II. EXECUTIVE SUMMARY

PROJECT DESCRIPTION

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

The proposed Project is designed to replace two existing buildings, which no longer meet current standards of operation. The office space contained within the structures is representative of Class B-C buildings[1], and the presence of materials such as asbestos make any renovations short of complete reconstruction prohibitive. The new Project would meet the demand for modern office space in Century City and provides a more efficient use of the property.

PROJECT LOCATION

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

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

[1] For the purposes of comparison, office space is grouped into three classes. These classes represent a subjective quality rating of buildings which indicates the competitive ability of each building to attract similar types of tenants. A combination of factors including rent, building finishes, system standards and efficiency, building amenities, location/accessibility and market perception are used as relative measures. Building amenities include services that are helpful to either office workers or office tenants and whose presence is a convenience within a building or building complex. Examples include food facilities, copying services, express mail collection, physical fitness centers or child care centers. As a rule, amenities are those services provided within a building. The term also includes such issues as the quality of materials used, hardware and finishes, architectural design and detailing and elevator system performance.
Class A: Most prestigious buildings competing for premier office users with rents above average for the area. Buildings have high quality standard finishes, state of the art systems, exceptional accessibility and a definite market presence.
Class B: Buildings competing for a wide range of users with rents in the average range for the area. Building finishes are fair to good for the area and systems are adequate, but the building does not compete with Class A at the same price.
Class C: Buildings competing for tenants requiring functional space at rents below the average for the area.
Source: Building Owners and Managers Association (BOMA), Building Classification Website, www.boma.org/classes.htm, March 7, 2002.

EXISTING DEVELOPMENT

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

Table II-1
Existing Uses on the Subject Property

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

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

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

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

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

PROPOSED DEVELOPMENT

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

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

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

Proposed Office Building

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

Table II-3
Proposed Development

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

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

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

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

Plaza Renovation

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

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

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

Landscape Plan

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

Cultural Facility

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

Parking and Access

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

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

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

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

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

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

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

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

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

Demolition / Construction Process

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

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

PROJECT APPROVAL AND INTENDED USE OF THE EIR

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

City of Los Angeles

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

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

Other

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

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

PROJECT OBJECTIVES

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

- Create a mixed-use commercial center, consistent with the purposes and intent of the Century City North Specific Plan, and the General Plan Framework.
- Preserve the high quality architectural character of Century City through the design of a Project that aesthetically and stylistically complements and enhances the contemporary feel of the area, including the development of appropriately scaled buildings, architectural detailing and landscape improvements.
- Revitalize the ABC Entertainment Center site, one of the older, under-utilized developments in Century City, by providing an economically productive and vibrant use of the property that benefits the community, reduces vacant properties, and stimulates the local economy.
- Provide an energy efficient and environmentally conscious development through such means as the use of recycled or otherwise energy efficient materials, state-of-the-art technologies, water saving devices and design elements that would save energy.

- Provide sufficient parking, to ensure that the parking needs of the Project's employees and visitors are met.
- Reduce vehicle trips, and the associated traffic, noise and air quality environmental impacts from those trips, by providing suitable pedestrian access to and from the site, to encourage Project occupants to shop and dine in the local area.
- Provide additional Class "A" office space, which both encourages and facilitates opportunities for businesses to locate in Century City, a designated Regional Center in the Los Angeles Framework Element of the City General Plan.
- Provide a Project that incorporates a pedestrian-oriented plaza, benches, shade, and attractive landscaping.
- Design a Project that is consistent with the predominant character and scale of Century City and the capacity of the local street system.
- Provide a cultural facility intended to house exhibition areas for one or more major cultural institutions, creating a cultural opportunity for both tenants of surrounding offices, as well as nearby residents and visitors.
- Provide sufficiently sized floor plates to meet the needs of current industry demands.
- Create attractive new dining opportunities, providing Century City with new choices for lunch or dinner at a range of price levels.

AREAS OF CONTROVERSY KNOWN TO LEAD AGENCY

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

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

ENVIRONMENTAL IMPACT ANALYSIS SUMMARY

AESTHETICS

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

1. Visual Qualities

Project Impacts

Aesthetic Character

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

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

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

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

Alteration of Views

Based on the visual analysis prepared for the Project, the increased height of the proposed building compared to the existing structures would increase the visibility of the Project site**.** However, due to the concentration of off-site view-blocking structures, increased visibility is predominantly limited to street corridors that are variously oriented and "channeled" toward the Project. Views of the proposed building may be intermittently available from elevated windows through visual gaps between the taller buildings that surround the site.

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

Mitigation Measures

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

AE-1 All open areas not used for buildings, driveways, parking areas, or walkways shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the Los Angeles Department of City Planning.

AE-2 The owners shall maintain the Project site to be clean and free of debris and rubbish and promptly remove any graffiti from walls, pursuant to Municipal Code Sections 91.810F, 91.8904.1, and 91.1707-E.

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

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

2. Lighting and Glare

Project Impacts

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

Mitigation Measures

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

Lighting

AE-3 Exterior lighting shall be designed to shield and direct illumination to the Project site, and/or areas which do not include light-sensitive uses.

AE-4 The Project shall not install flashing, moving, strobe, or blinking outdoor lights along the western and southern boundaries of the Project site or on the south-facing exterior wall of the proposed building.

AE-5 Landscape plans shall utilize large canopy trees particularly along the southern perimeter of the Project site to the extent feasible.

Glare

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

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

3. Shading

Project Impacts

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

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

Mitigation Measures

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

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

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

AIR QUALITY

1. Emissions

Project Impacts

Construction Air Pollutant Emissions

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

The existing office space, retail uses, theater, cinema and health club would continue to generate emissions on the Project site without the Project. The net changes in pollutants generated by the demolition and construction of the Project are determined by subtracting the emissions that would be generated with the existing land uses from the modeled demolition-related emissions. The Project results in a net reduction in emissions during demolition for all pollutants with the exception of PM_{10}. The projected net increase in PM_{10} emissions during demolition is 22.3 pounds per day. This is below the SCAQMD significance threshold of 150 pounds per day. This phase of construction would generate the highest emission levels, and emissions from all other phases of construction would be below the thresholds. Therefore, the Project does not result in a significant short-term air quality impact.

Operational Phase Impacts

Regional Air Quality

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

Local Air Quality

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

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

Mitigation Measures

Construction Phase Mitigation

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

AQ-1 The Project shall comply with the requirements of SCAQMD Rule 403, Fugitive Dust, which requires the implementation of Reasonably Available Control Measures (RACM) for all fugitive dust sources, and the Air Quality Management Plan (AQMP), which identifies Best Available Control Measures (BACM) and Best Available Control Technologies (BACT) for area sources and point sources, respectively.

AQ-2 All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.

AQ-3 The applicant or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.

AQ-4 All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

AQ-5 All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

AQ-6 All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.

AQ-7 General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

AQ-8 The Project applicant shall be required to coordinate with a representative of the Santa Monica Transit Parkway Project regarding construction-related activities.

Operational Phase Mitigation

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

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

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

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

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

Further, it is noted that construction air quality emissions vary considerably from day to day, and the worst-day emissions are assumed for purposes of this analysis. In addition, each of the related projects has been required to mitigate their impacts to the maximum extent feasible. Thus it is likely that actual air emissions will be less than predicted. In any case, the proposed Project's contribution is substantially less than significant (the 22.3 lbs. per day projected Project construction emissions of PM_{10} are only 15% of the SCAQMD threshold of 150 lbs. per day, all other emissions are reduced). However, the Santa Monica Transit Parkway Project is currently scheduled to be under construction at the same time as the proposed Project. Such scheduling, coupled with other projects which could commence construction during this time could result in a potentially significant cumulative air quality impact due to construction emissions.

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

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

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

2. Wind

Project Impacts

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

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

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

Mitigation Measures

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

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

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

BIOLOGICAL RESOURCES

Project Impacts

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

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

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

Mitigation Measures

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

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

CULTURAL RESOURCES

Project Impacts

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

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

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

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

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

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

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

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

Mitigation Measures

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

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

GEOLOGY

Project Impacts

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

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

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

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

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

Mitigation Measures

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

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

HAZARDOUS MATERIALS

Project Impacts

Hazardous Materials

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

Asbestos Containing Materials

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

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

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

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

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

Methane

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

Mitigation Measures

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

HHM-1 Prior to issuance of the demolition permit, the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant stating that all asbestos containing materials (ACM) present in the building has been abated in compliance with South Coast Air Quality Management District's Rule 1403 as well as all other applicable local, state, and federal rules and regulations.

HHM-2 Hazardous materials generated, as a result of routine maintenance of equipment shall be disposed of in accordance with legal disposal procedures.

HHM-3 All contractors and construction companies shall be advised of the potential risk associated with subsurface methane in soil gas below the Project site by the applicant. Although soil gas monitoring did not indicate that hydrogen sulfide is a potential problem at the Project, this gas can be associated with methane gas and should be monitored during construction operations as a potential health threat and an odor concern.

HHM-4 The contractors and construction companies shall develop a Health and Safety Plan that addresses combustible gas and hydrogen sulfide concerns and procedures they intend to institute to minimize potential danger from explosion or exposure in the event elevated concentrations are encountered. The Plan shall comply with all applicable environmental health and safety laws and indicate, at minimum, the following:

- Precautions that will be taken to arrest any spark generation or ignition sources during construction procedures that penetrate the concrete floor.
- Monitoring equipment and specifications should be included for continuous monitoring of methane concentrations and comparison to levels of concern such as Permissible Exposure Levels (PELs), Threshold Limit Values (TLVs), or concentrations Immediately Dangerous to Life and Health (IDLH) in the breathing zone. In addition, methane concentrations should be regularly monitored and compared against the Lower Explosive Level (LEL). Contingency responses should be established for each scenario.
- Specifications should be included for use of the garage ventilation system, and any additional systems, to assure maximum air exchanges, as necessary, within the facility during construction operations.

HHM-5 The cracks in the floor and seams that open below the concrete floor shall be sealed that open below the concrete floor shall be sealed if deemed necessary by the Department of Building and Safety to minimize gas migration into the garage.

HHM-6 The operation of the ventilation system shall be modified, if necessary, to avoid the development of negative pressures within the building during power outages.

HHM-7 Floor sections on Level F around new pilings shall be sealed at the completion of construction to prevent gas migration into the garage from the sub-surface.

HHM-8 All cross connections between the Level F sub-drain piping and other systems (i.e. the storm drain and ventilation systems) shall be identified and eliminated.

HHM-9 Prior to issuance of a building permit, the building shall be independently analyzed by a qualified engineer, as defined in Section 91.7102 of the Municipal Code, hired by the building owner. The engineer shall investigate and recommend mitigation measures which will prevent or retard potential methane gas seepage into the building. The owner shall implement the engineer's design recommendations subject to Department of Building and Safety and Fire Department approval.

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

HYDROLOGY

Surface Water Runoff

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

Water Quality

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

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

Mitigation Measures

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

H-1 The Project shall comply with the requirements of the NPDES permit for stormwater discharge and with guidelines and policies of the Regional Water Quality Control Board, EPA and local agencies regarding water quality.

H-2 The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.

H-3 Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

H-4 Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.

H-5 Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.

H-6 Reduce and recycle waste, including oil and grease, to the extent feasible.

H-7 Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.

H-8 All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING – DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.

H-9 The legibility of signs and stencils discouraging illegal dumping must be maintained.

H-10 Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.

H-11 Storage areas must be paved and sufficiently impervious to contain leaks and spills.

H-12 Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.

H-13 The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

H-14 Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the

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

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

LAND USE

Project Impacts

Consistency with Land Use Patterns

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

Compatibility with Adjacent Uses

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

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

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

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

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

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

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

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

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

Mitigation Measures

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

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

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

NOISE

Project Impacts

Construction Phase Impacts

Off-Site Impacts

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

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

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

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

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

Construction Vehicle Impacts

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

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

Operational Impacts to Off-Site Uses

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

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

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

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

Operational Impacts to On-Site Uses

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

Mitigation Measures

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

N-1 All exterior construction and demolition activities located within 500 feet of a residence or hotel shall occur between 7:00 am and 6:00 p.m. Monday through Friday and 8:00 a.m. to 6:00 p.m. on Saturday, pursuant to the City of Los Angeles Municipal Code Section 41.40.

N-2 Construction equipment shall use noise control devices, such as equipment mufflers, enclosures, and barriers. Natural and artificial barriers such as ground elevation changes and existing buildings can shield construction noise. Construction operations shall be staged as far from sensitive uses as feasible.

N-3 Maintain all sound reducing devices and restrictions throughout the construction period.

N-4 Locate any delivery, truck loading or trash pickup areas as far from noise sensitive land uses as possible to the extent feasible.

N-5 The project shall comply with the City of Los Angeles Municipal Code Chapter XI, which prohibits the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

N-6 The project sponsor must comply with the Noise Insulation Standards of Title 24 of the California Code Regulations, which insure an acceptable interior noise environment.

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

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

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

POPULATION AND HOUSING

Project Impacts

Population Growth

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

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

Consistency with Population Growth and Housing Policy

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

Mitigation Measures

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

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

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

PUBLIC SERVICES

1. Fire Protection

Project Impacts

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

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

Mitigation Measures

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

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

FP-1 Project building plans shall include the submittal of a plot plan for approval by the Fire Department either prior to the recordation of the final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; and all structures must be within 300 feet of an approved fire hydrant.

FP-2 The applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features appropriate to the design of the Project.

FP-3 Construction of new public or private roadway in the proposed development shall not exceed 15 percent in grade, unless otherwise approved.

FP-4 The Project shall utilize standard cut-corners on all turns, if applicable.

FP-5 Fire Department access shall remain clear and unobstructed during demolition.

FP-6 If applicable, fire lanes and dead ending streets shall terminate in a cul-de-sac or other approved turning area.

FP-7 No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.

FP-8 If applicable, where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface on the roadway.

FP-9 No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway, of an improved street, access road, or designated fire lane, unless otherwise approved.

FP-10 Where access for a given development requires accommodation of Fire Department apparatus, overhead clearance shall not be less than 14 feet.

FP-11 Where fire apparatus will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot unless otherwise approved.

FP-12 The Project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles.

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

2. Police Protection

Project Impacts

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

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

Mitigation Measures

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

PS-1 The applicant shall consult with the Los Angeles Police Department Crime Prevention Unit on crime prevention features appropriate to the design of the Project.

PS-2 Entryways, elevators, lobbies, and parking areas shall be well illuminated and designed with a minimum of visual dead space to eliminate areas of concealment.

PS-3 Upon completion of the Project, the owner shall provide the West Los Angeles Area Commanding Officer with a diagram of each portion of the property, including access routes and additional information that might facilitate police response.

Significant Impacts After Mitigation

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

Cumulative Impacts

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

3. Schools

Project Impacts

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

Mitigation Measures

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

Significant Project Impacts after Mitigation

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

Cumulative Impacts

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

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

4. Libraries

Project Impacts

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

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

Mitigation Measures

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

Significant Project Impacts after Mitigation

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

Cumulative Impacts

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

RECREATION AND PARKS

Project Impacts

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

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

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

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

Mitigation Measures

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

Significant Project Impacts After Mitigation

The proposed Project would not result in significant unavoidable impacts.

Cumulative Impacts

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

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

TRANSPORTATION/ TRAFFIC

Project Impacts

Project Traffic Generation

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

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

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

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

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

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

Analysis of Future Traffic Conditions (With and Without Project)

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

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

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

Regional Traffic Impacts

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

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

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

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

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

Construction Impacts

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

Parking and Pedestrian Access

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

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

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

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

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

Mitigation Measures

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

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

T-2 A Project construction traffic control plan will be developed, to the satisfaction of LADOT, including a designated haul route and staging area, traffic control procedures, emergency access provisions, and construction crew parking to mitigate the traffic impact during construction.

T-3 Construction employees commuting to the Project site shall not be allowed to park on public streets.

Significant Project Impacts After Mitigation

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

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

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

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

Cumulative Impacts

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

UTILITIES AND SERVICE SYSTEM

1. Wastewater

Project Impact

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

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

[3] City of Los Angeles Bureau of Sanitation Wastewater Engineering Services Division, letter dated April 26, 2002.
[4] City of Los Angeles Bureau of Sanitation, letter dated April 26, 2002, and phone conversation with Mr. Nelson Sarti, Bureau of Sanitation, May 13, 2002.

Mitigation Measures

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

Significant Project Impacts After Mitigation

The proposed Project would not generate significant wastewater impacts.

Cumulative Impact

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

2. Stormwater

Project Impacts

Construction Impacts

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

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

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

Operational Impacts

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

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

Mitigation Measures

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

U-1 The Project shall comply with NPDES requirements of the existing stormwater drain permit along with the preparation of a stormwater plan and other applicable filings prior to construction.

U-2 During construction, drainage of the Project site shall be disposed of in a manner satisfactory to the City Engineer and the Regional Water Quality Control Board.

U-3 The Project shall implement stormwater Best Management Practices (BMPs) to retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development of Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required. The applicant will be required to implement stormwater BMPs to filter the runoff from storm events.

U-4 Project connection to the sanitary sewer must have authorization from the Bureau of Sanitation.

U-5 Cleaning of oily vents and equipment shall be performed within designated covered area, sloped for wash water collection, and with a pretreatment facility for wash water before discharging to properly connected sanitary sewer with a CPI type oil/water separator. The separator unit must be: designed to handle the quantity of flows; removed for cleaning on a regular basis to remove any solids; and the oil absorbent pads must be replaced regularly according to manufacturer's specifications.

U-6 Trash dumpsters must be stored either under cover and with drains routed to the sanitary sewer or use non-leaking and watertight dumpsters with lids. Containers shall be washed in an area with a properly connected sanitary sewer.

U-7 Reduce and recycle waste, including oil and grease, to the extent feasible.

U-8 Liquid storage tanks (drums and dumpsters) shall be stored in designated paved areas with impervious surfaces in order to contain leaks and spills. Install a secondary containment system such as berms, curbs, or dikes. Drip pans or absorbent materials shall be used whenever grease containers are emptied.

U-9 All storm drain inlets and catch basins within the Project area must be stenciled with prohibitive language (such as "NO DUMPING – DRAINS TO OCEAN") and/or graphical icons to discourage illegal dumping.

U-10 The legibility of signs and stencils discouraging illegal dumping must be maintained.

U-11 Materials with the potential to contaminate stormwater must be: 1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar stormwater conveyance system; or 2) protected by secondary containment structures such as berms, dikes, or curbs.

U-12 Storage areas must be paved and sufficiently impervious to contain leaks and spills.

U-13 Storage areas must have a roof or awning to minimize collection of stormwater within the secondary containment area.

U-14 The owner(s) of the property shall prepare and execute a covenant and agreement (Department of City Planning General form (CP-6770)) satisfactory to the Department of City Planning binding the owners to post-construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and/or per manufacturer's instructions.

U-15 Prescriptive methods detailing BMPs specific to the "Restaurant" category shall be incorporated to the extent feasible. Prescriptive methods can be obtained from the Planning Department's public counter or from the City's website at www.lastormwater.org.

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

3. Water Supply

Project Impacts

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

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

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

Mitigation Measures

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

U-16 The proposed Project shall use automatic sprinkler systems for landscape irrigation, which are adjusted on a seasonal basis to operate during hours where water loss due to evaporation would be minimized.

U-17 Where feasible, reclaimed water shall be used to irrigate landscaped areas.

U-18 The proposed Project shall comply with all sections of the City of Los Angeles' Water Conservation Ordinance (Ordinance No. 166,080) and Xeriscape Ordinance, as applicable.

U-19 The proposed Project shall use lower-volume water faucets and water saving showerheads in all construction.

U-20 The proposed Project shall use plumbing fixtures that reduce potential water loss from leakage due to excessive wear of washers.

U-21 The proposed Project shall incorporate water conservation measures as appropriate and required by the City of Los Angeles Department of Building Ordinances (No. 163,532, No. 164,093, and No. 165,004) and subsequent amendments, which include the installation of low-flow water fixtures and xeriscape.

Significant Project Impacts After Mitigation

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

Cumulative Impact

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

4. Solid Waste

Project Impacts

Construction Impacts

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

Operational Impacts

Based on generation rates provided by the Los Angeles Bureau of Sanitation, the operational phase of the existing uses creates approximately 18,820[5] pounds of solid waste per week. The proposed Project would have a net increase of 4,843 pounds per week. The City of Los Angeles screening threshold for analysis of potentially significant impacts for solid waste generation is five tons (10,000 pounds) per week. The proposed Project's net generation would fall below this threshold and well below the actual threshold of significance. No significant impact is expected to occur. Impacts would be further reduced through implementation of the proposed mitigation measures.

Because we do not know the collector or the receiving landfill, it is premature to perform an analysis of specific landfill capacity. Landfills with the potential for receiving solid waste from the proposed Project include: Bradley West, Sunshine Canyon, Scholl Canyon, and Calabasas. As shown in Section V.N.4, substantial capacity exists at these landfills. In addition, applications are made periodically for the expansion of existing landfills and the creation of new ones. The Bureau of Engineering continually plans[6] for solid waste disposal, to assure that the disposal needs and recycling requirements of City development can be met.

Mitigation Measures

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

U-22 The Project applicant shall salvage and recycle construction and demolition materials to the maximum extent feasible. Documentation of a recycling program will be provided to the City of Los Angeles Department of Public Works.

U-23 The Project applicant shall institute an on-site recycling/conservation program to reduce the volume of solid waste going to landfills in compliance with the City's goal of a 50% reduction in the amount of waste going to landfills.

Significant Project Impacts After Mitigation

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

Cumulative Impact

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

5. Electricity

Project Impacts

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

[5] Based on solid waste generation prior to implementation of recycling program.
[6] City of Los Angeles Solid Waste Management Policy Plan.

Mitigation Measures

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

U-24 The proposed Project shall comply with the energy requirements set forth in Title 24 of the California Code of Regulations.

U-25 The Project applicant shall consult with the LADWP regarding the implementation of energy conservation measures including:

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

Significant Project Impacts After Mitigation

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

Cumulative Impacts

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

ALTERNATIVES

The criteria for defining project alternatives is the potential to attain most of the basic objectives of the Project while reducing or eliminating significant impacts compared to the proposed Project. The impact analysis, as detailed in Section V of this EIR, concluded that the proposed Project generated no impacts

that would remain significant after mitigation, except for potentially significant construction air quality and noie impacts.

Four alternatives, including the "No Project Alternative," were evaluated. The proposed Project site is 14.02 acres in size and includes the Century Plaza Towers. However, the Project does not propose to modify any areas outside of the 9.2 acre portion to be redeveloped. Accordingly, all alternatives are assumed to fit within the 9.2 acre portion of the Project site to be redeveloped. For clarity, the rest of this analysis lists only the floor areas of the area to be redeveloped and does not include any square footage from the Century Plaza Towers.

1. No Project Alternative. This alternative assumes that no changes to the site occur. The existing structures would remain, and their current condition would be unchanged. Analysis of this alternative will also include an assessment of the impact of the site fully occupied, but otherwise unchanged. This alternative considers impacts associated with the existing 287,701 sq. ft.[7] of office space; 57,316 sq. ft of commercial retail space; a 39,695 sq. ft. (1,751 seats) movie theater; a 108,786 sq. ft. (2,250 seats) live theater; 144,390 sq. ft. of restaurant areas; paved plaza; and subterranean parking structure. Total floor space within the area to be redeveloped would be 678,822 sq. ft. The site as a whole, including the Century Plaza Towers would contain a total floor area of 3,067,338 sq. ft. on a site totaling 610,834 sq. ft. (14.023 acres). This results in an FAR of 5:1. This alternative satisfies a direct requirement in CEQA for a No Project Alternative comparison.

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

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

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

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

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

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

As required by the California Environmental Quality Act (CEQA), an environmentally superior alternative must be identified. In this case, the Reduced Density Alternative would satisfy this requirement. As summarized in **Table VI-2**, the Reduced Density Alternative results in reduced impacts to: aesthetics; air quality; geology; noise; population and housing; public services; recreation; transportation; and utilities and service systems.