II. EXECUTIVE SUMMARY

A. PROJECT DESCRIPTION

Project Location and Overview

Casden Glendon, LLC. (the "Applicant"), is requesting approval for Palazzo Westwood, a 528,490-square foot mixed-use Project in Westwood Village, on the southwest corner of Weyburn and Tiverton Avenues on a 185,119.2-square foot, 4.25-acre site. The site is zoned C4-2D-O. Palazzo Westwood will feature a 350-unit (413,490-square feet) upscale, contemporary residential apartment community and 115,000 square feet of retail space. The retail component will consist of a variety of neighborhood-serving shops and services, including uses such as drug stores, markets, clothing stores, home furnishing stores, repair shops and other similar types of retail establishments.[1] One or more restaurants with outdoor dining may also be featured.[2] Project renderings, as shown on the cover of this document and in **Figures in Section III., Project Description of this EIR**, depict the proposed development.

Palazzo Westwood will be constructed on privately owned, primarily vacant lots. The majority of the east side of the property is currently used for at-grade public parking and the majority of the west side is vacant. The site will also encompass the space currently occupied by the Glendon Manor apartment building on the east side of Glendon Avenue and the remainder of the block north of the Moustache Café on the west side of Glendon Avenue, including the existing Mann Plaza motion picture theater (the theater will not be retained as part of the Project). Prior to or during construction, the Applicant will record a Lot Tie Agreement to join all the lots on the site.

Project Architecture

Palazzo Westwood has been designed to complement the architectural character of Westwood Village. The development plan is intended to meet the overall aesthetic and architectural goals of the Westwood Village Specific Plan (the "Specific Plan"). Spanish Colonial Revival architecture with substantial architectural detail will be featured throughout the Project. In compliance with the Specific Plan, there will also be architectural elements such as, a varied roofline, façade variations and balconies that enhance the Project's Spanish Colonial style.

The development consists of 528,490 square feet, of which 460,050 square feet is net new development. The Project has an overall density of 2.85 to 1 Floor Area Ratio ("FAR"). **Table II-1**, below identifies existing, proposed, and net new development floor space.

The Applicant has recently[3] removed several vacant commercial structures located on the west side of Glendon Avenue, just south of Weyburn Avenue. Currently, the 652-seat Mann Plaza movie theater located at 1067 Glendon Avenue is in use, while the Glendon Manor apartment building at 1070 Glendon Avenue is vacant. Both structures will be removed as part of the Project.

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[1] The analysis in this document assumes that a supermarket, which has greater impacts than other shopping center uses, will be included as part of the project. Thus, this analysis does not underestimate Project impacts. The Alternatives Section includes analysis of several shopping center alternatives without a supermarket.

[2] Note that if one or more of these may include outdoor dining in the public right-of-way on the sidewalk, future tenants will be required to obtain additional approval. All restaurants, if any, will front on Glendon Avenue; thus Project outdoor dining could occur only on Glendon Avenue.

[3] Summer of 2002.

While variations from the Specific Plan are proposed, most are required because a hotel use was previously approved for this site, and the Specific Plan provisions for this site were amended specifically to permit that hotel development. The Applicant is now proposing a mixed use project, which requires variations from several of the Specific Plan's hotel-based provisions. Overall, the Project is designed to preserve the integrity and spirit of the Specific Plan. (See Intended Uses of the EIR, below, which lists amendments and other entitlement requirements.)

Table II-1
Existing-Built and Proposed Project Land Uses

Land Use	Existing-Built (sq. ft.)	Proposed Project (sq. ft.)	Net New Development (sq. ft.)
Retail/Restaurants	29,400 (1)	115,000 (2)	85,600 (2)
Movie Theater	12,000	0	-12,000
Residential Apartments	27,040	413,490	386,450
Total Bldg. Floor Area	**68,440**	**528,490**	**460,050**

(1) Area calculation based upon actual square footage of the commercial structure demolished summer of 2002 (Demolition Permit No. 02019-10000-00761). Since the building was occupiable at the time of the NOP, credit is given for this square footage. The Traffic analysis (and Air Quality and Noise calculations based upon traffic impacts) utilize a lower square footage of 24,400, because this is the amount of credit for existing uses that has been granted to the site by the Los Angeles Department of Transportation (LADOT). Since the Traffic, Air and Noise analysis takes less credit for existing uses, and the "net new" development calculation is higher, these sections conservatively estimate greater impacts than they would using the actual square footage shown in this Table.

(2) May include a Supermarket up to 54,000 square feet in size; if a Supermarket is included, restaurants at up to 9,150 sq. ft. may be included. If a Supermarket is not included, restaurants at up to a total of 15, 000 sq. feet may be included. In either case, restaurants, will only be located where they front on Glendon Avenue. The EIR analyzes the most intensive uses for each analysis issue, in order to not underestimate impacts.

The Proposed Project is situated on three parcels - Parcels "A" (2.724 acres) and "C" (0.292 acres) on the east side of Glendon Avenue, and Parcel "B" (1.234 acres) on the west side of Glendon Avenue totaling 4.25 acres.[4] The overall site has a 19-foot grade differential between the most northern portion of the properties at Weyburn Avenue and the most southern portion of the property.

Height

The Proposed Project buildings (including roofs, roof structures and parapet walls) will be no higher than 65 feet from the highest point of the roof to the elevation of the ground surface below that point of measurement. The building excluding roof and roof structures shall be no more than 55 feet as measured from the top of the habitable space to the ground surface below that point of measurement. As permitted in the Specific Plan, unoccupied towers would be permitted to 40 feet above the building/roof height at corners and 20 feet above the building/roof height elsewhere.

[4] For ease of description in the EIR analysis, these three portions are described as Parcels A, B and C. The project site actually consists of multiple lots and will be subject to a Parcel Map, as shown above, in Figure III-3b. The total site acreage is 4.249, which is rounded to 4.25 acres.

The highest point of the building relative to the ground surface below is 70 feet; this height occurs at an unoccupied tower. Because of the significant slope of the Project site (up to 19 feet at some points), the highest point of the building relative to grade (the lowest point of the site) is 82 feet.

Proposed Distribution of Project Land Uses

The Project will rise five stories above street level, and extend three parking levels below ground. Retail uses will occupy the street level[5], with the apartments and apartment amenities situated above. A full set of Project floor plans is reproduced in Section III., Project Description. Project Cross Sections are also provided to demonstrate the layering and structure of the entire Project as well as the spatial relationship between Project components. The Project land use components are described below.

Retail Component

Palazzo Westwood includes 115,000 square feet of ground floor retail located directly below four levels of dwelling units. The ground floor retail area is currently designed as an open floor plate to provide flexibility to future retail users. Approximately 71,000 square feet of retail space will be located on Parcels A and C, which may accommodate two large retailers, such as a drug store and a market. Parcel B will have 44,000 square feet of retail space and may accommodate a series of smaller retail establishments and restaurants, one or more of which may feature an outdoor dining area to be located within the courtyard and on portions of the 17-foot wide sidewalk. Tenant requirements and needs will determine the final layout of the retail space.

The exterior design of the retail and residential uses are fully integrated and designed as a unified development. The retail street frontages will feature window displays for each retail space, except on Tiverton Avenue where retail display, windows, signs and commercial vehicular ingress and egress are not permitted.

As noted, the property has a 19-foot grade differential between the most northern portion of property at Weyburn Avenue and the most southern portion of the property. This difference in grade causes portions of the retail floor plate to be below grade. The lowest single point will be 8 feet below grade. The overall height of the retail space will be between 15 and 16 feet, rendering the retail space substantially above grade. This grade differential will allow for handicapped access (in accordance with the American Disabilities Act) without the need for ramps. Commercial loading for the retail uses will be located in the alley west of the site, on Parcel B, and on the southern edge of Parcel C.

Residential Component

Four levels of residential development are located above the entry grade, starting with the Podium Level, which is one story above ground, over the retail uses), and including the Second Floor through Fifth Floor levels. On the Podium Level, the open areas to serve the residents will be designed with landscaped and hardscaped areas to provide for passive recreation and garden views from the apartment units. The residential lobby, management office and private clubhouse are located at the corner of Tiverton and Weyburn Avenues on the Street Level. General public access to the residential units will be restricted, as described under Project Access and Parking, below. Several apartment designs will be provided, ranging in size from 750 square-foot one-

[5] Because of the grade differential, the retail establishments on Parcel A will be situated slightly below street level, with the ceilings extending to the top of the ground floor level. For EIR analysis, this level will be described as the ground level, along with the remaining retail uses.

bedroom flats to 2,000 square foot two-story townhouses. Private amenities for the residents will also be provided, including a health club, clubhouse and a series of themed gardens. These areas are designed to avoid impacts on the adjoining residential neighbors on Tiverton Avenue. The proposed residential unit floor plans are shown in **Figures located in Section III., Project Description**, of this EIR.

Project Access and Parking

Palazzo Westwood will encourage pedestrian use along Glendon Avenue by incorporating 17-foot sidewalks on each side of the street. The sidewalks will feature colored concrete textured paving, new street trees and improved crosswalks, and may be utilized for outdoor dining patios.[6] The Applicant proposes to narrow the pavement width of Glendon Avenue adjacent to the development from 42 feet to 36 feet, and eliminate street parking (which will be replaced within the Project's parking structure) to accommodate the proposed wider sidewalks. This will further the pedestrian-oriented character of the Village. Additionally, the street improvements will eliminate on-street parking and will provide a left-turn pocket, thereby reducing traffic impacts. The full right-of-way of Glendon Avenue will remain 70 feet. Landscaping and a new streetscape will also be included to provide a visually pleasing environment that blends with and enhances the community.

The Project will provide 1,452 automobile parking spaces and 73 bicycle parking spaces, as shown in **Table II-2**, and detailed further in Section V.F., Land Use, of this EIR. All retail parking access to the Project will occur on Glendon Avenue approximately 180 feet south of the intersection of Glendon and Weyburn. Residential parking access is located on Tiverton Avenue, 120 feet south of the intersection of Tiverton and Weyburn Avenues. All residential parking access to the Project will occur on Glendon Avenue. The residential parking area will be completely separated from the retail parking area. Access points will be separate and vehicles will not be able to pass from one area to another without re-entering.

Loading is designed to occur at three locations. Retail loading for the western portion of the site will be provided along the alley west of Glendon. Loading for the retail facilities along the east side of Glendon will be provided at the site's southern boundary. Residential loading will occur along Tiverton at the Project's southern boundary.

Project Landcaping

As noted, the Project will include landscaping at street level to enhance the appearance of the structure and to soften the Project's overall look at street level. Additionally, the Project will provide themed gardens within the residential Podium Level of the development. Landscape plans for the Project are shown in **Figures in Section III., Project Description**, of this EIR.

Project Construction

Construction of the Project will require demolition of the two existing structures on the site (the Mann's Theater and the Glendon Manor Apartments), excavation of earth under the entire site and erection of the Project structures. An estimated 9,500 cubic yards of demolition debris will be removed from the site. Removal of this material is expected to take 30 working days (one and a half calendar months). Additionally, an estimated 330,000 cubic yards of earth will be excavated for the three-level subterranean garage, which will underlie the entire site, including the area underneath Glendon Avenue. Excavation and removal of the earth will take seven to eight months.

[6] As noted above, sidewalk patio dining would require subsequent approvals to be obtained by future tenants.

The Project will then be constructed from the lowest level of the subterranean parking structure upwards. As soon as possible, when construction reaches grade level, Glendon Avenue will be re-constructed. Completion of the three subsurface parking levels will take approximately 24 months. As a result of this process, Glendon Avenue will be closed during that period. In addition, intermittent short-term closures will occur during the next 12 months to allow for the delivery and loading of materials as construction of Project buildings occurs. Thus, access on Glendon Avenue will be impacted to some degree for a total 36-month period. The entire Project, including the reconstructed roadway, will be constructed to the satisfaction of all City of Los Angeles Departments including the Department of City Planning, LADOT, the Department of Building and Safety and the Bureau of Engineering.

Table II-2
Proposed Project Parking

Type of Parking	Number of Spaces
Residential Parking	702
Commercial Parking	550
Public Replacement Parking	215 [a]
Subtotal Required Automobile Parking	1467
Reduction for Providing Bicycle Parking	(15) [b]
Total Proposed Automobile Parking	**1,452** [c], [d]
Residential Bicycle Parking	35.10
Commercial Bicycle Parking	27.50
Public / Replacement Bicycle Parking	11.75
Bicycle Parking Calculation	**73.35** [a]
Total Proposed Bicycle Parking	**73** [a]

[a] Fractional space: When the application of these regulations results in the requirement of a fractional automobile parking space, any fraction up to and including one-half may be disregarded and any fraction over one-half shall be construed as requiring one automobile parking space. Parking space calculations here follow the same rule.

[b] Commercial and Industrial Buildings: In the case of buildings where bicycle parking spaces are required by Subdivision 16 of this subsection, the minimum number of required automobile parking spaces may be reduced by the same number as the number of bicycle spaces required for the building (LAMC 12.21 A 4 (c)).

[c] The proposed parking structure includes tandem parking pursuant to the requirements provisions of the Los Angeles Municipal Code. The Proposed Project does not include density bonuses for providing additional parking.

[d] Although the Project site includes a building that is eligible for listing as a historic resource in the California Register (see Section V.C., Cultural Resources), it the site does not contain any buildings listed in the Specific Plan as "Locally Significant Historic Resources" (as set forth in Table 1 of the Specific Plan). Therefore, the Specific Plan restriction that subterranean parking shall not be permitted where a designated cultural resource is involved does not apply.

Haul Route

Hauling of earth and debris would be restricted to a haul route approved by the Department of Building and Safety, as outlined in Section 91.7006.74 of the Los Angeles Building Code. Possible haul sites identified for the Project are Lopez Canyon landfill, Terminal Island and Playa Vista. The proposed haul route would direct trucks to travel south on Glendon Avenue to Wilshire Boulevard, turn right to the San Diego Freeway, and then travel either north to Lopez Canyon landfill, or south to either the Terminal Island dump site or the Playa Vista development site. Return trips will follow the same route. No truck staging or travel is planned to occur on the adjacent Weyburn or Tiverton Avenues. The truck staging area would be located on Sepulveda Boulevard north of Constitution Avenue to Montana Avenue.

Staging Area (prior to 7:00 AM)

The truck staging area will be located outside of the Village, on Sepulveda Boulevard north of Constitution Avenue to Montana Avenue. All staged trucks will be called to the site by radio. The trucks proceed south to Wilshire Boulevard to Glendon Avenue. This staging area has been used for haul trucks for the construction of various UCLA Projects. After 9:00 AM, the trucks will proceed directly to Glendon Avenue.

Surrounding Land Uses

The Project site is surrounded primarily by commercial properties on three sides, with residential properties to the northeast and east. Commercial space just north of the site is located in the Westwood Marketplace (former Bullock's/Macy's building, also called the Madison Marquette Project), which houses several large retail establishments. Just to the east of that building is the Westwood Horizons high-rise apartment complex, on the corner of Tiverton and Weyburn Avenues.

West of the Project, across the alley from Glendon Avenue, are commercial uses which front on Westwood Boulevard, including shops, a restaurant and some office space. Commercial uses south of the site, on the west side of Glendon Avenue north of Kinross Avenue, include the Moustache Café, a florist and a brew pub (the Westwood Brewing Company). South of the Project on the east side of Glendon Avenue are commercial uses including a tailor shop, travel agent, the Westwood Center Building at 1100 Glendon Avenue and vacant commercial space where Glendon Avenue curves easterly to intersect with Tiverton Avenue and Lindbrook Drive.

Multi-family residential units are located east of the Project site, on the east side of Tiverton. Hotel uses are located further south on the east side of Tiverton. Additionally, restaurants are located south of the hotel uses and fronting on Lindbrook Drive.

Project Objectives

The Palazzo Westwood development proposal is designed to accomplish the following objectives, as provided by the Project Applicant:

- Create a mixed-use community consistent with the purposes and intent of the Westwood Village Specific Plan, and the General Plan Framework, that includes a pedestrian-oriented, urban infill development with residential housing above ground floor retail uses.
- Allow a broad mix of land uses that include both residential uses and retail businesses that encourages a balanced mix of neighborhood-serving and community-serving retail uses. This will contribute to the concept of Westwood Village as a retail center that primarily serves the surrounding community and secondarily serves the broader regional and tourist market.

- Preserve the high quality architectural character of Westwood Village through the design of a Project that aesthetically and stylistically complements and enhances the Mediterranean feel of Westwood Village, including the use of appropriately scaled buildings, architectural detailing, landscaping and pedestrian streetscape improvements.
- Improve one of the largest under-utilized parcels in Westwood Village, by providing an economically productive and vibrant use of the property that benefits the Westwood community and the local Business Improvement District, reduces vagrancy and crime that might be associated with vacant blighted sites, and revitalizes and invigorates the local economy.
- Reduce vehicle trips that would otherwise be associated with a development of this size (if it were exclusively commercial or residential), and the associated traffic, noise and air quality environmental impacts from those trips, by creating a mixed-use residential community together with a neighborhood serving retail component that serves the residents of the Project and the surrounding community, thereby reducing the need to travel outside the Village for basic goods and services.
- Provide additional parking including the addition of a substantial number of parking spaces to the Westwood Village parking validation system, which will enhance the Village's role as a full-service shopping area.
- Provide additional housing proximate to the Wilshire Boulevard employment center and UCLA to encourage and facilitate opportunities to live and work in the Village especially for UCLA faculty and staff and for employees of businesses operating on the Wilshire corridor, thereby reducing the use of automobiles. Provide residents of the Proposed Project, as well as residents of Westwood, with opportunities to shop and dine in Westwood Village, which will benefit the overall economic and physical revitalization of Westwood Village.
- Provide mixed-use development on the Westside to help correct the jobs/housing imbalance[7].
- Meet the spirit and intent of the Westwood Village Specific Plan including the following purposes:
    - Permit, encourage and facilitate a balanced mix of uses and an environment attractive to a cross-section of the community (in particular, nearby residents, office employees and UCLA students and staff), so that Westwood Village continues to function as a retail center that primarily serves the surrounding community and secondarily serves the broader regional and tourist market;
    - Be compatible with the predominant character and pedestrian scale of the Village and the capacity of the Village street system;
    - Encourage the provision of neighborhood-serving uses, residential uses above the ground floor, and additional public parking through the floor area bonus program of the Specific Plan;
    - Encourage the provision of streetscape improvements and additional public parking directly by developers and through the assessment of all developed properties in the Village;
    - Locate new development strategically in order to attract new uses and users;
    - Permit, encourage and facilitate the provision of basic services and amenities (in particular, short-term daytime parking and pedestrian amenities) that will permit the Village to function as a shopping area;
    - Encourage and facilitate non-automobile access (or reduced automobile access) to the Village by:

[7] According to the new economy and jobs/housing balance in Southern California", SCAG, April 2001 (Available on the SCAG web site), the Project site is in a jobs-rich area.

- Facilitating pedestrian and shuttle access from UCLA, Wilshire Boulevard offices and surrounding residential areas;
- Providing sufficient parking to serve the Village without encouraging excessive automobile trips to the Village; and
- Developing programs to encourage employee car-pooling and the use of public transit.

- Meet the goals of the Westwood Community Plan in the following ways:
  - Purpose - "Improve the function, design and economic vitality of commercial areas."
  - Policy 1-1.3 - "Provide for adequate multi-family residential development."
  - Objective 2-2 - "To promote distinctive commercial districts and pedestrian-oriented areas."
  - Policy 2-2.1 - "Encourage pedestrian-oriented design in designated areas and in new development."
  - Policy 2-2.2 - "Promote mixed-use Projects along designated Mixed Use boulevards and in Westwood Village.

Intended Uses 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 list below, which includes a General Plan Amendment, Specific Plan Amendments, a Specific Plan Exception, Adjustments, a Conditional Use, a Parcel Map, site plan review and adoption of all required findings. All approvals are from the City of Los Angeles, including its component Departments and Agencies. (See Section V.F., Land Use, for a discussion of land use issues.)

1) General Plan Amendment

Pursuant to Section 11.5.6 B of the Los Angeles Municipal Code ("LAMC"), Amendment from the Circulation Element's designation of Tiverton Avenue from a Secondary Highway to a Collector Street.

2) Westwood Village Specific Plan Amendments

Pursuant to LAMC Section 11.5.7 I, amendments from the following sections and figures:

A. Section 3 to include a subsection exempting Projects within the Specific Plan area from the Commercial Corner Ordinance.

B. Section 4 to include the definition of a Mixed Use Project.

C. Section 4 to include the definition of Unified Development.

D. Figure 1 to include portions of the west side of Glendon Avenue into Subarea 2.

E. Section 5.B 13 to include subsection (b) to reduce the required lot area per unit from 800 to 400 and limit the number of residential units to 350 in Subarea 2.

F. Section 5.B 14 to permit commercial uses along Tiverton Avenue in Subarea 2 in conjunction with a mixed use development (subject to limitations).

G. Section 7.B 6 to include subsection (b) to permit Floor Area Ratio averaging in Subarea 2.

H. Section 8.B 1 to change the permitted height on lots over one acre in Subarea 2 to 65 feet (including roofs, roof structures and parapet walls).

I. Section 8.C 1 to allow Unified Developments in Subarea 2 to be 65 feet without a building setback at 40 feet.

J. Section 9.F to reduce the number of required bicycle-parking spaces for the entire Specific Plan from 1 bicycle parking space per five automobile parking spaces to one bicycle parking spaces per twenty automobile parking spaces.

3) Specific Plan Exception

The applicant requests an exception from the following Westwood Village Specific Plan requirement pursuant to 11.5.7 F:

Section 10.E, which requires a 15-foot landscape buffer along the Tiverton frontage. The Project will include a 15-foot landscape buffer, but the Applicant requests an exception while the redesignation of Tiverton from a Secondary Highway to a Collector Street is being processed.

4) Conditional Use

Pursuant to LAMC Section 12.28, Conditional Use approval for the following Code requirement:

LAMC Section 12.24 W 1, which requires a Conditional Use Permit for the sale or dispensing of alcoholic beverages including beer and wine. The Applicant requests conditional use approval to sell a full line of alcoholic beverages at two off-site uses (*i.e.* retail drug store or market) and three on-site uses (*i.e.* restaurants).

5) Adjustments

Pursuant to LAMC Section 12.28, the Applicant requests adjustments to the following Code requirements:

A. LAMC Section 12.16 C 3, which requires residential uses in the C4 zone to utilize the R4 (Section 12.11 C 4) lot area and set back requirements. The Applicant requests a zero front, side and rear yard requirement for the residential portions of the Project.

B. LAMC Section 12.21 G 2, which requires multi-family developments of 6 units or more to provide specified amounts of useable open space for its tenants. Although the Project exceeds the Code requirement to provide 43,175 square feet of open space (the Project will provide a total of 51,400 square feet of open space), the Applicant requests permission to disperse the open space throughout the Project site. Specifically, the Project will contain 9,600 square feet of open space on the west side of Glendon Avenue, (13,825 square feet are required) and 41,800 square feet of open space on the east side of Glendon Avenue (29,350 square feet are required). This request relates to the Applicant's request that the Project be treated as a unified development.

6) Site Plan Review findings required in LAMC Section 16.05 F.

7) Parcel Map (Merger and Resubdivision) for the subsurface vacation of Glendon Avenue pursuant to Ordinance 174471 (March 5, 2002).

B. 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.

Visual Qualities

Project Impacts

Aesthetic Character

The Project's architectural style, scale, and mixed-use and pedestrian orientated character are consistent with Westwood Village and the Project's surrounding properties. The Project would provide structures compatible with the desired aesthetic character and image of Westwood Village, and would eliminate the blighted nature of this portion of Glendon Avenue. The replacement of the recently demolished commercial retail buildings and parking lots with the Proposed Project structures would be a positive, or beneficial, impact to the Village's aesthetic character, and Project implementation would result in a large net gain in compatible development. Although the Project would eliminate the Glendon Manor apartments, which has some historic value, but is not designated a cultural resource in the Westwood Village Specific Plan, the Project does not otherwise have any significant adverse impact on aesthetic character.

Alteration of Views

The Proposed Project was examined from four different angles. Photographs were taken and computerized Project renderings inserted to simulate future views of the Project from northerly, easterly, northwesterly and southerly views. The Project was found to be compatible in style and scale with existing development from all views; however, it would add considerable massing above existing conditions (i.e., a change in scale over existing conditions) and therefore create significant view impacts as seen from the east.

Mitigation Measures

Overall, the Project would result in a less than significant aesthetic character impact; a less than significant alteration of view impact as seen from the north, south and west; and a significant alteration of view impact as seen from the east. Project design features, such as articulated building facades, architectural detailing (e.g., balconies and arched entryways), and Project landscaping will help reduce but not eliminate alteration of view impacts. Mitigation measures have not been proposed as they have already been incorporated into the design of the Project.

Significant Project Impacts After Mitigation

The Proposed Project would result in significant adverse impact with regard to alteration of views from the east, due to the degree of change over current conditions. The impact from other directions would not be significant.

Cumulative Impacts

The Westwood Marketplace (the recent Madison Marquette project in the former Bullocks/Macy's building) adjacent to the site would be visible in some of the same views as the Proposed Project. However, Westwood Marketplace operates substantially within the existing building and will not

generate any changes to aesthetic character or to views; as a result, there is no cumulative view impact contribution from that project. No other related projects are located close enough to the Project site to cumulatively contribute to the Project's overall less than significant 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.

Lighting

Project Impacts

The Proposed Project would completely change the layout of the site and its nighttime appearance. The existing parking lot and associated glaring vehicle lights and poorly directed fluorescent lighting would be eliminated. New sources of nighttime lighting for Project uses would be added. Vehicles exiting the subterranean parking garage at night will project light onto the street and the first level of retail space on Glendon Avenue. Commercial uses are not considered light sensitive and no residential uses would be affected by lighting from structures on Glendon. Increased lighting on Glendon may be beneficial to nearby restaurants, enhancing security and enjoyment of the nighttime conditions in that vicinity. The Project's southern boundary abuts the Verizon switching station (formerly the GTE building) and the 22-story Westwood Center office building; the increased lighting here would not have a significant impact on those commercial uses. On the northern boundary, light emanating from windows and the building exterior would create no adverse lighting impacts on similar surrounding uses. Lastly, no commercial lighting would be located an the Tiverton Avenue side of the Project, and residential lighting there would be similar to and compatible with lighting in other buildings of near the same height across the street. Accordingly, Project lighting would not result in significant impacts.

Mitigation Measures

The Westwood Community Design Review Board will review Project lighting as part of an overall plan review process. Planning Director approval of the Project as proposed would include the Review Board's recommendations of the lighting plan. No mitigation measures beyond this ministerial approval are required or recommended.

Significant Project Impacts After Mitigation

The Proposed Project would not result in significant unavoidable adverse impacts.

Cumulative Impacts

Of the related projects, only the Westwood Marketplace, a retail shopping center that includes an Expo Design Center, Ralph's supermarket, Best Buy and Long's Drug Store, is close enough to the Project site to cumulatively contribute to the Project's impacts. This related project adds lighting to a commercial portion of Weyburn Avenue, but would be too far from Tiverton Avenue to significantly impact the residential uses there. The cumulative impacts would be less than significant.

Shading

Project Impacts

Shadow lengths resulting from the Proposed Project during each of the four seasons were calculated and their patterns projected on site vicinity maps showing the location of surrounding buildings, including potentially sensitive residential structures. The Project's degree of impact does not meet the thresholds of significance, and there are no other factors that would suggest a deviation from these thresholds in this instance. Therefore, the Project shadow impacts are not significant.

Mitigation Measures

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 adverse impacts.

Cumulative Impacts

No related projects that would add shadows beyond current conditions are located within shadow range of the Project's area of impact and would thus not contribute to or exceed the Project's range of shadow impacts. No significant cumulative impact would occur.

Air Quality

Project Impacts

Construction Phase Impacts

Short-term and temporary impacts will result from Project construction activities, including removal of existing pavement, grading, installation of infrastructure facilities, and building of structures. Air pollutants will be emitted by construction equipment and fugitive dust will be generated during demolition of the existing buildings and facilities on site and the excavation of the site for the subterranean parking structure. These activities would result in emission levels that exceed SCAQMD thresholds for NOx during the demolition phase and for NOx and ROG during the excavation phase, creating significant short-term construction impacts.

Operational Phase Impacts

The primary source of regional and local 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. Project regional emissions would exceed significance thresholds for CO and NOx, resulting in a significant impact. The local CO hot spot analysis found no significant local CO concentration impact.

Mitigation Measures

Required Construction Phase Mitigation

The following mitigation measures are required by the SCAQMD unless they can be shown to be infeasible and are intended to reduce pollutant emissions from construction activities.

1. Use low emission mobile construction equipment, where feasible.
2. Develop a trip reduction plan to achieve a 1.5 average vehicle ridership (AVR) for construction employees.
3. Water site and clean equipment morning and evening to comply with AQMP Fugitive Dust Measure BCM-03 and BCM-06.
4. Wash off trucks leaving the site to comply with AQMP Fugitive Dust Measure BCM-01. This suggested measure is already required by the SCAQMD.
5. Spread soil binders on site, unpaved roads and parking areas per SCAQMD Rule 403.
6. Apply chemical soil stabilizers according to manufacturer's specifications to all inactive construction areas (previously graded areas, which remain inactive for 96 hours).

7. Sweep streets if silt is carried over to adjacent public thoroughfares.
8. Reduce traffic speeds on all unpaved road surfaces to 15 miles per hour or less.
9. Suspend grading operations during first and second stage smog alerts.
10. Suspend all grading operations when wind speeds (as instantaneous gusts) exceed 25 miles per hour.
11. Maintain construction equipment engines by keeping them tuned.
12. Use low sulfur fuel for stationary construction equipment, as required by SCAQMD rules 431.1 and 431.2.
13. Provide on-site power sources during the early stages of the Project.
14. Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
15. Use low emission on-site stationary equipment (e.g., clean fuels).
16. Configure construction parking to minimize traffic interference.
17. Minimize obstruction of through-traffic lanes.
18. Provide a flagperson to properly guide traffic and ensure safety at construction sites.
19. Schedule operations affecting traffic for off-peak hours, where feasible.
20. Develop a traffic plan to minimize traffic flow interference from construction activities (the plan may include advance public notice of routing, use of public transportation and satellite parking areas with a shuttle service).
21. Provide rideshare and transit incentives for construction personnel.

Operational Phase Mitigation

Regional Emissions

Recommended Measures:

The most significant reductions in regional and local air pollutant emissions are attainable through programs that reduce the vehicular travel associated with the Project. Support and compliance with the AQMP for the basin is the most important measure to achieve this goal. The AQMP includes improvement of mass transit facilities and implementation of vehicular usage reduction programs. Additionally, energy conservation measures are included. None of these recommended measures are strictly required by SCAQMD. However, SCAQMD wants to see all relevant measures applied.

TDM Measures:

22. Schedule truck deliveries and pickups during off-peak hour. This will alleviate traffic congestion, and therefore, emissions during the peak hour. However, the quantity of the reduction is unknown.

23. Provide adequate ingress and egress at all entrances to public facilities to minimize vehicle idling at curbsides. Presumably, this measure would improve traffic flow into and out of the parking lot. The air quality benefits are incalculable because more specific data is required.
24. Provide dedicated turn lanes as appropriate and provide roadway improvements at heavily congested roadways. Again, the areas where this measure would be applicable are the intersections in and near the project area. Presumably, these measures would improve traffic flow. Emissions would drop as a result of the higher traffic speeds, but to an unknown extent.

25. Provide on-site services. Provide incentives such as on-site ATMs and other similar measures that address lifestyle needs. These measures reduce the VMT, but the air quality benefit can not be quantified because more specific data is required.

Energy Efficiency Measures:

26. Improve thermal integrity of the buildings and reduce thermal load with automated time clocks or occupant sensors. Reducing the need to heat or cool structures by improving thermal integrity will result in a reduced expenditure of energy and a reduction in pollutant emissions. The air quality benefit depends upon the extent of the reduction of energy expenditure which is unknown in this case. The air quality benefit is also unknown, therefore.
27. Install energy efficient street lighting. Implementation of this measure is not feasible because of varying definitions of the phrase "energy efficient."
28. Capture waste heat and reemploy it in nonresidential buildings. This measure is applicable to the commercial buildings in the project.
29. Provide lighter color roofing and road materials and tree planning programs to comply with the AQMP Miscellaneous Sources MSC-01 measure. This measure reduces the need for cooling energy in the summer.
30. Comply with the AQMP Miscellaneous Sources PRC-03, and Stationary Sources Operations Enhanced Inspection and Maintenance and ADV-MISC to reduce emissions of restaurant operations. Introduce efficient heating and other appliances, such as water heaters, cooking equipment, refrigerators, furnaces and boiler units. Also, incorporate appropriate passive solar design, and solar heaters. This measure is intended to reduce VOC and PM10 emissions.
31. Provide local shuttle and transit shelters, and ridematching services. This measure is recommended, but no information is available regarding its effectiveness in improving air quality. Such a program might reduce the VMT associated with the project. No evidence is available that VMT will be reduced by any significant amount, however.
32. Provide bicycle lanes, storage areas, and amenities, and ensure efficient parking management. This measure includes implementing the formation of bike clubs and providing additional bike racks, lockers, showers, bike repair areas, and loaner bikes. Also, provide lockers, showers, safe walk path maps, walk clubs and free walking shoes. These measures are necessary, but no data is available regarding the effectiveness of this package of measures. Quantification of air quality benefits is not possible because of this fact.
33. Provide preferential parking to high occupancy vehicles and shuttle services. Also, designate additional car pool or vanpool parking. The air quality benefit cannot be quantified.
34. Employers should provide variable work hours and telecommuting to employees to comply with the AQMP Advanced Transportation Technology ATT-01 and ATT-02 measures. These measures allow employees to have compressed workweeks, flextime, staggered work hours, or work out of their homes. The air quality benefit cannot be quantified.
35. Provide dedicated parking spaces with electrical outlets for electrical vehicles. This measure would accommodate electric car charging if any electric cars are driven by employees or customers. The air quality benefit depends upon the number of employees driving electric cars which is unknown in this case. The air quality benefit is also unknown.
36. Develop a trip reduction plan to comply with SCAQMD Rule 2202. SCAQMD Rule 2202 has revamped the requirements for carpooling. In general, mandatory carpooling is no longer required. Compliance with Rule 2202 will be mandatory.
37. Employers should provide ridematching, guaranteed ride home, or car pool or vanpool to

employees as a part of the TDM program and to comply with the AQMP Transportation Improvements TCM-01 measure. These services reduce the VMT, however, the air quality benefit cannot be quantified because more specific data is required.

38. Employers should provide compensation, prizes or awards to ridesharers. These measures include subsidizing costs or provide compensation to employees who carpool and vanpool.
39. Synchronize traffic signals. The areas where this measure would be applicable are roadway intersections within the project area. This measure would be more effective if the roadways beyond the project limits are synchronized as well. The air quality benefits are incalculable because more specific data is required.
40. Encourage the use of alternative fuel or low emission vehicles to comply with the AQMP On-Road Mobile M2 measure, and Off-Road Mobile Sources M9 and M10 measures. The technology required for this measure is slow in progress, and may not be practically applied to the project at this time. The air quality benefits are incalculable because more specific data is required.
41. Introduce window glazing, wall insulation, and efficient ventilation methods. The construction of buildings with features that minimize energy use is already required by the Uniform Building Code.

Local Air Quality

The Project will not result in a significant local CO air quality impact. No mitigation is required.

Cumulative Impacts

Cumulative Construction Impacts

Of the projects noted in the related projects table (Chapter IV, Table IV-1), none are anticipated to be close enough to, or on a similar schedule with, the Project to create significant cumulative construction air quality impacts. 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. Additionally, construction impacts are temporary in nature. No significant cumulative construction air quality impact is anticipated.

Cumulative Operational Impacts

Related future projects that are included in the adopted plans would be included in SCAQMD projections for the region and individual projects will be reviewed for impacts and mitigation measures required, where possible and applicable. Where related projects propose plan amendments, environmental documentation will be required to assess impacts and mitigation. Further, the SCAQMP and continuing updates of that plan are required to include air emission reduction strategies for the basin (such as increased stationary source emission controls, improved vehicle emission standards, transportation alternatives, etc.). These, in concert with individual project mitigation measures will help reduce impacts. However, until the Basin as a whole attains all federal and state EPA standards, which is not anticipated to occur until 2010, cumulative operational air quality impacts are deemed significant.

Significant Project Impacts After Mitigation

Mitigation will reduce emissions, but not to the point that they will fall under the SCAQMD's thresholds. Therefore, demolition and excavation emissions of NOx and ROG will exceed the SCAQMD thresholds even after mitigation, and construction impacts will be significant.

Demolition and excavation will occur over a relatively short period of time, approximately 9 months. It is unlikely that short-term construction activities will increase the frequency or severity of any ambient air quality standard violations during the construction period.

During operations, the Project will not result in any significant local air quality (CO hotspot) impacts due to vehicular air pollutant emissions. However, operation of the Project will generate regional air pollutant emissions that exceed the SCAQMD Thresholds of Significance for CO and NOx. Mitigation will reduce, but not eliminate, these significant impacts.

Cultural Resources

The Proposed Project will result in the demolition of Glendon Manor. The building is not listed in the Specific Plan as a designated cultural resource. However, it has been determined to be eligible for listing by the State Historic Resources Commission (although it has not been formally listed on the California Register), and is therefore analyzed as a significant historic resource for purposes of this EIR. Accordingly, demolition of this building would cause a substantial adverse change in the significance of this historic resource, and therefore, the Proposed Project will result in a significant impact.

Mitigation Measures

1. If Glendon Manor is removed, in accordance with general procedures, the minimal level of recordation of removal of the structure would be documentation of the building by way of an American Building Survey (HABS) report. Prior to the issuance of a demolition permit, the Applicant shall cause to be prepared a documentation survey of the property and building in accordance with the HABS standards. The HABS report shall include "scaled" building plans and archival quality photographs of the building. The document package shall be archived at an appropriate location to be determined by the City, in order to provide a permanent written and photographic record of the building for historic purposes.
2. In addition, it is recommended that copies of the HABS report be sent for curation to: the South Central Coast Information Center at Cal State Fullerton and the University of California, Los Angeles, Central Library.
3. Salvage elements of the building for renovation of other historic resources in the general area of Southern California as a whole (in this case cabinets, doors, wall fixtures, kitchen and bathroom fixtures, tile work, fire escapes, etc.). Professional companies specializing in the salvaging of such elements can be contacted and permitted to provide bids for the salvage operation(s).
4. Additional photographic documentation of the salvage operations and systematic removal of the structure to fulfill the record of the building design and construction materials. In addition, potentially significant artifacts or other data and construction materials. A qualified historic preservation professional shall be present on-site during demolition to ensure appropriate removal and handling of historic interior and exterior building elements for potential re-use.

Significant Project Impacts After Mitigation

The Project will have a significant impact on Glendon Manor, which is considered a historic resource for purposes of CEQA review, even after the application of Project mitigation measures.

Cumulative Impacts

The related projects in the Westwood area are not known to have significant historic resource impacts. The only project on the cumulative project list that is considered to have potential historic value is the Harvard-Westlake Middle School Improvement Project, located in Bel Air.

The Harvard-Westlake project's historic impact would not be related to the Proposed Project's impact, since the proposed Project's removal of Glendon Manor is significant expressly for its association with the development of Westwood Village. Harvard-Westlake school, based upon draft information available to the lead agency, is not known to have any common association with Glendon Manor. Therefore, the two projects do not contribute to a cumulative historic impact. No significant cumulative impacts would occur.

Geology

Project Impacts

The Project geotechnical study examined potential adverse subsurface conditions such as liquefaction potential, insufficient load-bearing strength of underlying materials and presence of expansive soils. Geotechnical analysis examined the potentially significant impacts with regard to excavation, seismicity and shallow groundwater. The construction of a three level subterranean parking structure requires a 55-foot deep excavation and the removal of 330,000 cubic yards of earth materials. Extensive shoring will be required to stabilize the surrounding properties, utilities, and roadways. Due to the extensive shoring requirements, this part of the construction process could create potentially significant adverse conditions with regard to worker safety and stability of surrounding structures if proper planning and precautions are not taken for the excavation and grading phase of development.

In addition, groundwater levels could affect construction of the Project. Since water levels were measured at depths ranging from 35 to 45 feet below the surface, de-watering may be required during construction. De-watering would temporarily lower groundwater levels and without proper mitigation, may cause local subsidence/settlement. Final geotechnical design refinements must consider this possibility. Based on the location of nearby active and potentially active faults, the site could be subjected to strong ground shaking in the event of an earthquake. Project implementation would increase the density of development and the human occupancy at the site, increasing the potential for damage or injury during a major earthquake. The Project would have potentially significant impacts with regard to excavation, seismicity and shallow groundwater prior to mitigation.

Mitigation Measures

1. The Project shall comply with all the requirements of the City of Los Angeles Building Code and recommendations of the site-specific soils and geology studies for excavation activities, including appropriate seismic requirements, dewatering requirements, and shoring requirements, as reviewed and approved by the City of Los Angeles Bureau of Engineering or Department of Building and Safety. Dewatering analysis must consider mitigation of settlement to neighboring structures.
2. Remaining on-site water level monitoring wells should be measured to confirm expected groundwater depths for purposes of confirming planned excavations, shoring, dewatering, and permanent drainage/pumping requirements. The Project Applicant shall coordinate with the City of Los Angeles Bureau of Engineering and Building and Safety on design to assure that substantial building inundation would not occur in the event of high groundwater during "wet" periods.
3. The Project shall comply with the National Pollutants Discharge Elimination System Permit regulations for the short and long-term discharge of groundwater from the site.
4. Excavation and grading activities shall be scheduled during dry weather periods. If grading occurs during the rainy season (October 15 through April 1), construct diversion dikes to channel

runoff around the site. Line channels with grass or roughened pavement to reduce runoff velocity.

5. Incorporate appropriate erosion control and drainage devices to the satisfaction of the Building and Safety Department shall be incorporated, such as interceptor terraces, berms, "vee-channels", and inlet and outlet structures, as specified by Section 91.7013 of the Building Code, including planting fast-growing annual and perennial grasses in areas where construction is not immediately planned. These will shield and bind the soil.
6. Stockpiles and excavated soil shall be covered with secured tarps or plastic sheeting.

Significant Project Impacts After Mitigation

Based on City standard of acceptable risk reflected in the City of Los Angeles Building Code and the performance review procedures of the Bureau of Engineering and Department of Building and Safety, no significant Project impacts would remain after implementation of the Project mitigation measures.

Cumulative Impacts

The Project is not located adjacent or close enough to any of the related projects to compound any of the potential engineering geology or geotechnical impacts from development. Further, all related projects would require municipal government approvals of grading plans, design, and the imposition 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 and related projects would be subject to potentially severe ground motion during a severe earthquake. Assuming adherence to building codes and other locally imposed plans, cumulative seismic impacts would be reduced, but not eliminated. Related projects would not be exposed to a greater than normal seismic risk than other areas in Southern California. To the degree that these projects bring together a greater concentration of people, the immediate post-earthquake evacuation and assistance will be more difficult. However, related projects should not significantly compound the specific effects that could occur on the Project site. Therefore, cumulative geology, soils, and seismic impacts should not be considered significant.

Hazardous Materials

Project Impacts

Methane Gas and Oil Contamination

The Project site is located over 3,600 feet to the west of, and will not limit access to, the Sawtelle Oil Field. No evidence of releases of hazardous materials into the soil was identified in the Project soils report or the Project's Phase I Environmental Site Assessment Update. Therefore, the risks associated with methane gas and hydrocarbon contamination on the Project site is not anticipated, and these factors do not represent a potentially significant impact.

Asbestos

Structures on the Project site that were identified as including Asbestos Containing Materials (ACM's) have been, or will be demolished, as part of the Proposed Project. For the recent demolition of the retail space on the west side of Glendon, a pre-demolition inspection was completed and filed with the South Coast Air Quality Management District; removal and disposal was performed by a licensed asbestos abatement contractor in accordance with applicable environmental asbestos abatement measures. The remaining structures that are slated for

demolition will also be surveyed for asbestos prior to their demolition. If asbestos is present, abatement measures will be performed for the demolition of these structures to ensure the health and safety of construction workers and those in the surrounding community. These laws address safe handling and disposal such that construction workers and those in the surrounding community are not adversely affected. Adherence to procedures outlined in the laws will assure that there will be no significant impact from asbestos due to the demolition.

Groundwater

No contamination of groundwater was found in recent tests. However, any groundwater encountered during site preparation and grading activities must be discharged in accordance with NPDES requirements to assure that pollutants will not be introduced into the storm drain system. Adherence to these requirements would assure a less than significant impact.

Lead - Based Paint

Lead-based paint was found to be present in certain structures on the property. Demolition in the summer of 2002 followed all required lead-based paint abatement procedures. Compliance with lead-based paint abatement measures will also be required for demolition of all remaining structures. Adherence to procedures outlined in State and Federal laws regarding lead-based paint will assure that there will be no significant impact from lead-based paint (see mitigation measures below) due to the demolition.

Mitigation Measures

No impact to the Project would occur with regard to Methane Gas and Oil Contamination; thus, no mitigation is warranted. Adherence to existing regulations for the handling and disposal of asbestos and lead-based paint and for the discharge of any groundwater from the site will be required as part of the Project. Adherence to existing laws is required as a matter of course; however, these requirements are listed below for clarification of the requirements.

1. A licensed Asbestos Inspector shall be retained to determine the presence of asbestos and asbestos containing materials (ACM) within structures to be demolished on the Project site, consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, Occupational Safety and Health Administration (OSHA), 29 CFR 1910.1001, 1926.1101, and 1915.1001. The Project Applicant shall be required to comply with all applicable State and Federal ACM Abatement policies and procedures for removal of ACM's present on the site.
2. Discharge of any groundwater from the site must comply with NPDES discharge requirements.
3. A licensed Lead-Based Paint Inspector shall be retained to determine the presence of lead-based paint and lead-based paint containing materials (LBPCM) within structures to be demolished on the Project site, consistent with the 1994 Federal Occupational Exposure to Asbestos Standards, Occupational Safety and Health Administration (OSHA), 29 CFR 1910.1001, 1926.1101, and 1915.1001. The Project Applicant shall be required to comply with all applicable State and Federal LBPCM policies and procedures for removal of LBPCM's present on the site.
4. Should the Department of Building and Safety require it, the Applicant will perform the Soil and Gas Survey to the satisfaction of the Department of Building and Safety (including mitigation to the satisfaction of that department, if required) to assure no project related hazards.

Significant Project Impacts After Mitigation

Project impacts are less than significant.

Cumulative Impacts

The related projects must individually be evaluated for asbestos and lead-based containing materials. Mitigation measures will be required on an individual project basis, where appropriate. Since impacts are local to the individual sites, with proper disposal as required by law and mitigation measures, there would be no cumulatively significant impact with regard to asbestos and lead-based paint. Project methane and oil gas impacts will be less than significant, and thus the Project will not contribute to any potentially cumulative impacts.

Land Use

Project Impacts

Land Use Compatibility

Land use compatibility issues for the Proposed Project are related to the site's location within Westwood Village and its proximity to residential communities to the east, along with its immediate adjacency to Village retail uses. These considerations were examined with respect to the issues of consistency with land use patterns in the area and compatibility with adjacent uses. As a mixed-use Project, it will function as a transition between the retail/commercial uses and residential uses existing in the surrounding area. Design features, including driveway locations, and the presentation of a residential Project "face" on Tiverton Avenue, will help provide this transition. Each of the four Project edges was evaluated, and no significant adverse impacts with regard to land use patterns and adjacent uses were found.

Land Use Plan Consistency

The Project requires an amendment to the City of Los Angeles General Plan Circulation Element, a number of amendments to the Westwood Village Specific Plan, as well as other discretionary actions (see Intended Uses of the EIR, above). The Project, incorporating these amendments, was reviewed for compliance with the stated goals, polices objectives and purposes of the Westwood Community Plan and the Specific Plan. Additionally, the proposed revision to the General Plan circulation element was reviewed. The Project would be consistent with the goals, policies, objectives and purposes of the Westwood Community Plan and the Specific Plan in many aspects, including the encouragement of Mediterranean architecture, a pedestrian environment, mixed-used development; the provision of quality residential housing and adequate multi-family housing in particular; and the promotion of a strong competitive commercial sector, with an emphasis on the need for neighborhood-serving commercial development. The Project proposes to eliminate a structure deemed eligible for listing on the State Historic Register. Because of the eligibility for listing, the demolition of this structure has been analyzed as significant for purposes of CEQA. However, the building is not listed as having cultural or historic significance in the Specific Plan; therefore, no Specific Plan amendment is required for its demolition. To the extent its demolition could, nevertheless, be considered an adverse land use impact, given the Project's consistency with the vast majority of the plans' policies, the Project would have a less than significant impact with regard to land use consistency with the Westwood Community Plan and the Westwood Village Specific Plan. In addition, the Project would re-designate Tiverton Avenue from a Secondary Highway to a Collector Street. Given the low volume of trips on the street, the one-way travel, and the proximity to other Secondary Highways that can adequately serve the area, this change was not found to be significant. The Project would not pose a significant impact with respect to consistency with the General Plan Circulation Element.

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.

Cumulative Impacts

Chapter IV provides a list of projects that are planned or are under construction in the Project area. Most of the non-UCLA projects will develop commercial office or retail space; two residential projects will develop a total of 280 condominium units. The Westwood Marketplace project along the north side of Weyburn Avenue to the north of the Project site, includes a retail shopping center (including an Expo Design Center, Ralph's supermarket, Best Buy and Longs Drug Store). Since the Proposed Project and other developments planned or existing in the area are consistent with the overall existing and planned land use patterns in the area, cumulative impacts in this regard are not expected. As discussed above, the Proposed Project is compatible with existing uses immediately surrounding the site. Moreover, the Project will remain compatible with other known proposed and recent development in the area, such as the Westwood Marketplace project (the only related project in the immediate vicinity of the site). The proposed Palazzo Westwood Project, a mixed-use project with a neighborhood-serving retail component, is consistent with and complementary to the recent introduction of additional neighborhood-serving retail uses in the Westwood Marketplace project. Therefore, cumulative land use impacts are not expected.

Noise

Project Impacts

Construction Phase Impacts

Construction noise represents a short-term impact on ambient noise levels. Noise generated by demolition and excavation equipment, including trucks, graders, bulldozers, concrete mixers and portable generators, constitute the most persistent source of noise throughout the construction period. For the Proposed Project, the highest noise generating activities are expected to be the demolition of the two existing buildings on site and the excavation of the subterranean parking structure, when heavy trucks are idling and circulating within and adjacent to the site. At 200 feet, peak construction noise levels will range from 58 to 83 dBA. The nearest residences on Tiverton Avenue will be located more than 200 feet from the nearest demolition activities. The typical peak noise heard at these properties (exterior noise) from demolition activities is estimated at about 70 dBA. Average noise levels at the residences during demolition activities will likely be approximately 65 dBA, which is within the limit of the desired noise range level for residential uses. Following demolition, peak exterior noise levels heard at the residences during excavation and other construction activities could reach as high as 99 dBA for short periods of time. As heavy equipment passes near homes, the noise level would reach a maximum of approximately 80 dBA outside the homes. Average noise levels, however, are expected to range between 65 and 70 dBA. This represents a less than 10 dBA increase over the current measured ambient noise levels. Project construction noise impacts will be moderated by the mitigation measures below, but would be considered significant even after mitigation.

Operational Impacts to Off-Site Uses

Project activities that could potentially result in noise impacts to off-site uses are parking lot activities, loading dock activities and mechanical equipment. An evaluation of existing and future traffic volumes on surrounding roadways indicated that traffic noise levels would increase more than 3.0 dB over existing conditions with the Project along only one roadway segment, Weyburn Avenue east of Tiverton. The Project contributes 1.6 dB of this increase. However, the future with Project noise level along this roadway segment will not exceed 65 CNEL. Therefore, no land use will be exposed to a noise level categorized as Normally Unacceptable or Clearly Unacceptable in the City of Los Angeles Noise Guidelines. All other noise level increases over existing conditions are less than 3dB. Therefore the Project will not result in significant cumulative off-site noise impacts.

On-site activities that may generate noise, such as parking lot activity, garbage collection and delivery dock activity, mechanical equipment operation and outdoor dining are regulated by City ordinances and codes. Many of these activities would be out of range of the residential off-site uses, which are considered sensitive to noise, typical mechanical equipment expected for this project is not expected to generate noise levels at any of the neighboring properties that would approach or exceed the "Normally Unacceptable" or "Clearly Unacceptable" categories in the City's Noise Guidelines. Compliance with Section 112.02 of the municipal code is expected to limiting the maximum increase in ambient noise levels to 5 dB, therefore, the operation of the project's mechanical equipment would not result in a significant noise impact.

The primary source of noise from deliveries and loading docks is noise generated by the trucks as they arrive and depart the loading docks. Noise generated by these activities are generally minor with occasional short duration impulse noises, which are typically not great enough in level and duration to significantly affect long-term average noise levels such as CNEL. Noise levels along Tiverton Avenue are the lowest of the three loading dock locations, and residential uses along Tiverton are located approximately 140 feet from the loading dock. It would take more than 80 daily semi-trailer trucks (or 275 medium 2-axle trucks) to result in the future CNEL levels along Tiverton to increase by more than 3 dB. This is much greater than the level of activity expected for the loading docks. (The actual number of delivery trucks cannot be known until tenants are selected for the Project.) Therefore, operation of the loading docks would not result in a CNEL noise increase greater than 3 dB and not result in a significant noise impact.

Operational Impacts to On-Site Uses

Noise impacts were also evaluated on the new Proposed Project residences. There is a potential for area and Project traffic to generate a significant impact on the Project residences. As no outdoor residential living areas would be located closer to the roadways than the building faces, the study evaluated noise levels at the Project building faces. Noise levels will not exceed 65 dBA at these locations, which would be within the desired noise range for residential development. The Project design includes mechanical ventilation systems, which allow doors and windows to remain shut, which would result in meeting the 45 dBA interior noise level standard. Thus, no significant noise impacts would occur to Project residences.

Mitigation Measures

The following construction mitigation measures will reduce, but not eliminate significant construction noise impacts. Operational impacts are not deemed significant and do not require mitigation measures. Nevertheless, operational requirements and mitigation measures are included below, for clarification:

Construction Phase Mitigation

1. The Applicant shall comply with the construction hours as specified by the City LAMC Noise Ordinance, Chapter IV, Section 41.40. LAMC, which prohibits construction before 7:00 a.m. or after 6:00 p.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday or any national holiday, and at anytime on Sunday.
2. The Applicant shall prepare a construction related traffic plan detailing proposed haul routes and staging areas for the transportation of materials and equipment, with consideration for sensitive uses in the neighborhood. A traffic and parking plan for the construction phase will be submitted for approval by LADOT and the Department of Building and Safety prior to the issuance of any permits.
3. A plywood barrier wall for security and noise protection shall surround the subterranean excavation. This plywood barrier will have a minimum thickness of 3/4" and have no gaps, cracks or holes.
4. All equipment operating on site shall have properly operating mufflers.
5. Equipment and material staging and siting of cranes, hoists, or other semi-stationary heavy equipment shall be as far from noise-sensitive uses as practical.
6. Electrically powered equipment shall be used instead of internal combustion engine driven equipment, where feasible.
7. No deliveries shall be permitted before 7 a.m. or after 9 p.m.

Operational Phase Mitigation for Impacts to Off-Site Uses

8. Mechanical equipment required for the Project includes parking garage exhaust fans and retail and residential HVAC units, which shall all comply with the noise standard contained in Section 112.02 of the City LAMC Noise Regulations. The Project Applicant shall provide equipment specifications to the Department of Building and Safety demonstrating that the equipment meets the City Noise Regulations.

Operational Phase Mitigation for Impacts to On-Site Residences

9. To allow Project residences' windows and doors to remain closed, adequate ventilation per the Uniform Building Code must be provided. Windows are not required to be sealed shut, but closeable at the occupant's discretion. Air conditioning, which will satisfy the ventilation requirements, shall be included for all affected residential units. The units requiring mechanical ventilation are indicated in **Figure V.G-3** of the Draft EIR.

Significant Project Impacts After Mitigation

Despite mitigation measures, Project noise impacts would be significant during construction. During operations, the Proposed Project would have no significant unavoidable noise impacts and therefore does not require mitigation. The measures listed above are provided for clarification of design features and required City Code compliance.

Cumulative Impacts

Construction Phase Cumulative Impacts

Of the projects noted in the related projects table (Chapter IV, Table IV-1), none are close to the project or on a schedule similar to the Project to create a cumulative construction noise impact. It is very unlikely that trucks hauling materials from the Project combined with other projects would result in traffic CNEL increases greater than 3 dB. For example, it would take 400 trucks along a

small roadway with an ADT of 5,000 to result in a 3 dB noise level increase. Therefore, no significant cumulative noise impact is anticipated.

Operational Phase Cumulative Impacts

The noise analysis contained in this section includes cumulative future conditions. No additional cumulative analysis is required. Significant impacts before mitigation occur only to the Project from surrounding streets. The Project's contribution to area noise levels is below the thresholds established in the City of Los Angeles noise requirements. With adherence to City requirements, the Project does not significantly contribute to cumulative noise impacts in the area.

Population and Housing

Project Impacts

Population Growth

The Proposed Project would develop a new mixed-use development that includes 350 residential units with an anticipated population of about 672 people. Because there are no occupied residential units on-site, the Proposed Project would result in a net increase of 672 people. This population increase would be within the projections of the SCAG's Los Angeles subregion, which is expected to grow from a 1990 population of 3,618,000 to 4,766,000 by 2010 and within projections for the Westwood Community Plan Area population, which is projected to grow from 41,295 people in 1990 to a 2010 population of about 49,605. The Proposed Project's population comprises 0.06 of the 1990-2010 SCAG subregion increase and 8.07 percent of the Community Plan area increase. The Project's population increase is within and consistent with local and regional planning projections regarding population growth. Therefore, the Proposed Project would not result in a significant impact with respect to consistency with local and regional planning projections.

Consistency with Population Growth and Housing Policy

The Proposed Project was reviewed for consistency with each of the relevant population and housing policies as contained in regional and local planning documents. Based on this review, the Proposed Project would be generally consistent with regional and local policy regarding population growth and housing. The elimination of the existing 42 units in Glendon Manor is not a significant displacement of housing units, given that none of those units is currently occupied. Moreover, the Project will result in a net increase of 308 units (350 new units minus 42 existing units).

Mitigation Measures

The Proposed Project would not result in a significant adverse impact with respect to population growth, housing policy, or housing displacement, 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 growth, supply, affordability, displacement or policy either before or after mitigation.

Cumulative Impacts

Chapter IV provides a list of projects that are planned or under construction in the Project area. Although most of these projects will develop commercial office or retail space, two residential projects will add a total of 280 condominium units to the housing stock in the Westwood area. Based

on a multiplier of 1.92 persons per dwelling unit,[8] these units would add a population of about 538 to the Westwood area. The population increase attributable to the Proposed Project (672 people) plus related projects would be 1,210. This increase would remain well within the projected 1990-2010 population increases for SCAG's Los Angeles subregion and the Westwood Community Plan Area, cited above. Therefore, cumulative impacts would not be significant.

Public Services

Fire Protection

Project Impacts

According to the Los Angeles Fire Department (LAFD), staffing at area fire stations is adequate to meet the demand for service in the area. Currently, water pressure to the Project site is not adequate to provide required fire flows for the Proposed Project. DWP has yet to resolve the extent of upgrades required for the Proposed Project. Projects in the area contribute a fair share towards upgrades through the Fire Hydrant Main and Replacement Fund, a Citywide trust fund administered by the LAFD. The Project will be within the desired distance from a fire station and can be adequately served by existing facilities and staff. The temporary street closure of Glendon Avenue during construction activities will not result in a significant emergency access impact, since other larger capacity streets (Westwood Boulevard, for example) would serve the area in this short-term period. The Project site plan conforms to access requirements of the Los Angeles Municipal Code, which conforms to LAFD requirements. The LAFD will confirm compliance during site plan review, prior to construction.

Mitigation Measures

Although Project impacts would be less than significant, and mitigation measures beyond code compliance would not be required, the following sets forth the City fire safety requirements:

1. The Project shall comply with Fire Department plot plan approval requirements relative to fire safe design features prior to building permit approval. These recommendations will include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant; and entrances to any dwelling unit or gust room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.
2. The final construction plans of all proposed developments in the Project area shall be submitted to the LAFD to determine the location and number of off-site public and on-site private hydrants required.
3. At least two different ingress/egress roads for each area, which will accommodate major fire apparatus and provide for major evacuation during emergency situations, shall be required.
4. The Proposed Project shall comply with all applicable State and local ordinances, and the guidelines found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, from the City of Los Angeles General Plan (C.P.C. 19708).
5. The Project will pay the appropriate fee assessment in accordance with the Fire Hydrant Main and Replacement Fund Ordinances, which shall be used to fund the necessary upgrades to the fire water system.

[8] City of Los Angeles General Plan, Westwood Community Plan, page III-3. Multiplier is for High Medium residential land use category.

6. Adequate address signage will be provided to the satisfaction of the LAFD, to facilitate with response times.

Significant Project Impacts After Mitigation

No significant Project impacts would occur. The mitigation measures above provide clarification of City requirements.

Cumulative Impacts

Adequate water pressure is currently not available to serve the Proposed Project and other related projects currently under development or proposed in the Westwood area. This potentially significant cumulative impact can be mitigated by the contribution of the, proportionate "fair share" to the Fire Hydrant Fund as discussed above, as well as by individual related project design and mitigation measures.

Police Protection

Project Impacts

Development of the Proposed Project would generate additional residents, pedestrians, and vehicular traffic in the Project area, possibly incrementally increasing demands for law enforcement and protection services provided by the Los Angeles Police Department (LAPD). However, the Project would also eliminate crimes that might currently occur due on the blighted site, which contains vacant stores and unsightly parking lots. The Project would bring activity to the currently underutilized street alleyways and spaces that may be prone to vandalism, loitering and other criminal activities that occur in vacant urban environments with low patronage.

The LAPD has determined that a Project the size of Palazzo Westwood would have a less than significant impact on police services in the West Los Angeles Area[9], considering the current level of staffing in the West Los Angeles Area and the anticipated Project-related increase in residents, pedestrians and vehicular traffic. Additionally, tax revenue generated by the Proposed Project would add funding to the City of Los Angeles for distribution to the City Departments, including the LAPD.

The LAPD recommends the Project Applicant interact with the Community Relations Section (CRS) of the LAPD, to obtain information regarding crime prevention features appropriate to the design of the Proposed Project. Implementation of CRS recommendations would serve to further reduce the less than significant Project impact.

Mitigation Measures

Although impacts are not significant, the Department of City Planning requires the following mitigation measure:

1. The Project shall provide on-site security systems, lighting and adequate address signage to increase security and facilitate police response to the site. Security system designs shall be submitted to LAPD for review.

[9] Los Angeles Police Department written communication from Commanding Officer David J. Kalish, Commander and Commanding Officer, Community Affairs Group, LAPD, to Envicom Corporation, September 20, 2000.

Significant Impacts After Mitigation

No significant impact would occur.

Cumulative Impacts

Related projects in the area would add demands on the LAPD West Los Angeles Area Reporting District (RD). However, each of these potential related projects must be reviewed for potential impacts, and mitigation measures must be required if significant impacts are found. Therefore, no significant cumulative impact with respect to the Project is expected.

Schools

Project Impacts

The Proposed Project will develop 350 new residential apartment units and 115,000 square feet of neighborhood retail uses on a primarily vacant/unoccupied site. The Project's residential component would generate approximately 44 elementary, 18 middle school, and 18 high school students, which could be accommodated at Warner Elementary school, Emerson Middle School and the University High School, respectively. An evaluation of local school capacity shows that all of these students could be accomodated. Therefore, the Proposed Project would not result in a significant impact on local, elementary middle or high schools.

Mitigation Measures

The Proposed Project would not result in a significant impact on public schools. Therefore, mitigation measures are not required to reduce the Project's impacts to a less than significant level. Nevertheless, payment of required school impact fees would offset any potential impacts on school services and facilities.

Significant Project Impacts after Mitigation

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

Cumulative Impacts

The Proposed Project's student generation will contribute incrementally to a cumulative increase in the demand for educational facilities and services associated with other developments planned for the Westwood area. However, with required individual project payment of school fees, this cumulative impact is anticipated to be less than significant.

Parks

Project Impacts

The Proposed Project is expected to house about 672 residents. In order to meet the City's goal of 4 acres of parkland per 1,000 people, the Proposed Project would need to provide about 2.69 acres or 117,090 square feet of recreational land. The provision of 39,153 square feet (0.90) of recreational space and facilities will partially accommodate the recreational demand generated by the Proposed Project. Given the currently inadequate supply of park space within the community and because the Project will not provide sufficient park space to meet the City's goal of 4 acres per 1,000 people, the Project will result in a significant impact on parks and recreational facilities prior to mitigation.

Mitigation Measures

The Proposed Project will pay an in-lieu fee, as set forth in the City's Zoning Code (Ordinance 141,

422, Los Angeles Municipal Code Section 17.12). This fee will be based on the number of units and the zoning for the Project site. Credit may also be given for recreational facilities provided as part of the Project, upon City Department of Recreation and Parks agreement.

Significant Project Impacts After Mitigation

With implementation of the mitigation measure identified above, the Proposed Project's impacts on parks and recreation would be reduced to a less than significant level. Therefore, the Project would not result in significant unavoidable impacts on parks and recreational facilities.

Cumulative Impacts

General growth and specific development proposals in the Westwood area will contribute to a cumulative increase in the demand for recreational facilities. Most of the development planned for the area is commercial, providing additional square footage of office and retail space. The related project list identifies two residential projects that will develop a total of 280 condominium units. An increase in the population within the Project area will result in a proportional increase in the demand for recreational facilities, which could marginally exacerbate the shortage of 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 or to pay in-lieu park fees to mitigate their impacts. Therefore significant cumulative impacts are not expected.

Libraries

Project Impacts

The Proposed Project's estimated 672 residents (and to a more limited extent its approximately 575 on-site employees) would create demands for local library facilities and service. The Los Angeles Public Library's planned 12,500 square-foot Westwood Branch Library will provide capacity to serve a population of 50,000 to 100,000 people, and the US Census estimates a current population of about 58,590 people within the Westwood service area. The new library would adequately accommodate the Project demand, no significant impact on library facilities would occur.

However, the Proposed Project's demand for library service may require the Library to hire added staff, and purchase more books, furniture, and equipment. Therefore, the Proposed Project would have a significant impact on library services.

Mitigation Measures

The Project Applicant will be required to pay an assessment to the Los Angeles Public Library for staff, books, furniture and equipment, based on per capita usage created by the Project.

Significant Project Impacts After Mitigation

After the implementation of the Project mitigation measure, no significant impacts on library facilities and services will occur.

Cumulative Impacts

General growth and specific development proposals in the Westwood area are expected to contribute to a cumulative increase in the demand for library facilities and services. Related projects include a total of 280 residential (condominium) units. However, the planned Westwood Branch Library will be designed to accommodate a population range of 50,000 to 100,000 people, over a current baseline population of 58,590 people. Accordingly, the proposed 280- unit

condominium project will not create an impact on library facilities, but will create an impact on library services that would be considered significant, unless mitigated.

Transportation / Traffic

Project Impacts

Project Construction Impacts

Traffic during construction would be generated by activities including construction equipment, crew vehicles, haul trucks and trucks delivering building materials. Hauling of earth and debris would be restricted to a haul route approved by the City of Los Angeles. Haul sites identified are Lopez Canyon Landfill, Terminal Island and the Playa Vista development site. Trucks hauling of earth and debris would be directed to travel south on Glendon Avenue to Wilshire Boulevard, turn right to the San Diego Freeway, and then travel either north to Lopez Canyon Landfill or south to either of the other two sites. Return trucks would follow the same route. No truck staging or travel would occur on Weyburn or Tiverton Avenues. Truck activity would generate significantly fewer trips than the Project would at buildout, and no significant intersection volume impacts are anticipated. Nevertheless, a construction traffic control plan will be developed to the satisfaction of LADOT. The Project would be required to comply with all City regulations for demolition, construction and hauling, including hours of construction and haul route locations and conditions. With compliance, no significant impact would occur.

Project Parking Impacts

Parking for the Project will be provided by a multi-level subterranean parking structure. This structure will provide 1,452 spaces for the Project. This level of parking supply is more than adequate to provide for the parking demands of the Project, meeting code requirements. No significant impact would occur.

Project Intersection Impacts

A Project traffic study was performed, following City of Los Angeles Department of Transportation (LADOT) requirements. Based on an intersection impact analysis, the Project is expected to have a significant impact at 13 of the 36 study intersections during the evening peak hour. These intersections are: Sunset Boulevard & Veteran Avenue (Intersection 1), Sunset Boulevard & Hilgard Avenue/Copa de Oro Road (Intersection 2), Montana Boulevard / Gayley Avenue & Veteran Avenue (Intersection 5), Le Conte Avenue & Hilgard Avenue (Intersection 11), Weyburn Avenue & Gayley Avenue (Intersection 13), Weyburn Avenue & Westwood Boulevard (Intersection 14), Weyburn Avenue & Hilgard Avenue (Intersection 17), Lindbrook Drive, Glendon Drive & Tiverton Avenue (Intersection 24), Wilshire Boulevard & Sepulveda & Westwood Boulevard (Intersection 29), and Wilshire Boulevard & Glendon Avenue (Intersection 30) and Ohio Avenue & Westwood Boulevard (Intersection 35). No significant impacts would occur during the morning peak hour. Mitigation measures, listed below, would reduce the Project impact to a less than significant level.

Freeway Impacts

A significant impact would occur if, the Project added 160 vehicles per hour (VPH) or more per direction for a four-lane freeway segment, or 200 VPH or more per direction for a five-lane segment. The maximum peak hour freeway volume increase attributable to the Project would be significantly less (no more than an estimated 18 trips in any direction on the studied segments during peak hours). Therefore, no significant Project-related impacts to the freeway system are expected.

Neighborhood Traffic Impacts

A neighborhood traffic intrusion analysis was conducted along four neighborhood streets (Weyburn Avenue, Lindbrook Avenue and LeConte Avenue, to the east of Hilgard Avenue, and Montana Avenue, west of Veteran Avenue). These segments are currently utilized as "cut-through" routes to avoid the congested intersections along Wilshire Boulevard south of the Westwood Village and could be potentially impacted by Project patrons and residents as well. The analysis showed no significant neighborhood impacts would occur, based upon West Los Angeles Traffic Improvement and Mitigation Program (TIMP) thresholds.

Mitigation Measures

Construction Phase

Traffic impacts associated with the construction actives and the closure of Glendon Avenue are short-term adverse impacts, and are therefore less than significant. Nevertheless, it will be necessary to develop and implement the following mitigation measures to adhere to City requirements and to further reduce impacts:

1. 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 requirements to mitigate the traffic impact during construction.

Operational Phase

As discussed previously, the Project is expected to significantly impact six of the thirty-six study intersections during one or both of the peak hours. In order to mitigate the traffic impacts at these intersections, several roadway improvements were considered for implementation by the Project. These improvements include traffic signal enhancements, minor roadway widenings, and intersection restripings. The roadway improvements considered as mitigation are listed and described below.

2. Weyburn Avenue and Westwood Boulevard - Restripe the intersection to provide a shared left-turn/through lane and a shared right-turn/through lane in the westbound direction. This improvement could require the removal of up to two metered on-street parking spaces on the north side of the east leg of the intersection.
3. Lindbrook Drive and Glendon Avenue/Tiverton Avenue - Restripe the eastbound and westbound approaches of Lindbrook Drive at this intersection to provide a left-turn only lane, one through lane and one through-right shared lane for westbound Lindbrook Drive. Modify the signal phasing if necessary.
4. Wilshire Boulevard and Glendon Avenue - Restripe the south leg of Glendon Avenue to provide two northbound through lanes (one shared left-turn/through lane and one shared through/right-turn lane). PM peak hour parking restrictions currently exist along the east side of Glendon Avenue south of Wilshire Boulevard, and therefore, no parking removals are necessary.

In addition to the recommended physical intersection improvements described above, the project should contribute to the installation of the following traffic signal enhancement measure.

5. Install ATCS - Contribute to the installation of the City's Adaptive Traffic Control System (ATCS) in the study area. The ATCS system is an automated traffic signal coordination system

designed as an upgrade to the current Automated Traffic Surveillance and Control (ATSAC) system currently implemented in the project vicinity. ATSAC/ATCS monitors traffic volumes and travel demands throughout a network of signalized intersections, and adjusts traffic signal timing and phasing in real time to maximize the capacity of the intersections and reduce delay.

Significant Project Impacts After Mitigation

To evaluate the proposed mitigation improvements, a supplemental analysis was conducted, using the same intersection evaluation techniques and methodologies as described previously, but assuming the recommended mitigation measures are in place. The results confirmed that the recommended mitigation improvements will reduce the expected impacts of the Proposed Project to less than significant levels at the six affected intersections. Implementation of the measures listed above will reduce Project traffic impacts to levels of insignificance at all of the study intersections.

Cumulative Impacts

Traffic that related projects are expected to generate was estimated and included in the future conditions analysis in the Project Traffic Study. As with the Proposed Project, individual project impacts would need to be addressed, where significant, in a project traffic study. A worst case analysis calculates cumulative impacts prior to mitigation as being significant at 11 intersections in the morning peak hour and 23 intersections during the evening peak hour. Significant impacts would require mitigation. The Proposed Project's impacts would be less than significant after mitigation, and this would likely be the same for many related projects. However, future project mitigation measures are not known, and therefore cumulative impacts are conservatively assumed to be significant before and after mitigation.

Utilities and Service System

Wastewater

Project Impact

The Proposed Project would generate sewage in an estimated amount of 68,500 gallons per day (GPD). Existing land uses to be removed are responsible for a producing 11,680 GPD (based upon development on-site at the time of the NOP). Therefore, the Proposed Project will result in a total net increase of 56,820 GPD. Generation of 56,820 GPD of waste water from the Proposed Project would represent 0.0158 percent of the 360 million gallons per day currently treated at the Hyperion Treatment Plan (HTP). The Project land uses are consistent with uses allowed on the Project site by the Westwood Village Specific Plan, and would therefore be within the expected development to be served. With recent expansions, HTP is anticipated, to be adequate to serve its service area through 2010. Additionally, the Project will comply with the City's water conservation and sewer allocation ordinances. Based on the City of Los Angeles Bureau of Sanitation Sewer Availability Report (November 14, 2000), the existing waste water infrastructure that would serve the Proposed Project was determined to have excess capacity available. The potential impacts from the Proposed Project with regard to waste water infrastructure and treatment would be less than significant.

Mitigation Measures

Wastewater impacts related to the Proposed Project are anticipated to be less than significant. Nevertheless, incorporation of the following mitigation measures would further lessen any potential impacts:

1. The Project shall implement all water-conserving mitigation measures outlined in the Water Section of this Environmental Impact Report.
2. Prior to Project development, a flow test of downstream sewer lines shall be conducted to determine if existing sewer lines serving the Project site still have adequate capacity to serve the Project. If any improvements to the local sewage collection lines are required, the Applicant and the City shall determine the Applicant's reasonable pro rata share of the cost for sewer system improvements.

Significant Project Impacts After Mitigation

Project impacts are less than significant.

Cumulative Impact

Projects on the related project list would generate waste water at an estimated rate of 823,279 GPD. Adding the Proposed Project would result in a total generation of 880,099 GPD of waste water. Assuming that related projects comply with the City's water conservation policies and the sewer allocation ordinance, as required, cumulative impacts to the waste water treatment systems would be considered less than significant. Additionally, HTP's full secondary treatment facilities allow for a capacity of 450 MGD. No significant cumulative impacts are anticipated.

Stormwater

Project Impacts

Construction Impacts

Without proper care, pollutants can enter the storm water system during construction. Pollutants include construction materials or byproducts (e.g., adhesives, cleaning agents, paint and plumbing materials) and sedimentation (eroded soil that enters the storm drain system). The Proposed Project must comply with the National Pollution Discharge Elimination System (NPDES) requirements. The Project site is less than five acres, and therefore does not require a General Construction Activity Storm Water Permit (GCASP). However, a Storm Water Pollution Prevention Plan (SWPPP) is required to address all of the construction-related impacts from the Proposed Project. Potential impacts would be mitigated through the use of Best Management Practices (BMPs). According to the City of Los Angles Bureau of Engineering, compliance with the SWPPP would mitigate short-term impacts to a less than significant level.

Operational Impacts

The Proposed Project site is currently covered with impermeable surfaces, including parking lots and structures. All storm water on the Project site is conveyed to the storm drain system through the gutters of the buildings and sheet flow over the parking lot surface. Since the majority of the site is currently covered with impermeable surface, development of the Proposed Project will not result in additional flows. Development of the site will not result in storm water runoff in excess of current conditions. The existing 5,000 square feet of permeable surface area surrounding the Glendon Manor apartment building will be replaced with the Project's landscaped buffer on its Tiverton side, which is approximately the same size. Implementation of BMPs that address drainage design considerations for the Proposed Project will reduce flows by diverting runoff into landscaped areas, and away from paved surfaces. The use of permeable ground surfaces and grading of landscaped areas to retain water will help minimize the amount of runoff.

Further, to reduce the surge of runoff entering the storm drain system at the start of a storm, and to improve runoff water quality by slowing and filtering the flow, projects are required to implement storm water BMPs that retain or treat the runoff from a storm event producing 3/4 inch of rainfall in a 24-hour period. The Project runoff collection and conveyance system will be designed to accommodate this requirement. No significant impact is anticipated, and the mandatory compliance with these requirements is considered to be a part of the Project design program.

Mitigation Measures

Mandatory NPDES requirements must be incorporated into the Project. These design features are listed below for clarification.

1. The Project shall comply with NPDES requirements for a storm water drain permit along with the preparation of a Storm Water Pollution Prevention Plan (SWPPP), Standard Urban Stormwater Mitigation Plan (SUSMP), approved by the Los Angeles Regional Water Quality Act and other applicable filings prior to construction.
2. The Project Applicant will be required to implement storm water BMPs to retain the runoff from a storm event that produces 3/4 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the Development BMP Handbook, Part B, and Planning Activities. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
3. The on-site drainage system shall be designed to assimilate the existing on-site tributary area of each of the three catch basins: 1) at the southeast corner of Weyburn Avenue and Glendon Avenue, 2) on the west side of Tiverton at Lindbrook and the east side of Glendon at Lindbrook, and 3) on Kinross at Westwood Boulevard.
4. All site drainage shall be collected and transferred to the street in non-erosive drainage devices.
5. 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.
6. Store trash dumpsters either under cover and with drains routed to the sanitary sewer or use non-leaking and water tight dumpsters with lids. Wash containers in an area with properly connected sanitary sewer.
7. Drainage shall not be allowed to pond anywhere on the site, and especially not against any foundation or retaining wall.
8. Drainage shall not be allowed to flow uncontrolled over any descending slope.
9. The Applicant and/or developer shall implement routine safety precautions for handling and storing toxic and hazardous construction materials to mitigate the potential pollution of storm water by these materials. These same types of common sense, "good housekeeping" procedures shall be extended to non-hazardous storm water pollutants such as sawdust and other solid wastes.
10. Cleaning of oily vents and equipment to 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 replaced regularly according to manufacturer’s specifications.
11. 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.

12. The owner(s) of the property will prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department 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.

Significant Project Impacts After Mitigation

No significant impacts with regard to storm water are anticipated to result from development and operation of the Proposed Project.

Cumulative Impacts

Development of projects included in the cumulative project list will not contribute additional runoff to the existing storm drainage system. Many of the properties are currently covered with impermeable surfaces, conveying almost all runoff into the storm drains. Where additional impacts would occur, these will be assessed for environmental impacts, and analysis and mitigation measures will be required, where appropriate. The cumulative increase in runoff from these projects is considered minimal and is not anticipated to cause downstream flooding or significantly affect stormwater drainage system capacity. In addition, the cumulative projects would replace older buildings that may be in violation of NPDES standards, with new structures that would be required to comply with NPDES storm water quality discharge requirements. Therefore, development of projects in the cumulative project list could result in lower flows and less polluted runoff. No significant cumulative impact would occur.

Water Supply

Project Impacts

On November 14, 2000, the City of Los Angeles Bureau of Sanitation prepared a Sewer Availability Report of water consumption rates for land uses included in the Proposed Project. (For projects in the City of Los Angeles, it is assumed that generation rates for waste water are equal to water consumption rates.) Based on generation rates within this report, water consumption from the Proposed Project would require 68,500 GPD. Water usage allocated to development on-site at the time of the NOP would be approximately 11,680 GPD, resulting in a net Project increase in water consumption of 56,820 GPD. The net increase in water consumption would not result in a significant impact on water supply or infrastructure providing water for potable uses. However, infrastructure in the area of the Proposed Project is not adequate to provide required fire flows as determined by the Los Angeles Fire Department (LAFD). The deficient infrastructure capacity for the Westwood Village area is a result of the cumulative impact of existing projects in this developed urban area, and the Proposed Project would not be the sole cause of impact. To obtain adequate fire flows, infrastructure enlargement would be necessary, a main would need to be replaced and an increase in the capacity of an existing pressure regulator station would be required. The six-inch line running through Weyburn Avenue would need to be increased to an eight-inch line between Glendon and Tiverton, and a new private eight-inch waterline would be provided within Glendon Avenue for fire hydrant connections. Therefore, the Applicant of the Proposed Project would be responsible for a fair share portion of the cost to replace the water main in Wilshire Boulevard and enlarging the pressure regulator station. With the expansion of existing infrastructure to meet the needs of the Proposed Project and other projects in Westwood Village, the LAFD would attain the required fire flows and the LADWP would be able to provide water service in accordance with the Department's Rules and Regulations.

As part of the parking component of the Proposed Project, the Applicant is seeking a revocable encroachment permit and subsurface vacation under Glendon Avenue. The LADWP has already capped all of their utilities that lie within Glendon Avenue. Construction activities would not disrupt the provision of water services during the construction of the underground facilities, and would therefore not result in a significant impact on water services.

Mitigation Measures

Although Project impacts are less than significant, the following mitigation measures are included to further reduce impacts.

1. 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. If feasible, sprinkler systems with rain sensors will be utilized to avoid automatic watering during rains.
2. Where possible, reclaimed water shall be used to irrigate landscaped areas.
3. 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.
4. The Proposed Project shall use lower-volume water faucets and water saving showerheads in all construction.
5. The Proposed Project shall use plumbing fixtures that reduce potential water loss from leakage due to excessive wear of washers.
6. Prior to obtaining building permits for the Proposed Project, the Applicant shall be responsible for fees imposed by the City's Building and Safety Department for improvements to water infrastructure necessitated by the Proposed Project. A percentage of the building permit fees will be contributed to the Fire Hydrant Fund, which pools funds for Citywide fire protection facilities improvements.
7. The Applicant shall be responsible for a fair share portion of the cost to replace the water main in Wilshire Boulevard to enlarge the pressure regulator station.
8. 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.
9. The Applicant shall comply with any additional mandatory water use restrictions imposed as required by the City of Los Angeles.

Significant Project Impacts After Mitigation

Project impacts are not significant.

Cumulative Impact

Implementation of all projects within the related project list would result in the consumption of approximately 823,279 GPD. The addition of the Proposed Project would bring the daily water consumption to 880,099 GPD. According to the LAFD, buildout of the Westwood Village area has generated a cumulative impact on water infrastructure for the provision of adequate fire flow. 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.

Solid Waste

Project Impacts

Construction Impacts

The Proposed Project would generate solid waste during the construction phase and the operational phase. During the construction phase, existing structures would be demolished to make room for the Proposed Project and approximately 330,000 cubic yards of material would be excavated for the foundation of the proposed building and underground parking. Materials removed from the Project site would be used as fill for other projects in the area or disposed of at a landfill. The Applicant will implement recycling practices during the construction phase of the Project to decrease the amount of solid waste sent to area landfills. Further, the impact during construction is temporary, and will 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 will generate an adverse, but less than significant impact on solid waste facilities.

Operational Impacts

Based on generation rates provided by the Los Angeles Bureau of Sanitation, the Proposed Project would generate solid waste at a rate of approximately 4,090 pounds per day (PPD). The Proposed Project would have a net increase of 3,393 PPD after subtracting the amount of waste from the solid waste that would have been generated by development on site at the tie of the NOP. The net contribution of solid waste from the Proposed Project represents 0.033 percent of all solid waste generated in the City of Los Angeles. It is anticipated that there would be adequate landfill capacity to serve the Project, and the Project would therefore not result in a significant impact.

Because the receiving landfill is not known, it is premature to perform an analysis of specific landfill capacity. However, substantial capacity still exists at area landfills. In addition, applications are made periodically for the expansion of existing landfills and the creation of new ones. The Bureau of Engineering continually plans (through the City Solid Waste Management Plan, or CiSWMP) 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 phase are not significant using City thresholds, the following mitigation measures shall be implemented to further reduce impacts associated with short-term demolition and construction operations:

1. 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.
2. The Project Applicant shall institute an on-site recycling/conservation program that will include but not be limited to the following components:
3. The Applicant shall institute a Tenant Recycling Program by distributing individual containers to tenants and employees to separate recyclable materials and deposit them into larger containers to be removed by a recycling company.
4. Further recycling activities through education of source reduction methods shall be promoted (i.e. using recycled paper, double siding reports, re-usable cups, etc.)
5. The Project Applicant shall provide residential tenants with individual bins for separating recyclable materials, and provide access to a central recycling facility or storage bin.

Significant Project Impacts After Mitigation

Both construction and operational impacts will be less than significant before mitigation.

Cumulative Impact

The related projects would generate an estimated 39,688 PPD of solid waste. Build-out of the Proposed Project would increase this amount to 43,081 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. On-going long range planning would continue to plan for the regions solid waste needs.

Electricity

Project Impacts

Operation of the Proposed Project would contribute an estimated total annual energy consumption of approximately 4,036,025 kWh. With current levels of impact at approximately 1,236,103 kWh, development of the Proposed Project would result in a net increase of 2,799,922 kWh on an annual basis. The Los Angeles Department of Water and Power (LADWP) has reviewed the Proposed Project's load estimates and determined that no service problems are anticipated as a result of Project implementation. The existing 34.5 kV distribution system currently serving the subject property will be adequate to serve the demands of the Proposed Project. Although energy suppliers have recently faced a shortage of energy supply, the LADWP has not faced the same problems. According to LADWP, the Proposed Project will require a new below-grade substation housing a total of four transformers. The transformers will serve commercial uses with 6,000 amps at 277/480-volt 3-phase power, and residential uses with 6,000 amps at 208/120-volt 3-phase power. The Proposed Project would result in an incremental increase to the local and regional demand for electrical service. The increased demand is anticipated to result in a less than significant adverse impact on electrical resources.

Mitigation Measures

The Proposed Project would result in a less than significant impact on energy resources. Nevertheless, the following mitigation measures in some cases clarify standard requirements and in others serve to further reduce electrical demand:

1. The Proposed Project shall comply with the requirements set forth in Title 24 of the California Code of Regulations.
2. The Project Applicant shall consult with the LADWP regarding the implementation of energy conservation measures including:

    - Built-in appliances, refrigerators, and space conditioning equipment should 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 shall be used.
    - Thermal energy shall be used to handle cooling loads.
    - Ventilation air shall be circulated from high-priority to low-priority areas before being exhausted, thereby decreasing the volume of ventilation air required.
    - Lighting system heat for space heating during cool weather shall be recycled. Lighting system heat shall be exhausted from the buildings through ceiling plenums to reduce cooling loads.

- Low and medium static pressure terminal units and ductwork shall be installed to reduce energy consumption by the air-distribution system.
- Buildings shall be well sealed to prevent outside air infiltrating and to increase interior space conditioning loads.
- Building entrances shall be designed with vestibules to restrict infiltration of unconditioned air and exhausting conditioned air.
- Performance checks shall be conducted on 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.
- Exterior walls shall be finished with light colored materials and high emissivity characteristics to reduce cooling loads. Interior walls shall be finished with light colored materials to reflect more light and increase lighting efficiency.
- Thermal insulation shall be installed in walls and ceilings, which exceeds requirements, established by the California Code of Regulations.
- Window systems shall be designed to reduce thermal gain and loss, thus reducing cooling loads during warm weather and heating loads during cool weather.
- Install heat reflective draperies on appropriate exposures.
- Install fluorescent and high intensity discharge (HID) lamps, which give the highest light output per watt of electricity consumed wherever possible, including exterior fixtures.
- Install time-controlled interior and exterior public area lighting limited to that necessary for safety and security.
- Control HVAC and lighting mechanical systems with timing systems to prevent accidental or inappropriate conditioning or lighting of unoccupied areas.
- Incorporate windowless walls or passive solar inset of windows into the Project for appropriate exposures.

3. Design the Project to focus pedestrian activity within sheltered outdoor areas.

Significant Project Impacts After Mitigation

The Proposed Project would result in a less than significant adverse impact on electrical resources. Implementation of the mitigation measures set forth in this section would further reduce impacts and conserve energy. The impact would be less than significant before and after mitigation.

Cumulative Impacts

Implementation of all projects within the related project list would result in the consumption of approximately 57,834,080 per year. The addition of the Proposed Project would bring the daily energy consumption to 60,634,002. The additional electrical load imposed by the Proposed Project and the related project list is within the capacity of the LADWP. All projects included under the related project list would be required to incorporate energy conservation measures into their design and function. Therefore, cumulative impacts on the provision of electrical services are anticipated to be less than significant.

C. AREAS OF KNOWN CONTROVERSY AND ISSUES TO BE RESOLVED, INCLUDING THE CHOICE AMONG ALTERNATIVES

CEQA requires a discussion of areas of known controversy and issues to be resolved, including the choice among alternatives. In addition to the summary of issues above, areas of known controversy are summarized as follows:

- **Cultural Resources** – The Project involves the removal of the Glendon Manor Apartment Building at 1070 Glendon Avenue. The building has been determined to be eligible for listing by the State Historic Resources Commission. Controversy exists as to whether the building is a significant cultural resource that should be preserved. A discussion of this issue is included in Section V.C., Cultural Resources, of this Draft EIR.
- **Glendon Avenue and Tiverton Avenue** – The Project proposes to widen the sidewalks along Glendon Avenue to make them more pedestrian friendly and provide room for outdoor patio dining. As a result, questions have arisen regarding the effect of narrowing the street and removing approximately 29 street parking spaces. With regard to the removal of street parking, replacement parking is discussed in Section V.J, Transportation/Traffic, Parking; and noise from outdoor dining areas is discussed in Section V.G., Noise of this Draft EIR. Comments have also been received raising concerns about the temporary closure of Glendon Avenue during construction. The short-term street closure is discussed in Section V.J., Transportation/Traffic, Construction Phase,; and emergency access is discussed in Section V.I., Public Services, Fire Protection, of this Draft EIR. The Applicant also requests the redesignation of Tiverton Avenue from a Secondary Highway to a Collector Street; questions have been raised regarding the significance of this redesignation. The redesignation of Tiverton Avenue is discussed in Section V.F., Land Use, of this Draft EIR.
- **Glendon Avenue Subsurface Street Vacation** – The proposed project is located on two parcels, separated by Glendon Avenue. Parking for the Project will be located on three subterranean parking levels extending under Glendon Avenue from the east side of the street to the west side of the street. To connect the site across Glendon Avenue, the Application has requested a vacation of the subterranean area below the public street right-of-way. Questions have been raised regarding replacement and relocation of utilities, engineering standards for the depth of the vacation and replacement of the roadway, procedures for perfecting the timing of the vacation request, and the easement rights of the private property owners within the subdivision. Any private easements held by such owners do not extend to Glendon Avenue's subsurface, because those easements run only on the surface of the street, not under it. See Section V.L. of this Draft EIR, Subsurface Vacation of Glendon Avenue. In addition, the Draft EIR discusses several construction related impacts: short-term air quality impacts resulting from the excavation are discussed in Section V.B., Air Quality, Construction Phase Impacts; liquefaction, settlement, and soil stabilization issues are discussed in Section V.D., Geology, Project Impacts; groundwater discharge resulting from the excavation are discussed in Section V.E., Hazardous Materials, Groundwater; noise impacts resulting from the excavation are discussed in Section V.G., Noise, Construction Phase Impacts; site hydrology and impacts to utility systems are discussed in Section V.K.1 Wastewater; and V.K.2 Stormwater of this Draft EIR. The Bureau of Engineering requires the filing a tract map for the proposed subsurface vacation. Engineering standards for the replacement of the roadway are on file at the City of Los Angeles, Bureau of Engineering, and LADOT.
- **Transportation, Traffic and Parking** – Questions exist as to whether the traffic impacts are significant and whether they will be adequately mitigated. Additionally, some commentators have asked how the parking requirements were calculated, whether there will be sufficient parking to satisfy the Specific Plan's parking requirement, and whether the bicycle parking

provided is sufficient. Generalized questions about transportation issues have also arisen, such as congestion on local streets and at specific intersections. A discussion of these issues is included in Section V. J, Transportation/Traffic of this Draft EIR.

- **Specific Plan EIR vs. Project EIR** – The Applicant is requesting a number of amendments to the Westwood Village Specific Plan. Community groups and homeowner's associations have requested an update to the Westwood Village Specific Plan, rather than a project EIR. The requested amendments are site-specific, and therefore, the scope of the EIR does not include potential impacts resulting from all reasonably foreseeable projects within the entire Westwood Village geographic area. The procedure for updating the Westwood Village Specific Plan is beyond the purview of the Applicant's requests and this EIR. The requested Specific Plan amendments are discussed in Section V.F., Land Use of this Draft EIR.
- **Density Bonus, Permitted Floor Area, Building Configuration, and Project Height** – The following areas of controversy will be addressed by the decision maker. The Applicant is requesting a number of discretionary actions, including Specific Plan Amendments. Questions exist with regard to these amendments, including their effect on the calculation of permitted floor area and density bonus; whether mixed-use planning standards should be incorporated into the Specific Plan; and whether the building height provisions should be changed, as proposed. The Westwood Village Specific Plan currently permits building heights varying from 45 feet to 64 feet. With the Proposed Project amendment, the Proposed Project buildings (including roofs, roof structures and parapet walls) will be no higher than 65 feet from the highest point of the roof to the elevation of the ground surface below that point of measurement. The Proposed Project amendment also specifies that building excluding roof and roof structures shall be no more than 55 feet as measured from the top of the habitable space of the ground surface below that point of measurement. As permitted in the Specific Plan, unoccupied towers would be permitted to 40 feet above the building height at corners and 20 feet above the building height elsewhere. The highest point of the building relative to the ground surface below is 70 feet; this height occurs at an unoccupied tower. Because of the significant slope of the Project site (up to 19 feet at some points), the highest point of the building relative to grade (the lowest point of the site) is 82 feet. Concerns were also raised regarding the applicable design guidelines, (including setbacks, roof and facade articulations, and aesthetics). A discussion of the potential impacts to land use compatibility and consistency is included in Section V.F., Land Use of this Draft EIR. This section includes a detailed discussion of building height and the proposed Specific Plan Amendments. Specifically, a discussion of the proposed amendments is included in Table V.F-1, Proposed Specific Plan Amendments, of this Draft EIR. A discussion of the potential aesthetic impacts that would result from the proposed building height is included in Section V.A.1, Visual Qualities; and Section V.A.3, Shading, of this Draft EIR. Section VI. of this EIR examines an alternatives that is consistent with the existing Specific Plan.

The summary of Project impacts, above, identifies issues to be resolved and whether or how to mitigate significant effects. In addition, this EIR includes an alternatives analysis. As described further in Section VI., Alternatives, numerous alternatives were entertained and five, including the "No Project Alternative," were evaluated as described below. The impacts of these alternatives in comparison to those of the Project are summarized in **Table II-3**.

1. No Project Alternative. This alternative assumes that no changes to the site occur. The existing structures would remain, and their current condition would be unchanged. As the vacant buildings could be reoccupied, analysis of this alternative will also include an assessment of the impact of the site reoccupied, but otherwise unchanged. However, since the NOP, the 29,400-sq. ft. commercial

INSERT - Table II-3 – Alternatives Impact Comparison Summary

structure has been demolished. Therefore, this alternative does not include this commercial space in its impact assessment. This alternative considers impacts associated with the existing 12,000 sq. ft. (652 seats) movie theater; the 42-unit, 27,040-sq. ft. Glendon Manor apartment building, and a parking lot. Total development floor space would be 39,040 sq. ft., for an FAR of 0.21:1. This alternative satisfies a direct requirement in CEQA for a No Project Alternative.

2. No Specific Plan Amendment/Mixed Use. This alternative is comprised of 231 residential units accounting for 319,035 sq.ft. of development, 157,700 sq. ft. of retail space, 17,755 sq. ft. (652 seats) movie theater, 25,000 sq. ft. of restaurant space, and 9,000 sq. ft. of public areas. This alternative would have an FAR of 2.85:1. The proposal would require no amendment to the Westwood Village Specific Plan. This alternative was selected for two primary reasons: (1) it requires no amendments to the Specific Plan; and (2) it responds to public comments in the NOP. Alternative Two is feasible because the Specific Plan allows outright development of 231 residential units on the proposed site without a Specific Plan amendment. Since no increase in the overall allowable FAR is proposed as a result of this amendment, the increase in residential use is effectively a transfer of floor area from commercial uses otherwise allowed on the site.

The analysis of this alternative is useful to the decision-maker to compare traffic impacts resulting from various uses on the project site, and to analyze how transferring density from commercial uses to less intense traffic generators, such as residential, may reduce impacts. No other residential variations were considered economically feasible because 231 residential units are permitted outright under the Specific Plan.

3. Retain and Re-Use Glendon Manor as a Hotel/Mixed-Use Alternative. Alternative Three would retain the 27,040 sq. ft. Glendon Manor apartment building and re-use it as a hotel, construct 88,000 sq. ft. of retail commercial space, 15,000 sq. ft. of restaurant space, 8,068 sq. ft of public areas and add 328 new apartment units (379,265 sq. ft. of apartment floor area) the total amount of new development would be 490,333 sq. ft. constructed entirely on the portion of the site that does not contain Glendon Manor. FAR for these areas would be 2.85:1. This alternative retains a mixed-use concept, similar to that of the Proposed Project, for the remaining lot area outside of the Glendon Manor.

This alternative includes a re-use analysis of the existing apartment building as a hotel, which is permitted outright under the use provisions of the Specific Plan. This scenario satisfies the CEQA requirement to provide an alternative to avoid the significant impact of removing Glendon Manor, which is eligible for listing as an historic resource. No other re-use alternatives were considered reasonably feasible because, given the configuration of the building, no other uses permitted under the Specific Plan can be reasonably incorporated into the building.

4. Hotel Tower Alternative. The fourth alternative consists of a 350-room hotel (295,616 sq. ft.); a 652-seat movie theater (17,755 sq. ft.), 215,119 sq. ft. of commercial space (retail/restaurant and office). This proposal currently would be allowed under the Westwood Village Specific Plan and would require no amendment. The FAR would be 2.85:1. As with the Proposed Project, Glendon Manor would be removed.

This alternative was selected to respond to the Proposed Project's potential impacts on the Specific Plan and because a similar project was approved by the City Council in 1991. That previous project, commonly referred to as the Nansay Hotel project, EIR No. 89-825-SUB(CUB)(VAC), October 1991, included a hotel, a move theater, office and commercial use, condominium units, restaurants and retail space. The analysis of this alternative is useful in comparing traffic and land use (i.e. height and building intensity) impacts resulting from various uses on the Project site; additionally, the

alternative analyzes how transferring density between hotel and residential uses may reduce those impacts. No other hotel variations were considered feasible because the hotel tower alternative is based on a certified EIR and approvals granted for the same project site.

5. Retail Shopping and Entertainment Alternative. This includes 219,000 sq. ft. of neighborhood retail, 3,400 theater seats (75,000 sq. ft.), 26,000 square feet of restaurant space, 164 senior housing units (132,000 sq. ft.) and 17,250 sq. ft. of public areas. The FAR would be 2.08:1. The proposal would require amendment of the Westwood Village Specific Plan. This alternative responds to community questions regarding how the Proposed Project compares with the Village Center Westwood proposal for the site (96-0075-SUB(CUB)(SPA)). Alternative Five is a feasible alternative that maximizes the economic value of the Project site. It is noted that the City recently denied approval of the Village Center Westwood proposal (prior to printing of this document). However, its use as an alternative is helpful in providing a comparison to a previous proposal for the site.

Of the alternatives evaluated, the No Project alternative is the environmentally superior alternative, as it would reduce the greatest number of adverse impacts. Among the remaining alternatives, the Re-Use Glendon Manor as a Hotel/Mixed-Use Alternative (Alternative Three) would be the environmentally superior alternative, as it would reduce the greatest number of adverse impacts, including elimination of the significant unmitigatable impact to cultural resources. However, the Proposed Project is the selected alternative because it would most greatly satisfy the stated Project objectives. Project mitigation measures (listed in each analysis section of this EIR) will reduce the Proposed Project impacts wherever possible.

D. NOP COMMENT LETTER SUMMARY CHART

Letters of comment were received in response to the Notice of Preparation (NOP) for this EIR. These letters are included in Appendix A of this EIR. The chart on the following page summarizes the NOP comment letters and the issues raised in those letters.

INSERT - Table II-4 Summary Matrix of Issues Raised in NOP Comment Letters
Page 1 of 1– (EXCEL TABLE)