I. INTRODUCTION/SUMMARY

A. INTRODUCTION

The subject of this Draft Environmental Impact Report (EIR) is the proposed development of a 21-story condominium building containing 35 units ("proposed project"). The project site is located at 10250 Wilshire Boulevard within the Westwood Community Planning Area of the City of Los Angeles. The project applicant is Fifield Realty Corp., located at 2020 Main Street, Suite 610, Irvine, CA, 92614. A description of the proposed project is contained in Section III (Project Description).

Because the proposed project will require approval of certain discretionary actions by the City of Los Angeles and/or other governmental agencies, the proposed project is subject to the California Environmental Quality Act (CEQA), for which the City is the designated Lead Agency. The City of Los Angeles Department of City Planning administers the process by which environmental documents for private projects are prepared and reviewed by the City pursuant to the applicable provisions of the City Municipal Code and the State CEQA Guidelines. This EIR was voluntarily prepared based on the conclusions of a prior CEQA study. Furthermore, as the City has already approved the tract map for the proposed project, this EIR has been submitted to address issues raised by the community.

As described in Section 15121 (a) and 15362 of the CEQA Guidelines, an EIR is an informational document which will inform public agency decision makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The purpose of this Draft EIR, therefore, is to focus the discussion on those potential effects on the environment of the proposed project which the lead agency has determined may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce insignificant environmental impacts or avoid significant environmental impacts.

This Draft EIR was prepared in accordance with Section 15151 of the CEQA Guidelines which defines the standards for EIR adequacy:

> "An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently take account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have

looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure."

Notice of Preparation

Comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, were solicited through a Notice of Preparation (NOP) process. The NOP for the Draft EIR was circulated for a 30-day review period starting on September 9 and ending on October 8. Refer to Appendix B of this Draft EIR for a copy of the NOP and written comments submitted to the City of Los Angeles in response to the NOP.

Environmental Issues to be Analyzed in Draft EIR

Based on a review of environmental issues by the City of Los Angeles Department of City Planning, this Draft EIR analyzes the following environmental impact areas:

- Aesthetics
- Air Quality
- Geology and Soils
- Hydrology
- Land Use
- Noise
- Transportation/Traffic

Section IV.A of this report lists the environmental issues that were determined not to be significantly affected by the proposed project, and therefore are not analyzed in detail in this Draft EIR.

Environmental Review Process

The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for 45 days. Public hearings on the proposed project will be held after the review period and the preparation of the Final EIR. Notice of time and location will be published prior to the public hearing date. All comments or questions about the Draft EIR should be addressed to:

Nicholas Hendricks
Environmental Review Coordinator
Environmental Review Section
200 North Spring Street, Room 763
Los Angeles, CA 90012-2601
(213) 978-1355

Following public review of the Draft EIR, a Final EIR will be prepared in response to comments received during the public review period. The Final EIR will be available for public review prior to its certification by the City of Los Angeles.

Organization of Draft EIR

This Draft EIR is organized into eight sections, as follows:

Section I. Introduction/Summary: This section provides an introduction to the environmental review process per CEQA, a summary of the proposed project description, areas of controversy, issues to be resolved, alternatives to the proposed project, and environmental impacts and mitigation measures.

Section II. Environmental Setting: An overview of the study area's environmental setting is provided including a description of existing and surrounding land uses, and a list of related projects proposed in the project area.

Section III. Project Description: This section provides a complete detailed description of the proposed project including the project location, objectives, characteristics, and required discretionary actions.

Section IV. Environmental Impact Analysis: Section IV.A. lists those environmental issues that the Initial Study determined would not to be significantly affected by the proposed project. Therefore those impacts have not been further analyzed in this Draft EIR. Sections IV.B. through IV.H. are the focus of this Draft EIR. Each environmental issue contains a discussion of existing conditions for the project area, an assessment and discussion of the significance of impacts associated with the proposed project, proposed mitigation measures, cumulative impacts, and level of impact significance after mitigation.

Section V. General Impact Categories: This section provides a summary of any significant and unavoidable impacts and a discussion of the potential growth inducement of the proposed project.

Section VI. Alternatives to the Proposed Project: This section includes an analysis of a reasonable range of alternatives to the proposed project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the project and that would avoid or substantially lessen any of the significant effects of the project.

Section VII. Preparers of the EIR and Persons Consulted: This section presents a list of City and other agencies and consultant team members that contributed to the preparation of the Draft EIR.

B. PROPOSED PROJECT

The project applicant proposes to develop the project site with no more than 35 condominium units (with accessory housekeeping space) pursuant to a previous Tentative Tract Map (TTM) approval granted in 1979 and recorded on October 31, 1979. The 202,616 square foot high-rise residential building would be 21 stories in height or approximately 301 feet tall. Parking would be provided on-site for approximately 103 vehicles in a three level subterranean parking structure. Total grading would consist of approximately 38,600 cubic yards of soil. The proposed project would be consistent with the existing [Q]R5-3 zoning for the project site.

C. AREAS OF CONTROVERSY

Concerns raised in letters submitted to the Department of City Planning in response to the NOP include the following:

CEQA Process

Concerns were raised regarding the holding of a scoping meeting and full analysis of all environmental issues.

Aesthetics

Concerns were raised regarding shade and shadow, building height, building mass, and inadequate property setbacks.

Air Quality

Concerns were raised regarding comprehensive air quality analysis with emphasis on construction-related sources, toxic stationary sources, and vehicle emissions.

Biological Resources

Concerns were raised regarding the effects of aquifer rerouting on animal and plant communities.

Cultural Resources

Concerns were raised regarding the contacting of the Native American Information Center for a records search, confidentiality of site location information, timeliness of report submittal, contacting the Native

American Heritage Commission for a Sacred Lands File Check and for consultation, and inclusion of mitigation measures addressing the potential for accidental discovery of human remains.

Geology and Soils

Concerns were raised regarding potential for liquefaction, proximity to a fault line, subsidence of homes in the vicinity of the project site, and avoidance of catastrophic events related to ground failure.

Hazards and Hazardous Materials

Concerns were raised regarding health issues related to stagnant water.

Hydrology and Drainage

Concerns were raised regarding the effects of rerouted drainage and aquifer capacity on properties adjacent to the project site, provision and adequacy of storm drains, potential to restore the aquifer to its pre-construction state after construction, potential impacts to the adjacent Stone Canyon-Hollywood water line, and potential safety issues related to a 100-year storm.

Land Use

Concerns were raised regarding consistency with the adopted general plan and zoning for the project site, conformity with the Wilshire-Westwood Scenic Corridor Specific Plan, adverse effects on a community of single-family homes, and the adequacy of prior property entitlements.

Noise

Concerns were raised regarding construction noise and utility vehicle noise.

Public Services

Concerns were raised regarding emergency vehicle access, safety issues related to construction traffic, and building design and landscaping as they relate to security.

Recreation and Parks

Concerns were raised regarding the provision of recreational space on- and off-site.

Transportation

Concerns were raised regarding general traffic issues, as well as specific impacts related to increased traffic on SR-405, increased AM and PM peak hour traffic volumes, levels of service (LOS) before and

after development, future conditions with cumulative analysis (particularly in relation to the Santa Monica Boulevard project), sharing of mitigation cost, provision of on-site employee parking, street closure issues, retiming of the Wilshire/Comstock intersection, restricting commuter traffic on neighborhood streets, garbage truck routing, and proposed project access and egress driveway locations.

D. ISSUES TO BE RESOLVED

Issues to be resolved include whether or how to mitigate potentially significant environmental impacts related to the proposed project, and whether one of the alternatives should be approved rather than the proposed project.

E. ALTERNATIVES

This Draft EIR considers a range of alternatives to the proposed project to provide informed decision-making in accordance with Section 151216(f) of the CEQA Guidelines. The alternatives analyzed in Section VI, Alternatives to the Proposed Project of this Draft EIR include:

Alternative A: No Project Alternative

Under Alternative A, the proposed project would not be constructed and the project site would remain in its current condition.

Alternative B: Reduced Density Alternative

Under Alternative B, the proposed project would be reduced by 25%, reducing the number of units from 35 to 26 and the total floor area from 202,616 to 151,962 square feet. This alternative would result in a building height approximately 70 feet shorter than that provided under the proposed project, and would provide parking in 2.5 subterranean parking levels. This reduction would result in the development of fewer units than have been entitled for the project site.

Alternative C: Wilshire-Westwood Scenic Corridor Specific Plan Consistency Alternative

Under Alternative C, the proposed project would be compatible with the applicable guidelines set forth in the Wilshire-Westwood Scenic Corridor Specific Plan. The proposed building would be six stories in height and would provide 57 condominiums and 143 subterranean parking spaces. This would result in an approximately 38% increase in the number of units and a 40 % increase in the number of parking spaces compared with those provided under the proposed project.

F. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

The following pages summarize the various environmental impacts associated with the construction and operation of the proposed project. Mitigation measures are proposed for significant environmental impacts, and the level of impact significance after mitigation is also identified.

Aesthetics

Impacts

Public Views

The proposed project would not result in the obstruction of any public scenic views. (Private views are not considered to be impacted if an adjacent land use blocks such view, specifically if the project is within the zoning and design guidelines designated for the site.) Therefore, impacts relative to public scenic views would be less than significant.

Compatibility with Surrounding Land Uses

The proposed project is considered to be visually compatible with the surrounding land uses fronting Wilshire Boulevard as there are additional high-rise buildings in the area. Furthermore, the project design is consistent with the permitted density and building height for the site, and voluntarily conforms to several provisions of the Corridor Specific Plan although the proposed project is exempt from the provisions of the Plan. In addition, the design would be subject to review and approval by the Design Review Board. Therefore, visual compatibility impacts would be less than significant.

Lighting

The majority of the proposed project's lighting features would be directed towards the interior of the site and away from neighboring land uses. Light and glare impacts would be potentially significant but can be mitigated to less than significant levels by implementing the proposed light and glare mitigation measures below.

Shade/Shadow

The December shadows, which are the longest shadows of the year, would partially shade one of the high-rise multi-family residential buildings located northwest of the project site until approximately 9:30 A.M. On the north and south sides of Wilshire Boulevard, the Los Angeles Country Club and its associated uses are shaded for more than two hours. However, the Los Angeles Country Club is not a residential use. Therefore, as the proposed project would not cast December shadows on adjacent residential uses for two or more hours between the hours of 9:00 A.M. and 3:00 P.M., which would be

considered an impact per the Westwood Community Design Review Board Specific Plan guidelines, shade/shadow impacts would be less than significant.

Mitigation Measures

The following mitigation measures are required to ensure the proposed project would not result in any significant impacts associated with lighting and glare:

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

2. Outdoor lighting shall be directed on-site and designed and installed with shielding so that the light source can not be seen from adjacent land uses.

3. The exterior of the proposed buildings shall be constructed of non-reflective building materials.

Level of Significance after Mitigation

With the implementation of the above mitigation measures, impacts associated with lighting and glare would be less than significant.

Air Quality

Impacts

Federal, State, or Regional Standards

Construction emissions from the proposed project would not exceed SCAQMD significance thresholds during the construction phase. Furthermore, as the proposed project is consistent with the General Plan, which incorporates SCAG projections for the region, the proposed project is consistent with the Air Quality Management Plan. Implementation of the proposed project would not exceed federal, state or regional standards or thresholds, or substantially contribute to an existing or projected air quality violation. Impacts would be less than significant. The project is planned in a way that would minimize Vehicle Miles Traveled (VMT) both within the community by providing housing for primarily local residents with easy access to local businesses. Therefore, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan and impacts would be less than significant.

Cumulative Impacts to Criteria Pollutants in Non-Attainment

The proposed project would generate daily emissions of ROG, NOx, CO, SOx and PM10 which would not exceed the thresholds of significance recommended by the SCAQMD. Therefore, implementation of the proposed project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard and impacts would be less than significant.

Sensitive Receptors

The SCAQMD recognizes CO as a localized problem requiring additional analysis when a project is likely to subject sensitive receptors to CO hotspots. Future CO concentrations near intersections in the vicinity of the project site would not exceed federal or state ambient air quality standards. Therefore, CO hotspots in the vicinity of the project site would not have the potential to endanger sensitive receptors in the future, and the contribution of project traffic-related CO at these intersections would be less than significant

Objectionable Odors

As the proposed project would not involve any strong-smelling elements, implementation of the proposed project would not expose sensitive receptors to objectionable odors and impacts would be less than significant.

Mitigation Measures

Because impacts related to the implementation of the proposed project would be less than significant, no mitigation measures are required.

Level of Significance after Mitigation

Project impacts associated would be less than significant.

Geology and Soils

Impacts

Grading and Construction Considerations

Based on the results of the geotechnical investigation, the geologic materials underlying the project site consist of an interbedded sequence of well-graded sand, silty-sand, silt, silty-clay, and sandy-clay with some gravel to a depth of 100 feet beneath the existing ground surface (bgs). Although these soils are corrosive to ferrous metals and aggressive to copper, they are non-detrimental to portland cement

concrete. Expansive soils could have a significant impact on the proposed development. These impacts would be mitigated to less than significant during the design phase of the proposed project, as discussed in the mitigation measures below.

The total excavation associated with the construction of the proposed project would be approximately 35 to 40 feet. The natural soils at and below the planned level of excavation are generally stiff or dense. Therefore, no significant impacts related to the soil conditions are anticipated due to the excavation of the project site.]

Localized erosion during construction could occur during periods of heavy precipitation. This condition would be mitigated to less than significant during the construction phase of the proposed project, as discussed in the mitigation measures.

Seismic Hazards

The proposed construction would be consistent with all applicable provisions of the City of Los Angeles Building Code, as well as the seismic design criteria contained within the Uniform Building Code. Additional precautions may be taken to protect personal property and reduce the chance of injury including strapping water heaters and securing furniture. It is likely that the project site would be shaken by future earthquakes produced in southern California. However, with the incorporation of mitigation measures listed below, these impacts would be less than significant.

Liquefaction

The potential for liquefaction of the soils underlying the site is considered to be very low. Therefore, liquefaction impacts would be less than significant.

Mitigation Measures

The following mitigation measures are required to reduce geology and soils impacts to less than significant levels:

1. Drainage collection devices shall be designed in conformance with the City of Los Angeles grading and building codes to ensure that all runoff is collected and transferred to the proper collection devices. The applicant shall provide analysis of the drainage volume created by the proposed project. All design of drainage flow, collection, and discharge shall be in conformance with current city codes and subject to approval by the City of Los Angeles. On-site grading shall be performed in accordance with City codes to ensure that erosion of graded areas will not occur. All areas of construction shall be fine-graded to direct runoff to the street or to the nearest available storm drain. No runoff within the property boundaries shall be allowed to flow uncontrolled.

2. Spread footings, if used for support of the proposed building, carried at least 1 foot into the undisturbed stiff or dense natural soils at the planned excavation level, and at least 3 feet below the lowest adjacent grade or floor level can be designed to impose a net dead-plus-live load pressure of up to 8,000 pounds per square foot. The footing excavations shall be deepened as necessary to extend into undisturbed natural soils.

3. The mat-type foundation supporting the entire building established in the undisturbed natural soils shall be designed to impose a net dead-plus-live load soil pressure of up to 5,000 pounds per square foot. The mat shall be sufficiently reinforced and thickened to distribute the imposed loads uniformly across the mat.

4. Footings for minor structures (including auxiliary retaining walls, free-standing walls, and elevator pit walls) that are structurally separate from the proposed building shall be designed to impose a net dead-plus-live load pressure of 1,500 pounds per square foot, at a depth of 2 feet below the adjacent grade. Such footings shall be established in either properly compacted fill and/or undisturbed natural soils.

5. The recommended bearing values are net values, and the weight of concrete in the footings and mat shall be taken as 50 pounds per cubic foot; the weight of soil backfill shall be neglected when determining the downward loads from the structure. A one-third increase in the above bearing values shall be used when considering wind or seismic loads.

6. While the actual bearing value of the compacted fill will depend on the materials used and the compaction methods employed, the quoted bearing value will be applicable if acceptable soils are used and are compacted as recommended. The bearing value of the compacted fill shall be confirmed during grading.

7. As the degree of settlement of the proposed condominium building will depend on the foundation loads imposed, settlement analyses shall be performed when the foundation load information is available. The results of the settlement analyses will be used to confirm or modify the foundation design recommendations presented in this report.

8. To assist in the structural analyses of the mat foundation, a modulus of subgrade reaction (k) of 50 pounds per cubic inch shall be used for the soils underlying the mat foundation. This value was estimated from available data and published empirical relationships.

9. Lateral loads shall be resisted by soil friction and passive resistance against the footings or the mat foundation. A coefficient of friction of 0.5 shall be used between spread footings the floor slab and the mat and the supporting soils. The passive resistance of the

undisturbed natural soils against footings or the mat shall be assumed to be 300 pounds per cubic foot. A one third increase in the passive value shall be used for wind or seismic loads. The passive resistance of the soils and the frictional resistance between the floor slab, footings or the mat and the supporting soils shall be combined without reduction in determining the total lateral resistance.

10. The recommended bearing and lateral load design values for the proposed building are for use with loadings determined by a conventional working stress design. When considering an ultimate design approach, the recommended design values shall be multiplied by the following factors:

Design Item	Ultimate Design Factor
Bearing Value	3.0
Passive Pressure	1.75
Coefficient of Friction	1.25

In no event, however, shall foundation sizes be less than those required for dead-plus-live loads when using the working stress design values.

11. To verify the presence of satisfactory soils at design elevations, all footing or mat excavations shall be observed by personnel of MACTEC. Footings or mat shall be deepened as necessary to reach satisfactory supporting soils. Where foundation excavations are deeper than 4 feet, the sides of the excavations shall be sloped back at 1:1 or shored for safety.

12. Backfill around and over foundations and utility trench backfill within the building area shall be mechanically compacted; flooding shall not be permitted.

13. Inspection of the foundation excavations shall also be required by the appropriate reviewing governmental agencies. The contractor shall be familiar with the inspection requirements of the reviewing agencies.

14. Where there is not sufficient space for sloped embankments, shoring will be required. One method of shoring would consist of steel soldier piles placed in drilled holes, backfilled with concrete, and tied back with earth anchors. Some difficulty shall be encountered in the drilling of the soldier piles and the anchors because of shallow ground water and caving in the sandy and gravelly deposits. Special techniques and measures, as described in Appendix

C (Geotechnical Reports), would be necessary in some areas to permit the proper installation of the soldier piles and the tie back anchors. In addition, if there is not sufficient space to install the tie back anchors to the desired lengths on any side of the excavation, the soldier piles of the shoring system shall be internally braced.

15. For design of cantilevered shoring, a triangular distribution of lateral earth pressure shall be used. It shall be assumed that the retained soils with a level surface behind the cantilevered shoring will exert a lateral pressure equal to that developed by a fluid with a density of 30 pounds per cubic foot. Where retained soils are partially sloped at 1:1 above the shoring, it shall be assumed that the soils will exert lateral pressures equal to 60 pounds per cubic foot.

16. For the design of tied-back or braced shoring, a trapezoidal distribution of earth pressure shall be used. The recommended pressure distribution, for the case where the grade is level behind the shoring, is illustrated in Appendix C (Geotechnical Reports) with the maximum pressure equal to 22H in pounds per square foot, where H is the height of the shoring in feet. Where a combination of sloped embankment and shoring is used, the pressure would be greater and must be determined for each combination. However, where the required soils are sloped at 1:1 above the shoring, it shall be assumed that the soils would exert lateral pressure equal to 44H pounds per cubic foot.

17. The upper 10 feet of shoring adjacent to the streets and vehicular traffic areas shall be designed to resist a uniform lateral pressure of 100 pounds per square foot, acting as a result of an assumed 300 pounds per square foot surcharge behind the shoring due to normal street traffic. If the traffic is kept back at least 10 feet from the shoring, the traffic surcharge shall be neglected. Furthermore, the shoring system shall be designed to support the lateral surcharge pressures imposed by concrete trucks, cranes, and other heavy construction equipment placed near the shoring system.

18. For the design of soldier piles spaced at least two diameters on centers, the allowable lateral bearing value (passive value) of the soils below the level of excavation shall be assumed to be 500 pounds per square foot per foot of depth at the excavated surface, up to a maximum of 5,000 pounds per square foot. To develop the full lateral value, provisions shall be taken to assure firm contact between the soldier piles and the undisturbed soils. The concrete placed in the soldier pile excavations shall be a lean-mix concrete. However, the concrete used in that portion of the soldier pile, which is below the planned excavated level, shall be of sufficient strength to adequately transfer the imposed loads to the surrounding soils.

19. The frictional resistance between the soldier piles and the retained earth shall be used in resisting the downward component of the anchor load. The coefficient of friction between

the soldier piles and the retained earth shall be taken as 0.3. In addition, provided that the portion of the soldier piles below the excavated level is backfilled with structural concrete, the soldier piles below the excavated level shall be used to resist downward loads. For resisting the downward loads, the frictional resistance between the concrete soldier piles and the soils below the excavated level shall be taken equal to 400 pounds per square foot.

20. Continuous lagging will be required between the soldier piles. The soldier piles and anchors shall be designed for the full anticipated lateral pressure. However, the pressure on the lagging will be less due to arching in the soils. The lagging shall be designed for the recommended earth pressure but limited to a maximum value of 400 pounds per square foot.

21. Tie back friction anchors shall be used to resist lateral loads. For design purposes, it shall be assumed that the active wedge adjacent to the shoring is defined by a plane drawn at 35 degrees with the vertical through the bottom of the excavation. The anchors shall extend at least 30 feet beyond the potential active wedge and to a greater length if necessary to develop the desired capacities.

22. The capacities of anchors shall be determined by testing of the initial anchors as outlined in a following section. For design purposes, it is estimated that drilled friction anchors will develop and average friction value of 500 pounds per square foot. Only the frictional resistance developed beyond the active wedge would be effective in resisting lateral loads. If the anchors are spaced at least 6 feet on centers, no reduction in the capacity of the anchors needs to be considered due to group action.

23. The anchors shall be installed at angles of 15 to 40 degrees below the horizontal. Caving of the anchor holes shall be anticipated and provisions made to minimize such caving. The anchors shall be filled with concrete placed by pumping from the tip out, and the concrete shall extend from the tip of the anchor to the active wedge. To minimize chances of caving, the portion of the anchor shaft within the active wedge shall be backfilled with sand before testing the anchor. This portion of the shaft shall be filled tightly and flush with the face of the excavation. The sand backfill shall contain a small amount of cement to allow the sand to be placed by pumping.

24. A MACTEC representative shall select at least two of the initial anchors for 24 hour 200% test, and five additional anchors for quick 200% tests. The purpose of the 200% test is to verify the friction value assumed in design. The anchors shall be tested to develop twice the assumed friction value. Where satisfactory tests are not achieved on the initial anchors, the anchor diameter and/or length shall be increased until satisfactory test results are obtained.

The total deflection during the 24 hour 200% test shall not exceed 12 inches during loading; the anchor deflection shall not exceed 0.75 inch during the 24 hour period, measured after the 200% test load is applied. If the anchor movement after the 200% load has been applied for 12 hours is less than 0.5 inch, and the movement over the previous 4 hours has been less than 0.1 inch, the test shall be terminated.

25. For the quick 200% tests, the 200% test load shall be maintained for 30 minutes. The total deflection of the anchor during the 200% quick test shall not exceed 12 inches; the deflection after the 200% test load has been applied shall not exceed 0.25 inch during the 30 minute period. Where satisfactory tests are not achieved on the initial anchors, the anchor diameter and/or length shall be increased until satisfactory test results are obtained.

26. All of the production anchors shall be pre-tested to at least 150% of the design load; the total deflection during the tests shall not exceed 12 inches. The rate of creep under the 150% test shall not exceed 0.1 inch over a 15 minute period for the anchor to be approved for the design loading.

27. After a satisfactory test, each production anchor shall be locked off at the design load. The locked off load shall be verified by rechecking the load in the anchor. If the locked off load varies by more than 10% from the design load, the load shall be reset until the anchor is locked off within 10% of the design load.

28. The installation of the anchors and the testing of the completed anchors shall be observed by MACTEC.

29. Raker bracing shall be used to internally brace the soldier piles. If used, raker bracing could be supported laterally by temporary concrete footing (deadmen) or by the permanent interior footings. For design of such temporary footings, poured with the bearing surface normal to the rakers inclined at 45 to 60 degrees with the vertical, a bearing value of 4,500 pounds per square foot shall be used, provided the shallowest point of the footing is at least 1 foot below the lowest adjacent grade. To reduce the movement of the shoring, the rakers shall be tightly wedged against the footings and/or shoring system.

30. It is estimated that deflection could be on the order of 1 inch at the top of the shored embankment. If greater deflection occurs during construction, additional bracing shall be provided to minimize settlement of the utilities in the adjacent streets. To reduce the deflection of the shoring, a greater active pressure could be used in the shoring design.

31. The performance of the shoring system shall be monitored. The monitoring shall consist of periodic surveying of the lateral and vertical locations of the tops of all the soldier piles. The precise monitoring program shall be defined when the shoring system design is finalized.

32. Prior to construction, the adjacent existing structure shall be surveyed for horizontal and vertical locations. Also, a careful survey of existing cracks and offsets in any adjacent structure shall be performed and recorded and photographic records made.

33. For design of cantilevered retaining walls, where the surface of the backfill is level, it shall be assumed that the soils would exert a lateral pressure equal to that developed by a fluid with a density of 35 pounds per cubic foot. The subterranean walls shall be designed to resist a trapezoidal distribution of lateral earth pressure. The lateral earth pressure on the permanent subterranean walls would be similar to that recommended for design of temporary shoring except that the maximum lateral pressure would be 24H in pounds per square foot, where H is the height of the walls in feet. The recommended earth pressure assumes that a subdrain system would be installed below the floor slab of the lower subterranean level and behind the subterranean walls, so that external hydrostatic pressure would not be developed, if the ground water rises to the historical depth of 25 feet below the existing grade.

34. In addition, to the recommended earth pressure, the upper 10 feet of walls adjacent to streets and vehicular traffic areas shall be designed to resist a uniform lateral pressure of 120 pounds per square foot, acting as a result of an assumed 350 pounds per square foot surcharge behind the walls due to normal traffic. If the traffic is kept back at least 10 feet from the walls, the traffic surcharge shall be neglected.

35. As discussed in section IV.E. Hydrology, a subdrain system shall be installed so that external water pressure will not be developed against the basement walls. In addition, walls below grade shall be waterproofed.

36. Required soil backfill shall be mechanically compacted, in layers not more than 8 inches thick, to at least 90% of the maximum density obtainable by the ASTM Designation D1557 91 method of compaction. The backfill shall be sufficiently impermeable when compacted to restrict the inflow of surface water. The placement of the upper on-site clay soils as a backfill behind walls below grade shall be avoided. Some settlement of the deep backfill shall be allowed for in planning sidewalks and utility connections.

37. To provide support for paving, the subgrade soils shall be prepared as recommended below in grading mitigation measures (42 and 43). Compaction of the subgrade to at least 90%, including trench backfills, will be important for paving support. The preparation of the parking area subgrade shall be done immediately prior to the placement of the base course. Proper drainage of the paved areas shall be provided since this would reduce moisture infiltration into the subgrade and increase the life of the paving.

38. To provide information for paving design, stabilometer (R-value) test was performed on a sample of the upper soils. The results of the test, which indicated an R-value of 34, are presented in Appendix C (Geotechnical Reports), Figures A-5.1 through A-5.3.

39. The required asphaltic paving and base course thickness would depend on the anticipated wheel loads and volume of traffic. The recommended paving sections for a range of Traffic Indices are presented below. The paving sections were determined using the Caltrans design method. Careful inspection is recommended to verify that the recommended thicknesses or greater are achieved and that proper construction procedures are used.

Assumed Traffic Index	Asphaltic Paving (Inches)	Base Course (Inches)
4½ (Automobile Parking)	3	4
5½ (Driveways with Light Truck Traffic)	3	7
6½ (Roadways with Heavy Truck Traffic)	4	7

40. Portland cement concrete paving sections were determined in accordance with procedures developed by the Portland Cement Association. Concrete paving sections for a range of Traffic Indices are presented below. It is assumed that the portland cement concrete would have a compressive strength of at least 3,000 pounds per square inch. The concrete paving shall be properly reinforced. In addition, dowels are recommended at joints in the paving to reduce possible offsets.

Assumed Traffic Index	Paving Section (Inches)	Base Course (Inches)
4½ (Automobile Parking)	6	2
5½ (Driveways with Light Truck Traffic)	6½	2
6½ (Driveways with Heavy Truck Traffic)	7	2

41. The base course for both asphaltic and concrete paving shall meet the specifications for Class 2 Aggregate Base as defined in Section 26 of the latest edition of the State of California, Department of Transportation, Standard Specifications. Alternatively, the base course could meet the specifications for untreated base as defined in Section 200-2 of the latest edition of the Standard Specifications for Public Works Construction. The base course shall be compacted to at least 95%.

42. To provide support for the footings of minor structures, and for at-grade concrete walks and slabs adjacent to the building and for paving, all existing fill and disturbed natural soils shall be excavated and replaced with properly compacted fill, and all required additional fill shall be properly compacted. The footings of the minor structures shall be established in properly compacted fill and/or undisturbed natural soils.

43. Where excavations for minor footings are deeper than 4 feet, the sides of the excavations shall be sloped back at 1:1 (horizontal to vertical) or shored for safety. All footing and utility trench backfills shall be mechanically compacted; flooding shall not be permitted.

44. After excavating as recommended, the exposed soils in areas to receive additional fill shall be inspected and any disturbed deposits shall be excavated. The moisture content of the soils shall be determined, and the soils shall be slowly and uniformly moistened (or dried) as necessary to bring the soils to a uniformly moist condition. The moisture content of the cohesive soils and compacted fill shall be brought to between 2% and 4% over optimum moisture content to a depth of 6 inches. The moisture content of any non-expansive materials shall be brought to within 2% of optimum moisture content. The moisture content of the subgrade shall be checked and approved prior to placing the required fill.

45. After moistening as required, the exposed soils shall be compacted to at least 90% of the maximum dry density obtainable by the ASTM Designation D1557-91 method of compaction. The upper cohesive soils have a high moisture content, and it would be necessary to allow the surface to dry out prior to compacting. As an alternative, a layer of coarse crushed rock about 12 inches thick could be placed over the exposed soils to provide

a base for the compaction of the required fill. A geotextile fabric could be placed to help stabilize the subgrade soils and reduce the amount of gravel required. Where grading is interrupted by rain, fill operations shall not be resumed until the moisture content and dry density of the placed fill are satisfactory.

46. After compacting the exposed soils, or after placing the gravel layer, the required fill shall be placed in horizontal lifts not more than 8 inches thick and compacted to at least 90%. Relatively non expansive soils shall be compacted at a moisture content varying no more than 2% below or above optimum moisture content. It is recommended that the moisture content of the on site cohesive soils at the time of compaction be brought to between 2% and 4% over optimum moisture content.

47. The on site soils, less debris or organic materials within any existing fill soils, shall be used in the required fills. Any on site clay soils shall not be used as backfill behind any walls below grade. All required imported fill shall consist of relatively non expansive soils. The Expansion Index of the selected relatively non-expansive material shall be less than 35. Any import material shall contain sufficient fines (binder material) so as to provide a compacted fill that would be relatively impermeable and would be stable in shallow trenches.

48. The reworking of the upper soils and the compaction of all required fill shall be observed and tested by a qualified geotechnical expert. This representative shall have at least the following duties:

- Observe the clearing and grubbing operations to assure that all unsuitable materials have been properly removed.
- Observe the exposed subgrade in areas to receive fill and in areas where excavation has resulted in the desired finished subgrade, observe subgrade scarification, and delineate areas requiring overexcavation.
- Perform visual observation to evaluate the suitability of on site and import soils for fill placement; collect and submit soil samples for required or recommended laboratory testing where necessary.
- Perform field density and compaction testing to determine the percentage of compaction achieved during fill placement.
- Observe and probe foundation bearing materials to confirm that suitable bearing materials are present at the design grades.

Level of Significance after Mitigation

After incorporation of the mitigation measures listed above, impacts related to geology and soils would be less than significant.

Hydrology

Impacts

Groundwater Settlement and Groundwater Dewatering

The settlement at the project site would range between 0.2 and 0.3 inch, and the adjacent settlement (up to a few hundred feet from the project site) would range between 0.1 and 0.2 inch at the existing grade. Settlement ranging between 0.1 and 0.2 inch does not cause distress, such as surface or wall cracks in adjacent buildings, homes, or streets. Consequently, construction of the proposed project, including dewatering, would not produce settlement or subsidence that would adversely impact the adjacent properties or streets. Such settlements would not have any adverse impacts at the project site, or at the adjacent sites. Monitor and measuring of the settlements at the project site and the adjacent sites would be conducted during the dewatering operation.

Local Off-Site Investigations

Table 2 in Appendix C of this Draft EIR summarizes information from several prominent projects where the subterranean excavation extended below the groundwater table. Each project listed in Table 2 in Appendix C of this Draft EIR occurred without any reported settlement problems. No distress evidences caused by dewatering-related settlement were observed at any of the existing structures adjacent to these projects.

On-Site Investigation

Based on the information provided in Section IV.E. Hydrology on historic groundwater levels, it can be determined that the groundwater levels in the vicinity of the project site have fluctuated during the recent past more than the planned depth of the project site excavation and the associated groundwater levels that would be encountered during dewatering. This demonstrates that:

- The project site has experienced at least as much groundwater-level fluctuation than would occur when the project site is dewatered;
- The majority of the settlement that could be caused by the planned dewatering at the project site has already occurred; and

- Only very minor settlement could occur at the project site and the adjacent sites as a result of natural water-level fluctuation and the dewatering operations at the project site. The data obtained for off-site and on-site investigations indicate that dewatering of the site shall cause minor settlement that would not adversely impact the surrounding sites.

Impacts would therefore be less than significant.

Benzene in Groundwater

As described above, benzene and other volatile organic compounds (VOCs), including Ethylbenzene, Toluene, and Total Xylenes (BTEX) were not detected above the method detection limits in any of the groundwater samples collected from all nine (9) shallow wells and the pumping well (Q1). However, given the historical detection of benzene in on-site groundwater at a concentration above the State MCL, groundwater quality monitoring would continue to be performed during future dewatering operations.

Future Water Runoff and Drainage Patterns Conditions

The peak flow rates during the 10-year and the 25-year storms between the existing and proposed condition have no net change in flows. Therefore, there are no impacts to the surrounding public storm drain systems. As there would be no increase in runoff from the existing to the proposed conditions, there would be no significant impact on off-site drainage.

Mitigation Measures

Floor Slab or Mat Support

1. The required filter material (as discussed in Section IV.D. Geology and Soils, Mitigation Measures) for the subdrain system would offer adequate support for the floor slab or the mat foundation of the lower subterranean parking level. The at-grade concrete slabs and walks adjacent to the proposed building shall be also supported on grade. The lower floor slab or the mat of the building would be used for parking and should not be sensitive to capillary moisture, however, where vinyl or other moisture-sensitive floor covering is planned for portions of the lower floor slab or the mat, it is recommend that the floor slab or the mat foundation be underlain by a capillary break consisting of a vapor-retarding membrane at least 10 mils thick. A 2 inch-thick layer of sand should be placed beneath the membrane to decrease the possibility of damage to the membrane.

   If a membrane is used, a low-slump concrete should be used to minimize possible curling of the slab or the mat. A 2-inch-thick layer of coarse sand should be placed over the

membrane to reduce slab curling. Care should be taken during the placement of the concrete to prevent displacement of the sand. The concrete slab should be allowed to cure properly before placing vinyl or other moisture-sensitive floor covering.

Where vinyl or other moisture-sensitive floor covering is not planned, the floor slab or the mat foundation shall be supported directly on the subdrain materials.

Excavation Slopes and Dewatering

2. Excavation up to about 35 to 40 feet deep would be required for the lower subterranean parking level of the proposed development. Where the necessary space is available, temporary unsurcharged embankments shall be sloped back at 1:1 without shoring. Where space is not available, shoring shall be required. Data for design of shoring are presented in Section IV.D. Geology and Soils, Mitigation Measures.

3. Inspection of the foundation excavations shall also be required by the appropriate reviewing governmental agencies. The contractor shall be familiar with the inspection requirements of the reviewing agencies.

4. Where sloped embankments are used, the tops of the slopes shall be barricaded to prevent vehicles and storage loads within 10 feet of the tops of the slopes. A greater setback shall be necessary when considering heavy vehicles, such as concrete trucks and cranes; the engineer shall be advised of such heavy vehicles so that specific setback requirements can be established. If the temporary construction embankments are to be maintained during the rainy season, berms are suggested shall be installed along the tops of the slopes, where necessary, to prevent runoff water form entering the excavation and eroding the slope faces.

5. The soils at the excavated level will be wet and spongy. To provide support for foundations and a working base for men and equipment, a layer of 1½-inch crushed rock at least 1-foot-thick shall be provided over the excavated surface.

6. The excavation shall be observed a qualified geotechnical expert so that any necessary modifications based on variations in the soil conditions encountered can be made. All applicable safety requirements, including OSHA requirements, shall be met.

7. The excavation for the spread footings or the mat foundation would extend below the ground water level, and dewatering of the excavation shall be required. The dewatering could be done by means of dewatering wells located around the perimeter of the site with supplementary wells located within the limits of the excavation. The dewatering system

shall be placed several weeks prior to the start of excavation. In addition, a few monitoring wells shall be placed at the site to monitor the water level. The excavation at the site shall not start until the water level is withdrawn a few feet below the bottom of the excavation. In addition, drainage trenches excavated at the bottom of the excavation and backfilled with crushed rock shall be used to supplement the wells. The trenches shall be placed in areas between the foundation locations and should drain, together with the wells, into sumps equipped with pumps. The trenching should be coordinated with the construction sequencing.

8. The dewatering system shall be designed by a competent dewatering contractor. The contractor shall determine the size, spacing, and depths of the dewatering wells. In addition, the contractor shall determine the locations and sizes of any necessary trenches within the excavation, and the volume of water inflow from the dewatering system.

9. Given the historical detection of benzene in on-site groundwater at a concentration above the State MCL, groundwater quality monitoring shall continue to be performed during future dewatering operations.

10. Any groundwater discharge from construction dewatering and the proposed permanent sub-drain system at the site would be treated as required and discharged to the local discharge point (outfall) in accordance with the discharge requirements of the National Pollutant Discharge Elimination System (NPDES) General Permit, which consists of Order No. R4-2003-0111 and Monitoring and Reporting Program No. CI-8745, issued on May 4, 2004. Also, in accordance with the reuse agreements between Fifield and the Los Angeles Country Club (LACC), some of the discharge groundwater from the proposed permanent sub-drain system, if found to be of suitable quality, will be conveyed to the nearby LACC for reuse.

Subdrain System

11. Ground water was encountered above the planned lower subterranean parking level and provisions must be taken to protect the building from hydrostatic pressure. The following measures pertain to subdrain system beneath the floor slab (if spread footings are used) and beneath the mat foundation (if the mat is used) to support the building.

    One of the two following alternative procedures shall be followed. A permanent subdrain system could be installed beneath the lower floor or mat of the building to maintain the water level below the lower subterranean level, or the lower subterranean floor slab or mat and the lower portions of the subterranean walls could be waterproofed and designed for the

possible hydrostatic pressure. To compute the hydrostatic pressure, it shall be assumed that the water level would be at a depth of 15 feet below the existing grade. The design of the lower floor slab or mat to resist the possible hydrostatic pressure would require a thorough waterproofing installation and relatively thick floor slab or mat.

If a subdrain system is installed, discharge would have to meet the requirements of the National Pollutant Discharge Elimination System (NPDES) General Permit. A water treatment system shall be required if the chemicals or pollutants within the water exceeds the allowable limits.

For a subdrain system, the lower floor or mat of the building shall be underlain by a layer of filter material approximately 1 foot thick. The filter material shall be drained by subdrain pipes leading to sump areas equipped with automatic pumping units. The filter material shall meet the requirements of Class 2 Permeable Material as defined in Section 68 of the latest edition of the State of California, Department of Transportation, Standard Specifications. If Class 2 material is not available, ¾-inch crushed rock separated from the adjacent soils by a filter fabric shall be used. The crushed rock shall have less than 5% passing a No. 200 sieve. The drain lines shall consist of perforated pipe placed, with the perforations down, in trenches extending at least 1 foot below the filter material. The trenches shall be backfilled with material meeting the requirements of the Class 2 Permeable Material or lined with filter fabric and filled with ¾-inch crushed rock. The drain lines shall extend around the perimeter of the building and should be spaced approximately 40 feet apart within the interior of the building. A slope of at least 2 inches per 100 feet shall be used for the drain lines. Based on the results of a field pumping test, we suggest that the pumps and sumps be sized for a total inflow into the system of 450 gallons per minute. The actual inflow into the subdrain system is expected to be less.

12. In addition to the above drainage system, some means of draining the soils outside the exterior walls will be required. The means of accomplishing drainage outside the walls would depend primarily on the selected method of shoring and the method of constructing the exterior building walls. A drainage system behind the basement walls shall be provided by strips of Miradrain 6000 (or equivalent). Miradrain 6000 (or equivalent), attached to the lagging and protected from the concrete placement of the walls, would provide satisfactory drainage. Continuous Miradrain shall be placed at a depth starting at about 3 feet below the existing grade.

    The Miradrain shall be connected to weep holes at the bottom of the excavation. The weep holes should consist of solid pipes spaced at 8 feet on centers. At the connection of the weep holes and the Miradrain, the weep holes shall be embedded in 1 cubic foot of free-

drainage aggregate surrounded by a filter fabric. The weep holes shall drain into the subdrain system placed beneath the slab of the lower subterranean level or into a solid pipe placed beneath the edge of the lower floor slab. The solid pipe shall discharge into the sump.

The installed drainage system should be observed by a qualified dewatering contractor.

Level of Significance after Mitigation

After incorporation of the mitigation measures listed above, impacts related to dewatering and surface runoff would be less than significant.

Land Use

Impacts

Consistency with City Zoning Classification Requirements

The project would be designed and developed in accordance with the [Q]R5-3 zoning requirements for the property, which allow for high-density development with a maximum floor area ratio of 10:1. Thus, no significant impacts would result from the proposed project with regard to zoning inconsistency.

Consistency with the Westwood Community Plan

As the project consists of 35 units it would be consistent with the Westwood Community Plan, which restricts development to 163.5 multi-family dwelling units per acre, allowing for up to 93 units to be developed on the project site. The proposed project would also be consistent with applicable Community Pan objectives related to housing, open space, police protection, fire protection, and transportation. Therefore no significant impacts would result from the proposed project with regard to the Westwood Community Plan.

Consistency with the Corridor Specific Plan

Although the proposed project is within the Wilshire-Westwood Scenic Corridor Specific Plan area, it is exempted from the Corridor Specific Plan's provisions. On June 29, 1977, the Los Angeles City Planning Department issued a Conditional Negative Declaration (CND) for a condominium project at 10250 West Wilshire Boulevard (CND-213-77-SUB). The Tentative Tract Map (TTM) was recorded on October 31, 1979. Conditions for TTM 27025 provide that development on the project site be limited to no more than 35 units and a minimum of 103 parking spaces. The Wilshire-Westwood

Scenic Corridor Specific Plan became effective in 1981, shortly after the Final Tract Map was recorded. If a Tract Map application for a project was filed between July 25, 1972 and June 5, 1980, the project is exempt from the Corridor Specific Plan pursuant to Ordinance 155,044, Section 14.A of that plan. As the Tract Map application for the proposed project was filed in the mid-1970s, the proposed project is exempt from the provisions of the Corridor Specific Plan. Therefore, no significant impacts would result from the proposed project with regard to the Corridor Specific Plan.

Land Use Compatibility

The project is consistent with the land use pattern along Wilshire Boulevard, which generally includes multi-family mid-rise and high-rise apartments and condominiums. Therefore, no significant impacts would result from the proposed project with regard to land use compatibility.

Mitigation Measures

Because the proposed project is consistent with existing land use regulations and adjacent land uses, no mitigation measures are required.

Level of Significance after Mitigation

Project impacts associated would be less than significant.

Noise

Impacts

Construction Activities (City Thresholds)

The nearest and most notable sensitive receptor to the project site is the four two-story single-family residential units located approximately 50 feet south of the project site, across Club View Drive. Noise levels at these homes shall reach a maximum of 89 dBA Leq during site grading, excavation, and finishing. Because construction activities would last more than one day and would increase the ambient noise levels by 10 dBA or more at the off-site single family residential units as well as the off-site multi-family residential units, both directly adjacent to the proposed project site, this impact shall be considered significant.

However, even though the construction activities shall exceed noise thresholds outlined in the City's General Plan Noise Element, they would be temporary in nature and would be limited to between the hours of 7:00 a.m. and 6:00 p.m. on Monday through Friday and from 8:00 a.m. and 6:00 p.m. on Saturday and Sunday. Nevertheless, even though the construction of the proposed project would be

limited to the hours outlined above, and implementation of mitigation measures listed below would be required, construction of the proposed project would result in a short-term, significant and unavoidable impact.

Groundborne Vibrations

With the presence of a sensitive receptor within close proximity to active construction of the proposed project, the chance for exposure to excessive vibration levels shall increase. However, even though construction activities shall exceed the Federal Railway Administration 80 VdB threshold, they would be limited to between the hours of 7:00 a.m. and 6:00 p.m. on Monday through Friday and from 8:00 a.m. and 6:00 p.m. on Saturday and Sunday in accordance with the City of Los Angeles Noise Ordinance. Therefore, construction would not occur during recognized sleep hours. This would result in a less than significant impact. No mitigation is required.

Permanent Increase in Ambient Noise Levels

Off-site locations in the vicinity would experience increased noise caused by traffic generated by the proposed project. The proposed project would increase local noise levels by a maximum of 0.1 dB(A) CNEL. Because this is below the 3.0 dBA threshold, this impact would be less than significant. No mitigation would be required.

Temporary or Periodic Increase in Ambient Noise Levels

Project development, while contributing to an overall increase in ambient noise levels in the project area, would result in land uses that are consistent with the General Plan land use designation for the project site. In addition, exterior-to-interior reduction of newer residential units in California is generally 30 dBA or more. Therefore, impacts associated with noise generated as a result of the operation of the proposed project would be less than significant. No mitigation would be required.

Mitigation Measures

1. Construction activities shall be limited to the hours of 7:00 a.m. to 6:00 p.m. Monday through Saturday, and 8:00 a.m. to 6:00 p.m. on Saturday and Sunday.

2. All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.

3. Noise construction activities whose specific location on the site shall be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or

manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.

4. The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, jackhammers, and pile drivers.

Level of Significance after Mitigation

With respect to construction noise impacts, even with the implementation of the identified mitigation measures, short-term construction noise impacts would remain unavoidably significant during high noise level events.

Operational noise impacts would be less than significant.

Traffic/Transportation

Impacts

Project Trip Generation

Traffic generation rates for various land uses are specified in the current West Los Angeles Transportation Improvement and Mitigation Specific Plan (TIMP). While this document lists the critical PM peak hour trip rates for condominium projects, such as the proposed project, the daily and AM peak hour trip rates and inbound/outbound directional split percentages are not provided. Therefore, daily and AM peak hour trip generation characteristics were obtained from studies conducted by the Institute of Transportation Engineers (ITE).

Parking and Access

The project would provide 103 parking spaces, which is 15 more spaces than required by Code. Vehicular access to the multi-level subterranean parking structure would be provided by two project driveways located on Club View Drive at the southern boundary of the project site. One inbound-only driveway and one outbound-only driveway would provide access to and from the valet parking provided in the structure. Therefore, parking impacts related to the construction of the proposed project would be less than significant.

Analysis of Future (2007) Traffic Conditions, Without and With Project

Prior to the addition of project traffic, the intersection of Beverly Glen Boulevard and Wilshire Boulevard is expected to operate at LOS F during both peak hours. The remaining study intersections are expected to operate at LOS D or better in the year 2007. Although the addition of project traffic would slightly increase the CMA or delay value at all of the study intersections during both peak hours, the incremental project traffic additions would not result in a change in level of service at any of the study intersections that would exceed the established threshold of significance criteria. Therefore, future traffic impacts related to the construction of the proposed project would be less than significant.

Residential Street Traffic Impacts

It is estimated that the proposed project would result in an addition of approximately 135 vehicles per day on Comstock Avenue and an additional 40 vehicles per day on Club View Drive. The traffic analysis conducted for the proposed project concluded that neither of these roadway segments would be significantly impacted by the proposed project (see Appendix D). Therefore residential street traffic impacts related to the construction of the proposed project would be less than significant.

Congestion Management Program (CMP) Analysis

The nearest arterial CMP monitoring station is located at Wilshire Boulevard and Beverly Glen Boulevard, west of the project site. For the proposed project, the maximum number of freeway directional trips would be 13 inbound trips during the PM peak hour, which is substantially less than the freeway threshold of 150 directional trips. Therefore no additional CMP freeway analysis is necessary and freeway impacts related to the construction of the proposed project would be less than significant.

Recommendations

No significant traffic impacts have been identified for the proposed project. Therefore, no traffic mitigation measures are required. However, the following recommendations would further ensure that project-related impacts remain less than significant.

1. Valet – All parking at the project site should be facilitated by parking valets. A valet "call up" system should be implemented to retrieve parked vehicles in a timely fashion for residents and guests.

2. Transit Information – As noted in the above analysis, the project site is served by excellent local and regional transit service. The lobby should contain a display of transit schedules and maps to assist employees, residents or guests with transit options.

3. Moving Vans – The building management should maintain a "Moving Day/Furniture Delivery" log. This should be used to coordinate moving vehicles so only those that can fit onsite for scheduled loading or unloading are accommodated. All loading activity would be on-site. In the event an oversized moving truck is used, it would be required to remove the vehicle cab so that the moving vehicle completely fits on-site.

4. Neighborhood Traffic Calming – While the project traffic does not warrant or require off-site measures to improve street system capacity or traffic calming measures, it is suggested that the project participate with local residents if there is a community-wide effort to address "cut thru" traffic issues.

Level of Significance after Mitigation

Traffic impacts associated with the proposed project would be less than significant.