medical services would be provided by other fire stations within the LAFD system in the surrounding West Los Angeles and Century City area, including Fire Station No. 58 located at 1556 South Robertson Boulevard approximately 3.5 miles from the project site. The LAFD also maintains a mutual aid agreement for shared services with the Beverly Hills Fire Department (BHFD); however, the LAFD has indicated that the BHFD mutual aid agreement does not include BHFD resources within the area of the project site. As a result, the BHFD would not be expected to respond to an emergency event at the project site.

Table IV.J.1-2, *Fire and Paramedic Incident Data,* provides a listing of the daily and yearly average emergency medical service and fire incidents for each of the three fire stations located near the project site. Fire incidents refer to fire calls, including building fires; smoke; traffic accidents not requiring emergency medical service; trash and vehicle fires; and responses to fire alarms, elevator rescues, and similar emergencies. As indicated in Table IV.J.1-2, the average number of total daily incidents (emergency medical service and fire incidents) for the Fire Station Nos. 92, 37, and 71 are 18.6, 33.2, and 9.2 incidents, respectively. Table IV.J.1-2 also lists the average response times to these incidents for each fire station. As shown, average response times range from 5.2 to 6.8 minutes for emergency medical service and range from 5.7 to 7.5 minutes for fire incidents.

(2) Emergency Access

The project site is accessible by emergency vehicles from a number of major roadways serving the project site. Fire Station Nos. 92 and 37 would access the project site via Century Park East and Santa Monica Boulevard. Fire Station No. 71 would access the project site via Beverly Glen Boulevard and Santa Monica Boulevard.

(3) Fire-Flow

Water for fire-fighting purposes is supplied to the project site via existing LADWP water mains. Currently, the project site is served by two, twelve-inch lines approximately 25 feet north of the site under Santa Monica Boulevard, with a water capacity of 6,000 gpm at 30 psi residual flowing at four nearby fire hydrants simultaneously. There is one existing fire hydrant on Santa Monica Boulevard fronting the project site, which is approximately 100 feet east of the west properly line of the project. There are also additional fire hydrants in the project vicinity along Santa Monica Boulevard and Century Park East that could serve the project site.

A 60-inch water main exists on Century Park East that is proposed to be connected to the Century City water system via a regulation station in the vicinity of Century Park East and Galaxy Way. Once the regulation system is operational it is estimated that amount of water available to the site will be approximately double

Table IV.J.1-2

Fire and Paramedic Incident Data

Fire Station	Number of Emergency Incidents		
	Daily Average	Yearly Average [a]	Average Response Time
Fire Station No. 92			
Medical Incidents	14.0	5,110	5.5
Fire Incidents	4.6	1,679	6.2
Total Station Incidents	**18.6**	**6,789**	
Fire Station No. 37			
Medical Incidents	24.8	9,052	5.2
Fire Incidents	8.4	3,066	5.7
Total Station Incidents	**33.2**	**12,118**	
Fire Station No. 71			
Medical Incidents	5.4	1,971	6.8
Fire Incidents	3.6	1,314	7.5
Total Station Incidents	**9.0**	**3,285**	

[a] *Yearly average obtained by multiplying the daily average by 365 days.*

Source: Captain Ernest Bobadilla, Los Angeles Fire Department, Planning Section, Letter Correspondence dated May 24, 2011.

what it is today. This connection is in the LADWP's budget and funded for construction to start around early 2012 and is scheduled to be completed around June 2012.

3. PROJECT IMPACTS

a. Methodology

Fire service needs relate to the size of the population and geographic area served, the number and types of calls for service, and the characteristics of the community and the proposed project.[9] Changes in these factors resulting from the proposed project may increase the demand for services. The LAFD evaluates the demand for fire prevention and protection services on a project-by-project basis to review a project's emergency features and to determine if a proposed project would require additional equipment, personnel, new facilities, or alterations to existing facilities. Beyond the standards included in the Los Angeles Fire Code, consideration is given to the size of a project, uses proposed, fire-flow necessary to accommodate the project, response time (an acceptable response time is generally 5 minutes, although all fire stations serving the site currently have a response time greater than five minutes), and distance for engine and truck companies, fire hydrant sizing and placement standards, access, and the project's potential to use or store

[9] *City of L.A. CEQA Thresholds Guide (2006).*

hazardous materials. Based on these factors, a determination is made as to whether the LAFD would require a new or physically altered facility to maintain current service levels, the construction of which could result in a potentially significant environmental impact.

As mentioned above, the LAFD will implement the FY2011-2012 Deployment Plan on July 5, 2011. While the LAFD would evaluate the appropriate level of staffing at the beginning of each fiscal year, for the purposes of this analysis, it is assumed that the staffing levels prescribed in the FY2011-2012 Deployment Plan would still be in place in 2106, the year of project buildout.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a screening question that addresses impacts with regard to fire protection service. This question is as follows:

> *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- Fire Protection?

In the context of this question from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide* states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The proposed land use;
- Fire-related needs (e.g., use of hazardous materials);
- Whether the project site meets the recommended response time and distance requirements; and
- Project design features which would reduce or increase the demand for fire protection services.

Based on these factors, the *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact to fire protection services if:

> **FIRE-1** The Project would require the addition of a new fire station; or the expansion, consolidation, or relocation of an existing facility to maintain service.

c. Project Design Features

The proposed project would comply with applicable State and local codes and ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the City of Los Angeles General Plan. The proposed project would also comply with the City of Los Angeles Department of Public Works Standard Plan S-470-0 regarding the standard street dimensions related to private development, and applicable high-rise construction requirements set forth in the LAMC, including Chapter 9 (Building Code) and Chapter 5, Article 7 (Fire Code). In regard to Division 7 of the Building Code, the

proposed project would comply with all fire safety requirements related to provision of fire-resistant building materials and smoke control.

The proposed project would provide emergency vehicle access to the project site subject to the approval of the LAFD. The Applicant has been coordinating with LAFD during the development of the project design plans to ensure that emergency vehicles and equipment would have access to the project. In response to this coordination, a fire lane designed in accordance with LAFD requirements would be provided within the project site with access from Santa Monica Boulevard. Additional site access would be provided via Moreno Drive. A fire truck lane would be established at the eastern side of the project site, just outside the edge of the proposed cantilevered overhang. This fire lane will be dedicated for fire truck parking only.

Consistent with the requirements of the Fire Code, including Division 118, the project would provide one emergency and fire control elevator in each bank of elevators, an emergency smoke control system, a standby and emergency power system, and a dependable alarm system. The building design would include stairshaft doors for fire department use and pressurized stairshafts. As the project is located in excess of 1.5 miles from the nearest LAFD fire station (at 1.6 miles), in accordance with LAMC Sections 57.09.06 and 57.118.11, the proposed project would be constructed with an automatic fire sprinkler system throughout the residential building and ancillary building. To comply with Fire Code requirements, smoke detectors would also be maintained in all residential units and public areas. Additionally, in compliance with Fire Code Division 33 (Section 57.33.17) stairways would be numbered on each floor, and fire safety signage on all floors would be placed in required locations. In case of fire emergencies, access to the roof would also be available. During construction, the Applicant would notify the LAFD of the times of day and locations of all temporary lane closures, and such closures would be coordinated so that they do not occur during peak traffic periods, to the extent feasible. Moreover, the proposed project would install a new on-site fire hydrant at the southwest corner of Santa Monica Boulevard and Moreno Drive in order to achieve a fire-flow of 6,000 gpm from four fire hydrants.

Lastly, the proposed project would implement an Emergency Plan in accordance with LAMC Section 57.33.19. The Emergency Plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and would also establish a drill procedure to prepare for emergency incidents. It would also establish an on-site Emergency Assistance Center and outline the procedures that all occupants should follow during an emergency incident. To ensure that building occupants are aware of all exits and identified procedures, a drill would be conducted by the assigned building personnel at least once annually. This drill would be monitored and documented by a LAFD Fire Safety Officer. The Emergency Plan would be resubmitted to the LAFD annually, and revised when necessary.

d. Analysis of Project Impacts

Demand for fire protection services from project activities would be similar for development with the Conventional Parking Option and with the Automated Parking Option. The construction programs of both would be the same except for lesser construction for a small ancillary building with the Automated Parking Option. At the same time, the project design features for providing fire protection and emergency access during project construction would be the same. Likewise, project operations under both parking options, would include the same number of site residents and visitors carrying out similar residential activities. Also, development under both parking options would include the same fire protection and emergency access

features. As such, the following analysis addresses the impacts of both the Conventional Parking Option and the Automated Parking Option.

(1) Construction

Construction activities may temporarily increase the existing demand on fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response. Fire suppression equipment specific to construction would be maintained on-site. Additionally, project construction would comply with applicable existing codes and ordinances. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

The project proposes to do all staging within the project site, limiting potential conflicts with traffic on local streets. Notwithstanding, construction-related traffic on adjacent streets could potentially affect emergency access to the project site and neighboring uses. Construction activities may involve temporary lane closures for utility construction. Also construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction. As such, construction activities could increase response time for emergency vehicles to local businesses and/or residences on Santa Monica Boulevard and Moreno Drive, due to travel time delays to through traffic.

However, the impacts of such construction activity would be of short duration, and on an intermittent basis. Further, as described in Section IV.K, Transportation and Circulation, of this Draft EIR, mitigation measures would be implemented for the project that would reduce the potential for construction activities to impact emergency response times and emergency access in the area (e.g., City of Los Angeles and the City of Beverly Hills). Project construction would be controlled by a Construction Management Plan subject to review and approval by the Los Angeles Department of Transportation (LADOT) that would include, among other features, the following provisions: deliveries and pick-ups of construction materials would be scheduled during non-peak travel periods and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time; access would remain unobstructed for land uses in proximity of the project site during project construction; temporary lane closures, when needed, would maintain traffic in both directions and would be scheduled to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. In addition, the project's truck traffic during construction would enter the project property by way of Santa Monica Boulevard and exit onto Moreno Drive with a left turn north to Santa Monica Boulevard and then a left turn to west on Santa Monica Boulevard to nearby regional freeways. This flow of truck traffic would avoid truck operations on neighborhood streets within Beverly Hills. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, impacts regarding emergency access, and related safety would be less than significant.

(2) Operation

(a) Fire Protection Facilities, Services, and Response Times

As previously discussed, Fire Station No. 92 is located closest to the project site and would be the "first-in" station to respond to an emergency. As shown in Table IV.J.1-2, Fire Station No. 92 averages approximately 6,789 incidents per year. The population currently served by Fire Station No. 92 is estimated to be 35,664 persons.[10] By dividing the number of annual incidents by the population of the "first-in" district served by Fire Station No. 92, a generation factor of 0.190 annual incidents per capita was derived.[11] The proposed project would generate approximately 379 new residents.[12] Based on the generation factor of 0.190 incidents per capita, the project's net new residents could potentially generate 72 additional incidents per year. The addition of 72 more incidents per year would constitute a 1.1 percent increase in annual incidents. A 1.1 percent increase in annual incidents is relatively low, and would only slightly increase the demand on LAFD fire protection and emergency medical services. Furthermore, this is a conservative estimate as it does not account for the benefits of new construction and the various fire prevention features built into the proposed project.

Personnel reassignment under the FY2011-2012 Deployment Plan has the potential to effect LAFD service levels, regardless of the proposed project. However, by increasing the efficiency at which the LAFD operates, the FY2011-2012 Deployment Plan has been designed using historic incident data to reduce fiscal expenditures while maintaining existing service levels. Thus, service levels within the Fire Station No. 92 service area are expected to remain the same as under existing conditions with implementation of the Deployment Plan. It is important to note that under existing conditions, the engine companies at Fire Station No. 92 and nearby stations are closed on a rotating basis pursuant to the MCP. Under the FY2011-2012 Deployment Plan, staff rotations would no longer occur and nearby stations would remain fully staffed at all times. As a result, an engine company would always be available to respond to an incident at the project site. Further, since all equipment would remain at Fire Station No. 92, the engine company could readily be manned to provide surge capacity if needed.

The fundamental strategy of the FY2011-2012 Deployment Plan is to reassign existing personnel to locations where they can best serve the community while maintaining existing service, equipment, and station levels. By its very nature, the FY2011-2012 Deployment Plan creates excess capacity throughout the LAFD that could accommodate additional personnel, should the Deployment Plan expire or additional personnel be required. In the case of Fire Station No. 92, additional personnel could be accommodated by the additional capacity and equipment at the station without requiring a new station or requiring physical alterations to the existing station.

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[10] *The "first-in" district served by Fire Station No. 92 is generally bounded by Santa Monica Boulevard and a portion of the Los Angeles Country Club Golf Course on the north, the City of Beverly Hills boundary on the east, National Boulevard on the south, and the San Diego Freeway on the west. This service area corresponds to the West Los Angeles Community Plan Area east of the Santa Monica Freeway with the exclusion of Census Tracts 269100 and 269500. Census population data for census tracts in this area are as follows: Census Tract 2671 (6,087 residents), Census Tract 2672 (5,927 residents), Census Tract 2678 (2,917 residents), Census Tract 2679.01 (2,428 residents), Census Tract 2679.02 (3,375 residents), Census Tract 2690 (5,138 residents), Census Tract 2693 (3,885 residents), Census Tract 2698 (3,458 residents), Census Tract 2711 (2,449 residents).*

[11] *This methodology assumes that incidents are a function of people (i.e., the more people you have in an area, the more chances that an incident (fire or medical emergency) will occur.*

[12] *Century City makes up the entirety Census Tract 2679.01. According to the 2010 Census data, there were 2,428 residents and 1,812 housing units in Century City, for an average 1.34 persons per household.*

As mentioned above, the incremental increase in demand resulting from the proposed project would not be substantial enough to require additional personnel at Fire Station No. 92 or other nearby stations. Therefore, based on the number of incidents estimated for the proposed project together with the ability of other fire stations to provide support to Fire Station No. 92 and nearby stations, construction of an additional station or physical alterations to existing facilities would not be required. Nonetheless, Mitigation Measures J-1 and J-2 are recommended to help reduce the number of incidents and ensure impacts to fire protection and emergency medical services are less than significant.

The adequacy of fire protection and emergency medical service for a given area is based on response distance from existing fire stations, required fire-flow, and the LAFD's judgment for needs in the area. Fire Station No. 92 is located 1.6 miles from the project site and is just outside the recommended maximum response distance of 1.5 miles. The estimated response time to the project site is 6.2 minutes for structure fires and 5.5 minutes for high-risk medical emergencies, which is just beyond the recommended response time of 5 minutes. Under the FY2011-2012, if an engine company is required, it would deploy from either Fire Station No. 37 or Fire Station No. 71, which could result in an increase in response time for the engine company. However, this increase is anticipated to be negligible since Fire Station No. 37 has faster response times than Fire Station No. 92 and because current response times are based on operations under the MCP, which currently closes engine companies in the area on a rotating basis. In addition, as the project is located in excess of 1.5 miles from the nearest LAFD fire station, the project would be constructed with the additional project design features discussed above (e.g., an automatic fire sprinkler system throughout the residential building and ancillary building in accordance with LAMC Sections 57.09.06 and 57.118.11) to reduce the potential for on-site fire incidents. Thus, although the project site is not within the recommended maximum response distance implemented by the LAFD, project design features and support from nearby LAFD stations would ensure that response times are not significantly increased under the proposed project. Therefore, based on the low number of incidents estimated for the proposed project, the fire prevention features incorporated into the project, and the ability of Fire Station No. 92 to operate in concert with other nearby fire stations, construction of an additional station or physical alterations to existing fire stations would not be required. With respect to the BHFD, as mentioned above, the LAFD has indicated that its mutual aid agreement with the BHFD does not include the provision of BHFD services into the project area.[13] Therefore, the proposed project would not result in an increase in demand for BHFD services. Therefore, project impacts with respect to fire protection facilities would be less than significant.

(b) Emergency Access

Project-related increase in traffic on surrounding roadways could have an impact on fire protection and emergency medical services if the response capabilities of the LAFD are impeded. As discussed in Section IV.K Transportation and Circulation, of this Draft EIR, the proposed project would not result in significant impacts to any of the study intersections or neighborhood street segments. Furthermore, due to the proximity of Fire Station No. 92 (1.6 miles) and the two supporting fire stations to the site, as well as the number of major roadways serving the project site, emergency response to the project site is anticipated to be similar to the existing service level of 6.2 minutes for structure fires and 5.5 minutes for high-risk medical emergencies by Fire Station No. 92. As described above, the Applicant has been coordinating with LAFD during the development of the project design plans in order to ensure that emergency vehicles and equipment have adequate access to the project. In response to this coordination, a fire lane designed in

[13] *E-mail note from James Patrick Hayden, Los Angeles Fire Department to PCR Services, June 10, 2011.*

accordance with LAFD requirements would be provided within the project site with access from Santa Monica Boulevard. Additional site access would be provided via Moreno Drive. A fire truck lane would be established at the eastern side of the project site, just outside the edge of the proposed cantilevered overhang. This fire lane will be dedicated for fire truck parking only. As a result, project impacts with respect to emergency access would be less than significant. Nonetheless, although coordination has been taking place during Project design, Mitigation Measure J-3, which requires the Applicant to submit a plot plan and floor plans to the LAFD prior to the issuance of building permits, is also recommended to ensure impacts to emergency access are less than significant.

(c) Fire-Flow

Fire-flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. The existing fire-flow to the project site is approximately 6,000 gpm at 30 psi residual from four nearby fire hydrant flowing simultaneously. The LAFD Hydrant and Access Unit have indicated that a fire-flow of 6,000 gpm to the project site from four fire hydrants will be required to adequately serve the site.[14] In order to achieve this fire-flow, the LAFD has also indicated that one additional fire hydrant would be required at the corner of Santa Monica Boulevard and Moreno Drive. Mitigation Measure J-4 is included below to assure provision of the additional fire hydrant. This mitigation measure requires that the proposed project install an additional fire hydrant at the southwest corner of Santa Monica Boulevard and Moreno Drive in accordance with the project's proposed design features. With this additional fire hydrant, the LADWP has indicated that a fire flow of 6,000 gpm from four fire hydrants with a residual pressure of 30 psi could be achieved.[15] Further, as discussed above, a proposed regulator station in the vicinity of Century Park East and Galaxy Way that is slated for completion around June 2012 would enhance water availability for fire-fighting in the project area. With the addition of the one fire hydrant required under Mitigation Measure J-4, the project site would be able to exceed the required fire-flow of 6,000 gpm from four hydrants with a residual pressure of 25 psi and potential impacts would be reduced to a less than significant level. Thus, with implementation of Mitigation Measure J-4 below, potential impacts related to fire-flow would be reduced to a less than significant level.

4. CUMULATIVE IMPACTS

Section III of this Draft EIR identifies 40 related projects that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative analysis on fire protection and emergency medical services, only those related projects located within Fire Station No. 92's "first-in" district are considered. Of the 40 related projects identified in Section III, 11 are located within Fire Station No. 92's "first-in" district as listed in **Table IV.J**.1-3, *Related Projects Within Fire Station No. 92 Service Area*. These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional fire protection and emergency medical services. The related projects include various residential, commercial/retail, museum, and office uses. Similar to the proposed project, the number of annual incidents anticipated to be generated by related projects was estimated based on residential and non-residential increases in population. As shown in Table IV.J.1-3, the related projects located within Fire Station No. 92 "first-in" district could potentially increase residential and non-residential population by 8,807 persons thus generating an additional 1,673 incidents

[14] *LAFD, Written correspondence from Captain Terrance O'Connell dated April 19, 2011.*

[15] *LADWP, written correspondence from Mike Downs, Western District Engineer, dated June 1, 2011.*

Table IV.J.1-3

Related Projects Within Fire Station No. 92 Service Area

Map No.[a]	Project	Location	Residential[b] and Non-Residential[c] Population	Approximate No. of Annual Incidents[d]
4	Mixed-Use Development	10857 Santa Monica Blvd	145	28
5	Office Building	2142 Pontius Ave	70	13
6	Mixed-Use Development	9001 Pico Blvd	90	17
9	Condominium	10777 Wilshire Blvd	121	23
11	Mixed-Use Development[e]	9760 Pico Blvd	0	0
13	Museum of Tolerance Expansion[e]	9786 Pico Blvd	0	0
14	Century City Westfield Expansion	10250 Santa Monica Blvd	1,787	340
15	Mixed-Use Development	11122 Pico Blvd	1,885	358
16	Mixed-Use Development	2025 Avenue of the Stars	1,487	283
17	Condominium	10331 Bellwood Ave	319	61
18	Office	1950 Avenue of the Stars	2,903	552
		Related Projects Total	**8,807**	**1,673**
		Proposed Project Total	**379**	**72**
		Grand Total	**9,186**	**1,745**

[a] *Corresponds with Map Nos. on Figure III-1 in Section III of this Draft EIR.*

[b] *For related projects with residential uses, the residential population was determined by multiplying the number of residential units by the average household size in the West Los Angeles community plan area.*

[c] *For related projects with non-residential uses, the non-residential population was determined based on the following generation factors as indicated in the City of L.A. CEQA Thresholds Guide (2006): 4 persons per 1,000 square feet of office space, 3 persons per 1,000 square feet of retail space, and 1.5 persons per hotel room.*

[d] *The residential and non-residential population was multiplied by the generation factor of 0.190 incidents per capita to estimate the number of incidents generated by related projects.*

[e] *These projects do not contain any uses that would directly or indirectly generate any residents.*

[f] *For residential project in Century City, the residential population was determined by multiplying the number of residential units by the average household size in Century City.*

Source: PCR Service Corporation, 2011.

per year. The proposed project in conjunction with the related projects could generate a total of 1,745 incidents per year, which would result in a 25.7 percent increase in annual incidents.

Although a cumulative increase in LAFD fire protection services would occur, cumulative project impacts on fire protection and emergency medical services would be reduced through regulatory compliance, similar to the proposed project. All related projects would comply with the LAMC Fire Code and Building Code regulations related to fire safety, access, and fire-flow. Additionally, "second call" stations would help support Fire Station No. 92 in the event of an emergency at these sites. It should also be noted that the project, as well as related projects would generate revenue to the City's general fund in the form of net new property tax, direct (i.e., from on-site commercial uses) and indirect (i.e., from household spending) sales tax, utility user's tax, gross receipts tax, real estate transfer tax on residential initial sales and annual resales, and other miscellaneous household-related taxes (e.g., parking fines). This revenue could be used to fund LAFD

expenditures as necessary to offset cumulative impacts to LAFD fire protection facilities and services. Therefore, cumulative impacts on fire protection and emergency medical services would be less than significant.

5. MITIGATION MEASURES

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

Mitigation Measure J.1-1: Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features and other life-saving equipment (e.g., defibrillators) appropriate to the design of the project.

Mitigation Measure J.1-2: The project shall comply with all applicable State and local codes and ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the City of Los Angeles General Plan, unless otherwise approved.

Mitigation Measure J.1-3: Prior to the issuance of building permits, project building plans including a plot plan and floor plan of the buildings shall be submitted for approval by the Los Angeles Fire Department. The plot plan shall include the following minimum design features: location and grade of access roads and fire lanes, roadway widths, distance of buildings from an edge of a roadway of an improved street, access road, or designated fire lane, turning areas, and fire hydrants.

Mitigation Measure J.1-4: Prior to the occupancy of the proposed project, the Applicant shall install one on-site fire hydrant. The fire hydrant shall be subject to the approval of the Los Angeles Fire Department and Los Angeles Department of Water and Power.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the recommended mitigation measures and compliance with the LAMC Fire Code, the Los Angeles General Plan, the General Plan Safety Element, and all other applicable ordinances and requirements would ensure that the project's impacts on fire protection and emergency medical services are less than significant. Thus, no significant unavoidable impacts are anticipated.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
2. POLICE PROTECTION

1. INTRODUCTION

This section addresses potential impacts on police services that could occur due to construction activities and the increased residential population associated with the proposed project. This analysis focuses on the City of Los Angeles Police Department (LAPD) facilities that currently serve the project site and the ability of the LAPD to provide police protection services to the proposed project. The analysis is based, in part, on information provided by the LAPD Community Relations Section, Crime Prevention Unit regarding police protection facilities, services, and response times. Although the project is located in the City of Los Angeles and falls within the jurisdiction of the LAPD, potential effects on the Beverly Hills Police Department are also discussed.

2. ENVIRONMENTAL SETTING

a. Regulatory Environment

(1) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework, originally adopted in December 1996 and re-adopted in August 2001, sets forth general guidance regarding land use issues for the entire City of Los Angeles and defines Citywide policies regarding land use, including infrastructure and public services. Goal 9I of the Infrastructure and Public Services Chapter of the Citywide General Plan Framework is that every neighborhood have the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.[1] Objective 9.13 and Policy 9.13.1 requires the monitoring and reporting of police statistics and population projections for the purpose of evaluating existing and future needs. Objective 9.14 requires that adequate police services, facilities, equipment, and personnel are available to meet existing and future public needs. Additionally, Objective 9.15 requires police services to provide adequate public safety in emergency situations by maintaining mutual assistance relationships with local law enforcement agencies, State law enforcement agencies, and the National Guard.

The LAPD Computer Statistics Unit (COMPSTAT) implements the General Plan Framework goal of assembling statistical population and crime data to determine necessary crime prevention actions. COMPSTAT was created in 1994 by then Police Commissioner of the New York Police Department and previous Chief of the LAPD, William J. Bratton. This system implements a multilayer approach to police protection services through statistical and geographical information system (GIS) analysis of growing trends in crime through its specialized crime control model. As such, COMPSTAT has effectively and significantly reduced the occurrence of crime in Los Angeles communities through accurate and timely intelligence regarding emerging crime trends or patterns.[2]

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[1] *City of Los Angeles General Plan Framework, page 9-5.*

[2] *LAPD. "COMPSTAT." http://www.lapdonline.org/inside_the_lapd/content_basic_view/6364, accessed April 1, 2011.*

(2) City of Los Angeles Charter and Administrative and Municipal Codes

The law enforcement regulations and the powers and duties of the LAPD are outlined in the City of Los Angeles Charter Article V, Section 570; the City of Los Angeles Administrative Code Chapter 11, Section 22.240; and the Los Angeles Municipal Code (LAMC) Chapter 5 (Public Safety and Protection), Article 2 (Police and Special Officers).

City of Los Angeles Charter Article V, Section 570 gives power and duty to the LAPD to enforce the penal provisions of the Charter, City ordinances, and State and federal law. The Charter also gives responsibility to the LAPD to act as peace officers and to protect lives and property in case of disaster or public calamity. Section 22.240 of the Los Angeles Administrative Code requires the LAPD to adhere to the State of California standards described in Section 13522 of the California Penal Code, which charges the LAPD with the responsibility of enforcing all LAMC Chapter 5 regulations related to fire arms, illegal hazardous waste disposal, and nuisances, such as excessive noise, and providing support to the Department of Building and Safety Code Enforcement inspectors and the Fire Department in the enforcement of the City's Fire, Building, and Health Codes. The LAPD is given the power and the duty to protect residents and property, and to review and enforce specific security related mitigation measures in regards to new development.

(3) West Los Angeles Community Plan

The West Los Angeles Community Plan contains appropriate polices and implementation measures to ensure adequate police protection in the community plan area. The community plan recognizes a continuing need for the modernizing of public facilities to improve services and accommodate changes in the community. Goal 8 sets out to have a community with adequate police facilities and services to protect its residents from criminal activity, reduce the incidents of crime and provide other necessary law enforcements services. Policy 8-1.1 encourages consultation with the LAPD in the review of development projects and land use changes to determine law enforcement needs and requirements. Policy 8-2.2 seeks to ensure adequate lighting around residential, commercial, and industrial buildings to improve security. Lastly, Policy 8-2.3 seeks to ensure that landscaping around buildings does not impede visibility.

(4) Design Out Crime/Crime Prevention through Environmental Design (CPTED)

The City of Los Angeles has established a new initiative called "Design Out Crime," to encourage design of development projects that incorporate techniques of Crime Prevention Through Environmental Design (CPTED). It is intended to look beyond traditional policing methods to address public safety, thus reducing the amount of police officers that would otherwise be required. CPTED provides a series of strategies and design recommendations that can be used by project planners/architects in the design of their projects. Recommended design practices use location of activities within the project site, as well as other site features including, for example, the use of paths, lighting, entryways, and security features (locks/gates/signs) to enhance site safety. These features create safety by providing visual connection/natural surveillance and discouraging criminal activity.

b. Existing Conditions

The Los Angeles Police Department (LAPD) includes 21 community police areas operated among four geographically defined bureaus: the Central, South, West, and Valley Bureaus. The LAPD also has a variety of

support systems including the Direct Support Division, Special Operations, Municipal Division, SWAT, K-9, and the Mounted Unit.

The project site is located in the West Bureau of the LAPD, which covers approximately 124 square miles encompassing the neighborhoods of Pacific Palisades, Westwood, Century City, Venice, Hancock Park, and the Miracle Mile. The West Bureau oversees operations at four community police stations including the Hollywood Community Police Station, the Wilshire Community Police Station, the Pacific Community Police Station, and the West Los Angeles Community Police Station. The West Bureau also oversees operations at the West Traffic Division, which is responsible for investigating traffic collisions and traffic-related crimes for all operations in the West Bureau.

The project site is served by the West Los Angeles Community Police Station, located at 1663 Butler Avenue, approximately 2.7 miles west of the project site as, shown in **Figure IV.J.2-1**, *Location of West Los Angeles Community Police Station*. The West Los Angeles Community Police Station serves an area that is approximately 65.14 square miles in size, includes approximately 748 street miles, and is bordered by the cities of Beverly Hills, Culver City, Santa Monica, as well as Los Angeles County and the Pacific Ocean. The service boundaries of the West Los Angeles Community Police Station are Mulholland Drive to the north, and the Los Angeles City boundary to the east, south, and west. The West Los Angeles Community Police Station provides service to a residential population of approximately 228,000 residents.[3] According to the LAPD, the service population increases to approximately half a million people when taking into account those that work in and visit West Los Angeles, and those that attend surrounding educational institutions including the University of California at Los Angeles (UCLA).[4] Based on the most recent information provided by LAPD, the West Los Angeles Community Police Station consists of approximately 214 sworn officers and 13 civilian staff members.[5]

The area served by the West Los Angeles Community Police Station is further divided into several reporting districts. The project site is located within Reporting District (RD) 839. The service boundaries of RD 839 are Santa Monica Boulevard to the north, the Los Angeles City boundary to the east, Olympic Boulevard to the south, and Fox Hills Drive to the west.

In the event a situation should arise requiring increased staffing, additional officers can be called in from other LAPD community police stations. Further, as mentioned above, the West Los Angeles Police Station shares a boundary with Los Angeles County. As with all municipal police departments in Los Angeles County, the LAPD participates in the Mutual Aid Operations Plan for Los Angeles County. The Mutual Aid Operations Plan is a reciprocal agreement between signatory agencies (in this case, the County of Los Angeles and city or other local police departments) to provide police personnel and resources to assist other member agencies during emergency and/or conditions of extreme peril. **Table IV.J.2-1**, *Population, Officer, Crime, and Response Time Comparison,* provides statistics for the West Los Angeles Community Police Station and Citywide service areas in terms of population, sworn officers, crimes, and average response times. The estimates are based on the most recent information available on the LAPD COMSAT web site, and through the Community Relations Division of the LAPD, as cited above. As previously discussed and shown in Table IV.J.2-1, the West

[3] *LAPD About West LA website, http://www.lapdonline.org/west_la_community_police_station/content_basic_view/1630, accessed April 1, 2011.*

[4] *Ibid.*

[5] *Officer Marco Jimenez, LAPD, Community Relations Division, Phone conversation with PCR, July 21, 2011;*

Table IV.J.2-1

Population, Officer, Crime, and Response Time Comparison

Service Area	Square Miles	Population	Sworn Officers	Officer/ Resident Ratio	Crimes	Crimes per 1,000 Residents	Average Response Time
West Los Angeles Community Police Station	65.14	228,000	214 [a]	1/1,065	17,025[b]	75	7.6 minutes [b]
Citywide	472.67 [c]	4,003,236[c]	9,904 [c]	1/404	445,222[b]	111	5.8 minutes [b]

[a] *LAPD About West LA website, http://www.lapdonline.org/west_la_community_police_station/content_basic_view/1630, accessed April 1, 2011.*

[b] *Officer Marco Jimenez, LAPD, Community Relations Division, Phone conversation with PCR, July 21, 2011; Fax communication to PCR on July 25, 2011 , "Crimes by Reporting District.." .*

[c] *LAPD website, Citywide Crime Statistics, http://www.lapdonline.org/assets/pdf/cityprof.pdf, accessed April 1, 2010.*

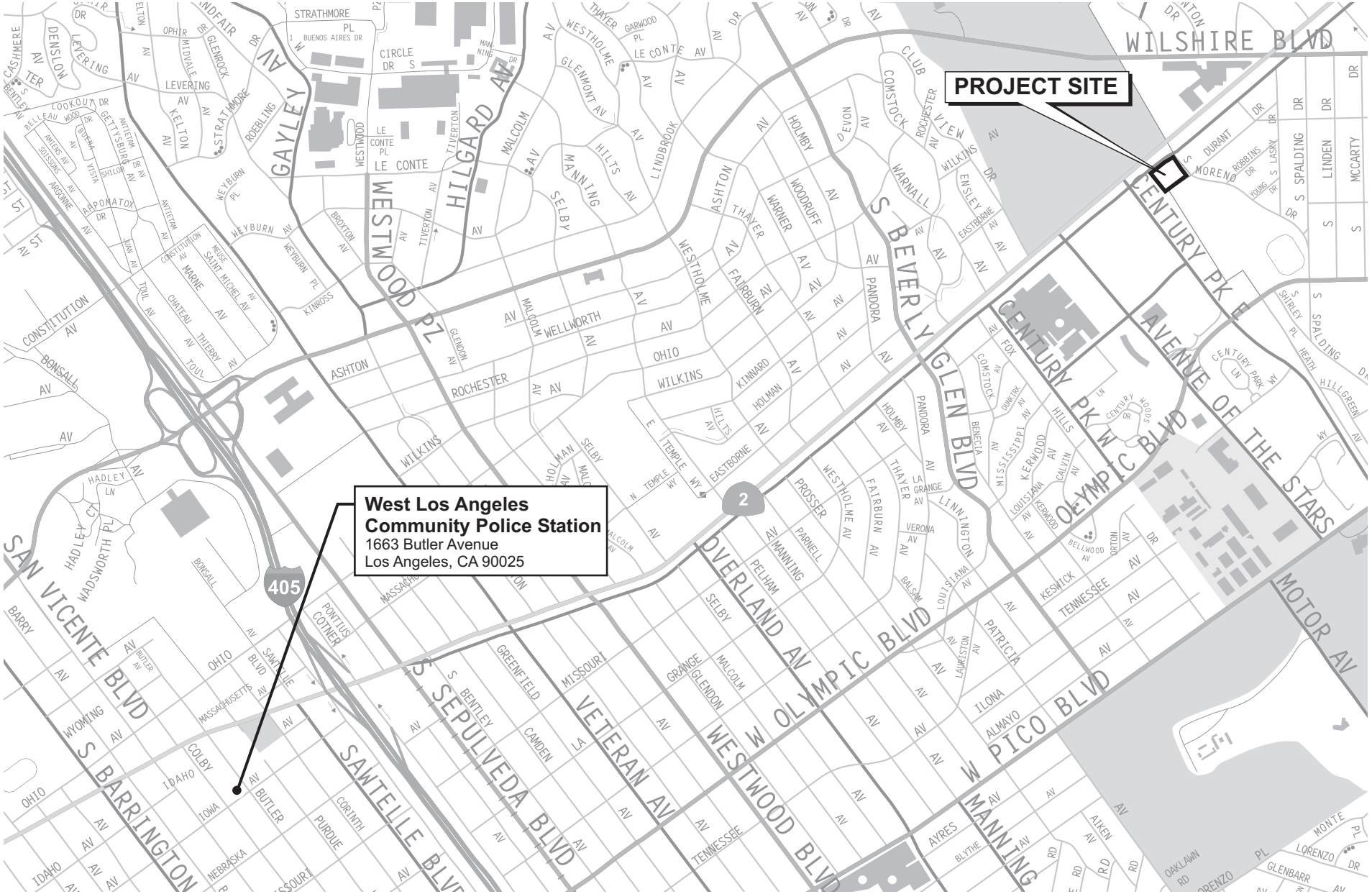
Source: PCR Services, June 2011.

Los Angeles Community Police Station has 214 sworn officers. Based on the West Los Angeles service population of approximately 228,000 residents, the officer-to-resident ratio is approximately one officer per 1,065 residents. Based on the Citywide service population of approximately 4,003,236 residents and 9,904 sworn officers, the citywide ratio is approximately one officer per 404 residents.

Within West Los Angeles and Citywide, the number of crimes per 1,000 residents is 75 and 111 crimes per 1,000 residents, respectively. The average response time of the West Los Angeles Community Police Station to emergency calls is 7.6 minutes. The Citywide average is 5.18 minutes.

Table IV.J.2-2, *Crime Statistics,* provides a breakdown of the crime statistics for RD 839, the West Los Angeles Community Police Station, and Citywide. As indicated in Table IV.J.2-2, burglary/theft vehicle and other theft account for the highest crime occurrence in RD 839. and the West Los Angeles area making up approximately 33 percent and 18 percent of all crimes, respectively. The most prevalent crime Citywide is other assault making up approximately 7 percent of all crimes committed within the City. The total number of crimes reported within RD 839 (530 crimes) and the West Los Angeles Area (17,035 crimes) make up approximately 0.12 percent and 3.8 percent, respectively, of the total crimes reported Citywide.

In addition to the services provided by the LAPD, additional security services in the project area are provided by the Century City Business Improvement District (CCBID). The CCBID provides a range of services to enhance commerce and increase pedestrian flow within Century City. Among the services provided is the Safety Ambassador Bike Patrol Program. This program provides two unarmed officers, 8 hours daily, six days a week. Their duties include patrolling of public areas; crime prevention activities; reporting of suspicious activity, criminal actions and emergencies to LAPD; and responses to non-violent crimes.



- PRELIMINARY WORKING DRAFT -

PCR

N

0 0.5 Miles

Location of West Los Angeles Community Police Station

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.J.2-1

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Table IV.J.2-2

Crime Statistics

Crime	RD 839		West Los Angeles		Citywide	
	Number	Percent	Number	Percent	Number	Percent
Burglary	3	1	699	4	17,347	4
Robbery	3	1	184	1	10,904	2
Weapon	2	0	35	0	1,247	0
Murder	0	0	2	0	299	0
Rape	0	0	19	0	809	0
Aggravated Assault	1	0	81	0	9,286	2
Other Assault	22	4	869	5	32,563	7
Against Family Child	0	0	14	0	882	0
Discovered Condition	3	1	29	0	417	0
VAG	2	0	99	1	1,400	0
Other Sex Offense	2	0	89	1	3,189	1
Pimping/Pandering	0	0	0	0	55	0
Theft from Person	0	0	17	0	1,268	0
Embezzlement	4	1	42	0	669	0
Burglary/Theft Vehicle	51	10	1,480	9	27,541	6
Other Theft	123	23	1,500	9	25,744	6
Vehicle Theft	1	0	409	2	17,510	4
Forgery/Counterfeiting	20	4	166	1	2,536	1
Fraud	0	0	9	0	299	0
Vandalism	13	2	776	5	19,953	4
All other violations	280	53	10,506	62	271,304	61
Total	**530**	**100**	**17,025**	**100**	**445,222**	**100**

Source: Fax communication to PCR Services from Officer Marco Jimenez, Los Angeles Police Department, Community Relations Division, July 25, 2011, "Crimes by Reporting District of Occurrence."

3. PROJECT IMPACTS

a. Methodology

The determination of significance relative to impacts on police protection services is based on the ability of police personnel to adequately serve the existing and future population, including the proposed project, while taking into consideration the project's proposed security and/or design features intended to reduce the demand for police protection services. The analysis presents statistical data for the West Los Angeles Community Police Station, data which was provided through the LAPD computer statistics website (COMPSTAT) and which was compiled and provided by the LAPD Community Relations Division.. Data include the ratio of crimes per residents and the ratio of officer per residents. Potential impacts to police protection services is evaluated based on two criteria consistent with the significance threshold criteria set forth in the *City of Los Angeles CEQA Thresholds Guide*, which are outlined in detail below. The first criterion is the ability of the West Los Angeles Community Police Station to meet additional demand for police protection services resulting from project development. The second criterion is to what extent the project's proposed security and/or design features would reduce the demand for police protection services. Based on

these criteria, a determination was made as to whether police facilities could accommodate the additional demand for police protection services resulting from the proposed project without the need for a new facility or the alteration of existing facilities.

Additional demand is considered to be an increase in the number of crimes resulting from the project's net residential population increase. The number of annual crimes generated by the proposed project was calculated by multiplying the annual per capita crime rate in the West Los Angeles Community Police Station service area by the project's net increase in residential population. The per capita rate is determined by dividing the total crimes in the police station service area by the service area's population.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a screening question that addresses impacts with regard to police protection service. This question is as follows:

> *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

Police Protection?

In the context of this question from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide*, states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project.
- The demand for police services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand.
- Whether the project includes security and/or design features that would reduce the demand for police services.

Based on these factors, the project would normally have a significant impact on police services if:

POL-1 The project would generate a demand for police facilities or services that could not be accommodated by the expected level of service available at buildout, taking into consideration the project's security and/or design features, such that the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, would be required to maintain service.

c. Project Design Features

(1) Construction

The proposed project would include numerous features to secure the site during project construction and limit circumstances that would require police services. Access to the site would be highly controlled to

prevent public access, particularly by Beverly Hills High School students. The project site would be secured during construction by a minimum 12-foot high fence, with aesthetic treatment. Entries and exits would be limited and monitored for access by security guards. All workers and vehicles would be required to sign into and out of the project site. Background checks, including fingerprint verification, would be performed for construction managers/supervisors and workers with potential student contact (e.g. flagmen, crossing-guards, etc.). Such potential workers having a prior felony record would not be permitted to work at the project site. Also, all construction employees, subcontractors, materials suppliers, or consultants would be prohibited from having direct contact with school students. Further, crossing guards would be provided during project construction to ensure safe pedestrian travel for students.

In order, to further address safety issues, the project would provide a community liaison to address safety concerns at the site. The name and contact info for the Community Liaison would be posted in a public location.

(2) Operation

The proposed project would include numerous measures to ensure the safety of its residents and site visitors. Security measures, including controlled access, would be included as part of facility operations. Project staff would be trained and project facilities/access would be designed to assist in crime prevention efforts and to reduce the demand for police protection services. Site security would include provision of 24-hour video surveillance and full time security personnel. Duties of the security personnel would include but would not be limited to assisting residents and visitors with site access; monitoring entrances and exits; managing and monitoring fire/life/safety systems; and patrolling the property. The project design also includes features to enhance site security including such items as lighting of entry-ways and public areas.

d. Analysis of Project Impacts

Demand for police services from project activities would be similar for development under the Conventional Parking Option and the Automated Parking Option. The construction programs of both would be the same except for lesser construction for a smaller ancillary building with the Automated Parking Option. At the same time, the project design features for providing safety during project construction would be the same. Likewise, project operations with both parking options would include the same number of site residents and visitors carrying out similar residential activities. Also, development with both parking options would include the same site security features. As such, the following analysis addresses the impacts of both the Conventional Parking Option and the Automated Parking Option.

(1) Construction

Construction-related traffic on adjacent streets could potentially affect emergency access to the project site and neighboring uses. Temporary lane closures for utility connections and construction-related traffic could increase travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction (i.e., for the movement of construction equipment and hauling of excavated materials). As such, construction activities could temporarily increase response time for emergency vehicles to local businesses and/or residences on Santa Monica Boulevard and Moreno Drive, due to travel time delays to through traffic.

However, the impacts of such construction activity would be of short duration, on an intermittent basis, and would be coordinated with LAPD. Further, as described in Section IV.K, Transportation and Circulation, of this Draft EIR, mitigation measures would be implemented for the project that would reduce the potential for construction activities to impact emergency response times and emergency access. Project construction would be controlled by a Construction Management Plan that would include the following provisions: deliveries and pick-ups of construction materials would be scheduled during non-peak travel periods and would be coordinated to accommodate direct access to the project site, without staging on roadways; access would remain unobstructed for land uses in proximity of the project site during project construction; temporary lane closures, when needed, would maintain traffic in both directions and would be scheduled to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. Further, emergency vehicle drivers have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Therefore, construction impacts regarding emergency access, and related safety would be less than significant.

During construction, equipment and building materials would be temporarily stored on-site, which could result in theft. This could potentially necessitate police involvement unless adequate safety and security measures are implemented to secure the site. As discussed above, the perimeter of the project site would be surrounded by a 12-foot construction wall along the project boundary adjacent to Beverly Hills High School. All entry and exit points would be monitored during construction operations. A security guard would log all workers and vehicles into and out of the project site. Implementation of the project design features would help deter potential crime-related activity on-site and in the project vicinity during construction, thus reducing the demand on police protection services. Therefore, impacts to police protection services during construction of the proposed project would be less than significant.

(2) Operation

As discussed above, the project site is served by the West Los Angeles Community Police Station, which consists of approximately 214 sworn officers and 13 civilian employees. As shown in Table IV.J.2-1, the West Los Angeles Community Police Station provides police protection services to a residential population of approximately 228,000 people and reported 17,025 crimes. By dividing the number of annual crimes by the residential population of the West Los Angeles Area, a generation factor of 0.075 annual crimes per capita was derived. The project would generate approximately 379 new residents.[6] Based on the generation factor of 0.075 crimes per capita, and without accounting for project security features and personnel, the residential component of the proposed project could potentially result in twenty-eight additional crimes per year. This represents an increase of less than 0.2 percent of the crimes reported in the West Los Angeles Area.

The increase in population from 228,000 residents to 228,379 residents in the West Los Angeles Community Police Station service area would only alter the officer to resident ratio from one officer per 1,065 residents to one officer per 1,069 residents, assuming no additional officers are hired. If it were determined that additional officers would be needed, the project's contribution would be less than one officer (379 new residents x one officer per 1,065 residents = 0.36 additional officer).

[6] *Century City makes up the entirety Census Tract 2679.01. According to the 2010 Census data, there were 2,428 residents and 1,812 housing units in Century City, for an average 1.34 persons per household.*

Additionally, as described above, the project would provide extensive security features on-site including provision of 24-hour video surveillance, 24-hour security personnel, controlled building and parking access, and implementation of a secure perimeter with a combination of fencing, lighting, and landscaping to prevent loitering or unauthorized access to the project site. The on-site security personnel would provide a deterrent and an on-site first responder capability for many security issues. Together, these security features would help reduce the potential for on-site crimes, including loitering, theft, and burglaries. Also, as noted above, additional security services are also provided in the project area by the Century City Business Improvement District (CCBID), which provides patrol and crime prevention services in the project area. Therefore, due to the minimal impact the proposed project would have on police protection services, the security personnel and features incorporated into the project and the extra security patrols in Century City provided by the CCBID, the project would not result in demand for additional police protection services that would exceed the capability of the LAPD to serve the project site.

The project would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Therefore, potential impacts to the capability of existing police protection services would be less than significant.

With regard to the project's impacts on the Beverly Hills Police Department (BHPD), the project's negligible increase in demand could be accommodated by the West Los Angeles Community Police Station. As mentioned above, in the extraordinary circumstance that an emergency response exceeds the capacity of the West Los Angeles Station, additional resources could be drawn from other nearby LAPD Stations, and assistance would not be required from the BHPD. There is no individual and exclusive agreement between LAPD and BHPD, or between the City of Los Angeles and the City of Beverly Hills that would require the BHPD to respond to incidents at the project site. State law that allows a law enforcement agency to request assistance from other jurisdictions applies to certain non-project related circumstances, such as riots or other significant civil disturbances. As a result, the project would not result in an increased demand for BHPD police protection services.

4. CUMULATIVE IMPACTS

Section III of this Draft EIR identifies 40 related projects that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative analysis on police protection services, only those related projects located within the West Los Angeles Community Police Station service area are considered as related projects. Projects located in other jurisdictions would be served by their respective police departments (e.g., BHPD). Of the 40 related projects identified in Section III, 18 are located within the West Los Angeles Community Police Station service area as listed in **Table IV.J.2-3**, *Related Projects Within West Los Angeles Community Police Station Service Area*. The related projects include various residential, commercial/retail, office, and hotel uses. Similar to the proposed project, the number of annual crimes anticipated to be generated by related projects was estimated based on residential and non-residential increases in population. As shown in Table IV.J.2-3, related projects could potentially generate 752 crimes per year more than that which would occur if no development was to take place. The proposed project in conjunction with related projects could therefore generate 780 additional crimes per year. This represents an approximate five percent increase in annual crimes. However, related projects (particularly those of a larger nature) would likely be subject to discretionary review on a case-by-case basis by the LAPD to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Additionally, similar to the proposed project, related projects would generate revenue to the City's general fund that could be used to fund LAPD expenditures as necessary to offset the cumulative incremental impact

Table IV.J.2-3

Related Projects Within West Los Angeles Community Police Station Service Area

Map No.[a]	Project	Location	Residential[b] and Non-Residential[c] Population	Approximate No. of Crimes[d]
1	Office Building	10400 Ashton Avenue	70	5
2	Mixed-Use Development	10700 Santa Monica Blvd	167	13
3	Mixed-Use Development	10955 Wilshire Blvd	287	22
4	Mixed-Use Development	10857 Santa Monica Blvd	145	11
5	Office Building	2142 Pontius Ave	70	5
6	Mixed-Use Development	9001 Pico Blvd	90	7
7	Mixed-Use Development	1130 Gayle Ave	118	9
8	Mixed-Use Development	1777 Westwood Blvd	118	9
9	Condominium	10777 Wilshire Blvd	121	9
10	Convenience Store	900 Gayley Ave	8	1
11	Mixed-Use Development[e]	9760 Pico Blvd	0	0
12	Condominium	1929 Beloit Ave	127	10
13	Museum of Tolerance Expansion[e]	9786 Pico Blvd	0	0
14	Century City Westfield Expansion	10250 Santa Monica Blvd	1,965	147
15	Mixed-Use Development	11122 Pico Blvd	1,885	141
16	Mixed-Use Development	2025 Avenue of the Stars	1,628	122
17	Condominium	10331 Bellwood Ave	319	24
18	Office	1950 Avenue of the Stars	2,903	218
		Related Projects Total	**10,021**	**752**
		Proposed Project Total	**379**	**28**
		Grand Total	**10,400**	**780**

[a] *Corresponds with Map Nos. on Figure III-1 in Section III of this Draft EIR.*

[b] *For related projects with residential uses, the residential population was determined by multiplying the number of residential units by the average household size in the West Los Angeles community plan area.*

[c] *For related projects with non-residential uses, the non-residential population was determined based on the following generation factors as indicated in the City of L.A. CEQA Thresholds Guide (2006): 4 persons per 1,000 square feet of office space, 3 persons per 1,000 square feet of retail space, and 1.5 persons per hotel room.*

[d] *The residential and non-residential population was multiplied by the generation factor of 0.075 crimes per capita to estimate the number of crimes generated by related projects.*

[g] *These projects do not contain any uses that would directly or indirectly generate any residents.*

Source: PCR Service Corporation, 2011.

on police services. Furthermore, larger projects would be likely to have on-site security personnel and safety features like those of the proposed project that would further reduce demand on police services. Therefore, cumulative impacts to the existing police protection services would be less than significant.

5. MITIGATION MEASURES

With incorporation of LAMC requirements, project design features, and mitigation measures set forth in Section IV.K, Transportation and Circulation, of this Draft EIR, impacts to police protection services during construction and operation of the proposed project would be less than significant. Therefore, no additional mitigation measures are required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

The project would result in less than significant impacts to police protection services with the implementation of LAMC requirements, project design features, and recommended mitigation measures.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
3. SCHOOLS

1. INTRODUCTION

This section evaluates potential impacts on school facilities operated by Los Angeles Unified School District (LAUSD). The analysis estimates the number of students that would be generated by the proposed project using LAUSD student generation rates and focuses on whether LAUSD school facilities would have sufficient available capacity to accommodate these students. The analysis addresses all levels of educational facilities operated by LAUSD (i.e., elementary, middle, and high schools), as well as compliance with applicable regulations. The analysis is based, in part, on written correspondence with LAUSD, which is included in Appendix I.3 of this Draft EIR.

While this section focuses on enrollment related effects on LAUSD schools, potential environmental impacts to Beverly Hills High School (located immediately south of the project site) during construction and operation of the proposed project are analyzed in detail in other sections of the Draft EIR including Section IV.A, Aesthetics/Visual Resources; Section IV.B, Air Quality; Section IV.H, Land Use; Section IV.I, Noise; Section IV.J.1, Fire Protection; Section IV.J.2, Police Protection; and Section IV.K, Traffic and Circulation of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) California Education Code

Educational services for the project are subject to the rules and regulations of the California Education Code and governance of the State Board of Education. The State also provides funding through a combination of sales and income taxes. In addition, pursuant to Proposition 98, the State is also responsible for the allocation of educational funds that are acquired from property taxes. Further, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities.[1]

(2) Senate Bill 50

The Leroy F. Greene School Facilities Act of 1998 (known as Senate Bill 50), enacted in 1998, is a program for funding school facilities largely based on matching funds. The new construction grant provides funding on a 50/50 State and local match basis. The modernization grant provides funding on a 60/40 basis. Districts that are unable to provide some, or all, of the local match requirement and are able to meet the financial hardship provisions may be eligible for additional State funding.[2]

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[1] *California Education Code Section 17620(a)(1).*

[2] *State of California, Office of Public School Construction, An Overview of the State School Facility Programs, February 2010.*

SB 50 permits the LAUSD to levy a fee, charge, dedication, or other requirement against any development project within its boundaries, for the purpose of funding the construction or reconstruction of school facilities. SB 50 also sets a maximum level of fees a developer may be required to pay. LAUSD currently collects development fees at a rate of $3.87 per square foot of new residential construction, $0.47 per square foot of commercial/industrial construction, $0.28 per square foot of self-storage, and $0.07 per square foot for parking structures.[3] Pursuant to Government Code Section 65995, the payment of these fees by a developer serves to mitigate all potential impacts on school facilities that may result from implementation of a project to a less than significant level. [4]

b. Existing Conditions

LAUSD is the largest (in terms of number of students) public school system in California and the second-largest in the U.S. LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, all or portions of 31 other cities, as well as several unincorporated areas of Los Angeles County. LAUSD provides kindergarten through high school (K–12) education to a total of 671,648, students, enrolled throughout 1,092 schools and centers, including: 526 elementary schools, 131 middle schools, 140 high schools, 173 charter schools, 40 continuation senior high schools, 32 community high school and alternative work centers, 22 SPAN schools, 18 special education schools, and 10 community day schools. In addition, the LAUSD provides preschool, adult education, and occupational education through 241 other schools and centers.[5] The LAUSD employs about 68,902 personnel, about half (46 percent) of whom are classroom teachers. Overall, the Los Angeles Unified School District's Fiscal Year 2010-2011 total budget was around $5.1 billion.[6]

Currently, 33 schools are on multi-track year-round schedules to accommodate the heavy enrollment at these facilities.[7] To help reduce overcrowding at public schools, LAUSD is continuing the implementation of a $20.1 billion voter-approved program initiated in 1997 to build new schools and reduce overcrowding and improve existing campuses throughout the LAUSD.[8] In addition to utilizing SB 50 fees and the 1997 voter approved fees, other major statewide funding sources for school facilities are Proposition 47, a $13.2 billion bond approved in November 2002 containing $11.4 billion for K–12 public school facilities, and Proposition 55, a $12.3 billion bond approved in March 2004 containing $10 billion to address overcrowding and accommodate future growth in K-12 schools. Local measures provide additional funding for existing and new school construction projects.

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3 *Residential Developer fee rates within the LAUSD are effective October 23, 2010 - October 22, 2011; Los Angeles Unified School District Developer Fee Program Office; fax communication, April 15, 2011 .*

4 *Calif. Government Code § 65996.*

5 *LAUSD, Fingertip Facts 2010-2011. Available at: http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/10-11FINGERTIPFACTS_REVISED228.PDF Accessed April 1, 2011.*

6 *LAUSD, Fingertip Facts 2010-2011. Available at: http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/10-11FINGERTIPFACTS_REVISED228.PDF Accessed April 1, 2011.*

7 *LAUSD Office of the Chief Operating Officer. 2010-2011 New and Continuing Multitrack Year-Round Schools (Alphabetical), July 1, 2010. http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/ABOUT_US/INFORMATION/DISTRICT_CALENDARS/2010-2011%20SCHOOL%20TYPE-ALPHA-CAL%20SCHEDULE.PDF, accessed April 1, 2011.*

8 *LAUSD, Fingertip Facts 2010-2011. Available at: http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/10-11FINGERTIPFACTS_REVISED228.PDF Accessed April 1, 2011.*

Utilizing the funding sources described above, LAUSD has implemented the New School Construction Program, a multi-year capital improvement program. The New School Construction Program is the major component of LAUSD's plan to relieve overcrowding in its schools by returning students to a single-track calendar, reducing class sizes to agreed limits at all grade levels, providing special education facilities, providing pre-kindergarten facilities, and reducing the reliance on portable classrooms. Since the first bond was passed in 1997, LAUSD had completed 101 new K-12 schools and nearly 20,000 modernization and repair projects. Thirty new K-12 schools remain to be built under the program.[9]

LAUSD is currently divided into eight Local Districts; with the proposed project site being located in Local District 3. As shown in **Figure IV.J.3-1**, *Location of Schools Serving the Project Site*, the project site is located within the attendance boundaries of Westwood Elementary School, Emerson Middle School, Webster Middle School, and University High School. These schools are currently operating on a single-track calendar in which instruction generally begins in mid September and continues through late June. In addition, the project site is located in a middle school attendance option area, in which students have a choice of attending either Emerson Middle School or Webster Middle School. **Table IV.J.3-1**, *Capacity and Enrollment of LAUSD Schools Serving the Project Site,* lists these schools, as well as their location, distance from the project site, capacity, actual and residential enrollments, and available seating capacity. Per the LAUSD, available seating capacity is based on residential enrollment (i.e., the number of students living in a school's attendance area who are eligible to attend the school) compared to the respective school's capacity. As shown in Table IV.J.3-1, which is based on the information that is available from LAUSD, all the schools are operating within capacity with the exception of Westwood Elementary School.

Westwood Elementary School

Westwood Elementary School is located at 2050 Selby Avenue in the City of Los Angeles, approximately 1.8 miles southwest of the project site. Westwood Elementary School operates on a single-track calendar in which the school year begins in mid-September and ends in late June. Based on the school's capacity of 830 students and a residential enrollment of 761 students, the school has an estimated available capacity of 69 seats.

Emerson Middle School

Emerson Middle School is located at 1650 Selby Avenue and is approximately 1.7 miles southwest of the project site. Emerson Middle School operates on a single-track calendar in which the school year begins in mid-September and ends in late-June. Based on the school's capacity for 1,016 students and a residential enrollment of 604 students, the school has 412 seats of estimated available capacity.

Webster Middle School

Webster Middle School is located at 11330 W. Graham Place and is approximately 3.5 miles southwest of the project site. Webster Middle School operates on a single-track calendar in which the school year begins in mid-September and ends in late-June. Based on the school's capacity for 870 students and a residential enrollment of 857 students, the school has an estimated 13 seats of available capacity. LAUSD considers schools with less than a safety margin of 30 seats to be overcrowded.

[9] *Ibid.*

Table IV.J.3-1

Existing Capacity and Enrollment of LAUSD Schools Serving the Project Site

School	Distance From Project Site	Capacity	Resident Enrollment	Actual Enrollment	Available Seating Capacity [a]
Westwood Elementary School (K-5) 2050 Selby Avenue	1.8 miles	830	761	778	69
Emerson Middle School (6-8) 1650 Selby Avenue	1.7 miles	1,016	604	686	412
Webster Middle School (6-8) 11330 W. Graham Place	3.5 miles	870	857	704	13[b]
University High School (9-12) 11800 Texas Avenue	3.9 miles	2,214	853	2,239	1,361

[a] *Capacity minus residential enrollment*
[b] *LAUSD considers a school to have a shortage of capacity if there is not a safety factor of 30 seats available.*

Source: LAUSD Facilities Services Division, Letter to PCR Services, June 23, 2011.

University High School

University High School is located at 11800 Texas Avenue and is approximately 3.9 miles west of the project site. University High School operates on a single-track calendar in which the school year begins in early September and ends in late-June. Based on the school's capacity for 2,214 students and a residential enrollment of 853 students, the school has 1,361 seats of estimated available capacity.

3. PROJECT IMPACTS

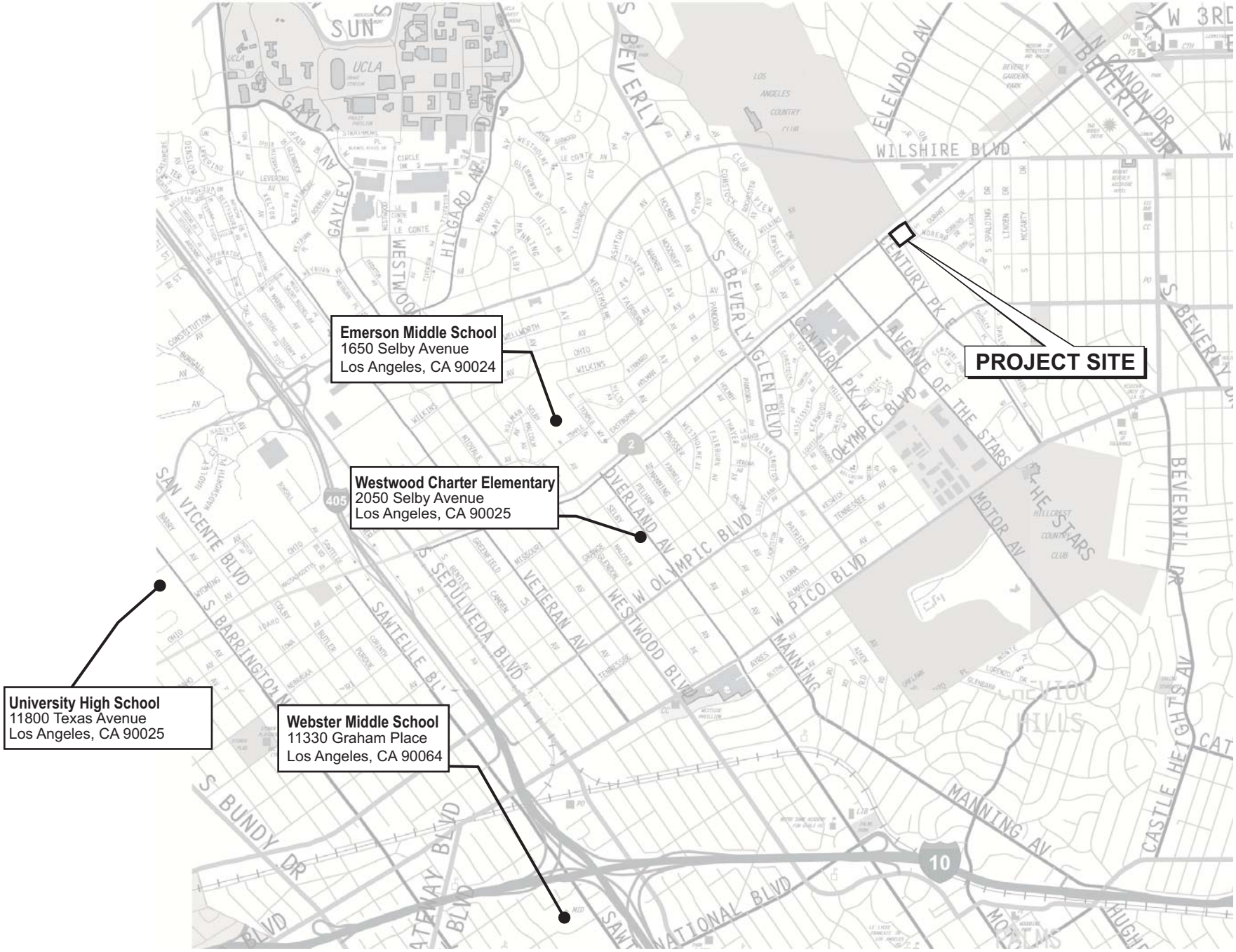
a. Methodology

(1) Construction

Project construction would not generate new students needing to attend local schools; and therefore, construction effects on local school enrollment are not analyzed further. Potential physical impacts of the project on Beverly Hills High School (located immediately south of the project site) during construction and operation of the proposed project are analyzed in detail in other sections of the Draft EIR including Section IV.A, Aesthetics/Visual Resources; Section IV.B, Air Quality; Section IV.H, Land Use; Section IV.I, Noise; Section IV.J.1, Fire Protection; Section IV.J.2, Police Protection; and Section IV.K, Traffic and Circulation of this Draft EIR.

(2) Operation

The analysis of enrollment effects on schools is based in part on the ability of LAUSD school facilities to accommodate the potential increase in students generated from development of the project. The analysis estimates the number of students that would be generated by the proposed project using LAUSD student generation rates, and focuses on whether LAUSD school facilities expected to serve the project would have



PCR

Location of Schools Serving the Project Site

10000 Santa Monica Boulevard
Source: PCR Services Corp., 2011

FIGURE
IV.J.3-1

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sufficient available capacity to accommodate these students. The analysis addresses all levels of education facilities operated by LAUSD (i.e., elementary, middle, and high schools); and focuses on the schools that would serve the project site. It also addresses state regulations, i.e. SB 50, and related development fees as a mechanism for providing new school facilities and addressing school impacts of the proposed project.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a screening question that addresses impacts with regard to police protection service. This question is as follows:

> *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- Schools?

In the context of this question from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide*, states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area;
- The demand for school services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to LAUSD services (facilities, equipment, and personnel) and the project's proportional contribution to the demand;
- Whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and
- Whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

Based on these factors, the *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact on schools if:

> **SCH-1** The project would require the addition of a new school or the expansion, consolidation or relocation of an existing facility to maintain service levels.

c. Project Design Features

There are no project design features, such as an on-site school facility, that relate to the proposed project's enrollment related effects.

d. Analysis of Project Impacts

Project impacts on school services would be the same with the Conventional Parking Option and the Automated Parking Option. Both projects would generate the same number of residential units and resident students attending LAUSD schools. As such, the following analysis addresses the impacts of both the Conventional Parking Option and the Automated Parking Option.

The LAUSD has established student generation rates for a variety of uses including residential development (single-family detached and multi-family attached).[10] The student generation rates for multi-family attached residential units, and the resulting number of students estimated by applying those rates to the project's 283 residential uses is shown in **Table IV.J.3-2**, *Estimated Number of Students to be Generated by the Proposed Project*. As indicated, in Table IV.J.3-2, the proposed project is estimated to generate 32 elementary school students, 16 middle school students, and 20 high school students, for a total of 68 students.

Table IV.J.3-2

Estimated Number of Students to be Generated by the Proposed Project

School Level	Elementary School (K-5)	Middle School (6-8)	High School (9-12)
LAUSD Student Generation Rate – Multi-Family Attached	0.1141[a]	0.0571[a]	0.0694[a]
Students Generated – 283 Units	32	16	20

[a] *Los Angeles Unified School District, Residential Development School Fee Justification Study, September 27, 2010.*

Source: PCR Services, June 2011.

Due to the anticipated demographics of the future residents of the project, the project's projected student generation is likely to be less than that estimated in the above analysis which is based on LAUSD generation factors. For instance, census tract information for the project vicinity indicates that in 2009 there were only 330 total school-aged children (ages 5-18) among 3,785 households.[11] This is a rate of 0.0871 students per household; where-as the total student generation used in the above analysis for all grade levels throughout the LAUSD is 0.2406 students per household. Using the 0.0871 students per household as a guide, the project would generate approximately 25 students; 37 percent of the 68 students estimated above. The above analysis is also conservative because it assumes that all of the residents with families in the development do not currently have students attending the affected schools. Furthermore, it is likely that a portion of the project's school-aged children would attend private schools, thus reducing increased demand on LAUSD schools.

As previously discussed, students generated by the proposed project would attend Westwood Elementary School, Emerson Middle School, Webster Middle School, and University High School. While Westwood

[10] *Los Angeles Unified School District, Residential Development School Fee Justification Study, September 27, 2010.*

[11] *US Census Bureau, 2005-2009 American Community Survey 5-Year Estimates: Census Tract 2679, Los Angeles County. California.*

Elementary School is a charter school, the school accepts all residents within the elementary school attendance boundaries. Information regarding LAUSD projections for 2013-2014 capacities and enrollments at the local schools are shown in **Table IV.J.3-3,** *Projected Capacity and Enrollment of LAUSD Schools Serving the Project Site with Proposed Project.* The most recent information provided by the LAUSD indicates that the school facilities serving the project site would be operating well below capacity for the 2013-2014 school year with the exception of Westwood Elementary School, which would be just below capacity with 31 available seats.[12] When the project-generated students are added to these projections (32 elementary school students, 16 middle school students, and 20 high school students), all school facilities serving the project site would continue to accommodate the new students with the exception of Westwood Elementary School. Westwood Elementary School would result in a shortage of 1 seat (31 – 32) with the addition of the project, or a shortage of 31 seats below the 30 seat safety margin used by LAUSD for defining overcrowded schools. Because the project site is located in a middle school attendance option area, the 16 middle school students generated by the proposed project would have the option to attend either Emerson or Webster Middle School. If all 16 middle school students choose to attend Emerson Middle School, it would still have an excess of 255 seats (271 – 16). If all 16 middle school students choose to attend Webster Middle School, it would still have an excess of 661 seats (677 – 16). With the addition of the project-generated number of high school students, University High School would still have an excess of 1,140 seats (1,160 – 20). These conclusions reflect potential impacts at the time of project completion when new students would begin to attend the local schools. It may be noted that if new students were to attend the local schools at the current time, an event not expected until project completion in 2016, Westwood Elementary (69 available seats less 30 project students), Emerson Middle School (412 available seats less 16 new students) and University High School (1,361 available seats less 20 new students) would all continue to have excess capacity. Webster Middle School currently has 13 available seats which is fewer than the 30 seat safety factor and is considered overcrowded. If all of the 16 projects students were to select to attend Webster Middle School today, there would be a shortage of 3 seats or 33 seats less than the 30 seat safety factor used for identifying overcrowded schools.

Pursuant to Section 65995 of the California Government Code, the project would be required to pay fees in accordance with SB 50. Payment of such fees are deemed to mitigate project impacts regarding the construction of new school facilities, whether schools are at capacity or not. As a result, pursuant to SB 50, project-related impacts on LAUSD school facilities including schools that are overcrowded (e.g. Webster Middle School at the time of project completion, or Westwood Elementary School against a current baseline), would be reduced to a less than significant level.

If project generated students were to attend public schools in other school districts (e.g., Beverly Hills Unified School District), they would be required to obtain an inter-district transfer permit issued by both the school within which the student is enrolled, as well as the school of interest. Furthermore, approvals for inter-district transfers are subject to a determination that the incoming transfer students could be accommodated without creating an impact on its existing facilities. Thus, potential project-related impacts associated with capacity within the Beverly Hills Unified School District would not occur.

[12] *Capacity and enrollment information provided by LAUSD in a letter to PCR Services, June 23, 2011; included as Appendix I.3 of the Draft EIR.*

Table IV.J.3-3

Projected Capacity and Enrollment of LAUSD Schools Serving the Project Site with Proposed Project

School	Projected Capacity[a]	Projected Enrollment[b]	Projected Seating Overage/ (Shortage)[c]	Project-Generated Students	Projected Enrollment With Project	Projected Seating Overage/ (Shortage)[c] With Project
Westwood Elementary School (K-5) 2050 Selby Avenue	812	781	31	32	813	(1)
Emerson Middle School (6-8) 1650 Selby Avenue	900	629	271		645	255
Webster Middle School (6-8) 11330 W. Graham Place	1,494	817	677	16[d]	833	661
University High School (9-12) 11800 Texas Avenue	2,088	928	1,160	20	948	1,140

[a] *Based on a 5-year projection that takes into consideration the operational goals of the New School Construction Program (i.e., full-day kindergarten, reduced class sizes, etc.).*

[b] *Based on a 5-year projection of the total number of students living in the school's attendance area and who are eligible to attend the school. Includes secondary-grades magnet students.*

[c] *Projected capacity minus projected enrollment.*

[d] *The proposed project is located in a middle school attendance option area. Therefore, the project-generated students could potentially attend either Emerson or Webster Middle School.*

Source: LAUSD Facilities Services Division, Letter to PCR Services, June 23, 2011; PCR Services 2011.

(3) Consistency with Regulatory Framework

The proposed project would be required to comply with SB 50, which requires payment of fees to mitigate the project's impacts on LAUSD. Payment of the SB 50 fees would ensure consistency of the proposed project with applicable regulations.

4. CUMULATIVE IMPACTS

Section III of this Draft EIR identifies 40 related projects that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative impact analysis on schools, only those related projects located within the attendance boundaries of the schools serving the project site (Westwood Elementary School, Emerson Middle School, Webster Middle School, and University High School) have been considered. Moreover, related projects that are located within the attendance boundaries but do not constitute uses that typically generate students (i.e., theaters, private schools, or senior housing) were also excluded from the analysis, as such uses would not be expected to generate students within a public school; and are not included in the LAUSD student generation rates for such uses.

Of the 40 related projects identified in Section III, 18 are located within the attendance boundaries of the schools serving the project site and are included in this cumulative analysis as listed in **Table IV.J.3-4**, *Related Projects Within Attendance Boundaries of LAUSD Schools Serving the Project Site*. These related projects would cumulatively generate, in conjunction with the proposed project, new students at Westwood Elementary School, Emerson Middle School, Webster Middle School, and University High School. The related projects include various residential, commercial/retail, and office uses. Similar to the proposed project, the number of students anticipated to be generated by related projects was estimated based on the type of development proposed. As shown in Table IV.J.3-4, related projects could potentially generate 80 students at Westwood Elementary School, 87 students at Emerson Middle School, 42 students at Webster Middle School, and 76 students at University High School. The proposed project in conjunction with related projects could therefore generate 112 students at Westwood Elementary School, 103 students at Emerson Middle School, 58 students at Webster Middle School, and 96 students at University High School. **Table IV.J.3-5**, *Projected Capacity and Enrollment of LAUSD Schools with Cumulative Development,* illustrates the cumulative impacts on projected enrollment, capacity, and seating at Westwood Elementary School, Emerson Middle School, Webster Middle School, and University High School. Based on the 2013 – 2014 estimates provide by LAUSD, all school facilities would be able to accommodate these new students with the exception of Westwood Elementary School. Westwood Elementary School would result in a shortage of 81 seats (812 – 893)), or 111 seats below the 30-seat safety factor with the addition of the proposed project and related projects. If all middle school students resulting from the proposed project choose to attend Emerson Middle School, it would still have an excess of 168 seats (900 - 732). If all middle school students resulting from the proposed project choose to attend Webster Middle School, it would still have an excess of 619 seats (1,494 – 887). University High School would still have an excess of 1.064 seats (2,088 – 1,024). As previously discussed, pursuant to Government Code Section 65995, the payment of the developer fees under the provisions of SB 50 would constitute full mitigation for all impacts to school facilities. Therefore, cumulative impacts to LAUSD schools serving the project site would be less than significant.

5. MITIGATION MEASURES

Implementation of the following mitigation measure would ensure that the project meets its obligation for the payment of school impact fees.

Mitigation Measure J.3-1: The project shall pay required school mitigation fees pursuant to Government Code Section 65995 and in compliance with SB 50 (payment of developer fees).

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts are less than significant; and no mitigation measures are required.

Table IV.J.3-4

Related Projects Within Attendance Boundaries of LAUSD Schools Serving the Project Site

Map No.[a]	Project	Location	No. of Students Generated [b,c,d] Elementary School (K-5)	Emerson Middle School (6-8)	Webster Middle School (6-8)	High School (9-12)
1	Office Building	10400 Ashton Ave	-	0	-	0
2	Mixed-Use Development [e]	10700 Santa Monica Blvd	0	0	0	0
3	Mixed-Use Development	10955 Wilshire Blvd	-	1	-	1
4	Mixed-Use Development [e]	10857 Santa Monica Blvd	5	3	3	3
5	Office Building	2142 Pontius Ave	-	0	-	0
6	Mixed-Use Development	9001 Pico Blvd	-	2	2	-
7	Mixed-Use Development	1130 Gayle Ave	-	3	-	3
8	Mixed-Use Development	1777 Westwood Blvd	-	3	-	3
9	Condominium	10777 Wilshire Blvd	-	3	-	4
10	Convenience Store	900 Gayley Ave	-	0	-	0
11	Mixed-Use Development	9760 Pico Blvd	-	0	0	-
12	Condominium	1929 Beloit Ave	-	4	-	4
13	Museum of Tolerance Expansion	9786 Pico Blvd	-	0	0	-
14	Century City Westfield Expansion [e]	10250 Santa Monica Blvd	31	15	15	19
15	Mixed-Use Development	11122 Pico Blvd	-	31	-	38
16	Mixed-Use Development [e]	2025 Avenue of the Stars	24	12	12	-
17	Condominium [e]	10331 Bellwood Ave	18	9	9	-
18	Office [e]	1950 Avenue of the Stars	2	1	1	1
	Related Projects Total		**80**	**87**	**42**	**76**
	Proposed Project Total		**32**	**16**	**16**	**20**
	Grand Total		**112**	**103**	**58**	**96**

[a] *Corresponds with Figure III-1 in Section III of this Draft EIR.*

[b] *Rounded to the nearest whole number. Therefore, totals may not sum exactly.*

[c] *Calculated by multiplying each of the proposed uses by its respective student generation rate issued by LAUSD. LAUSD has established student generation rates for residential (single-family detached and multi-family attached), retail and services, offices, research and development, industrial/warehouse/manufacturing, hospitals, hotels/motels, and parking structures.*

[d] *Please note that the attendance boundaries are not the same for all three levels of schools. A related project may be located within the attendance boundaries of the elementary school (Westwood Elementary School) but not within the attendance boundaries of the high school (University High School). This was taken into consideration when conducting the calculations presented. A "-" symbol indicates the related project is not located within the schools' identified attendance boundary.*

[e] *Project is located in a middle school attendance option area.*

Source: PCR Service Corporation, 2011

Table IV.J.3-5

Projected Capacity and Enrollment of LAUSD Schools with Cumulative Development

School	Projected Capacity	Projected Enrollment	Projected Seating Overage/ (Shortage)	Proposed Project + Related Projects Students	Enrollment with Proposed & Related Projects	Projected Seating Overage/ (Shortage)
Westwood Elementary School (K-5) 2050 Selby Avenue	812	781	31	112	893	(81)
Emerson Middle School (6-8) 1650 Selby Avenue	900	629	271	103	732	168
Webster Middle School (6-8) 11330 W. Graham Place	1,494	817	677	58	875	619
University High School (9-12) 11800 Texas Avenue	2,088	928	1,160	96	1,024	1,064

Source: PCR Services, July 2011.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
4. LIBRARIES

1. INTRODUCTION

This section describes existing library facilities and services in the project area, and provides an analysis of potential impacts on these facilities and services that would occur as a result of the proposed project. The analysis addresses available library capacity and whether it is sufficient to accommodate the population growth generated by the proposed project. The analysis is based in part on information provided by City of Los Angeles Public Library (LAPL).

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) City of Los Angeles General Plan Framework

The City of Los Angeles General Plan Framework, adopted in December 1996 and readopted in August 2001, provides general guidance regarding land use issues for the entire City of Los Angeles and defines Citywide policies regarding land use, including infrastructure and public services. Goals and policies for the provision of adequate library services and facilities to meet the needs of the City's residents are set forth in Objectives 9.20 and 9.21. Objective 9.20 proposes to adopt a Citywide library service standard by the year 2000. Policy 9.20.1, which further supports Objective 9.20, proposes the development of library standards dealing with the facilities' net floor area, the appropriate number of permanent collection books per resident, and service radii. Policy 9.20.2 proposes a Citywide policy for locating non-English language permanent collections. Objective 9.21 proposes to ensure library services for current and future residents and businesses. Policy 9.21.3, which supports Objective 9.21, encourages the inclusion of library facilities in mixed-use structures, in community and regional centers, at transit stations, and in mixed-use boulevards. Policy 13 within the General Plan Framework Implementation Programs Chapter holds the City Department of Libraries responsible for updating the Library Master Plan as well as providing sufficient capacity to correct existing deficiencies, identifying improvements to new library facilities, developing strategies to increase the distribution of library services, establishing a new City library service standard based on the needs of the City, and identifying funding sources for facility improvements. The implementation plans and policies set forth in the General Plan Framework have been addressed through the LAPL Branch Facilities Plan and the 1989 and 1998 Library Bond Programs.

(2) Los Angeles Public Library Branch Facilities Plan

The Los Angeles Public Library Branch Facilities Plan (Facilities Plan) guides the construction of branch libraries and specifies standards for the size and features of branch facilities based on the population served in each community. The Facilities Plan also outlines the required facilities expansion needs of the libraries within the City. The Facilities Plan was revised and recently approved by the Board of Library Commissioners on February 8, 2007. Under the 2007 Facilities Plan, the service population for a branch library is defined according to the size of the facility, as shown in **Table IV.J.4-1**, *City of Los Angeles Public Library Branch Building Size Standards,* LAPL bases the service population for a branch upon census tracts

Table IV.J.4-1

City of Los Angeles Public Library Branch Building Size Standards

Population Served	Size of Facility
Below 45,000	12,500 square feet
Above 45,000 [a]	14,500 square feet
Regional Branch	Up to 20,000 square feet

[a] *For a community with population above 90,000, consider adding a second branch to serve the area.*

Source: Los Angeles Public Library website, http://www.lapl.org/about/Branch_Facilities_Criteria.pdf, accessed April 5, 2011.

that are assigned to that branch. The Facilities Plan has been implemented with bond measures within two phases, the 1989 Bond Program and the 1998 Bond Program.

In 1989, City of Los Angeles voters approved Proposition 1, a $53.4 million Branch Library Facilities Bond, also known as the 1989 Library Bond Issue. Under Proposition 1, the Facilities Plan proposed to obtain new sites for building, renovating, and expanding libraries that were unable to serve the community sufficiently and/or were damaged by the Whittier earthquake. LAPL also successfully obtained additional funds from the Community Development Block Grant Award of federal funds from the California State Library Proposition 85, as well as from Friends of the Library groups, for a total branch construction program of $108 million. Under the 1989 Bond Program, 29 libraries were built.[1]

On November 3, 1998, Los Angeles voters approved Proposition DD, also known as the 1998 Library Facilities Bond, a $178.3 million bond for funding the construction, renovation, improvement, or expansion of 32 new branch libraries. As a result of effective project management, four additional projects were added to the scope of the overall facilities program. Of the 36 total projects, 18 existing library facilities were replaced with 18 new library facilities on the existing City-owned sites, nine libraries were constructed on newly acquired sites, five new libraries were constructed on acquired sites in communities that previously did not have library services, and with the four additional projects, existing libraries were renovated and expanded. The entire original Facilities Plan is completed.[2]

(3) Measure L

On March 8, 2011, Los Angeles voters approved Measure L, the Los Angeles Public Library funding initiative. Measure L changes the city charter, gradually raising the level of guaranteed funding of the library system to .03 percent of assessed property value over a period of four years (up from the current rate of .0175 percent). The LAPL estimates that this increase in funding will allow the LAPL to fully reimburse the general fund for all overhead expenses, restore library service on Mondays at all 73 libraries and on Sundays at nine libraries, and purchase new books.

[1] *Los Angeles Public Library website, Summary of Branch Facilities Plan Revision, available at: http://www.lapl.org/about/planning_overview.html accessed April 11, 2011.*

[2] *Ibid.*

b. Existing Conditions

The LAPL system provides library services to the City of Los Angeles. LAPL consists of the Central Library and 72 branch libraries, with a multimedia inventory of over six (6) million items and 2,300 computer workstations with access to the internet and electronic databases.[3] All branch libraries provide free access to computer workstations that are connected to the Library's information network. In addition to providing internet access, these workstations enable the public to search LAPL's electronic resources including the online catalog, over 100 subscription databases, word processing, language learning, literacy, and a large collection of historic documents and photographs. In addition, specially designed websites are provided for children, teens, and Spanish speakers.

LAPL is a member of the Southern California Library Cooperative (SCLC), an association of public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions. Participation in this program enables individuals to use their library cards in multiple jurisdictions, and allows for member libraries to receive compensation for such use.

LAPL service populations are based on the number of people residing in census tracts that are assigned to a specific library. Currently, there are no community branch libraries for the Century City area. However, LAPL has identified four LAPL libraries that would serve the proposed project: the West Los Angeles Branch Library, the Westwood Branch Library, the Robertson Branch Library, and the Palms-Rancho Park Branch Library. **Figure IV.J.4-1**, *Libraries Located in the Vicinity of the Project Site,* identifies the location of these library facilities in relation to the project site. **Table IV.J.4-2**, *Library Facilities Located in the Vicinity of the Project Site,* provides information regarding these libraries including their distance from the project site, size, population served, and hours of operation.

The West Los Angeles Branch Library at 11360 Santa Monica Boulevard is located approximately 2.5 miles southwest of the project site. This 13,740-square-foot branch serves a population of 39,147 people according to the LAPL. The library currently employs 8.5 full-time staff positions. The library includes a total of 47,123 volumes and has an annual circulation of 123,274 people. As a regional branch, this library supplements the services provided by the local branch libraries.

The Westwood Branch Library at 1246 Glendon Avenue is located approximately 2.8 miles west of the project site. This 12,500-square foot branch, which opened in May 2005, serves a population of 76,725 people according to the LAPL. The library currently employs 7.5 full-time staff positions. The library includes a total of 62,779 volumes and has an annual circulation of 249,767.[4]

The Robertson Branch Library at 1719 South Roberson Boulevard is located approximately 2.9 miles southeast of the project site. This 9,035-square-foot branch library serves a population of 51,559 people according to the LAPL. The library currently employs 7.5 full-time staff positions. The library includes a total of 40,324 volumes and has an annual circulation of 204,040.

[3] *LAPL. About the Library, News Room. Los Angeles Public Library Facts 2010 (for fiscal year 2008-09), available at: http://www.lapl.org/newsroom/2010_facts.html Accessed April 5, 2011.*

[4] *Written correspondence from Joseph Molles, LAPL Library Facilities Division, April 26, 2011.*

Table IV.J.4-2

Library Facilities Located in the Vicinity of the Project Site

Library	Distance from Project Site	Size	Service Population	Hours of Operation
West Los Angeles Regional Library 11360 Santa Monica Blvd.	2.5 miles	13,740 sf	39,147	12:30 P.M. to 8:00 P.M. Tue & Thur. 10:00 A.M. to 5:30 P.M. Wed & Fri. 10:00 A.M. to 5:30 P.M. Sat.
Westwood Branch Library 1246 Glendon Ave.	2.8 miles	12,500 sf	76,725	12:30 P.M. to 8:00 P.M. Tue & Thur 10:00 A.M. to 5:30 P.M. Wed & Fri 10:00 A.M. to 5:30 P.M. Sat
Robertson Branch Library 1719 S. Robertson Blvd.	2.9 miles	9,035 sf	51,559	12:30 P.M. to 8:00 P.M. Tue & Thur 10:00 A.M. to 5:30 P.M. Wed & Fri 1:00 P.M. to 5:00 P.M. Sun
Palms–Rancho Park Branch Library 2920 Overland Ave.	3.0 miles	10,500 sf	75,149	12:30 P.M. to 8:00 P.M. Tue & Thur 10:00 A.M. to 5:30 P.M. Wed & Fri 10:00 A.M. to 5:30 P.M. Sat
Beverly Hills Main Public Library 444 N. Rexford Dr.	1.2 miles	91,000 sf [a]	34,210 [b]	10:00 A.M. to 8:00 P.M. Mon–Wed 10:00 A.M. to 6:00 P.M. Thur–Sat 12:00 P.M. to 5:00 P.M. Sun

[a] City of Beverly Hills General Plan Update, Technical Background Report, October 2005.

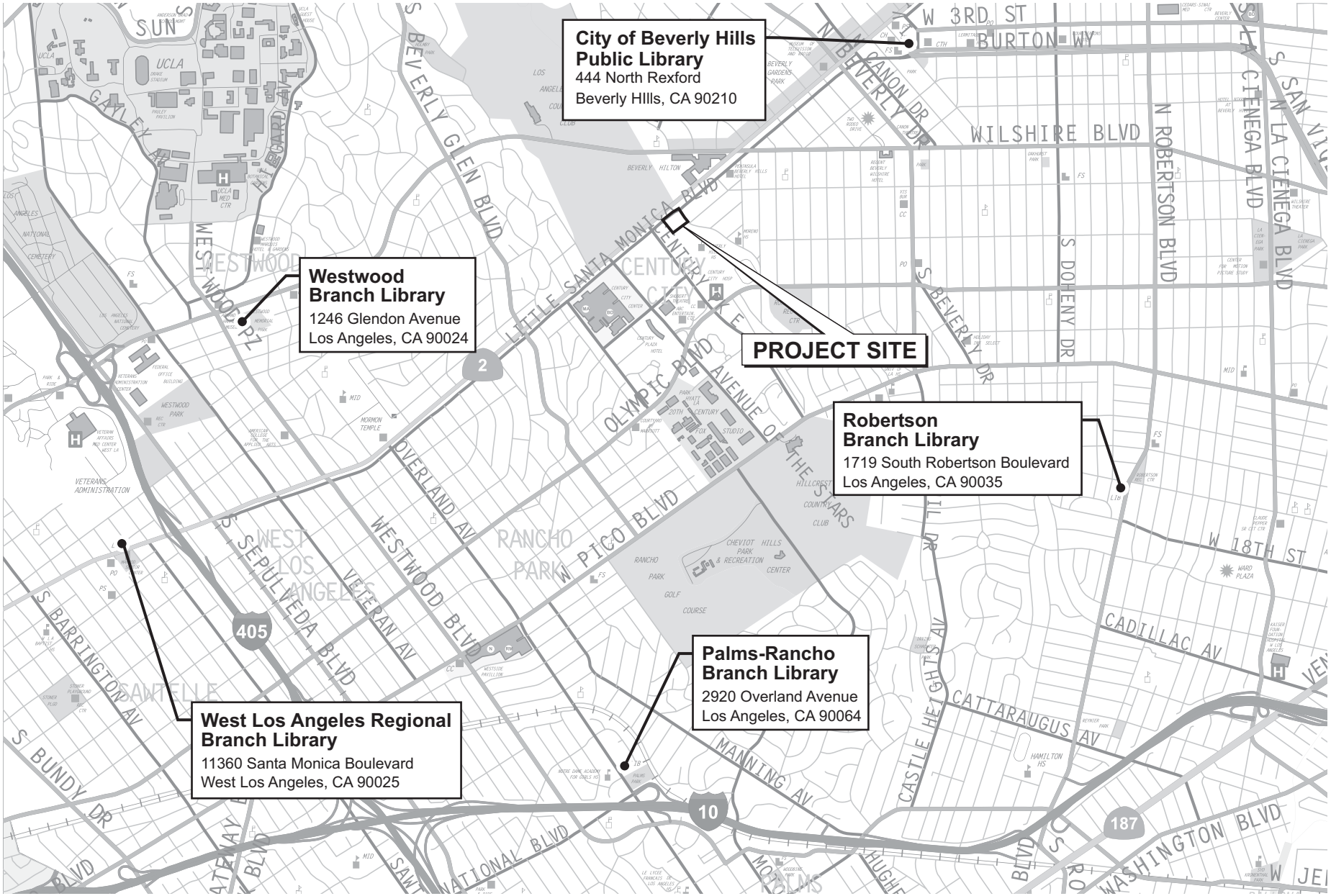
[b] California Department of Finance. Table E-5: Population and Housing Estimates for Cities, Counties, and the State, 2010-2011. Available at: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php. Accessed April 29, 2011.

Source: Los Angeles Public Library website, City of Beverly Hills website, and written correspondence from Joseph Molles, LAPL Library Facilities Division, April 26, 2011. Service populations are based on the most recent year (2010) of data availability.

The Palms-Rancho Park Branch Library at 2920 Overland Avenue is located approximately 3.0 miles south of the project site. This 10,500 square foot branch, which opened in November 2002, serves a current population of 75,149 people according to the LAPL. The library currently employs 10 full-time staff positions. The library includes 53,387 volumes and has an annual circulation of 252,557. With the exception of the West Los Angeles Branch Library, the LAPL facilities serving the project site do not meet the branch building size standards set forth in the 2007 Facilities Plan.

The City of Beverly Hills Public Library (BHPL) Main Library is also located near the project. The Main Library is located at 444 North Rexford Drive, approximately 1.2 miles northeast of the project site (refer to Figure IV.J-4). The City of Beverly Hills is served by two public libraries; the Beverly Hills Public Library, Main Library and the Roxbury Senior Library. The Main Library is a 91,000 square-foot facility. Given Beverly Hill's current (2011) population of 34,210 residents, the Main Library provides approximately 2.66 square feet of library space per resident.

Both the LAPL and BHPL are members of the Southern California Library Cooperative (SCLC). The SCLC is an association of 46 independent city and special district public libraries located in Los Angeles, Orange, and



PCR

Libraries Located in the Vicinity of the Project Site

10000 Santa Monica Boulevard
Source: PCR Services Corp., 2011

FIGURE
IV.J.4-1

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Ventura counties which have agreed to cooperate in providing library service to the residents of all participating jurisdictions. SCLC members extend, on an equal basis, loan privileges to residents of other member libraries. Additionally, an array of technical, arts, and general libraries are located on the UCLA campus approximately less than two miles from the project site.

3. PROJECT IMPACTS

a. Methodology

Potential project impacts on library services and facilities are determined based on identifying the primary service library or libraries that serve the project site, forecasting the number of residents generated by the project, identifying the population within the library's service area at the time of project buildout, combining the project's resident population with the forecasted service area population, and comparing the combined population to the service population for the library as determined by LAPL.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a screening question that addresses impacts with regard to library protection service. This question is as follows:

> *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

- Other public facilities (including libraries)?

In the context of this question from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide*, states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for library services anticipated at the time of project buildout compared to the expected level of service available. Consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and
- Whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to LAPL).

Based on these factors, the project would have a significant impact on library services if the project would generate a demand for library facilities or services, or would cause an increase in community population that would:

> **LIB-1** Cause the demand for library services to require new or physically altered library facilities to meet the needs of the proposed project.

c. Analysis of Project Impacts

According to 2010 census data, the residential population and the number of housing units in Century City represents a household size of approximately 1.34 persons per household.[5] Therefore, the proposed project's 283 dwelling units would generate approximately 379 new residents. As there is no community branch library for the Century City area, LAPL has identified the West Los Angeles Regional Branch Library, the Westwood Branch Library, the Robertson Branch Library, and the Palms-Rancho Park Branch Library as the libraries that would serve the project site. LAPL bases the anticipated service population for a branch on census tracts that are assigned to that branch. Based upon the City Planning Department's estimates, the annual growth factor for populations served by these libraries is approximately 0.7 percent.

The West Los Angeles Regional Branch Library is the City of Los Angeles library nearest the project site. As such, it is anticipated that project residents would utilize this library over other LAPL libraries due to convenience. As identified in Table IV.J.4-2, the West Los Angeles Regional Branch Library is currently adequately sized to accommodate the population residing in its service area. Specifically, at 13,740 square feet, the library is designed to accommodate a service population of at least 45,000 persons. With a current service area population of 39,147 persons, the current design could accommodate an additional 5,853 residents. As a result, the project's 379 net new residents would only comprise 6.5 percent of the additional resident population that could be accommodated by the West Los Angeles Regional Branch Library. This represents a nominal increase in the demand at the West Los Angeles Branch Library and the library's existing service level would be able to be maintained without an additional library or alterations to the existing library.

However, all project residents would not necessarily use the nearest library. Given the project's central location to the West Los Angeles Regional Branch Library, and the Westwood, Robertson, and Palms-Rancho Park Branch Libraries, the project's population could be expected to distribute their demand, thus lowering demand at any one location. According to the LAPL, the populations being served by these other facilities exceed the standards set forth in the 2007 Branch Facilities. Nonetheless, the use of these facilities by project residents is anticipated to be minimal as they would likely utilize the LAPL library nearest the project site, and use of other libraries would be distributed. Further, the 2007 Branch Facilities Plan states than an additional library facility should be considered only when the population served by a branch library exceeds 90,000 persons. Even on the remote chance that the entirety of the project's estimated 379 residents were to use the Westwood, Robertson, or Palms-Rancho Park Branch Libraries, the service populations of these facilities would not approach 90,000 residents. Furthermore, project residents would be eligible to use the array of technical, arts, and general libraries on the UCLA campus, which is located less than two miles from the project site. As a result, the proposed project would not exceed the population level required for new facilities.

The Beverly Hills Main Library, located approximately 1.2 miles from the project site, would also be available to serve residents of the proposed project. Given the proximity of the library to the project site, some project residents may also use this library. However, given the availability of other Los Angeles and regional libraries, e.g. the library facilities of UCLA the number of such library visitors would be negligible. Even if all project residents were to use the Beverly Hills Main Branch Library under the SCLC, the project's proposed

[5] *Century City makes up the entirety Census Tract 2679.01. According to the 2010 Census data, there were 2,428 residents and 1,812 housing units in Century City, for an average 1.34 persons per household.*

residents would result in only a negligible decrease in the floor-area-to-resident ratio at the library (e.g., 2.63 square feet per resident vs. 2.66 square feet per resident). Beverly Hills has not established capacity standards similar to those of Los Angeles. However, it may be noted that the 2.63 square feet of library space per person in Beverly Hills is substantially greater than the ratios associated with Los Angeles' capacity standards presented in Table IV.J-4.1, above. When considering a service area population up to 44,999 people, the Los Angeles service level equates to approximately 0.28 square feet per person (12,500 square foot library for up to 44,999 people). When considering a service population of between 45,000 and 90,000 people, the service level ranges from 0.32 square foot per person (14,500 square foot library for 45,000 people) to 0.16 square foot per person (14,500 square foot library for 90,000 people). In any case, Beverly Hills, like the City of Los Angeles is a member of the SCLC association of public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions. Participation in this program enables individuals to use their library cards in multiple jurisdictions, and allows for member libraries to receive compensation for such use.

It should also be noted that the project would generate revenue to the City's general fund that could be used for the provision of public services such as library facilities. Also, Los Angeles voters, recognizing the need to provide adequate library services, recently approved Measure L. Measure L increases library funding gradually to 0.03 percent to keep libraries open longer and to improve library services; thereby providing LAPL a mechanism to address the needs of additional population.

Thus, the project would result in a nominal increase in the demand at library facilities serving the site and the project would not increase demand at library facilities serving the project site to the extent that a new library facility or alterations to an existing facilities would be required to maintain existing service levels. Thus, since the increased demand generated by the project would be nominal, impacts on these library facilities would be less than significant.

4. CUMULATIVE IMPACTS

Section III., General Description of Environmental Setting, of this Draft EIR identifies 40 related projects that are anticipated to be developed within the vicinity of the project site. However, for purposes of this cumulative impact analysis on libraries, only those related projects that propose residential uses are considered as residential uses would generate users of library facilities. Residential related project are listed in **Table IV.J.4-3**, *Estimated Cumulative Impacts to Libraries*. Of the 40 related projects, 20 are residential projects generating a population of approximately 3,759 people. With the addition of the project's estimated population of 379 residents, the total new residents would be 4,138 residents.

To the extent that these residents would utilize only one of the area's library's, the cumulative residential growth would not be sufficient enough to result in the need for a new branch library at any of the libraries (i.e., the service area population would not exceed 90,000 residents at any of the area facilities). It is also important to note that residents would likely visit the library most convenient to them (including libraries available at the UCLA campus) and use would be spread across these various libraries so no one facility would be significantly impacted. In addition, this number may be overstated as it does not consider that much of the growth associated with the project and the related projects is already accounted for in the service population projections made by LAPL. Similar to the proposed project, related projects would generate revenue to the City's general fund that could be used to fund LAPL expenditures as necessary to

Table IV.J.4-3

Estimated Cumulative Impacts to Libraries

Map No.[a]	Project	Location	Residential Population[b, c, d]
City of Los Angeles			
3	Mixed-Use Development	10955 Wilshire Blvd	20
4	Mixed-Use Development	10857 Santa Monica Blvd	95
7	Mixed-Use Development	1130 Gayle Ave	97
8	Mixed-Use Development	1777 Westwood Blvd	91
9	Condominium	10777 Wilshire Blvd	121
12	Condominium	1929 Beloit Ave	127
14	Century City Westfield Expansion	10250 Santa Monica Blvd	351[e]
15	Mixed-Use Development	11122 Pico Blvd	1087
16	Mixed-Use Development	2025 Avenue of the Stars	279[e]
17	Condominium	10331 Bellwood Ave	319
City of Beverly Hills			
20	9900 Wilshire Blvd	9900 Wilshire Boulevard	524
22	The Beverly Hilton	9876 Wilshire Boulevard	250
23	Condominiums	9936 Durant Drive	27
26	Condominiums	450-460 North Palm Drive	73
27	Condominiums	432 N Oakhurst Drive	71
30	Condominiums	140-144 South Oakhurst Drive	23
32	Mixed-Use Development	9200 Wilshire Boulevard	112
35	Condominiums	225 S Hamilton Drive	27
36	Condominiums	156-168 North La Peer Drive	21
38	Mixed-Use Development	8600 Wilshire Boulevard	44
		Related Projects Total	**3,759**
		Proposed Project Total	**379**
		Grand Total	**4,138**

[a] *Corresponds with Map Nos. on Figure III-1 of this Draft EIR.*

[b] *Based on the most recent (2009) data in the West Los Angeles Community Plan, the Community Plan area has 76,933 persons residing in 38,155 dwelling units, averaging approximately 2.02 persons per household. City of Los Angeles Planning Department Statistical Information, http://cityplanning.lacity.org, accessed April 5, 2011.*

[c] *Based on the most recent (2011) California Department of Finance Data, the City of Beverly Hills has a residential population of 34,132 persons residing in 16,393 dwelling units, averaging 2.08 persons per household. California Department of Finance. Table E-5: Population Estimates with Annual Percent Change – January 1 2010 and 2011, http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php, accessed April 29, 2011.*

[d] *Totals are rounded to the nearest whole number.*

[e] *Based on the 2010 Census data, Century City (Census Tract 2679.01) has 2,428 residents residing in 1,812 housing units, an averaging 1.34 persons per household. http://factfinder2.census.gov, accessed April 29, 2011.*

Source: Fehr and Peers (related projects), and PCR Services Corporation (population calculations), July 2011.

offset the cumulative incremental impact on library services. Therefore, cumulative growth anticipated in the community, including the proposed project, would not cause a future population that would exceed the expected service population of libraries serving the project site.

5. MITIGATION MEASURES

Potential impacts to libraries would be less than significant. Therefore, no mitigation measures are required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Potential impacts to library services and facilities as a result of implementation of the proposed project would be less than significant and no mitigation measures would be required. The proposed project, in conjunction with related projects, would not result in a significant cumulative impact to library services and facilities; therefore, no mitigation measures are necessary.

IV. ENVIRONMENTAL IMPACT ANALYSIS
J. PUBLIC SERVICES
5. PARKS AND RECREATION

1. INTRODUCTION

This section analyzes the potential impacts of the proposed project on parks and recreational facilities. The project's provisions for park and recreational facilities and demand associated with residential occupants are evaluated in light of applicable City goals and regulatory requirements. Information regarding existing service ratios, as well as existing parks and recreational facilities surrounding the project site, was provided in part by the Los Angeles Department of Recreation and Parks (LADRP).

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) State Level

Section 66477 of the California Government Code, also known as the Quimby Act, was enacted by the California legislature in 1965 to promote the availability of park and open space areas in response to California's rapid urbanization and the need to preserve open space and provide parks and recreation facilities in response to this urbanization. The Quimby Act authorizes cities and counties to enact ordinances requiring the dedication of land, or the payment of fees for park and/or recreational facilities in lieu thereof, or both, by developers of residential subdivisions as a condition to the approval of a tentative map or parcel map. Under the Quimby Act, dedications of land shall not exceed three acres of parkland per 1,000 persons residing within a subdivision, and in-lieu fee payments shall not exceed the proportionate amount necessary to provide three acres of parkland, unless the amount of existing neighborhood and community parkland exceeds that limit. As the parkland standard is not exceeded in the West Los Angeles community plan area, the maximum exaction for the proposed project under the Quimby Act is three acres of parkland per 1,000 persons. Los Angeles Municipal Code (LAMC) Section 17.12 was authorized to support compliance with the Quimby Act. Compliance with the Quimby Act is discussed below as set forth in Section 17.12 of the LAMC.

(2) Local Level

The City of Los Angeles General Plan indicates that a park and recreation system should address standards in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreational facilities throughout the City; and (3) a full complement of park and recreational facility types (i.e., active and passive recreation for all age groups) to accommodate a wide variety of users. Facilities should be provided at the neighborhood, community, and regional levels.

Within the City's General Plan, the Public Recreation Plan (PRP) establishes policies and standards related to parks, recreational facilities, and open space areas in the City. The PRP provides Citywide goals, objectives, and recommendations concerning parks and recreational facilities. In addition to the standards established in the PRP, park and open space requirements pursuant to the Quimby Act are also set forth in Sections

12.21 and 17.12 of the LAMC. The following provides information regarding both the PRP and applicable LAMC standards and requirements.

(a) Public Recreation Plan

Adopted in 1980 by the Los Angeles City Council, the PRP focuses on the development of physical facilities by emphasizing the provision of neighborhood and community recreation sites, including community buildings, gymnasiums, swimming pools, and tennis courts.[31] To a larger extent, the PRP focuses on facility planning in residential areas, as these areas generate the greatest demand for parks and recreational facilities. The PRP also establishes general locations for future facilities based on a proposed service radii and projected population levels.

According to the standard park characteristics identified in the PRP, park facilities are discussed in terms of neighborhood parks and community parks. A neighborhood park is intended to provide space and facilities for outdoor and indoor recreation activities to serve the immediate neighborhood. Community parks are intended to serve several surrounding neighborhoods and are designed to serve a wider interest range than a neighborhood park.

Neighborhood parks typically include a lawn area, multi-purpose fields and/or courts (e.g., softball, soccer, basketball, and volleyball), playground apparatus, picnic areas, off-street parking, and a maintenance area. Although the ideal size for a neighborhood park is considered to be ten acres, such parks within the City of Los Angeles are typically one to five acres in size. Community Parks often include such facilities as a community building, multi-purpose fields, hard court areas, parking, maintenance service areas, and play areas. In addition to those facilities provided at a neighborhood park, community parks may also include baseball diamonds, football and soccer fields, tennis and handball courts, a swimming pool, and/or specialized facilities to meet the needs of the community. According to the PRP the ideal size for a community park is considered to be 15 to 20 acres.

The PRP also states that the allocation of acreage for neighborhood and community parks and recreational facilities should be based on the resident population within a park's service radius. The desired long-range standard for parks is two acres of neighborhood parkland per 1,000 residents and two acres of community parkland per 1,000 residents, for a combined total of four acres of parkland per 1,000 residents. Ideally, these service ratios would be reached within a half-mile service radius of a neighborhood park and within a one-mile service radius of a community park. However, the PRP also notes that these long-range standards may not be reached during the life of the PRP, and therefore, includes more attainable short- and intermediate-range standards of one acre of neighborhood parkland per 1,000 residents and one acre of community parkland per 1,000 residents, for a combined total of two acres of parkland per 1,000 residents, Under the short-term goals, these service ratios would be met within a one-mile service radius for neighborhood parks and within a two-mile service radius for community parks. The LADRP commonly uses the geographic area covered by the Community Plan rather than the park service radius to determine service ratios. The PRP also establishes that no park or recreational facility shall be diminished in size or removed from any service radius unless the required acreage is replaced elsewhere within that same service radius, or the need is diminished due to population and/or land use changes.

[31] *City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan. Approved October 9, 1980.*

(b) Los Angeles Municipal Code

Section 12.21.G of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. Section 12.21 of the LAMC also identifies what areas of a project would qualify as usable open space for the purposes of meeting the project's open space requirements. Usable open space is defined as areas designated for active or passive recreation and may consist of private and/or common areas. Common open space areas must be readily accessible to all residents of the site and constitute at least 50 percent of the total required usable open space. Common open space areas can incorporate recreational amenities such as swimming pools, spas, children's play areas, and sitting areas. A minimum of 25 percent of the outdoor common open space area must be planted with ground cover, shrubs, or trees. In addition, indoor recreation amenities cannot constitute more than 25 percent of the total required usable open space. Private open space is an area which is contiguous to and immediately accessible from an individual dwelling unit, may have a dimension no less than six feet in any direction and must contain a minimum of 50 square feet, of which no more than 50 square feet per dwelling unit can be counted towards the total required usable open space.

Section 17.12 of the LAMC, authorized under the Quimby Act, which requires developers to set aside land, donate conservation elements, or pay fees for park improvements, provides standards for parkland acreage requirements and identifies fees per dwelling unit. The area of land within a subdivision that is required to be dedicated for park and recreational uses is determined by the maximum residential density permitted by the zone within which the site is located. The project site is located within the C2 zone, which allows residential development pursuant to the standards established for the R4 zone. The project proposes 283 residential units. Therefore, based on the provisions set forth in LAMC Section 17.12, and, in the absence of any in-lieu fees or credits for private recreational areas, 32 percent of the gross subdivision area would be required to be dedicated as parkland since the project would result in more than 100 dwelling units per acre.

Section 17.12.F of the LAMC allows private recreational areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication and/or in lieu fee requirement. Recreational areas that qualify under this provision of Section 17.12 include, in part, swimming pools and spas (when the spas are an integral part of a pool complex). Furthermore, in accordance with LAMC Section 17.12.F.1, the recreational areas proposed as part of a project must meet the following standards in order to be credited against the requirement for land dedication: (1) each facility is available for use by all of the residents of a project; and (2) the area and the facilities satisfy the park and recreation needs of a project so as to reduce that project's need for public recreation and park facilities.

b. Existing Conditions

The LADRP is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City of Los Angeles. Currently, the LADRP maintains over 15,000 acres of parkland with 400 neighborhood and regional parks (including Griffith Park, one of the largest municipal parks within the boundaries of an American city), 11 lakes, more than 180 recreation and community centers, two beaches plus the Venice Beach Ocean Front Walk, 26 licensed child care facilities, 13 golf courses, seven skate parks,

seven museums, and an urban forest of one million trees.[32] The project site is located within the LADRP Pacific Region.

The City of Los Angeles has an estimated Citywide ratio of 0.70 acre of neighborhood and community parkland per 1,000 residents.[33] More specifically, the West Los Angeles Community Plan area, which includes Century City, has an estimated community ratio of 0.77 acre of neighborhood and community parkland per 1,000 residents.[34] These ratios do not meet the City's short- and intermediate-range neighborhood and community parkland standards under the PRP of one acre per 1,000 persons within a one-mile service radius for neighborhood parks, and one acre per 1,000 persons within a two-mile radius for community parks. According to the LADRP, the project site is located in a heavily populated area in which high numbers of youth, families, and seniors utilize local parks and recreational facilities. The LADRP has identified Holmby Park as the neighborhood park that would serve the project site, and Cheviot Hills Park and Westwood Park as the two community parks that would serve the project site.[35]

Beverly Hills is located to the immediate south and east of the project site. The City of Beverly Hills Recreation and Parks Department (BHRPD) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City of Beverly Hills. The BHRPD parks system consists of 76.7 acres of developed parkland in 13 parks, including seven mini parks and six major parks. The BHRPD also operates two community centers.[36] Given the City's current population of 34,132 people,[37] the Beverly Hills parkland-to-population ratio is approximately 2.24 acres of parkland per 1,000 residents. This ratio does not account for a joint powers agreement the City has with the Beverly Hills Unified School District (BHUSD) that provides for after school hour public access to the BHUSD's numerous facilities, including fields, courts, auditoriums, and parking facilities. The City of Beverly Hills uses as a standard of 2.5 acres of neighborhood parkland per 1,000 residents and 2.5 acres of district or community parkland per 1,000 residents. However, the General Plan Open Space Element notes the large quantity of private recreation facilities available and considers that standard to be unrealistic.[38] As shown below, the park nearest the project site is Beverly Hills' Roxbury Park. In May 2008, Beverly Hills approved the Roxbury Master Plan, which outlines improvements for Roxbury Park which includes a new 22,600 square foot facility, a renovated picnic area, a sand volleyball court, outdoor basketball court, and 4 lighted tennis courts, as well as other improvements. No timeline has been established for the completion of these improvements.

Table IV.J.5-1, *Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site,* lists these three facilities, as well as the parks and recreational facilities located within three miles of the project site that would likely help serve residents of the project. **Figure IV.J.5-1**, *Parks and Recreational Facilities Located in the Vicinity of the Project Site,* depicts the location of these facilities in relation to the project site.

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[32] *LADRP, A Message from the General Manager http://www.ci.la.ca.us/RAP/dept.htm, accessed April 4, 2011.*

[33] *Written correspondence from Michael A. Shull, Superintendant, LADRP. Received April 15, 2011.*

[34] *Ibid.*

[35] *Written correspondence from Michael A. Shull, Superintendant, LADRP. Received April 15, 2011.*

[36] *City of Beverly Hills General Plan Update Technical Background Report, Chapter 4.2: Recreation and Parks. October 2005. Available at: http://www.beverlyhills.org/civica/filebank/blobdload.asp?BlobID=2575*

[37] *California Department of Finance. Table E-5: Population and Housing Estimates for Cities, Counties, and the State, 2010-2011. Available at: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php. Accessed April 29, 2011.*

[38] *The Beverly Hills Hilton Revitalization Plan, Draft EIR, August 2007.*

Table IV.J.5-1

Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site

Map No.[a]	Name and Address	Distance From Project Site	Type of Park	Size	Amenities
City of Los Angeles					
1	Holmby Park & Armand Hammer Pitch & Putt Golf Course [b] 601 Club View Dr.	0.9 mile	Neighborhood	8.52 acres	Barbeque pits, children's play area, picnic tables, the 18-hole Armand Hammer golf course, bowling greens, jogging path, and a waterfall
2	Cheviot Hills Park & Recreation Center [b] 2511 Motor Ave.	1.6 miles	Community	40 acres	Auditorium, barbecue pits, lighted and unlighted sports fields, lighted indoor and outdoor basketball courts, a children's play area, a community room (capacity of 80 to 100 persons), an indoor gym, picnic area, indoor volleyball courts, an archery range, petanque courts, tennis courts, and an amphitheater. This park also includes the Rancho Park Golf Course, described immediately below
3	Rancho Park Golf Course [c] 10460 West Pico Blvd.	1.6 miles	Regional	144.34 acres	9-hole, par 3 public golf course, double deck driving range, and a full size 18-hole golf course
4	Westwood Park & Recreation Center [b] 1350 South Sepulveda Blvd.	1.8 miles	Community	26.70 acres	Barbeque pits, lighted baseball diamond, indoor and outdoor basketball courts, children's play area, community room, indoor gym (without weights), picnic tables, and a boundless playground for wheelchair bound visitors
5	Irving Schachter Park 2599 Beverwil Dr.	2.3 miles	Small	0.75 acre	Does not offer any specialized recreational facilities
6	Westwood Gardens Park 1246 Glendon Ave.	2.4 miles	Small	0.29 acre	Not listed

Table IV.J.5-1 (Continued)

Existing Parks and Recreational Facilities Located in the Vicinity of the Project Site

Map No.[a]	Name and Address	Distance From Project Site	Type of Park	Size	Amenities
7	Robertson Recreation Center 1641 Preuss Rd.	2.4 miles	Neighborhood	1.21 acres	Lighted outdoor basketball courts, lighted handball courts, children's play area, community room, indoor gym (without weights), and picnic tables
8	De Neve Square Park 314 Beverly Glen Blvd.	2.8 miles	Neighborhood	2.0 acres	Not listed
City of Beverly Hills					
9	Beverly Gardens Park Along Santa Monica and Wilshire Blvds.	0.5 mile	Community	1.9 linear miles	Jogging path and walking paths, various gardens, arbors, and fountains
10	Roxbury Park 471 South Roxbury Dr.	0.8 mile	Community	Not listed	Lighted tennis courts, baseball diamond/soccer field, basketball courts, sand volleyball courts, lawn bowling, croquet, putting green, picnic tables, and children's play area
11	Will Rogers Memorial Park 9650 Sunset Blvd.	1.8 miles	Neighborhood	Not listed	Fountains, walkways, and restrooms

[a] *Corresponds with Map Nos. on Figure IV.J.5-1.*
[b] *These facilities were identified by the LADRP as directly serving the project site.*
[c] *Golf courses do not meet the definition of a neighborhood or community park established in the PRP and are not included in the overall park total acreage.*

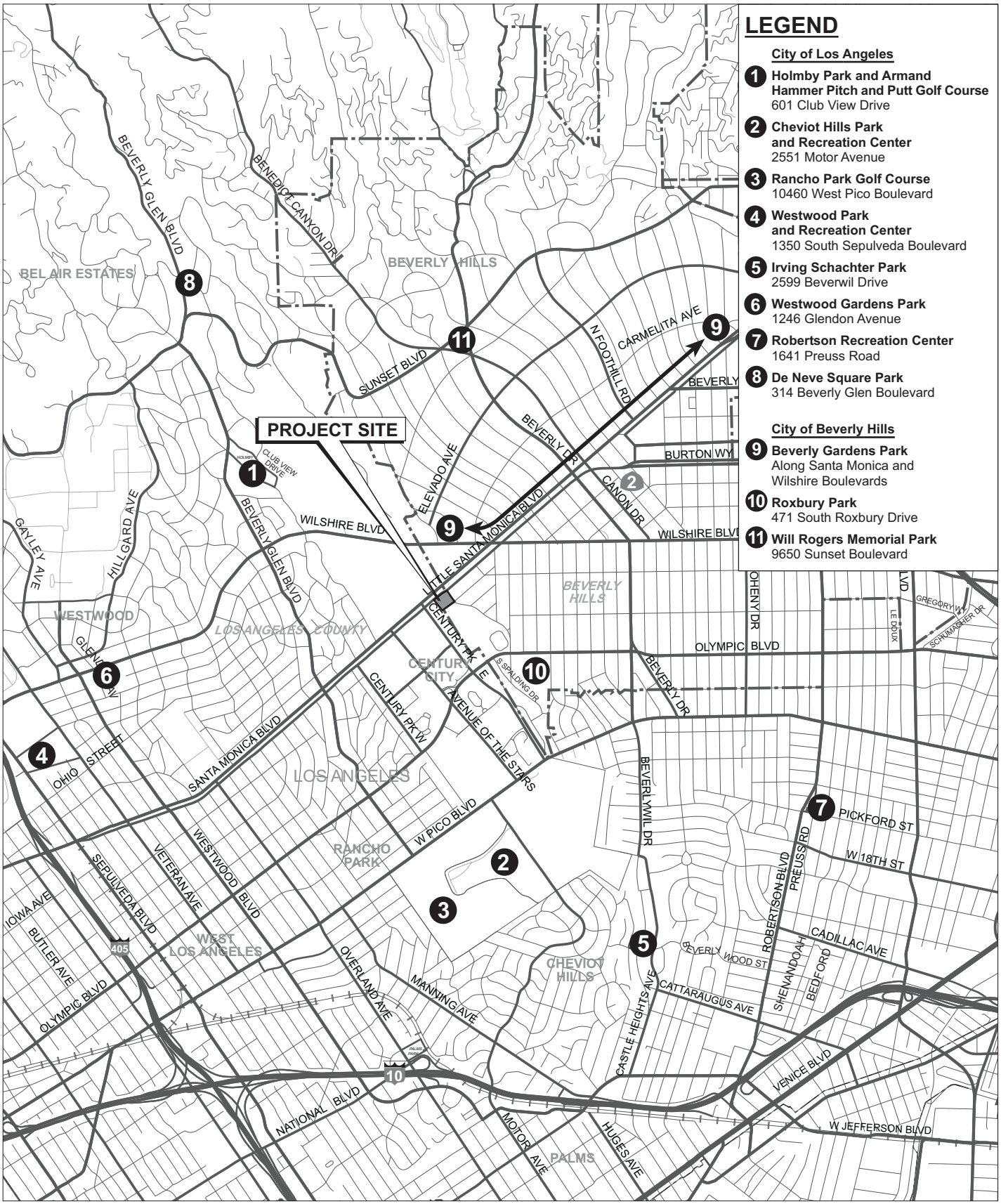
Source: LADRP. PCR Services Corporation, April 2011.

As noted in Table IV.J.5-1 and Figure IV.J.5-1, some of these parks and recreational facilities are located in the City of Beverly Hills.

3. PROJECT IMPACTS

a. Methodology

The analysis of parks and recreation impacts is based on comparing the park and open space ratio associated with the project to the standards set forth by the Quimby Act, the PRP, and the LAMC. To be consistent with the standards set forth in the aforementioned regulatory guidance documents, the analysis of impacts is based on the acreage of open space available per the project's estimated residential population.



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Parks and Recreational Facilities in the Vicinity of the Project

10000 Santa Monica Boulevard

Source: PCR Services Corporation, 2011.

FIGURE

IV.J.5-1

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b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a screening question that addresses impacts with regard to police protection service. This question is as follows:

> Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which would cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
>
> - Parks?

In the context of this question from Appendix G of the CEQA Guidelines, the *City of Los Angeles CEQA Thresholds Guide*, states that the determination of significance shall be made on a case-by-case basis, considering the following factors:

- The net population increase resulting from the proposed project;
- The demand for recreation and park services anticipated at the time of project build-out compared to the expected level of service available. Consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and
- Whether the project includes features that would reduce the demand for recreation and park services (e.g., on-site recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

Based on these factors, the *City of Los Angeles CEQA Thresholds Guide* states that a project would normally have a significant impact on parks and recreation if:

> **PRK-1** The project requires the addition of a new park or recreation area; or the expansion, consolidation or relocation of an existing facility to maintain service.

c. Project Design Features

The proposed project would provide residents with common open space (including indoor recreational amenities) and private open space. Specifically, the proposed project would provide 82,052 square feet (1.88 acres) of common open space via approximately 43,141 square feet (0.99 acre) of ground-level landscaped open space, approximately 27,579 square feet (0.63 acre) of outdoor landscaped recreational area on a roof deck on top of the ancillary building, and approximately 11,332 square feet (0.26 acre) of indoor recreation facilities in the ancillary building. The approximately 43,141 square feet of ground-level landscaping would comprise approximately 41 percent of the project site. Recreation facilities located in the ancillary building would include a large indoor lap pool and a landscaped roof deck with outdoor pool, sundeck, hot tub and tennis court facility, and indoor fitness/gym facilities. The project would also provide 30,300 square feet (0.70 acre) of private open space in the form of terraces (i.e., balconies). Thus, the project would provide a total of 112,352 square feet (2.32 acres) of common and private open space (112,746 square feet with the automated parking system).

In addition, the project would implement a landscape plan that would complement and enhance the character of the project site as part of the proposed project. The landscape plan would support the concepts presented in the 2007 Greening of Century City Pedestrian Connectivity Plan, by enhancing the quality of the public thoroughfares and providing an appearance that is consistent with the overall landscaping concept for Century City. Mature trees, shrubs, and groundcover would be provided throughout the site. The Santa Monica Boulevard frontage would transition at the corner of Santa Monica Boulevard and Moreno Drive into a larger expanse of open space that would tie into the Moreno Drive frontage with mature specimen trees and dense planting to extend an overall garden feel from the project site out to the street. **Table IV.J.5-2**, *Summary of Proposed Project Open Space and Recreational Amenities,* summarizes the proposed project's open space and recreational amenities.

Table IV.J.5-2

Summary of Proposed Project Open Space and Recreational Amenities

Amenity	Square Feet
Ancillary Building – Recreational Facilities (common)	11,332 square feet
Outdoor Open Space (common and private)	
Garden and perimeter (common)	43,141 square feet
Roof Deck (common)	27,579 square feet
Terraces (private)	30,300 square feet
Open Space Total	**112,352 square feet**

Source: Handel Architects; Melendrez.

d. Analysis of Project Impacts

The proposed project includes two parking options; a Conventional Parking Option and an Automated Parking Option. The Automated Parking Option allows for a minor increase in the amount of open space provided by the project (394 square feet), which would be added as a private terrace. Consequently, the Automated Parking Option would provide 112,746 square feet of open space (compared to 112,352 square feet of open space provided under the Conventional Parking Option). Although the difference in open space between the options is negligible, to provide a conservative analysis the project's potential impact under the Conventional Parking System is assessed.

(1) Public Recreation Plan

The PRP's desired long-range Citywide standard is two acres of neighborhood parkland per 1,000 persons and two acres of community parkland per 1,000 residents, for a combined total of four acres of parkland per 1,000 residents. However, as discussed above, the PRP also notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short and intermediate-range standards of one acre of neighborhood parkland per 1,000 persons and one acre of community parkland per 1,000 residents, for a combined total of two acres per 1,000 residents. Additionally, the State's Quimby Act allows a local jurisdiction to require a subdivision to provide a maximum of three acres per 1,000 persons in land dedication or fees, unless that particular jurisdiction is already exceeding that ratio.

According to 2010 census data, the residential population and the number of housing units in Century City represents a household size of approximately 1.34 persons per household.[39] Therefore, the proposed project's 283 dwelling units would generate approximately 379 new residents.

Without the provision of on-site open space, the project's 379 residents would require 1.516 acres of parkland (0.758 acres of neighborhood and community parkland respectively) to meet the PRPs long range standard of 4 acres per 1,000 people and 0.758 acres (0.379 acres of neighborhood and community parkland respectively) to meet the PRP's more attainable short and intermediate-range standard of 2 acres per 1,000 people.

To meet the project residents' need for park and recreation activities, the project would provide approximately 82,052 square feet (1.88 acres) of common open space and recreation area. This translates to a parkland-to-population ratio of 4.96 acres per 1,000 residents, thus exceeding both the long range and more attainable short and intermediate-range standards of 4.0 acres and 2.0 acres, respectively.[40] The 82,052 square feet (1.88 acres) consists of approximately 70,720 square feet (1.62 acres) of common outdoor open space (ground-level open space and roof deck) and approximately 11,332 square feet (0.26 acre) of common indoor recreation area in the ancillary building. The common open space and recreation area would include landscaped garden and seating areas, a large indoor lap pool and a landscaped roof deck with outdoor pool, sundeck, hot tub and tennis court facility, and indoor fitness/gym facilities. Thus, the project's common open space area would be considered "neighborhood park" space, as it would serve the residents of the proposed development (i.e., the "immediate neighbors") and includes features similar to those of a neighborhood park.

Also, it should be noted that this level of open space and recreation service is substantially greater than the existing service levels of 0.70 acres of neighborhood and community parkland per 1,000 residents City wide, and 0.77 acres of neighborhood and community parkland per 1,000 residents in the West Los Angeles Community Plan area. The project's parkland-to-population ratio would also exceed the current Beverly Hills ratio of 2.24 acres of parkland per 1,000 residents.

It is anticipated that residents would prefer the use of on-site facilities over public parks facilities primarily due to convenience and proximity. In this way, the project's provision of on-site open space and recreation facilities would reduce the use of area parks by project residents. Nonetheless, some project residents would still be expected to utilize nearby park amenities such as picnic areas, sports fields, and basketball courts. As a result, the proposed project could result in a small incremental increase in the use of area public parks.

However, given the fact that the proposed project would include 82,052 square feet (1.88 acres) of common open space and indoor recreational amenities (essentially providing its residents with an on-site "neighborhood park"), park use within both Los Angeles and Beverly Hills by project residents would be negligible and would not require the provision of additional facilities or alterations to existing facilities to maintain existing service ratios. Specifically, even in the conservative scenario that all project residents utilized area parks, the demand would not be enough to notably affect parkland-to-population ratios in

[39] *Century City makes up the entirety Census Tract 2679.01. According to the 2010 Census data, there were 2,428 residents and 1,812 housing units in Century City, for an average 1.34 persons per household.*

[40] *1.88 acres of common open space ÷ 379 projected residents = 4.96 acres per 1,000 residents*

either the West Los Angeles Community Plan area or the City of Beverly Hills. Due to the limited number of residents generated by the project and the provision of on-site common open space equivalent to a neighborhood park to accommodate these residents, the project's contribution to increased demand at area parks would be negligible. Therefore, impacts on parks and recreational services would be negligible and less than significant and would not require the addition of a new park or recreation area; or the expansion, consolidation or relocation of an existing facility to maintain service.

(2) Los Angeles Municipal Code

Pursuant to Section 12.21 of the LAMC, the proposed project would be required to provide a minimum of 175 square feet of usable open space area per dwelling unit.[41] This amounts to 49,525 square feet (1.14 acres) of usable open space area based on the 283 units proposed. Of this amount, at least 50 percent (24,763 square feet or 0.57 acre) must be common open space area. Of the 49,525 square feet (1.14 acres) of common open space area required, a minimum of 25 percent (12,381 square feet or 0.28 acre) must be planted with ground cover, shrubs, or trees.

As discussed above, the proposed project would provide 82,052 square feet (1.88 acres) of common open space area via 43,141 square feet (0.99 acre) of ground-level landscaped open space, 27,579 square feet (0.63 acre) of landscaped recreation deck on top of the ancillary building, and 11,332 square feet (0.26 acre) of indoor recreation area in the ancillary building. The project would also provide 30,300 square feet (0.70 acre) of private open space in the form of terraces, for a total of 112,352 square feet (2.32 acres) of common and private open space. Therefore, the proposed project would exceed the required 49,525 square feet (1.14 acres) of usable open space area by 69,354 square feet (1.59 acres). Common open space provided by the project exceeds the required 24,763 square feet (0.57 acre) by 57,289 square feet (1.32 acres). With approximately 31,736 square feet of planted area, approximately 45% of the outdoor common open space would be planted. That exceeds the requirement that 25% of outdoor common open space be planted. Therefore, as demonstrated in this paragraph, the proposed project would exceed the open space requirements set forth in LAMC Section 12.21.

Section 17.12 of the LAMC, the City's parkland dedication ordinance enacted under the Quimby Act, provides a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. The area of land required for park and recreation dedication is based upon the maximum residential density permitted within the zone where it is located. As previously discussed, the project site is located within the C2 zone, which allows residential development pursuant to the standards established for the R4 zone. Therefore, the project site is permitted to be developed to a maximum density of over 100 dwelling units per acre. Thus, based on the provisions set forth in LAMC Section 17.12, 32 percent of the gross subdivision area would be required to be dedicated to the City of Los Angeles for park or recreational purposes. In the case of the proposed project, this would equate to a land dedication of 0.77 acre (32 percent of 2.4 acres). As mentioned above, Section 17.12.F of the LAMC allows private recreational areas developed within a project site for use by the particular project's residents to be credited against the project's land dedication and/or in lieu fee requirement. As discussed under Project Design Features above, the project proposes to include 82,052 square feet (1.88 acre) of common open space and indoor recreational amenities. Implementation of the mitigation measure below would ensure that through the provision of on-site recreational amenities and open space areas as a credit against the dedication of open space, payment of in-

[41] *To present a conservative analysis, each of the units is assumed to have more than three habitable rooms.*

lieu fees, dedication of parkland, or a combination of these methods, the project would comply with the maximum requirements established under the Quimby Act. With this mitigation measure, impacts on parks and recreational facilities would be less than significant.

4. CUMULATIVE IMPACTS

Section III of this Draft EIR identifies 40 related projects located within the City of Los Angeles and Beverly Hills that are anticipated to be developed within the vicinity of the project site. For purposes of this cumulative analysis on parks and recreation, only those related projects that propose residential uses are considered as residential uses would generate users of park facilities and services. Of the 40 related projects identified in Section III, the 20 residential projects are included in this cumulative analysis as listed in **Table IV.J.5-3**, *Estimated Cumulative Impacts to Parks and Recreational Facilities.* These related projects would cumulatively generate, in conjunction with the proposed project, the need for additional parks and recreational facilities. Similar to the proposed project, the residential population was determined by multiplying the number of residential units by the average household size as indicated by the population data. As shown in Table IV.J.5-3, related projects could potentially generate approximately 3,759 residents. The proposed project in conjunction with related projects could therefore generate approximately 4,138 residents. However, all related projects with residential uses would be required to comply with the requirements of the Quimby Act, the PRP, and LAMC Sections 12.21 and 17.12. As such, potential cumulative impacts to parks and recreational facilities would be reduced to a less than significant level.

5. MITIGATION MEASURES

Mitigation Measure J.5-1: In the event that the project's amenities do not provide sufficient credit against the project's land dedication and/or in lieu fee requirement, the Applicant shall do one or more of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Potential significant impacts to park and recreational facilities associated with the proposed project would be reduced to a level that is less than significant via compliance with Mitigation Measure J.5-1.

Table IV.J.5-3

Estimated Cumulative Impacts to Parks and Recreational Facilities

Map No.[a]	Project	Location	Residential Population[b, c, d]
3	Mixed-Use Development	10955 Wilshire Blvd	20
4	Mixed-Use Development	10857 Santa Monica Blvd	95
7	Mixed-Use Development	1130 Gayle Ave	97
8	Mixed-Use Development	1777 Westwood Blvd	91
9	Condominium	10777 Wilshire Blvd	121
12	Condominium	1929 Beloit Ave	127
14	Century City Westfield Expansion	10250 Santa Monica Blvd	351[e]
15	Mixed-Use Development	11122 Pico Blvd	1087
16	Mixed-Use Development	2025 Avenue of the Stars	279[e]
17	Condominium	10331 Bellwood Ave	319
20	9900 Wilshire Blvd	9900 Wilshire Boulevard	524
22	The Beverly Hilton	9876 Wilshire Boulevard	250
23	Condominiums	9936 Durant Drive	27
26	Condominiums	450-460 North Palm Drive	73
27	Condominiums	432 N Oakhurst Drive	71
30	Condominiums	140-144 South Oakhurst Drive	23
32	Mixed-Use Development	9200 Wilshire Boulevard	112
35	Condominiums	225 S Hamilton Drive	27
36	Condominiums	156-168 North La Peer Drive	21
38	Mixed-Use Development	8600 Wilshire Boulevard	44
		Related Projects Total	**3,759**
		Proposed Project Total	**379**
		Grand Total	**4,138**

[a] *Corresponds with Map Nos. on Figure III-1 of this Draft EIR.*

[b] *Based on the most recent (2009) data in the West Los Angeles Community Plan, the Community Plan area has 76,933 persons residing in 38,155 dwelling units, averaging approximately 2.02 persons per household. City of Los Angeles Planning Department Statistical Information, http://cityplanning.lacity.org, accessed April 5, 2011.*

[c] *Based on the most recent (2011) California Department of Finance Data, the City of Beverly Hills has a residential population of 34,132 persons residing in 16,393 dwelling units, averaging 2.08 persons per household. California Department of Finance. Table E-5: Population Estimates with Annual Percent Change – January 1 2010 and 2011, http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php, accessed April 29, 2011.*

[d] *Totals are rounded to the nearest whole number.*

[e] *Based on the 2010 Census data, Century City (Census Tract 2679.01) has 2,428 residents residing in 1,812 housing units, an averaging 1.34 persons per household. http://factfinder2.census.gov, accessed April 29, 2011.*

Source: Fehr and Peers (related projects), and PCR Services Corporation (population calculations), July 2011.

IV. ENVIRONMENTAL IMPACT ANALYSIS
K. TRANSPORTATION AND CIRCULATION

1. INTRODUCTION

This section analyzes potential impacts associated with construction traffic; and operational impacts on the following facilities: roadway intersections, neighborhood street segments, the regional transportation system, public transit, parking, access, and pedestrian/bicycle safety. It also addresses project consistency with transportation plans. Information for this analysis is based on a Traffic Study, prepared by Fehr & Peers.[1] The Los Angeles Department of Transportation (LADOT) and the Los Angeles Department of City Planning reviewed the Traffic Study prior to circulation of this Draft EIR. The Traffic Study is included as Appendix H of this Draft EIR.

2. ENVIRONMENTAL SETTING

a. Existing Conditions

The project site is located in the highly urbanized Century City area within the City of Los Angeles. In general, the majority of streets within the study area are under the jurisdiction of the City of Los Angeles. Some of the streets in the study area fall within the City of Beverly Hills' jurisdiction. Freeways are under the jurisdiction of the California Department of Transportation (Caltrans).[2] The freeways and streets in the study area are classified as follows:

- Freeways are high-volume/high-speed roadways with limited access occurring only at grade-separated interchanges.
- Class II major highways are generally defined as having four full-time through lanes and two part-time parking lanes with a median or left-turn lane.
- Secondary facilities are generally two- to four-lane roadways that supplement the major highways. These roadways are designed to carry some level of traffic while also providing some level of access to adjacent properties.
- Collector streets complement the previously listed facilities by providing connections between local streets and secondary or highway facilities.
- Local streets are intended for low traffic levels generated by trips with either a destination or a starting point on that local street. Local streets connect to collector streets, which, in turn, connect to the greater street network.

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1 *Transportation Analysis Report, 10000 Santa Monica Boulevard, prepared by Fehr & Peers, August 2011.*

2 *The study area selected for analysis extends to the I-405 freeway to the west (approximately 2.5 miles from project site), Pico Boulevard to the south (approximately one mile from the project site), Beverly Drive to the east (approximately one mile from the project site), and Santa Monica Boulevard to the North (adjacent to the project site).*

As described in further detail below, the study area is well served by a vast network of freeways and streets.[3] The main roadways serving the project site, as well as the intersections that were selected for analysis are shown in **Figure IV.K-1**, *Location of Analyzed Intersections.*

(1) Freeway System

Regional access to and from the project area is provided by the San Diego Freeway, approximately 2.25 miles west of the project site, and the Santa Monica Freeway, approximately 2.5 miles south of the project site.

The San Diego Freeway (I-405) runs in a north-south direction west of the project site and extends from the north San Fernando Valley to Orange County. In the vicinity of the project area study area, I-405 provides five lanes in each direction plus a southbound high occupancy vehicle, or carpool, lane. Interchanges are provided at Wilshire Boulevard, Santa Monica Boulevard, and Pico Boulevard/Olympic Boulevard in the study area.

The Santa Monica Freeway (I-10) runs in an east-west direction and extends from the Pacific Ocean eastward through downtown Los Angeles and beyond. In the vicinity of the study area, the freeway provides four to five lanes in each direction plus auxiliary lanes. Interchanges closest to the project site are at Overland Avenue and National Boulevard.

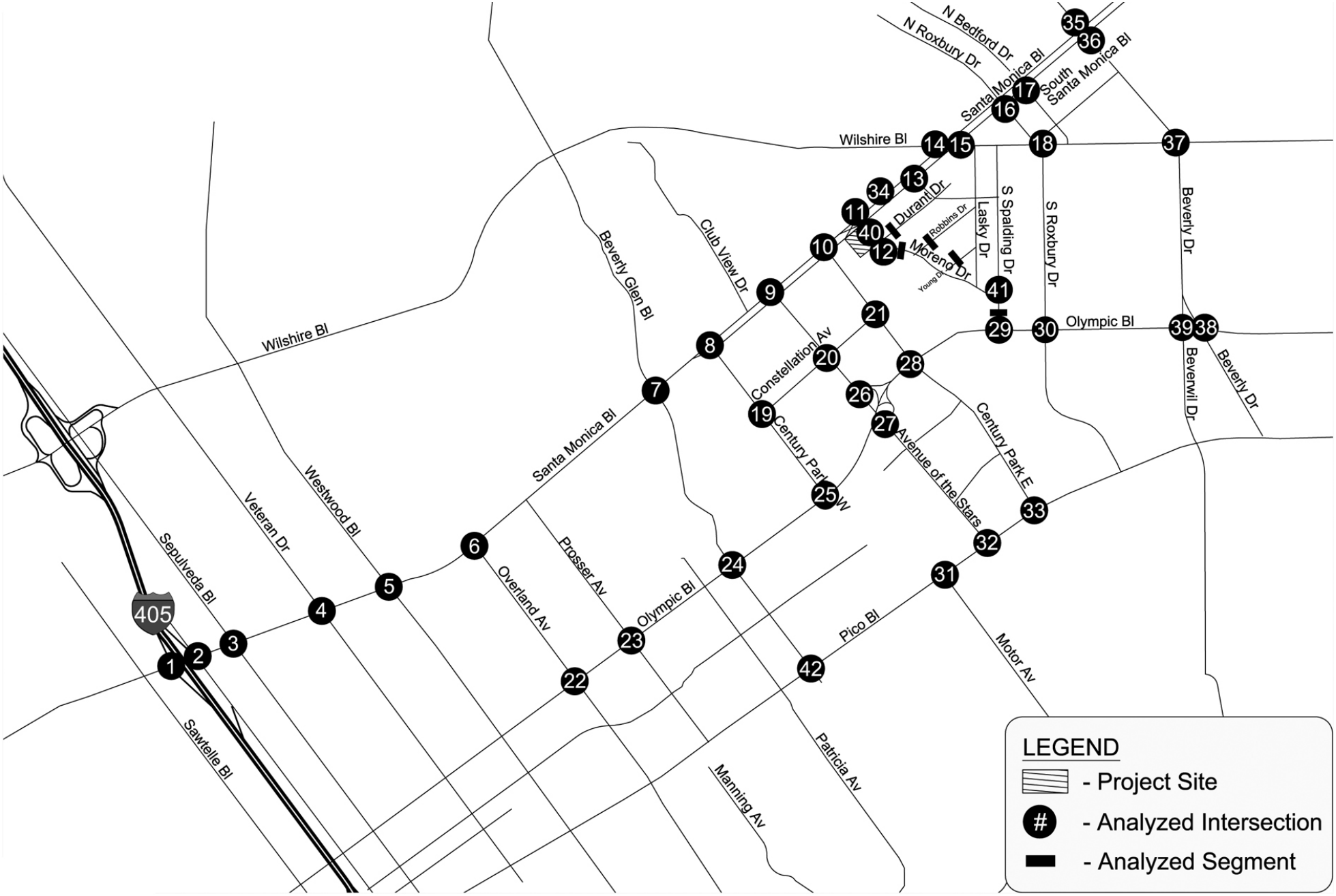
(2) Local Street System

The project site is served by a grid of arterial streets. Local access to the study area is provided by major arterial streets including Santa Monica, Wilshire, Olympic and Pico Boulevards, which provide east-west access throughout the region, and Beverly Drive, Beverly Glen Boulevard and Sepulveda Boulevard, which provide north-south access throughout the region.

(a) East-West Streets

Santa Monica Boulevard - Santa Monica Boulevard, which runs along the north edge of the project site, is a Class II major highway in the study area. The Santa Monica Boulevard Transit Parkway Project, completed in 2007, comprises the 2.5-mile segment of Santa Monica Boulevard between the I-405 and the Beverly Hills boundary. The Transit Parkway Project provides neighborhood access roads on the north and south sides of the main road, new street lighting and traffic signal system, a landscaped median, bicycle lanes and bus priority features. Santa Monica Boulevard east of the project site in the City of Beverly Hills is divided into two separate roadways: North Santa Monica Boulevard and South Santa Monica Boulevard. In the study area, each of these streets provides two through lanes in each direction and left-turn channelization at most intersections. Metered parking is present along portions of South Santa Monica Boulevard while parking is prohibited (Santa Monica Transit Parkway segment) is a single roadway providing as few as three and as many as four through lanes in each direction. Parking is prohibited along Santa Monica Boulevard; however, adjacent frontage roads provide metered parking and, otherwise, time-restricted curb-side parking.

[3] *More detailed information regarding the major arterials in the study area and lane configurations are presented in Appendix A of the Traffic Report, which is included as Appendix H of the Draft EIR.*



PCR

Not to scale

Project Site and Analyzed Intersections

10000 Santa Monica Boulevard

Source: Fehr & Peers, August 2011.

FIGURE

IV.K-1

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Wilshire Boulevard – Wilshire Boulevard is a Class II major highway in the City of Los Angeles and a major arterial in the City of Beverly Hills. It runs from the west edge of the City of Santa Monica to downtown Los Angeles. In the study area, Wilshire Boulevard provides three through lanes in each direction. Curb-side parking is prohibited on both sides of the street in the study area. Left-turn channelization is provided at most intersections.

Olympic Boulevard – Olympic Boulevard, a Class II major highway, provides two to three through lanes in each direction through the study area. In the study area, parking is permitted during off-peak periods. However, parking is prohibited during peak periods to allow additional through lanes. This prohibition changes the number of through lanes from three to four in each direction. Left-turn channelization is provided at most intersections.

Pico Boulevard – Pico Boulevard, a Class II major highway, provides three through lanes in each direction in the study area. Parking is prohibited on both sides of the street in the study area.

Constellation Boulevard – Constellation Boulevard, a secondary highway in Century City, runs between Century Park West and Century Park East. The street provides two through lanes in each direction. Left-turn channelization is provided at all street intersections and parking is prohibited on both sides of the street.

Durant Drive – Durant Drive, a local street in the City of Beverly Hills, provides one lane of travel in each direction. Parking is permitted on both sides of the street.

(b) North-South Streets

Sepulveda Boulevard – Sepulveda Boulevard, a Class II major highway, provides two lanes in each direction through the study area. Two hour metered parking is permitted along northbound Sepulveda Boulevard and parking is prohibited along southbound Sepulveda Boulevard. Left-turn channelization is provided at most intersections.

Beverly Glen Boulevard – Beverly Glen Boulevard, a Class II major highway, provides two through lanes in each direction through the study area. Parking is generally permitted on both sides of the street and left-turn channelization is provided at most intersections.

Westwood Boulevard – Westwood Boulevard, a Class II major highway north of Santa Monica Boulevard and a secondary highway facility south of Santa Monica Boulevard, provides two lanes in each direction in the study area. Left-turn channelization is present at most intersections and one-hour parking is available on both sides of the street.

Avenue of the Stars – Avenue of the Stars, a Class II major highway running between Santa Monica Boulevard and Pico Boulevard in Century City, provides three through lanes in each direction. Parking is prohibited on both sides of the street and left-turn channelization is present at major intersections.

Beverly Drive – Beverly Drive, a Class II major highway north of Pico Boulevard in the City of Los Angeles and a major arterial in the City of Beverly Hills, provides two through lanes in each direction. Time-restricted and metered parking is generally permitted on both sides of the street and left-turn channelization is provided at most intersections.

Veteran Avenue – Veteran Avenue, a secondary highway facility, provides one through lane in each direction through the study area. Parking is permitted on both sides of the street and left-turn channelization is provided at most intersections.

Overland Avenue – Overland Avenue, a secondary highway extending south from Santa Monica Boulevard, provides one through lane in each direction. Parking is available on the northbound side of the street but prohibited on the southbound side of the street.

Century Park West – Century Park West, a secondary highway between Santa Monica Boulevard and Olympic Boulevard and collector street between Olympic Boulevard and Pico Boulevard, provides two northbound and three southbound through lanes through Century City. Parking is prohibited on both sides of the street and left-turn channelization is present at street intersections.

Century Park East – Century Park East, a secondary highway between Santa Monica Boulevard and Pico Boulevard in Century City, provides three northbound through lanes and two to three southbound through lanes. Parking is prohibited on both sides of the street and left-turn channelization is present at street intersections.

Beloit Avenue - Beloit Avenue, a collector street in the study area, shares roadway with I-405 southbound ramps at the intersection of Beloit Avenue and Santa Monica Boulevard. At that intersection, Beloit Avenue provides four southbound lanes. Parking is prohibited adjacent to the I-405 ramps although parking is provided along other sections of this street.

Cotner Avenue – Cotner Avenue, a collector street in the study area, shares roadway with the I-405 northbound ramps at the intersection of Cotner Avenue and Santa Monica Boulevard. At that intersection, Cotner Avenue provides four northbound lanes. Parking is prohibited adjacent to the I-405 ramps although parking is provided along other sections of this street.

Beverwil Drive - Beverwil Drive, a collector street in the study area, provides two through lanes in each direction. Time-restricted parking is generally permitted on both sides of the street south of Olympic Boulevard. Left-turn channelization is provided at most intersections where left-turn movements are permitted.

Motor Avenue – Motor Avenue, a collector street extending south from Pico Boulevard, provides one through lane in each direction in the study area. Parking is generally permitted on both sides of the street and left-turn channelization is provided at major intersections.

Moreno Drive – Moreno Drive, a local street running along the eastern boundary of the project site, provides access between Santa Monica Boulevard and Olympic Boulevard. The street is one through lane in each direction and parking is generally permitted on both sides south of the project site.

Spalding Drive – Spalding Drive, a local street in the City of Beverly Hills, provides one through lane in each direction. Parking is generally permitted on both sides of the street.

Roxbury Drive – Roxbury Drive, a collector street in the City of Los Angeles, is generally a one-way street providing three to four lanes of northbound travel between Wilshire Boulevard and Santa Monica Boulevard in the City of Beverly Hills and the project study area. North of Santa Monica Boulevard and south of Wilshire Boulevard, Roxbury Drive is a two-way street providing one lane of through travel in each direction. Limited one-hour or permit parking is generally permitted on both sides of the street.

Bedford Drive – Bedford Drive, a local street in the City of Los Angeles, is generally a one-way street providing three to four lanes of southbound travel between Santa Monica Boulevard and Wilshire Boulevard. North of Santa Monica Boulevard and south of Wilshire Boulevard, Bedford Drive operates as a two-way street providing one lane of through travel in each direction. One hour parking is generally permitted along Bedford Drive in the study area.

(3) Public Transit

The study area is well served by transit including the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT, Santa Monica's Big Blue Bus, Culver CityBus, Antelope Valley Transportation Authority (AVTA) and Santa Clarita Transit. As shown in **Figure IV.K-2**, *Transit Lines Serving the Project Area*, below, these agencies operate a number of transit lines in the study area. Santa Monica Boulevard, in particular, is a highly utilized transportation corridor with a number of public transit routes operating along this street. The following are the transit lines available in the study area:

Metro Rapid Line 4/704 – Line 4 provides local service between the City of Santa Monica and downtown Los Angeles. This line runs along the northern edge of the project site on Santa Monica Boulevard and has stops in West Los Angeles, West Hollywood and Echo Park. Line 704 follows the same route as Line 4 but with limited stops. Each line has average headways of 11 minutes during the weekday A.M. and P.M. peak periods.

Metro Line 16/316 – Line 16 provides local service between Century City and downtown Los Angeles, operating principally along 3rd Street. Line 316 follows the same route as Line 16, with fewer stops in order to provide express bus service. These routes provide stops at Cedars-Sinai Hospital, Hancock Park and Westlake. These lines provide combined headways of approximately 15 minutes during the A.M. and P.M. peak periods. In the study area, these lines travel on Santa Monica Boulevard past the project site, terminating at the Century City transit center on Constellation Boulevard.

Metro Line 20/720 – Line 20 is an east/west local service line that provides service from the City of Santa Monica to downtown Los Angeles with stops in West Los Angeles, Westwood, and Beverly Hills. Line 20 follows the same route as the Rapid 720 and Express-Rapid 920, following Wilshire Boulevard in the study area. Both Lines 20 and 720 have average headways of seven minutes in the A.M. and 10 minutes in the P.M. peak periods.

Metro Line 28/728 – Line 28 provides local service between Century City and downtown Los Angeles. In the study area, Line 28 operates along Olympic Boulevard and provides 20 to 25 minute headways during the A.M. and P.M. peak hours. Line 728 follows the same route but with limited stops and average headways of approximately 12 minutes during the A.M. and P.M. peak hours. In Century City, these lines travel along Century Park East, Santa Monica Boulevard, Century Park West, and Constellation Avenue.

AVTA Line 786 – Line 786 provides peak period commuter service between the cities of Lancaster and Palmdale and Century City. During the A.M. peak period, two buses arrive in Century City and during the P.M. peak period, two buses return to Lancaster and Palmdale.

Culver CityBus Line 3 – Line 3 provides local service between Century City and Culver City. In the study area, this line has stops along Constellation Avenue and average A.M. and P.M. peak period headways of 20 minutes.

LADOT Commuter Express Line 573 – Line 573 provides principally southbound express service to Century City during the A.M. peak period and principally northbound express service to the San Fernando Valley during the P.M. peak period between the San Fernando Valley and Century City with stops in Westwood. Line 753 operates with average headways of 20 minutes during the A.M. and P.M. peak periods.

Santa Clarita Transit Line 792 – Line 792 provides express service to Valencia during the A.M. peak period and service to Century City during the P.M. peak period, with stops in Westwood. Average headways are 30 minutes during the A.M. and P.M. peak periods.

Santa Clarita Transit Line 797 – Line 797 provides express service to Century City during the A.M. peak period and northbound service to Valencia during the P.M. peak period, with stops in Westwood. Average headways are 30 minutes during the A.M. and P.M. peak periods.

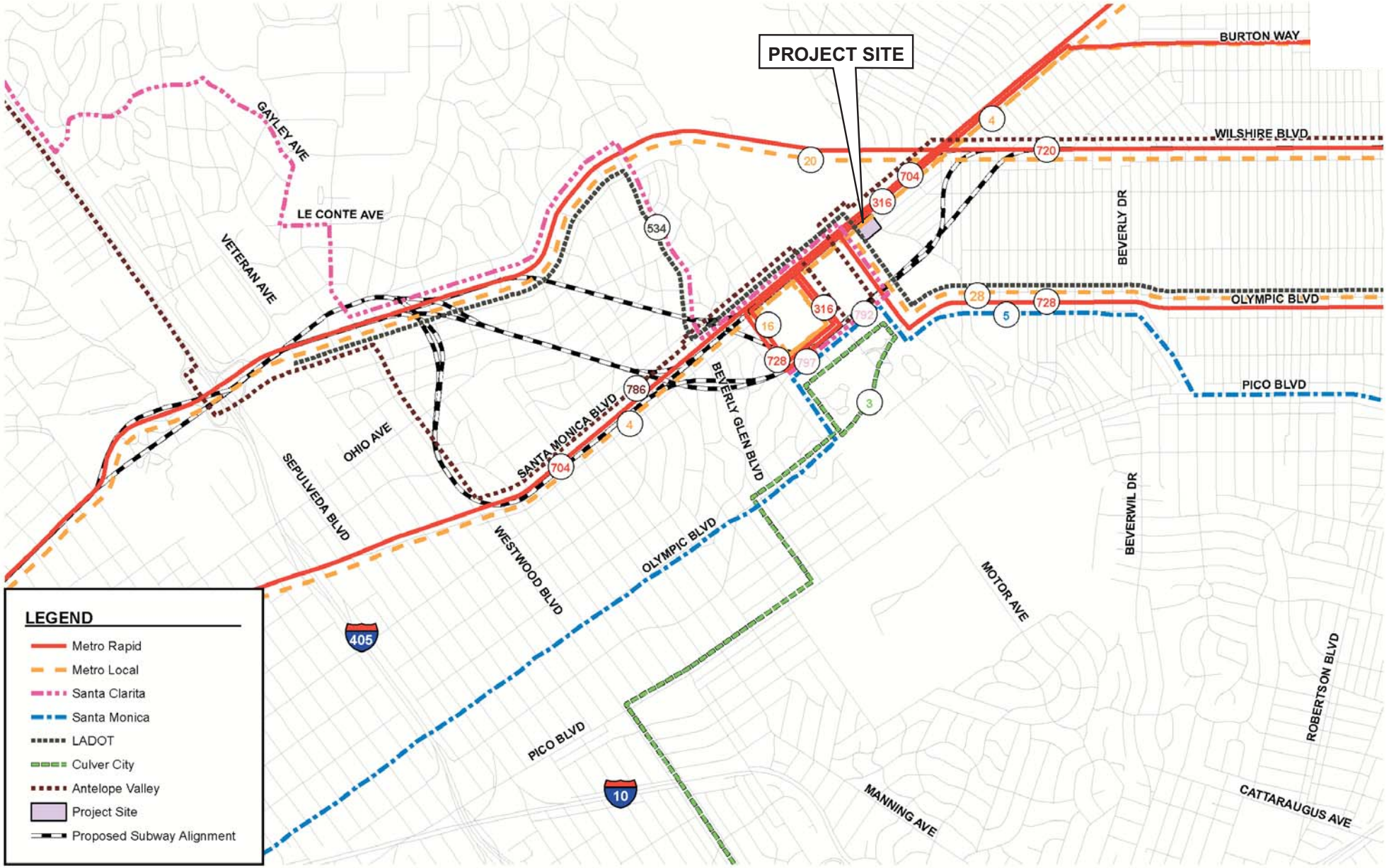
Santa Monica Big Blue Bus Line 5 – Line 5 provides local service between the City of Santa Monica and the Rimpau Transit Center. In the study area, this line operates along Century Park West, Constellation Boulevard, Century Park East, and Olympic Boulevard. Line 5 provides average headways of 20 minutes during the A.M. and P.M. peak periods.

(4) Access

Direct access to the project site is provided by Santa Monica Boulevard to the north and Moreno Drive to the east.

(5) Parking

The project site is currently vacant. No active uses or associated parking for such uses occur on the project site.



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Transit Lines Serving the Project Area

10000 Santa Monica Boulevard

Source: Fehr & Peers, August 2011.

FIGURE

IV.K-2

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(6) Pedestrian/Bicycle Infrastructure

(a) Pedestrian Facilities

The project area has a mature network of pedestrian facilities around the project site including sidewalks, crosswalks and pedestrian safety features. The project site lies adjacent to approximately five feet of sidewalk and a five-foot landscaped strip between the roadway and the walkway on both the northern (Santa Monica Boulevard) and eastern edge (Moreno Drive) of the project site, within the City right-of-way.

(b) Bicycle Facilities

Figure IV.K-3, *Designated Bicycle Routes within the Project Area*, below, illustrates the locations of bicycle routes in the Project area. As shown in the figure, a network of bicycle routes and bicycle-friendly streets are designated throughout the project area. These include designated bicycle lanes along the following streets: Santa Monica Boulevard; Wilshire Boulevard; Avenue of the Stars; Beverly Glen Boulevard; Pico Boulevard; Westwood Boulevard; Sepulveda Boulevard; and Motor Avenue.

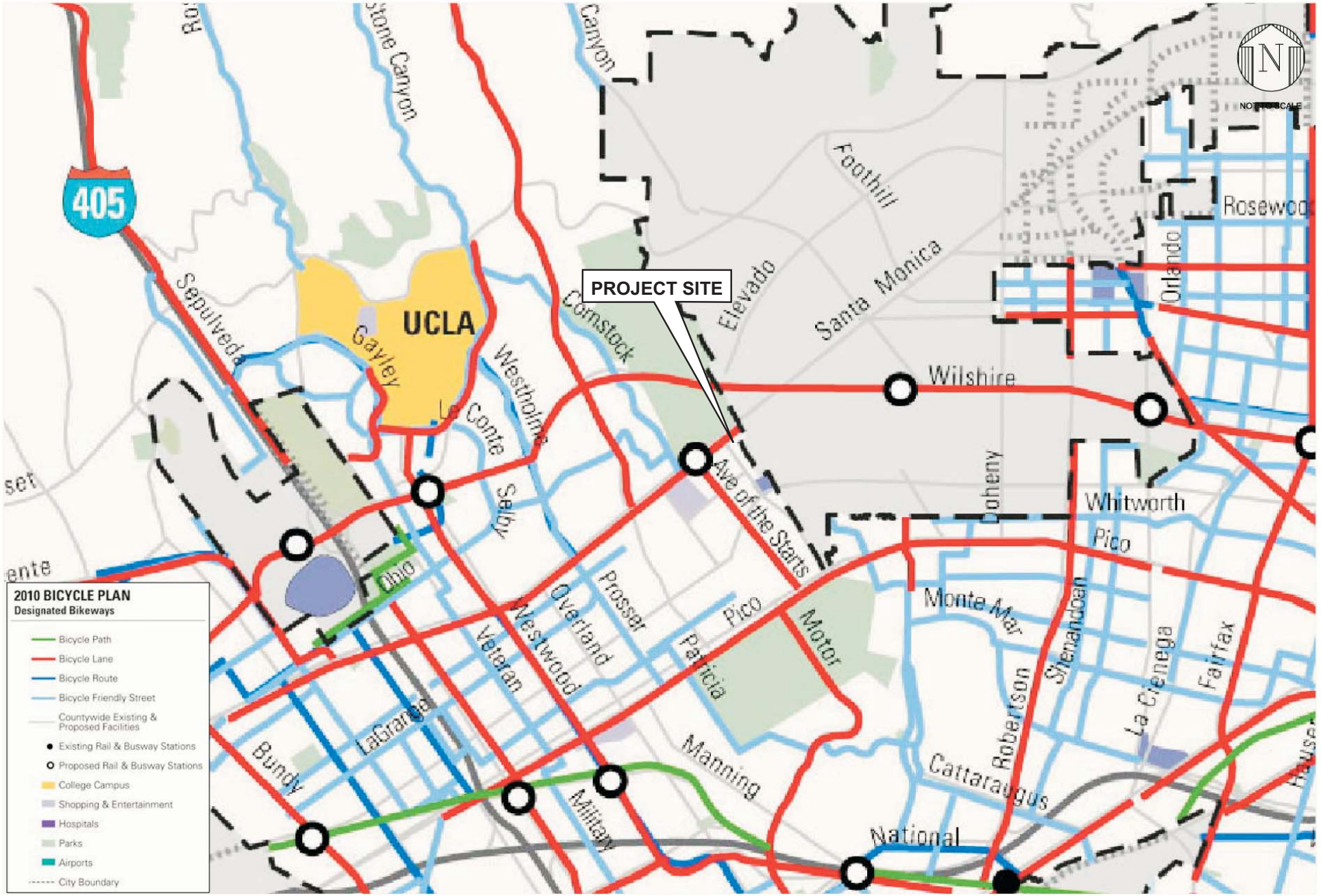
(7) Existing Service Conditions of the Study Intersections

Project intersections that were chosen for analysis were analyzed to determine existing and future traffic level conditions and the potential for project impacts. The scope of the traffic analysis was developed in conjunction with LADOT and City of Beverly Hills Transportation Department. The selection of study intersections was generally based on distribution and assignment of project trips along anticipated travel routes and the potential for more than 10% of project trips (approximately 10 trips in the morning peak hour and 11 trips in the evening peak hour) traversing through an intersection, a level of traffic that could potentially result in significant impacts under City of Los Angeles or City of Beverly Hills project impact criteria. The 42 study intersections selected for analysis in the traffic study met this threshold, based on their potential to be significantly impacted by the project. Other locations, e.g. intersections located within the Beverlywood area, were not selected as part of the study because project traffic through these intersections was expected to be less than 10 trips in the morning peak hour and 11 trips in the evening peak hour, and therefore would not be potentially significantly impacted by the project. The location of the 42 intersections selected for analysis is shown in Figure IV.K-1 on page IV.K-3. Twenty four of the study intersections are located within the City of Los Angeles, thirteen intersections are located within the City of Beverly Hills, and two intersections (Moreno Drive & South Santa Monica Boulevard and Moreno Drive & Durant Drive) are located on the borders of the Cities of Beverly Hills and Los Angeles. Intersections located in the City of Los Angeles were analyzed pursuant to City of Los Angeles significance thresholds, and intersections located in Beverly Hills were analyzed pursuant to Beverly Hills' significance thresholds. Intersections located on the border were analyzed using significance thresholds from both cities. The 42 intersections include the following:[4]

1. Beloit Avenue/I-405 southbound ramps & Santa Monica Boulevard
2. Cotner Avenue/I-405 northbound ramps & Santa Monica Boulevard

[4] *The scope of the project's Traffic Study (including the selection of 42 study intersections) was agreed to and set forth in a Memorandum of Understanding between LADOT and the project's traffic consultant, Fehr & Peers.*

3. Sepulveda Boulevard & Santa Monica Boulevard
4. Veteran Drive & Santa Monica Boulevard
5. Westwood Boulevard & Santa Monica Boulevard
6. Overland Avenue & Santa Monica Boulevard
7. Beverly Glen Boulevard & Santa Monica Boulevard
8. Century Park West & Santa Monica Boulevard
9. Avenue of the Stars & Santa Monica Boulevard
10. Century Park East & Santa Monica Boulevard
11. Moreno Drive & South Santa Monica Boulevard
12. Moreno Drive & Durant Drive
13. Charleville Boulevard & South Santa Monica Boulevard
14. North Santa Monica Boulevard & Wilshire Boulevard
15. South Santa Monica Boulevard & Wilshire Boulevard
16. Roxbury Drive & South Santa Monica Boulevard
17. North Bedford Drive & South Santa Monica Boulevard
18. South Roxbury Drive & Wilshire Boulevard
19. Century Park West & Constellation Avenue
20. Avenue of the Stars & Constellation Avenue
21. Century Park East & Constellation Avenue
22. Overland Avenue & Olympic Boulevard
23. Prosser Avenue & Olympic Boulevard
24. Beverly Glen Boulevard & Olympic Boulevard
25. Century Park West & Olympic Boulevard
26. Avenue of the Stars & Olympic Boulevard westbound ramp
27. Avenue of the Stars & Olympic Boulevard eastbound ramp
28. Century Park East & Olympic Boulevard
29. South Spalding Drive & Olympic Boulevard
30. South Roxbury Drive & Olympic Boulevard
31. Motor Avenue & Pico Boulevard



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Designated Bicycle Routes Within the Project Area

10000 Santa Monica Boulevard

Source: Fehr & Peers, August 2011.

FIGURE

IV.K-3

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32. Avenue of the Stars & Pico Boulevard
33. Century Park East & Pico Boulevard
34. Merv Griffin Way & Santa Monica Boulevard
35. Beverly Drive & Santa Monica Boulevard
36. Beverly Drive & South Santa Monica Boulevard
37. Beverly Drive & Wilshire Boulevard
38. Beverly Drive & Olympic Boulevard
39. Beverwil Drive & Olympic Boulevard
40. Moreno Drive & Alley Way
41. Moreno Drive & Spalding Drive
42. Beverly Glen Boulevard & Pico Boulevard

The existing traffic conditions at these 42 intersections were analyzed on the basis of A.M. and P.M. turning movements,[5] and evaluation of Volume/Capacity (V/C) ratios (or in the case of one unsignalized intersection, delay time in seconds), which are interpreted to reflect level of service (LOS) conditions. Level of Service (LOS) is a qualitative measure to describe the condition of traffic flow on the street system. The definitions of the LOS levels and their related V/C ratio for signalized intersections are shown in **Table IV.K-1**, *Level of Service Definitions for Signalized Intersections*. The delay time for unsignalized intersections is shown in **Table IV.K-2**, *Level of Service Definitions for Unsignalized Intersections*.

The V/C ratios for signalized intersections are based on the volume of traffic through an intersection and the number of lanes available to accommodate the traffic volume. Also considered is the occurrence of Automated Traffic Surveillance and Control (ATSAC) systems, and Adaptive Traffic Control Systems (ATCS), an enhancement to ATSAC systems. Both of these systems monitor traffic conditions and manage signal timing.[6] The methodology used for calculating the V/C ratios is based on Critical Movement Analysis (CMA) method for intersections in Los Angeles and on the ICU methodology for Beverly Hills intersections, pursuant to the practices of each jurisdiction. The unsignalized intersection, Merv Griffin Way and Santa Monica Boulevard, in the City of Beverly Hills was analyzed using the "Two-Way Stop" methodology from the 2000 Highway Capacity Manual (HCM).

Table IV.K-3, *Existing (2011) Service Levels*, below, summarizes the results of existing weekday morning and afternoon peak hour service levels (LOS) at each of the analyzed intersections. As shown in Table IV.K-3, 32

[5] *The Weekday A.M. and P.M. peak hour turning movement counts were collected at the study intersections in November 2010. To determine current (2011) conditions, traffic counts were increased by a factor of 1 percent to account for growth between 2010 and 2011.*

[6] *A credit of 0.07 V/C (reduction) was applied at each intersection where ATSAC is implemented. An additional 0.03 V/C credit was applied at each intersection where ATCS is implemented. Reductions in capacity were assumed for four intersections to reflect oversaturated conditions during the evening peak period.*

Table IV.K-1

Level of Service Definitions for Signalized Intersections

Level of Service	V/C ratio	Definition
A	0.000-0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601-0.700	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701-0.800	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801-0.900	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	0.901-1.000	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	>1.000	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Source: Transportation Research Board, Transportation Research Circular No. 212 Interim Materials on Highway Capacity.

Table IV.K-2

Level of Service Definitions for Unsignalized Intersections

Level of Service	Average Total Delay (seconds/vehicle)
A	< 10.0
B	> 10.0 and < 15.0
C	> 15.0 and < 25.0
D	> 25.0 and < 35.0
E	> 35.0 and < 50.0
F	> 50.0

Source: Transportation Research Board, Highway Capacity Manual, Special Report 209, 2000.

of the 42 study intersections currently operate at acceptable service levels (LOS D or better) during one or both peak periods.

The ten study intersections that operate at an LOS E or F during one or both peak periods are:

No. 1: Beloit Avenue/I-405 Southbound Ramps & Santa Monica Boulevard

No.2: Cotner Avenue/I-405 Northbound Ramps & Santa Monica Boulevard

No 3: Sepulveda Boulevard & Santa Monica Boulevard

Table IV.K-3

Existing (2011) Service Levels

	Intersection	Jurisdiction	Peak Hour	Existing Base Year (Year 2011) V/C or Delay	LOS
**1.	Beloit Avenue/US-405 SB Ramps	Los Angeles	A.M.	0.867	D
	Santa Monica Boulevard		P.M.	1.256	F
**2.	Cotner Avenue/US-405 NB Ramps	Los Angeles	A.M.	0.698	C
	Santa Monica Boulevard		P.M.	0.968	E
**3.	Sepulveda Boulevard	Los Angeles	A.M.	0.858	D
	Santa Monica Boulevard		P.M.	0.900	E
**4.	Veteran Drive	Los Angeles	A.M.	0.647	B
	Santa Monica Boulevard		P.M.	0.873	D
**5.	Westwood Boulevard	Los Angeles	A.M.	0.940	E
	Santa Monica Boulevard		P.M.	0.857	D
**6.	Overland Avenue	Los Angeles	A.M.	0.792	C
	Santa Monica Boulevard		P.M.	0.789	C
**7.	Beverly Glen Boulevard	Los Angeles	A.M.	0.845	D
	Santa Monica Boulevard		P.M.	0.809	D
**8.	Century Park West	Los Angeles	A.M.	0.573	A
	Santa Monica Boulevard		P.M.	0.547	A
9.	Avenue of the Stars	Los Angeles	A.M.	0.735	C
	Santa Monica Boulevard		P.M.	0.612	B
*10.	Century Park East	Los Angeles	A.M.	0.599	A
	Santa Monica Boulevard		P.M.	0.618	B
**11.	Moreno Drive	Los Angeles &	A.M.	0.801	D
	South Santa Monica Boulevard	Beverly Hills	P.M.	0.749	C
12.	Moreno Drive	Los Angeles &	A.M.	0.539	A
	Durant Drive	Beverly Hills	P.M.	0.235	A
13.	Charleville Drive	Beverly Hills [b]	A.M.	0.548	A
	Santa Monica Boulevard		P.M.	0.547	A
14.	Wilshire Boulevard	Beverly Hills [b]	A.M.	1.046	F
	North Santa Monica Boulevard		P.M.	0.980	E
15.	Wilshire Boulevard	Beverly Hills [b]	A.M.	0.910	E
	South Santa Monica Boulevard		P.M.	0.796	C
16.	Roxbury Drive	Beverly Hills [b]	A.M.	0.646	B

Table IV.K-3 (Continued)

Existing (2011) Service Levels

	Intersection	Jurisdiction	Peak Hour	Existing Base Year (Year 2011) V/C or Delay	LOS
	South Santa Monica Boulevard		P.M.	0.601	B
17.	Bedford Drive	Beverly Hills [b]	A.M.	0.618	B
	South Santa Monica Boulevard		P.M.	0.609	B
18.	Roxbury Drive/Brighton Drive	Beverly Hills [b]	A.M.	0.632	B
	Wilshire Boulevard		P.M.	0.572	A
**19.	Century Park West	Los Angeles	A.M.	0.341	A
	Constellation Avenue		P.M.	0.224	A
**20.	Avenue of the Stars	Los Angeles	A.M.	0.552	A
	Constellation Avenue		P.M.	0.492	A
**21.	Century Park East	Los Angeles	A.M.	0.269	A
	Constellation Avenue		P.M.	0.487	A
**22.	Overland Avenue	Los Angeles	A.M.	0.888	D
	Olympic Boulevard		P.M.	0.920	E
**23.	Prosser Avenue	Los Angeles	A.M.	0.636	B
	Olympic Boulevard		P.M.	0.541	A
**24.	Beverly Glen Boulevard	Los Angeles	A.M.	0.954	E
	Olympic Boulevard		P.M.	0.939	E
**25.	Century Park West	Los Angeles	A.M.	0.558	A
	Olympic Boulevard		P.M.	0.754	C
**26.	Avenue of the Stars	Los Angeles	A.M.	0.366	A
	Olympic Boulevard WB Ramps		P.M.	0.328	A
**27.	Avenue of the Stars	Los Angeles	A.M.	0.408	A
	Olympic Boulevard EB Ramps		P.M.	0.286	A
**28.	Century Park East	Los Angeles	A.M.	0.622	B
	Olympic Boulevard		P.M.	0.660	B
*29.	Spalding Drive	Beverly Hills [b]	A.M.	0.924	E
	Olympic Boulevard		P.M.	0.737	C
*30.	South Roxbury Drive	Beverly Hills [b]	A.M.	0.791	C
	Olympic Boulevard		P.M.	0.722	C
**31.	Motor Avenue	Los Angeles	A.M.	0.703	C
	Pico Boulevard		P.M.	0.936	E

Table IV.K-3 (Continued)

Existing (2011) Service Levels

	Intersection	Jurisdiction	Peak Hour	Existing Base Year (Year 2011) V/C or Delay	LOS
**32.	Avenue of the Stars	Los Angeles	A.M.	0.633	B
	Pico Boulevard		P.M.	0.589	A
**33.	Century Park East	Los Angeles	A.M.	0.643	B
	Pico Boulevard		P.M.	0.619	B
34.	Merv Griffin Way	Beverly Hills [b]	A.M.	24.1	C
	North Santa Monica Boulevard [a]		P.M.	36.8	E
35.	Beverly Drive	Beverly Hills [b]	A.M.	0.792	C
	North Santa Monica Boulevard		P.M.	0.835	D
36.	Beverly Drive	Beverly Hills [b]	A.M.	0.756	C
	South Santa Monica Boulevard		P.M.	0.750	C
37.	Beverly Drive	Beverly Hills [b]	A.M.	0.727	C
	Wilshire Boulevard		P.M.	0.795	C
*38.	Beverly Drive	Beverly Hills [b]	A.M.	0.734	C
	Olympic Boulevard		P.M.	0.720	C
*39.	Beverwil Drive	Beverly Hills [b]	A.M.	0.808	C
	Olympic Boulevard		P.M.	0.769	C
40.	Moreno Drive	Beverly Hills [b]	A.M.	12.9	B
	Alley		P.M.	9.4	A
41.	Moreno Drive	Beverly Hills [b]	A.M.	17.3	C
	Spalding Drive		P.M.	13.9	B
**42.	Beverly Glen Boulevard	Los Angeles	A.M.	0.681	B
	Pico Boulevard		P.M.	0.696	B

** Intersection is currently operating under ATSAC system.*

*** Intersection is currently operating under ATSAC and ATCS systems.*

Note : Intersections analyzed using City of Los Angeles (CMA) methodology unless otherwise noted.

[a] Intersection is two-way stop-controlled. Analysis conducted using Highway Capacity Manual stop-controlled methodology. Average vehicular delay in seconds is reported for the stop-controlled approach.

[b] Intersection located within the city limits of Beverly Hills and analyzed using City of Beverly Hills (ICU) methodology.

Source: Fehr & Peers, 2011

Table IV.K-4

Existing Neighborhood Street Segments Traffic Levels

Street Segment	A.M. Peak Hour	P.M. Peak Hour	Weekday Two-Way Daily Traffic
Durant Drive east of Moreno Drive	481	219	2,800
Moreno Drive south of Durant Drive	613	330	4,052
Spalding Drive north of Olympic Boulevard	916	797	9,855
Robins Drive east of Moreno Drive	502	223	3,287
Young Drive east of Moreno Drive	112	22	481

Source: Fehr and Peers, August 2011

No 5: Westwood Boulevard & Santa Monica Boulevard

No 14: North Santa Monica Boulevard & Wilshire Boulevard

No. 15: South Santa Monica Boulevard & Wilshire Boulevard

No. 22: Overland Avenue & Olympic Boulevard

No. 24: Beverly Glen Boulevard & Olympic Boulevard

No. 29: Spalding Drive & Olympic Boulevard

No. 31: Motor Avenue & Pico Boulevard (P.M. peak hour)

No. 34: Merv Griffin Way & Santa Monica Boulevard

(8) Existing Conditions of the Neighborhood Street Segments

Five residential street segments, Durant Drive east of Moreno Drive, Moreno Drive south of Durant Drive, Spalding Drive north of Olympic Boulevard, Robbins Drive east of Moreno Drive and Young Drive east of Moreno Drive, were identified as those that could be impacted by the project and therefore, were selected for analysis in the Traffic Study. All five neighborhood street segments are located in the City of Beverly Hills. In order to determine the existing traffic levels on these streets, 24-hour machine counts were conducted in November 2010, and adjusted with a growth factor of one percent per year to account for growth in traffic between 2010 and 2011. Existing base traffic for these three street segments are shown in **Table IV.K-4**, *Existing Neighborhood Street Segments Traffic Level.*

b. Regulatory Framework

(1) Congestion Management Program

The Congestion Management Program (CMP) is a state-mandated program enacted by the state legislature to address the increasing concern that urban congestion is affecting the economic vitality of the state and diminishing the quality of life in some communities. The 2010 CMP is the eighth CMP adopted for Los Angeles County since the requirement became effective with the passage of Proposition 111 in 1990. The hallmark of the CMP program is that it is intended to address the impact of local growth on the regional transportation system. Statutory requirements of the CMP include monitoring LOS on the CMP Highway and

Roadway network, measuring frequency and routing of public transit, implementing the Transportation Demand Management and Land Use Analysis Program Ordinances and helping local jurisdictions meet their responsibilities under the CMP.

Metro, the local CMP agency, has established a countywide approach to implement the statutory requirements of the CMP in their governing 2010 CMP for Los Angeles County. The countywide approach includes designating a highway network that includes all state highways and principal arterials within the County and monitoring traffic conditions on the designated transportation network; performance measures to evaluate current and future system performance; promotion of alternative transportation methods; analysis of the impact of land use decisions on the transportation network; and mitigation to reduce impacts on the network. If LOS standards deteriorate, then local jurisdictions must prepare a deficiency plan to be in conformance with the countywide plan.

The Transportation Impact Analysis (TIA) Guidelines outlined in Appendix D of the 2010 CMP for Los Angeles County are described in detail in Subsection 3.b, *Thresholds*, below. The CMP guidelines for determining the study area of the analysis for CMP arterial monitoring intersections and for freeway monitoring locations are:

- All CMP arterial monitoring intersections, including monitored on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the A.M. or P.M. weekday peak hours of adjacent street traffic; and
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the A.M. or P.M. weekday peak hours.

There are two CMP monitoring intersections in the study area: Wilshire Boulevard & North Santa Monica Boulevard (Study Intersection No. 14) and Westwood Boulevard & Santa Monica Boulevard (Study Intersection No. 5). Additionally, the CMP freeway monitoring station closest to the project site is I-405 at Venice Boulevard.

(2) West Los Angeles Community Plan Policies

The project site is also subject to the West Los Angeles Community Plan (Community Plan), last updated on July 27, 1999. Specific transportation-related goals, policies and objectives within the Community Plan that are applicable to the project include:

- Goal 10 - Develop a public transit system that improves mobility with convenient alternatives to automobile travel.
    - Objective 10-1 - To encourage improved local and express bus service through the West Los Angeles Community area and encourage park-and-ride facilities to connect with freeways and high occupancy vehicle (HOV) facilities.
        - Policy 10-1.1 - Coordinate with the Metropolitan Transportation Authority (MTA) and the Los Angeles Department of Transportation (LADOT) to improve local express bus service serving the West Los Angeles community.

- Policy 10-1.2 - Encourage the expansion, wherever feasible, of programs aimed at enhancing the mobility of senior citizens, disabled people and the transit-dependent population.

- Objective 10-2 - To increase the work trips and non-work trips made on public transit.

  - Policy 10-2.1 - Develop an intermodal mass transportation plan to implement linkages to future mass transit service.

- Goal 11 - Encourage alternative modes of transportation over the use of single occupant vehicles (SOV) to reduce vehicular trips.

  - Objective 11-1 - To pursue transportation management strategies that can maximize vehicle occupancy, minimize average trip length and reduce the number of vehicle trips.

    - Policy 11-1.1 - Encourage non-residential developments to provide employee incentives for utilizing alternatives to the automobile (car pools, vanpools, buses, flexible work schedules, bicycles and walking).

    - Policy 11-1.2 - Encourage the use of multiple-occupancy vehicle programs for shopping and other activities to reduce midday traffic.

    - Policy 11-1.3 - Require that proposals for major non-residential development projects include submission of a TDM Plan to the City.

    - Policy 11-1.4 - Promote the development of transportation facilities and services that encourage transit ridership, increase vehicle occupancy, and improve pedestrian and bicycle access.

- Goal 12 - A system of safe, efficient and attractive bicycle and pedestrian routes.

  - Objective 12-1 - To promote an adequate system of bikeways for commuter, school and recreational use.

    - Policy 12-1.1 - Plan for and encourage funding and construction of bikeways connecting residential neighborhoods to schools, open space areas and employment centers.

    - Policy 12-1.4 - Encourage the provision of changing rooms, showers and bicycle storage at new and existing non-residential developments and public places.

  - Objective 12-2 - To promote pedestrian-oriented mobility for commuter, school, recreational use, economic activity and access to transit facilities.

    - Policy 12-2.1 – Encourage the safe utilization of public utility easements and other public rights-of-way along flood control channels, railroad rights-of way, and streets wherever feasible for the use of pedestrians.

    - Policy 12-2.2 - Require the installation of sidewalks with all new roadway construction and substantial reconstruction of existing roadways.

        - Policy 12-2.3 - Protect and improve pedestrian-oriented street segments.

- Goal 14 – Discourage non-residential traffic flow on residential streets and encourage community involvement in determining neighborhood traffic controls.

    - Objective 14-1 - To initiate and continue neighborhood based traffic and parking mitigation plans in the community as needed.

        - Policy 14-1.1 - The City should continue to closely work with the community to identify and discuss existing and anticipated "cut-through" traffic and spillover parking from adjacent commercial areas. Through neighborhood / community meetings, strategies and programs can be developed for an effective neighborhood protection plan. Availability of funding to pay for implementation of programs would also be discussed at these meetings.

- Goal 15 – A well-maintained, safe, efficient freeway, highway and street network.

    - Objective 15-1 - Increase capacity on existing transportation systems through minor physical improvements.

        - Policy 15-1.5 - Identify and implement local intersection improvements (channelization, turn lanes, signal modifications) as warranted and feasible.

- Goal 16 – A system of highways, freeways and streets that provides a circulation system which supports existing and planned land uses while maintaining a desired level of service at all intersections.

    - Objective 16-1 – To comply with Citywide performance standards for acceptable Levels of Service (LOS) and ensure that necessary road access and street improvements are provided to accommodate traffic generated by new development.

    - Objective 16-2 - To ensure that the location, intensity and timing of development is consistent with the provision of adequate transportation infrastructure.

        - Policy 16-2.1 - No increase in density shall be effected by zone change, plan amendment, subdivision or other discretionary action, unless it is determined that the transportation infrastructure serving the property can accommodate the traffic generated.

The project's consistency with the above goals, objectives, and policies are discussed in the analysis of impacts below.

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

The project site is also located within the boundaries of the West LA TIMP, adopted on March 8, 1997. The West LA TIMP incorporates a broad area between the Hollywood Hills to the north, the City of Santa Monica boundary to the west, the City of Culver City boundary to the south, and the City of Beverly Hills boundary to the east. The West LA TIMP is intended to provide a mechanism to fund specific transportation improvements due to transportation impacts generated by new development which is subject to the West LA

TIMP. A Transportation Impact Assessment (TIA) process and fee has been established for new development on any lot in the R3 or a less restrictive zone. However, the West LA TIMP exempts multi-family projects from the TIA fee.

Through the establishment of the West LA TIMP, projects subject to this Specific Plan must also execute a Covenant with the City to implement a transportation demand management program satisfactory to the Department of Transportation which is substantially in conformance with the requirements outlined in the West LA TIMP.

(4) City Planning Department's Residential Parking Policy

Section 12.21(A)4 of the Los Angeles Municipal Code (LAMC) sets forth parking requirements for land uses. Parking requirements for condominiums are also set forth in the City Planning Department's "Residential Parking Policy for Division of Land – No. AA 2000-1." This policy provides an elevated parking requirement for new condominiums and condominium conversions of two spaces per unit plus 0.25 spaces per unit for guest parking in non-parking congested areas or 0.5 spaces per unit for guest parking in parking congested areas. The policy document does not specify what is considered a non-parking congested area or parking congested area, but for a conservative analysis, the project will be studied assuming the Advisory Agency Policy rate of 2.5 spaces per unit applies. Per LAMC, parking requirements for condominiums are higher than for apartment units.

3. PROJECT IMPACTS

a. Methodology

Nine separate analyses were prepared to assess the proposed project's potential impacts on Transportation and Circulation. The nine topics are: (1) Construction Traffic; (2) Intersection Traffic; (3) Neighborhood Street Segments; (4) Regional Transportation System; (5) Public Transit; (6) Parking; (7) Access, (8) Pedestrian/Bicycle Safety and (9) Consistency with Plans.

(1) Construction Traffic

The analysis of construction traffic included a determination of the number of construction-related trips (i.e., construction worker trips and construction truck trips) that would occur as a result of the proposed project; the contributions of those trips to the local traffic system; and potential conflicts between construction activity and on-going activity in the project vicinity. Potential conflicts were identified along with mitigation measures to reduce potential conflicts.

(2) Intersection Traffic

The methodology by which intersection traffic impacts are evaluated involves several steps, including the identification of existing traffic conditions, the determination of future baseline conditions (without project traffic), the calculation of project traffic, the assumed distribution of project traffic to determine the number of project trips at each intersection, and an evaluation of project traffic relative to existing and future traffic conditions.

(a) Existing Plus Project Evaluation Procedures

The traffic impact analysis compares the projected LOS at each study intersection under the future baseline (i.e. without project) and future baseline plus project conditions to estimate the incremental increase in the V/C ratio caused by the proposed project (or delay time at the unsignalized intersection). This information is compared to significance criteria established by LADOT and the City of Beverly Hills to determine whether such increases would be significant.

Baseline Conditions. The existing baseline conditions were evaluated to determine the existing roadway service levels using the CMA, ICU and or "Two-Way Stop" methodologies, as applicable to the intersections within Los Angeles and Beverly Hills respectively. These methodologies are discussed further, along with the presentation of the existing baseline conditions in Section 2.a.(7) on page IV.K-12, above.

Project Trip Generation. The number of trips that the proposed project would add to the transportation network was calculated by applying the trip generation rates for a High-Rise Residential Condominium/Townhouse (Use Code 232) that are estimated by the Institute of Transportation Engineers (ITE).

Distribution of Project Trips. The geographic distribution of trips generated by the proposed project is based on an evaluation of the street system serving the project site, the level of accessibility of routes to and from the project site, and the locations of employment and commercial centers to which residents of the project would be drawn.

Existing Baseline plus Project Impacts. The estimated project traffic was added to the existing traffic volumes to estimate the changes in V/C ratios (or delay time for the unsignalized intersection) and/or related LOS levels. The project's added increment was compared to the significance thresholds noted below, to determine whether the additional traffic would constitute a significant impact to the roadway system.

(b) Future Plus Project Evaluation Procedures for the Cumulative Analysis

In addition to the existing baseline analysis discussed above, the estimated project traffic was also added to a future year (Year 2016) baseline to determine whether increases in V/C ratios (delay time) and/or LOS would be significant against the baseline that would occur at the project's completion. The future baseline is based on additional traffic due to ambient traffic growth (general regional effects) and traffic generated by specific developments in the vicinity of the project (related projects). The estimated ambient growth rate is 1 percent per year (compounded yearly). The 40 related projects, that represent known development projects in the vicinity of the project site, are identified in Table III.1, of Section III.B, above.

The trips that would be generated by the ambient growth and related projects was added to the existing conditions baseline. Trip generation estimates for the related projects were calculated using a combination of previous study findings, publicly available environmental documentation, and the trip generation rates contained in Trip Generation, 8th Edition. The estimated number of trips was assigned to the roadway network to identify the total trip generation at each of the analyzed intersection.

(3) Neighborhood Street Segments

The neighborhood street segments analysis addresses the effects of project traffic on three residential street segments in the City of Beverly Hills. Twenty-four-hour machine counts were conducted on the five neighborhood street segments in November 2010. The net new project trips were assigned to the street network based on the project trip distribution pattern described above, and were added to the future base projection to obtain future plus project projections. In order to evaluate the cumulative impact, future daily traffic volumes were projected in a manner similar to the peak hour analysis of the study intersections, including both ambient growth at 1 percent per year as well as anticipated traffic from cumulative projects that could be constructed by 2016.

(4) Regional Transportation System

The 2010 CMP requires that the geographic area examined in the impact analysis must include, at a minimum, all CMP arterial monitoring intersections, including monitored freeway on- or off-ramp intersections, where the proposed project will add 50 or more trips during either the A.M. or P.M. weekday peak hours (of adjacent street traffic). Other criteria include:

- If CMP arterial segments are being analyzed rather than intersections, the study area must include all segments where the proposed project will add 50 or more peak hour trips (total of both directions).
- Within the study area, the impact analysis should include at least one segment between monitored CMP intersections.
- Mainline freeway monitoring locations where the project will add 150 or more trips, in either direction, during either the A.M. or P.M. weekday peak hours.
- Caltrans must also be consulted through the Notice of Preparation (NOP) process to identify other specific locations to be analyzed on the state highway system.

The freeway system analysis determines the traffic volumes the proposed project would generate on nearby freeway segments and freeway on- or off-ramps and compares these project trips to the significance threshold provided. In addition, the freeway system analysis determines whether project-generated trips would exceed the CMP thresholds, thus requiring additional analysis of CMP freeway or intersection locations. If such CMP analysis is required, the project's traffic volumes are compared to the significance threshold to determine whether the project would result in a significant impact on CMP facilities.

(5) Public Transit

Estimated increases in transit person trips generated by the proposed project are based on Appendix B-4 of the 2010 CMP. Appendix B-4 provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the projected number of vehicle trips. This methodology assumes an average vehicle ridership (AVR) factor of 1.4 in order to estimate the number of person trips to and from the project and then provides guidance regarding the percentage of person trips assigned to public transit depending on the type of use (commercial/other versus residential) and the proximity to transit services. Appendix B-4 of the 2010 CMP recommends observing the fixed-route local bus services within ¼ mile of the project Site and express bus routes and rail service within two miles of the project site.

(6) Parking

Parking was analyzed using the City Planning Department's "Residential Parking Policy for Division of Land – No. AA 2000-1," which establishes a standard for new condominiums and condominium conversions of two spaces per unit plus 0.5 spaces per unit for guest parking in parking congested areas. To provide a conservative analysis, the project is assumed to be in a congested parking area of the City of Los Angeles, thus requiring 2.5 spaces per residential unit. This analysis calculates the number of parking spaces that the proposed project would be required to provide pursuant to LAMC and comparing the parking requirement project's proposed parking supply to determine whether adequate parking would be provided.

(7) Access

A level of service analysis was conducted to evaluate the ability of the project's access plan to accommodate the anticipated traffic levels at the access points. For future with project conditions, through traffic on South Santa Monica Boulevard and Moreno Drive was interpolated from traffic cumulative plus project traffic projects. All three driveway locations, which would be un-signalized and stop-controlled, were analyzed using the Two-Way Stop methodology from the *2000 Highway Capacity Manual* (HCM) (Transportation Research Board, 2000). The HCM methodology determines the average vehicle delay for the stop controlled approach to find the corresponding LOS based on the definitions presented in Table IV.K-2, above.

(8) Pedestrian/Bicycle Safety

The methodology for the analysis of pedestrian and bicycle safety impacts includes a review of the project's access and circulation scheme and a determination of whether the project would substantially increase the potential for conflicts between vehicles and pedestrians/cyclists.

(9) Consistency with Plans

The methodology for this analysis includes a review of relevant transportation regulations, plans, and policies and a determination of whether the project would conflict with these regulations, plans, and policies.

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts with regard to Transportation/Traffic. These questions are as follows:

Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

b. Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads and highways?

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

d. Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

e. Result in inadequate emergency access?

f. Result in inadequate parking capacity?

g. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

In the context of the Appendix G questions, the project's significance thresholds are discussed below.

(1) Construction Traffic

The *City of L.A. CEQA Thresholds Guide (2006)* does not specify a threshold of significance for a project's impact associated with construction traffic, stating that the determination of significance shall be made on a case by case basis, considering the temporary traffic impacts, temporary loss of access, temporary loss of bus stops or rerouting of bus lines, and temporary loss of on-street parking. Based on these considerations, project construction would have a significant impact on traffic and circulation if construction activities were to:

TR-1 (1) Cause substantial delays and disruption of existing traffic flow; (2) require temporary relocation of existing bus stops to more than one-quarter mile from their existing stops; (3) result in impacts based on the operational thresholds at intersections during peak periods (refer to intersection thresholds below); or (4) result in the substantial loss of on-street parking such that the parking needs of the project area would not be met.

(2) Intersections

LADOT guidelines and in the *City of L.A. CEQA Thresholds Guide (2006),* state that a project would normally have a significant impact on intersection capacity if:

TR-2 The project traffic causes the following intersection operation conditions with an increase in the volume-to-capacity (V/C) ratio of the following:

Intersection Conditions with project Traffic		Project-related Increase
Final LOS [a]	**V/C Ratio**	**in V/C Ratio**
C	0.701 to 0.800	Equal to or greater than 0.040
D	0.801 to 0.900	Equal to or greater than 0.020
E, F	0.901 or more	Equal to or greater than 0.010

[a] *Final LOS is defined as projected future conditions including project, ambient, and related-project growth, but without project traffic mitigation.*

The City of Beverly Hills thresholds provide that:

TR-3 A project would have a significant traffic impact if the following conditions are met:

LOS	Final V/C Ratio	Project-related Increase in V/C
D	>0.800 to 0.900	Equal to or greater than 0.030
E or F	>0.900	Equal to or greater than 0.020

Under these standards, a project would not have a significant impact at a Beverly Hills intersection, regardless of the V/C ratio increase, if that intersection is operating at LOS A, B or C under cumulative plus project traffic conditions.

(3) Residential Street Segments

All three residential street segments analyzed in the project's Traffic Study are located in the City of Beverly Hills. The City of Beverly Hills guidelines indicate that a project impact on a local residential street would be considered significant if:

TR-4 The projected increase in daily or peak hour traffic volumes is as follows:

Average Daily Traffic (ADT)	Project-Related Increase in Traffic
Less than 2,000	Project increases ADT and/or peak hour traffic by 16 percent
2,001 to 4,000	Project increases ADT and/or peak hour traffic by 12 percent
4,001 to 6,750	Project increases ADT and/or peak hour traffic by 8 percent
Greater than 6,750	Project increases ADT and/or peak hour traffic by 6.25 percent

(4) Regional Transportation System

Based on the *City of L.A. CEQA Thresholds Guide (2006)* and the CMP, a project would normally have a significant freeway capacity impact if:

TR-5 The project traffic causes an increase in the demand-to-capacity (D/C) ratio on a freeway segment or freeway on- or off-ramp of two percent or more (D/C increase $\geq$ 0.02), which causes or worsens LOS F conditions (D/C > 1.00).

The CMP requires that all freeway segments where a completed project adds 150 or more trips in any direction during the peak hours be analyzed. An analysis is also required at all CMP intersections where the completed project will add 50 or more trips during the peak hour. When CMP analysis is required, a significant traffic impact would occur when:

TR-6 The proposed project increases the CMP facility's V/C ratio by 0.02 (i.e., 2.0 percent), causing or worsening LOS F (V/C > 1.00).

(5) Public Transit

The *City of L.A CEQA Thresholds Guide (2006)* and the CMP do not specify a threshold of significance for a project's impact on transit system capacity, stating that the determination of significance for public transit shall be made on a case by case basis, considering the projected number of additional transit passengers expected with implementation of the proposed project and available transit capacity. For purposes of this analysis, impacts on public transit would be considered significant if:

TR-7 The project would add substantial new ridership to the transit lines operating in excess of their capacity or if the project would conflict with adopted policies, plans, or programs supporting alternative transportation.

(6) Access

The *City of L.A. CEQA Thresholds Guide (2006)* states that a project would normally have a significant project access impact if:

TR-8 The intersection(s) nearest the primary site access is/are projected to operate at LOS E or F during the A.M. or P.M. peak hour, under cumulative plus project conditions.

(7) Parking

The *City of L.A. CEQA Thresholds Guide (2006,* states that a project would normally have a significant impact on parking if:

TR-9 The project provides less parking than needed as determined through an analysis of demand from the project**.**

(8) Pedestrian/Bicycle Safety

The *City of L.A. CEQA Thresholds Guide (2006)* states that the determination of significance shall be on a case-by-case basis, considering the following factors:

- The amount of pedestrian activity at project access points.
- Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists.
- The type of bicycle facility the project driveway(s) crosses and the level of utilization.
- The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle or vehicle/vehicle impacts.

Based on these factors, impacts to pedestrians and bicycles would be considered significant if:

TR-10 The project resulted in a regular increase in pedestrian/vehicle or bicycle/vehicle conflict due to project parking and traffic as compared with existing conditions.

(9) Consistency with Plans

The *City of L.A. CEQA Thresholds Guide (2006)* does not specify a threshold of significance for a project's consistency with relevant transportation plans and policies. Therefore, for purposes of this analysis, significant impacts related to consistency with plans would result if:

TR-11 The project would conflict with the implementation of adopted transportation programs, plans, and policies.

c. Project Design Features

(1) Construction

Construction of the project would occur over an approximately three year period with full occupancy expected by 2016. While the LAMC requires that construction activities be limited to the hours from 7:00 A.M. to 9:00 P.M. on weekdays and from 8:00 A.M. to 6:00 P.M. on Saturdays and holidays (with no construction on Sundays), the proposed project would limit construction hours to 7:00 A.M. to 9:00 P.M. on weekdays only, with no construction on weekends. Hauling would be limited to the hours of 8:30 *A.M.* to 4:30 *P.M.* and would be scheduled to alleviate congestion at peak school times.

Site construction would consist of five overlapping phases: mass site grading, fine site grading and foundations, building construction, paving, and architectural coatings. The total construction time is estimated at approximately three years from start to finish. The haul route for the project would be along Santa Monica Boulevard to/from I-405. Trucks would enter and exit from the west end of the site on Santa Monica Boulevard; and use Santa Monica Boulevard for transit to and from the I-405 Freeway. Trucks are expected to be staged off-site and dispatched to the project site as needed.

(2) Operation

Development of the proposed project would generate trips on the local and regional street system. **Table IV.K-5**, *Project Trip Generation*, summarizes the project's daily and peak hour trips. As shown in Table IV.K-5, the project would generate an estimated 1,189 daily trips, including 96 trips during the A.M. peak hour and 108 trips during the P.M. peak hour. No credits for the previous office and restaurant uses were taken in the estimate of net trips.

The proposed Project would provide 708 parking spaces in a partially subterranean parking level and an above ground parking structure located adjacent to the residential building. Vehicular access to the project site would be provided via Santa Monica Boulevard and Moreno Drive with internal access driveways connecting with the parking facility below, as well as with two valet areas. The proposed project would have three driveways:

- A right-turn-in/right-turn-out driveway from Santa Monica Boulevard on the northwest side of the Project Site would provide access to the parking structure, valet and on-site loading area for commercial vehicles. From this entrance, visitors and residents could have their cars parked by valet attendants, or building residents could travel to the parking garage.

Table IV.K-5

Project Trip Generation

Land Use	Size	ITE Code	Daily Rate	Trip Generation Rates [a] A.M. Peak Hour Rate	A.M. Peak Hour In	A.M. Peak Hour Out	P.M. Peak Hour Rate	P.M. Peak Hour In	P.M. Peak Hour Out	Estimated Trip Generation Daily Trips	A.M. Peak Hour Trips In	A.M. Peak Hour Trips Out	A.M. Peak Hour Trips Total	P.M. Peak Hour Trips In	P.M. Peak Hour Trips Out	P.M. Peak Hour Trips Total
Condominium																
High-Rise Residential Condominium/Townhouse	283 du	222/ 232	4.20 [b]	0.34 [b]	19%	81%	0.38 [b,c]	62%	38%	1,189	18	78	96	67	41	108
Less: Transit Use credit	*0%*									*0*	*0*	*0*	*0*	*0*	*0*	*0*
Less: Internal Trips credit	*0%*									*0*	*0*	*0*	*0*	*0*	*0*	*0*
Net External Vehicle Trips										**1,189**	**18**	**78**	**96**	**67**	**41**	**108**

[a] *Source for trip generation rates: Trip Generation, 8th Edition, Institute of Transportation Engineers (ITE), 2008, unless otherwise noted.*

[b] *For flexibility, the trip generation analysis uses the most conservative (highest) rates for high-rise apartments versus high-rise condominiums: ITE code 222 (high-rise apartment) for daily trips and ITE code 232 (high-rise condominium) for peak hour trips.*

[c] *The West LA TIMP does not provide a PM peak hour trip generation rate for high-rise residential such as the proposed project, therefore the ITE trip generation rate was used for such purpose as permitted by the West LA TIMP.*

Source: Fehr & Peers, May 2010

- A right–turn exit-only driveway onto South Santa Monica Boulevard, located east of the aforementioned driveway, would provide an exit onto eastbound South Santa Monica Boulevard.
- A full-access driveway would be located along the eastern side of the Project Site on Moreno Drive, approximately mid-block between Santa Monica Boulevard and Durant Drive. Vehicles would be able to enter this driveway by either turning right from southbound Moreno Drive or left from northbound Moreno Drive. Vehicles could also exit from this driveway and turn left or right out of the site onto Moreno Drive. The Moreno Drive Driveway is proposed to be closed to vehicular access during weekday morning and afternoon peak periods to facilitate traffic access to/from Beverly Hills High School.

d. Analysis of Project Impacts

(1) Construction

(a) Construction Trucks

The mass site grading phase of the project is estimated to generate an average of approximately 29 truck trips per day over the approximately two-month excavation period. The proposed project would limit construction hours to 7:00 A.M. to 9:00 P.M. on weekdays only, with no construction on weekends. Hauling would be limited to the hours of 8:30 *A.M.* to 4:30 *P.M.* and would be scheduled to alleviate congestion at peak school times.

(b) Construction Employees

The number of construction workers would vary throughout the construction period with the building construction phase generating the highest number of trips. A maximum of 130 construction worker trips are expected to be generated per day during periods of peak construction activity. Construction workers often travel to and from a worksite outside of the typical peak commute hours. The construction activity would

generate fewer daily and peak hour trips than are projected for the project once it is completed and occupied (1,189 daily trips, 96 A.M. peak hour trips, and 108 P.M. peak hour trips*).*

Given the level of traffic at some of the study intersections near the project site, the combination of haul truck and employee traffic could cause temporary adverse impacts at some intersections during the construction period. Since LADOT does not consider temporary construction impacts to be significant and since project construction is expected to generate fewer trips than the project when in operation (which as discussed below, would have a less than significant impact), the project impact on traffic during the construction period is considered to be less than significant.

In addition, the project could require short-term excavation into South Santa Monica Boulevard and Century Park East for utility connections (water and sewer hook-ups). The extent of such excavation is subject to final design of the utility provisions and discussions with LADWP and LADOT. Although less than significant impacts would be short-term, mitigation measures are recommended to reduce impacts.

(2) Operation

(a) Intersection Impacts

As indicated in Table IV.K-5, above, the proposed project would create 1,189 daily trips: 96 during the A.M. peak hour and 108 during the P.M. peak hour. The distribution of the project's trips on the regional street network is illustrated in **Figure IV.K-4**, *Regional Trip Distribution*, below. **Figure IV.K-5**, *Project Only Peak Hour Traffic Volumes*, below, illustrates the estimated project generated trips at each of the study intersections.

Project traffic volumes illustrated in Figure IV.K-5 were analyzed to determine the projected V/C ratios and LOS for each of the analyzed intersections. **Table IV.K-6**, *Existing Plus Project Intersection Level of Service Analysis*, below, presents the LOS that occurs under existing conditions and the LOS that would occur to existing streets as a result of the proposed project. As indicated in Table IV.K-6, under the existing conditions the following intersections are projected to operate at LOS E or F during one or both peak hours:

1. Beloit Avenue/I-405 Southbound Ramps & Santa Monica Boulevard
2. Cotner Avenue/I-405 Northbound Ramps & Santa Monica Boulevard
3. Sepulveda Boulevard & Santa Monica Boulevard
5. Westwood Boulevard & Santa Monica Boulevard
14. Wilshire Boulevard & North Santa Monica Boulevard
15. Wilshire Boulevard & South Santa Monica Boulevard
22. Overland Avenue & Olympic Boulevard
24. Beverly Glen Boulevard & Olympic Boulevard
29. Spalding Drive & Olympic Boulevard
31. Motor Avenue & Pico Boulevard
34. Merv Griffin Way & North Santa Monica Boulevard

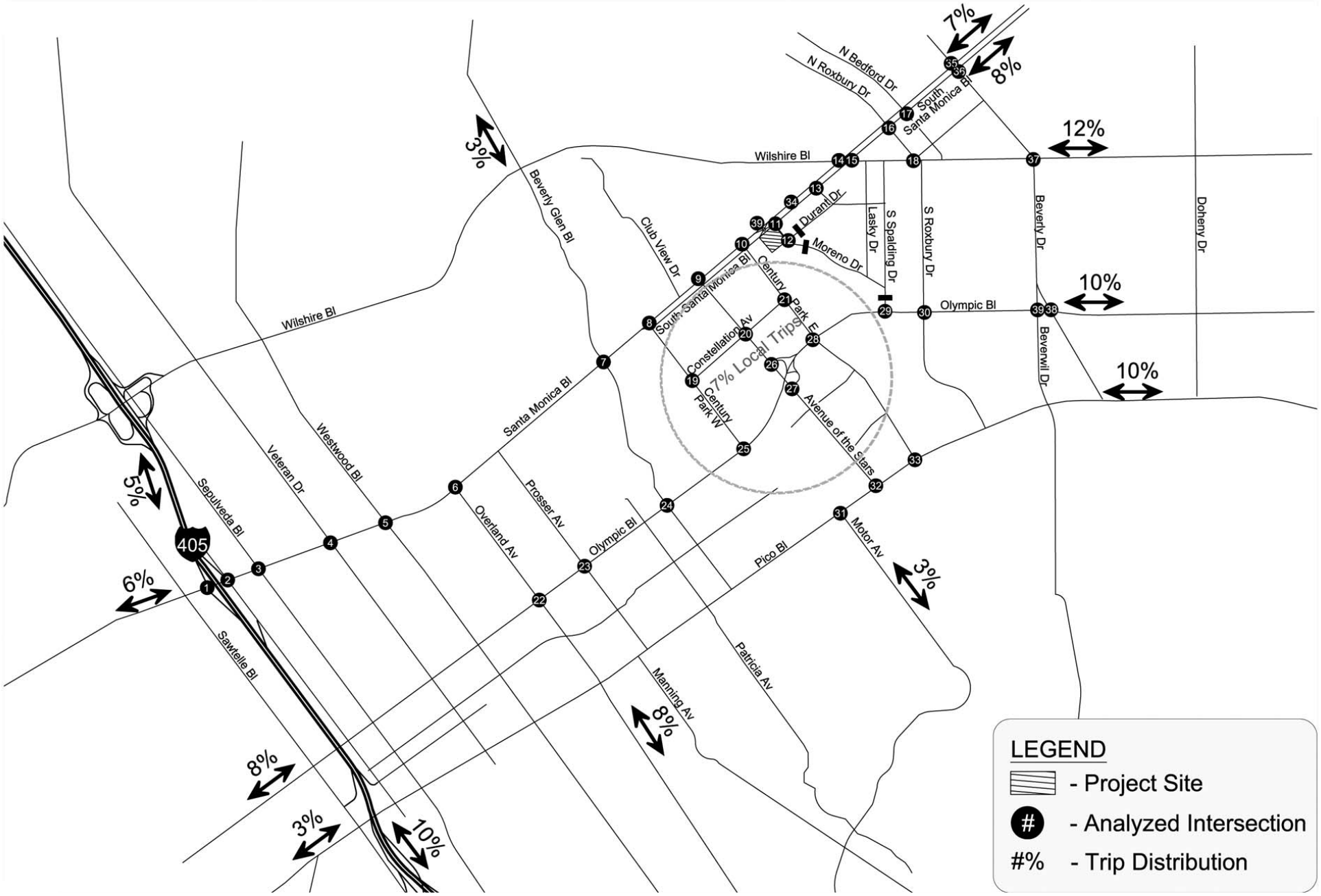
Intersections operating at LOS E and F have more stringent limits for evaluating significant impacts. As shown in Table IV.K-6, after applying the aforementioned City of Los Angeles and City of Beverly Hills significant impact criteria, it is determined that the proposed project's contribution to the roadway traffic would not result in any significant impacts to study intersections under existing plus project conditions. No mitigation measures would be required.

(b) Impacts on Neighborhood Streets

Daily traffic volumes for the project plus existing conditions are summarized in **Table IV.K-7**, *Neighborhood Street Impact Analysis – Daily Volume Analysis – Existing Conditions Baseline.* As shown in Table IV.K-7, the project is estimated to increase daily traffic on Durant Drive east of Moreno Drive by approximately 3.0 percent; increase daily traffic on Moreno Drive south of Durant Drive by approximately 3.9 percent; and increase daily traffic on Spalding Drive north of Olympic Boulevard by approximately 1.7 percent. The project would not increase daily traffic on Robbins Drive east of Moreno Drive or Young Avenue east of Moreno Drive. These increases would not exceed City of Beverly Hills impact criteria for daily volumes on neighborhood streets and, therefore, the project would have a less than significant impact with respect this issue. Since the increase in daily traffic on these residential streets nearest the project site would be less than significant, daily traffic increases on residential streets farther from the project site would also be less than significant.

Morning and afternoon peak hour traffic volumes for the project plus existing conditions are summarized in **Table IV.K-8**, *Neighborhood Street Impact Analysis – Peak Hour Analysis – Existing Baseline Conditions.* As shown in Table IV.K-8, the project is estimated to increase A.M. peak hour traffic on Durant Drive east of Moreno Drive by approximately 2.3 percent; A.M. peak hour traffic on Moreno Drive south of Durant Drive by approximately 3.4 percent; and increase A.M. peak hour traffic on Spalding Drive north of Olympic Boulevard by approximately 3.4 percent. The project would not increase A.M. peak hour traffic on Robbins Drive east of Moreno Drive or Young Avenue east of Moreno Drive. The increases would not exceed City of Beverly Hills impact criteria for A.M. peak hour traffic on neighborhood streets and, therefore, the project would have a less than significant impact with respect this issue.

Table IV.K-8 also shows that the project is estimated to increase P.M. peak hour traffic on Durant Drive east of Moreno Drive by approximately 2.7 percent; P.M. peak hour traffic on Moreno Drive south of Durant Drive by approximately 3.3 percent; and increase P.M. peak hour traffic on Spalding Drive north of Olympic Boulevard by approximately 1.5 percent. The project would not increase P.M. peak hour traffic on Robbins Drive east of Moreno Drive or Young Avenue east of Moreno Drive. The increases would not exceed City of Beverly Hills impact criteria for P.M. peak hour traffic on neighborhood streets and, therefore, the project would have a less than significant impact with respect this issue. Since peak hour traffic on residential streets nearest the project site (which would be more likely than more distant neighborhood streets to be impacted) would be less than significant, any increases in peak hour traffic on residential streets farther from the project site would also be less than significant.



PCR

N

Not to scale

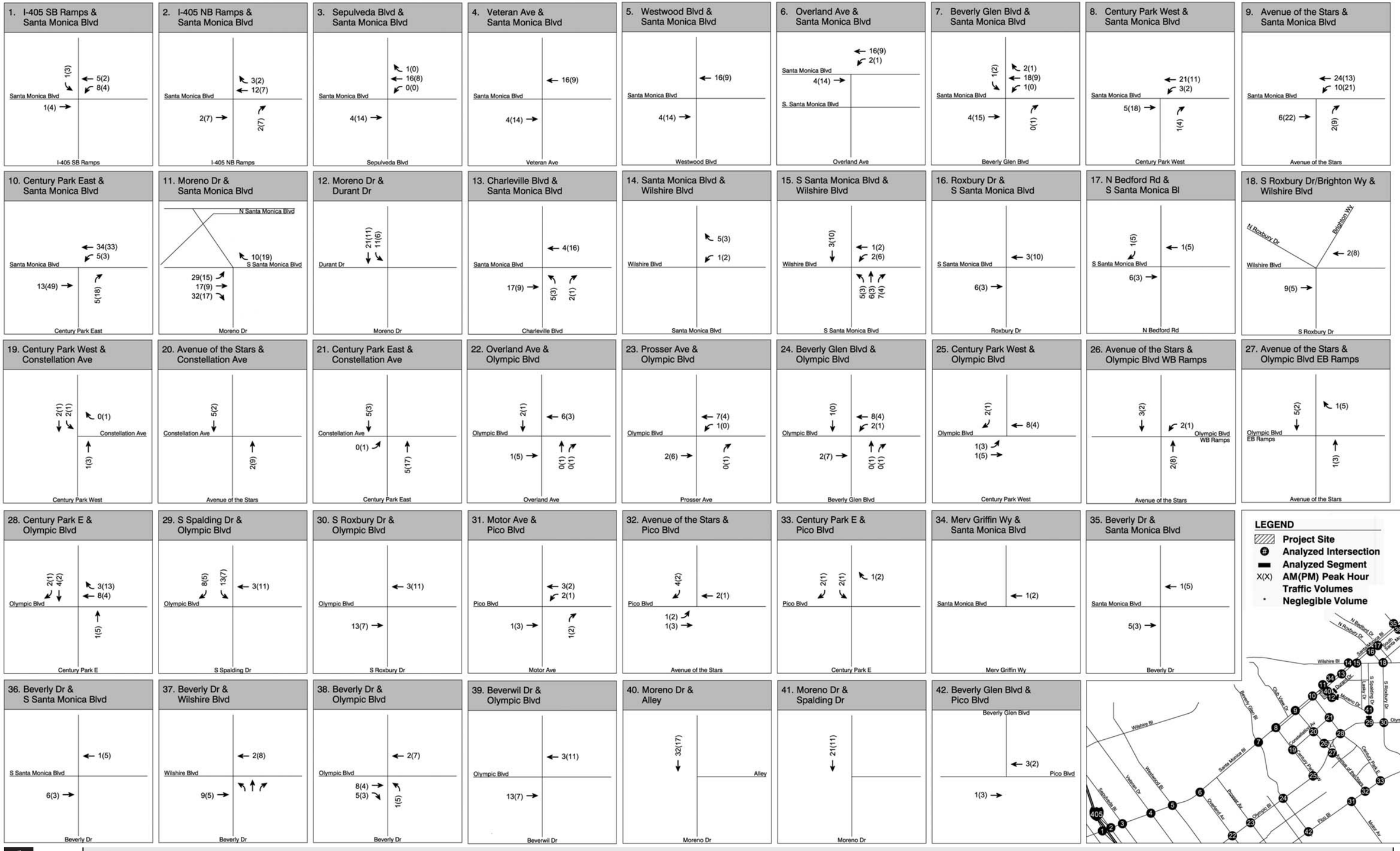
Regional Trip Distribution

10000 Santa Monica Boulevard

Source: Fehr & Peers, August 2011.

FIGURE

IV.K-4



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Not to scale

Project Only Peak Hour Traffic Volumes

10000 Santa Monica Boulevard

Source: Fehr & Peers, August 2011.

FIGURE

IV.K-5

Table IV.K-6

Existing Plus Project Intersection Level of Service Analysis

Intersection		Jurisdiction	Peak Hours	Existing Base		Existing Plus Project		Project increase in V/C	Significant Project Impacts
				V/C or delay	LOS	V/C or delay	LOS		
**1.	Beloit Avenue/US-405 SB Ramps	Los Angeles	A.M.	0.867	D	0.870	D	0.003	NO
	Santa Monica Boulevard		P.M.	1.256	F	1.262	F	0.006	NO
**2.	Cotner Avenue/US-405 NB Ramps	Los Angeles	A.M.	0.698	B	0.701	C	0.003	NO
	Santa Monica Boulevard		P.M.	0.968	E	0.972	E	0.004	NO
**3.	Sepulveda Boulevard	Los Angeles	A.M.	0.858	D	0.859	D	0.001	NO
	Santa Monica Boulevard		P.M.	0.900	E	0.903	E	0.003	NO
**4.	Veteran Drive	Los Angeles	A.M.	0.647	B	0.651	B	0.004	NO
	Santa Monica Boulevard		P.M.	0.873	D	0.876	D	0.003	NO
**5.	Westwood Boulevard	Los Angeles	A.M.	0.940	E	0.941	E	0.001	NO
	Santa Monica Boulevard		P.M.	0.857	D	0.860	D	0.003	NO
**6.	Overland Avenue	Los Angeles	A.M.	0.792	C	0.794	C	0.002	NO
	Santa Monica Boulevard		P.M.	0.789	C	0.795	C	0.006	NO
**7.	Beverly Glen Boulevard	Los Angeles	A.M.	0.845	D	0.847	D	0.002	NO
	Santa Monica Boulevard		P.M.	0.809	D	0.811	D	0.002	NO
**8.	Century Park West	Los Angeles	A.M.	0.573	A	0.576	A	0.003	NO
	Santa Monica Boulevard		P.M.	0.547	A	0.551	A	0.004	NO
9.	Avenue of the Stars	Los Angeles	A.M.	0.735	C	0.738	C	0.003	NO
	Santa Monica Boulevard		P.M.	0.612	B	0.615	B	0.003	NO
*10.	Century Park East	Los Angeles	A.M.	0.599	A	0.601	B	0.002	NO
	Santa Monica Boulevard		P.M.	0.618	B	0.634	B	0.016	NO
**11.	Moreno Drive	Los Angeles &	A.M.	0.801	D	0.805	D	0.004	NO
	South Santa Monica Boulevard	Beverly Hills	P.M.	0.749	C	0.766	C	0.017	NO
12.	Moreno Drive	Los Angeles &	A.M.	0.539	A	0.553	A	0.014	NO
	Durant Drive	Beverly Hills	P.M.	0.235	A	0.243	A	0.008	NO
13.	Charleville Drive	Beverly Hills [b]	A.M.	0.548	A	0.556	A	0.008	NO
	Santa Monica Boulevard		P.M.	0.547	A	0.551	A	0.004	NO
14.	Wilshire Boulevard	Beverly Hills [b]	A.M.	1.046	F	1.047	F	0.001	NO
	North Santa Monica Boulevard		P.M.	0.980	E	0.981	E	0.001	NO
15.	Wilshire Boulevard	Beverly Hills [b]	A.M.	0.910	E	0.915	E	0.005	NO
	South Santa Monica Boulevard		P.M.	0.796	C	0.801	D	0.005	NO
16.	Roxbury Drive	Beverly Hills [b]	A.M.	0.646	B	0.647	B	0.001	NO
	South Santa Monica Boulevard		P.M.	0.601	B	0.604	B	0.003	NO
17.	Bedford Drive	Beverly Hills [b]	A.M.	0.618	B	0.618	B	0.000	NO
	South Santa Monica Boulevard		P.M.	0.609	B	0.610	B	0.001	NO
18.	Roxbury Drive/Brighton Drive	Beverly Hills [b]	A.M.	0.632	B	0.633	B	0.001	NO
	Wilshire Boulevard		P.M.	0.572	A	0.573	A	0.001	NO

Table IV.K-6 (Continued)

Existing Plus Project Intersection Level of Service Analysis

	Intersection	Jurisdiction	Peak Hours	Existing Base		Existing Plus Project		Project increase in V/C	Significant Project Impacts
				V/C or delay	LOS	V/C or delay	LOS		
**19.	Century Park West	Los Angeles	A.M.	0.341	A	0.342	A	0.001	NO
	Constellation Avenue		P.M.	0.224	A	0.226	A	0.002	NO
**20.	Avenue of the Stars	Los Angeles	A.M.	0.552	A	0.552	A	0.000	NO
	Constellation Avenue		P.M.	0.492	A	0.492	A	0.000	NO
**21.	Century Park East	Los Angeles	A.M.	0.269	A	0.271	A	0.002	NO
	Constellation Avenue		P.M.	0.487	A	0.488	A	0.001	NO
**22.	Overland Avenue	Los Angeles	A.M.	0.888	D	0.889	D	0.001	NO
	Olympic Boulevard		P.M.	0.920	E	0.922	E	0.002	NO
**23.	Prosser Avenue	Los Angeles	A.M.	0.636	B	0.638	B	0.002	NO
	Olympic Boulevard		P.M.	0.541	A	0.542	A	0.001	NO
**24.	Beverly Glen Boulevard	Los Angeles	A.M.	0.954	E	0.956	E	0.002	NO
	Olympic Boulevard		P.M.	0.939	E	0.939	E	0.000	NO
**25.	Century Park West	Los Angeles	A.M.	0.558	A	0.561	A	0.003	NO
	Olympic Boulevard		P.M.	0.754	C	0.755	C	0.001	NO
**26.	Avenue of the Stars	Los Angeles	A.M.	0.366	A	0.368	A	0.002	NO
	Olympic Boulevard WB Ramps		P.M.	0.328	A	0.329	A	0.001	NO
**27.	Avenue of the Stars	Los Angeles	A.M.	0.408	A	0.408	A	0.000	NO
	Olympic Boulevard EB Ramps		P.M.	0.286	A	0.288	A	0.002	NO
**28.	Century Park East	Los Angeles	A.M.	0.622	B	0.624	B	0.002	NO
	Olympic Boulevard		P.M.	0.660	B	0.660	B	0.000	NO
*29.	Spalding Drive	Beverly Hills [b]	A.M.	0.924	E	0.934	E	0.010	NO
	Olympic Boulevard		P.M.	0.737	C	0.744	C	0.007	NO
*30.	South Roxbury Drive	Beverly Hills [b]	A.M.	0.791	C	0.791	C	0.000	NO
	Olympic Boulevard		P.M.	0.722	C	0.723	C	0.001	NO
**31.	Motor Avenue	Los Angeles	A.M.	0.703	C	0.704	C	0.001	NO
	Pico Boulevard		P.M.	0.936	E	0.938	E	0.002	NO
**32.	Avenue of the Stars	Los Angeles	A.M.	0.633	B	0.634	B	0.001	NO
	Pico Boulevard		P.M.	0.589	A	0.590	A	0.001	NO
**33.	Century Park East	Los Angeles	A.M.	0.643	B	0.644	B	0.001	NO
	Pico Boulevard		P.M.	0.619	B	0.619	B	0.000	NO
34.	Merv Griffin Way	Beverly Hills [b]	A.M.	24.1	C	24.1	C	0 s	NO
	North Santa Monica Boulevard [a]		P.M.	36.8	E	37.2	E	.4 s	NO
35.	Beverly Drive	Beverly Hills [b]	A.M.	0.792	C	0.792	C	0.000	NO
	North Santa Monica Boulevard		P.M.	0.835	D	0.836	D	0.001	NO
36.	Beverly Drive	Beverly Hills [b]	A.M.	0.756	C	0.757	C	0.001	NO
	South Santa Monica Boulevard		P.M.	0.750	C	0.751	C	0.001	NO

Table IV.K-6 (Continued)

Existing Plus Project Intersection Level of Service Analysis

	Intersection	Jurisdiction	Peak Hours	Existing Base V/C or delay	Existing Base LOS	Existing Plus Project V/C or delay	Existing Plus Project LOS	Project increase in V/C	Significant Project Impacts
37.	Beverly Drive	Beverly Hills [b]	A.M.	0.727	C	0.728	C	0.001	NO
	Wilshire Boulevard		P.M.	0.795	C	0.796	C	0.001	NO
*38.	Beverly Drive	Beverly Hills [b]	A.M.	0.734	C	0.735	C	0.001	NO
	Olympic Boulevard		P.M.	0.720	C	0.721	C	0.001	NO
*39.	Beverwil Drive	Beverly Hills [b]	A.M.	0.808	D	0.808	D	0.000	NO
	Olympic Boulevard		P.M.	0.769	C	0.771	C	0.002	NO
40.	Moreno Drive	Beverly Hills [b]	A.M.	12.9	B	13.2	B	.3 s	NO
	Alley [a]		P.M.	9.4	A	9.4	A	0 s	NO
41.	Moreno Drive	Beverly Hills [b]	A.M.	17.3	C	17.8	C	.5 s	NO
	Spalding Drive [a]		P.M.	13.9	B	14.1	B	.2 s	NO
**42.	Beverly Glen Boulevard	Los Angeles	A.M.	0.681	B	0.682	B	0.001	NO
	Pico Blvd		P.M.	0.696	B	0.697	B	0.001	NO

* *Intersection is currently operating under ATSAC system.*

** *Intersection is currently operating under ATSAC and ATCS systems.*

: *Intersections analyzed using City of Los Angeles (CMA) methodology unless otherwise noted.*

[a] *Intersection is two-way stop-controlled. Analysis conducted using Highway Capacity Manual stop-controlled methodology. Average vehicular delay in seconds is reported for the stop-controlled approach.*

[b] *Intersection located within the city limits of Beverly Hills and analyzed using City of Beverly Hills (ICU) methodology.*

Source: Fehr & Peers, 2011

(c) Regional Traffic Analysis

CMP Monitoring Stations

As stated above, two CMP arterial monitoring stations are located in the project study area. These include (1) the Wilshire Boulevard and Santa Monica Boulevard intersection and (2) the Westwood Boulevard and Santa Monica Boulevard intersection. The project is expected to add approximately five trips in the A.M. peak hour and three trips in the P.M. peak hour at Wilshire Boulevard and Santa Monica Boulevard and approximately 23 trips in the A.M. peak hour and 26 trips in the P.M. peak hour. Because the project is not expected to add more than 50 vehicle trips during the peak hours at either of these intersections, it would not exceed CMP threshold criteria.

Nevertheless, the CMP considers a project impact on a CMP arterial monitoring intersection to be regionally significant if the addition of project traffic increases the V/C ratio by 2 percent or more of capacity ($\geq$0.020) at an intersection projected to operate at LOS F (after the addition of project traffic). Because both intersections are expected to operate at LOS E or F (see Table IV.K-6, above), this threshold criteria would apply. However, the project would not increase the V/C ratio by 2 percent or more at these intersections,

Table IV.K-7

Neighborhood Street Impact Analysis – Daily Volume Analysis – Existing Baseline Conditions

Street Segment	Weekday Two-Way Daily Volume	With Project Impact Analysis				
	Existing Base	Project Only	Existing plus Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Durant Drive east of Moreno Drive	2,800	83	2,883	3.0%	12%	NO
Moreno Drive south of Durant Drive	4,052	160	4,212	3.9%	8%	NO
Spalding Drive north of Olympic Boulevard	9,855	172	10,027	1.7%	6.25%	NO
Robins Drive east of Moreno Drive	3,287	0	3.287	0.0%	12%	NO
Young Drive east of Moreno Drive	481	0	481	0.0%	16%	NO

[a] *Uses city of Beverly Hills impact criteria for residential street segments*

Source: Fehr & Peers, August 2011

and therefore would not have a regionally significant impact under the CMP (see future conditions analysis under Subsection 4, Cumulative Impacts, below).

CMP Freeway Monitoring Station

The project site is located approximately 2.25-miles to the east of the I-405 freeway and the nearest CMP freeway monitoring station is located at I-405 at Venice Boulevard. Based on the Project distribution patterns (see Figure IV.K-4, *Regional Trip Distribution*, above), approximately 15 percent of the project trips would be distributed to I-405: 10 percent to and from south I-405, and 5 percent to and from north I-405. According to the trip generation estimates shown in Table IV.K-5 and trip distribution estimates illustrated in Figure IV.K-4, the project is expected to result in an increase of 10 trips in the morning and 11 trips in the evening peak hour on I-405, south of the Santa Monica Boulevard and an increase of approximately five trips in the morning and six trips in the evening peak hour on I-405, north of Santa Monica Boulevard. Since fewer than 150 trips would be added during the A.M. or P.M. peak hours in either direction at any of the freeway segments in the vicinity of the study area, no further analysis of the freeway segments is required for CMP purposes.

Table IV.K-8

Neighborhood Street Impact Analysis – Peak Hour Analysis – Existing Baseline Conditions

A.M. PEAK HOUR

Street Segment	Weekday Two-Way Daily Volume	With Project Impact Analysis				
	Existing Base	Project Only	Existing plus Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Durant Drive east of Moreno Drive	481	11	492	2.3%	16%	NO
Moreno Drive south of Durant Drive	613	21	634	3.4%	8%	NO
Spalding Drive north of Olympic Boulevard	916	21	937	3.4%	6.25%	NO
Robins Drive east of Moreno Drive	502	0	502	0.0%	12%	NO
Young Drive east of Moreno Drive	112	0	112	0.0%	16%	NO

P.M. PEAK HOUR

Street Segment	Weekday Two-Way Daily Volume	With Project Impact Analysis				
	Existing Base	Project Only	Existing plus Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Durant Drive east of Moreno Drive	219	6	225	2.7%	16%	NO
Moreno Drive south of Durant Drive	330	11	341	3.3%	8%	NO
Spalding Drive north of Olympic Boulevard	797	12	809	1.5%	6.25%	NO
Robins Drive east of Moreno Drive	223	0	223	0.0%	12%	NO
Young Drive east of Moreno Drive	22	0	22	0.0%	16%	NO

[a] *Uses city of Beverly Hills impact criteria for residential street segments*

Source: Fehr & Peers, August 2011

(d) Public Transit

Potential increases in transit person trips are based on the projected number of vehicle trips with the assumption of an average vehicle ridership (AVR) factor of 1.4. According to CMP procedures, of the total net person trips of a residential project, 10 percent are assigned as transit riders. Proximity to transit services is also a factor in determining ridership. Metro operates two Rapid bus lines, one express line and three local lines within ¼ mile of the project site. The future Metro Purple Line subway would serve Century City.

Although routing and the location of the station have not yet been determined, several sites within the CCNSP area are being considered. Any of these would be within ¼ to ½ mile of the project site. Metro also operates three Rapid bus lines, an express bus line, and four local lines within ½ mile of the project site, and other municipal bus agencies provide express and local bus service within ½ mile of the of the project site.

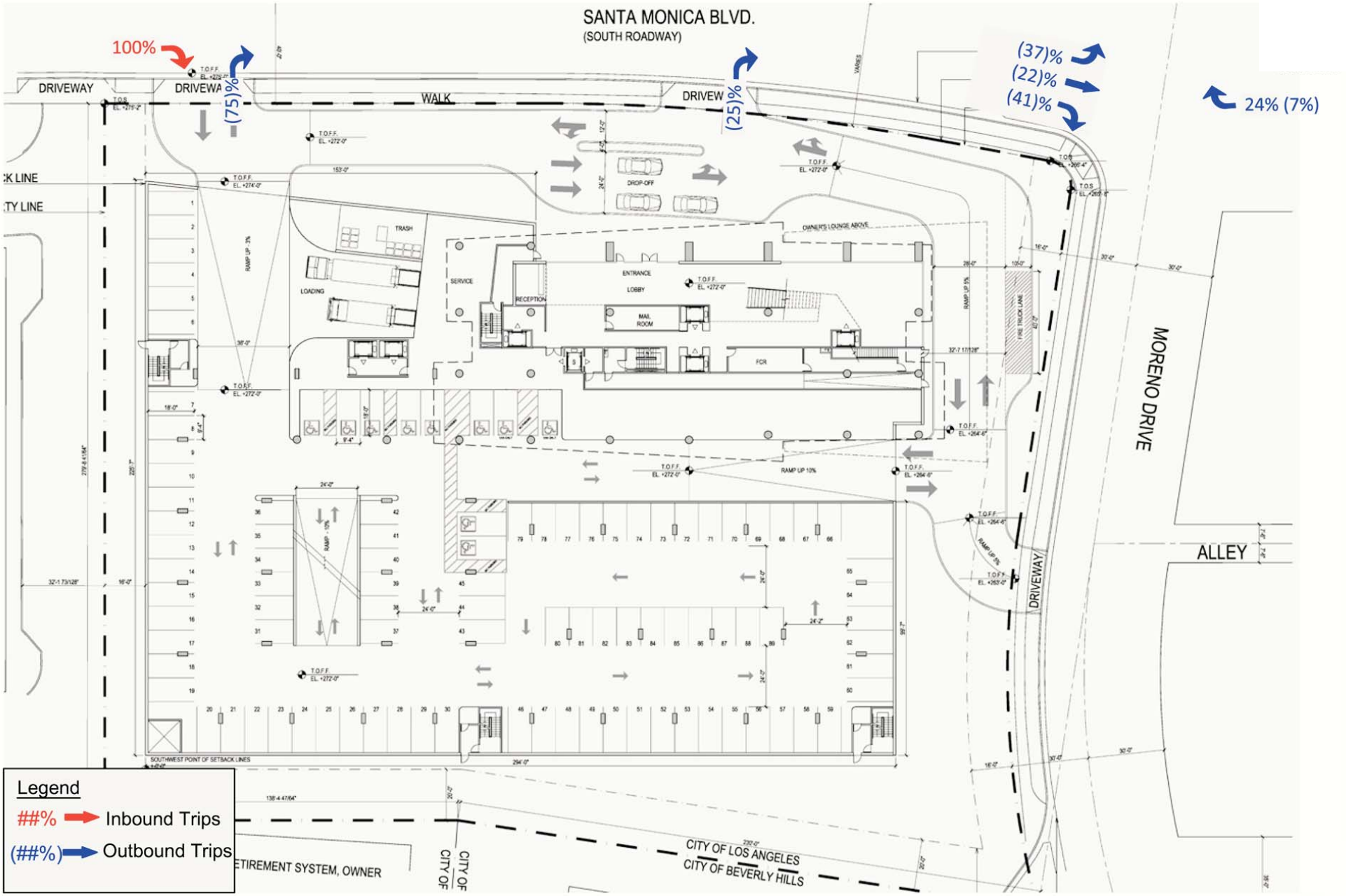
The proposed project is estimated to generate approximately 96 net vehicle trips during the A.M. peak hour and 108 during the P.M. peak hour. According to the AVR factor of 1.4 for the estimated vehicle trips, an estimated increase of approximately 134 and 151 person trips would occur during the A.M. and P.M. peak hours, respectively. Following this approach, the project would generate an estimated increase in transit riders of 14 transit trips during the A.M. peak hour and 16 transit trips during the P.M. peak hour. These transit riders would be distributed to the numerous bus lines and buses passing through on an hourly basis, resulting in a few added riders to any individual bus. These numbers of riders are not expected to represent substantial new riders in excess of existing capacity or to conflict with adopted plans or programs supporting alternative transportation. Therefore, impacts on public transit are expected to be less than significant.

(e) Access

The proposed project would provide three driveways, including two right-turn-only driveways along Santa Monica Boulevard and a full-access driveway (allowing both left and right turns for entering and exiting) on Moreno Drive, approximately mid-block between Santa Monica Boulevard and Durant Drive. All three driveways would be non-signalized and stop-controlled. The Moreno Drive Driveway is proposed to be closed to vehicular access during weekday morning and afternoon peak periods to facilitate traffic access to/from Beverly Hills High School. The level of service analysis for the driveways evaluates the ability of the driveways to accommodate the anticipated traffic levels at the access points. Through traffic on South Santa Monica Boulevard is interpolated according to future cumulative conditions (see Subsection 4, Cumulative Impacts, of this Draft EIR). The analysis is based the Two-Way Stop methodology from *2000 Highway Capacity Manual* (HCM) (Transportation Research Board, 2000). The HCM methodology determines the average vehicle delay for the stop controlled approach to find the corresponding LOS. The distribution of inbound and outbound trips at the respective driveways is illustrated in **Figure IV.K-6**, *Trip Distribution at Project Driveways*, below. **Figure IV.K-7**, *Estimated Project Traffic at Driveways*, below, illustrates the estimated peak hour traffic volumes generated by the project at the three driveways. The evaluation of LOS at the driveways is based on potential peak hour delays, as summarized in **Table IV.K-9**, *Driveway Service Levels*, below. As shown in Table IV.K-9, service levels are expected to be LOS B or LOS C. As indicated, the two driveway locations open during the weekday morning and evening peak period are projected to operate at acceptable LOS levels (LOS B and LOS C) under future with project conditions. Impacts with respect to driveway access would be less than significant.

(f) Parking

The proposed Project would provide 708 parking spaces in a parking structure located adjacent to the residential building. The City Planning Department's "Residential Parking Policy for Division of Land – No. AA 2000-1," requires new residential condominium development to provide two spaces per unit plus 0.5 spaces per unit for guest parking in parking congested areas (the project area is considered to be "parking congested"), which would result in a requirement of 708 spaces. The project would provide 708 spaces and, therefore, would be consistent with the requirements of the City's "Residential Parking Policy," and respective LAMC requirements.



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Not to scale

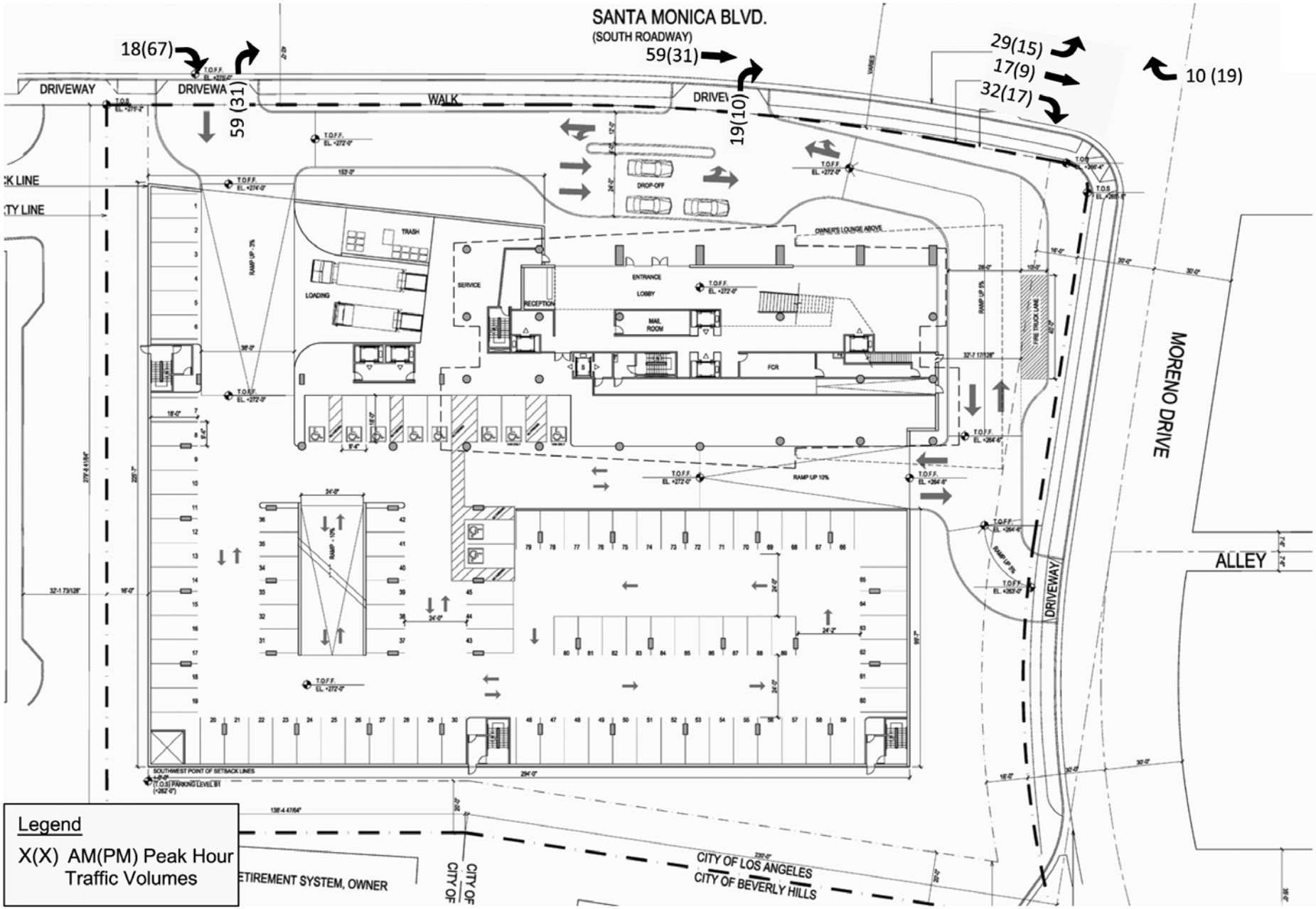
Project Trip Distribution at Project Driveways

10000 Santa Monica Boulevard

Source: Fehr & Peers, August 2011.

FIGURE

IV.K-6



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Not to scale

Estimated Project Traffic at Project Driveways

10000 Santa Monica Boulevard

Source: Fehr & Peers, August 2011.

FIGURE

IV.K-7

Table IV.K-9

Driveway Service Levels

Driveway Location	Peak Hour	Delay (seconds)	LOS
Santa Monica Boulevard Driveway – right-turn in/right-turn out	A.M.	12.1	B
	P.M.	15.8	C
Santa Monica Boulevard Driveway – right-turn out (exit only)	A.M.	11.7	B
	P.M.	14.9	B
Moreno Drive – full access driveway	Driveway is Proposed to be closed during the A.M. and P.M. peak hours.		

Source: Fehr & Peers, August 2011

As indicated, this analysis evaluates the project parking provisions against requirements established in the City Planning Department's "Residential Parking Policy for Division of Land – No. AA 2000-1." This policy provides an elevated parking requirement beyond the parking requirements otherwise established in the LAMC to conservatively accommodate project demand for parking.

Therefore, parking per the City requirements is expected to meet demand; and would not exceed the significance threshold standard. Impacts with respect to parking would be less than significant.

(g) Pedestrian and Bicycle Access and Safety

Bicycle Access and Safety

As shown in Figure IV.K-3, *Designated Bicycle Routes within the Project Area*, above, major streets in the project area, including Santa Monica Boulevard, Avenue of the Stars, and Wilshire Boulevard, provide a network of designated bicycle lanes. The location of a high-density residential use in the proximity of these routes would encourage bicycle activity. The project would provide for the installation of secure, convenient, and easily accessible bicycle parking on-site. In addition, the project would not allow on-street parking or other design features, such as line-of-sight obstruction, that would increase conflicts between cyclists and vehicles. Therefore, because the project would not result in a regular increase in bicycle/vehicle conflict, impacts with respect to bicycle access and safety would be less than significant.

Pedestrian Access and Safety

The proposed project would locate a high-density residential use within walking distance of a range of services, retail, restaurant, office, entertainment, hotel and other land uses and, as such, would increase pedestrian activity in the area. In addition, the project would improve the pedestrian environment by incorporating specific pedestrian amenities, such as landscaping visible from the street-level and a main entrance oriented to the Santa Monica Boulevard sidewalk. As described, above, the project area has a mature network of crosswalks and pedestrian safety features, including signalized crosswalks on Moreno Drive. Sidewalks would include landscaped parkways that would separate pedestrians from the public

street and, therefore, enhance pedestrian safety. Driveways would feature pavement treatment that would visually cue pedestrians to potential vehicle crossings. Because the project would support pedestrian safety with landscaped parkways and well-marked driveway crossings, it would not result in a regular increase in pedestrian/vehicle conflicts. Therefore, impacts with respect to pedestrian access and safety would be less than significant.

In addition, the project's construction would be implemented under a Construction Management Program that would include numerous features for pedestrian safety, such as crossing guards, controlled truck access, use of flagmen, etc. For further discussion, refer to Section IV.J.2, Police Protection.

(h) Consistency with Plans

As discussed above, the project would not result in significant impacts to the CMP arterial monitoring intersections or the CMP freeway monitoring locations. Thus, the project would be consistent with the CMP. In addition, the project would also implement the applicable requirements of the West LA TIMP described above.

Additionally, the proposed project would locate residential development in proximity to existing and future transit routes; would enhance the street frontage; and would not result in significant operational traffic impacts on any of the study intersections, residential street segments, or the freeway system, and thus, would be consistent with the West Los Angeles Community Plan goals to support public transit, encourage alternative modes of transportation , enhance bicycle routes, discourage non-residential traffic flow on residential streets, maintain safe and efficient street network, and maintain a desired level of service at all intersections.

Also, as discussed in Section IV.H, the proposed project would be consistent with the policies of SCAG and other relevant agencies which encourage the use of transit, by locating a high-density residential use adjacent to the Santa Monica Boulevard transit corridor. The project would not conflict with the implementation of adopted transportation programs, plans, and policies; and as such, impacts would be less than significant.

4. CUMULATIVE IMPACTS

a. Project Impacts under Cumulative Base Traffic Conditions

The estimates of cumulative (also known as future plus project) traffic growth for the study area intersections are based on regional ambient traffic growth and traffic generated by related projects in the vicinity of the project (see the Related Projects list in Chapter II, *Existing Conditions*, of this Draft EIR). Future study year conditions without the proposed project are known as "cumulative base conditions." The estimated 2016 cumulative base peak hour traffic volumes are presented in **Table IV.K-10**, *Future (Year 2016) Intersection Level of Service Analysis*, below. As shown in Table IV.K-10, 23 of the 42 study intersections are projected to operate at LOS D or better during the morning and/or afternoon peak hours during cumulative base conditions. The following 19 intersections are projected to operate at LOS E or worse during one or both of the peak hours:

1. Beloit Avenue/I-405 Southbound Ramps & Santa Monica Boulevard
2. Cotner Avenue/I-405 Northbound Ramps & Santa Monica Boulevard

Table IV.K-10

Future (Year 2016) Intersection Level of Service Analysis

	Intersection	Jurisdiction	Peak Hour	Cumulative Base (Year 2016) V/C or Delay	Cumulative Base (Year 2016) LOS	Cumulative Plus Project V/C or Delay	Cumulative Plus Project LOS	Project Increase in V/C	Significant Project Impact
**1.	Beloit Avenue/US-405 SB Ramps	Los Angeles	A.M.	0.942	E	0.945	E	0.003	NO
	Santa Monica Boulevard		P.M.	1.446	F	1.451	F	0.005	NO
**2.	Cotner Avenue/US-405 NB Ramps	Los Angeles	A.M.	0.762	C	0.765	C	0.003	NO
	Santa Monica Boulevard		P.M.	1.090	F	1.094	F	0.004	NO
**3.	Sepulveda Boulevard	Los Angeles	A.M.	0.988	E	0.989	E	0.001	NO
	Santa Monica Boulevard		P.M.	1.200	F	1.203	F	0.003	NO
**4.	Veteran Drive	Los Angeles	A.M.	0.714	C	0.718	C	0.004	NO
	Santa Monica Boulevard		P.M.	1.061	F	1.065	F	0.004	NO
**5.	Westwood Boulevard	Los Angeles	A.M.	1.076	F	1.077	F	0.001	NO
	Santa Monica Boulevard		P.M.	0.991	E	0.994	E	0.003	NO
**6.	Overland Avenue	Los Angeles	A.M.	0.915	E	0.918	E	0.003	NO
	Santa Monica Boulevard		P.M.	0.899	D	0.904	E	0.005	NO
**7.	Beverly Glen Boulevard	Los Angeles	A.M.	0.989	E	0.991	E	0.002	NO
	Santa Monica Boulevard		P.M.	0.957	E	0.959	E	0.002	NO
**8.	Century Park West	Los Angeles	A.M.	0.703	C	0.705	C	0.002	NO
	Santa Monica Boulevard		P.M.	0.710	C	0.714	C	0.004	NO
9.	Avenue of the Stars	Los Angeles	A.M.	1.014	F	1.017	F	0.003	NO
	Santa Monica Boulevard		P.M.	0.690	B	0.693	B	0.003	NO
**10.	Century Park East	Los Angeles	A.M.	0.605	B	0.607	B	0.002	NO
	Santa Monica Boulevard		P.M.	0.721	C	0.737	C	0.016	NO
**11.	Moreno Drive	Los Angeles &	A.M.	0.926	E	0.930	E	0.004	NO
	South Santa Monica Boulevard	Beverly Hills	P.M.	0.925	E	0.932	E	0.007	NO
12.	Moreno Drive	Los Angeles &	A.M.	0.571	A	0.586	A	0.015	NO
	Durant Drive	Beverly Hills	P.M.	0.276	A	0.284	A	0.008	NO
13.	Charleville Drive	Beverly Hills [b]	A.M.	0.639	B	0.647	B	0.008	NO
	Santa Monica Boulevard		P.M.	0.698	B	0.702	C	0.004	NO
14.	Wilshire Boulevard	Beverly Hills [b]	A.M.	1.197	F	1.198	F	0.001	NO
	North Santa Monica Boulevard		P.M.	1.195	F	1.195	F	0.000	NO
15.	Wilshire Boulevard	Beverly Hills [b]	A.M.	1.094	F	1.099	F	0.005	NO
	South Santa Monica Boulevard		P.M.	0.990	E	0.995	E	0.005	NO
16.	Roxbury Drive	Beverly Hills [b]	A.M.	0.764	C	0.765	C	0.001	NO
	South Santa Monica Boulevard		P.M.	0.779	C	0.782	C	0.003	NO
17.	Bedford Drive	Beverly Hills [b]	A.M.	0.727	C	0.728	C	0.001	NO
	South Santa Monica Boulevard		P.M.	0.862	D	0.863	D	0.001	NO
18.	Roxbury Drive/Brighton Drive	Beverly Hills [b]	A.M.	0.812	D	0.812	D	0.000	NO
	Wilshire Boulevard		P.M.	0.840	D	0.842	D	0.002	NO

Table IV.K-10 (Continued)

Future (Year 2016) Intersection Level of Service Analysis

	Intersection	Jurisdiction	Peak Hour	Cumulative Base (Year 2016) V/C or Delay	Cumulative Base (Year 2016) LOS	Cumulative Plus Project V/C or Delay	Cumulative Plus Project LOS	Project Increase in V/C	Significant Project Impact
**19.	Century Park West	Los Angeles	A.M.	0.377	A	0.379	A	0.002	NO
	Constellation Avenue		P.M.	0.283	A	0.285	A	0.002	NO
**20.	Avenue of the Stars	Los Angeles	A.M.	0.597	A	0.597	A	0.000	NO
	Constellation Avenue		P.M.	0.657	B	0.657	B	0.000	NO
**21.	Century Park East	Los Angeles	A.M.	0.302	A	0.304	A	0.002	NO
	Constellation Avenue		P.M.	0.556	A	0.558	A	0.002	NO
**22.	Overland Avenue	Los Angeles	A.M.	1.040	F	1.041	F	0.001	NO
	Olympic Boulevard		P.M.	1.074	F	1.077	F	0.003	NO
**23.	Prosser Avenue	Los Angeles	A.M.	0.724	C	0.725	C	0.001	NO
	Olympic Boulevard		P.M.	0.611	B	0.612	B	0.001	NO
**24.	Beverly Glen Boulevard	Los Angeles	A.M.	1.075	F	1.077	F	0.002	NO
	Olympic Boulevard		P.M.	1.049	F	1.050	F	0.001	NO
**25.	Century Park West	Los Angeles	A.M.	0.609	B	0.611	B	0.002	NO
	Olympic Boulevard		P.M.	0.870	D	0.872	D	0.002	NO
**26.	Avenue of the Stars	Los Angeles	A.M.	0.511	A	0.513	A	0.002	NO
	Olympic Boulevard WB Ramps		P.M.	0.464	A	0.467	A	0.003	NO
**27.	Avenue of the Stars	Los Angeles	A.M.	0.534	A	0.534	A	0.000	NO
	Olympic Boulevard EB Ramps		P.M.	0.355	A	0.357	A	0.002	NO
**28.	Century Park East	Los Angeles	A.M.	0.683	B	0.685	B	0.002	NO
	Olympic Boulevard		P.M.	0.728	C	0.728	C	0.000	NO
*29.	Spalding Drive	Beverly Hills [b]	A.M.	1.001	F	1.011	F	0.010	NO
	Olympic Boulevard		P.M.	0.808	D	0.815	D	0.007	NO
*30.	South Roxbury Drive	Beverly Hills [b]	A.M.	0.856	D	0.857	D	0.001	NO
	Olympic Boulevard		P.M.	0.790	C	0.791	C	0.001	NO
**31.	Motor Avenue	Los Angeles	A.M.	0.806	D	0.807	D	0.001	NO
	Pico Boulevard		P.M.	1.049	F	1.050	F	0.001	NO
**32.	Avenue of the Stars	Los Angeles	A.M.	0.733	C	0.733	C	0.000	NO
	Pico Boulevard		P.M.	0.680	B	0.681	B	0.001	NO
**33.	Century Park East	Los Angeles	A.M.	0.739	C	0.740	C	0.001	NO
	Pico Boulevard		P.M.	0.821	D	0.821	D	0.000	NO
34.	Merv Griffin Way	Beverly Hills [b]	A.M.	***	F	***	F	**	NO
	North Santa Monica Boulevard [a]		P.M.	***	F	***	F	**	NO
35.	Beverly Drive	Beverly Hills [b]	A.M.	0.916	E	0.918	E	0.002	NO
	North Santa Monica Boulevard		P.M.	1.207	F	1.208	F	0.001	NO
36.	Beverly Drive	Beverly Hills [b]	A.M.	0.941	E	0.942	E	0.001	NO
	South Santa Monica Boulevard		P.M.	0.888	D	0.889	D	0.001	NO

Table IV.K-10 (Continued)

Future (Year 2016) Intersection Level of Service Analysis

	Intersection	Jurisdiction	Peak Hour	Cumulative Base (Year 2016) V/C or Delay	LOS	Cumulative Plus Project V/C or Delay	LOS	Project Increase in V/C	Significant Project Impact
37.	Beverly Drive	Beverly Hills [b]	A.M.	0.865	D	0.865	D	0.000	NO
	Wilshire Boulevard		P.M.	1.055	F	1.056	F	0.001	NO
*38.	Beverly Drive	Beverly Hills [b]	A.M.	0.843	D	0.844	D	0.001	NO
	Olympic Boulevard		P.M.	0.854	D	0.859	D	0.005	NO
*39.	Beverwil Drive	Beverly Hills [b]	A.M.	0.875	D	0.876	D	0.001	NO
	Olympic Boulevard		P.M.	0.836	D	0.837	D	0.001	NO
40.	Moreno Drive	Beverly Hills [b]	A.M.	13.3	B	13.7	B	.4 s	NO
	Alley [a]		P.M.	9.5	A	9.5	A	0 s	NO
41.	Moreno Drive	Beverly Hills [b]	A.M.	18.8	C	22.7	C	3.9 s	NO
	Spalding Drive [a]		P.M.	14.5	B	14.8	B	.3 s	NO
**42.	Beverly Glen Boulevard	Los Angeles	A.M.	0.740	C	0.741	C	0.001	NO
	Pico Blvd		P.M.	0.775	C	0.775	C	0.000	NO

* *Intersection is currently operating under ATSAC system.*
** *Intersection is currently operating under ATSAC and ATCS systems.*
: *Intersections analyzed using City of Los Angeles (CMA) methodology unless otherwise noted.*
[a] *Intersection is two-way stop-controlled. Analysis conducted using Highway Capacity Manual stop-controlled methodology. Average vehicular delay in seconds is reported for the stop-controlled approach.*
[b] *Intersection located within the city limits of Beverly Hills and analyzed using City of Beverly Hills (ICU) methodology.*

Source: Fehr & Peers, 2011

2. Sepulveda Boulevard & Santa Monica Boulevard
4. Veteran Drive & Santa Monica Boulevard
5. Westwood Boulevard & Santa Monica Boulevard
6. Overland Avenue & Santa Monica Boulevard
7. Beverly Glen Boulevard & Santa Monica Boulevard
9. Avenue of the Stars & Santa Monica Boulevard
11. Moreno Drive & South Santa Monica Boulevard
14. Wilshire Boulevard & North Santa Monica Boulevard
15. Wilshire Boulevard & South Santa Monica Boulevard
22. Overland Avenue & Olympic Boulevard
24. Beverly Glen Boulevard & Olympic Boulevard
29. Spalding Drive & Olympic Boulevard

31. Motor Avenue & Pico Boulevard
34. Merv Griffin Way & North Santa Monica Boulevard
35. Beverly Drive & North Santa Monica Boulevard
36. Beverly Drive & South Santa Monica Boulevard
37. Beverly Drive & Wilshire Boulevard

As also shown in Table IV.K-10, 23 of the 42 study intersections are projected to operate at LOS D or better during the morning and/or afternoon peak hours under cumulative plus project conditions. Under these conditions, the following 19 intersections are projected to operate at LOS E or worse during one or both of the peak hours:

1. Beloit Avenue/I-405 Southbound Ramps & Santa Monica Boulevard
2. Cotner Avenue/I-405 Northbound Ramps & Santa Monica Boulevard
3. Sepulveda Boulevard & Santa Monica Boulevard
4. Veteran Drive & Santa Monica Boulevard
5. Westwood Boulevard & Santa Monica Boulevard
6. Overland Avenue & Santa Monica Boulevard
7. Beverly Glen Boulevard & Santa Monica Boulevard
9. Avenue of the Stars & Santa Monica Boulevard
11. Moreno Drive & South Santa Monica Boulevard
14. Wilshire Boulevard & North Santa Monica Boulevard
15. Wilshire Boulevard & South Santa Monica Boulevard
22. Overland Avenue & Olympic Boulevard
24. Beverly Glen Boulevard & Olympic Boulevard
29. Spalding Drive & Olympic Boulevard
31. Motor Avenue & Pico Boulevard
34. Merv Griffin Way & North Santa Monica Boulevard
35. Beverly Drive & North Santa Monica Boulevard
36. Beverly Drive & South Santa Monica Boulevard
37. Beverly Drive & Wilshire Boulevard

Based on threshold criteria, the proposed project would not create significant traffic impacts at any of the analyzed intersections under cumulative plus project conditions.

b. Impacts on Neighborhood Streets under Cumulative Conditions

Daily traffic volumes for the project plus future (cumulative) conditions are summarized in **Table IV.K-11**, *Neighborhood Street Impact Analysis – Daily Volume Analysis – Future Conditions.* As shown in Table IV.K-11,

Table IV.K-11

Neighborhood Street Impact Analysis – Daily Volume Analysis – Future Conditions

Street Segment	Weekday Two-Way Daily Volume		With Project Impact Analysis				
	Existing Base	Cumulative Base	Project Only	Cumulative plus Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Durant Drive east of Moreno Drive	2,800	2,940	83	3,023	2.8%	16%	NO
Moreno Drive south of Durant Drive	4,052	4,293	160	4,453	3.7%	8%	NO
Spalding Drive north of Olympic Boulevard	9,855	10,406	172	10,578	1.7%	6.25%	NO
Robins Drive east of Moreno Drive	3,287	3,451	0	3,451	0.0%	12%	NO
Young Drive east of Moreno Drive	481	505	0	505	0.0%	16%	NO

[a] *Uses city of Beverly Hills impact criteria for residential street segments*

Source: Fehr & Peers, August 2011

the project increase compared to the cumulative base would increase future daily traffic on Durant Drive east of Moreno Drive by approximately 2.8 percent; increase daily traffic on Moreno Drive south of Durant Drive by approximately 3.7 percent; and increase daily traffic on Spalding Drive north of Olympic Boulevard by approximately 1.7 percent. The project would not increase daily traffic on Robbins Drive east of Moreno Drive or Young Avenue east of Moreno Drive. Relative to existing conditions, the future percentage increase of traffic on local streets would be slightly reduced. These increases would not exceed City of Beverly Hills impact criteria for future daily volumes on neighborhood streets and, therefore, the project would have a less than significant impact with respect this issue. Since the increase in daily traffic on residential streets nearest the project site (which would be more likely than more distant neighborhood streets to be impacted) would be less than significant, daily traffic increases on residential streets farther from the project site would also be less than significant.

Morning and afternoon peak hour traffic volumes for the project plus future (cumulative) conditions are summarized in **Table IV.K-12**, *Neighborhood Street Impact Analysis – Peak Hour Analysis – Future Conditions.* As shown in Table IV.K-12, the project is estimated to increase future A.M. peak hour traffic on Durant Drive east of Moreno Drive by approximately 2.1 percent; A.M. peak hour traffic on Moreno Drive south of Durant Drive by approximately 3.2 percent; and increase A.M. peak hour traffic on Spalding Drive north of Olympic Boulevard by approximately 2.1 percent. The project would not increase A.M. peak hour traffic on Robbins Drive east of Moreno Drive or Young Avenue east of Moreno Drive. These increases would not exceed City of Beverly Hills impact criteria for A.M. peak hour traffic on neighborhood streets and, therefore, the project would have a less than significant impact with respect this issue.

Table IV.K-12

Neighborhood Street Impact Analysis – Peak Hour Analysis – Future Conditions

A.M. PEAK HOUR

Street Segment	Weekday Two-Way Daily Volume		With Project Impact Analysis				
	Existing Base	Cumulative Base	Project Only	Cumulative plus Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Durant Drive east of Moreno Drive	481	512	11	523	2.1%	16%	NO
Moreno Drive south of Durant Drive	613	651	21	672	3.2%	8%	NO
Spalding Drive north of Olympic Boulevard	916	998	21	1,019	2.1%	6.25%	NO
Robins Drive east of Moreno Drive	502	534	0	534	0.0%	12%	NO
Young Drive east of Moreno Drive	112	154	0	154	0.0%	16%	NO

P.M. PEAK HOUR

Street Segment	Weekday Two-Way Daily Volume		With Project Impact Analysis				
	Existing Base	Cumulative Base	Project Only	Cumulative plus Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Durant Drive east of Moreno Drive	219	236	6	242	2.5%	16%	NO
Moreno Drive south of Durant Drive	330	392	11	403	2.8%	8%	NO
Spalding Drive north of Olympic Boulevard	797	925	12	937	1.3%	6.25%	NO
Robins Drive east of Moreno Drive	223	279	0	279	0.0%	12%	NO
Young Drive east of Moreno Drive	22	111	0	111	0.0%	16%	NO

[a] *Uses city of Beverly Hills impact criteria for residential street segments*

Source: Fehr & Peers, August 2011

Table IV.K-12 also shows that the project is estimated to increase future P.M. peak hour traffic on Durant Drive east of Moreno Drive by approximately 2.5 percent; P.M. peak hour traffic on Moreno Drive south of Durant Drive by approximately 2.8 percent; and increase P.M. peak hour traffic on Spalding Drive north of Olympic Boulevard by approximately 1.3 percent. The project would not increase A.M. peak hour traffic on Robbins Drive east of Moreno Drive or Young Avenue east of Moreno Drive. Relative to existing conditions, the future percentage increase would be slightly reduced. These increases would not exceed City of Beverly Hills impact criteria for P.M. peak hour traffic on neighborhood streets and, therefore, the project would have a less than significant impact with respect this issue. Since peak hour traffic on residential streets nearest the project site (which would be more likely than more distant neighborhood streets to be impacted) would be less than significant, any increases in future peak hour traffic on residential streets farther from the project site would also be less than significant.

5. MITIGATION MEASURES

a. Construction

The following mitigation measures are proposed to ensure that construction-related traffic impacts relative to construction staging, construction parking, and Beverly Hills High School remain less than significant.

Mitigation Measure IV.K-1: Off-site construction truck staging shall not be located on a residential street. The haul route to and from the project site shall be as follows: Enter and exit the west side of the project site from Santa Monica Boulevard; and use Santa Monica Boulevard for transit to and from the I-405 Freeway. Trucks shall not be permitted to travel along other residential streets to the east and south of the project site nor along Moreno Drive south of Durant Drive adjacent to Beverly Hills High School.

Mitigation Measure IV.K-2: A flagman shall be placed at the truck entry and exit from the project site onto Santa Monica Boulevard to control the flow of exiting trucks, to ensure that the exiting trucks do not turn right on to Moreno Drive, and to coordinate the exiting trucks with the traffic signals at Moreno Drive and Santa Monica Boulevard.

Mitigation Measure IV.K-3: Deliveries and pick-ups of construction materials shall be scheduled during non-peak travel periods and coordinated to reduce the potential of trucks waiting to load or unload for protracted periods of time.

Mitigation Measure IV.K-4: During the school year, when construction is underway, trucks shall not be permitted to exit the site on Moreno Drive during peak drop-off and pick-up periods for Beverly Hills High School.

Mitigation Measure IV.K-5: Access shall remain unobstructed for land uses in proximity of the project site during project construction.

Mitigation Measure IV.K-6: Full-time lane closures are not anticipated for the project. Temporary lane closures, when needed, shall be scheduled to avoid peak commute hours and peak school drop-off and pick-up hours to the extent possible. In the event of a lane closure, a worksite traffic control plan, approved by the City of Los Angeles, shall be implemented to route traffic around any such lane closures.

Mitigation Measure IV.K-7: A construction management plan shall be developed by the contractor and approved by the City of Los Angeles. The construction management plan shall include the measures identified above, which mitigate construction-related impacts, and other measures as may be deemed appropriate. The construction management plan shall identify the locations of the off-site truck staging and off-site worker parking to be provided and shall detail measures to ensure that trucks use the specified haul route, do not travel through nearby residential neighborhoods, and are scheduled to minimize conflict with peak drop-off and pick-up times for the adjacent Beverly Hills High School.

b. Operation

Based on the preceding analyses, traffic impacts on intersections, residential street segments, freeway system, public transit, driveway access, parking, pedestrian and bicycle safety, and consistency with plans would be less than significant. Therefore, no mitigation measures would be necessary.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of the above mitigation measures would reduce traffic impacts associated with construction activities. Further, construction impacts would be short-term, and intermittent. Therefore, construction impacts on traffic would be less than significant.

The project would not result in significant operational traffic impacts. No mitigation measures are required.

IV. ENVIRONMENTAL IMPACT ANALYSIS
L. UTILITIES AND SERVICE SYSTEMS
1. WATER SUPPLY

1. INTRODUCTION

This section addresses water demand associated with the proposed project and assesses the adequacy of water supply and infrastructure capacity to meet that demand. The proposed project's consistency with relevant plans and regulations is also discussed. The focus of this section is water consumption for domestic uses. For a discussion of water availability for firefighting, see Section IV.J-1 of this Draft EIR. The following analysis is based in part on a Water Study prepared by SEC Civil Engineers, which is contained in Appendix J.1 of this Draft EIR.[1]

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) State

(a) California Urban Water Management Plan Act

The California Urban Water Management Planning Act (California Water Code [CWC] Division 6, Part 2.6, Sections 10610-10656) addresses several State policies regarding water conservation and the development of water management plans to ensure the efficient use of available supplies. The California Urban Water Management Planning Act also requires water suppliers to develop water management plans every five years to identify short-term and long-term demand management measures to meet growing water demands during normal, dry, and multiple-dry years. Specifically, municipal water suppliers that serve more than 3,000 customers or provide more than 3,000 acre-feet (AF) per year of water must adopt an Urban Water Management Plan (UWMP).

(b) Senate Bill 610, Senate Bill 221, and Senate Bill 7

State legislation addressing water supply, Senate Bill (SB) 610 and SB 221, became effective January 1, 2002. SB 610, codified in CWC §10910 et seq., describes requirements for both water supply assessments (WSAs) and UWMPs applicable to the California Environmental Quality Act (CEQA) process. SB 610 requires that for projects subject to CEQA, which meet specific size criteria, the water supplier must prepare a WSA that determines whether the projected water demand associated with a proposed project is included as part of the most recently adopted UWMP. Specifically, a WSA shall identify existing water supply entitlements, water rights, or water service contracts held by the public water system, and prior years' water deliveries received by the public water system. In addition, it must address water supplies over a 20-year period and consider normal, single-dry, and multiple-dry year conditions. In accordance with SB 610 and Section 10912 of the CWC, such projects subject to CEQA requiring completion of a WSA include the following:

[1] *Water Study/Domestic and Emergency Fire; S.E.C. Civil Engineers, Inc., June 3, 2011.*

- Residential developments of more than 500 dwelling units;
- Shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space;
- Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space;
- Hotels, motels, or both, having more than 500 rooms;
- Industrial, manufacturing, or processing plants, or industrial parks planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area;
- Mixed-use projects that include one or more of the projects specified in this subdivision; or
- Projects that would demand an amount of water equivalent to or greater than the amount of water required by a 500 dwelling unit project.

The WSA must be approved by the public water system at a regular or special meeting and must be incorporated into the CEQA document. The lead agency must then make certain findings related to water supply based on the WSA.

In addition, under SB 610, a water supplier responsible for the preparation and periodic updating of an UWMP must describe the water supply projects and programs that may be undertaken to meet the total project water use of the service area. If groundwater is identified as a source of water available to the supplier, the following additional information must be included in the UWMP: (1) a groundwater management plan; (2) a description of the groundwater basin(s) to be used and the water use adjudication rights, if any; (3) a description and analysis of groundwater use in the past five years; and (4) a discussion of the sufficiency of the groundwater that is projected to be pumped by the supplier.

Complementary legislation to SB 610 was enacted on November 10, 2009, with the passage of SB 7. SB 7 mandates new water conservation goals for UWMPs, requiring urban water suppliers to achieve a 20 percent per capita water consumption reduction by the year 2020 statewide, as described in the "20 x 2020" State Water Conservation Plan.[2] As such, each updated UWMP must now incorporate a description of how each respective urban water supplier will quantitatively implement this water conservation mandate, in addition to the requirements of SB 610.

SB 221 also addresses water supply in the land use planning process and focuses on new residential subdivisions in non-urban areas. SB 221 requires that written verification from the water service provider be submitted indicating sufficient water supply is available to serve a proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of a project. SB 221 specifically applies to residential subdivisions of 500 units or more. In addition, Government Code Section 66473.7(i) exempts "…any residential project proposed for a site that is within an urbanized area and has been previously developed for urban uses; or where the immediate

[2] *California State Water Resources Control Board, 20 x 2020 Water Conservation Plan, February 2010. http://www.swrcb.ca.gov/water_issues/hot_topics/20x2020/docs/20x2020plan.pdf.*

contiguous properties surrounding the residential project site are, or previously have been, developed for urban uses; or housing projects that are exclusively for very low and low-income households."

The proposed project is not subject to the requirements of SB 610, as it neither includes the development of 500 residential units or retail in excess of 500,000 square feet nor would it generate a water demand equivalent to or greater than that required by a 500 dwelling unit project. Therefore, a WSA is not required from the water supplier to demonstrate the proposed project's water demand is included as part of the most recently adopted UWMP. Further, the proposed project is not subject to the requirements of SB 221 because it is located within an urbanized area and because it does not propose the development of 500 or more dwelling units. However, CEQA still requires an analysis of impacts to water supply under its general terms, which is provided below.

(c) California Code of Regulations

Title 20, Sections 1605.1(h) and 1605.1(i) of the California Code of Regulations (CCR) establishes efficiency standards (i.e., maximum flow rates) for all new federally-regulated plumbing fittings and fixtures, including showerheads and lavatory faucets. The maximum flow rate for showerheads and lavatory faucets are 2.5 gallons per minute (gpm) at 80 pounds per square inch (psi) and 2.2 gpm at 60 psi, respectively. In addition, Section 1605.3(h) establishes State efficiency standards for non-federally regulated plumbing fittings, including commercial pre-rinse spray valves.

(d) Global Warming and Climate Change

Global warming and climate change should be considered in assessing water supply in California. Potential impacts of climate change on California's water resources include changes in both water and air temperature, changes in precipitation patterns, and changes in sea levels that could increase pressure on the Sacramento-San Joaquin River Delta (Delta) levees. The impact of climate change on California's water supply has already been the subject of study. In response to Governor's Executive Order S-3-05, California Department of Water Resources (DWR) prepared its most recent report on this issue in May 2009, entitled "Using Future Climate Projections to Support Water Resources Decision Making in California," which presents an overview of the advances that DWR has made toward using future climate projection information to support decision making by quantifying possible impacts to water resources for a range of future climate scenarios. Advances have been made in using future climate projection information in water resources planning in California, including improved understanding of how well selected climate models represent historical climate conditions and refined methodologies for representing stream flows, outdoor urban and agricultural water demands, and sea level rise in planning tools. The range of impacts presented indicated the need for adaptation measures to improve the reliability of future water supplies in California.[3]

DWR has further addressed the issue of climate change and how it can affect California's water supply, by undertaking mitigation and adaptation measures. DWR is a member of the California Climate Action Registry and is listed as a "Climate Action Leader" for reporting its greenhouse gas emissions for three

[3] *"Using Future Climate Projections to Support Water Resources Decision Making in California," May 2009, California Department of Water Resources, page 2.*

consecutive years (2007, 2008 and 2009), and having the data verified by third party audit.[4] In 2008, DWR adopted the "Climate Change Adaptation Strategy," which urges a new approach to California's water and other natural resources in the face of changing climate.[5] In 2009, DWR adopted its own Sustainability Policy, and in 2010, DWR established clear and measurable goals for sustainability implementations.[6],[7]

In December 2010, DWR prepared a survey which presents summaries of 13 different reports and studies prepared by DWR addressing climate change entitled "Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report." Although DWR was one of the early leaders in including climate change analysis in its planning studies and reports, it does not currently have a standard framework or a set of recommended approaches for considering climate change in its planning studies. A variety of approaches to characterize and analyze future climate have been used in various DWR planning studies. The December 2010 paper summarized the approaches and methodologies that have been used since 2006. It is the first comprehensive comparative look at the different approaches, their strengths and weaknesses, and how they have been used in past studies. This work is anticipated to lay the groundwork for a future DWR study aimed at developing a standard framework and a consistent set of approaches to be used for characterizing and analyzing climate change in future DWR planning studies and which may provide guidance for DWR partners and grantees.[8]

While climate change is expected to continue through at least the end of this century, the magnitude and nature of future changes are uncertain. This uncertainty serves to complicate the analysis of future water demand, especially where the relationship between climate change and its potential effect on water demand is not well understood.[9] However, preliminary modeling conducted by DWR indicates that under one climate change scenario, average yearly SWP Table A deliveries in 2050 would be reduced by 10.2 percent.[10]

In light of these conclusions, both governmental agencies and non-governmental organizations recommend that water decision-makers operate existing water systems to allow for increased flexibility. Other recommendations include incorporating climate change research into infrastructure design, conjunctively managing surface water and groundwater supplies, and integrating water and land use practices. As a result, in March 2002, the Metropolitan Water District of Southern California's (MWD) Board of Directors adopted climate change policy principles that relate to water resources. These principles are reflected in MWD's

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4 *California Climate Action Registry, Climate Action Leaders. http://www.climateregistry.org/about/members/climate-action-leaders.html. Accessed April 26, 2011.*

5 *Climate Change Adaptation Strategies for California's Water: Managing an Uncertain Future, California Department of Water Resources, October 2008. http://www.water.ca.gov/climatechange/docs/ClimateChangeWhitePaper.pdf.*

6 *Memorandum to All DWR Employees, "Sustainability Workgroup," California Department of Water Resources, April 22, 2009. http://www.water.ca.gov/climatechange/docs/Sustainability_Policy.pdf.*

7 *Memorandum to All DWR Employees, "Sustainability Targets," California Department of Water Resources, September 20, 2010. http://www.water.ca.gov/climatechange/docs/Sustainability_Policy.pdf.*

8 *"Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report," California Department of Water Resources, December 2010, page v.*

9 *"Progress on Incorporating Climate Change into Management of California's Water Resources," July 2006, California Department of Water Resources, page 2-54.*

10 *Table A water deliveries represent the schedule of the maximum amount of water that water contractors to the DWR may receive annually from the SWP. There are 29 water contractors who have signed long term contractors with the DWR for a total of 4,173 million acre feet per year. Table A deliveries are not guarantees of annual delivery amounts but are used to allocate individual contractors' portion of the delivery amounts available.*

Integrated Resource Plan (IRP), which was updated October 12, 2010.[11] Further, in response to climate change and uncertainty, MWD's 2010 Regional UWMP incorporated three basic elements to promote adaptability and flexibility, important in addressing impacts of climate change: conservation, groundwater recharge, and water recycling.[12]

MWD also approved criteria to further explain its position on the conveyance options that are currently being discussed to remedy the Delta, which include addressing projected sea level rise and change in inflows due to climate change. MWD's criteria provide that, "whatever option is chosen, it should provide water supply reliability, improve export water quality, allow flexible pumping operations in a dynamic fishery environment, enhance the Delta ecosystem, reduce seismic risks, and reduce climate change risks."[13] MWD has demonstrated a commitment to addressing climate change by evaluating the vulnerability of its water systems to global warming impacts and has developed appropriate response strategies and management tools that account for the impacts of climate change on future water supplies. For further discussion on the effects of global climate change, please refer to Section IV.B, Air Quality.

(2) Local

(a) City of Los Angeles Ordinance Nos. 172,075, 163,532, and 170,978

The City of Los Angeles has adopted several ordinances in an effort to reduce water consumption. Specifically, Ordinance No. 172,075 (Chapter XII, Article II of the Los Angeles Municipal Code (LAMC)) requires all building owners to install low-flow showerheads with a maximum flow of 2.5 gpm; water closets with a maximum flow of 3.5 gpm; and low flow urinals with a maximum 1.5 gallons per flush prior to obtaining building permits. Ordinance No. 163,532 (Chapter XII, Article IV of the LAMC) also requires a 10 percent reduction in irrigation for large turf areas (three acres of turf or greater). Ordinance No. 170,978 (Chapter I, Article II of the LAMC) requires numerous water conservation measures in landscape, installation, and maintenance including but not limited to the use of drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray; setting automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation; and watering less in the cooler months and during the rainy season.

Additionally, for the first time since the early 1990s, the City has recently begun enforcement of prohibited water uses as defined in the City's Emergency Water Conservation Plan Ordinance (Chapter XIII, Article I, of the LAMC). When the City's Emergency Water Conservation Plan Ordinance is in effect, LADWP customers cannot:

- Use water on hard surfaces (e.g., sidewalks, walkways, driveways, or parking areas);
- Water lawns between 10:00 A.M. and 5:00 P.M., April 1 to September 30, and between 11:00 A.M. and 3:00 P.M., October 1 to March 31;

[11] *Integrated Water Resources Plan, Report No. 1373, Updated October 12, 2010. The Metropolitan Water District of Southern California. http://www.mwdh2o.com/mwdh2o/pages/yourwater/irp/IRP2010Report.pdf.*

[12] *The Regional Urban Water Management Plan, November 2010. The Metropolitan Water District of Southern California. http://www.mwdh2o.com/mwdh2o/pages/yourwater/RUWMP/RUWMP_2010.pdf.*

[13] *Report for Metropolitan Water District of Southern California Board Meeting September 11, 2007 Agenda Item 8-4, emphasis added.*

- Allow excess water from sprinklers to flood gutters;
- Use water to clean, fill, or maintain decorate fountains unless the water is part of a recycling system;
- Serve water to customers in eating establishments, unless requested; and
- Allow leaks to go unattended.

(b) City of Los Angeles Green Building Program

On April 22, 2008, the City of Los Angeles adopted Ordinance No. 179,820, establishing the Green Building Program. The purpose of the Green Building Program is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional and global ecosystems.[14] The City of Los Angeles will not issue building permits to specified types of developments unless a proposed project can demonstrate that it meets the intent of the criteria for certification of an appropriate LEED level. With regards to water efficiency, the Green Building Program goals include the use of efficient fixtures, wastewater reuse and efficient irrigation.

(c) Los Angeles Department of Water and Power Urban Water Management Plan

In accordance with the California Urban Water Management Planning Act, Los Angeles Department of Water and Power (LADWP) adopted the 2010 UWMP on May 3, 2011, which incorporates the water conservation mandates of SB 7.[15] The UWMP details LADWP's efforts to promote the efficient use and management of its water resources. LADWP's UWMP used a service area-wide method in developing its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the growth in water use for the entire service area was considered in developing long-term water projections for the City of Los Angeles for the next 25 years. The driving factors for this growth are demographics, weather, and conservation. LADWP used anticipated growth in the various customer class sectors, as provided by MWD, who reallocated projected demographic data from the Southern California Association of Governments (SCAG) into member agencies' service areas. The data used was based on SCAG's 2008 Regional Transportation Plan Forecast.[16]

The 2010 UWMP addresses priorities and water supply and demand forecasts through 2035. The forecasts of future demand for water consumption includes information from 40 WSAs that were prepared during the period from 2005 to 2010. Each WSA performed by LADWP is evaluated within the context of the current adopted UWMP and current conditions. MWD, LADWP's supplemental water supplier, has also been actively developing plans and making efforts to provide additional water supply reliability for the entire Southern California region. LADWP coordinates closely with MWD to ensure implementation of MWD's water resource development plans and supplemental water reliability report prepared by MWD. This allows

[14] *City of Los Angeles Municipal Code, Ordinance No. 179820, "Green Building Program."* http://cityplanning.lacity.org/Code_Studies/GreenLa/greenbuildingordinance.pdf.

[15] *2010 Urban Water Management Plan for the Los Angeles Department of Water and Power, January 2011 Draft.* http://www.ladwp.com/ladwp/cms/ladwp013956.pdf.

[16] *2010 Urban Water Management Plan for the Los Angeles Department of Water and Power, January 2011 Draft.* http://www.ladwp.com/ladwp/cms/ladwp013956.pdf.

LADWP to work collaboratively with MWD to ensure the City's anticipated water demands are also incorporated into MWD's long-term water resources development plan.[17]

(d) LADWP's Securing L.A.'s Water Supply

The City of Los Angeles is faced with various ongoing challenges in securing its future water supplies due to among other things droughts, environmental restrictions, and climate change. In response to these uncertainties, the Mayor and LADWP prepared and released a Water Supply Action Plan, entitled "Securing L.A.'s Water Supply," which serves as a blueprint for creating sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies.[18] This plan incorporates an aggressive multi-pronged approach that includes: investments in state-of-the-art technology; a combination of rebates and incentives; the installation of smart sprinklers, efficient washers and urinals; and long-term measures such as expansion of water recycling and investment in cleaning up the local groundwater supply. The plan outlines short-term conservation strategies as well as long-term conservation and recycling measures. Short-term conservation strategies include enforcing prohibited uses of water, expanding the prohibited uses of water, extending outreach efforts, and encouraging regional conservation measures. Long-term conservation and recycling measures include increasing water conservation through reduction of outdoor water use and technology, maximizing water recycling, enhancing stormwater capture, accelerating clean-up of the groundwater basin, and expanding groundwater storage.

b. Existing Conditions

(1) Water Supply

LADWP is responsible for providing water within the City of Los Angeles limits and ensuring that the delivered water quality meets applicable California health standards for drinking water. As the proposed project is located within the City of Los Angeles, LADWP would be the water provider for the project. Water is supplied to the City from three primary sources including the Los Angeles Aqueducts (LAA), local groundwater, and MWD. **Table IV.L.1-1,** *LADWP Water Supply*, summarizes LADWP water supplies from these sources over the last ten years. As shown in Table IV.L.1-1, in 2009, LADWP had an available water supply of 561,306 AF, of which approximately 24.4 percent of LADWP's water supply was from the LAA, approximately 11.6 percent came from local groundwater, approximately 63.2 percent from the MWD, and 1.3 percent was from recycled water.[19] Additionally, less than one percent was taken and stored into the reservoir system. These water sources are described in further detail below.

(a) Los Angeles Aqueducts

Water from the LAA comes primarily from streams and groundwater originating from snowmelt runoff from the Eastern Sierra Nevada Mountains. Due to varying hydrologic conditions, water supply from these sources can fluctuate yearly. The City holds water rights in the Eastern Sierra Nevada where the LAA water

[17] *Ibid.*

[18] *Securing L.A.'s Water Supply, Mayor Antonio R. Villaraigosa and the City of Los Angeles Department of Water and Power, May 2008. http://www.ci.la.ca.us/MAYOR/stellent/groups/ElectedOfficials/@MYR_CH_Contributor/documents/Contributor_Web_Content/LACITY_004714.pdf*

[19] *Los Angeles Department of Water and Power, Water Resources Division, 2010.*

Table IV.L.1-1

LADWP Water Supply

Year	Los Angeles Aqueducts	Local Groundwater	MWD	Recycled Water	Transfer, Spread, Spills, and Storage	Total
1999	309,037	170,660	164,112	1,812	3,507	649,128
2000	255,183	87,946	336,116	2,200	-2,569	678,876
2001	266,923	79,073	309,234	1,636	1,994	658,860
2002	179,338	92,376	410,329	1,945	1,405	685,393
2003	251,942	90,835	322,329	1,759	-2,528	664,337
2004	202,547	71,831	391,834	1,774	2,958	670,944
2005	368,839	56,547	185,346	1,402	-3,140	608,994
2006	378,956	63,270	188,781	3,981	1,336	636,324
2007	129,400	89,018	439,436	3,674	1,044	660,484
2008	147,365	60,149	429,110	7,051	1,664	642,011
2009	137,084	64,996	354,789	7,489	3,052	561,306

Note: Units are in acre-feet (AF).

Source: Los Angeles Department of Water and Power, 2010.

supplies originate. In recent years, LAA supplies have been less than historically normal due to environmental obligations to restore Mono Lake and mitigate dust from Owens Lake. LADWP's ability to export Mono Basin water is now tied directly to the elevation of Mono Lake and flows of various streams that are tributary to Mono Lake. When Mono Lake reaches its target elevation, exports from the Mono Basin can increase from its current level of 16,000 AF per year. Additionally, pursuant to a Memorandum of Agreement between LADWP and the Great Basin Unified Air Pollution Control District, LADWP's ability to export Mono Basin water is tied to a dust mitigation program implemented for Owens Lake. An estimated 55,000 AF of water per year may ultimately be required to sustain the dust mitigation program.

(b) Groundwater

LADWP extracts groundwater from various locations throughout the Owens Valley. LADWP owns extensive property in the Owens Valley and appropriates groundwater from beneath its land for use in the Owens Valley and in Los Angeles. The water is collected and conveyed to Los Angeles via the LAA. The Owens Valley, which is located on the eastern slope of the Sierra Nevada Mountains, encompasses approximately 3,300 square miles of drainage area.

LADWP also extracts groundwater from four local groundwater basins (San Fernando, Sylmar, Central, and West Coast). LADWP holds adjudicated extraction rights in the four local groundwater basins, meaning that the groundwater supplies and quantities have been assigned by the courts to existing users. However, the San Fernando and Sylmar Basins are subject to the judgment in *City of San Fernando vs. City of Los Angeles*. Per that judgment, pumping must be reported to the court-appointed Upper Los Angeles River Area (ULARA) Watermaster. The Central and West Coast Basins are also subject to court judgments. Pumping is reported to DWR, which acts as Watermaster.

The San Fernando Basin, which consists of 112,000 acres of land and comprises 91.2 percent of the ULARA, is the largest of four basins within the ULARA. LADWP has accumulated nearly 374,091 AF of stored water credit in the San Fernando Basin as of October 2006, which can be withdrawn from the basin during normal and dry years or in an emergency, in addition to LADWP's approximately 87,000 AF annual entitlement in the basin. The majority of LADWP's groundwater is extracted from the San Fernando Basin. The Sylmar Basin, located in the northern part of the ULARA, consists of 5,600 acres of land and comprises 4.6 percent of the ULARA. LADWP has an annual entitlement of 3,255 AF from the Sylmar Basin. Annual entitlements to the Central and West Coast Basins are 15,000 AF and 1,503 AF, respectively. Currently, LADWP does not exercise its pumping rights at the West Coast Basin due to localized water quality issues.

As shown in **Table IV.L.1-2**, *Local Groundwater Basin Supply,* from 2008 to 2009, LADWP extracted 68,149 AF from Owens Valley, 53,023 AF from the San Fernando Basin, 868 AF from the Sylmar Basin, and 11,817 AF from the Central Basin. LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported water supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection.

Table IV.L.1-2

Local Groundwater Basin Supply
(In Acre-Feet)

Year	Owens Valley	San Fernando	Sylmar	Central	West Coast
2001-2002	73,349	66,823	1,240	8,639	0
2002-2003	82,281	78,045	3,662	9,811	0
2003-2004	87,726	72,235	2,634	15,907	0
2004-2005	85,820	46,815	1,509	14,870	0
2005-2006	57,412	35,428	1,853	13,395	0
2006-2007	58,621	70,837	4,032	14,416	0
2007-2008	60,337	50,009	2,996	10,754	0
2008-2009	68,149	53,023	868	11,817	0

Note: Groundwater extractions for all basins, except Owens Valley groundwater basin, represent extractions during water year (October through September). Owens Valley groundwater extractions are reported from April to March.

Source: Los Angeles Department of Water and Power, 2010.

(c) Metropolitan Water District of Southern California

MWD is the largest water wholesaler for domestic and municipal uses in southern California. MWD imports a portion of its water supplies from northern California through the State Water Project's California Aqueduct and from the Colorado River through MWD's own Colorado River Aqueduct. As one of 26 member agencies of MWD, LADWP purchases water from MWD to supplement LADWP water supplies from the LAA and local groundwater. All 26-member agencies have preferential rights to purchase water from MWD. As of June 2005, LADWP has a preferential right to purchase 21.33 percent of MWD's total water supply. LADWP will continue to rely on MWD to meet its current and future supplemental water needs.

Based on the water supply planning requirements imposed on its member agencies and ultimate customers, such as the requirements to adopt urban water management plans, water supply assessments and written verifications, MWD has adopted a series of official reports on the state of its water supplies. As described below, MWD has consistently stated that its water supplies are fully reliable to meet the demands of its customers, including LADWP, in all hydrologic conditions through at least 2030.

In March 2003, MWD published a document entitled the *Report on Metropolitan Water Supplies: A Blueprint for Water Reliability* (Blueprint Report). The objective of the Blueprint Report was to provide member agencies, retail water utilities, cities, and counties within the MWD service area with information that may assist in their preparation of UWMP, water supply assessments, and written verifications. MWD utilized the SCAG regional growth forecast in calculating regional water demands for its service area, which is the same method used by the LADWP in its 2010 UWMP. Thus, MWD considered the water demands of LADWP in the Blueprint Report.

The Blueprint Report fully discusses MWD's historical and projected deliveries of Colorado River and SWP water. The conclusion of the Blueprint Report and supplemental information published by MWD, such as its IRP Update and annual Implementation Reports, is that with its current water supply portfolio and planned actions, MWD will have sufficient water to meet the water demands of its customers for the next 20 years.

By comparing total projected water demands and conservatively estimating water supplies over the next 20 years, MWD has found that if its supply programs were implemented under its IRP "[b]ased on water supplies that are currently available, Metropolitan already has in place the existing capability to…[m]eet 100 percent of its member agencies' projected supplemental demands (consumptive and replenishment) over the next 20 years" in average, wet, multiple dry, and single dry years. In multiple dry years, MWD reports that it will "[m]eet 100 percent of its member agencies' projected supplemental demands (consumptive and replenishment) even under the repeat of the worst multiple year drought event over the next 15 years," while in a single dry year it can "[m]eet 100 percent of its member agencies' projected supplemental demands (consumptive and replenishment) even under the repeat of the worst single year drought event over the next 15 years." MWD's additional reserve supplies will provide a "margin of safety to guard against uncertainties in demand projections and risks in fully implementing all supply programs under development."

Summaries of MWD's individual supplies, along with the challenges facing each supply, are presented below. Additionally, described below are specific actions that MWD is taking to meet each of the challenges facing its water supplies. Over the past several decades, MWD has demonstrated that it can adapt to continuous change and address uncertainties in supply by developing a diverse portfolio, setting supply targets, monitoring its progress on a regular basis, and adapting its strategy to meet its targets.

(i) MWD Water Supply

The Colorado River

MWD diverts water from the Colorado River at Lake Havasu on the California/Arizona border and conveys it across the Mojave Desert via the agency's Colorado River Aqueduct to Lake Mathews near Riverside. From there, MWD pumps the water into its feeder pipeline distribution system for delivery to its member agencies throughout Southern California.

MWD possesses the right to divert water from the Colorado River pursuant to a contract with the U.S. Secretary of the Interior under Section 5 of the federal Boulder Canyon Project Act. The Blueprint Report includes a description of MWD's 550,000 AF per year base apportionment water right, along with the Colorado River supply projects that MWD is implementing to maximize the reliability of Colorado River supplies. Following distribution of the Blueprint Report, a Quantification Settlement Agreement (QSA) and other related agreements were approved on October 10, 2003. These agreements address the supplies of all California users of Colorado River water, including MWD. Signing of the QSA and related agreements will allow implementation of the Colorado River supply projects identified in the Blueprint Report, as well as other projects. MWD described the QSA and related agreements and their impact on the reliability of MWD's supplies in its 2006 Integrated Water Resources Plan Implementation Report.

According to MWD, it is expected that its fourth priority apportionment of 550,000 AF per year of Colorado River water will be available every year for the next 20 years. This supply is "expected to be available during all year types, including wet, average, single dry year, and multiple dry year weather."

Current challenges facing MWD's Colorado River supply include risk of continued drought in the Colorado River Basin and pending litigation that may threaten implementation of part or all of the QSA. MWD has been aggressively preparing for these two risks to its Colorado River supply for many years. Its responses to these challenges are described in detail below.

The Colorado River Basin has experienced below-normal runoff for most of the past decade.[20] In 2009, Lake Mead was at its lowest level in over 40 years. As a result, an alternative has been proposed that would introduce new operating and accounting procedures to address the ability of MWD and others to store water in Lake Mead. Despite the challenges of recent Colorado River Basin hydrology, MWD "does not anticipate adverse water supply impacts resulting from the implementation of [the] shortage guidelines because California's 4.4 million acre-foot apportionment has a higher priority than a portion of Arizona and Nevada's apportionments during shortage conditions."

Programs that will help to implement the QSA and meet Colorado River water supply targets and that are currently in operation, close to completion or in progress include: the Imperial Irrigation District ("IID") and MWD water conservation and transfer program; the Coachella and All-American Canal lining projects; the IID and San Diego County Water Authority (SDCWA) water transfer; the Palo Verde Irrigation District land management and crop rotation program; and the Interim Surplus Guidelines adopted by the U.S. Secretary of the Interior. MWD is actively working to implement several of these QSA-related programs. In addition, MWD is participating in the "Intentionally Created Surplus" program to store water in Lake Mead for withdrawal during dry years.[21] During 2006 and 2007, MWD stored 50,000 AF of water in Lake Mead that it had saved under the Palo Verde Irrigation District Land Management and Crop Rotation Program. Collectively, these programs are expected to maintain the reliability of MWD's Colorado River supplies.

MWD's fourth priority apportionment of Colorado River water has been delivered to MWD every year since 1939, in all hydrologic year types. By existing contract, this supply "will continue to be available in

[20] *Integrated Water Resources Plan, Report No. 1373, Updated October 12, 2010. The Metropolitan Water District of Southern California, page ii. http://www.mwdh2o.com/mwdh2o/pages/yourwater/irp/IRP2010Report.pdf.*

[21] *Ibid, page 3-8.*

perpetuity" due to California's senior rights on the Colorado River. MWD has affirmed that "[t]he historical record for available Colorado River water indicates that Metropolitan's fourth priority supply has been available in every year and can reasonably be expected to be available over the next 20 years." Thus, according to MWD, its Colorado River supply is secure through at least 2025.

The second challenge to MWD's Colorado River supplies is the pending litigation concerning the QSA and related agreements. That litigation has taken two forms: (1) a series of lawsuits against the lining of the All-American Canal; and (2) a series of lawsuits which challenge the IID/SDCWA transfer. The All-American Canal litigation has been litigated and resolved in favor of the QSA parties thus, increasing the certainty of MWD's Colorado River supplies since the publication of the Blueprint Report.[22]

Several lawsuits against the IID/SDCWA transfer were brought by the County of Imperial, various landowners within IID and environmental advocacy groups, and have been consolidated in Sacramento County Superior Court. In two of those lawsuits, the County of Imperial sued the State Water Resources Control Board (SWRCB), IID, and SDCWA regarding the legitimacy of the QSA approvals. In November 2004, the Superior Court dismissed those cases with prejudice on the ground that the County had failed to name MWD and the Coachella Valley Water District as necessary and indispensable parties to the actions on a timely basis. The County appealed that decision and the Court of Appeal affirmed the dismissal in 2007, which lifted a stay on the other QSA cases. On January 15, 2010, the Superior Court ruled that the agreement itself was not valid due to environmental obligations to restore the Salton Sea.[23] An appeal is likely to be filed by the IID. In addition, several demurrers have been filed and sustained in the consolidated cases, reducing the number of causes of action pending in the litigation. The water transfer challengers have filed motions for preliminary injunction, which were opposed by MWD and the other QSA parties.[24]

The QSA lawsuits could delay the implementation of programs authorized under the QSA or result in increased costs or other impacts, and it is impossible to predict with absolute certainty how the remaining litigation will be resolved. MWD is actively involved in the litigation and plans to defend the QSA fully to prevent any impacts to its Colorado River supplies.

State Water Project

The State Water Project (SWP) is a water storage and delivery system of reservoirs, aqueducts, power plants, and pumping plants that extend for 600 miles. The main purpose of the SWP is to divert and store surplus water during wet periods and distribute it to areas throughout the state. Other purposes of the SWP include flood control, power generation, recreation, fish and wildlife protection, and water quality management in the Sacramento-San Joaquin River Delta (Delta). The availability of SWP water supply is analyzed in terms of Table A and Article 21 water deliveries. Table A water deliveries represent the schedule of the maximum

[22] *On April 6, 2007, the U.S. Court of Appeals for the Ninth Circuit dismissed the challenge to the lining of the All-American Canal and lifted the court-imposed injunction that for a period of time halted construction. The ruling allowed IID to commence work on the project to conserve water lost by seepage from the existing earthen canal. See Consejo de Desarrollo Economico de Mexicali, A.C. v. United States, 482 F.3d 1157 (2007).*

[23] http://articles.latimes.com/2010/jan/15/local/la-me-water15-2010jan15

[24] *See Notice of Motion and Motion of Putative Class Representatives for Preliminary Injunction or Other Immediate Provisional Relief, Case No. 4353 (Filed October 15, 2007); POWER's and James Albert Abatti's Combined Joinder in the Putative Class Representatives' Motion for Preliminary Injunction or Other Immediate Provisional Relief; Additional Points and Authorities in Support of Preliminary Injunction Based on CEQA, Case No. 4353 (Filed October 16, 2007).*

amount of water that water contractors to the DWR may receive annually from the SWP. There are 29 water contractors who have signed long term contractors with the DWR for a total of 4,173 million acre feet per year. Table A deliveries are not guarantees of annual delivery amounts but are used to allocate individual contractors' portion of the delivery amounts available. Article 21 deliveries refer to Table A deliveries with additional water supplies received only under the following conditions: the water is available only if it does not interfere with Table A allocations and SWP operations; the water is available only when there is excess water in the Delta; the water is only available only when conveyance capacity is not being used for SWP purposes or scheduled SWP deliveries; and the water must be stored by the contractor and not in the SWP system.

MWD possesses a contract with DWR that entitles it to water from the SWP.[25] MWD's share of the total SWP supply is approximately 46 percent based on its contracted Table A amount of 1,911,500 AF per year. This supply is diverted from the Feather River at Lake Oroville, released and conveyed through the Delta and rediverted at the Harvey O. Banks Delta Pumping Plant for conveyance through the California Aqueduct to Southern California and MWD. MWD described and analyzed the reliability of its SWP supplies in the Blueprint Report. MWD estimated the availability of SWP supplies "according to the historical record of hydrologic conditions, existing system capabilities, requests of the state water contractors and SWP contract provisions for allocating Table A, Article 21 and other SWP deliveries to each contractor." MWD estimated that in 2025, it will have 794,700 AF available in multiple dry years, 418,000 AF in a single dry year, 1,523,300 AF in an average year and 1,741,000 AF in a wet year.

Following the Blueprint Report, SWP supplies have been challenged through environmental litigation concerning the Delta. Specifically, the amount of water from the SWP that MWD will be able to supply to Southern California in the near future is uncertain given the recent federal court case *Natural Resources Defense Council, et al. vs. Kempthorne, et al.* (*NRDC*). In spring 2007, various environmental groups sought to halt the operation of water pumps in the Delta to protect the Delta smelt and other endangered fish species living in the Delta. In May 2007, the U.S. District Court invalidated the Biological Opinion issued by the U.S. Fish & Wildlife Service, which had held that the Delta smelt were in "no jeopardy" from operational changes of the State Water Project in the Delta. New Biological Opinions governing the operations of the Delta were issued in 2009 and 2010. On February 24, 2011, U.S. District Court Judge Oliver Wanger finalized a stipulated settlement agreement through June 30, 2011, requiring parties to maintain scientific protections for Delta smelt, as provided by the latest Biological Opinion.[26]

(ii) MWD Programs

Delta Programs

At present, both the California state government and MWD are evaluating Delta operations and options to address Delta smelt impacts and other environmental concerns. The CALFED Bay-Delta Program is a unique collaboration among 25 state and federal agencies that came together with a mission to improve California's water supply and the ecological health of the Delta. In addition, the Governor's Delta Vision Process and the

[25] See *Contract Between the State of California Department of Water Resources and the Metropolitan Water District of Southern California For a Water Supply (November 4, 1960), as amended through Amendment No. 28, available at http://www.swpao.water.ca.gov/wsc/pdfs/MWDSC_O_C.pdf.*

[26] *Consolidated Delta Smelt Cases, Case No. 1:09-cv-407 OWW, Stipulation and [Proposed] Order for Interim Remedy through June 30, 2011, U.S. District Court for the Eastern District of California, filed February 24, 2011.*

Bay-Delta Conservation Plan (BDCP) are both focused on finding and implementing long-term solutions for the Delta. The purpose of the Delta Vision Process is to identify a strategy for managing the Delta as a sustainable ecosystem to continue to support the State's important environmental and economic functions. The Delta Vision Process entails the completion of two work products as prepared by phase. Phase I work product is the Delta Vision Report, which was completed in December 2007. The Delta Vision Report includes long-term strategic solutions for the conflicts in the Delta as recommended by the Delta Vision task force established by Governor Schwarzenegger. Phase II work product is the Delta Strategic Plan, a strategic plan that will assess alternative implementing measures and management practices to implement the Delta Vision Report recommendations. The plan will include modifications to existing land uses and services in the Delta, and will assess governance, funding mechanisms, water resource uses and ecosystem management practices. The Delta Vision Committee published the second draft of its Delta Strategic Plan in July 2008. The final plan was submitted to the Governor and Legislature on December 31, 2008. Additionally, the BDCP allows water contractors, who must comply with the federal and State Endangered Species Acts (ESAs), to work cooperatively to attain incidental take coverage via a habitat conservation plan and natural community conservation plan. Development of this plan is now underway under the aegis of the California Resources Agency, with the appropriate permits and completion of the first public draft of the plan in 2009.[27] The BDCP is guided by a Steering Committee of local water agencies, environmental and conservation organizations, state and federal agencies, and other interest groups. MWD is one of the parties that are drafting the BDCP to provide State and federal ESA coverage for its SWP operations.[28]

Furthermore, in May 2007, MWD's Board adopted a Bay Delta Action Plan as a framework to address water supply risks in the Delta both for the near- and long-term. The near- and mid-term actions outlined in the Delta Action Plan are intended to implement measures to reduce fishery and earth-quake related risks, such as aggressive monitoring, ecosystem restoration, local water supply projects, and emergency preparedness and response plans.

MWD is also focusing on voluntary Central Valley storage and transfer programs to bank MWD's SWP water supplies. In its 2006 Integrated Water Resources Plan Implementation Report, MWD reported that "492,000 acre-feet of dry year yield has been developed in Central Valley storage and transfer programs" and "potential partners and programs have been identified to meet IRP targets." This flexibility will assist MWD in addressing shortages due to drought or court-imposed cutbacks to protect Delta smelt. Further, MWD has employed conjunctive use programs which utilize groundwater basins to store water during wet seasons, which provides a buffer supply that MWD can extract during dry periods. In 2006, MWD developed groundwater storage capable of providing 135,000 AF of dry year supply. MWD continues to seek additional opportunities in southern California to expand groundwater conjunctive use storage programs.

At the regional and local levels, numerous water decision-makers are actively addressing the threats facing the Delta. A review of MWD's resource development programs demonstrates that although SWP supplies are facing challenges and may become more expensive based on the cost of ultimately adopted solutions, MWD's adaptive planning framework, which includes conservation, in-region surface water storage, groundwater storage programs, and local water production within the MWD area, will allow MWD to adapt to changing

[27] *Bay Delta Conservation Plan. http://baydeltaconservationplan.com. Accessed April 25, 2011.*

[28] *Integrated Water Resources Plan, Report No. 1373, Updated October 12, 2010. The Metropolitan Water District of Southern California, page 3-10. http://www.mwdh2o.com/mwdh2o/pages/yourwater/irp/IRP2010Report.pdf.*

conditions and ensure a reliable, diverse water supply to its members agencies that supply water to municipal customers. MWD has spent the past decade increasing the capacity of its reservoirs and its overall water reserve is several times larger than it was during the 1991-1992 drought. Further, actions that are being taken by the CALFED process and the State should enhance reliability of the SWP supplies in the future. Both MWD and State agencies are aware of changing conditions that may impact the SWP and are planning accordingly to ensure a safe, reliable supply of SWP water.

(iii) Additional MWD Actions to Mitigate Supply Risks

In response to recent developments in the Delta, MWD is also engaged in identifying solutions that, when combined with the rest of its supply portfolio, will ensure a reliable long-term water supply for its member agencies. In the near-term, MWD will continue to rely on the plans and policies outlined in its *Regional Urban Water Management Plan, Water Surplus and Drought Management Plan*, and *Integrated Water Resources Plan* to address water supply shortages and interruptions (including potential shut downs of SWP pumps) to meet water demands. These plans are described in detail below.

2010 Regional Urban Water Management Plan (RUWMP). Pursuant to the Urban Water Management Planning Act (discussed below), MWD prepared the 2010 RUWMP, which addresses the future of MWD's water supplies and demand through the year 2035. Campaigns for voluntary conservation, curtailment of replenishment water and agricultural water delivery are some of the actions outlined in the RUWMP to meet future water demand. If necessary, reduction in municipal and industrial water use and mandatory water allocation could be implemented. The RUWMP incorporates much of the actions and policies provided in MWD's *Water Surplus and Drought Management Plan and Integrated Resources Plan.*[29]

Water Surplus and Drought Management Plan (WSDM). In 1999, MWD incorporated the water shortage contingency analysis that is required as part of any urban water management plan into a separate, more detailed plan, called the WSDM. That plan provides policy guidance to manage MWD's supplies and achieve the goals laid out in the agency's Integrated Resources Plan. The WSDM also "identifies the expected sequence of resource management actions that [MWD] will execute during surpluses and shortages to minimize the probability of severe shortages and eliminate the possibility of extreme shortages and shortages allocations." MWD's 10 year WSDM categorizes its ability to deliver water to its customers by distinguishing between surpluses, shortages, severe shortages and extreme shortages. The WSDM's integration of management actions taken during times of surplus and shortages reflects MWD's belief that these actions are interrelated.

For example, MWD's regional storage facilities, such as Lake Skinner, Lake Mathews and Diamond Valley Lake, along with storage capacity available to MWD in Castaic Lake and Lake Perris, provide MWD with flexibility in managing its supplies. MWD's storage supplies and existing management practices allow MWD to mitigate shortages without having to impact retail municipal and industrial demands, except in severe or extreme shortages. MWD's 2010 RUWMP shows its expected ability to meet demands in single dry years by water supply source. For example, in 2015 MWD expects to have 1,048,000 AF in potential reserve and

[29] *Water Surplus and Drought Management Plan, Report No. 1150, The Metropolitan Water District of Southern California, August 1999.*

replenishment supplies, primarily through in-basin storage.[30] In 2035, MWD estimates that it will have 1,407,000 AF in potential reserve and replenishment supplies.[31] Anytime MWD withdraws from storage to meet demands, it is considered to be in a shortage stage. MWD has spent decades building up its storage reserves and groundwater management programs in order to prepare for a variety of shortage conditions. "Each [shortage] stage is associated with specific resource management actions designed to (1) avoid an Extreme Shortage to the maximum extent possible and (2) minimize adverse impacts to retail customers if an Extreme Shortage occurs." MWD notes that the "overriding goal of the WSDM Plan is to never reach Shortage Stage 7, an Extreme Shortage."

In an actual shortage, MWD will take one or more of the following actions: (1) draw on storage out of reservoirs; (2) draw on out-of-region storage in the Semitropic and Arvin-Edison groundwater banks; (3) reduce or suspend long-term seasonal and groundwater replenishment deliveries; (4) draw on groundwater storage programs; (5) draw on SWP terminal reservoir storage; (6) reduce Interruptible Agricultural Water Program (IAWP) deliveries; (7) call on water transfer options contracts; (8) purchase additional water; and (8) reduce imported supplies to its members agencies by an allocation method. MWD clarifies that this list is not in any particular order, "although it is clear that the last action [taken] will be the curtailment of firm deliveries to the member agencies." If MWD were obligated to curtail firm deliveries, it would enforce these shortage allocations using rate surcharges. For example, if deliveries exceed 102 percent of a customer's allotment, the customer will be assessed a surcharge. MWD's actions in 2007 are instructive in demonstrating how the WSDM Plan is implemented in practice.

Prior to the start of calendar year 2007, MWD estimated that water demands would exceed annual supplies (not including stored water) by approximately 300,000 AF.[32] In response, MWD took the following actions: (1) called for water stored in its Central Valley storage programs; (2) initiated replenishment cuts and notified participating agencies with in-basin groundwater storage programs; (3) embarked on a public outreach and media conservation campaign; and (4) announced reductions in IAWP agricultural supplies.

In 1994, MWD established the IAWP to deliver surplus water for irrigation purposes at a reduced rate that is more affordable for certain sectors of the agricultural industry. In exchange for the discounted rate, the MWD General Manager has the authority to reduce IAWP deliveries up to 30 percent before it imposes mandatory allocations to municipal and industrial retail customers under its WSDM.

Due to dry conditions and the pending Delta smelt litigation in 2007 that may affect MWD's supplies, MWD will implement the water shortage actions which it outlined in its WSDM, which include a 30 percent reduction in IAWP deliveries. On October 9, 2007, MWD's Board of Directors announced that it will reduce IAWP deliveries over a 12-month calendar year beginning in January 2008. At that time, MWD has stated that it would not reduce water purchased by its member agencies at the full service rate.

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30 *The Regional Urban Water Management Plan, November 2010. The Metropolitan Water District of Southern California. Table 2-9, Single Dry Year Supply Capability and Project Demands, Repeat of 1977 Hydrology. http://www.mwdh2o.com/mwdh2o/pages/yourwater/RUWMP/RUWMP_2010.pdf.*

31 *Ibid.*

32 *Metropolitan Water District of Southern California, Water Surplus and Drought Management Plan at 3 (June 21, 2007) [Appendix J]. That figure did not include the risk of the SWP supply being restricted to protect Delta smelt, which in fact occurred.*

Additionally, MWD announced a strategic approach in 2008 regarding its WSDM Plan. Besides exercising interruptions to the IAWP, MWD's major strategies are as follows:

- Continue conservation campaign;
- Maximize recovery of water from Central Valley storage and banking programs;
- Purchase additional supplies to augment existing supplies; and
- Develop and implement a shortage allocation plan.

MWD is developing a long-term Drought Allocation Plan that may include reductions of full service deliveries. MWD has used several of these types of initiatives in the past (e.g., during the droughts of 1977-78 and 1989-92), which allowed the agency to meet the needs of its member agencies. At this time, MWD has not released any information regarding the details of its shortage allocation plan. Past experience demonstrates, however, that MWD has always provided its members agencies with sufficient supplies in the face of variable weather conditions, new environmental and water quality regulations, and ever-changing political and legal challenges. In addition, LADWP intends to work within MWD's WSDM Plan to acquire its drought supplies from MWD in the future.

Integrated Resources Plan. MWD first adopted its IRP in 1996. The most recent IRP was completed in October 2010, and it discussed local water supply initiatives (e.g., local groundwater conjunctive use programs) and established a buffer supply to mitigate against the risks associated with implementation of local and imported water supply programs. The 2010 IRP noted that future water supply reliability depends not only upon actions by MWD to secure reliable imported supplies, but also further development of local projects by local agencies.

On October 10, 2006, MWD released its 2006 Integrated Water Resources Plan Implementation Report (2006 Implementation Report) to report on progress toward implementing the targets from the 2003 IRP Update. The 2006 Implementation Report included a summary of each of MWD's water resource development categories: (1) conservation; (2) local resources; (3) Colorado River Aqueduct; (4) SWP supplies; (5) Central Valley storage and transfer programs; (6) in-region groundwater conjunctive use storage; and (7) in-region surface water storage. This recent report concluded that "while changes occur in all resource areas, Metropolitan is able to maintain supply reliability through its diversified water resources portfolio."

MWD supported this conclusion by providing detailed updates for each of its resource categories, restating dry year IRP targets and examining current considerations, changed conditions, implementation strategies and identified programs, implementation challenges and cost information. As can be seen by these ongoing studies, MWD is continually updating its plans to meet ever-changing challenges to its water supplies.

(d) Water Conservation and Recycling

Water conservation and recycling will play an increasing role in meeting future water demands. LADWP has implemented water conservation and recycling programs with efforts underway to further promote and increase the level of these programs. LADWP is committed to supplying a higher percentage of the City's water demand through water conservation and recycling. In addition, as discussed above, the Mayor and LADWP has recently prepared "Securing L.A.'s Water Supply", which is a plan for creating sustainable sources of water for the future of Los Angeles. This plan is an aggressive multi-pronged approach that

includes: investments in state-of-the-art technology; a combination of rebates and incentives; the installation of smart sprinklers, efficient washers and urinals; and long-term measures such as expansion of water recycling and investment in cleaning up the local groundwater supply. These strategies will ensure a reliable water supply for Los Angeles residents and businesses.

(2) Water Demand

The project site is currently vacant and has been graded and enclosed with construction fencing, and therefore, there is currently no water consumption on site. In the past, the project site had been occupied by office and restaurant uses, totaling approximately 130,500 square feet with a separate aboveground parking structure, receiving water services from the existing water infrastructure system. LADWP previously provided water service to these former uses, which required approximately 26,097 gallons per day (gpd) or approximately 29.3 AF per year.[33]

(3) Water Infrastructure

The water infrastructure serving the project site consists of water mains located in adjacent City streets. Currently, there are two 12-inch water mains that join approximately 25-feet north of the property line along Santa Monica Boulevard, with a water capacity of 5,000 gallons per minute at 25 psi residual. A 60-inch water main exists on Century Park East, which will connect to the Century City water system via a new regulator station in the vicinity of Century Park East and Galaxy Way. The new regulator is a priority project that is in the Department's budget and funded for construction to start around early 2012, with completion in June 2012. It will enhance water service for both fire fighting and daily consumption of water.[34]

3. PROJECT IMPACTS

a. Methodology

The water demand for proposed land uses was calculated based on generation factors provided by the City of Los Angeles Department of Public Works. The estimated increase in water demand was then compared to the growth projected for the area in the currently approved 2010 UWMP. The project's water consumption features were also reviewed for consistency with regulatory provisions for water conservation.

The analysis of impacts with regard to water infrastructure capacity is based on information provided by SEC Civil Engineers, in coordination with LADWP. The analysis assesses whether the project's anticipated domestic water demand would be accommodated by the existing water infrastructure would be met. Impacts regarding water sufficiency for fire-fighting are addressed in Section IV.J-1.

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[33] *The calculation of the estimated previous site use is included for information purposes but is not credited as an existing use in the analysis below. The estimate of previous water consumption at the project site assumed 119,500 square feet of office uses, at 0.15 gpd/sq. ft.; a 244-seat restaurant, at 30 gpd/seat; and 12,000 square feet of landscaping, at 0.071 gpd/sq. ft. The generation factors are taken from recent Water Consumption Assessments prepares by the Los Angeles Department of Water and power, which in turn are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates, and the Landscape Water Management Program v1.4 development by Irrigation training and Research Center of California Polytechnic State University, San Luis Obispo.*

[34] *Water Study/Domestic and Emergency Fire, prepared by SEC Civil Engineers, Inc., June 3, 2011. Based on information provided by Los Angeles Department of Water and Power.*

b. Significance Thresholds

Appendix G of the CEQA Guidelines provides a set of screening questions that address impacts with regard to water.

Would the project:

- Require or result in the construction of new water facilities or the expansion of existing facilities, the construction of which would cause significant environmental effects?
- Have sufficient water supplies available to service the project from existing entitlements and resources, or are new expanded entitlements needed?

In the context of these questions from Appendix G of the CEQA Guidelines, the following factors are set forth in the *City of L.A CEQA Thresholds Guide (2006)*, for consideration on a case-by-case basis for evaluation of significance:

- The total estimated water demand for the project;
- Whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout;
- The amount by which the project would cause the projected growth in population, housing, or employment for the Community Plan area to be exceeded in the year of project completion; and
- The degree to which scheduled water infrastructure or project design features would reduce or offset service impacts.

Based on these factors, a project would have a significant impact on water supply if:

WS-1 The City's water supplies would not adequately serve the proposed project or water distribution capacity would be inadequate to serve the proposed uses after appropriate infrastructure improvements have been installed.

c. Project Design Features

The proposed project would be designed and built to achieve the standards of Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council through the incorporation of green building techniques and other sustainability features. As discussed in Section II, Project Description, of this Draft EIR, water conservation would be maximized through the use of water efficient fixtures and appliances (e.g. high efficiency shower head toilets, and a high efficiency/demand water heater system). Specific landscaping features a weather-based irrigation controller with rain shutoff; matched precipitation (flow) rates for sprinkler heads; drip/microspray/subsurface irrigation where appropriate; a minimum irrigation system distribution uniformity of 75 percent; proper hydro-zoning, turf minimization and use of native/drought tolerant plant materials; use of landscape contouring to minimize precipitation runoff; and a separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.

d. Analysis of Project Impacts

The impacts to water supply for the Conventional Parking Option and the Automated Parking Option would be mostly similar, as both provide the same number of residential units and same site activity. The only minor difference in water consumption is that the Automated Parking Option would require slightly less water use, due to the reduced parking area requirements. For the purposes of this analysis, only the Conventional Parking Option is evaluated, which is more conservative in its estimation of the proposed project's required water demand.

(1) Construction

A short-term demand for water would occur during construction activities on-site (i.e., excavation and grading). As the project would occur in various stages over an approximate three year period, construction activities would occur intermittently and would be temporary in nature. Thus, the demand for water supplies for construction activities such as soil watering (i.e., for fugitive dust control), clean up, masonry, painting, and other related activities would be minimal. Overall, construction activities would require minimal water consumption and would not be expected to have any adverse impact on available water supplies or the existing water distribution system. Therefore, impacts associated with short-term construction activities would be less than significant.

(2) Operation

(a) Water Demand

The proposed project would develop the project site with 283 residential units, a 5,881-square foot lounge, a 11,132-square foot gym, and approximately 280,467 square feet of parking. Development of the proposed project would result in an increase in long-term water demand for operational uses, maintenance, and other activities on the project site. The proposed project is estimated to use approximately 58,139 gpd of water equating to 65.1 AF per year with the Conventional Parking Option. **Table IV.L.1-3**, *Estimated Water Use for Proposed Project*, presents the breakdown of proposed land uses and their corresponding estimated water uses. The estimate presented in Table IV.L.1-3 does not take into consideration the project's water conservation measures, which would reduce impacts further.

LADWP's 2010 UWMP provides water demand projections in five-year increments through 2035, which are based on demographic data from the Southern California Association of Governments' (SCAG) 2008 Regional Transportation Plan, as well as billing data for each major customer class, weather, and conservation. **Table IV.L**.1-4, *Water Demand Forecast Through 2035,* shows the projected water demand for the City of Los Angeles through 2035. As shown in Table IV.L.1-4, the City's water demand is estimated to reach 710,760 AF by 2035, which is an increase of 164,989 AF, or 30 percent, from the 2010 consumption.

The 65.1 AF per year increase in water demand generated by the proposed project would constitute approximately 0.04 percent of the City's total increase in water demand through 2035,), or approximately 0.01 percent of the City's projected water demand for 2030 (710,760 AF). The proposed project would fall within the available and projected water supplies of LADWP's 2010 UWMP. Moreover, LADWP has stated they have water available to serve the proposed project and can supply water from the municipal system.[35]

[35] *Service Agreement Letter, from Mr. Hugo A. Torres, Manager – Business Arrangements, Water Distribution Engineering, City of Los Angeles Department of Water and Power, April 11, 2011; as included in the Water Supply Study, by SEC Civil Engineers, dated June 3,*

(Footnote continued on next page)

Table IV.L.1-3

Estimated Water Use for Proposed Project

Land Use	Amount of Development	Water Use Factor (gpd/unit)[a]	Water Use (gpd)	Water Use (AF per year)[b]
1-bedroom Units	42 units	120	5,040	5.6
2-bedroom Units	170 units	160	27,200	30.5
3-bedroom Units	71 units	200	14,200	15.9
Landscaping	33,388 sq. ft.	0.071[c]	2,371	2.7
Landscape Biofilter	5,858 sq. ft.	0.071[c]	416	0.5
Lounge	5,881 sq. ft.	0.08	470	0.5
Gym	11,332 sq ft.	0.25	2,833	3.2
Parking - Conventional	280,467 sq. ft	0.02	5,609	6.3
Total – Conventional Parking			**58,139**	**65.1**

[a] *Based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates Table dated Effective June 5, 1996.*

[b] *Most numbers rounded to the nearest one-tenth decimal.*

[c] *The generation factors are taken from recent Water Consumption Assessments prepared by the Los Angeles Department of Water and power, which in turn are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates, and the Landscape Water Management Program v1.4 development by Irrigation training and Research Center of California Polytechnic State University, San Luis Obispo.*

Source: Water Study/Domestic and Emergency Fire, by SEC Civil Engineers, Inc., June 3, 2011.

Given that LADWP would be able to meet the water demand of the project, as well as the existing and planned future water demands of its service area, impacts associated with long-term operation of the proposed project would be less than significant.

As noted above in its Blueprint Report and Regional UWMP, MWD found that it could meet 100 percent of the imported water demands within its service area in normal, single dry, and multiple dry years; however, as described above, the new Biological Opinions and recent agreements in the *NRDC* case, may impact MWD's ability to supply water in the future to its member agencies in Southern California.[36]

In order to analyze the effect of the decision on MWD, this analysis uses MWD's calculations of its water supply portfolio for 2007, which was a dry year Statewide.[37] As of June 21, 2007, MWD estimated its total

2011, Appendix J.1 of this Draft EIR. Also, letters from Michael Downs, Water Distribution Engineering, City of Los Angeles Department of Water and Power, both letters dated June 24, 2011, included in Appendix J.2 of this Draft EIR.

[36] *"Settlement Maintains Scientific Protections for Delta Smelt and Bay-Delta Estuary," Natural Resources Defense Council, February 24, 2011. http://switchboard.nrdc.org/blogs/dobegi/settlement_maintains_scientifi.html. Accessed May 3, 2011.*

[37] *This analysis is based on several conservative assumptions. First, this analysis assumes that the court's order, which will by its terms only be in effect until the new USFWS Biological Opinion is issued in the fourth quarter of 2008, will be incorporated into the final BiOp and thus have a long-term impact on SWP diversions from the Delta. Second, this analysis uses one of the driest years on record as a baseline to demonstrate the result that SWP cutbacks would have in combination with lower than normal local supplies.*

Table IV.L.1-4

Water Demand Forecast Through 2035[a]
(In Thousand AF Per Year)

Water Use Sector	2005[b]	2010[b]	2015	2020	2025	2030	2035
Single-Family	233,192	196,500	229,115	241,976	249,528	257,693	259,904
Multi-Family	185,536	166,810	179,653	194,724	205,136	216,054	221,912
Commercial/Gov	107,414	130,386	143,081	149,597	153,791	158,628	160,049
Industrial	62,418	19,166	20,524	20,726	20,532	20,408	19,852
Non-Revenue	26,786	32,909	42,421	44,989	46,617	48,380	49,042
Total	615,346	545,771	614,794	652,012	675,604	701,164	710,760

[a] *Based on normal weather conditions and with passive conservation.*
[b] *Actual data reflecting water used for 2005 and 2010, respectively.*

Source: Los Angeles Department of Water and Power, 2010 Urban Water Management Plan, Exhibit 2J.

Colorado River water supplies for the year to be 694,207 AF and its SWP supplies to be 1,484,989 AF, for a total of 2,179,196 AF. MWD's SWP supplies (based on a 60 percent allocation) account for 1,146,840 AF or approximately 53 percent of MWD's total 2007 supplies. Pursuant to the "worst-case" scenario under the court order, this supply could be reduced by up to 25 percent or 286,710 AF, which equates to 13 percent of MWD's total 2007 supplies. If MWD's total supplies were reduced by 13 percent, the agency would likely implement the resource management actions featured in its WSDM Plan, described above. The WSDM Plan defines seven shortage stages that are determined by comparing shortages in imported water supply and water balances in MWD's storage systems. Accordingly, if MWD's supplies are in fact reduced by 13 percent, it will evaluate its annual supplies and water in storage to determine what effect the court decision will have on its existing portfolio, and on that basis decide which WSDM Plan management actions it will take.

During Shortage Stages 1 through 4, MWD will meet its customer's demands by withdrawing water in storage. In Shortage Stages 5 through 7, MWD will exercise an array of water resource management measures, including calling for a reduction in IAWP deliveries as previously described, and ramping up investments in desalination, storage, and recycling projects. MWD would also call options contracts and purchase spot water, exercise storage in its reservoirs and in-basin conjunctive use and call for extraordinary conservation.

Assuming that supplies (including storage) became limited to the point where MWD would be obligated to reduce Tier 1 and Tier 2 deliveries (Shortage Stage 7), it would use its WSDM Plan to allocate water through a calculation on the basis of need. In the long history of MWD, the agency has never allocated water and has not yet released its Drought Allocation Plan. However, if MWD's initiatives and new investments, as described above, proved insufficient to meet demands, MWD has stated that it would reduce deliveries by an equitable allocation method that would consider: (1) impact on regional economy and retail consumers; (2) investments in local resources such as recycling and conservation; (3) population growth; (4) changes or losses in local supplies; (5) investment in MWD's facilities; and (6) participation in MWD's interruptible programs. MWD would enforce these allocations using rate surcharges, described above, rather than absolute restrictions on deliveries.

Additionally, restoring the Delta's water capacity is a high priority for MWD, the Governor, and the California Legislature. Extensive plans are already underway for improving the operation of the Delta's water pumps while also protecting the Delta smelt and other endangered fish species. In June 2007, MWD's Board of Directors adopted an Action Plan to implement immediate short- term actions to stabilize the Delta and mid-term and long-term actions to find an ultimate solution to the Delta's sustainability. The Governor has made the Delta and statewide water policy a high priority by establishing the Delta Vision Process and the Bay-Delta Conservation Plan, and the California Legislature is using SB 27 to find a long-term water supply solution for the Delta.

Along with MWD's water management and reliability initiatives, LADWP is committed to providing a reliable water supply for the City as provided in its plan "Securing L.A.'s Water Supply". LADWP is planning to achieve this goal by expanding its water conservation efforts through public education, installing high efficient water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge.

The proposed project would implement project design features, and be compliant with the City's recommended water conservation measures. Implementation of these project design features would reduce water consumption estimates for the proposed project further, thereby reducing the demand on City supplies. Furthermore, the Applicant will continue to coordinate with LADWP to ensure adequate water supply to the project.

(b) Water Infrastructure

The Applicant would be responsible for providing the necessary water infrastructure on the project site, as well as any extensions to connect the project site to existing water lines in the area. The proposed project would connect to the existing 12-inch water mains located along Santa Monica Boulevard. With regard to domestic water, these mains have adequate capacity to accommodate the water demand increase of 58,139 gpd that would be generated by the proposed project, with the Conventional Parking.[38] Implementation of the project's water conservation measures would reduce this demand further.

(3) Global Warming and Climate Change

Global warming and climate change should be considered in assessing water supply in California. Potential impacts of climate change on California's water resources include changes in both water and air temperature, changes in precipitation patterns, and changes in sea levels that could increase pressure on Delta levees. The impact of climate change on California's water supply has already been the subject of study. In response to Governor's Executive Order S-3-05, DWR prepared a July 2006 report entitled "Progress on Incorporating Climate Change into Management of California's Water Resources," which found that climate change may have a significant effect on California's future water resources and demand. This report also examined the potential impacts of selected climate change scenarios on operations of the SWP and Central Valley Project, Delta water quality, flood management, and evapotranspiration. Potential issues

[38] *Service Agreement Letter, from Mr. Hugo A. Torres, Manager – Business Arrangements, Water Distribution Engineering, City of Los Angeles Department of Water and Power, April 11, 2011; as included in the Water Supply Study, by SEC Civil Engineers, dated April 13, 2011, Appendix J.1 of this Draft EIR. Also, letters from Michael Downs, Water Distribution Engineering, City of Los Angeles Department of Water and Power, both letters dated June 24, 2011, included in Appendix J.2 of this Draft EIR.*

include a reduction of Sierra snow pack and seasonal water storage; increased rain and less snow impacting supply reliability and hydropower generation; increased variable precipitation and extreme weather events; and rising sea levels.[39]

As described above, in May 2009, DWR prepared a follow-up report entitled "Using Future Climate Projections to Support Water Resources Decision Making in California," which presents an overview of the advances that DWR has made since the 2006 report toward using future climate projection information to support decision making by quantifying possible impacts to water resources for a range of future climate scenarios.[40] In December 2010, DWR prepared a survey which presents summaries of 13 different reports and studies prepared by DWR addressing climate change entitled "Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report." Although DWR was one of the early leaders in including climate change analysis in its planning studies and reports, it does not currently have a standard framework or a set of recommended approaches for considering climate change in its planning studies.[41]

As indicated above and as reflected in the various DWR reports and technical memoranda prepared in response to Governor's Executive Order S-3-05, there are substantial uncertainties regarding the effects of global warming on California's water supplies. Although experts agree that the earth's atmosphere has warmed over the last century and will likely continue to warm in the future, how this warming will quantitatively affect future water supplies, and specifically, how this warming will affect SWP supplies remains speculative. Due to the global nature of this issue, the potential effects of global climate change on water supply related to the project are qualitatively discussed below as part of the cumulative impact analysis.

(4) Consistency with Regulatory Framework

(a) California Urban Water Management Plan Act

LADWP is consistent with the California Urban Water Management Plan Act. It is consistent with LADWP's approved 2010 UWMP. The proposed project is within the range of development anticipated in the UWMP, which indicates that LADWP will be able to meet future demand for water.

(b) Senate Bill 610, Senate Bill 221 and Senate Bill 7

As indicated above, the proposed project would not be subject to the requirements of SB 610 as it does not include the development of 500 residential units, or the development of a project requiring an amount of water equivalent to or greater than that required by a 500 dwelling unit project. Additionally, the proposed project would not be subject to the requirements of SB 221 because it would contain less than 500 dwelling units, and is located within an urbanized area and has been previously developed for urban uses. The proposed project will be in the service areas of the respective water suppliers who must also abide by the

[39] *"Progress on Incorporating Climate Change into Management of California's Water Resources," July 2006, California Department of Water Resources, pages 1-3 to 1-4.*

[40] *"Using Future Climate Projections to Support Water Resources Decision Making in California," May 2009, California Department of Water Resources, page 2.*

[41] *"Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report," California Department of Water Resources, December 2010, page v.*

water conservation and planning goals of SB 7, to reduce the per capita water consumption 20 percent by 2020 statewide.

(c) California Code of Regulations

The proposed project would meet or exceed the water efficiency requirements set forth by Title 20 of the CCR through incorporation of the City's recommended water conservation measures, the project's design features, which are generally more stringent than the requirements set forth by Title 20 of the CCR. As such, the proposed project would be consistent with Title 20.

(d) City of Los Angeles Ordinance Nos. 172,075, 163,532, and 170,978

The proposed project would meet or exceed the water efficiency requirements set forth in Ordinance Nos. 172,075, 163,532 and 170,978 through incorporation of the City's recommended water conservation measures, including those listed a project design features, above, which are generally consistent or more stringent than the requirements set forth in these ordinances. As such, the proposed project would be consistent with applicable regulations.

(e) Los Angeles Department of Water and Power Urban Water Management Plan

As discussed above, the projected water demand for the proposed project would fall within LADWP's projected future water demands set forth in their 2005 UWMP, and the proposed 2010 UWMP. In addition, the UWMP indicates that water would be available to meet the water demand of the projected service area through 2030.

4. CUMULATIVE IMPACTS

a. Water Demand

As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the CWC) within its service area. The types of projects subject to the requirements of SB 610 tend to be larger projects (i.e., residential projects with at least 500 dwelling units, shopping centers or business establishments employing more than 1,000 persons or having more than 500,000 square feet of floor space, commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet of floor space, etc.) that may or may not have been included within the growth projections of the UWMP. The WSA for such projects, in conformance with the UWMP, evaluates the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed. In addition, as described above, SB 221 requires that for residential subdivisions with 500 units or more that are in non-urban areas, written verification from the service provider (i.e., LADWP) be submitted indicating sufficient water supply is available to serve the proposed subdivision, or the local agency shall make a specified finding that sufficient water supplies are or will be available prior to completion of the project.

Section III of this Draft EIR identifies 40 related projects located in the City of Los Angeles and City of Beverly Hills that are anticipated to be developed within the vicinity of the project site. Of these 40 projects, 18 are located within the City of Los Angeles and thus within the service area of LADWP. The City of Beverly Hills has their own water service provider, and therefore, related projects within Beverly Hills were not included in this cumulative analysis. These 18 related projects would cumulatively contribute, in conjunction with the proposed project, to water demand in the project area. As shown in **Table IV.L.1-5**, *Estimated Cumulative Water Demand*, related projects would have an average daily water demand of approximately 753,389 gpd or 824.1 AF per year. The project in conjunction with related projects would yield a total average water demand of approximately 793.389 gpd equating to 889.2 AF per year with the project. As stated above, LADWP's 2010 UWMP projects yearly water demand to reach 710,760 AF by 2035, which is an increase of 30 percent from 2010 water demand. With the anticipated water demand increase of 793,528 gpd or 889.2 AF per year from the development of the proposed project and related projects, the demand for water would fall within the available and projected water demand of LADWP's 2010 UWMP.

Table IV.L.1-5

Estimated Cumulative Water Demand

Land Use	Amount of Development	Water Use Factor (gpd/unit)[a]	Water Use (gpd)	Water Use (AF per year)
Dwelling Units [b]	1,470	160	235,200	263.6
Commercial/Retail	788,600	0.08	63,088	70.7
Office	913,530	0.15	137,030	153.8
Hotel	374	130	48,620	54.5
High School/Trade School[c]	875	12	10,500	11.8
Restaurant	15,400	0.30	4,620	5.2
Synagogue/Church [d]	100	4	400	0.5
Museum Special Event [e]	100,000	0.80	80,000	89.7
Gym	16,800	0.80	13,440	15.0
Outdoor Water Use [f]			142,491	159.7
Related Projects Total			735,389	824.1
Proposed Project				
(Conventional Parking)			**58,139**	**65.1**
Grand Total			**793,528**	**889.2**

[a] *Water use factor is based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates.*
[b] *Dwelling units were based on the assumption of 2 bedrooms per unit.*
[c] *For the high/trade schools, the rates were the same, which is 12 per student.*
[d] *For synagogue, the rates were the same as for chapels and churches, which is 4 per seat.*
[e] *For the Museum of Tolerance Special Events Pavilion, the rate was based on the assumption that the use would be similar to a banquet hall or ballroom, which is 800 gallons per 1,000 square feet.*
[f] *Outdoor water use was calculated using a combination of the water use from 18% of dwelling units (54,950.4) plus 28% of commercial units (17,664.6), for a total of 72,615.*

Source: PCR Services Corporation, 2011.

The City of Los Angeles is faced with various ongoing challenges in securing its future water supplies due to among other things droughts, environmental restrictions, and climate change. However, as discussed above,

in response to uncertainties regarding water supply, the Mayor and LADWP released a Water Supply Action Plan entitled "Securing L.A.'s Water Supply" dated May 2008. The plan will serve as a blueprint for creating sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies. The plan calls for the City to meet this future increased demand through water conservation and water recycling. LADWP is planning to achieve these goals by expanding its water conservation efforts through public education, installing high efficient water fixtures, providing incentives, and expanding the City's outdoor water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge. Furthermore, given that the UWMP plans and provides for water supplies to serve existing and projected needs, including those of future growth and development as may occur through related projects, and that the requirements of SB 610, SB 221 and SB 7 provide means to ensure that the water supply needs of large development projects are carefully considered relative to LADWP's ability to adequately meet future needs, it is anticipated that LADWP would be able to supply the demands of the proposed project and related projects through the foreseeable future. In addition, compliance with the City's recommended water conservation measures would reduce the water consumption estimates of the proposed project and related projects, thereby reducing the demand on City supplies.

In sum, LADWP would have adequate amounts of water to meet future water demands for the service area with the addition of the proposed project and related projects, and no significant cumulative impacts related to water demand would occur.

b. Water Infrastructure

Development of the proposed project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. However, each related project would be subject to discretionary review to assure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, LADWP as well as the City of Los Angeles Department of Public Works conducts ongoing evaluations to ensure facilities are adequate. As indicated above, a new regulator station is currently funded with construction expected to be completed in June of 2012.[42] This infrastructure improvement will greatly enhance water service capacity for a multitude of new projects. Therefore, cumulative impacts on the water infrastructure system would be less than significant.

c. Global Warming and Water Supply

As indicated above, there are complex physical, chemical, and atmospheric mechanisms involved in global climate change that make it difficult to predict what the effects of global climate change will be, particularly at a State or local level. Due to this unpredictability, the secondary affects that global climate change may have on water supplies for a given region is even more difficult to predict.[43] The science on global warming is still

[42] *City of Los Angeles Department of Water and Power, Letter regarding the design and installation schedule for a new pressure regulator station, from Mr. Ronald O. Nichols, General Manager, March 23, 2011; as included in the Water Supply Study, by SEC Civil Engineers, dated June 3, 2011, AppendixJ.1of this Draft EIR.*

[43] *The Los Angeles Superior Court issued a statement of decision (Case No. BS 084677) on August 15, 2007 which upheld a local agency's Return to a Writ of Mandate and Final Additional Analysis to an EIR for a local development project (California Oak Foundation v. City of Santa Clarita (2005) 133 Cal.App.4th and struck down certification of the EIR for the Gate King project because it did not address legal uncertainties surrounding a water transfer. Among other issues, the statement of decision dealt with the analysis of the potential impact of global warming on water supplies and concluded that it was proper that no quantification of the impact of climate change on the reliability of SWP water was prepared because DWR has indicated in its reports that quantification is premature. The statement of*

(Footnote continued on next page)

evolving and has not reached a point where it can be quantified and incorporated into delivery projections of the SWP. Furthermore, policy recommendations on how to incorporate potential changes to water supply due to climate change into water resource planning and management are still being developed. Therefore, consistent with studies prepared by DWR, it is considered premature to make an assessment of impacts under CEQA of how climate change will affect water availability for the project.

5. MITIGATION MEASURES

Based on the analysis above, the proposed project would not result in significant impacts related to domestic water supply. No further mitigation measures would be required.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

As indicated above, the proposed project's impacts to water supply and infrastructure would be less than significant.

decision indicates that DWR, with the most expertise on water supply in California, has determined that the science on global warming has not reached a point where it can be quantified and incorporated into delivery projections of the SWP. Accordingly, the statement of decision also concludes that the City is in no better position to quantify the effects of global warming on the reliability of SWP water and that it is not required to do so under CEQA.

IV. ENVIRONMENTAL IMPACT ANALYSIS
L. UTILITIES
2. WASTEWATER

1. INTRODUCTION

This section addresses potential impacts on existing wastewater infrastructure and treatment facilities and whether sufficient capacity is available to serve project demand. Consistency with relevant goals and ordinances is also discussed. The following analysis is based in part on a Sewer Study prepared by SEC Civil Engineers, which is contained in Appendix J.3 of this Draft EIR.[1]

2. ENVIRONMENTAL SETTING

a. Regulatory Framework

(1) City of Los Angeles General Plan Framework

Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City including wastewater collection and treatment. Goal 9A is to provide adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities.

(2) City of Los Angeles Municipal Code (LAMC)

The LAMC includes regulations that allow the City to assure available sewer capacity for new projects and fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Review (SCAR) when any person seeks a sewer permit to connect a property to the City's sewer collection system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per day. A SCAR is an analysis of the existing sewer collection system to determine if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

LAMC Section 64.11.2 requires the payment of fees for new connections to the sewer system to assure the sufficiency of sewer infrastructure. New connections to the sewer system are assessed a Sewerage Facilities Charge. The rate structure for the Sewerage Facilities Charge is based upon wastewater flow strength, as well as volume. The determination of wastewater strength for each applicable project is based on City guidelines for the average wastewater concentrations of two parameters, biological oxygen demand and suspended solids, for each type of land use. Fees paid to the Sewerage Facilities Charge are deposited in the City's Sewer Construction and Maintenance Fund for sewer and sewage-related purposes, including but not limited to industrial waste control and water reclamation purposes.

[1] *Wastewater/Sewer Study, S.E.C. Civil Engineers, Inc., June 3, 2011.*

In addition, the City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards (Bureau of Engineering Special Order No. SO06-0691). Per the Special Order, lateral sewers, which are sewers 18 inches or less in diameter, must be designed for a planning period of 100 years. The Special Order also requires that sewers be designed so that the peak dry weather flow depth during their planning period shall not exceed one-half the pipe diameter.[2]

b. Existing Conditions

(1) Wastewater Generation and Infrastructure

Wastewater in the City of Los Angeles is collected and conveyed via the Hyperion Treatment Conveyance System (described in further detail below), which is owned and operated by LADPW.

The project site is currently vacant and has been graded and enclosed with construction fencing, and therefore, there is currently no wastewater generated from the site. In the past, the site was occupied by office and restaurant uses, totaling approximately 130,500 square feet with a separate aboveground parking structure, receiving sewer service from existing LADPW infrastructure. These former uses generated an estimated 21,250 gpd of wastewater with an estimated peak flow of 36,125 gpd.[3]

The City of Los Angeles Department of Public Works maintains the sewer collection and distribution system located throughout the city with sewer facilities that would serve the proposed project. The project site is served by the 27 inch Westwood Relief Sewer in Century Park East which continues southerly to the Hyperion Treatment Plant, in Playa Del Rey.

(2) Wastewater Treatment

All wastewater generated within the City of Los Angeles and LADPW's service area is transported through the Hyperion Treatment Conveyance System to one of four wastewater treatment plants owned and operated by LADPW: the Hyperion Treatment Plant (HTP) in Playa del Rey, Donald Tillman Water Reclamation Plant (TWRP) in Van Nuys, Los Angeles-Glendale Water Reclamation Plant (LAGWRP) in Los Angeles, or Terminal Island Treatment Plant (TTP) in Los Angeles. The Hyperion Treatment Conveyance System includes treatment plants, outfalls, and numerous sewer connections and major interceptors. The current treatment capacity of the entire Hyperion Treatment Conveyance System is approximately 550 mgd (consisting of 450 mgd at HTP, 80 mgd at TWRP, and 20 mgd at LAGWRP).[4] The Hyperion Treatment Conveyance System has a current average dry water flow of approximately 410 mgd (consisting of 360 mgd at HTP, 38 mgd at TWRP, and 12 mgd at LAGWRP), leaving approximately 140 mgd of available treatment capacity.

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[2] *City of Los Angeles Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.*

[3] *This estimate of previous site sewer generation is included for information purposes. It is not credited in the analysis of the project's sewer impacts below. The estimate is based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates Table, dated Effective June 5, 1996. Assuming, 119,500 square feet of office uses, at 0.15 gpd/sq. ft.; a 244 seat restaurant, at 0.30 gpd/seat; and 65,000 square feet of auto parking, at 0.02 gpd/sq. ft.*

Wastewater generated within the City of Los Angeles is conveyed to and treated at HTP. HTP serves a total of 600 square miles in the City of Los Angeles and within other jurisdictions outside the City of Los Angeles. HTP is the City of Los Angeles' oldest and largest wastewater treatment facility and provides preliminary, primary, and secondary treatment processes, and also treats flows bypassed from the TWRP and LAGWRP. As stated above, HTP has an existing treatment capacity of 450 mgd and an average dry water flow of approximately 360 mgd, leaving approximately 90 mgd of treatment capacity available.[5]

Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into the Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. HTP has two outfalls that presently discharge into the Santa Monica Bay (a one-mile outfall pipeline and five-mile outfall pipeline). Both outfalls are 12 feet in diameter. The one-mile outfall pipeline is 50 feet deep and is only used on an emergency basis. The five-mile outfall pipeline is 187 feet deep and is used to discharge secondary treated effluent on a daily basis. It was last inspected in November 2006.[6] Effluent to Santa Monica Bay from HTP has historically had effects on water quality. However, according to the City of Los Angeles Environmental Monitoring Division (EMD), since HTP's full secondary effluent discharge began in 1999 with a reduction in biosolids to Santa Monica Bay, water quality has improved with an increase in the number of species and the biodiversity in Santa Monica Bay. HTP effluent is required to meet the Regional Water Quality Control Board's (RWQCB) requirements for a recreational beneficial use, which imposes performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's National Pollution Discharge Elimination System (NPDES) permit. Accordingly, HTP effluent to Santa Monica Bay is continually monitored by the EMD to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay.

(a) Integrated Resources Plan

In November 2006, the City of Los Angeles Integrated Resources Plan (IRP), developed by the LADPW, and its corresponding Final EIR, were approved by the Los Angeles City Council.[7] The IRP was developed to incorporate greater efficiency for future, water, wastewater, and runoff management in the City and surrounding service areas. It is a multi-phase program that will result in the establishment of Citywide, regional, departmental and public and private partnerships. The IRP accounts for projected needs and sets forth improvements and upgrades to wastewater systems, recycled water systems, and runoff management programs in the City of Los Angeles through the year 2020. The IRP includes wastewater flow projections based on population projections from the Southern California Association of Governments (SCAG). As shown in **Table IV.L.2-1**, *Population and* Average Dry Water Flow *Projections for Hyperion Treatment Conveyance System Service Area*, the forecasted population for the Hyperion Treatment Conveyance System service area

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[4] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan - Executive Summary, December 2006". Website: http://www.lacity.org/san/irp/, accessed May 2011. Also, Department of Public Works, "Wastewater, About Wastewater, Facts and Figures," http://www.ci.la.ca.us/san/wastewater/factsfigures.htm; accessed May 2011.*

[5] *Department of Public Works, "Wastewater, About Wastewater, Facts and Figures," http://www.ci.la.ca.us/san/wastewater/factsfigures.htm; accessed May 2011.*

[6] *City of Los Angeles Department of Public Works. "Hyperion Treatment Plant 5-Mile Outfall Inspection and Diversion to 1-Mile Outfall Fact Sheet, November 2006". http://www.lasewers.org/treatment_plants/hyperion/5-mile-outfall/hyperion_outfall_inspection_facts.pdf, accessed May 2011.*

[7] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan - Executive Summary," December 2006. Website: http://www.lacity.org/san/irp/, accessed April 2011.*

Table IV.L.2-1

Population and Average Dry Water Flow Projections for Hyperion Treatment Conveyance System Service Area

	2000	2005	2010	2015	2020
SCAG Population	4,138,567	4,331,109	4,485,054	4,641,928	4,854,483
Average Dry Water Flow (in mgd)	443.1	461.8	477.3	492.3	511.5

Source: City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan", December 2006.

in 2010 was approximately 4,485,054 residents, approximately 4,641,928 residents in 2015, and approximately 4,854,483 residents in 2020. The wastewater flow projections account for planned levels of water conservation and assumed levels of collection system maintenance and rehabilitation. The average dry water flow in 2010 was estimated to be approximately 477.3 mgd, in 2015 approximately 492.3 mgd, and in 2020 approximately 511.5 mgd, with each amount falling well within the current system-wide treatment capacity of 550 mgd.

Despite the current and projected availability of system-wide treatment capacity, the IRP includes several proposals for improvements, additions, and expansions within the Hyperion Treatment Conveyance System to maintain adequate service over time. As HTP is connected with the Hyperion Treatment Conveyance System and its components including, other treatment plants (TWRP and LAGWRP), connecting outfalls, and numerous sewer connections and major interceptors, current and future implementation of the IRP and its corresponding expansion projects will support continued availability of capacity at HTP. As part of the adopted IRP, proposed improvements include the following:[8]

- Expansion of HTP biosolids handling capacity (e.g., new digesters and truck loading facility);
- Addition of secondary clarifiers at HTP to meet existing treatment requirements;
- Expansion and upgrade of TWRP capacity to 100 mgd with advanced treatment;
- Addition of 60 million gallon wastewater storage at TWRP;
- Construction of a five million gallon diurnal storage for wastewater and a five million gallon recycled water storage at LAGWRP, and maintain the option to upgrade LAGWRP to advance treatment;
- Construction of new Glendale Burbank Interceptor Sewer (GBIS);[9]
- Construction of new North East Interceptor Sewer (NEIS) Phase 2; and
- Construction Valley Spring Lane Interceptor Sewer (VSLIS).

[8] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan, Volume 5: Adaptive CIP," December 2006. Website: http://www.lacity.org/san/irp/, accessed April 2011.*

[9] *The GBIS development process had been delayed due to decertification of its EIR. The Los Angeles City Council certified a new EIR and reapproved the project on November 9, 2010. Council File # 10-2389*

Implementation of the IRP would result in an increased treatment capacity in the Hyperion Treatment Conveyance System. The treatment capacity would increase by 20 mgd for a total of 570 mgd (TWRP would have a new capacity of 100 mgd, while HTP's capacity of 450 mgd and LAGWRP's capacity of 20 mgd would stay the same). Adoption of the IRP also includes the Adaptive Capital Improvement Program (CIP) which includes the anticipated capital, operation and maintenance, project timing, and implementation strategy for tracking and monitoring triggers. As discussed in the IRP and CIP and based on LADPW information, projects have been completed within all the treatment plants and sewer lines and additional on-going improvements have been proposed in order to continually provide services and meet the wastewater needs of the City of Los Angeles.

With implementation of the IRP, LADPW and Bureau of Sanitation expects to provide ample wastewater treatment services to the City of Los Angeles and contracting cities through 2020. Furthermore, projections show that adequate wastewater treatment services are expected to be available through 2025.[10]

3. PROJECT IMPACTS

a. Methodology

The wastewater generation of the proposed project was estimated using wastewater generation factors provided by LADPW. The project's estimated increase in wastewater flow was then compared to the existing conditions to assess the capacity of the existing sewer system and the ability of the system to accommodate the additional flows. In order to evaluate treatment capacity, the project's estimated wastewater generation and projected average dry water flow is compared with the available treatment capacity within the Hyperion Treatment Conveyance System for 2015, and 2020 for a thorough and conservative analysis as the proposed project is expected to be completed in 2016. Cumulative wastewater generation is also compared with the available capacity of the Hyperion Treatment Conveyance System using the average dry water flow.

b. Significance Thresholds

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

Would the project:

- Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
- Require or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which would cause significant environmental effects?
- Result in a determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

[10] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan - Executive Summary, December 2006". Website: http://www.lacity.org/san/irp/, accessed April 2011.*

In the context of these questions from the CEQA Guidelines, the *City of L.A. CEQA Thresholds Guide (2006)* states that a project would normally have a significant wastewater impact if:

WS-1 The project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained; or

WS-2 The project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

c. Project Design Features

As discussed in Section IV.J.1, Water Supply, of this Draft EIR, water conservation would be maximized through the use of water efficient fixtures, as well as the implementation of project design features compliant with the City's recommended water conservation measures. These water conservation measures would in turn reduce the amount of wastewater generated by the proposed project. Sewer service to the project site would be provided via a new 8-inch sewer-line in Santa Monica, extending from the northwest corner of the project site, to the existing 27-inch main-line in Century Boulevard East.

d. Analysis of Project Impacts

Impacts of the proposed project on wastewater would be the same for the Conventional Parking Option and the Automated Parking Option as the approach to parking would not affect wastewater generation. Therefore, the discussion of project impacts below is applicable to both parking options.

(1) Construction

During construction of the proposed project, a negligible amount of wastewater would be generated by construction staff. It is anticipated that portable toilets would be provided by a private company and the waste disposed of off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

(2) Operation

(a) Wastewater Generation and Infrastructure

The proposed project would develop the project site with 283 residential units, an approximately 5,881-square foot lounge, an approximately 11,132-square foot gym, and approximately 280,844 square feet of parking. Based on wastewater generation factors provided by LADPW, the proposed project is estimated to generate approximately 55,352 gpd (0.055 mgd) of wastewater on an average day and approximately 94,098 gpd (0.094 mgd) of wastewater on a peak day, as shown in **Table IV.L.2-2**, *Estimated Wastewater Generation for Proposed*

Table IV.L.2-2

Estimated Wastewater Generation for Proposed Project

Land Use	Amount of Development	Wastewater Generation Factor (gpd/unit)[a]	Average Wastewater Generation (gpd)	Peak Wastewater Generation (gpd)[b,c]
1-bedroom Units	42 units	120	5,040	8,568
2-bedroom Units	170 units	160	27,200	46,240
3-bedroom Units	71 units	200	14,200	24,140
Lounge	5.881 sq. ft.	0.08	470	800
Gym	11,332 sq. ft.	0.25	2,833	3
Parking	280,467 sq. ft.[d]	0.02	5,609	9,535
Total			**55,352**	**89,287**

[a] *Based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates Table, dated Effective June 5, 1996. The sewer generation rates do not account for water conservation measures that would be implemented by the project; and that would reduce the actual wastewater generation.*

[b] *Estimated to be 1.7 times the average daily wastewater generation.*

[c] *Generation estimates rounded to the nearest whole number.*

[d] *Parking is not a use that would necessarily generate wastewater. However, DPW includes wastewater generation rates for parking, and to conservatively cover the potential for associated fixtures in the garage, parking is included in the analysis. The area shown for the amount of parking is that associated with the Conventional Parking Option which is greater than the Automated Parking Option and therefore provides a conservative assumption.*

Source: Wastewater/Sewer Study, by SEC Civil Engineers, Inc., June 3, 2011.

Project. This estimate is conservative as the project's water conservation features would reduce the wastewater generation further.

As indicated above, the project's wastewater would be conveyed via a new 250 foot long, 8-inch line to an existing 27-inch line on Century Boulevard East. LADPW has reviewed the project features and expected waste water generation and compared that to the sewer infrastructure and capacity available to serve the project site. On the basis of that evaluation, included in the Wastewater Report, Appendix J.3 of the Draft EIR, there is sufficient capacity to serve the proposed project.[11] Since, the project requires construction of a new off-site line to meet project needs, and connection to a sewer main-line, Mitigation Measure L.2-1, is included below to ensure that the project infrastructure is consistent with the LADWP evaluation regarding capacity of the sewer network to meet project needs, and City regulations and standards for the provision of new sewer facilities.

(b) Wastewater Treatment

The wastewater generated by the proposed project would ultimately be conveyed via the Hyperion Treatment Conveyance System to HTP. The average dry water flow for the Hyperion Treatment Conveyance System service area is projected to be approximately 492.3 mgd in 2015, and 511.5 mgd in 2020. These forecasted increases in wastewater flows without the proposed project are well within the current Hyperion Treatment Conveyance System capacity of 550 mgd. According to these projections and based on existing

[11] *Sewer Capacity Availability Request (SCAR) Los Angeles Department of Public Works, dated April 6, 2011.*

capacity, the Hyperion Treatment Conveyance System would still have a capacity of 58 mgd (or 10 percent) in 2015, and 39 mgd (or 7 percent) in 2020.

The proposed project's wastewater generation would contribute an average wastewater flow of 55,352 gpd (0.055 mgd) and a peak flow of 94,098 gpd (0.094 mgd), based on the estimate shown in Table IV.L.2-2. The actual amount would be lower due to water conservation features that would reduce wastewater generated at the project site. The amount estimated in Table IV.L-2 could be easily accommodated within the projected available capacity of the Hyperion Treatment Conveyance System for 2015 (58 mgd), and 2020 (39 mgd) without considering the 20 mgd increase in capacity to 570 mgd expected with implementation of the IRP improvements. The increase would not significantly impact the projected average dry water flow for 2015 and 2020. In addition, the wastewater generation estimate uses standard DWP generation rates and does not account for reductions in wastewater that would occur with implementation of project design features compliant with the City's recommended water conservation measures presented in Section IV.L.1, Water Supply, of this Draft EIR. Furthermore, development of the project is consistent with the planned growth for the site under current zoning regulations. Therefore, development of the project site is within the anticipated growth projections taken into account by service providers such as LADPW. As such, the increase in wastewater flows generated by the proposed project would have a less than significant impact on wastewater treatment facilities.

In addition, effluent conveyed to HTP would not have a significant affect on the Santa Monica Bay as HTP continually monitors all effluent, currently meets applicable water quality standards, and is required to comply with water quality standards established for beneficial uses.

(3) Consistency with Regulatory Framework

(a) City of Los Angeles General Plan Framework

As previously discussed, Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City including wastewater collection and treatment to ensure the provision of adequate wastewater collection and treatment capacity for the City and in basins tributary to City-owned wastewater treatment facilities. As indicated above, the project would be served with adequate infrastructure and treatment capacity. Therefore, the project would be consistent with the City's General Plan Framework.

(b) City of Los Angeles Municipal Code

The Applicant would be subject to LAMC Section 64.15 requiring a determination by LADPW that there is allotted sewer capacity available for the proposed project. As previously discussed, LADWP has determined that it has sufficient capacity in the Century Boulevard East sewer line to accommodate the proposed project.[12] Therefore, the project would be in compliance with LAMC Section 64.15.

The Applicant would also be subject to City Ordinance LAMC 64.11.2, requiring the payment of wastewater connection fees based upon the strength of the project's wastewater flow in addition to its volume. These

[12] *City of Los Angeles, Sewer Capacity Availability Request (SCAR), Capacity stated as "Available," approval date April 25, 2011.*

fees would be paid prior to the project's connection to the City's sewer system. Therefore, with the payment of such fees, the project would be in compliance with LAMC 64.11.2.

Design of the project's new 8-inch line would be subject to Bureau of Engineering standards and reviewed for adequacy by the LADWP assuring consistency with the City's sewer design requirements.

4. CUMULATIVE IMPACTS

Section III, General Description of Environmental Setting, of this Draft EIR identifies 40 related projects located in the City of Los Angeles (18 projects) and Beverly Hills (22 projects) that are anticipated to be developed within the vicinity of the project site. Because wastewater within both of these cities ultimately ends up at HTP, all 40 related projects were included in this cumulative analysis. These 40 related projects would cumulatively contribute, in conjunction with the proposed project, to the wastewater generation in the project area. As shown in **Table IV.L.2-3,** *Estimated Cumulative Wastewater Generation*, the estimated wastewater generation associated with related projects on average is approximately 796,595.6 gpd (0.80 mgd) with a peak flow of 1,354,212.5 gpd (1.35 mgd). The proposed project would contribute an additional 55,352 gpd (0.55 mgd). The peak flow for the proposed project is anticipated to be 94,089 gpd (0.94 mgd). The estimated generation for the proposed project and the related uses would be a combined total of approximately 851947.6 gpd (0.85 mgd). The peak flow for the proposed project and related uses is anticipated to be approximately 1,448,310 gpd (1.45 mgd) as shown in Table IV.L.2-3. The cumulative projects would contribute less than one percent to the HTP flow.

As discussed above, the Hyperion Treatment Conveyance System has a current treatment capacity of 550 mgd and a current average dry water flow of approximately 410 mgd. In 2015, and 2020, the average dry water flow of the Hyperion Treatment Conveyance System is projected to be 492.3 mgd, and 511.5 mgd, respectively. For the years 2015, and 2020, the cumulative wastewater flows would increase the projected average dry water flow to 493.2 mgd, and 512.4 mgd, respectively. This is well below the 550 mgd treatment capacity of the Hyperion Treatment Conveyance System. The average dry water flow projections in conjunction with the cumulative wastewater estimate from related projects represents a conservative analysis as the average dry water flow projections already take into account future population growth, including growth such as that represented by related projects. Furthermore, as with the proposed project, these estimates do not account for reductions in wastewater generation that would occur with implementation of conservation measures.

Implementation of improvements throughout the Hyperion Treatment Conveyance System, as provided for in the IRP, would increase the capacity of the Hyperion Treatment Conveyance System to 570 mgd. The IRP would increase the treatment capacity of TWRP and treatment process at LAGWRP, which would result in less bypass flows to HTP for processing. As such, LADPW anticipates ample wastewater treatment services to the City of Los Angeles and contracting cities through 2020.[13] Therefore cumulative impacts associated with wastewater treatment would be less than significant.

HTP currently meets applicable water quality standards as set forth by the NPDES. As such, the cumulative projects' wastewater effluent discharged to the Santa Monica Bay would have a less than significant impact

Table IV.L.2-3

Estimated Cumulative Wastewater Generation

Land Use	Amount of Development	Wastewater Generation Factor (gpd/unit)[a]	Average Wastewater Generation (gpd)	Peak Wastewater Generation (gpd)[b]
City of Los Angeles				
Dwelling Units[c]	1,470	160	235,200	399,840.0
Commercial/Retail	788,600	0.08	63,088	107,249.6
Office	913,530	0.15	137,030	232,950.2
Hotel	374	130	48,620	82,654.0
High/Trade School[d]	875	12	10,500	17,850.0
Restaurant	15,400	0.30	4,620	7,854.0
Synagogue/Church[e]	100	4	400	680.0
Museum Special Event[f]	100,000	0.80	80,000	136,000.0
Gym	16,800	0.80	13,440	22,848.0
Total – Los Angeles Projects			**592,898**	**1,007,925.8**
City of Beverly Hills				
Dwelling Units	563	160	90,080.0	153,136.0
Commercial/Retail	102,006	0.08	8,160.5	13,872.8
Office	349,812	0.15	52,471.8	89,202.1
Hotel	170	130	22,100.0	37,570.0
Restaurant	34,400	0.30	10,320.0	17,544.0
Medical Office	32,867	0.25	8,216.8	13,968.5
Annenberg Center[g]	650	4	2,600.0	4,420.0
Synagogue/Church	360	4	1,440.0	2,448.0
Car Dealership[h]	103,746	0.08	8,299.7	14,109.5
Parking	470	0.02	9.4	16.0
Total – Beverly Hills Projects			**203,698.1**	**346,286.8**
Related Projects Total			**796,595.6**	**1,354,212.5**
Proposed Project Total			**55,352.0**	**94,098.4**
Grand Total			**851,947.6**	**1,448,310.9**

[a] *Average wastewater generation factor is based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates.*

[b] *Peak wastewater generation factor is based on the wastewater generation factor multiplied by 1.7.*

[c] *Dwelling units were based on the assumption of 2 bedrooms per unit.*

[d] *For the high/trade schools, the rates were the same, which is 12 per student.*

[e] *For synagogue, the rates were the same as for chapels and churches, which is 4 per seat.*

[f] *For the Museum of Tolerance Special Events Pavilion, the rate was based on the assumption that the use would be similar to a banquet hall or ballroom, which is 800 gallons per 1,000 square feet.*

[g] *The Annenberg Center for the Performing Arts will have two theatres, for a total of 650 seats, as well as 470 parking spaces. Assumptions were based on theatres or opera houses.*

[h] *The car dealership will have a new showroom, parking, and additional auto repair bays. The more conservative assumptions were applied to this use, comparing it to a retail use and an auto repair facility. Both use the same factor, which is 80 per 1,000 square feet.*

Source: PCR Services Corporation, 2011.

[13] *City of Los Angeles Department of Public Works Bureau of Sanitation. "City of Los Angeles Integrated Resources Plan - Executive Summary, December 2006". Website: http://www.lacity.org/san/irp/, accessed April 2011.*

on water quality. Implementation of the IRP, upgrades in the advanced treatment processes at HTP, and continual monitoring by the EMD would ensure that effluent discharged into Santa Monica Bay are within applicable limits. Thus, cumulative impacts on Santa Monica Bay water quality would be less than significant and the proposed project's contribution to the impact would not be cumulatively considerable.

As was the case with the proposed project, all related projects in the City of Los Angeles would be subject to LAMC Section 64.15 requiring a determination by LADPW that there is allotted sewer capacity available for each project. Therefore, cumulative impacts on the local sewer infrastructure would be addressed, with required sewer improvements, if needed. The proposed project would not involve the use of Beverly Hills facilities, and therefore the proposed project would not contribute cumulative impacts on such facilities. For these reasons, the cumulative impacts of the project on sewer infrastructure would be less than significant.

5. MITIGATION MEASURES

Mitigation Measure L.2-1: Prior to the issuance of building permits, the Applicant shall provide plans for the proposed project's sewer infrastructure and main-line hook-up to the City of Los Angeles Bureau of Engineering for approval regarding adequacy of capacity and consistency with City sewer regulations and design standards.

6. LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of Mitigation Measure L.2-1 above, the proposed project would result in less than significant impacts with regard to wastewater.

V. ALTERNATIVES

V. ALTERNATIVES

1. SUMMARY OF THE ALTERNATIVES

Under CEQA, the identification and analysis of alternatives to a project is a fundamental aspect of the environmental review process. Public Resources Code Section 21002.1(a) establishes the need to address alternatives in an EIR by stating that in addition to determining a project's significant environmental impacts and indicating potential means of mitigating or avoiding those impacts, the purpose of an environmental impact report is to identify alternatives to the project.

Direction regarding the definition of project alternatives is provided in CEQA Guidelines Section 15126.6(a) as follows:

> *"An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives."*

The CEQA Guidelines emphasize that the selection of project alternatives be based primarily on the ability to reduce significant impacts relative to the proposed project, "even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."[1] The CEQA Guidelines further direct that the range of alternatives be guided by a "rule of reason," such that only those alternatives necessary to permit a reasoned choice are analyzed.[2]

In selecting project alternatives for analysis, potential alternatives should be feasible. CEQA Guidelines Section 15126.6(f)(1) states that:

> *"Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, … and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site."*

The CEQA Guidelines require the analysis of a "no project" alternative and an evaluation of alternative location(s) for the project, if feasible. Based on the alternatives analysis, an environmentally superior alternative is to be designated. If the environmentally superior alternative is the No Project/No Build Alternative, then the EIR shall identify an environmentally superior alternative among the other alternatives.[3]

The first alternative selected for analysis is a No Project/No Build Aalternative, pursuant to Section 15126.6(e) of the CEQA Guidelines. Three additional alternatives were selected to directly address the

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1 *CEQA Guidelines Section 15126.6(b).*

2 *Ibid, Section 15126.6(f).*

3 *Ibid, Section 15126.6(e)(2).*

project's significant and avoidable impacts, which are short-term air quality and noise/vibration impacts that would occur due to project construction, and an exceedence of a two-hour shading standard included in the CCNSP. The three alternatives selected would reduce the extent and duration of construction activity and project shading by developing a project that would be reduced in size, with less building massing. Two of the reduced project alternatives are based on the assumption that the development would exercise the existing site entitlements associated with the 2,143 Replacement Trips available for the project site. These two alternatives with reduced building massing and related construction impacts are an office building with approximately 153,000 sq.ft. of office space; and a residential/hotel project with approximately 289,000 sq.ft. The latter alternative would include 100 residential units, 138 hotel rooms and 10,000 square feet of ancillary hotel uses including a restaurant/bar, banquet facility and sundry sales shop. The third alternative that would reduce building massing to address the project's significant impacts is a reduced density residential project that would reduce the number of residential units on the project site by 25 percent. This alternative would result in a project with 212 residential units and approximately 352,180 square feet. This alternative would utilize only 1,608 of the 2,143 available Replacement Trips.

Based on these potentially significant environmental impacts and the objectives established for the project (refer to Section II, Project Description, in this Draft EIR), as well as consideration of the CCNSP and zoning designations applicable to the project site, the following alternatives to the proposed residential project were evaluated:

1. No Project/No Build Alternative
2. Reduced Project – Residential/Hotel – With Existing Trips
3. Reduced Project – Office – With Existing Trips
4. Reduced Density – Residential – With Reduced Trips

2. ALTERNATIVES CONSIDERED AND REJECTED

In addition, to the guidance cited above regarding purpose and contents of an analysis of alternatives to a proposed project, CEQA Guidelines Section 15126.6(c) states that an EIR identify alternatives that were considered for analysis but rejected as infeasible and briefly explain the reasons for their rejection. According to the CEQA Guidelines, the following factors may be used to eliminate alternatives from detailed consideration: the alternative's failure to meet most of the basic project objectives, the alternative's infeasibility, or the alternative's inability to avoid significant environmental impacts. Alternatives that have been considered and rejected as infeasible include the following.

Alternate Site Location

State CEQA Guidelines Section 15126.6(f)(2) require consideration regarding development at one or more alternative location(s). An alternative site outside of Century City would not meet the project objectives regarding development of higher density housing in Century City allowing convenient access by residents to jobs, retail services, entertainment, public transportation and freeways. Further, the project is proposed to address an appropriate development within Century City, on an undeveloped lot with available Replacement Trips. Development of Century City as a regional center cannot be provided at an alternative location.

Further, it is not apparent that equivalent alternative sites are available, and the project's construction only impacts would likely occur at most locations in the region.

Alternative Site Design

Potential alternative site designs could be developed to alter the project's interface with surrounding neighbors, the massing of buildings or depth of subterranean parking. The project has been designed in a manner that provides building heights that are in keeping with other development in Century City, while providing a substantial amount of site open space. After considering other development plans for the project site, effort was undertaken to locate and mass buildings to reduce impacts on adjacent uses. The project design places this open space at the most advantageous location, providing a large buffer between the project's development and the residential neighborhood and Beverly Hills High School that lie adjacent to the project site to the east and south, respectively. . The following changes to the project design would increase construction impacts related to noise, vibration and air quality impacts, rather than reducing them: construction of more levels of subterranean parking to reduce the above ground mass of building structures, or construction of a building that is lower in height, with a larger building footprint. These changes would require more substantial excavation in proximity to the sensitive high school and residential uses adjacent to the project site, and/or move construction activity closer to those uses. Further, a lower building with a larger footprint would tend to increase shading impacts at the single-family residential unit, where the two-hour CCNSP shading threshold is exceeded.

Other Alternative Site Uses

Alternative site uses including office and hotel space are explored in the alternatives selected for analysis. Other site uses that might be considered for the project site given its location in Century City were also considered. Such uses would include commercial/retail, restaurant/bar, entertainment and/or mixed-use arrangements. All of these uses would involve a greater level of intensity at the project site, and would not be expected reduce impacts, other than those associated with height of the proposed building. Building configurations for such uses would be lower in height, but would not offer the same level of site open space and protection for adjacent surrounding uses. Further, there is no evidence that such uses would be particularly drawn to the project site, give the current land use pattern of Century City, which clusters such uses in the Westfield Shopping Center, with an outlying ring of office and residential buildings.

3. ANALYSIS FORMAT

In accordance with CEQA Guidelines Section 15126.6(d), each alternative is evaluated in sufficient detail to determine whether the overall environmental impacts would be less, similar, or greater than the corresponding impacts of the project. Furthermore, each alternative is evaluated to determine whether the project objectives, identified in Section II., Project Description would be substantially attained by the alternative.[4] The evaluation of each of the alternatives follows the process described below:

a. The net environmental impacts of the alternative after implementation of reasonable mitigation measures are determined for each environmental issue area analyzed in the EIR.

[4] *Ibid, Section 15126.6(c).*

b. Post-mitigation significant and non-significant environmental impacts of the alternative and the project are compared for each environmental issue area. Where the net impact of the alternative would be clearly less adverse than the impact of the project, the comparative impact is said to be "less." Where the alternative's net impact would clearly be more adverse than the project, the comparative impact is said to be "greater." Where the impacts of the alternative and project would be roughly equivalent, the comparative impact is said to be "similar."

c. The comparative analysis of the impacts is followed by a general discussion of whether the underlying purpose and basic project objectives are substantially attained by the alternative.

Table V-10, *Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project,* on page V-47 provides a summary matrix that compares the impacts associated with the project with the impacts of each of the proposed alternatives.

V. ALTERNATIVES
A. ALTERNATIVE 1: NO PROJECT/NO BUILD ALTERNATIVE

1. DESCRIPTION OF THE ALTERNATIVE

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, "in certain instances, the No Project/No Build Alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative 1) assumes that no new development would occur within the project site. Thus, the 283 unit, up to 39 story residential building, with the ancillary building and site open space, would not be developed. The project site would continue to have the existing site entitlements associated with the 2,143 Replacement Trips available for the project site. If residential development were not pursued at the project site it is likely that another project for the project site wishing to avail itself of the Replacement Trips would be proposed.

Under Alternative 1, the project site would remain undeveloped and vacant. Environmental effects under this Alternative would be similar to the negligible effects for most issues associated with existing undeveloped site conditions, as described in the existing setting sections of each analysis in Section IV of this Draft EIR.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics/Visual Resources

(1) Visual Quality/Views

Under the No Project/No Build Alternative, no changes in the visual character of the project site would occur. The site would remain in its degraded condition, with the site appearance defined by the construction fencing surrounding the site. Site improvements including the provision of a landmark development at the gateway to Century City or site landscaping and pedestrian improvements would not be provided. At the same time, without new buildings there would be no alteration to the view setting, or views from public view locations. As such, Alternative 1 would have no impact on the aesthetic quality of the area.

In contrast, the proposed project would alter the project site with development consistent with and blending into the Century City setting, in a manner that is consistent with regulations and policies regarding development at the project site. Impacts of the proposed project regarding visual quality and views are less than significant with mitigation. Under the No Project/No Build Alternative no changes to the environment would occur. Therefore, impacts would be less than those of the proposed project, and would also be less than significant.

(2) Light and Glare

Under the No Project/No Build Alternative, no new lighting would be added to the project site, in contrast to the proposed project which would add night-time lighting to the project site that is similar to lighting and glare conditions currently occurring in the project area. Impacts of the proposed project are less than

significant with mitigation. Since no new light and glare would occur with the No Project/No Build Alternative, the No Project/No Build Alternative would result in less light and glare impact. Impacts of the alternative would be less than significant.

(3) Shading

Under Alternative 1, no development or change in existing conditions would occur. As such, no shading impacts would occur. The proposed project casts shadows on off-site sensitive uses that are generally incidental and less than significant. However, the proposed project would exceed the CCNSP two-hour shading standard at one single family residential unit. Impacts of the No Project/No Build Alternative would be less than those of the proposed project, but unlike those of the proposed project would be less than significant.

b. Air Quality

Construction

The No Project/No Build Alternative would include no new development and, therefore, would not generate additional air pollutant emissions beyond those occurring within the air quality basin. In contrast, the proposed project's construction activity would generate air quality emissions that would result in significant and avoidable impacts in regard to regional NO_x and PM_{10} emissions, as well as localized levels of NO_2 and PM_{10}. While the level of TACs is less than significant with the proposed project construction, the projects contributions to pollutant levels would be reduced under the No Project/No Build alternative. The alternative would avoid the significant unavoidable regional and localized impacts to air quality that would be caused by the proposed project.

Operations

As no development would occur under Alternative 1, operational emissions would remain at existing conditions. In contrast, the proposed project would contribute air quality emissions into the environment at levels that are less than significant. As no operational air quality impacts would occur under Alternative 1, impacts would be less than those of the proposed project, and would also be less than significant.

c. Cultural Resources

The No Project/No Build Alternative would not result in the modification of the existing subsurface to accommodate the proposed project. No soils would be excavated and exported off-site. Under the proposed project, excavation would occur mostly in previously disturbed top soil and cultural resources are not expected to be encountered. Notwithstanding, mitigation measures to provide for collection and treatment of resources have been proposed in the unlikely-event such resources should be recovered. As impacts to cultural resources would definitely be avoided under Alternative 1, potential impacts are considered to be less than those of the project and impacts of the alternative would be less than significant.

d. Geology/Soils

The No Project/No Build Alternative would not involve the development of new buildings and would not have impacts regarding public safety assurances that would be required for project development. The

proposed project's implementation would be designed to meet building safety requirements pursuant to proper engineering studies as required in a project mitigation measure. As the No Project/No Build Alternative would have no impacts, its impacts would be less than those of the proposed project and would be less than significant.

e. Greenhouse Gas Emissions

The No Project/No Build Alternative would not contribute new uses to the project site and therefore would not result in the direct generation of greenhouse gas emissions. At the same time, this alternative would not support establishment of land use patterns that are encouraged to reduce the level of greenhouse gas emissions. The proposed project's construction and residential activity would generate greenhouse gases and at the same time would contribute to meeting the AB32 policies regarding reductions in greenhouse gas emissions. Impacts of the No Project/No Build Alternative would be less than those of the proposed project, and like the proposed project would be less than significant.

f. Hazards and Hazardous Materials

The No Project/No Build Alternative would not alter the existing project site, nor would it introduce new uses or activities. Under this Alternative, the existing conditions of the project site, which is currently vacant, graded, and enclosed with construction fencing would remain. No hazardous materials currently exist on site and under Alternative 1 no new hazardous substances would be introduced to the project site. As such this alternative would have no impacts with regard to hazards and hazardous materials. The proposed project's impacts would be negligible, and less than significant with mitigationImpacts related to hazardous substances would be less than significant and would be less than the project's impacts.

g. Hydrology and Surface Water Quality

Under this Alternative, existing uses would remain and no new construction would occur. Therefore, no modifications to the existing drainage patterns or type of runoff generated from the project-site would occur. Thus, impacts would be reduced when compared with the project and the less than significant impact hydrology and surface water quality impacts of the project would not occur.

h. Land Use

Under the No Project/No Build Alternative, there would be no changes to the land uses on-site. As such, there would be no changes in land use patterns and/or the arrangement of development in the surrounding community. At the same time, the No Project/No Build alternative would not support numerous policies that support Century City's development as a regional center with higher density uses. Numerous City policies, as well as well as SCAQMD and SCAG policies encourage the development of high density uses at the project site to reduce vehicle miles traveled and associated air quality emissions. In contrast, the proposed project would support the desired policy driven land use patterns. Further, it would be consistent with other applicable City and regional policies and regulations. It would also not change land use relationships in the project area or alter existing patterns.

Since this alternative would not change the use of the project site, nor land use relationships in the project areas, its impacts would be considered less than those of the proposed project; and like those of the proposed project would be less than significant.

i. Noise

No development would occur within the project site under this alternative. Consequently, it would not generate any new or increased sources of noise or vibration on the project site or within the surrounding vicinity due to project construction or project operations. The No Project/No Build Alternative would not result in an increase in traffic to the project vicinity and would not introduce new noise sources and current noise levels on the vacant property would remain the same. As such, the significant and unavoidable construction noise and vibration impacts that would occur under the proposed project would be avoided under this alternative. Further, the non-significant level of noise associated with the proposed project during operations would not occur. Impacts due to project noise of the No Project/No Build Alternative would be less than those of the proposed project, and less than significant for both construction and operations.

l. Public Services

(1) Fire Protection

Under the No Project/No Build Alternative, no increased demand for fire protection services or fire flow facilities (i.e., upgrades to existing lines and/or additional fire hydrants) would occur. The No Project/No Build Alternative also would not impact the delivery of fire protection services that might otherwise occur from impacts on area traffic flow from construction activities or development-related traffic. While the proposed project would add new population at the project site with potential need for fire and/or emergency services, the impacts on the delivery of fire protection services would be reduced to less than significant levels through code compliance and the implementation of design features and mitigation measures, including fire alarm systems, fire suppression systems, and sufficient fire flow capabilities. The No Project/No Build Alternative would not result in any increased impact on fire services. Therefore, the impact of the No Project/No Build Alternative relative to fire services would be less than under the proposed project.

(2) Police Protection

The No Project/No Build Alternative would not change the existing conditions or increase the residential or daytime population currently on-site. As the project site is currently vacant and fenced off with construction fencing, the current demand for police services is low. This alternative would not alter the demand for police protection services. No construction or operational activities would occur that would impact emergency vehicle response times to the project site or surrounding area. Implementation of the proposed project would introduce new population at the project site with a potential need for police services. However, it would reduce the need for police services through project design and numerous site safety features including 24-hour/7-day security service, resulting in a less than significant level. Impacts of the No Project/No Build alternative on police services would be less than those of the proposed project, and like the proposed project would be less than significant.

(3) Schools

As the No Project/No Build Alternative would not generate any school-age children, there would be no change in the demand for schools relative to existing conditions. Impacts associated with the proposed project would be mitigated to less than significant levels via the payment of school fees at the time of building permit issuance. Since the No Project/No Build Alternative would not generate any school-age children or cause an increase in demand for schools compared to existing conditions, impacts relative to schools would be less under the No Project/No Build Alternative compared to the proposed project and would be less than significant.

(4) Libraries

The No Project/No Build Alternative would not result in new site population that would increase the demand for library services. Impacts to library facilities associated with the proposed project would be less than significant. However, since the No Project/No Build Alternative would not generate an increase in demand for library services as compared to existing conditions, impacts relative to libraries would be less under the No Project/No Build Alternative than under the proposed project.

(5) Parks and Recreation

The No Project/No Build Alternative would not result in new site population that would increase the demand for parks and recreation services. In contrast, the proposed project would generate approximately 379 new residents, which would generate a demand for parks and recreational facilities. Project impacts on park and recreational facilities would be reduced to a level that is less than significant through provision of extensive on-site recreation facilities, and if needed to meet City requirements, a mitigation measure that provides for dedicated park space, payment of in-lieu fees, or on-sites improvements equivalent to the fees. However, since the No Project/No Build Alternative would have not directly or indirectly generate new residents, no impacts to park facilities would occur and impacts would be less than those under the proposed project.

k. Traffic and Circulation

The No Project/No Build Alternative would not generate new population activity and would cause no impact to the transportation system due to construction or operation activities. In contrast, the proposed project would add trips to regional and local roadways for construction activities and the project operations, i.e. accommodation of the site's residential population. The proposed project would generate 1,189 daily trips, with 96 occurring in the A.M. Peak Hour and 108 in the P.M. Peak Hour. The proposed project includes several mitigation measures to ensure that construction activities accommodate smooth and efficient transportation flow during construction, thus avoiding significant impacts due to construction activities. The project's 1,189 daily trips would add trips to the roadway network and public transportation system. However, the increase in trips would have less than significant impacts on roadway and public transit conditions. The proposed project's access and parking facilities have been designed to meet project needs and would have less than significant impacts. Impacts of the No Project/No Build Alternative would be less than those of the proposed project and would be less than significant.

I. Utilities and Service Systems

(1) Water Supply

The No Project/No Build Alternative would not add facilities or population at the project site; therefore, water demand for this Alternative would be consistent with the existing vacant conditions at the project site. In contrast, the proposed project would have a demand for approximately 58,139 gallons of water per day, or approximately 65 acre feet per year. Water infrastructure and water supply is sufficient to meet these proposed project demands without project mitigation; and the project impact on the provision of water services would be less than significant. Impacts of the No Project/No Build Alternative would be less than under the proposed project and would likewise be less than significant.

(2) Wastewater

The No Project/No Build Alternative would not add facilities or population at the project site; therefore, wastewater generation for this Alternative would be consistent with the existing vacant conditions at the project site. This alternative would not increase wastewater generation from existing conditions and no additional wastewater would be added to the Hyperion Treatment Conveyance System or Hyperion Treatment Plant. In contrast the proposed project would generate approximately 55,352 gallons of wastewater per day that would need conveyance and treatment. However, the project's additional wastewater would be within the capacity limits of the sewerage and treatment facilities serving the project site, and with implementation of a mitigation measure ensuring an adequate hook-up to local main-lines would be less than significant. Impacts of the alternative would be less than those of the proposed project and like those of the proposed project would be less than significant

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The No Project/No Build Alternative would not meet any of the project objectives. It would not contribute high density housing to Century City and therefore would not meet the key development objective's that support local and regional plans. It would not maximize housing within an existing activity center with existing infrastructure to reduce vehicle trips and infrastructure costs (Objective 1); or provide residential development to support the housing needs of the City (Objective 2). Further, it would not contribute to the development of Century City vision as a well-balanced, urban community in which people can "live, work, and play" (Objective 3). The alternative would also not maximize residential activity along public transit facilities (Objective 4), nor maximize the residential support base for the Century City retail and entertainment activities (Objective 5).

By leaving the project site in its current underutilized disturbed condition, the No Project -- /No Build Alternative would not provide a distinctive structure at a key gateway to Century City (Objective 7); would not provide street-level pedestrian activity and connectivity as called for in the 2007 Greening of Century City Pedestrian Connectivity Plan (Objective 6); and would not contribute to sustainable development within the region (Objective 11). Further it would not provide a secure, convenient urban development with state of the art recreation facilities and gardens to serve project residents (Objective 8), or enhanced buffering with neighboring uses (Objective 9). Lastly, the alternative would not contribute to the project's economic objectives, as it includes no development and provides no economic benefit. It would not strengthen the regional economy through the provision of work for the construction industry (Objective 12), maximize the site's in-fill development potential given the number of Replacement Trips available at the project site (Objective 11), or maximize economic expansion through the provision of high density housing (Objective 13).

V. ALTERNATIVES
B. ALTERNATIVE 2: REDUCED PROJECT – RESIDENTIAL/HOTEL (EXISTING TRIPS)

1. DESCRIPTION OF THE ALTERNATIVE

The Residential/Hotel Alternative would reduce the size of the project by replacing a large number of the residential units with hotel rooms. The alternative would have 100 residential units and 138 hotel rooms, the maximum unit count per the Replacement Trips available at the project site. The hotel component would also include 10,000 sq.ft. of hotel related/support uses, the maximum allowed under a hotel/non-retail classification in the CCNSP. Support uses would include a restaurant/bar, a small banquet facility and provision for sundry sales. This alternative would reduce building area (and related construction impacts) from 469,575 sq.ft. to 289,500, a reduction of approximately 38 percent. It is assumed that this alternative would use a site design similar to that of the proposed project, would reduce the amount of construction, and thus construction related impacts through a reduction in building heights. Accordingly, the residential and hotel uses would be provided in a roughly estimated 23 story tower, up to approximately 375 feet in height. Parking would be provided in a 4-story ancillary parking structure to provide the 319 parking spaces that would be required for such a project. The two buildings would have floor-plate areas and site locations similar to those of the proposed project.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics/Visual Resources

(1) Visual Quality/Views

Under the Reduced Project -- Residential/Hotel Alternative the visual character of the project site would be altered from its current vacant character to that of a developed appearance consistent with the character of the existing Century City surroundings. Like the proposed project, it would add a new tower and ancillary parking facility and include a large landscaped area to buffer the project site from surrounding uses with enhanced landscaping along the street frontages. As such, the alternative would provide a gateway structure to Century City and enhance the pedestrian milieu adjacent to the project site. In large part the alternative's aesthetic impacts would be similar to those of the proposed project. Views of the project site at ground level and in the project's near vicinity would be similar to those of the proposed project with similar placement of landscaping and building locations. It can be assumed that the landscaping program and architectural style of the alternative would be varied to the tastes of the alternative project but would not necessarily be less preferable or more preferable than that of the proposed project.

The differences in appearance between the Reduced Project -- Residential/Hotel Alternative and the proposed project would be due to the lower building heights of the alternative. The reduced building heights would be apparent as view locations become more distant from the project site. The reduced height of ancillary/parking building would be most noted from locations on Durant Drive in the residential area east of the project site. As viewed from this location, the reduced height of the ancillary parking structure would provide a little less massing on the project site, but would blend into the taller surrounding buildings currently surrounding the project site in a manner similar to that of the proposed project. This alternative would reduce the height of the tower building from up to 460 feet to up to 375 feet. The lower height would

be visually similar to that of the proposed project as it would be sufficiently tall to read as a high-rise element within the landscape, consistent with other high-rise buildings. The reduction in building height would result in a lesser change to the existing conditions than the proposed project, however, the effects of building massing on aesthetic character and views would be similar under the alternative and the proposed project.

The proposed project includes mitigation measures to reduce aesthetic impacts during construction and to assure that landscaping and trees are provided consistent with City requirements to reflect an attractive project character. Similar mitigation would be required for the alternative. Impacts of the proposed project regarding visual quality and views are less than significant with mitigation. Implementation of the Reduced Project -- Residential/Hotel Alternative would result in impacts that would be slightly reduced from those of the proposed project and would also be less than significant with mitigation.

(2) Light and Glare

Under the Reduced Project -- Residential/Hotel Alternative the project site would be developed in a manner that is consistent with typical Century City development providing night-time lighting for site security, support of night-time uses and building highlighting. It is assumed that such a project would not require the use of highly reflective materials and would not have glare effects different those already occurring in the project vicinity. Thus, light and glare effects of this alternative would be similar to those of the proposed project. While the alternative would generate slightly less light without the proposed project's upper story contribution from higher level residential units, the variation in lighting would be negligible. Lighting at ground level for the alternative and the proposed project would be similar. It is assumed that the alternative would require mitigation similar to that of the proposed project to assure that site lighting and glare characteristics are consistent with City guidelines/regulations. Impacts of the Reduced Project -- Residential/Hotel Alternative would be similar to those of the proposed project and less than significant with mitigation.

(3) Shading

Under the Reduced Project -- Residential/Hotel Alternative new buildings would be located in the same locations as would the proposed project but would be lower in height. This would result in shading patterns that are similar to those of the proposed project, but with slightly shorter extents. The shading from the ancillary/parking structure of the alternative would be less than that of the proposed project however the change is not notable as the ancillary/parking building is nestled within the south-east corner of the project site, away from sensitive uses and would have negligible impacts with either project. The reduction in the height of tower building would slightly reduce shading impacts, particularly on the golf course north of the project site. However, the shading impacts of the proposed project on the golf course would be less than significant, and the reductions in shading would be minor. The reductions in shading impacts on the residential neighborhood to the east of the project site would not reduce the already less than significant L.A. CEQA significance threshold impacts at the residential units nearest to the proposed project. Rather, the reduced shading would result in a reduction in the number of residential units so affected. The amount of shading that would occur at the single-family family residential unit that receives more than the CCNSP two hour standard of shading from the proposed project would continue to receive substantially the same amount of shading as the proposed project. This result occurs due to the fact that the shading effects at that particular location are controlled more by building shape than building height. Shading impacts of the Reduced Project -- Residential/Hotel Alternative would be less than those of the proposed project, and like

those of the proposed project would be less than significant per the L.A. CEQA Thresholds significance thresholds; but significant pursuant to the CCNSP standard.

b. Air Quality

Construction

The Reduced Project -- Residential/Hotel Alternative would require a construction program inclusive of excavation, foundation preparation and building erection. The excavation program would likely be similar to that of the proposed project given the site conditions and the minimum excavation program of the proposed project. The proposed project is in large part setting its building structures onto an elevation near the existing site ground level without notable excavation for deep subterranean structures. Given the nature of the Reduced Project -- Residential/Hotel Alternative with mid-rise and tower buildings, the foundation work of the alternative would be similar to that of the proposed project. The reduced height of the alternative's buildings would reduce the amount of construction needed; however the overall construction program for the buildings would be somewhat similar, with more effort being required for hotel facilities than residential development. As the greatest effects occur during excavation, and the reduced building heights only lessen the construction effort a small amount the net impacts of construction on air quality emissions would be slightly reduced.

The proposed project includes mitigation measures to reduce air quality emissions from construction activity. Notwithstanding, the proposed project's construction activity would generate air quality emissions that would result in significant and unavoidable impacts in regard to regional NO_x and PM_{10} emissions, as well as localized levels of NO_2 and PM_{10}. Its impacts regarding the level of TACs emitted are less than significant. As the analysis of impacts on air quality addresses maximum air emissions that can occur on a day of maximum construction activity, the Reduced Project -- Residential/Hotel Alternative would likely result in significant impacts on regional and localized emissions that are similar to those of the proposed project. This is particularly true during the excavation phase, which is the phase of development that generates the greatest level of air emissions. The site preparation for any type of development with the project's soil characteristics would be similar to that of the proposed project. Therefore, air quality impacts of the Reduced Project -- Residential/Hotel Alternative would be slightly less than those of the proposed project, and would still be considered to generate significant and unavoidable regional and localized impacts; and less than significant toxic air contaminant impacts.

Operations

The Reduced Project -- Residential/Hotel Alternative would create a new development with residential and hotel activities. The new site uses would cause an increase in air quality emissions associated with consumption of energy for site activities and transportation to and from the project site, as well as the use of consumer products, etc. Likewise, the proposed project would generate air quality emissions due to similar types of site activity. The impacts of the proposed project due to project operations are less than significant for regional emissions, localized emissions and toxic air contaminants. In comparison, the Reduced Project -- Residential/Hotel Alternative would generate similar emissions for on-site activity, and, would generate more air emissions from the burning of fossil fuels associated with transportation. (As described further below, this alternative would generate more traffic than the proposed project.) As the air emissions from traffic are a much larger component of the overall regional emissions generated, the air quality impacts

associated with this alternative would be greater than those of the proposed project. Further, this alternative's lower amount of residential development would not support the establishment of regional development patterns that contribute to reductions in air emissions, particularly greenhouse gases, in the way the proposed project would. Therefore, impacts of the Reduced Project -- Residential/Hotel Alternative on air quality would be greater than those of the proposed project, but like the proposed project, less than significant.

c. Cultural Resources

The Reduced Project -- Residential/Hotel Alternative would require the implementation of a construction program similar to that of the proposed project, with excavation into native soils. Therefore, the potential to encounter cultural resources would be similar to the proposed project. Under the proposed project, excavation would occur mostly in previously disturbed top soil and cultural resources are not expected to be encountered. Notwithstanding, mitigation measures to provide for collection and treatment of resources have been proposed in the off-event such resources should be recovered. Therefore, impacts of the Reduced Project -- Residential/Hotel Alternative would be similar to those of the proposed project, and like the proposed project would be less than significant with mitigation.

d. Geology/Soils

The Reduced Project -- Residential/Hotel Alternative would be built on the same geology and soils as the proposed project, and like the proposed project would be designed to meet building safety requirements pursuant to proper engineering studies as required in a project mitigation measure. Therefore, impacts of the Reduced Project -- Residential/Hotel Alternative would be similar to the proposed project, and like those of the proposed project, would be less than significant with mitigation.

e. Greenhouse Gas Emissions

The Reduced Project -- Residential/Hotel Alternative would generate greenhouse gases due to its construction and operations. In comparison, to the proposed project, this alternative would generate fewer emissions for on-site activity, however, would generate more air emissions from the burning of fossil fuels associated with transportation. (As described further below, this alternative would generate more traffic than the proposed project.) As the air emissions from traffic are a much larger component of the overall regional emissions generated, the greenhouse gas emissions associated with this alternative would on net be greater than those of the proposed project. Further, this alternative's lower amount of residential development would not support the establishment of regional development patterns that contribute to reductions in air emissions, particularly greenhouse gases, in the way the proposed project would. Therefore, impacts of the Reduced Project -- Residential/Hotel Alternative would be greater than those of the proposed project, but like the impacts of the proposed project, would be less than significant

f. Hazards and Hazardous Materials

The Reduced Project -- Residential/Hotel Alternative would provide common urban uses on a site with no known contaminants, and underlying methane at a level that is common throughout the project vicinity. As such, these uses would be carried out under regulations that protect the environment from hazardous conditions. In this regard, potential impacts of the Reduced Project -- Residential/Hotel Alternative are similar to those of the proposed project. The proposed project includes mitigation measures to ensure that

project development proceeds in a manner that is consistent with the required regulations. Therefore, impacts of the Reduced Project -- Residential/Hotel Alternative would be similar to those of the proposed project, and like those of the proposed project would be less than significant with mitigation.

g. Hydrology and Surface Water Quality

The Reduced Project -- Residential/Hotel Alternative would be a typical in-fill urban project with a potential to alter drainage patterns and/or add urban surface pollutants to the water flow passing over and through the project site. Such development would be implemented pursuant to regulations for the protection of public and environmental safety and the use of Best Management Practices (BMPs) for construction and operations. In this regard, the potential impacts of this alternative are similar to those of the proposed project. The proposed project includes several mitigation measures to ensure appropriate implementation of the regulations and BMPs. In particular, the proposed project includes a biofiltration system to control water flow and provide water quality treatment. It is assumed that an alternative project at the project site would be required to include regulatory BMPs to control run-off and water quality of some type to meet regulatory requirements. Therefore, impacts of the Reduced Project -- Residential/Hotel Alternative would be similar to those of the proposed project, and like the proposed project would be less than significant.

h. Land Use

The Reduced Project -- Residential/Hotel Alternative would develop the project site with residential units and hotel rooms. Both of these uses are typical of uses occurring within Century City and supportive of the vision for Century City. The alternative development would be provided within the project site, without off-site impacts. As such, there would be no changes in land use patterns and/or the arrangement of development in the surrounding community. Further, the development of such uses, with an FAR of approximately 2.8:1, could be provided in a manner that is consistent with City regulations and policies. It is assumed that such a project would be designed in a manner that blends with surrounding uses and would enhance the pedestrian ways adjacent to the project site, as would the proposed project. The hotel uses would be a more intensive site use, with the coming and going of visitors, and use of supporting restaurants/bars with night-time activity. As indicated in the comparative impacts on traffic below, the alternative would generate approximately 30 percent more daily trips than the proposed project. Such a site use would likely include a Conditional Use Permit for the sale of alcoholic beverages. These characteristics of the alternative make it less compatible with adjacent school and residential uses than the characteristics of the proposed project's residential development. Also, the Reduced Project -- Residential/Hotel Alternative would not provide the same contribution as the proposed project to SCAQMD, SCAG and state (AB-32) policies/goals to reduce vehicle miles traveled and associated air quality emissions. It would also produce fewer residential units to support City policies for meeting housing needs within the City.

In contrast, the proposed project would provide greater support for the desired policy driven land use patterns, by locating a larger permanent population in proximity to the Century City commercial and entertainment services, and public transit services. Further, the proposed project would generate fewer traffic trips than the alternative.

The land use impacts of the Reduced Project -- Residential/Hotel Alternative would be mostly similar to those of the proposed project. However, as the hotel uses would generate an increased level of site activity, and the reduced level of residential development would provide less support for regional policies intended

to reduce vehicle miles traveled, impacts of Reduced Project -- Residential/Hotel Alternative would be considered greater than those of the proposed project. As was the case with the proposed project, impacts of the alternative would be less than significant.

i. Noise

Construction

The Reduced Project -- Residential/Hotel Alternative would require a construction program inclusive of excavation, foundation preparation and building erection. The excavation program would likely be similar to that of the proposed project given the site conditions and the minimum excavation program of the proposed project. The proposed project is in large part setting its building structures onto an elevation near the existing site ground level without excavation for deep subterranean structures. Given the nature of the Reduced Project -- Residential/Hotel Alternative with mid-rise and tower buildings, the foundation work of the alternative would be similar to that of the proposed project. The reduced height of the alternative's buildings would reduce the amount of construction needed; however the overall construction program for the buildings would be somewhat similar, with more effort being required for hotel facilities than residential development.

The proposed project includes mitigation measures to reduce noise and vibration impacts from construction activity. Notwithstanding, the proposed project's construction activity would generate noise and vibration levels that would be significant and unavoidable. As the analysis of noise impacts addresses the maximum noise levels that can occur during maximum construction conditions (heaviest equipment nearest to sensitive uses) the Reduced Project -- Residential/Hotel Alternative would likely result in significant impacts similar to those of the proposed project. This is particularly true during the excavation phase, which is the phase of development that generates the greatest level of noise. The site preparation for any type of development with the project's soil characteristics would be similar to that of the proposed project. Therefore, noise and vibration impacts of the Reduced Project -- Residential/Hotel Alternative would be slightly less than those of the proposed project, and would still be significant and unavoidable.

Operations

The Reduced Project -- Residential/Hotel Alternative would create a new development with residential and hotel activities. The new site uses would cause an increase in noise associated with stationary and mobile (i.e. automobile trip) sources. Likewise, the proposed project would generate noise impacts due to similar types of site activity. The variations in the sound levels from stationary sound sources would be negligible, and less than discernable. The greater number of trips associated with this alternative (as discussed below) would provide a greater contribution to the cumulative noise environment than would the proposed project. Therefore, operations noise impacts of the Reduced Project -- Residential/Hotel Alternative would be greater than those of the proposed project, and like the proposed project would be less than significant.

l. Public Services

(1) Fire Protection

The Reduced Project -- Residential/Hotel Alternative would add new population at the project site with potential need for fire and/or emergency services. The estimated site population for evaluating this

alternative's impacts on fire services is 341 people.[5] Based on the existing incident factor of 0.19 response incidents per capita, the alternative would generate 64 annual incident responses. The actual number of emergency calls could be higher than indicated by the incident response estimate due to an increased demand for services associated with the alternative's bar/restaurant uses. The Reduced Project -- Residential/Hotel Alternative would also include construction activities that would add traffic to the local road network, potentially affecting emergency response times. In contrast, the proposed project would have a site population of 379 people, potential generating 72 incidents per year; and construction trips that would be similar to those of the alternative on a worst-day basis, but occurring over a greater number of days. While the proposed project would add new population at the project site with potential need for fire and/or emergency services, the impacts on the delivery of fire protection services would be reduced to less than significant levels through code compliance and the implementation of design features and mitigation measures, including fire alarm systems, fire suppression systems, and sufficient fire flow capabilities. Similar measures would be applied to the alternative. Therefore, impacts on fire services would be similar for the Reduced Project -- Residential/Hotel Alternative, and like the impacts of the proposed project would be less than significant after mitigation.

(2) Police Protection

The Reduced Project -- Residential/Hotel Alternative would add new population at the project site with potential need for police and emergency services. The estimated site population for evaluating this alternative's impacts on police services is 341 people.[6] Based on the existing incident factor of 0.025 incidents per capita, the alternative would generate eight annual incidents requiring police responses. The actual number of emergency calls could be higher than indicated by the incident response estimate due to an increased demand for services associated with the alternative's bar/restaurant uses. The Reduced Project -- Residential/Hotel Alternative would also include construction activities that would add traffic to the local road network, potentially affecting emergency response times. In contrast, the proposed project would have a site population of 379 people, potentially generating nine incidents per year, an increase of one incident per year. The proposed project would generate construction trips that would be similar to those of the alternative on a worst-day basis, but occurring over a greater number of days. The proposed project would reduce the need for police services through project design and numerous site safety features including 24-hour security service to reduce potential impacts on police services to a less than significant level. The variation in impacts between the alternative and the proposed project is small; however, the hotel/bar component of the alternative could result in greater impacts than those of the proposed project's limited residential uses. Impacts of the Reduced Project -- Residential/Hotel Alternative would like those of the proposed project be less than significant.

(3) Schools

The Reduced Project -- Residential/Hotel Alternative would add new residential units at the project site and hotel uses which would generate students attending public schools. While hotel visitors would not attend

[5] *The 100 residential units would generate a population, base on the average household size of 1.34 residing in Century City tract 2679.01 per the 2010 U.S. Census. The Los Angeles CEQA thresholds guide recommends that non-residential population be considered when evaluating impacts on police and fire services. The recommended population generation factor is 1.5 persons per room. Thus, the equivalent population for 238 hotel rooms is 207 people.*

[6] *The 100 residential units would generate a population, base on the average household size of 1.34 residing in Century City tract 2679.01 per the 2010 U.S. Census. The Los Angeles CEQA thresholds guide recommends that non-residential population be considered when evaluating impacts on police and fire services. The recommended population generation factor is 1.5 persons per room. Thus, the equivalent population for 238 hotel rooms is 207 people.*

the local schools, LAUSD considers hotel uses to generate students as a secondary effect although at lower levels than for residential development. Based on the LAUSD student generation factors, the alternative would be expected to generate 12 elementary school students, 7 middle school students and 8 high school students.[7] This student generation is less than that associated with the proposed project: 32 elementary students (20 more than the alternative), 16 middle school students (9 more than the alternative) and 20 high school students (12 more than the alternative. Impacts associated with both the alternative and the proposed project would be mitigated to less than significant levels via the payment of school fees at the time of building permit issuance. Therefore, impacts of the Reduced Project -- Residential/Hotel Alternative on schools would be less than those of the proposed project, and like the proposed project would be less than significant.

(4) Libraries

The Reduced Project -- Residential/Hotel Alternative would generate a population of 134 new residents that might use local libraries. Visitors to the alternative's hotel rooms would likely not contribute to the demand for library services, or perhaps very negligible demand. In contrast, the proposed project would include 379 residents, 245 more residents than the alternative that might use local libraries. The level of service demand associated with the proposed project is nominal and would not require new facilities to meet its demand, and would be less than significant. Impacts of the Reduced Project -- Residential/Hotel Alternative would be less than those of the proposed project and like those of the proposed project would be less than significant.

(5) Parks and Recreation

The Reduced Project -- Residential/Hotel Alternative would generate a site population of 134 people and 138 hotel room visitors that would generate a need for park and recreation facilities. This contrasts with the 379 site residents associated with the proposed project. The proposed project impacts on parks and recreation would be met through provision of extensive on-site recreation facilities (11,332 square feet of recreation space and 70,720 sq.ft. of common open space), and if needed to meet City requirements, a mitigation measure that provides for dedicated park space, payment of in-lieu fees, or on-site improvements equivalent to the fees. The alternative would likely include similar recreation facilities and open space areas to be shared by site residents and hotel visitors. The public open space obligation of the Reduced Project -- Residential/Hotel Alternative would be less than that of the proposed project: 0.46 acres in contrast to the proposed project's 0.77 acres, or the in-lieu contributions. Therefore, the contributions for public parks could be less under the alternative than that of the proposed project. However, it is assumed that impacts of the Reduced Project -- Residential/Hotel Alternative on park and recreation services would be similar to those of the proposed project after mitigation, and like the proposed project would be less than significant after mitigation.

[7] *Student generation rates are based on the LAUSD School Fee Justification Study, September, 2010. The generation rates for the alternative's 100 residential units for elementary, middle and school and high school students respectively are 0.1141, 0.0571 and 0.0694. The generation rates for the alternative's 138 hotel rooms for elementary, middle and school and high school students respectively are 0.009, 0.0046, and 0.0193, respectively.*

k. Traffic and Circulation

Construction

The Reduced Project -- Residential/Hotel Alternative would also add automobile and truck traffic to the local road system during construction. The maximum amount of traffic on any one day would be similar to that of the proposed project. The proposed project includes several mitigation measures to ensure that construction activities accommodate smooth and efficient transportation flow during construction, thus avoiding significant impacts due to construction activities. The alternative would be expected to include similar mitigation measures. Therefore, impacts of the Reduced Project -- Residential/Hotel Alternative due to construction traffic would be similar to those of the proposed project, and like those of the proposed project would be less than significant.

Operations

The trip generation for the Reduced Project -- Residential/Hotel Alternative is shown in **Table V-1**, *Project Trip Generation – Alternative 2*. As indicated the alternative would add 1,547 daily trips with 111 trips occurring during the A.M. Peak hour and 143 trips occurring in the P.M. peak hour. The proposed project would generate 1,189 daily trips, with 96 occurring in the A.M. Peak Hour and 108 in the P.M. Peak Hour. The amount of traffic generated by the alternative would be greater than that of the proposed project by 358 daily trips, 15 A.M. peak hour trips and 35 P.M. peak hour trips. While the additional trips would increase the V/C ratios at the analyzed intersections over those of the proposed project, the increase is not expected to result in a significant impact at any of the study intersections. It is expected that the alternative would provide access and parking appropriate to the site use as would the proposed project, and would have similar impacts on public transportation. Impacts of the Reduced Project -- Residential/Hotel Alternative would be greater than those of the proposed project, but like those of the proposed project would be less than significant.

Table V-1

Project Trip Generation – Alternative 2

				Trip Generation Rates [a]						Estimated Trip Generation						
				A.M. Peak Hour			P.M. Peak Hour				A.M. Peak Hour Trips			P.M. Peak Hour Trips		
Land Use	Size	ITE Code	Daily Rate	Rate	In	Out	Rate	In	Out	Daily Trips	In	Out	Total	In	Out	Total
Condominium																
Condominium	100 du	222/232	4.20 [b]	0.34 [b]	19%	81%	0.38 [b]	62%	38%	420	6	28	34	24	14	38
Hotel																
Hotel	138 rooms	310	8.17	0.56	61%	39%	0.76	53%	47%	1,127	47	30	77	56	19	105
Total Trips, Alternative 2										**1,547**	**53**	**58**	**111**	**80**	**33**	**143**
Proposed Project Trips										**1,189**	**18**	**78**	**96**	**67**	**41**	**108**
Comparison (Alternative – Proposed Project)										**358**	**35**	**(20)**	**15**	**13**	**22**	**35**

[a] *Source for trip generation rates: Trip Generation, 8th Edition, Institute of Transportation Engineers (ITE), 2008, unless otherwise noted.*

[b] *For flexibility, the trip generation analysis uses the most conservative (highest) rates for high-rise apartments versus high-rise condominiums: ITE code 222 (high-rise apartment) for daily trips and ITE code 232 (high-rise condominium) for peak hour trips.*

Source: Fehr & Peers, June 2011

I. Utilities and Service Systems

(1) Water Supply

The Reduced Project -- Residential/Hotel Alternative would include residential and hotel uses that would generate demand for the consumption of water resources. The water demand is shown in **Table V-2**, *Estimated Water Demand - Alternative 2,* along with the water demand for the proposed project. As indicated this alternative would require the consumption of 11,2241 fewer gallons per day or 13 acre feet per year. The proposed project includes numerous project design features to reduce the demand for water consumption. It is assumed that the alternative project would include similar features consistent with the nature of its proposed uses. Water infrastructure and water supply is sufficient to meet the demands of the proposed project without project mitigation; and the project impact on the provision of water services would be less than significant. Impacts of the Reduced Project -- Residential/Hotel Alternative would be less than those of the proposed project and would also be less than significant.

Table V-2

Estimated Water Demand - Alternative 2

Land Use	Amount of Development	Water Use Factor (gpd/unit)[a]	Water Use (gpd)	Water Use (AF per year)
Condominiums [b]	100	160	16,000	18
Hotel (Rooms)	138	130	17,940	20
Hotel (Rest/Bar etc.) [c]	10,000	0.578	5,780	6
Recreational Facilities	11,332	0.25	2,833	3
Landscaping	34,246	0.071	2,431	3
Parking	95,700	0.02	1,914	2
Total – Alternative 2			**46,898**	**52**
Proposed Project			**58,139**	**65**
Comparison (Alternative - Proposed Project)			**-11,241**	**-13**

[a] *Water use factors as described in the Water Supply analysis for the proposed project above.*
[b] *Dwelling units were based on the assumption of 2 bedrooms per unit.*
[c] *Water use factor is a weighted average assuming 500 gpd for 5,000 sq.ft. of bar/restaurant use; 800 gpd for 4,000 sq.ft. of banquet space; and 80 gpd for 1,000 sq.ft. of sundry sales = 678 gpd/1000 sq.ft.*

Source: PCR Services Corporation, 2011.

(2) Wastewater

The Reduced Project -- Residential/Hotel Alternative would include residential and hotel uses that would generate wastewater that would need to be conveyed and treated. The estimated wastewater generation for this alternative is shown in **Table V-3**, *Estimated Wastewater Generation - Alternative 2,* along with the wastewater generation for the proposed project. As indicated this alternative would generate 10,885 gallons per day less than the proposed project or 18,505 gallons per day less during peak episodes of waste water generation. However, the project's additional wastewater generation would be within the capacity limits of the sewerage and treatment facilities serving the project site, and with implementation of a mitigation measure ensuring an adequate hook-up to local main-lines would be less than significant. The alternative project, as would any development located on the project site would require a similar sewer hook-up at

Table V-3

Estimated Wastewater Generation - Alternative 2

Land Use	Amount of Development	Wastewater Generation Factor (gpd/unit)[a]	Average Wastewater Generation (gpd)	Peak Wastewater Generation (gpd)[b]
Condominiums[c]	100	160	16,000	27,200
Hotel (Rooms)	138	130	17,940	30,498
Hotel (Rest./Bar, etc)	10,000	0.578	5,780	9,826
Recreational Facilities	11,332	0.25	2,833	4,816
Parking	95,700	0.02	1,914	3,254
Total – Alternative 2			**44,467**	**75,594**
Proposed Project Total			**55,352**	**94,098**
Comparison (Alternative-Proposed)			**-10,885**	**-18,505**

[a] *Wastewater generation factors as described in the Wastewater analysis for the proposed project above.*
[b] *Peak wastewater generation factor is based on the wastewater generation factor multiplied by 1.7.*
[c] *Dwelling units were based on the assumption of 2 bedrooms per unit*
[d] *Wastewater generation factor is a weighted average assuming 500 gpd for 5,000 sq.ft. of bar/restaurant use; 800 gpd for 4,000 sq.ft. of banquet space; and 80 gpd for 1,000 sq.ft. of sundry sales = 578 gpd/1,000 sq.ft.*

Source: PCR Services Corporation, 2011.

Century Park East. Impacts of Reduced Project -- Residential/Hotel Alternative would be less than those of the proposed project and would also be less than significant with mitigation.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Reduced Project -- Residential/Hotel Alternative would provide less residential development than the proposed project and therefore would not meet the project's key development objective's that support local and regional plans. With less residential development, the alternative would not maximize housing within an existing activity center with existing infrastructure to reduce vehicle trips and infrastructure costs consistent with regional and state land use policies, and therefore would not achieve Objective 1. The alternative would also not provide high-density housing to the same extent as the project and therefore would not meet the housing needs of the City to the same extent as the project (Objective 2). The alternative would partially contribute to support of the Century City vision as a well-balanced, urban community in which people can "live, work, and play" (Objective 3) by adding population and visitors to the land use mix. However, the alternative would not meet the objective as well as the proposed project, as it would not contribute the same opportunity for people to live in walking distance of their work, shopping and entertainment activities. The alternative would also not meet Objectives 4 or 5 as well as the proposed project as it would not maximize residential activity in the vicinity of key public transit facilities or maximize the residential support base for the retail and entertainment activities in the project area, although hotel visitors might partake in Century City activities.

The Reduced Project -- Residential/Hotel Alternative could meet the proposed project's objective of creating a distinctive structure at a key gateway to Century City (Objective 7), but with a lower building height might

not contribute in the same manner as the proposed project. The alternative could provide street-level pedestrian activity and connectivity as called for in the 2007 Greening of Century City Pedestrian Connectivity Plan (Objective 6). However, the alternative would only partially meet the sustainability intent of Objective 10, due its lack of contribution to a land use pattern that better supports sustainability. The alternative would meet Objective 8 regarding provision of a secure, convenient urban development with state of the art recreation facilities and gardens to serve project residents (and hotel visitors), and Objective 9 regarding provision of buffering with neighboring uses. However, with the smaller full-time residential population, the alternative would likely not support the same extent of open space amenity as would the proposed project. The alternative would partially meet Objective 12 by contributing to the strengthening of the regional economy through the provision of work for the construction industry, but with its smaller building profile, not to the same extent as the proposed project. The alternative would maximize the site's in-fill development potential through utilization of all of the Replacement Trips available at the project site (Objective 11), but would not maximize economic expansion through the provision of high density housing (Objective 13).

V. ALTERNATIVES
C. ALTERNATIVE 3: REDUCED PROJECT – OFFICE – WITH EXISTING TRIPS

1. DESCRIPTION OF THE ALTERNATIVE

The Reduced Project -- Office With Existing Trips Alternative would develop an office building in place of the proposed residential building. The 2,143 Replacement Trips available for the site would allow for 153,000 sq.ft. of office space. This alternative is proposed in response to the site's C2-2-O zoning designation, the fact that this was the site's previous use, and it is indicative of a potential future use, if the proposed project does not proceed. This alternative would reduce the amount of building (and related construction impacts) required, reducing FAR area from 469,575 sq.ft. to 153,000 sq.ft., a reduction of approximately 67 percent. The office building would require 306 parking spaces. One potential arrangement would be a five story building inclusive of one subterranean level; and a floor-plate of approximately 250 feet by 210 feet (a lot coverage of about 50%).

2. ENVIRONMENTAL IMPACTS

a. Aesthetics/Visual Resources

(1) Visual Quality/Views

Under the Reduced Project -- Office with Existing Trips Alternative the visual character of the project site would be altered from its current vacant character to that of a developed appearance consistent with other office buildings adjacent to the project site. The appearance of the project site would be somewhat like that which occurred when it was constructed with a similar office building previously. The reduced project size of this alterative would result in a building that would be less prominent as seen from more distant locations, and would like the proposed project, tend to blend in with the surrounding buildings. As the height of the building would be reduced, the sense of building massing in the more immediate vicinity would be reduced. At the same time, such a building would likely result in less opens space, and smaller setbacks/landscaping along Santa Monica Boulevard and Moreno Drive, resulting in less buffering for the residential and high school uses adjacent to the project site. As the character of office development varies from that of residential development, the site appearance for this alternative would be in keeping with the offices along Santa Monica Boulevard. It would not present the same residential milieu along the project's eastern and southern boundaries.

The reduction in building height would result in less change to the aesthetic character than that of the proposed project, but would not have different impacts on views from public locations. The alternative would fill-in the project site for viewers along Santa Monica Boulevard, and like the proposed project would not block views of valued resources.

The proposed project includes mitigation measures to reduce aesthetic impacts during construction and to assure that landscaping and tree provision is consistent with City requirements and an attractive project character. Similar mitigation would be required for the alternative. Impacts of the proposed project regarding visual quality and views are less than significant with mitigation. Implementation of the Reduced Project -- Office with Existing Trips Alternative would result in impacts that would be reduced from those of

the proposed project to the extent the building would be lower in height and would also be less than significant with mitigation.

(2) Light and Glare

Under the Reduced Project -- Office with Existing Trips Alternative the project site would be developed in a manner that is consistent with typical Century City development, providing night-time lighting for site security, support of night-time uses and building highlighting. It is assumed that such a project would not require the use of highly reflective materials and would not have glare effects different those already occurring in the project vicinity. Such a building would not contribute the same level of night-time lighting into the ambient conditions as would a taller residential building. However, ground level lighting would be similar. More lighting from the proposed project's higher building levels would not be noticeable at street level; but would contribute to the overall appearance of Century City from more distant locations. The additional lighting would not have adverse effects in the local vicinity and would not necessarily be more or less attractive than the contribution of an office building that is lower in height. Thus, light and glare effects of this alternative would be similar to those of the proposed project. While the alternative would generate slightly less light without the proposed project's upper story contribution from higher level residential units, the variation in lighting would be negligible. Lighting at ground level for the alternative and the proposed project would be similar. It is assumed that the alternative would require mitigation similar to that of the proposed project to assure that site lighting and glare characteristics are consistent with City guidelines/regulations. Impacts of the Reduced Project -- Office with Existing Trips Alternative would be similar to those of the proposed project and less than significant with mitigation.

(3) Shading

Under the Reduced Project -- Office with Existing Trips Alternative shading impacts would be reduced due to the lower level of the office building. There would be no shading on the golf course north of the project site. The extent of shading impacts on the residential area east of the project site would be dependent on the precise location of the office building, but would be negligible. Further, the substantial reduction in building height to approximately 80 feet in contrast to the 460 feet of the proposed project would be sufficient to avoid shading on the single family residential unit where the 2-hour CCNSP shading standard is exceeded by the proposed project. The shading impacts of the proposed project are less than significant with regard to the L.A. CEQA significance threshold. Shading impacts of the Reduced Project -- Office with Existing Trips Alternative would be less than those of the proposed project, and would not cause the proposed project's exceedence of the CCNSP 2-hour shading standard.

b. Air Quality

Construction

The Reduced Project -- Office with Existing Trips Alternative would require a construction program inclusive of excavation, foundation preparation and building erection. The excavation program would likely be similar to that of the proposed project given the site conditions and the minimum excavation program of the proposed project. The proposed project is in large part setting its building structures onto an elevation near the existing site ground level without notable excavation for deep subterranean structures. Given the nature of the Reduced Project -- Office with Existing Trips Alternative the foundation work of the alternative

would be less than that needed for the proposed project. Further, the reduction in the heights of the alternative's structures would reduce the amount of construction required for building erection.

The proposed project includes mitigation measures to reduce air quality emissions from construction activity. Notwithstanding, the proposed project's construction activity would generate air quality emissions that would result in significant and unavoidable impacts in regard to regional NO_x and PM_{10} emissions, as well as localized levels of NO_2 and PM_{10}. Its impacts regarding the level of TACs emitted are less than significant. As the analysis of impacts on air quality addresses maximum air emissions that can occur on a day of maximum construction activity, the Reduced Project -- Office with Existing Trips Alternative would likely result in significant impacts on regional and localized air quality emissions that are similar to those of the proposed project. This is particularly true during the excavation phase, which is the phase of development that generates the greatest level of air emissions. The site preparation for any type of development with the project's soil characteristics would be similar to that of the proposed project. At the same time, the reduced construction program for the buildings would reduce the overall quantities of air emissions generated. Therefore, air quality impacts of the Reduced Project -- Office with Existing Trips Alternative would be less than those of the proposed project, but would still be considered to generate significant and unavoidable regional and localized impacts; and less than significant toxic air contaminant impacts.

Operations

The Reduced Project -- Office with Existing Trips Alternative would create a new office development. The new site uses would cause an increase in air quality emissions associated with consumption of energy for site activities and transportation to and from the project site, as well as the use of consumer products, etc. Likewise, the proposed project would generate air quality emissions due to similar types of site activity. The impacts of the proposed project due to project operations are less than significant for regional emissions, localized emissions and toxic air contaminants. In comparison, the Reduced Project -- Office with Existing Trips would generate fewer emissions for on-site activity, however, would generate more air emissions from the burning of fossil fuels associated with transportation. (As described further below, this alternative would generate substantially more traffic than the proposed project.) As the air emissions from traffic are a much larger component of the overall regional emissions generated, the air quality impacts associated with this alternative would on net be greater than those of the proposed project. Further, this alternative's provision of office space as opposed to residential development would not support the establishment of regional development patterns that contribute to reductions in air emissions, particularly greenhouse gases, in the way the proposed project would. Therefore, impacts of the Reduced Project -- Office with Existing Trips Alternative on air quality would be greater than those of the proposed project, but like the proposed project, less than significant.

c. Cultural Resources

The Reduced Project -- Office with Existing Trips Alternative would require the implementation of a construction program similar to that of the proposed project, with excavation into native soils. Therefore, the potential to encounter cultural resources would be similar to the proposed project. Under the proposed project, excavation would occur mostly in previously disturbed top soil and cultural resources are not expected to be encountered. Notwithstanding, mitigation measures to provide for collection and treatment of resources have been proposed in the unlikely event such resources should be recovered. Therefore,

impacts of the Reduced Project -- Office with Existing Trips Alternative would be similar to those of the proposed project, and like the proposed project would be less than significant with mitigation.

d. Geology/Soils

The Reduced Project -- Office with Existing Trips Alternative would be built on the same geology and soils as the proposed project, and like the proposed project would be designed to meet building safety requirements pursuant to proper engineering studies as required in a project mitigation measure. Therefore, impacts of this alternative would be similar to the proposed project, and like those of the proposed project, would be less than significant with mitigation.

e. Greenhouse Gas Emissions

The Reduced Project -- Office with Existing Trips Alternative would generate greenhouse gases due to its construction and operations. In comparison, to the proposed project, this alternative would generate fewer emissions from on-site activity, however, would generate more air emissions from the burning of fossil fuels associated with transportation. (As described further below, this alternative would generate more traffic than the proposed project.) As the air emissions from traffic are a much larger component of the overall regional emissions generated, the greenhouse gas emissions associated with this alternative would on net be greater than those of the proposed project. Further, this alternative's lower amount of residential development would not support the establishment of regional development patterns that contribute to reductions in air emissions, particularly greenhouse gases, in the way the proposed project would. Therefore, impacts of the Reduced Project -- Office with Existing Trips Alternative would be greater than those of the proposed project, but like the impacts of the proposed project, would be less than significant

f. Hazards and Hazardous Materials

The Reduced Project -- Office with Existing Trips Alternative would provide a common urban use on a site with no known contaminants, and underlying methane at a level that is common throughout the project vicinity. As such, these uses would be carried out under regulations that protect the environment from hazardous conditions. In this regard, potential impacts of this alternative are similar to those of the proposed project. The proposed project includes mitigation measures to ensure that project development proceeds in a manner that is consistent with the required regulations. Therefore, impacts of the Reduced Project -- Office with Existing Trips Alternative would be similar to those of the proposed project, and like those of the proposed project would be less than significant with mitigation.

g. Hydrology and Surface Water Quality

The Reduced Project -- Office with Existing Trips Alternative would be a typical in-fill urban project with a potential to alter drainage patterns and/or add urban surface pollutants to the water flow passing over and through the project site. Such development would be implemented pursuant to regulations for the protection of public and environmental safety and the use of Best Management Practices (BMPs) for construction and operations. In this regard, the potential impacts of this alternative are similar to those of the proposed project. The proposed project includes several mitigation measures to ensure appropriate implementation of the regulations and BMPs. In particular, the proposed project includes a biofiltration system to control water flow and provide water quality treatment. It is assumed that an alternative project at the project site would be required to include regulatory BMPs to control run-off and water quality of some

type to meet regulatory requirements. Therefore, impacts of the Reduced Project -- Office with Existing Trips Alternative would be similar to those of the proposed project, and like the proposed project would be less than significant.

h. Land Use

The Reduced Project -- Office with Existing Trips Alternative would develop the project site with an office use that is in keeping with the office functions of Century City and supportive of the vision for Century City. The alternative development would be provided within the project site, without off-site impacts. As such, there would be no changes in land use patterns and/or the arrangement of development in the surrounding community. At the same time, the office uses would be less compatible with the school and residential uses located east and south of the project site, than would a residential project. The development of such office uses, with an FAR of approximately 1.5:1, could be provided in a manner that is consistent with City regulations and policies. It is assumed that such a project would be designed to provide improved pedestrian ways along Santa Monica Boulevard and Moreno Drive providing an appropriate land use linkage to the existing office development to the west and southwest. The office uses would be a more intensive site use, with the coming and going of office workers and visitors. As indicated in the comparative impacts on traffic below, the alternative would generate approximately 64 percent more daily trips than the proposed project. The Reduced Project -- Office with Existing Trips Alternative would add to the mixed-use, milieu of Century City and provide an opportunity for approximately 612 workers to shop and attend entertainment activities in conjunction with their work trip.[8] They would also have the opportunity to reach Century City via one of the numerous public transit lines that serves the project site. However, these potential benefits to reducing the automobile trips would not provide the same contribution as the proposed project to SCAQMD, SCAG and state (AB-32) policies/goals to reduce vehicle miles traveled and associated air quality emissions. The estimated job/housing ratio for the Century City vicinity for 2015 is 12.59. This contrasts with an estimate for the entire Los Angeles County of 1.33.[9] Therefore, Century City is considered jobs/rich. Locating new housing units in jobs rich areas and new office units in housing rich areas contributes to land use patterns that reduce vehicle miles travel. Therefore, the locating of a large number of housing units within Century would provide a contribution to the preferred land use pattern that would not occur with the alternative. Also, unlike the proposed project, the alternative would not produce residential units to support City policies for meeting housing needs within the City.

The land use impacts of the Reduced Project -- Office with Existing Trips Alternative would be generally consistent with City policies and would provide an appropriate use for Century City. However, as the office use would generate an increased level of site activity, and the reduced level of residential development would provide less support for regional policies intended to reduce vehicle miles traveled, impacts of Reduced Project -- Office with Existing Trips would be considered greater than those of the proposed project. As was the case with the proposed project, impacts of the alternative would be less than significant.

[8] *The estimate of site employees is based on an office generation factor of 250 employees per 1,000 sq.ft. of office space.*

[9] *Based on SCAG data prepared for the 2008 Regional Transportation Plan (RTP). The estimates for Tract 267100 (the 2000 Census tract used in the 2008 RTP) which includes Century City as well as residential development to the east) include 332 housing units in 2015 and 40,583 employees. The estimates for Los Angeles County are 3,509,580 housing units and 4,675,875 employees.*

i. Noise

Construction

The Reduced Project -- Office with Existing Trips Alternative would require a construction program inclusive of excavation, foundation preparation and building erection. The excavation program would likely be similar to that of the proposed project given the site conditions and the minimum excavation program of the proposed project. The proposed project is in large part setting its building structures onto an elevation near the existing site ground level without notable excavation for deep subterranean structures. An office building of the type proposed would require less foundation work than the proposed project. Further, the reduction in gross square footage associated with this alternative would reduce the amount of construction required for building erection.

The proposed project includes mitigation measures to reduce noise and vibration impacts from construction activity. Notwithstanding, the proposed project's construction activity would generate noise and vibration levels that would be significant and unavoidable. As the analysis of noise impacts addresses the maximum noise levels that can occur on a day of maximum construction activity, the Reduced Project -- Office with Existing Trips Alternative would likely result in significant impacts similar to those of the proposed project. This is particularly true during the excavation phase, which is the phase of development that generates the greatest level of noise. The site preparation for any type of development with the project's soil characteristics would be similar to that of the proposed project. At the same time, the reduced construction program for the buildings would reduce the number of days over which such noise impacts would occur. Therefore, noise impacts of the Reduced Project -- Office with Existing Trips Alternative would be less than those of the proposed project, but would still be considered to be significant and unavoidable.

Operations

The Reduced Project -- Office with Existing Trips Alternative would create a new office development with an estimated 612 employees. The new site uses would cause an increase in noise associated with stationary and mobile (i.e. automobile trip) sources. Likewise, the proposed project would generate noise impacts due to similar types of site activity. The greater level of traffic associated with the office use would generate a larger contribution to the cumulative noise environment, but not enough to be discernable on its own or cause a significant impact. Impacts of stationary sound sources would be similar for the alternative and the proposed project. Therefore, the operations noise impacts of the Reduced Project -- Office with Existing Trips Alternative would be roughly similar to those of the proposed project, and like the proposed project would be less than significant.

l. Public Services

(1) Fire Protection

The Reduced Project -- Office with Existing Trips Alternative would add new population at the project site with potential need for fire and/or emergency services. The estimated site population for evaluating this alternative's impacts on fire services is 612 people.[10] Based on the existing incident factor of 0.19 response

[10] *The Los Angeles CEQA thresholds guide recommends that non-residential population be considered when evaluating impacts on police and fire services. The recommended population generation factor is 1 person per1,000 square feet of space..*

incidents per capita, the alternative would generate 116 annual incident responses. The alternative would also include construction activities that would add traffic to the local road network, potentially affecting emergency response times. In contrast, the proposed project would have a site population of 379 people, potential generating 72 incident responses per year; and construction trips that would be similar to those of the alternative on a worst-day basis, but occurring over a greater number of days. While the proposed project would add new population at the project site with potential need for fire and/or emergency services, the impacts on the delivery of fire protection services would be reduced to less than significant levels through code compliance and the implementation of design features and mitigation measures, including fire alarm systems, fire suppression systems, and sufficient fire flow capabilities. Similar measures would be applied to the alternative. Therefore, impacts on fire services would be slightly increased for the Reduced Project -- Office with Existing Trips Alternative, and like the impacts of the proposed project would be less than significant after mitigation.

(2) Police Protection

The Reduced Project -- Office with Existing Trips Alternative would add new population at the project site with potential need for police and emergency services. The estimated site population for evaluating this alternative's impacts on police services is 612 people.[11] Based on the existing incident factor of 0.025 incidents per capita, the alternative would generate 15 annual incidents requiring police responses. The alternative project would also include construction activities that would add traffic to the local road network, potentially affecting emergency response times. In contrast, the proposed project would have a site population of 379 people, potentially generating nine incidents per year, six fewer incidents per year. The proposed project would generate construction trips that would be similar to those of the alternative on a worst-day basis, but occurring over a greater number of days. The proposed project would reduce the need for police services through project design and numerous site safety features including 24-hour/7-day security service to reduce potential impacts on police services to a less than significant level. It is expected that an office development would also provide on-site security commensurate with the potential threat to safety; however an office use would not necessarily include 24-hour/7-day security or the same extent of overall security features as would the proposed project. As the number of incidents could be greater with the alternative, and the site security could be less extensive, impacts on police services would be considered greater than the proposed project. However, impacts of the Reduced Project -- Office with Existing Trips would like those of the proposed project be less than significant.

(3) Schools

The Reduced Project -- Office with Existing Trips Alternative would not include residential development. However, LAUSD considers office uses to generate students as a secondary effect although at lower levels than does residential development. Based on the LAUSD student generation factors, the alternative would be expected to generate 4 elementary school students, 2 middle school students and 3 high school students.[12] This student generation is less than that associated with the proposed project: 32 elementary students (28 more than the alternative), 16 middle school students (14 more than the alternative) and 20 high school students (17 more than the alternative. Impacts associated with both the alternative and the proposed project would be mitigated to less than significant levels via the payment of school fees at the time of

[11] *The Los Angeles CEQA thresholds guide recommends that non-residential population be considered when evaluating impacts on police and fire services. The recommended population generation factor is 1 person per1,000 square feet of space.*

[12] *Student generation rates are based on the LAUSD School Fee Justification Study, September, 2010. The generation rates for the alternative's 153,000 square feet of office space are 0.0278, 0.0139 and 0.0173, respectively.*

building permit issuance. Therefore, impacts of the Reduced Project -- Office with Existing Trips Alternative on schools would be less than those of the proposed project, and like the proposed project would be less than significant.

(4) Libraries

The Reduced Project -- Office with Existing Trips Alternative would generate an office population of 612 employees. Office workers might use local libraries going to and coming from the office, although generally, such library use would tend be less than that of a residential project. The level of service demand associated with the proposed project is nominal and would not require new facilities to meet its demand, and would be less than significant. Impacts of the Reduced Project -- Office with Existing Trips Alternative would be less than those of the proposed project and like those of the proposed project would be less than significant.

(5) Parks and Recreation

The Reduced Project -- Office with Existing Trips Alternative would generate a site population of 612 workers that might visit local park facilities on the way to and from work, although such work related recreation stops are frequently met at private gyms. In contrast, the proposed project would have 379 site residents generating demand for recreation facilities. Such project generated demand would be met through provision of extensive on-site recreation facilities (11,332 square feet of recreation space and 70,720 sq.ft. of common open space), and if needed to meet City requirements, a mitigation measure that provides for dedicated park space, payment of in-lieu fees, or on-sites improvements equivalent to the fees. Recreation facilities would likely not be provided in a smaller office building of the type considered in this alternative, although some type of small gym facility is possible. On the one hand, lacking a residential population, the site's office population would have less impact on local parks and recreation facilities. On the other hand, the proposed project would meet needs for recreation services through the combination of project design features and/or the proposed mitigation measure. Therefore, on-net, the impacts of the Reduced Project -- Office with Existing Trips Alternative would be considered similar to those of the proposed project, but less than significant.

k. Traffic and Circulation

Construction

The Reduced Project -- Office with Existing Trips would also add automobile and truck traffic to the local road system during construction. The maximum amount of traffic on any one day would be similar to that of the proposed project. At the same time, the number of days over which such impacts would occur would be reduced. The proposed project includes several mitigation measures to ensure that construction activities accommodate smooth and efficient transportation flow during construction, thus avoiding significant impacts due to construction activities. The alternative would be expected to include similar mitigation measures. Therefore, impacts of the Reduced Project -- Office with Existing Trips Alternative due to construction traffic would be less than those of the proposed project, and like those of the proposed project would be less than significant.

Operations

The trip generation for the Reduced Project -- Office with Existing Trips Alternative is shown in **Table V-4,** *Project Trip Generation – Alternative 3*. As indicated the alternative would add 1,851 daily trips with 264 trips occurring during the A.M. Peak hour and 250 trips occurring in the P.M. peak hour. The proposed project would generate 1,189 daily trips, with 96 occurring in the A.M. Peak Hour and 108 in the P.M. Peak Hour. The amount of traffic generated by the alternative would be greater than that of the proposed project by 662 daily trips, 168 A.M. peak hour trips and 142 P.M. peak hour trips. The most notable effect of the additional trips would be expected to occur at the intersections of Beloit Avenue/I-405 southbound Ramps and Santa Monica Boulevard (P.M. peak hour); Overland Avenue and Santa monica Boulevard (PM peak hour); Moreno Drive and Santa Monica Boulevard; Wilshire Boulevard and South Santa Monica; and Spalding Drive and Olympic Boulevard while potential effects in regard to significance would be less at other intersections. The notable increase in the alternatives traffic at these locations and times could be sufficient to cause a significant impact prior to mitigation. Such an office project would be required to provide feasible mitigation, and might provide for transportation management demand support. However, the additional trips of the alternative could still result in significant traffic impacts. Because the number of daily trips for this alternative are greater than those of the proposed project the Moreno Driveway may be required to be open during weekday morning and evening peak hours unlike the project's proposal to close it. This could potentially result in a traffic conflict with Beverly Hills High School pick-up/drop-off queuing along Moreno Drive that would not occur with the proposed project. It is expected that the alternative would provide parking appropriate to the site use, as would the proposed project. The alternative could potentially generate more public transit trips than the proposed project, but such additional trips would not be significant. Impacts of the Reduced Project -- Office with Existing Trips Alternative would be greater than those of the proposed project, but unlike those of the proposed project, could be significant.

Table V-4

Project Trip Generation – Alternative 3

				Trip Generation Rates [a]						Estimated Trip Generation						
				A.M. Peak Hour			P.M. Peak Hour				A.M. Peak Hour Trips			P.M. Peak Hour Trips		
Land Use	Size	ITE Code	Daily Rate	Rate	In	Out	Rate	In	Out	Daily Trips	In	Out	Total	In	Out	Total
Office																
Office Building	153 ksf	710	[b]	[c]	88%	12%	[d]	17%	83%	1,851	232	32	264	43	207	250
Total Trips, Alternative 3										**1,851**	**232**	**32**	**264**	**43**	**207**	**250**
Proposed Project Trips										**1,189**	**18**	**78**	**96**	**67**	**41**	**108**
Comparison (Alternative – Proposed Project)										**662**	**214**	**(46)**	**168**	**(24)**	**166**	**142**

[a] *Source for trip generation rates: Trip Generation, 8th Edition, Institute of Transportation Engineers (ITE), 2008, unless otherwise noted.*
[b] *ITE equation for Daily Trip Generation (office) Ln(T)=0.77 Ln(X)+3.65.*
[c] *ITE equation for A.M. Trip Generation (office) LN(T)=0.8 Ln(X)+1.55.*
[d] *ITE equation for P.M. Trip Generation (office) T=1.12(x)+78.81*
Source: Fehr & Peers, June 2011

I. Utilities and Service Systems

(1) Water Supply

The Reduced Project -- Office with Existing Trips Alternative would include office development that would generate demand for the consumption of water resources. The water demand is shown in **Table V-5**, *Estimated Water Demand - Alternative 3,* along with the water demand for the proposed project. As indicated this alternative would require the consumption of 26,190 fewer gallons per day or 35 acre feet per year. The proposed project includes numerous project design features to reduce the demand for water consumption. It is assumed that the alternative project would include similar features consistent with the nature of its proposed uses. Water infrastructure and water supply is sufficient to meet the demands of the proposed project without project mitigation; and the project impact on the provision of water services would be less than significant. Impacts of the Reduced Project -- Office with Existing Trips Alternative would be less than those of the proposed project and would also be less than significant.

Table V-5

Estimated Water Demand - Alternative 3

Land Use	Amount of Development	Water Use Factor (gpd/unit)[a]	Water Use (gpd)	Water Use (AF per year)
Office	153,000	0.15	22,950	26
Landscaping[b]	20,000	0.071	1,420	2
Parking	91,000	0.02	1,820	2
Total – Alternative 4			26,190	30
Proposed Project			58,139	65
Comparison (Alternative - Proposed Project)			-33,949	-35

[a] *Water use factors as described in the Water Supply analysis for the proposed project above.*

Source: PCR Services Corporation, 2011.

(2) Wastewater

The Reduced Project -- Office with Existing Trips Alternative would include office development that would generate wastewater that would need to be conveyed and treated. The estimated wastewater generation for this alternative is shown in **Table V-6**, *Estimated Wastewater Generation - Alternative 3,* along with the wastewater generation for the proposed project. As indicated this alternative would generate 16,665 gallons per day less than the proposed project or 30,582 gallons per day less during peak episodes of waste water generation. The proposed project's additional wastewater generation would be within the capacity limits of the sewerage and treatment facilities serving the project site, and with implementation of a mitigation measure ensuring an adequate hook-up to local main-lines would be less than significant. The alternative project, as would any development located on the project site would require a similar sewer hook-up at Century Park East. Impacts of Reduced Project -- Office with Existing Trips Alternative would be less than those of the proposed project and would also be less than significant with mitigation.

Table V-6

Estimated Wastewater Generation - Alternative 3

Land Use	Amount of Development	Wastewater Generation Factor (gpd/unit)[a]	Average Wastewater Generation (gpd)	Peak Wastewater Generation (gpd)[b]
Office	153,000	0.15	22,950	39,015
Parking	91,000	0.02	1,820	3,094
Total – Alternative 3			**24,770**	**42,109**
Proposed Project Total			**55,352**	**94,098**
Comparison (Alternative-Proposed)			**-16,665**	**-30,582**

[a] *Wastewater generation factors as described in the Wastewater analysis for the proposed project above.*
[b] *Peak wastewater generation factor is based on the wastewater generation factor multiplied by 1.7.*

Source: PCR Services Corporation, 2011.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Reduced Project -- Office with Existing Trips Alternative would not meet the project's key development objective's that support local and regional plans. The alternative would not contribute high density housing to Century City. It would not maximize housing within an existing activity center with existing infrastructure to reduce vehicle trips and infrastructure const consistent with regional and state land use policies, and therefore would not achieve Objective 1. The alternative would also not provide high-density housing to meet the housing needs of the City (Objective 2). The alternative would partially contribute to support of the Century City vision as a well-balanced, urban community in which people can "live, work, and play" (Objective 3) by adding employees to the land use mix. However, the alternative would not meet the objective as well as the proposed project. It would add a considerable number of employees to an area that would be well served by more housing. As discussed in the evaluation of Land Use impacts for this alternative above, this alternative would contribute more employment opportunities to an area that is jobs rich, where-as the proposed project, consistent with the objective, would add new population to the jobs rich area. Also, the alternative would not maximize residential activity in the vicinity of key public transit facilities (Objective 4), nor maximize the residential support base for the Century City retail and entertainment activities (Objective 5).

The Reduced Project -- Office with Existing Trips Alternative could partially meet the proposed project's objective of creating a distinctive structure at a key gateway to Century City (Objective 7), but with a substantially smaller building profile would likely not contribute in the same manner as the proposed project. The alternative could provide street-level pedestrian activity and connectivity as called for in the 2007 Greening of Century City Pedestrian Connectivity Plan (Objective 6). It could also be designed to incorporate sustainable design and construction elements consist with LEED certification criteria (Objective 10). However, the alternative would only partially meet the sustainability intent of Objective 10, due its lack of contribution to a land use pattern that better supports sustainability. The alternative would only partially meet Objective 8 regarding provision of a secure, convenient urban development with state of the art recreation facilities and gardens to serve project residents, and Objective 9 regarding provision of buffering

with neighboring uses. In both cases the alternative could provide buffering to adjacent use and some employee amenities consistent with standard office development practice, but would not provide the same level or quality of these design features as would the proposed project. The alternative would partially meet Objective 12 by contributing to the strengthening of the regional economy through the provision of work for the construction industry, but with its smaller building profile, not to the same extent as the proposed project. The alternative would maximizing the site's in-fill development potential through utilization of all of the Replacement Trips available at the project site (Objective 11), but would not meet Objective 13 regarding maximization of economic expansion through the provision of high density housing.

V. ALTERNATIVES
D. ALTERNATIVE 4: REDUCED DENSITY RESIDENTIAL

1. DESCRIPTION OF THE ALTERNATIVE

The Reduced Density Residential Alternative would reduce the amount of residential development within the project site by 25 percent. Such a reduction would reduce the number of residential units on the project site from 283 units to 212 units. The area of the residential tower would be reduced to 352,181 square feet. The alternative would use only 1,607 of the available 2,143 Replacement Trips. It is assumed that the reduction in size would be accommodated by reducing the height of the building by approximately 25 percent with the placement of buildings similar to that of the proposed project. The height of the alternative would be approximately 345 feet high. The alternative would require 531 parking spaces that would be provided within one semi-subterranean parking level and a six-story ancillary building at the same location as the proposed project's ancillary building.

2. ENVIRONMENTAL IMPACTS

a. Aesthetics/Visual Resources

(1) Visual Quality/Views

Under the Reduced Density Residential Alternative the visual character of the project site would be altered from its current vacant character to that of a developed appearance consistent with the character of the existing Century City surroundings. Like the proposed project, it would add a new tower and ancillary parking facility and include a large landscaped area to buffer the project site from surrounding uses with enhanced landscaping along the street frontages. As such, the alternative would provide a gateway structure to Century City and enhance the pedestrian milieu adjacent to the project site. In large part the alternative's aesthetic impacts would be similar to those of the proposed project. Views of the project site at ground level and in the project's near vicinity would be identical to those of the proposed project. It can be assumed that the landscaping program and architectural style of the alternative would be similar to that of the proposed project.

Minor differences in appearance between the Reduced Density Residential Alternative and the proposed project would occur from more distant locations and would be perceived as a slight reduction in the overall massing of the Century City skyline. The variation would not necessarily make the skyline more or less interesting. The reduced height of ancillary/parking building would be most noted from locations on Durant Drive in the residential area east of the project site. As viewed from this location, the reduced height of the ancillary parking structure would provide a little less massing on the project site, but would blend into the taller surrounding buildings currently surrounding the project site in a manner similar to that of the proposed project.

The proposed project includes mitigation measures to reduce aesthetic impacts during construction and to assure that landscaping and trees are provided consistent with City requirements to reflect an attractive project character. Similar mitigation would be required for the alternative. Impacts of the proposed project regarding visual quality and views are less than significant with mitigation. Implementation of the Reduced

Density Residential Alternative would result in impacts that would be slightly reduced from those of the proposed project and would also be less than significant with mitigation.

(2) Light and Glare

Under the Reduced Density Residential Alternative the project site would be developed in a manner that is consistent with typical Century City development providing night-time lighting for site security, support of night-time uses and building highlighting. It is assumed that such a project would not require the use of highly reflective materials and would not have glare effects different those already occurring in the project vicinity. Thus, light and glare effects of this alternative would be similar to those of the proposed project. The reduced lighting resulting from the slightly reduced building profile would not be sufficient to be noticeable. Lighting at ground level for the alternative and the proposed project would be similar. It is assumed that the alternative would require mitigation similar to that of the proposed project to assure that site lighting and glare characteristics are consistent with City guidelines/regulations. Impacts of the Reduced Density Residential Alternative would be similar to those of the proposed project and less than significant with mitigation.

(3) Shading

Under the Reduced Density Residential Alternative new buildings would be located on the project site in a manner somewhat similar to the proposed project. With a reduction in the height of the residential tower, the extent (length) of shadows would be reduced, reducing general shading effects. However, the general shading patterns would be similar, and impacts at locations nearer to the project site would be the same. The shading from the ancillary/parking structure of the alternative would be less than that of the proposed project however the change would not be noticeable as the ancillary/parking building is nestled within the south-east corner of the project site, away from sensitive uses and would have negligible impacts with either project. Shading impacts of the proposed project were less than significant with regard to the thresholds in the L.A. CEQA Threshold Guide, however the shading exceeded the two-hour CCNSP shading standard at one single-family family residential unit in the project vicinity; being conservatively cited as a significant impact. Impacts of the alternative would be less than those of the proposed project and like those of the proposed project would be less than significant. However, the shading of the nearby single-family unit would be similar to that of the proposed project and would also be significant. This occurs even though the alternative is lower in height, because the shading effect results from the nearby arc of the shading rather the length of the shadows. The impacts of the Reduced Density Residential Alternative would be slightly less than those of the proposed project, and like those of the proposed project would be less than significant.

b. Air Quality

Construction

The Reduced Density Residential Alternative would require a construction program inclusive of excavation, foundation preparation and building erection. The excavation program would likely be similar to that of the proposed project given the site conditions and the minimum excavation program of the proposed project. The proposed project is in large part setting its building structures onto an elevation near the existing site ground level without notable excavation for deep subterranean structures. Given the nature of the Reduced Density Residential Alternative with similar buildings to the proposed project, the foundation work of the alternative would be similar to that of the proposed project. The reduced building profiles of the residential

tower and the parking/ancillary building would slightly reduce the amount of construction needed; however the overall construction program for the buildings would be somewhat similar. As the greatest effects occur during excavation, and the reduced building profiles only lessen the construction effort a small amount the net impacts of construction on air quality emissions would be only slightly reduced.

The proposed project includes mitigation measures to reduce air quality emissions from construction activity. Notwithstanding, the proposed project's construction activity would generate air quality emissions that would result in significant and unavoidable impacts in regard to regional NO_x and PM_{10} emissions, as well as localized levels of NO_2 and PM_{10}. Its impacts regarding the level of TACs emitted are less than significant. As the analysis of impacts on air quality addresses maximum air emissions that can occur on a day of maximum construction activity, the Reduced Density Residential Alternative would likely result in significant impacts on regional and localized emissions that are similar to those of the proposed project. This is particularly true during the excavation phase, which is the phase of development that generates the greatest level of air emissions. The site preparation for any type of development with the project's soil characteristics would be similar to that of the proposed project. Therefore, air quality impacts of the Reduced Density Residential Alternative would be slightly less than those of the proposed project, and would still be considered to generate significant and unavoidable regional and localized impacts; and less than significant toxic air contaminant impacts.

Operations

The Reduced Density Residential Alternative would create a new development with residential activities. The new site use would cause an increase in air quality emissions associated with consumption of energy for site activities and transportation to and from the project site, as well as the use of consumer products, etc. Likewise, the proposed project would generate air quality emissions due to similar types of site activity. The impacts of the proposed project due to project operations are less than significant for regional emissions, localized emissions and toxic air contaminants. The Reduced Density Residential Alternative would generate emissions for on-site activity and air emissions from the burning of fossil fuels associated with transportation that would be reduced approximately 25 percent from those of the proposed project. This alternative's lower amount of residential development would not support the establishment of regional development patterns that contribute to reductions in air emissions, particularly greenhouse gases, to the same extent as the proposed project would. However, on net, impacts of the Reduced Density Residential Alternative on air quality would be less than those of the proposed project, and like the proposed project, less than significant.

c. Cultural Resources

The Reduced Density Residential Alternative would require the implementation of a construction program similar to that of the proposed project, with excavation into native soils. Therefore, the potential to encounter cultural resources would be similar to the proposed project. Under the proposed project, excavation would occur mostly in previously disturbed top soil and cultural resources are not expected to be encountered. Notwithstanding, mitigation measures to provide for collection and treatment of resources have been proposed in the off-event such resources should be recovered. Therefore, impacts of the Reduced Density Residential Alternative would be similar to those of the proposed project, and like the proposed project would be less than significant with mitigation.

d. Geology/Soils

The Reduced Density Residential Alternative would be built on the same geology and soils as the proposed project, and like the proposed project would be designed to meet building safety requirements pursuant to proper engineering studies as required in a project mitigation measure. Therefore, impacts of the Reduced Density Residential Alternative would be similar to the proposed project, and like those of the proposed project, would be less than significant with mitigation.

e. Greenhouse Gas Emissions

The Reduced Density Residential Alternative would generate greenhouse gases due to its construction and operations. Air quality emissions due to on-site activity and the burning of fossil fuels associated with transportation would be reduced by approximately 25 percent. This alternative's lower amount of residential development would not so fully support the establishment of regional development patterns that contribute to reductions in air emissions, particularly greenhouse gases, in the way the proposed project would. The establishment of higher residential densities in areas like that of the proposed project has been identified in regional plans as a means of reducing automobile vehicle trip miles. This is accomplished through the intensification of density in activity centers and along public transportation corridors. However, on-net, the impacts of the Reduced Density Residential Alternative would be less than those of the proposed project, and like the impacts of the proposed project, would be less than significant

f. Hazards and Hazardous Materials

The Reduced Density Residential Alternative would provide common urban uses on a site with no known contaminants, and underlying methane at a level that is common throughout the project vicinity. As such, these uses would be carried out under regulations that protect the environment from hazardous conditions. In this regard, potential impacts of the Reduced Density Residential Alternative are similar to those of the proposed project. The proposed project includes mitigation measures to ensure that project development proceeds in a manner that is consistent with the required regulations. Therefore, impacts of the Reduced Density Residential Alternative would be similar to those of the proposed project, and like those of the proposed project would be less than significant with mitigation.

g. Hydrology and Surface Water Quality

The Reduced Density Residential Alternative would be a typical in-fill urban project with a potential to alter drainage patterns and/or add urban surface pollutants to the water flow passing over and through the project site. Such development would be implemented pursuant to regulations for the protection of public and environmental safety and the use of Best Management Practices (BMPs) for construction and operations. In this regard, the potential impacts of this alternative are similar to those of the proposed project. The proposed project includes several mitigation measures to ensure appropriate implementation of the regulations and BMPs. In particular, the proposed project includes a biofiltration system to control water flow and provide water quality treatment. This alternative would be required to include regulatory BMPs to control run-off and water quality of some type to meet regulatory requirements, and would likely use similar BMPs to those of the proposed project. Therefore, impacts of the Reduced Density Residential Alternative would be similar to those of the proposed project, and like the proposed project would be less than significant.

h. Land Use

The Reduced Density Residential Alternative would develop the project site with residential units as would the proposed project, although at a reduced density. As is the case with the proposed project, the residential development would be a typical Century City use and would be supportive of the vision for Century City. The alternative development would be provided within the project site, without off-site impacts. As such, there would be no changes in land use patterns and/or the arrangement of development in the surrounding community. Further, the development of such uses, with an FAR of approximately 3.38:1, could be provided in a manner that is consistent with City regulations and policies. It is assumed that such a project would be designed in a manner that blends with surrounding uses and would enhance the pedestrian ways adjacent to the project site, as would the proposed project.

Due to its lower concentration of residential development within Century City, the Reduced Density Residential Alternative would not provide the same contribution as the proposed project to SCAQMD, SCAG and state (AB-32) policies/goals to reduce vehicle miles traveled and associated air quality emissions. It would also produce fewer residential units to support City policies for meeting housing needs within the City. In contrast, the proposed project would provide greater support for the desired policy driven land use patterns, by locating a larger permanent population in proximity to the Century City commercial and entertainment services, and public transit services.

With less development and population at the project site, impacts of the alternative would be considered less than those of the proposed project. At the same time, the lesser development would be less supportive of the Century City policies regarding the development of Century City as a walkable activity center. Therefore, on net, its impacts would be considered similar to those of the proposed project and as was the case with the proposed project, impacts of the alternative would be less than significant.

i. Noise

Construction

The Reduced Density Residential Alternative would require a construction program inclusive of excavation, foundation preparation and building erection. The excavation program would likely be similar to that of the proposed project given the site conditions and the minimum excavation program of the proposed project. The proposed project is in large part setting its building structures onto an elevation near the existing site ground level without excavation for deep subterranean structures. Given the nature of the Reduced Density Residential Alternative with similar buildings to the proposed project, the foundation work of the alternative would be similar to that of the proposed project. The reduced building profiles of the residential tower and parking/ancillary building would reduce the amount of construction needed; however the overall construction program for the buildings would be somewhat similar.

The proposed project includes mitigation measures to reduce noise and vibration impacts from construction activity. Notwithstanding, the proposed project's construction activity would generate noise and vibration levels that would be significant and unavoidable. As the analysis of noise impacts addresses the maximum noise levels that can occur during maximum construction conditions (heaviest equipment nearest to sensitive uses) the Reduced Density Residential Alternative would likely result in significant impacts similar to those of the proposed project. This is particularly true during the excavation phase, which is the phase of

development that generates the greatest level of noise. The site preparation for any type of development with the project's soil characteristics would be similar to that of the proposed project. Therefore, noise and vibration impacts of the Reduced Density Residential Alternative would be slightly less than those of the proposed project, and would still be significant and unavoidable.

Operations

The Reduced Density Residential Alternative would create a new development with residential activities. The new site uses would cause an increase in noise associated with stationary and mobile (i.e. automobile trip) sources. Likewise, the proposed project would generate noise impacts due to similar types of site activity. The variations in the sound levels from stationary sound sources would be negligible, and less than discernable. The fewer number of trips associated with this alternative (as discussed below) would provide a smaller contribution to the cumulative noise environment than would the proposed project. Therefore, operations noise impacts of the Reduced Density Residential Alternative would be less than those of the proposed project, and like the proposed project would be less than significant.

I. Public Services

(1) Fire Protection

The Reduced Density Residential Alternative would add new population at the project site with potential need for fire and/or emergency services. The estimated site population for evaluating this alternative's impacts on fire services would be 25 percent less than that of the proposed project, or approximately 284people. Based on the existing incident factor of 0.19 response incidents per capita, the alternative would generate 54 annual incident responses. The Reduced Density Residential Alternative would also include construction activities that would add traffic to the local road network, potentially affecting emergency response times. In contrast, the proposed project would have a number of construction trips that would be similar to those of the alternative on a worst-day basis, but occurring over a greater number of days. While the proposed project would add new population at the project site with potential need for fire and/or emergency services, the impacts on the delivery of fire protection services would be reduced to less than significant levels through code compliance and the implementation of design features and mitigation measures, including fire alarm systems, fire suppression systems, and sufficient fire flow capabilities. Similar measures would be applied to the alternative. Therefore, impacts on fire services would be slightly reduced for the Reduced Density Residential Alternative due to the reduced population size, and like the impacts of the proposed project would be less than significant after mitigation.

(2) Police Protection

The Reduced Density Residential Alternative would add new population at the project site with potential need for police and emergency services. The estimated site population for evaluating this alternative's impacts on police services would be 25 percent less than the proposed project, or approximately 284 people. Based on the existing incident factor of 0.025 incidents per capita, the alternative would generate seven annual incidents requiring police responses. The Reduced Density Residential Alternative would also include construction activities that would add traffic to the local road network, potentially affecting emergency response times. In contrast, the proposed project would have a site population of 379 people, potentially generating nine incidents per year, an increase of two incidents per year over those of the alternative. The proposed project would generate construction trips that would be similar to those of the

alternative on a worst-day basis, but occurring over a greater number of days. The proposed project would reduce the need for police services through project design and numerous site safety features including 24-hour security service to reduce potential impacts on police services to a less than significant level. The alternative would have similar project design features. Impacts of the Reduced Density Residential Alternative would be expected to have fewer police calls due to its smaller site population. Its impacts would like those of the proposed project be less than significant.

(3) Schools

The Reduced Density Residential Alternative would add new residential units at the project site, which would generate students attending public schools. The number of students would be 25 percent fewer than the proposed project: 24 elementary school students, 12 middle school students and 15 high school students. This student generation is less than that associated with the proposed project: 32 elementary students (8 more than the alternative), 16 middle school students (4 more than the alternative) and 20 high school students (4 more than the alternative. Impacts associated with both the alternative and the proposed project would be mitigated to less than significant levels via the payment of school fees at the time of building permit issuance. Therefore, impacts of the Reduced Density Residential Alternative on schools would be less than those of the proposed project, and like the proposed project would be less than significant.

(4) Libraries

The Reduced Density Residential Alternative would generate a population of 284 new residents that might use local libraries. In contrast, the proposed project would include 379 residents, 95 more residents than the alternative that might use local libraries. The level of service demand associated with the proposed project is nominal and would not require new facilities to meet its demand, and would be less than significant. Impacts of the Reduced Density Residential Alternative would be less than those of the proposed project and like those of the proposed project would be less than significant.

(5) Parks and Recreation

The Reduced Density Residential Alternative would generate a site population of 284 people that would generate a need for park and recreation facilities. This contrasts with the 379 site residents associated with the proposed project. The proposed project impacts on parks and recreation would be met through provision of extensive on-site recreation facilities (11,332 square feet of recreation space and 70,720 sq.ft. of common open space), and if needed to meet City requirements, a mitigation measure that provides for dedicated park space, payment of in-lieu fees, or on-site improvements equivalent to the fees. The alternative would likely include slightly reduced active recreation facilities due to the smaller population; but would have more outdoor open space area. The public open space obligation of the Reduced Density Residential Alternative would be less than that of the proposed project: 0.70 acres in contrast to the proposed project's 0.77 acres, or the in-lieu contributions. Therefore, the contributions for public parks could be less under the alternative than that of the proposed project. However, it is assumed that impacts of the Reduced Density Residential Alternative on park and recreation services would be similar to those of the proposed project after mitigation, and like the proposed project would be less than significant after mitigation.

k. Traffic and Circulation

Construction

The Reduced Density Residential Alternative would also add automobile and truck traffic to the local road system during construction. The maximum amount of traffic on any one day would be similar to that of the proposed project. The proposed project includes several mitigation measures to ensure that construction activities accommodate smooth and efficient transportation flow during construction, thus avoiding significant impacts due to construction activities. The alternative would be expected to include similar mitigation measures. Therefore, impacts of the Reduced Density Residential Alternative due to construction traffic would be similar to those of the proposed project, and like those of the proposed project would be less than significant.

Operations

The trip generation for the Reduced Density Residential Alternative is shown in **Table V-7**, *Project Trip Generation – Alternative 4*. As indicated the alternative would add 892 daily trips with 72 trips occurring during the A.M. Peak hour and 81 trips occurring in the P.M. peak hour. The proposed project would generate 1,189 daily trips, with 96 occurring in the A.M. Peak Hour and 108 in the P.M. Peak Hour. The amount of traffic generated by the alternative would be less than that of the proposed project by 297 daily trips, 24 A.M. peak hour trips and 27 P.M. peak hour trips. The alternative would have proportionate reductions in impacts at the intersections in the project vicinity, where impacts of the proposed project are already less than significant. It is expected that the alternative would provide access and parking appropriate to the site use as would the proposed project, and would have slightly reduced impacts on public transportation. Impacts of the Reduced Density Residential Alternative would be less than those of the proposed project, but like those of the proposed project would be less than significant.

Table V-7

Project Trip Generation – Alternative 4

				Trip Generation Rates [a]						Estimated Trip Generation						
				A.M. Peak Hour			P.M. Peak Hour				A.M. Peak Hour Trips			P.M. Peak Hour Trips		
Land Use	Size	ITE Code	Daily Rate	Rate	In	Out	Rate	In	Out	Daily Trips	In	Out	Total	In	Out	Total
Alternative 4																
Residential	100 du	222/232	4.20 [b]	0.34 [b]	19%	81%	0.38 [b]	62%	38%	892	14	59	72	50	31	81
Proposed Project Trips										**1,189**	**18**	**78**	**96**	**67**	**41**	**108**
Comparison (Alternative – Proposed Project)										**(297)**	**(4)**	**(19)**	**(24)**	**(17)**	**(10)**	**(27)**

[a] *Source for trip generation rates: Trip Generation, 8th Edition, Institute of Transportation Engineers (ITE), 2008, unless otherwise noted.*

[b] *For flexibility, the trip generation analysis uses the most conservative (highest) rates for high-rise apartments versus high-rise condominiums: ITE code 222 (high-rise apartment) for daily trips and ITE code 232 (high-rise condominium) for peak hour trips.*

Source: PCR services, August 2011, based on factors and evaluation of project impacts in the August 2011 Transportation Analysis Report by Fehr & Peers.

I. Utilities and Service Systems

(1) Water Supply

The Reduced Density Residential Alternative would include residential uses that would generate demand for the consumption of water resources. The water consumption for the residential uses would be reduced by approximately 25 percent, but the water consumption for landscaping would be increased slightly. The water demand is shown in **Table V-8**, *Estimated Water Demand - Alternative 4,* along with the water demand for the proposed project. As indicated this alternative would require the consumption of 15,517 fewer gallons per day or 17 acre feet per year. The proposed project includes numerous project design features to reduce the demand for water consumption. It is assumed that the alternative project would include similar features. Water infrastructure and water supply is sufficient to meet the demands of the proposed project without project mitigation; and the project impact on the provision of water services would be less than significant. Impacts of the Reduced Density Residential Alternative would be less than those of the proposed project and would also be less than significant.

Table V-8

Estimated Water Demand - Alternative 4

Land Use	Amount of Development	Water Use Factor (gpd/unit)[a]	Water Use (gpd)	Water Use (AF per year)
Residential [b]	212	160	33,920	38
Landscaping	33,383	0.071	2,370	3
Recreational Facilities	8,500	0.25	2,125	2
Parking	210,350	0.02	4,207	5
Total Alternative 4			**42,622**	**48**
Proposed Project			**58,139**	**65**
Comparison (Alternative - Proposed Project)			**-15,517**	**-17**

[a] *Water use factors as described in the Water Supply analysis for the proposed project above.*
[b] *Dwelling units were based on the assumption of 2 bedrooms per unit.*

Source: PCR Services Corporation, 2011.

(2) Wastewater

The Reduced Density Residential Alternative would include residential uses that would generate wastewater that would need to be conveyed and treated. The estimated wastewater generation for this alternative is shown in **Table V-9**, *Estimated Wastewater Generation - Alternative 4,* along with the wastewater generation for the proposed project. As indicated this alternative would generate 15,100 gallons per day less than the proposed project or 20,858 gallons per day less during peak episodes of waste water generation. However, the project's additional wastewater generation would be within the capacity limits of the sewerage and treatment facilities serving the project site, and with implementation of a mitigation measure ensuring an adequate hook-up to local main-lines would be less than significant. The alternative project, as would any development located on the project site would require a similar sewer hook-up at Century Park East. Impacts of Reduced Density Residential Alternative would be less than those of the proposed project and would also be less than significant with mitigation.

Table V-9

Estimated Wastewater Generation - Alternative 4

Land Use	Amount of Development	Wastewater Generation Factor (gpd/unit)[a]	Average Wastewater Generation (gpd)	Peak Wastewater Generation (gpd)[b]
Residential	212	160[c]	33,920	57,664
Recreational Facilities	8,500	0.25	2,125	3,613
Parking	210,350	0.02	4,207	7,152
Total – Alternative 4			**40,252**	**68,429**
Proposed Project Total			**55,352**	**89,287**
Comparison (Alternative-Proposed)			**-15,100**	**-20,858**

[a] *Wastewater generation factors as described in the Wastewater analysis for the proposed project above.*
[b] *Peak wastewater generation factor is based on the wastewater generation factor multiplied by 1.7.*
[c] *Dwelling units were based on the assumption of 2 bedrooms per unit*

Source: PCR Services Corporation, 2011.

3. RELATIONSHIP OF THE ALTERNATIVE TO PROJECT OBJECTIVES

The Reduced Density Residential Alternative would provide less residential development than the proposed project and therefore would not meet the project's key development objectives that support local and regional plans. With less residential development, the alternative would not maximize housing within an existing activity center with existing infrastructure to reduce vehicle trips and infrastructure costs consistent with regional and state land use policies, and therefore would not achieve Objective 1. The alternative would also not provide high-density housing to the same extent as the project and therefore would not meet the housing needs of the City to the same extent as the project (Objective 2). The alternative would partially contribute to support of the Century City vision as a well-balanced, urban community in which people can "live, work, and play" (Objective 3) by adding population and visitors to the land use mix. However, the alternative would not meet the objective as well as the proposed project, as it would not contribute the same opportunity for people to live in walking distance of their work, shopping and entertainment activities. The alternative would also not maximize residential activity in the vicinity of key public transit facilities or maximize the residential support base for the retail and entertainment activities in the project area, and thus would not meet Objectives 4 or 5.

The Reduced Density Residential Alternative could meet the proposed project's objective of creating a distinctive structure at a key gateway to Century City (Objective 7). The alternative could provide street-level pedestrian activity and connectivity as called for in the 2007 Greening of Century City Pedestrian Connectivity Plan (Objective 6). However, the alternative would only partially meet the sustainability intent of Objective 10, due its lack of contribution to a land use pattern that better supports sustainability. The alternative would meet Objective 8 regarding provision of a secure, convenient urban development with state of the art recreation facilities and gardens to serve project residents, and Objective 9 regarding provision of buffering with neighboring uses.

The alternative would not meet Objective 11 regarding maximization of the site's in-fill development potential through the use of the previously entitled Replacement Trips that are available at the project site, since the alternative would not use all of the Replacement Trips available for development of the site. The alternative would not meet Objective 12 by contributing to the strengthening of the regional economy by maximizing work for the construction industry, since the alternative would build a reduced development as compared to the project. The alternative would also not meet Objective 13 regarding maximization of economic expansion through the provision of high density housing.

V. ALTERNATIVES
F. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. The Guidelines also state that should it be determined that the No Project Alternative is the environmentally superior alternative, the EIR shall identify another environmentally superior alternative among the remaining alternatives. With respect to identifying an environmentally superior alternative among those analyzed in this Draft EIR, the range of feasible alternatives includes the No Project/No Build Alternative; the Reduced Project – Residential/Hotel Alternative, the Reduced Project – Office with Existing Trips Alternative, and the Reduced Density Residential Alternative.

A comparative summary of the environmental impacts anticipated under each Alternative with the environmental impacts associated with the proposed project is provided in Table V-10 on page V-47. A more detailed description of the potential impacts associated with each alternative is provided above. Pursuant to Section 15126.6(c) of the CEQA Guidelines, the analysis below addresses the ability of the Alternatives to "avoid or substantially lessen one or more of the significant effects" of the project.

Of the Alternatives analyzed in the Draft EIR, the No Project/No Build Alternative is considered the overall environmentally superior alternative as it would reduce the vast majority of the project impacts and avoid the project's significant short-term impacts on noise, vibration and air quality that would occur during project construction. However, as indicated above, this Alternative would not meet any of the project objectives.

In accordance with the CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project Alternative, a comparative evaluation of the remaining alternatives indicates that the Reduced Project – Office with Existing Trips Alternative would be the environmentally superior alternative, relative to the other alternatives. It would reduce the project's potentially significant noise/vibration, air quality and shading impacts to a greater extent than the other alternatives. It would reduce the two-hour CCNSP shading standard impact to a less than significant level; however the construction air quality and noise impacts would continue to be significant and unavoidable. Further, while this alternative does reduce some project impacts, it increases others. Most notably this alternative would generate more traffic than would the proposed project, and it would not contribute to the land use patterns in City and regional policies that favor the establishment of more residential development in Century City. Further, this alternative would not meet many of the objectives of the proposed project, and would only partially meet others. While the Reduced Density Residential Alternative would reduce some non-significant impacts of the project, it would not eliminate the significant shading impact as would the Reduced Project – Office with Existing Trips Alternative; and would not reduce the significant construction noise/vibration and air quality impacts to the same extent as that alternative.

Table V-10

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative 1 No Project/No Build	Alternative 2 Reduced Project - Residential/Hotel – With Existing Trips	Alternative 3 Reduced Project – Office – With Existing Trips	Alternative 4 Reduced Density Residential
A. Aesthetics/Visual Resources					
Aesthetics and Views	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
Light and Glare	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
Shading	Significant and Unavoidable	Less (No Impact)	Similar (Significant and Unavoidable)	Less (Less Than Significant)	Less (Significant and Unavoidable)
B. Air Quality					
Construction					
Regional Emissions	Significant and Unavoidable	Less (Project Impact Avoided)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Local Emissions	Significant and Unavoidable	Less (Project Impact Avoided)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)
Toxic Air Contamination	Less than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Significant and Unavoidable)	Less (Less Than Significant)

Table V-10 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative 1 No Project/No Build	Alternative 2 Reduced Project - Residential/Hotel – With Existing Trips	Alternative 3 Reduced Project – Office – With Existing Trips	Alternative 4 Reduced Density Residential
Operations					
Regional Emissions	Less than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
Local Emissions	Less than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
Toxic Air Contamination	Less than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
C. Cultural Resources					
Archaeologic/Paleontologic/Native American Resources	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
D. Geology/Soils					
Geologic Hazards	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
E. Greenhouse Gas Emissions					
Greenhouse Gas Emissions	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)

Table V-10 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative 1 No Project/No Build	Alternative 2 Reduced Project - Residential/Hotel – With Existing Trips	Alternative 3 Reduced Project – Office – With Existing Trips	Alternative 4 Reduced Density Residential
F. Hazards and Hazardous Materials					
Hazards and Hazardous Materials	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
G. Hydrology and Water Quality					
Hydrology and Water Quality	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)
H. Land Use					
Consistency with Plans	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Similar (Less Than Significant)
Land Use Compatibility	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
I. Noise					
Construction	Significant and Unavoidable	Less (No Impact)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)	Less (Significant and Unavoidable)

Table V-10 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative 1 No Project/No Build	Alternative 2 Reduced Project - Residential/Hotel – With Existing Trips	Alternative 3 Reduced Project – Office – With Existing Trips	Alternative 4 Reduced Density Residential
Operations	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Similar (Less Than Significant)	Less (Less Than Significant)
J. Public Services					
Fire Protection	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Greater (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)
Police Protection	Less Than Significant	Less (No Impact)	Greater (Less Than Significant)	Greater (Less Than Significant)	Less (Less Than Significant)
Schools	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Libraries	Less Than Significant	Less (No Impact)	Less (Less Than Significant)	Less (Less Than Significant)	Less (Less Than Significant)
Parks and Recreation	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Similar (Less Than Significant)	Similar (Less Than Significant w/ Mitigation)
K. Traffic and Circulation					
Construction	Less Than Significant w/ Mitigation	Less (No Impact)	Similar (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Similar (Less Than Significant w/ Mitigation)

Table V-10 (Continued)

Comparison of Impacts Associated with the Alternatives and Impacts of the Proposed Project

	Project Impact	Alternative 1 No Project/No Build	Alternative 2 Reduced Project - Residential/Hotel – With Existing Trips	Alternative 3 Reduced Project – Office – With Existing Trips	Alternative 4 Reduced Density Residential
Operations	Less Than Significant	Less (No Impact)	Greater (Less Than Significant w/ Mitigation)	Greater (Significant and Unavoidable)	Less (Less Than Significant)
L. Utilities (Water Supply and Wastewater)					
Water Supply	Less Than Significant	Less (No Impact)	Less (Less than Significant)	Less (Less than Significant)	Less (Less than Significant)
Wastewater	Less Than Significant w/ Mitigation	Less (No Impact)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)	Less (Less Than Significant w/ Mitigation)

Source: PCR Services Corporation, 2011.

VI. Other Environmental Considerations

VI. OTHER ENVIRONMENTAL CONSIDERATIONS

A. SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the CEQA Guidelines requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less than significant level. Following is a summary of the impacts associated with the proposed project that were concluded to be significant and unavoidable. These impacts are also described in detail in Section IV, Environmental Impact Analysis, of this EIR.

Air Quality: As analyzed in Section IV.B, Air Quality, even with the implementation of the recommended mitigation measures during construction activities, the project would, on a temporary basis, exceed the SCAQMD regional significance thresholds for NO_x and PM_{10} during the most intense construction periods. In addition, even with incorporation of mitigation measures, during project construction NAAQS and CAAQS thresholds for localized NO_2 impacts would be exceeded. These impacts would also be short-term in nature. Therefore, construction-related impacts to air quality would have a significant unavoidable impact. Please refer to Section IV.B, Air Quality, of this Draft EIR for further discussion of this topic.

Noise: As analyzed in Section IV.G, Noise, even with the implementation of the recommended mitigation measures, project construction activities would intermittently increase the daytime noise levels above the 5-dBA significance criterion at both the Beverly Hills Science & Technology Center (R3) and multi-family residential uses (R2). Further, the analysis of vibration includes recommended mitigation measures that are generally expected to reduce vibration levels to less than significant levels. Notwithstanding, it is conservatively noted that vibration significance levels may on occasion be exceeded, particularly if vibration sensitive equipment is used within the northern-most parts of the Science and Technology Center. Although temporary, such noise/vibration impacts during construction would be significant and unavoidable. Please refer to Section IV.G, Noise, of this EIR for further discussion of this topic.

Shading: As analyzed in Section IV.A, Aesthetics/Visual Resources, the project would cause shading on a single-family residential unit in the City of Beverly Hills for longer than a two-hour shading standard provided in the Los Angeles CCNSP. The shading would not adversely affect shade-sensitive uses and would not exceed the CEQA significance shading thresholds of the Cities of Los Angeles or Beverly Hills. Further, the two-hour standard is not included within Beverly Hills policies. Notwithstanding, exceeding the two-hour standard has been conservatively identified as a significant shading impact. Please refer to Section IV.A, Aesthetics/Visual Resources, of this EIR for further discussion of this topic.

B. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

In addition to identification of the project's significant unavoidable impacts, Section 15126.2(b) of the CEQA Guidelines also requires a description of the reasons why the project is being proposed, notwithstanding significant unavoidable impacts associated with the project. As described further below, this project is being proposed, not withstanding its significant unavoidable impacts, because: 1) the project would achieve a considerable number of community related project objectives; and, 2) the significant unavoidable impacts

are in two cases, associated with short-term construction activities, typical of those that would occur with any construction at the project site; and in the third case is associated with an environmental impact that would not be considered a significant impact on the physical environment under CEQA thresholds for the evaluation of shading impacts in the Cities of Los Angeles and Beverly Hills.

The project's purpose and objectives are included in Section II, Project Description, of this Draft EIR. The project's underlying purpose is "to develop higher density housing in Century City allowing convenient access by residents to jobs, retail services, entertainment, public transportation and freeways." Among the project's community related objectives identified are the following: Assist Century City in achieving its original vision of being a well-balanced, urban community in which people can "live, work, and play;" improve street-level pedestrian connectivity and activity as called for in the 2007 Greening of Century City Pedestrian Connectivity Plan; encourage the use of alternative forms of transportation by project residents, given close proximity to employment, retail and entertainment uses, and public transportation; support regional mobility goals by locating housing in an activity center where it will reduce vehicle trips and infrastructure costs, with full allocation of entitled Replacement Trips that are available at the project site; build a distinctive structure at a key gateway to the City of Los Angeles; provide high-density housing that contributes to the housing needs of the City, consistent with the development objectives of the CCNSP. Economic objectives include: strengthening of the economic vitality of the region by maximizing work for the construction industry; and accommodating future economic expansion by providing high density housing within a community that has the necessary infrastructure to support the development.

Further, the project design includes numerous features to create an attractive environment through design and provision of open-space; and numerous features, including achieving the standards of Leadership in Energy and Environmental Design (LEED) certification by the U.S. Green Building Council, contribute to the sustainability objectives of the City.

As noted above, the significant impacts associated with the project are short-term air quality and noise/vibration impacts. Long-term impacts associated with project operations in the future would be less than significant for all topics other than exceeding of the two-hour shading standard, which is not expect to have an adverse impact on the physical environment. The construction impacts occur due to the operation of construction equipment and site grading in proximity to nearby sensitive uses. These impacts would occur with other development projects that might be proposed for the project site; and they are typical of construction activities that occur with most development throughout the region.

Several alternatives to the proposed project were considered in Section V, Alternatives, of this Draft EIR. Among those alternatives, no feasible alternative was identified that would eliminate the significant unavoidable construction effects of the proposed project (see Section VI.A, above). The alternatives analysis indicated that even substantial reductions in building massing would not eliminate exceeding of the CCNSP 2-shading standing; such impact being avoided with only a very small building not consistent with community and project objectives. Furthermore, none of the alternatives would achieve the project objectives to the same extent as would the proposed project. In addition, since the No Project Alternative would not meet any of the underlying objectives of the project, it is not considered a feasible development alternative.

C. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

According to Sections 15126(c) and 15126.2(c) of the CEQA Guidelines, an EIR is required to address any significant irreversible environmental changes that would occur should the proposed project be implemented. As stated in CEQA Guidelines Section 15126.2(c) indicates:

"[u]ses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter likely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified."

The project would necessarily consume limited, slowly renewable and non-renewable resources. This consumption would occur during the construction phase of the project and would continue throughout its operational lifetime. Project development would require a commitment of resources that would include: (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the project site. Project construction would require the consumption of resources that are non-replenishable or may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Furthermore, nonrenewable fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment, as well as the transportation of goods and people to and from the project site.

Project operation would continue to expend nonrenewable resources that are currently consumed within the City of Los Angeles. These include energy resources such as electricity and natural gas, petroleum-based fuels required for vehicle-trips, fossil fuels, and water. Fossil fuels would represent the primary energy source associated with both construction and ongoing operation of the project, and the existing, finite supplies of these natural resources would be incrementally reduced. Project operation would occur in accordance with Title 24, Part 6 of the California Code of Regulations, as wells as numerous local regulations and proposed project design features which establish conservation practices that would limit the amount of energy consumed by the project. However, the energy requirements associated with the project would still represent a long-term commitment of essentially nonrenewable resources.

Continued use of such resources would be on a relatively small scale and consistent with regional and local growth forecasts in the area, as well as state and local goals for reductions in the consumption of such resources. Further, the project would not affect access to existing resources, nor interfere with the production or delivery of such resources.

The project includes numerous project design features that would reduce the consumption of non-renewable resources. Most notably, the proposed project would provide high density housing within a mixed-use regional center containing commercial and entertainment activities, as well as residential and office high-rise towers. The project site is located within SCAG's 2% Strategy Opportunity Area, an area identified as preferred for high density development to reduce vehicle miles traveled and related consumption of renewable resources, among other goals. Given, its location, the project would support pedestrian access to

a considerable range of retail and entertainment activities. The project also provides excellent access to the regional transportation system as it is located in proximity to numerous bus lines and the proposed extension of the Westside subway system (Purple Line). These factors would contribute to a land use pattern that is considered to reduce the consumption of non-renewable resources. Also, if implemented, the project's Automated Parking Option would further reduce the consumption of non-renewable resources. Hence, the consumption of the nonrenewable resources would not result in significant irreversible changes to the environment.

D. GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires an EIR to discuss the ways the proposed project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. Growth-inducing impacts include the removal of obstacles to population growth (e.g., the expansion of a wastewater treatment plant allowing more development in a service area) and the development and construction of new service facilities that could significantly effect the environment individually or cumulatively. In addition, growth must not be assumed as beneficial, detrimental, or of little significance to the environment.

The proposed project would involve the development of 283 multi-family residential units at 10000 Santa Monica Boulevard in Century City. The development of new residential units would not cause a progression of growth beyond the project itself. The project site is located in a very urbanized area that is served by current infrastructure (e.g., roads and utilities), and community service facilities (e.g., police, fire, schools, and libraries). The project's only infrastructure improvements would consist of tie-ins to the existing utility main-lines already serving the project area.

The proposed project's 283 residential units would generate a residential population of approximately 379 new residents. This generated population growth would not exceed the established SCAG regional forecast for the City of Los Angeles or the Century City Community Plan area. Further, the project is being developed consistent with the provisions of the CCNSP which includes a program to limit development within Century City under a system of Cumulative Automobile Trip Generation Potential (CATGP); and which ties growth allowed under the CATGP to the planned infrastructure that serves Century City.

Therefore, the project would not spur additional growth in Century City other than that already anticipated in the CCNSP, and would not eliminate impediments to growth. Therefore, the project would not foster growth inducing impacts.

E. POTENTIAL SECONDARY EFFECTS

Section 15126.4(a)(1)(D) of the CEQA Guidelines requires mitigation measures to be discussed in less detail than the significant effects of the proposed project if the mitigation measure(s) would cause one or more significant effects in addition to those that would be caused by the project as proposed. With regard to this section of the CEQA Guidelines, the proposed project mitigation measures that could cause potential impacts were evaluated. The following provides a discussion of the potential secondary effects that could occur as a result of the implementation of the project mitigation measures. For the reasons stated below, it is concluded that the project's mitigation measures would not result in significant secondary impacts.

1. Aesthetics/Visual Resources

Mitigation Measures A-1 through A-8 provide environmental protections for the appearance of the project site during construction and project operations. As such the mitigation measures would reduce adverse environmental effects. The only construction activity associated with the mitigation measures is the construction of a temporary, aesthetically treated construction fence (Mitigation Measure A-1). Construction of this fence is a very minor site improvement with negligible construction activity; and which falls within the construction program addressed in the environmental analyses in Section IV of this Draft EIR.

2. Air Quality

Mitigation Measures B-1 through B-17 require that project construction practices be carried out in a manner that reduces the level of air quality emissions. As such these mitigation measures would directly reduce environmental impacts of the proposed project and would not result in secondary impacts for their implementation. The consumption of water for dust suppression, Mitigation Measures B-11 and B-12, would be negligible and was considered in the evaluation of the project's water consumption in Section IV of this Draft EIR.

3. Cultural Resources

Mitigation Measures C-1 through C-3 establish protections for cultural resources through monitoring plans to identify cultural resources should they be present on the project site and treatment of resources should they be encountered. The mitigation measures assure that resources would be treated consistent with CEQA guidelines, regulatory provisions for the protection of resources and provision of the State Health and Safety Code. They would require no new construction, and would have no impact on the environment.

4. Geology/Soils

Mitigation Measure D-1 requires that the proposed project be designed in a manner that adequately addresses the geologic and conditions at the project site in a manner that is consistent with building regulations that protect the public safety. Implementation of this mitigation measure would result in project design features that have been considered and evaluated in the assessments of the individual, topical analyses in Section IV of this Draft EIR, e.g. the noise and air quality impacts of the expected construction practices. There would be no other impacts beyond those already considered in Section IV of the Draft EIR.

5. Global Climate Change

Impacts regarding Global Climate Change are less than significant and no mitigation measures are required. Therefore, no secondary impacts would occur due to the implementation of mitigation measures for this environmental topic.

6. Hazards and Hazardous Materials

Mitigation Measures D-1 and D-3 provide measures to protect construction workers and the public from exposure to hazardous material. Mitigation Measure D-2 requires that the project design include a methane protection system that would protect the public safety. These measures were considered as components of

the project design features evaluated in Section IV of this Draft EIR. Thus, implementation of hazards and hazardous materials-related mitigation measures would not result in significant secondary effects.

7. Hydrology and Water Quality

Mitigation Measures G-1 and G-2 require the project to be constructed pursuant to a Stormwater Prevention Pollution Plan (SWPPP) and a Standard Urban Stormwater Mitigation Plan (SUSMP); thus assuring conformance with regulatory measures, and Best Management Practices for control of flooding and potential water contamination. Mitigation Measure G-3 requires the implementation of biofiltration planters to control potential flooding and water contamination. Mitigation Measures G-4 through G-6 require certain signage/stenciling of drainage features and operations practices to avoid contamination of surface water flow. All of these measures are standard construction practices for avoiding adverse impacts due to flooding and water contamination; and fall within the range of practices considered in evaluating the project's direct impacts in Section IV of this Draft EIR. As such, no potential secondary effects would result.

8. Land Use

No mitigation measures would be required with respect to land use as 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. As such, no potential secondary effects would result.

9. Noise

Mitigation Measures I-1 through I-6 identify project procedures to be followed during construction to avoid noise impacts at residential and Beverly Hills High School locations during project construction. As such, they would reduce project impacts. The only construction activity associated with the mitigation measure is the construction of temporary noise barriers around the project site (Mitigation Measure I-4). Construction of these barriers are very minor site improvements with negligible construction activity; falling within the construction program addressed in the environmental analyses in Section IV of this Draft EIR. Therefore, no secondary impacts would result.

10. Public Services

(a) Fire Protection

Mitigation Measures J.1-1 through J.1-3 requires the project to consult with the LAFD and incorporate fire prevention and suppression features, and comply with all applicable State and local codes and ordinances found in the Fire Protection and Fire Prevention Plan. Mitigation Measure J.1-4 requires coordination with LADWP to install a fire hydrant in compliance with the LAFD and LADWP. Implementation of the mitigation measures would ensure that the proposed project would not result in any significant impacts to fire protection and emergency services. These mitigation measures would assure that the project meets all safety requirements; would not result in significant secondary impacts.

(b) Police Protection

No mitigation measures would be required as potential impacts to police protection would be less than significant. Therefore, no secondary impacts would result.

(c) Schools

No mitigation measures would be required as the project would be in compliance with SB 50, with project mitigation provide through the payment of fees. Therefore, no potential secondary impacts would result.

(d) Libraries

No mitigation measures would be required as potential impacts to libraries would be less than significant. Therefore, no secondary impacts would result.

(e) Parks and Recreation

Mitigation Measure J.5-1 requires the Applicant do one or more of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees. To the extent that this mitigation measure is met through the value of on-site improvements, such improvements are project design features evaluated in Section IV of this Draft EIR. To the extent that the mitigation measure is met through off-site contributions, such contributions would contribute to the overall provision of park and recreation services by the City. The measure is not expected to directly cause the construction of new park facilities; and if the City were to use such funds as a negligible contribution to new parks it would be as part of an overall parks plan subject to environmental review, and would be considered speculative at this time. Therefore, this mitigation measure would not result in any secondary impacts, not otherwise considered.

11. Traffic and Circulation

Mitigation Measures K-1 through K-7 identify project procedures to be followed during construction to avoid traffic impacts in the vicinity of the project site during project construction. They would limit roadway movements and control the movement of construction traffic. As such, they would reduce project impacts; and would lessen off-site impacts.

12. Utilities and Service Systems

(a) Water Supply

Impacts regarding water supply are less than significant and no mitigation measures are required. Therefore, no secondary impacts would occur due to the implementation of mitigation measures for this environmental topic.

(b) Wastewater

Mitigation Measure L.2-1 requires the project to provide sewer hook-ups, pursuant to City of Los Angeles Bureau of Engineering requirements regarding regulations and design standards. The proposed project

would require a new sewer-line from the corner of the project site to the existing main-line in Century Boulevard East. The sewer line would be implemented with boring techniques and use of the median in Santa Monica Boulevard to avoid traffic impacts. A small amount of construction work would occur within the roadways; however it would not be necessary to close any streets from travel. Notwithstanding, it may be necessary to realign traffic movements, or close an individual lane for very short durations. The total time duration for constructing the sewer line would be two to three weeks, with impacts to roadways occurring on and off within the overall construction schedule. Impacts to roadways would be reduced through implementation of the project's construction management plan, Mitigation Measure IV.K-7, to provide off-peak scheduling of work activities in the roadways and traffic control as needed. This improvement was considered in the evaluation of project impacts and in preparation of Mitigation Measure IV.K-7. The improvements would be implemented within the highly traveled right-of-way, adjacent to existing office development; not in the vicinity of air quality/noise sensitive land uses. Therefore, the impacts of implementation of Mitigation Measure L.2-1 would not be considered significant secondary impacts.

F. EFFECTS FOUND NOT TO BE SIGNIFICANT

Section 15128 of the CEQA Guidelines states that an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. An Initial Study was prepared for the project and is included in Appendix A of this Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR. The City of Los Angeles determined that the project would not result in potentially significant impacts related to Agricultural Resources, Biological Resources, Cultural Resources (Historic Resources), Mineral Resources, Population and Housing, and Utilities (Solid Waste and Other Utilities and Service Systems). The basis for these conclusions is discussed below.

1. Agricultural and Forestry Resources

The project site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program. Therefore, the proposed project would not convert Farmland to non-agricultural uses. Furthermore, the project site is designated Regional Center commercial in the General Plan and is zoned Commercial (C2-2-O). The C2 portion of indicates a zoning for commercial uses (multi-family residential uses are also permitted within this zone). The second part of this zoning designation, "2", indicates that the site is located in Height District No. 2, which includes a maximum FAR of 6.0:1 and unlimited building height. The third part of this zoning designation indicates that the project site is within a Supplemental Oil Drilling District (O). Agricultural uses are not permitted within C2-2-O, and the project site is not under a Williamson Act contract. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. No agricultural resources or operations currently exist on or near the project site, which is located in Century City, a highly urbanized regional center. Therefore, the proposed project would not involve changes in the existing environment that would result in the conversion of Farmland to non-agricultural use.

2. Biological Resources

The project site has previously been developed with office, restaurant and parking uses and is currently graded with very limited ornamental landscaping. Because of the urbanized nature of the project site and

surrounding area, the site does not serve as a habitat for candidate, sensitive, or special status species. Furthermore, the project site does not contain any riparian habitat or other sensitive natural communities as indicated in the City or regional plans or in regulations by the California Department of Fish and Game (CDFG) or U.S. Fish and Wildlife Service (USFWS). Hence, the project site is not located in or adjacent to a Significant Ecological Area (SEA) as defined by the City of Los Angeles nor does it contain any wetlands as defined by Section 404 of the Clean Water Act. In addition, the lack of a major water body and the limited number of trees does not contain substantial habitat for native resident or migratory species, or native nursery sites. No locally protected biological resources, such as oak trees or California walnut woodlands, exist on the site. The project site is not located within a habitat conservation plan, natural community conservation plan, or other approved local, regional, or State habitat conservation plan. As such, no impacts to biological resources would occur due to project development.

3. Cultural Resources (Historic Resources),

Currently, the project site is vacant and has been graded and enclosed with construction fencing. The project site was previously occupied by a multi-story building containing approximately 130,500 square feet of office and restaurant space, and a two-story parking structure. These buildings were removed at the end of 2005 by a previous owner of the property. Due to the lack of structures on the project site, proposed development on the project site would not alter any defined historical resources. Furthermore, a records search conducted through the South Central Coastal Information Center (SCCIC) at California State University Fullerton (CSUF) revealed that there are no recorded historic resources within the project site.[1]

Development in Beverly Hills adjacent to the project site includes Beverly Hills High School on the south, and a multi-family residential area to the east, both lying along Moreno Drive. Several of the high school buildings within the school campus have been determined eligible for listing in the National Register as contributors to a district in surveys done for the Beverly Hills Unified School District in the 1990s. The High School's new Science and Technology Building located directly south of the project site is not included in this list of eligible buildings. While not designated as a historic resource, a 2004 Survey prepared for the City of Beverly Hills identified the multi-family residential area east of the project site as a potential local district known as the Speedway Tract (Tract 7710). The proposed project would not require demolition or alteration of any off-site structures including those of the school and residential neighborhood. Further, the proposed project lies within Century City, and is typical of high rise developments throughout Century City. Century City is a distinct area from the school and residential areas, and its existing setting character would not be altered. The foremost project feature adjacent to the high school and residential area is the project's large landscaped open space area, which provides buffering between the project buildings and surrounding uses. The view of the project site from Durant Drive would be toward the project's open space area with existing Century City high rise buildings in the background and the project's ancillary building blending in. Northward views of the project site from the school and along Moreno Drive would be toward the high school's new Science and Technology Building with the project's open space area lying beyond and the project's residential building laying adjacent to other high–rise buildings along Santa Monica Boulevard. The Beverly Hills Hotel, a historic resource, is located at a substantial distance from the project site, and is isolated from the project site due to intervening uses. As such, the proposed project would not cause a

[1] *The records search included a review of the California Points of Historical Interest, the California Historical Landmarks, the California Register of Historical Places, the National Register of Historic Places, and the California State Historic Resources Inventory. The records search is discussed further in Appendix C, Cultural Resources – Cultural Resources Assessment.*

substantial adverse change in the significance of historical resources as defined in CEQA Guidelines Section 15064.5.

4. Mineral Resources

The project site is not classified by the City of Los Angeles as an area containing significant mineral deposits, nor is the site designated as an existing mineral resource extraction area by the State of California. Additionally, the project site is designated for Regional Center Commercial uses within the City of Los Angeles General Plan Framework and the West Los Angeles Community Plan, and is not designated as a mineral extraction land use. Project implementation would not result in the loss of availability of a known mineral resource of value to the region and residents of the State, nor of a locally important mineral resource recovery site. Hence, no impacts to mineral resources would occur.

5. Population and Housing

The proposed project site is vacant and devoid of existing residential development or site population. As such, the project would not cause the displacement of population, nor create a need for replacement housing.

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.

The project would be subject to the provisions of the CCNSP. The CCNSP provides phasing procedures to ensure the orderly growth of Century City consistent with the availability of new infrastructure to meet development needs. In particular, it establishes certain development rights for the entire Specific Plan area and a provision for the Transfer of Development Rights. These features allow Century City to develop in a way which fulfills its mission as a regional center, while at the same time capping the level of activity so as not to exceed the capacity of the planned infrastructure or otherwise anticipated environmental impacts. The CCNSP generally regulates development by assigning a certain number of Trips to properties within the CCNSP area that establish the development rights. The project site has a recorded covenant and agreement that provides for 2,143.4616 Replacement Trips under the CCNSP, and development of the project would not exceed those Replacement Trips. Therefore, the project development is accounted for and anticipated in the Specific Plan, and will be served by existing infrastructure (i.e., roadways, utility lines, etc.). As such, the project development is accounted for in regional planning projects in the SCAG Regional Transportation Plan (RTP), which serve as the basis for provision of services at the regional level. The proposed project would include infrastructure connections and minor improvements to accommodate project residents and improvements, but new infrastructure that could indirectly induce substantial population growth is not proposed.

Additionally, as stated in governing regional and local planning documents, including the City of Los Angeles General Plan Housing Element, the City is in need of new housing units to serve both the current population and the projected population. While the project would not eliminate the housing shortage in the City, it

would promote the goal of generating more housing. Therefore, the project's impacts regarding population growth would be less than significant.

6. Utilities and Service Systems

(a) Solid Waste

Construction Impacts

Construction of the proposed project would require earthwork and construction of new buildings on the project site. No demolition would be required as the project site is currently vacant. Each of these activities would generate construction waste including but not limited to soil, wood, paper, glass, plastic, metals, and cardboard that would be disposed of in the County's unclassified landfills (or a private inert landfill as an option with less impact on the public system). Utilizing generation factors established by the Environmental Protection Agency (EPA) and California Integrated Waste Management Board (CIWMB), the amount of Construction waste anticipated to be generated by the project would be 11,550 tons of soil and 1,780 tons of construction debris for a combined total of 13,330 tons of waste. These numbers do not take into account the amount of construction waste that could potentially be diverted via source reduction and recycling programs within the City.

As described in the Los Angeles County Integrated Waste Management Plan 2008 Annual Report, the remaining disposal capacity for the County's unclassified landfills is 57.215 million tons, exclusive of private facilities that also take in inert waste. The project's total solid waste disposal need during construction would represent approximately 0.2 percent of the 2008 estimated remaining capacity. Based on the average 2008 unclassified landfill disposal rate, unclassified landfills would have adequate capacity for the next 325 years and would not face capacity shortages.[2] Therefore, the County's unclassified landfills would have adequate capacity to accommodate project-generated inert waste; and construction impacts relative to solid waste would be less than significant.

Operation

The project would provide 283 residential units generating typical level of household waste. It is estimated that the proposed residential uses would generate approximately 206.6 tons of waste material per year. These numbers do not take into account the amount of solid waste that could potentially be diverted via source reduction and recycling programs within the City. The City is currently implementing policies aimed at achieving 70 percent to 90 percent reduction per year. The project's annual solid waste generation would be a negligible 0.0001 percent increment of the remaining 154,386,000 ton capacity in the County's Class III landfills. The most recent Integrated Waste Management Plan annual report, the 2008 Annual Report, concluded that there is sufficient capacity to meet demand through 2014 under status quo conditions. Sufficient capacity to meet the needs through the 2023 will be available by permitting and developing all proposed in-County landfill expansions, utilizing available or planned out-of-County disposal capacity,

[2] *By dividing the 2008 total remaining disposal capacity for unclassified landfills (57.215 million tons) by the 2008 total disposal rate (0..176 million tons), unclassified landfills have capacity for another 325 years until the remaining unclassified landfill capacity is depleted.*

developing the necessary infrastructure to facilitate exportation of waste to out-of-County landfills, and developing conversion and other alternative technologies.

(b) Other Utilities and Service Systems

Electricity transmission to the project site is provided and maintained by LADWP. Future plans regarding the provision of electrical services are presented in regularly updated *Integrated Resources Plans (IRPs)*. These Plans identify future demand for services and provide a framework for how LADWP plans on continuing to meet future consumer demand. The LADWP April 2010 forecast, as presented in the 2010 IRP, indicates a 2017 demand for approximately 25,000 GWh per year.[3] Based on generation factors provided in the 1993 SCAQMD CEQA Air Quality Handbook, the project's estimated energy consumption is 1,592 MWh per year. This would be approximately .006 percent that of the estimated 2017 demand of 25,000 GWh per year. This amount is negligible, and is within the anticipated service capabilities of LADWP, as presented in the IRP.

Natural gas is provided to the project site by the Southern California Gas Company (SoCal Gas). Planning for the provision of natural gas occurs through the *Integrated Energy Policy Report*, and the *Final Natural Gas Market Assessment* which supports the development of that plan. Planning is performed for 10 year horizons. As indicated in the 2007 reports, during the 2007-2017 forecast periods, all major pipeline systems serving California, except the Kern River pipeline, would operate at usage rates between 60 and 70 percent. Due to the recent slowdown in the economy, gas consumption is reduced from the 2007 level. Based on the *California Energy Commission 2007 Natural Gas Market Assessment*, SoCal Gas is projected to have a supply of 2,399 million cubic feet per day (MMcfd) or 875.6 billion cubic feet per year (Bcfy) of natural gas supply in 2017 and a demand for use of 2,351 MMcfd or 858.1 Bcfy.[4] Based on generation factors provided in the 1993 SCAQMD CEQA Air Quality Handbook, the project's estimated use of natural gas is 13,623 kcfy per year. This amount would be approximately .0016 percent that of the estimated 2017 demand of 858.1 Bcfy. This amount is negligible, and is within the anticipated service capabilities of SoCal Gas.

The electricity and natural gas demand estimates for the proposed project presented here do not take into account the energy conservation measures that would be incorporated into the project. Therefore, the actual electricity and natural gas demands of the proposed project are anticipated to be less than estimated. Furthermore, utility providers are required to plan for necessary upgrades and expansions to their systems to ensure that adequate service would be provided. As such, the proposed project would have a less than significant impact on the consumption of electricity and natural gas resources.

[3] *LADWP, 2010 Integrated Resources Plan, Figure 2-1.*

[4] *California Energy Commission, California Energy Demand 2008-2018 Staff Revised Forecast, Staff Final Report, November 2007. CEC-200-2007-015-SF2.*

VII. References

VII. REFERENCES

Bay Delta Conservation Plan. http://baydeltaconservationplan.com. Accessed April 25, 2011.

Bies, David and Hansen, Colin, *Engineering Noise Control*, 1988.

California Code of Regulations, Title 24 Part 11, Green Building Standards Code, 2010.

California Air Resources Board, *Ambient Air Quality Standards, Air Quality and Land Use Handbook*, February, 2005.

California Air Resources Board, Cancer Inhalation Risk, http://www.arb.ca.gov/toxics/cti/hlthrisk/cncrinhl/riskmapviewfull.htm.

California Air Resources Board, Planning and Technical Support Division Emission Inventory Branch, *Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (Assembly Bill 32)*, October 19, 2007.

California Climate Action Registry, Climate Action Leaders, http://www.climateregistry.org/about/members/climate-action-leaders.html. Accessed April 26, 2011.

California Climate Action Registry, *General Reporting Protocol Version 3.*1, 2009.

California Department of Transportation (Caltrans), *Technical Noise Supplement* (TeNS), 1998.

California Education Code Section 17620(a)(1).

California Environmental Protection Agency, Air Resources Board, *Greenhouse Gas Inventory Data - 2000 to 2008*, http://www.arb.ca.gov/cc/inventory/data/data.htm. Accessed 2010.

California Environmental Protection Agency, Air Resources Board *Verification Procedure - Level 3,* http://www.arb.ca.gov/diesel/verdev/level3/level3.htm

California Government Code § 65996.

California Health and Safety Code §§ 39650 et seq.

California Public Resources Code § 5024.1(a).

California Public Resources Code § 5024.1(b).

California Public Resources Code § 5024.1(d).

California State Water Resources Control Board, *20 x 2020 Water Conservation Plan*, February 2010. http://www.swrcb.ca.gov/water_issues/hot_topics/20x2020/docs/20x2020plan.pdf.

City of Beverly Hills, *General Plan Update Technical Background Report, Chapter 4.2: Recreation and* Parks, October, 2005.

City of Beverly Hills, *General Plan,* Adopted January 12, 2010.

City of Beverly Hills, *Beverly Hills Hilton Revitalization Plan Draft EIR*, August 2007.

City of Los Angeles, *CEQA Thresholds Guide*, 2006.

City of Los Angeles, Bureau of Engineering, *2002 Proposition Q Citywide Public Safety Bond Program, Proposition Q Monthly Progress Report,* February/March 2011, http://www.lapropq.org/modules/fileUpload/files/Prop_Q_Monthly_Report_FebMar11.pdf; accessed April 6, 2011.

City of Los Angeles, Bureau of Engineering, Special Order No. 006-0691, Planning Period, Flow, and Design Criteria for Gravity Sanitary Sewers and Pumping Plants, effective June 6, 1991.

City of Los Angeles, Department of City Planning, "Century City Trip Allocations" table, revised January 1, 2010; and "Century City North Specific Plan, Summary of Available Trips by Parcel," table revised January 1, 2010.

City of Los Angeles, Department of Public Works, Bureau of Sanitation, *City of Los Angeles Integrated Resources Plan - Executive Summary,* December 2006". http://www.lacity.org/san/irp/; accessed April and May 2011.

City of Los Angeles, Department of Public Works, Bureau of Sanitation, *Wastewater, About Wastewater, Facts and Figures,* http://www.ci.la.ca.us/san/wastewater/factsfigures.htm; accessed May 2011.

City of Los Angeles, Department of Public Works, *Hyperion Treatment Plant 5-Mile Outfall Inspection and Diversion to 1-Mile Outfall Fact Sheet*, November, 2006. http://www.lasewers.org/treatment_plants/hyperion/5-mile-outfall/hyperion_outfall_inspection_facts. pdf; accessed May, 2011.

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

City of Los Angeles, Department of Public Works, "Wastewater, About Wastewater, Facts and Figures," http://www.ci.la.ca.us/san/wastewater/factsfigures.htm; Accessed May 2011.

City of Los Angeles, Department of Public Works, Sewer Capacity Availability Request (SCAR) Los Angeles Department of Public Works, April 25, 2011.

City of Los Angeles, Department of Recreation and Parks, Written correspondence from Michael A. Shull, Superintendant, April 15, 2011.

City of Los Angeles, Department of Recreation and Parks, *A Message from the General Manager* http://www.ci.la.ca.us/RAP/dept.htm, accessed April 4, 2011.

City of Los Angeles, Department of Water and Power, *2010 Urban Water Management Plan for the Los Angeles,* January 14, 2011.

City of Los Angeles Department of Water and Power, Letter correspondence, from Ronald O. Nichols, General Manager, dated March 23, 2011; as included in the Water Supply Study, by SEC Civil Engineers, dated June 3, 2011.

City of Los Angeles Department of Water and Power, *Securing L.A.'s Water Supply*, Mayor Antonio R. Villaraigosa and the City of Los Angeles Department of Water and Power, May 2008.

City of Los Angeles Department of Water and Power, Written correspondence from Mike Downs, Western District Engineer, dated June 1, 2011.

City of Los Angeles, *General Plan Conservation Element, Section 3,* Adopted September 2001.

City of Los Angeles, *General Plan Framework*, Re-adopted by the City Council on August 8, 2001.

City of Los Angeles, *General Plan Safety Element*, *Exhibit A and B,* Adopted by the City Council, November 26, 1996.

City of Los Angeles, *General Plan, Noise Element,* Adopted February 3, 1999.

City of Los Angeles, *General Plan, Public Recreation Plan*, a portion of the Service Systems Element. Approved October 9, 1980.

City of Los Angeles, *West Los Angeles Community Plan*, July, 1999.

City of Los Angeles, *West Los Angeles Transportation Improvement and Mitigation Specific Plan*, Adopted March 8, 1997.

City of Los Angeles Municipal Code, Chapter XI, Article I, Section 111.02-(b).

City of Los Angeles, Municipal Code, Article 7, Chapter V, Section 57.01.02.

City of Los Angeles Municipal Code, Ordinance No. 179820, *Green Building Program,* Approved April 22, 2008.

City of Los Angeles, *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming*, May 2007.

City of Los Angeles Stormwater Program, http://www.lastormwater.org/siteorg/program/LID/LALID_HandbookDraft_PartB.pdf, Accessed May 2011.

County of Los Angeles Municipal Permit (NPDES No. CAS004001, Order No 01-182).

Efficient Windows Collaborative, Annual Energy Use by Window Type in Los Angeles California, http://www.efficientwindows.org/city_all.cfm?new=N&prodtype=WN&id=4.

Energy Efficient Rehab Advisor, Low Flow Fixtures, http://rehabadvisor.pathnet.org/ sp.asp?id=9414, July 2004.

Federal Register "Approval and Promulgation of Implementation Plans and Designation of Areas for Air Quality Planning Purposes: California, Final Rule." :26718-26721, May, 2007.

Gabrielino Tongva Indians of California Tribal Council, Telecommunication interview with Robert Dorame, tribal representative, June 14, 2011.

Gleick, Peter.; Haasz, Dana; Henges-Jeck, Christine; Srinivasan, Veena; Cushing, Katherine; and Mann, Amardip. "Waste Not, Want Not: The Potential for Urban Water Conservation in California" Published by the Pacific Institute for Studies in Development, Environment, and Security, November, 2003. http://www.pacinst.org/reports/urban_usage/waste_not_want_not_full_report.pdf Appendices: http://www.pacinst.org/reports/urban_usage/appendices.htm

IPCC Intergovernmental Panel on Climate Change, *Fourth Assessment Report, Summary for Policy Makers,* 2007.

Kiparsky, Michael and Gleick, Peter H.. *Climate Change and California Water Resources: A Survey and Summary of the Literature, California Energy Commission Report 500-04-073*, 2003.

Los Angeles County Department of Public Works, *Hydrology Manual*, January 2006.

Los Angeles Fire Department, Department Overview http://lafd.org/administration/97-lafd-administration/320-department-overview, Accessed April 6, 2011.

Los Angeles Fire Department, *Los Angeles Prop F Fire Facilities Bond*, *Progress Report February – March 2011*. 2011.

Los Angeles Fire Department, Written correspondence from Captain Terrance O'Connell dated April 19, 2011.

Los Angeles Fire Department, Written correspondence from Captain James Patrick Hayden, Dated, June 10, 2011.

Los Angeles Public Library, Library Facilities Division, Written correspondence from Joseph Molles, April 26, 2011.

Los Angeles Public Library, *Summary of Branch Facilities Plan Revision*, http://www.lapl.org/about/planning_overview.html, Accessed April 11, 2011.

Los Angeles Public Library. About the Library, News Room: *Los Angeles Public Library Facts 2010* (for fiscal year 2008-09), http://www.lapl.org/newsroom/2010_facts.html, Accessed April 5, 2011.

Los Angeles Times, "Colorado River Water Deal Overturned", http://articles.latimes.com/2010/jan/15/local/la-me-water15-2010jan15

Los Angeles Unified School District, Office of the Chief Operating Officer, *2010-2011 New and Continuing Multitrack Year-Round Schools*, July 1, 2010. http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/ABOUT_US/INFORMATION/DISTRICT_CALENDARS/2010-2011%20SCHOOL%20TYPE-ALPHA-CAL%20SCHEDULE.PDF, accessed April 1, 2011.

Los Angeles Unified School District, *Fingertip Facts 2010-2011*. http://notebook.lausd.net/pls/ptl/docs/PAGE/CA_LAUSD/LAUSDNET/OFFICES/COMMUNICATIONS/10-11FINGERTIPFACTS_REVISED228.PDF, Accessed April 1, 2011.

Los Angeles Unified School District, Residential Development School Fee Justification Study, September 27, 2010.

McLeod, Ph.D., Samuel A., Natural History Museum of Los Angeles County "Paleontological Records Search for the Proposed SunCal Redevelopment Project, in Century City, Los Angeles County," January 25, 2008.

Metropolitan Water District of Southern California, *Board of Directors Report Agenda Item 8-4,* Meeting of September 11, 2007.

Metropolitan Water District of Southern California, *Integrated Water Resources Plan, Report No. 1373*, http://www.mwdh2o.com/mwdh2o/pages/yourwater/irp/IRP2010Report.pdf. Updated October 12, 2010.

Metropolitan Water District of Southern California, *Regional Urban Water Management Plan*, November 2010. http://www.mwdh2o.com/mwdh2o/pages/yourwater/RUWMP/RUWMP_2010.pdf.

Metropolitan Water District of Southern California, *Water Surplus and Drought Management Plan, Report No. 1150*, August 1999.

Metropolitan Water District of Southern California, *Water Surplus and Drought Management Plan*, Appendix J, June 21, 2007.

Moser, Susan; Franco, Guido; Pittiglio, Sarah; Chou, Wendy; and Cayan Dan. *The Future is Now: An Update on Climate Change Science Impacts and Response Options for California, California Energy Commission Report 500-2008-071,* 2009.

Natural Resources Defense Council, *Settlement Maintains Scientific Protections for Delta Smelt and Bay-Delta Estuary,* February 24, 2011.http://switchboard.nrdc.org/blogs/dobegi/settlement_maintains_scientifi.html. Accessed May 3, 2011.

Southern California Association of Governments (SCAG), *2008 Regional Transportation Plan,* April, 2008.

Southern California Association of Governments (SCAG), 2008 *Regional Comprehensive Plan and Guide*, 2008.

Senate Bill No. 97, Chapter 185, approved by Governor Schwarzenegger and filed with the California Secretary of State, August 24, 2007.

Shared Parking, Second Edition, Urban Land Institute (ULI), 2005.

South Coast Air Quality Management District (SCAQMD), *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions*, 2002.

South Coast Air Quality Management District, *CEQA Air Quality Handbook,* April, 1993.

South Coast Air Quality Management District, *Draft 2007 Air Quality Management Plan*, 2007.

South Coast Air Quality Management District, http://www.aqmd.gov/ceqa/handbook/signthres.doc.

South Coast Air Quality Management District, Historical Data by Year to 1994 2009, http://www.aqmd.gov/smog/historicaldata.htm

South Coast Air Quality Management District, Multiple Air Toxics Exposure Study III Model Estimated Carcinogenic Risk, http://www2.aqmd.gov/webappl/matesiii.

South Coast Air Quality Management District, *Final-Methodology to Calculate Particulate Matter (PM) 2.5 and PM2.5 Significance Thresholds*, October, 2006.

South Coast Air Quality Management District, *Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions,* December, 2002.

South Coast Air Quality Management District, *Final Localized Significance Threshold Methodology* http://www.aqmd.gov/ceqa/handbook/lst/Method_final.pdf, Revised July, 2008.

State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources, Map 117, dated October 17, 2006.

State of California Department of Finance. Table E-5: Population and Housing Estimates for Cities, Counties, and the State, 2010-2011. http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php. Accessed April 29, 2011.

State of California Department of Transportation (Caltrans), *Transportation Related Earthborne Vibrations*, page 4, February, 2002.

State of California Department of Water Resources, *Climate Change Characterization and Analysis in California Water Resources Planning Studies - Final Report*, page v. December, 2010.

State of California Department of Water Resources, C*limate Change Adaptation Strategies for California's Water: Managing an Uncertain Future*, http://www.water.ca.gov/climatechange/docs/ ClimateChangeWhitePaper.pdf, October, 2008.

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

State of California Department of Water Resources, *Progress on Incorporating Climate Change into Management of California's Water Resources*, pages 1-3 to 1-4, July 2006.

State of California Department of Water Resources, *Using Future Climate Projections to Support Water Resources Decision Making in California,* page 2, May, 2009.

State of California Department of Water Resources, Memorandum to All DWR Employees: "Sustainability Targets," September 20, 2010. http://www.water.ca.gov/climatechange/docs/ Sustainability_Policy.pdf.

State of California Department of Water Resources, Memorandum to All DWR Employees: "Sustainability Workgroup," April 22, 2009. http://www.water.ca.gov/climatechange/docs/Sustainability_Policy.pdf

State of California, *CEQA Guidelines*, 2011.

State of California, Office of Planning and Research, *General Plan Guidelines*, 2002.

State of California, Office of Planning and Research, Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009.

State of California, Office of Public School Construction, *An Overview of the State School Facility Programs*, February, 2010.

State of California, Water Resources Control Board, NPDES General Permit for Discharges Associated with Construction Activity (Water Quality Order No. 99-08-DWQ).

Strudwick, I., J. Michalsky, and G. King, 1998. Archaeological Site Record for CA-LAN-2479H. Document on file at California Historical Resources Information System, South Central Coastal Information Center at California State University, Fullerton.

U.S. Census Bureau, 2005-2009 American Community Survey 5-Year Estimates: Census Tract 2679, Los Angeles County, California.

U.S. Code of Federal Regulations (CFR), 36 Section 60.2.

U.S. Code of Federal Regulations (CFR), 14 Part 77.

U.S. Department of the Interior, National Park Service, *National Register Bulletin: How to Apply the National Register Criteria for Evaluation*, Revised 2002.

U.S. Department of Transportation, Federal Aviation Administration, FAA Advisory Circular 70/7460-1K August 1, 2000, updated February 1, 2007.

U.S. Department of Transportation, Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, April 1995.

U.S. Department of Transportation, Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

U.S. District Court for the Eastern District of California, Consolidated Delta Smelt Cases, Case No. 1:09-cv-407 OWW, Stipulation and [Proposed] Order for Interim Remedy through June 30, 2011, filed February 24, 2011.

U.S. Environmental Protection Agency, *2010 U.S. Greenhouse Gas Inventory Report*, 2010.

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