
I. EXECUTIVE SUMMARY

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

1. PURPOSE OF THE DRAFT EIR

This Draft EIR is a Project EIR, as defined by Section 15161 of the State CEQA Guidelines and, as such, serves as an informational document for the general public and project decision-makers. The City of Los Angeles (City) has the principal responsibility for approving the proposed project and, as the Lead Agency, is responsible for the preparation and distribution of this Draft EIR pursuant to CEQA Statute Section 21067. This Draft EIR shall be used in connection with all other permits and all other approvals necessary for the construction and operation of the proposed project. This Draft EIR shall be used by the City of Los Angeles Department of Planning, Department of Building and Safety, Department of Transportation, and Department of Public Works, including the Bureaus of Engineering and Sanitation, City Council of the City of Los Angeles, and all other responsible public agencies that must approve activities undertaken with respect to the project.

This Draft EIR evaluates the environmental impacts determined by the City to be potentially significant and provides mitigation measures as appropriate. Due to changing market forces, the Applicant is requesting review of two development options, Option 1 and Option 2, which are both fully evaluated in this EIR. Option 1 is referred to as the Hotel/Condominium Project and Option 2 is referred to as the Condominium Project. This approach would provide flexibility to respond to the market prevailing at the time entitlement has been completed.

In general, impacts that cannot be mitigated to a level below significance are considered significant unavoidable adverse impacts. In accordance with Section 15130 of the State CEQA Guidelines, this Draft EIR also includes an examination of the effects of cumulative development in the vicinity of the proposed project. Cumulative development includes all anticipated future projects that, in conjunction with the proposed project, may result in a cumulative impact. In

addition, this Draft EIR evaluates the extent to which environmental effects could be reduced or avoided through the implementation of feasible alternatives to the proposed project. Furthermore, the City is responsible for certifying the Draft EIR and adopting any mitigation measures needed to address the proposed project's significant environmental impacts. For projects that result in any unmitigated or under-mitigated significant environmental effects, the City may, after making a series of findings, certify the Draft EIR upon adoption of a Statement of Overriding Considerations pursuant to CEQA Guidelines Section 15093.

2. EIR FOCUS AND EFFECTS FOUND TO BE LESS THAN SIGNIFICANT

In accordance with Section 15128 of the CEQA Guidelines, an EIR shall contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the Draft EIR. Section VI, Other Environmental Considerations, Subsection F, of this EIR, provides a summary of the Effects Found To Be Less Than Significant, based on the Initial Study that was prepared for the project. The Initial Study is included within Appendix A of the Draft EIR. The Initial Study provides a detailed discussion of the potential environmental impact areas and the reasons that each topical area is or is not analyzed further in the Draft EIR. Based on the initial study, it was determined that the project may result in potentially significant impacts in the following issue areas:

- Aesthetics/Visual Resources;
- Air Quality;
- Hazards and Hazardous Materials;
- Land Use;
- Noise;
- Public Services:
 - Fire Protection;
 - Police Protection;
 - Schools;
 - Libraries;
 - Parks and Recreation; and
- Traffic and Circulation.

The City of Los Angeles determined through the Initial Study that the proposed project would not have the potential to cause significant impacts in the following areas: Agricultural Resources, Biological Resources, Cultural Resources, Geology and Soils, Mineral Resources, Population and Housing, Solid Waste, and Utilities, including water and wastewater. Therefore, these areas, with the exception of water and wastewater, are not examined in this Draft EIR. A demonstration that no significant impacts would occur for these issue areas is provided in the project's Initial Study, which is included in Appendix A of this Draft EIR.

In response to the Notice of Preparation, a letter was submitted by the City of Los Angeles Wastewater Engineering Services Division of the Bureau of Sanitation. The letter indicated that a potential impact could result from the project relative to wastewater and that a gauging study is necessary. Therefore, an analysis regarding wastewater was added to the EIR. In addition, as the project requires an amendment of the City of Los Angeles General Plan that would increase development intensity compared to the intensity of development allowed by the current land use designation, water supply has also been added to the scope of subjects evaluated in the EIR.

3. EIR ORGANIZATION

The Draft EIR is comprised of the following sections:

- I. Executive Summary.** This section describes the purpose and focus of the Draft EIR, Draft EIR organization, background information regarding the project site, a summary of the project, areas of controversy/issues to be resolved, a description of the public review process, a summary of alternatives evaluated, and a summary of environmental impacts and mitigation measures.
- II. Project Description.** This section describes the project location, existing conditions, project objectives, project characteristics for Option 1 and Option 2, and a description of the intended use of the Draft EIR.
- III. General Description of Environmental Setting.** This section contains a description of the existing physical and built environment and a list of related projects anticipated to be built within the project vicinity.
- IV. Environmental Impact Analysis.** This section contains the environmental setting, project impact analyses for Option 1 and Option 2, cumulative impact analyses, mitigation measures, and conclusions regarding the level of significance after mitigation for each of the following environmental issues: (1) aesthetics/visual resources, (2) air quality, (3) hazards and hazardous materials, (4) land use, (5) noise, (6) fire protection, (7) police protection, (8) schools, (9)

libraries, (10) parks and recreation, (11) traffic and circulation, (12) water, and (13) wastewater.

- V. Alternatives.** This section provides analysis of each of five alternatives to the proposed project (Option 1 and Option 2), which include the following: No Project/No Build Alternative; Development in Accordance with Existing Regulations Alternative – Medical Office; Modified Project Alternative; Hotel Alternative; and Office Alternative.
- VI. Other Environmental Considerations.** This section contains several subsections, most of which are required under CEQA Guidelines Section 15126.2, Consideration and Discussion of Significant Environmental Impacts. This section provides a summary of significant unavoidable impacts that would result from the proposed project and the reasons why the project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment that would result from the proposed project is also included in this section. This section analyzes growth-inducing impacts in which the project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Potential secondary effects caused by the implementation of the mitigation measures for the proposed project are also discussed. Last, a discussion of the effects that were determined within the Initial Study not to be significant is provided.
- VII. References.** This section lists all the references and sources used in the preparation of the Draft EIR.
- VIII. List of Preparers.** This section lists all of the persons, public agencies, and organizations that were consulted or contributed to the preparation of this Draft EIR.

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

- Appendix A – Initial Study/NOP/NOP Comment Letters;
- Appendix B – Air Quality Worksheets;
- Appendix C – Hazardous Materials Technical Reports;
- Appendix D – Noise Worksheets;
- Appendix E – Traffic Study;
- Appendix F – Gauging Study.

4. SITE BACKGROUND AND EXISTING CONDITIONS

The approximately 0.55 acre site is relatively flat and was previously used for retail uses and a gas station. The south parcel is currently developed with a one-story, 30-foot commercial building with a building footprint of approximately 9,873 square feet and roof top parking. The building was occupied by Hollywood Video, which recently closed.

The north parcel within the site is currently vacant. This parcel was previously developed with a gas station. Surface structures and underground storage tanks (USTs) have been removed. Remedial systems were set up on this parcel to address identified soil and groundwater contamination from the gas station use. The remedial systems were removed from the site in May 2007.

An alley runs along the north edge of the site and aligns with Lindbrook Drive. The alley runs from Kinross to the north end of the project site and then turns east and runs to Gayley Avenue.

The north parcel is designated Community Commercial in the General Plan Framework and the Westwood Community Plan. The north parcel is also located within the Westwood Village Specific Plan area. This parcel comprises the southernmost parcel within the Specific Plan area. The north parcel is zoned C4-2D-O, Community Commercial – Development Limitation. The C4 portion of the designation indicates that the site is zoned for a wide range of commercial and residential uses. The D indicates a Development Limitation to ensure consistency with the Westwood Village Specific Plan. The third part of the zoning designation indicates that the project site is within a supplemental oil drilling district (O).

The south parcel within the project site is designated Regional Center Commercial in the General Plan Framework and the Westwood Community Plan. This parcel is zoned [Q]C4-2-O, Community Commercial-Qualified Classification. This parcel is not located within the Westwood Village Specific Plan area boundary. The second part of the zoning designation indicates that the site is located in Height District 2, which has no height limit but restricts development to a 6 to 1 floor area ratio (FAR).¹ The [Q] conditions imposed on the northern two-thirds of the parcel under Ordinance No. 170,054, further restrict the maximum FAR and height. Under Ordinance No. 170,054, “[n]o building or structure located on the subject property shall exceed 31 feet in height” and “[a]ll buildings constructed on the property shall have a total

¹ Floor area ratio is the relationship of the on-site square footage to the building area. A 6.0:1 FAR means that the building would be limited to six square feet of floor area for each square foot of land area; or floor area six times greater than land area.

gross floor area of not greater than 7,000 square feet.”² (Ordinance No. 170,054 at 3.) Accordingly, development on the south parcel’s northern 7,000 square feet is limited to a height of 31 feet, while the southern portion of the parcel’s 3,000 square feet is limited to a 6:1 FAR. As with the north parcel, the O indicates that the south parcel is within a supplemental oil drilling district. Although no petroleum extraction activities currently occur within the project site, the “O” designation indicates the potential for methane associated with any shallow petroleum or gas deposits. Respectively, the project site is located within a designated Methane Buffer Zone.

5. PROPOSED PROJECT

a. Project Location and Surrounding Uses

The project site consists of two parcels at the northwest corner of Wilshire Boulevard and Gayley Avenue. The approximately 23,951 square foot (0.55 acre) irregular-shaped project site is generally triangular in shape with the point of the triangle located on Wilshire Boulevard. The project site is bounded by Wilshire Boulevard to the south, Gayley Avenue to the east, UCLA’s surface parking (Lot 36) and single-story UCLA building within the parking lot area to the west, and a public alley to the north. The south parcel is located at 10951-10955 Wilshire Boulevard and the north parcel is located at 1151-1157 Gayley Avenue.

The site is located in the Westwood Community Plan area of the City of Los Angeles, approximately 11 miles west from downtown Los Angeles and 4.5 miles northeast from the Pacific Ocean. Regional access to the site is provided by Interstate 405 (San Diego Freeway), which is located approximately 0.39 miles to the west.

The site is located at the southern edge of the area known as Westwood Village. The north parcel is located within the Westwood Village Specific Plan area while the south parcel is located just outside the Specific Plan area. Westwood Village is a vibrant, pedestrian-oriented area with a mix of commercial uses, including retail, restaurant, services, residential condominiums, and office uses. The University of California Los Angeles (UCLA) campus is located just north of Westwood Village. Many of the uses in the Village serve the students, faculty, and visitors to the UCLA campus.

Land uses along Wilshire Boulevard to the south of Westwood Village and east and west of the project site are different in character from Westwood Village’s development. Within the Westwood Community, Wilshire Boulevard is dominated by high-rise buildings ranging from

² *These [Q] conditions were specifically referenced and retained when the City enacted the Wilshire Boulevard Sign Ordinance in 2000. (See Ordinance No. 173,680 at 7.)*

15- to 29-stories in height. Within the project vicinity, west of Glendon Avenue, these buildings are primarily commercial in nature and the area, which incorporates the south parcel, is designated as a “Regional Center.” Within the immediate project site vicinity, nine high-rise towers are located to the west of Glendon Avenue, including 360-foot-high and 355-foot-high towers that are located directly across Wilshire Boulevard from the project site. Along this section of Wilshire Boulevard, commercial towers adjoin low-rise commercial uses to the north and south of Wilshire Boulevard. To the east of Glendon Avenue, high-rise buildings along the Wilshire corridor adjoin low-rise residential uses to the north and south of Wilshire Boulevard.

An approximately 10-story office building (10921 Wilshire Boulevard), oriented toward Wilshire Boulevard and incorporating a three-story parking structure along its Gayley Avenue frontage, is located just to the east of the south parcel, directly across Gayley Avenue. Directly across Gayley Avenue from the project site’s north parcel is a two-story commercial building (10920 Lindbrook Drive) containing office, retail and restaurant uses. The east side of Gayley Avenue is primarily occupied by the garages serving the 10920 Lindbrook Drive and 10921 Wilshire Boulevard buildings, although a single-story retail use associated with the 10921 Wilshire building fronts the northeast corner of the Wilshire and Gayley and a two-story office use associated with the 10920 Lindbrook Drive building fronts the southeast corner of Lindbrook and Gayley. Farther east at the northeast corner of Wilshire Boulevard and Westwood Boulevard is the Armand Hammer Museum of Art and Cultural Center, a mid-rise building. The Armand Hammer Museum, which is operated by UCLA, includes display halls, meeting rooms, and a theater for both live and film presentations.

Directly to the west of the site to the north of Wilshire Boulevard is a UCLA property, which contains a surface parking lot (UCLA Parking Lot 36), a single-story UCLA Campus Police building, and a three-story UCLA Library Tech Services building. Farther to the west of the site across Veteran Avenue, also at the north side of Wilshire Boulevard, is the more than 144-acre Los Angeles National Cemetery. The cemetery and the UCLA Lot 36 and low-rise buildings within the UCLA Lot 36 are the only land uses and buildings directly to the west of the project site at the north side of Wilshire Boulevard, between the project site and the I-405 freeway. The Wilshire Federal Office Building is located to the west of the project site, at the south side of Wilshire Boulevard and west side of Veteran Avenue. This building is approximately 261 feet in height and is the first high-rise building in the western approach to the Wilshire Boulevard high-rise corridor from the I-405 freeway. The federal building and the Los Angeles National Cemetery were formerly located within the Veterans Administration campus, which, combined with the existing Veterans Administration medical campus to the west of I-405, originally comprised more than 600 acres. When combined with the Los Angeles National Cemetery, the Veterans Administration medical campus still contains several hundred acres and forms a substantial open space, traversed by the I-405 freeway. In addition to land used for the federal building, much of the original acreage was also consumed by the I-405 alignment. The expanse of permanent open space in the vicinity of the I-405 freeway, and to the north of

Wilshire Boulevard, provides a defined contrast to the dense urban development within the Westwood community and allows broad views toward the Wilshire Boulevard high-rise corridor from the west.

The project site is well served by local transit agency bus service. Bus service in the area includes the Los Angeles County Metropolitan Transportation Authority (Metro), LADOT, Santa Monica's Big Blue Bus, Culver CityBus, and Antelope Valley Transportation Authority (AVTA).

b. Project Characteristics

Due to changing market forces, the Applicant is requesting review of two development options. Option 1 is referred to as the Hotel/Condominium Project, and Option 2 is referred to as the Condominium Project. Both options are described below and are fully evaluated in this EIR.

The building under Option 1 or Option 2 would include a total of approximately 303,709 gross square feet, with approximately 6,510 ground floor square feet of quality retail uses along Gayley Avenue and at the southernmost portion of the site fronting Wilshire Boulevard. The building envelope and exterior treatment would be the same for Option 1 and Option 2. The building under Option 1 or Option 2 would be 29 stories tall and approximately 427 feet high. Under both options, parking would be provided in a four level, approximately 200-space subterranean garage. The parking would operate with a valet service under both options.

Option 1 – Hotel/Condominium Project

Under Option 1, the site would be developed with a 134-room luxury business hotel that would include amenities such as a public restaurant, a coffee shop, a business center with meeting rooms, a swimming pool, a spa, and a fitness center. Option 1 would also include 10 for-sale condominiums and approximately 6,510 square feet of ground floor quality retail uses.

The hotel office and lobby (approximately 4,340 square feet) would be located to the north of the retail space at the ground level. The second floor would have an approximately 4,500 square foot fitness center for hotel guests, administration, laundry and service areas for the hotel use. The third floor would contain back of house uses for the hotel, an approximately 3,800 square foot coffee shop, an approximately 3,000 square foot day spa, mechanical rooms and pool equipment. The third floor would cantilever over a motor court at the north end of the property creating a landscaped terrace and pool deck at the fourth floor level. The fourth floor would include approximately 9,975 square feet of floor area adjacent to the pool deck which would be devoted to a Class A public restaurant and bar.

The 134 units operated as hotel rooms together with 10 for-sale condominiums would comprise approximately 197,994 square feet of floor area and would be located on floors five through 29. The hotel rooms and the for-sale condominiums would range in size from approximately 300 to 6,734 square feet of usable floor area. The hotel rooms would be located on floors five through 21. Floors five to 10 would each contain nine hotel rooms and floors 11 through 13 would each contain eight hotel rooms and floors 14 through 21 would each contain seven rooms. The 10 condominium units would be located on floors 22 through 29.

Option 2 – Condominium Project

Under Option 2, the site would be developed with 144 condominium units. The building would include amenities such as a public restaurant, a coffee shop, a business center with meeting rooms, a swimming pool, a spa, and a fitness center. Option 2 would also include approximately 6,510 square feet of ground floor quality retail uses.

The lobby for the residential building would be located to the north of the retail space at the ground level. Option 2 would contain the same amenities to those provided in Option 1. An approximately 4,500 square foot fitness center for use by residents would be located on the second floor in Option 2. In addition, the second floor would contain administration, laundry and service areas for use by the residents of the condominiums. The third floor would contain back of house uses, an approximately 3,800 square foot coffee shop, an approximately 3,000 square foot day spa, mechanical rooms and pool equipment. The third floor would cantilever over the motor court at the north end of the property creating a landscaped terrace and pool deck at the fourth floor level. The fourth floor would include approximately 9,975 square feet of floor area adjacent to the pool deck which would be devoted to a Class A public restaurant and bar.

The 144 condominium units would be located on floors five through 29. Floors five to 10 would each contain nine condominium units, floors 11 through 20 would each contain eight condominium units, and the remaining 10 condominium units would be located on floors 21 through 29. The condominiums would comprise approximately 197,994 square feet of floor area. The condominiums would range in size from approximately 300 to 6,734 square feet of usable floor area.

Option 1 and Option 2

As indicated above, the design, building envelope and exterior treatment would be the same for Option 1 and Option 2. In addition, access and parking would be the same under both options. The following provides a description of the access and parking as well as the

architecture, landscaping, lighting, and signage that would occur with both Option 1 and Option 2.

Access and Parking

Vehicular access to the site would be from the public alley that runs along the north boundary of the site. This vehicular access would lead to the circular driveway, which would provide a drop-off and pick-up area for users of the building. The alley access would lead to the circular drive as well as to the subterranean parking structure. The subterranean parking structure would be accessed from the western end of the site.

On-site parking would be provided in a four-level subterranean parking facility that would accommodate approximately 200 parking spaces. With the use of valet and tandem parking, the parking structure would be able to accommodate up to 260 spaces. Option 2 would provide 226 parking spaces off-site at the Center West building, located at 10877 Wilshire Boulevard, or Plaza la Reina, currently under construction at 10844-10852 Lindbrook Drive. The latter is adjacent to Center West. Both locations are located two blocks east of the site. The driveways to the underground parking at both locations are located on Lindbrook Drive and the driveways are adjacent to one another. The off-site parking would be reserved for use by The Wilshire Gayley project through a covenant that would be recorded and would run with the land.

Two bays for loading would be provided at the northwestern corner of the hotel. Access to the loading area would be via the alley. The trash collection area would also be located at the rear of the property near the parking structure entrance. Delivery and trash collection areas and the parking structure entrance would be screened from public view by a wall incorporated into the building design extending along the circular driveway.

With regard to pedestrian access, the sidewalk along the Gayley Avenue frontage currently is substandard and uneven in its width. At points the existing sidewalk is three feet in width. The proposed project would include widening of the existing sidewalk on Gayley Avenue to a uniform dimension of ten feet and would require no reduction in the current Gayley Avenue right-of-way.

Building Design

The building would create a “flatiron” façade at Wilshire Boulevard. The building would be tiered, stepping back at the 4th, 11th, 21st, and 26th floors, creating a less imposing profile through articulation and reducing the project’s scale on the Westwood Village side.

The building façade would be highly articulated with classical punched openings of graduated sizes, stone and pre-cast architectural detailing. The building façade would have vertical and horizontal symmetries. The building would have a well-defined, three-story base. The cornice on the north parcel and adjacent to Westwood Village would align with the adjacent commercial building. At the ground level, the structure would have large retail display windows, pedestrian-scale landscaping, and an entrance canopy. The design allows direct pedestrian access to retail uses at Wilshire Boulevard as well as along Gayley Avenue. Pedestrian access to the building lobby would be from Gayley Avenue.

The third floor of the building would cantilever over the vehicular access area and becomes a porte-cochere over the proposed motor court on the north side of the building. The fourth floor deck created by the porte-cochere would feature a glass-bottom pool, gardens and a restaurant. The fourth floor extending beyond the tower would serve to break up the building mass and would add articulation and visual interest to the building's north façade.

The building's base would step back at the fourth floor, which serves to accentuate the triangular point of the building at Wilshire Boulevard. The base of the building would provide vertical architectural elements that would be seen from Wilshire Boulevard as one would approach Westwood Village. The western base of the building would be built to the property line adjacent to UCLA's existing surface parking lot.

The building would be finished with pre-cast concrete with cast articulation of architectural details. The lower floors would have natural stone work accents. Double paned tinted glass would be used, which would ensure energy savings and would reduce outside noise in the hotel rooms and residences. Railings, awnings and door hardware would be ornamental bronze, nickel or brass. Glazing would be in the form of "punched" openings set back in the façade. The proposed project would not incorporate broad expanses of reflective surfaces.

Overall, the project would be 29 stories and approximately 427 feet high. An emergency helipad would be located on the building rooftop. The proposed project would have a FAR of approximately 10.93:1.

Landscaping, Lighting, and Signage

An approximately 1,160-square-foot landscaped area would be provided at the northwest corner of Wilshire Boulevard and Gayley Avenue. In addition, perimeter landscaping would be provided along the Gayley Avenue building frontage. The proposed landscaping would provide for a combination of in-ground and potted plants of varying scales along Gayley Avenue. In addition, landscaping would be planted at every tiered level of the building as well as around the motor court, which is located on the north side of the building. The fourth floor terrace would

also be landscaped. In accordance with the City's goal of responsible environmental design, plant material would be drought tolerant.

Exterior lighting would enhance the architectural detailing and would provide pedestrian security on site. All lighting on the site would be shielded and directed towards the areas to be lit and away from adjacent uses. Lighting would be strategically placed to minimize spill onto adjacent properties. Lighting for architectural highlighting would be designed to be dimmable.

Signage would comply with the Los Angeles Municipal Code. The proposed project would not include any signs that flash, move or have the appearance of movement; off-site commercial signs; pole signs; projecting signs that exceed an appropriate size or height above ground level; or roof signs. The project would require approval for an awning sign at the entrance along Gayley Avenue.

6. CONSTRUCTION

Construction of the project would begin in approximately the third quarter of 2009 and would end in 2012. The project would require excavation of approximately 50,000 cubic yards of earth to accommodate the subterranean garage. The construction truck haul route would be via Wilshire Boulevard to the I-405. Construction staging would include temporarily blocking off the alley north of the site. Temporary construction worker parking would be required off-site at Center West, which is located two blocks to the east of the site at 10877 Wilshire Boulevard.

a. Statement of Project Objectives

Section 15124(b) of the CEQA Guidelines states that the project description shall contain "a statement of the objectives sought by the proposed project." In addition, Section 15124(b) of the CEQA Guidelines further states that "the statement of objectives should include the underlying purpose of the project." The underlying purpose of the proposed project is to create a high quality, architecturally significant, mixed-use hotel, residential, and retail project that is compatible with the intensity of development along the Wilshire corridor and contributes to the pedestrian environment in the Westwood Village.

As set forth by the CEQA Guidelines, the list of objectives that the Applicant seeks to achieve for the project is provided below. The objectives of the project are listed within the following categories: Development Objectives, Design Objectives, Community Plan Objectives, and Economic Objectives. The majority of the objectives apply to both Option 1 (Hotel/Condominium Project) and Option 2 (Condominium Project). However, given the

difference in land use between the options, there are some objectives that apply to Option 1 and these are provided under a separate heading.

b. Objectives

(1) Development Objectives

- Create a high quality, luxury, mixed use hotel and/or residential building of significant architectural interest that offers a unique experience for guests and/or residents while promoting an active pedestrian environment with access to uses in the area.
- Support regional mobility goals by locating higher density uses along a major transit corridor, thereby reducing vehicle trips and infrastructure costs.
- Maximize development on a site with a well-designed mixed-use project that is compatible with surrounding high density development.
- Encourage pedestrian activity by introducing new dining, retail, and lodging uses adjacent to Westwood Village and within close proximity to a university and an art museum.
- Support the diverse array of services and dining needs of the community by developing a project with a restaurant and ground floor retail space.
- Provide a physical and visual transition between the high rise Wilshire Boulevard corridor and Westwood Village with development that complements Wilshire Boulevard's high-rise development and respects Westwood Village's low-rise buildings.

(2) Design Objectives

- Create an architecturally significant building that fits the unique shape of the site thereby creating a permanent landmark structure at a prominent intersection that serves as the western entryway to Westwood Village.
- Encourage pedestrian activity by enhancing the pedestrian scale along Gayley Avenue through the development of ground level retail uses and providing enhanced sidewalks and connections.
- Incorporate sustainable elements such as mechanical and electrical systems that meet LEED silver level, lighting controls and use of natural light to reduce the

project's energy consumption, and the reclamation of groundwater from dewatering for irrigation and cooling uses.

- Enhance the visual quality of Gayley Avenue and Wilshire Boulevard through the use of high quality materials and the provision of drought tolerant public landscaping along the street frontage.

(3) Community Plan Objectives

Develop new, high quality housing in proximity to services and facilities to meet the needs of the Westwood Community Plan area's existing residents and projected population of the Plan area.

Develop a project that contributes to and preserves Westwood community's unique commercial, historic, and cultural character.

Develop a high quality, mixed use project with a distinctive character that is compatible with the intensity of development along the Wilshire corridor and the pedestrian character of the Westwood Village.

(4) Economic Objectives

- Develop a project that will generate additional annual sales tax revenues through commercial development as well as generate general revenues.
- Maximize the value of the site and ensure support of the future economic vitality of Westwood Village through revitalization of the site and the provision of hotel units and/or residences in conjunction with and adjacent to commercial uses.
- Maintain and enhance the economic vitality of the region by providing job opportunities.
- Accommodate future economic expansion by providing lodging and/or housing within a community that has the necessary infrastructure to support the development.

(a) Option 1 – Hotel/Condominium Project

The following objectives are specific to Option 1:

- Support local and regional visitor-serving needs by providing hotel units, and by providing ancillary facilities, such as meeting facilities for hotel guests.
- Provide a hotel to serve local and regional luxury business needs.

c. Intended Use of the EIR

This Draft EIR is a Project EIR, as defined by Section 15161 of the CEQA Guidelines and, as such, serves as an informational document for the general public and the project's decision-makers. The City of Los Angeles has the principal responsibility for approving the proposed project and, as the Lead Agency, is responsible for the preparation and distribution of this Draft EIR pursuant to CEQA Guidelines Section 21067. This Draft EIR shall be used in connection with all other permits and all other approvals necessary for construction and operation of the proposed project. This Draft EIR shall be used by the City of Los Angeles Department of Planning, Department of Building and Safety, Department of Transportation, and Department of Public Works, including the Bureaus of Engineering and Sanitation, the City of Los Angeles Fire Department and other responsible public agencies that must approve activities undertaken with respect to the proposed project.

Approvals required for the development of The Wilshire Gayley would include, but may not be limited to, the following:

- Certification of an Environmental Impact Report;
- General Plan Amendment to: (1) amend footnote 3 of the Westwood Community Plan Land Use Map to allow an increase in the density and height on the south parcel; and (2) amend the land use designation on the north parcel in the Westwood Community Plan Land Use Map from Community Commercial to Regional Center Commercial;
- Specific Plan Amendment to the Westwood Village Specific Plan and to the Westwood Community Design Review Board Specific Plan to move the boundary north from the project site's midpoint to Lindbrook Drive to exclude the entire site from the Specific Plan so that the entire site is governed by the Westwood Community Plan;
- Zone change from C4-2D-O on the north parcel and [Q]C4-2-O on the south parcel to amend the D Development Limitation on the north parcel and amend the [Q] Condition on the south parcel;
- Height District Change to change Height District 2 and 2D to Height District 4D on both parcels;

- Zoning Administrator Adjustment to eliminate any required setback on the west side of the site;
- Site Plan Review/Design Review;
- Vesting Tentative Tract Map;
- Project Permit Compliance with the Westwood TIMP Specific Plan;
- Conditional Use Permit to allow the sale of alcoholic beverages for on-site consumption;
- Conditional Use Permit to allow a hotel in the C4 zone within 500 feet of an R zone (Option 1 only);
- Approval to permit a portion of the project-parking (up to 226 spaces) to be located off-site (Option 2 only);
- Conditional Use Permit to allow a wireless transmitting facility;
- Encroachment Permits for components including signs and awnings;
- Subsurface vacation of the public right-of-way under the alley and the sidewalk along Gayley Avenue to permit underground parking;
- Highway Dedications along Wilshire Boulevard and Gayley Avenue;
- Demolition permits;
- Grading, excavation, foundation, and associated building permits;
- Haul Routes; and
- Other permits and approvals as deemed necessary.

7. AREAS OF CONTROVERSY/ISSUES TO BE RESOLVED

Potential areas of controversy and issues to be resolved by the City's decision-makers may include those environmental issue areas where the potential for a significant unavoidable adverse impact has been identified. However, the analyses contained in Chapter IV of this EIR conclude that the project would not result in any significant unavoidable impacts. Based on the NOP comment letters, issues known to be of concern in the community include clear understanding and detailed analysis of the two project options; aesthetic views; lighting;

shade/shadow; building setback on the west side of the site; traffic and transit; use of the alley; subsurface vacation; and sewer capacity.

8. PUBLIC REVIEW PROCESS

The City of Los Angeles circulated an NOP for a 30-day review period, beginning August 4, 2008 and ending September 3, 2008. In addition, a public scoping meeting was held on August 19, 2008. The NOP and letters and comments received during the comment period, as well as comment sheets from the public scoping meeting are included in Appendix A of this Draft EIR. In addition, this Draft EIR will be released for a minimum 45-day public comment period. Following the public comment period a Final EIR will be prepared that will include responses to the comments raised regarding the Draft EIR.

9. SUMMARY OF ALTERNATIVES

The Draft EIR examined five alternatives to the proposed project in detail, which include: No Project/No Build Alternative; Development in Accordance With Existing Regulations Alternative – Medical Office; Modified Project Alternative; Hotel Alternative; and Office Alternative. A general description of these Alternatives and a comparative summary of their impacts relative to the project are provided below.

Alternative A: No Project/No Build Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, “in certain instances, the No Project/No Build Alternative means ‘no build’ wherein the existing environmental setting is maintained.” Accordingly, for purposes of this analysis, the No Project/No Build Alternative (Alternative A) assumes that the project would not be approved and no new development would occur within the project site. Thus, the physical condition of the project site would remain as it is today. Thus, the physical conditions of the site would remain as they are today. The north parcel of the site would remain vacant. The south parcel of the site would be occupied by the existing retail building. For purposes of the analysis it is assumed that the approximately 9,873 square foot retail building would be occupied. Site access and parking at the project site would also remain unchanged. Vehicular access to the site would be provided from Gayley Avenue. Parking would be provided on the roof of the building. Accordingly, this Alternative would be equivalent to the conditions on the project site discussed in Section III, General Description of Environmental Setting, for each category analyzed in this Draft EIR.

The No Project/No Build Alternative would not result in new environmental impacts, and overall would result in a reduced level of impact when compared to Option 1 and Option 2. However, under the No Project/No Build Alternative, the majority of the objectives established for the project would not be attained.

Alternative B: Development in Accordance with Existing Regulations Alternative

In accordance with CEQA Guidelines § 15126.6(e)(3)(B), this Alternative represents “the practical result of the project’s non-approval.” In accordance with CEQA Guidelines Section 15126.6(e)(3)(C), this Alternative represents “...what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.”

Based on the existing regulations, the site would be developed with approximately 63,010 square feet of floor area, with approximately 56,500 square feet of medical office use and approximately 6,510 square feet of ground level retail space. The north parcel would be developed with approximately 30,980 square feet and the south parcel would be developed with approximately 32,030 square feet of floor area. The building height would be stepped. The northernmost portion of the building would likely be three stories or approximately 35 to 40 feet in height. The southern portion of the development would be approximately 25 to 30 feet in height.

At a ratio of one parking space per 200 square feet of net floor area, the approximately 56,500 gross square feet (approximately 43,898 net square feet) of space associated with medical office use that would be developed under Alternative B would require approximately 220 parking spaces. In addition, at a ratio of one parking space per 250 square feet of floor area, the approximately 6,510 square feet of retail space would require 26 spaces. The required 246 parking spaces for the medical and retail uses would be provided in a four-level subterranean parking garage. Access to the parking garage would be provided from the alley.

As the building would be located at the property boundary, perimeter landscaping would be provided along the street frontages. As with the project, the sidewalk on Gayley Avenue would be widened to provide a safe pedestrian access. All lighting would be shielded and directed towards the areas to be lit. Signage would comply with the City requirements, including sign regulations in the Specific Plan.

Environmental impacts under Alternative B would be similar or less than those generated by the proposed project, except for visual character and traffic, which would be greater than Option 1 and Option 2 of the project. Under Alternative B, the majority of the project objectives

would not be met and several of the objectives would not be met to the same extent that they would be met by the project.

Alternative C: Modified Project Alternative

The Modified Project Alternative would provide a total of 144 units, 134 of which would be operated as a luxury business hotel. The remaining 10 units would be for sale condominium units. As with the project, the Modified Project Alternative would include amenities such as a business center with meeting rooms, a swimming pool, spa, and a fitness center. In addition, the Modified Project Alternative would include approximately 6,510 square feet of ground floor retail space. Alternative C would include an approximately 9,975 square foot private as opposed to public, restaurant that would be for use by hotel guests and residents and their guests only.

The building would be the same size as the project and would contain approximately 303,709 gross square feet. The Modified Project Alternative would result in a building with 29 stories, approximately 427 feet in height. The building would have the same architecture as the proposed project and would be finished with pre-cast concrete with cast articulation of architectural details. The elevations of the lower floors would have natural stone work accents. Double paned tinted glass would be used on the exterior. Railings, awnings and door hardware would be ornamental bronze, nickel or brass.

As with the project, primary vehicular access for the Modified Project Alternative would be from the alley. A circular driveway and porte-cochere would be provided for drop-off and pick-up for the hotel and residential units. The Modified Project Alternative would require a total of 121 parking spaces. The required 121 parking spaces for Alternative C would be provided on site in a three-level subterranean parking garage.

Landscaping would be provided at the northwest corner of Wilshire Boulevard and Gayley Avenue. In addition, perimeter landscaping would be provided along the Gayley Avenue frontage. The ground level motor court, sidewalk, and upper level terraces would be enhanced by shrubs, vines, and trees. Plant selection would have a focus on drought tolerance and carbon sequestration. As with the project, all lighting would be shielded and directed towards the areas to be lit and away from adjacent uses. Signage would comply with the Los Angeles Municipal Code.

Environmental impacts under Alternative C would be similar or less than the proposed project. Under Alternative C, while the majority of the project's objectives would be attained, the objectives would not be met to the extent that they would be met by the project.

Alternative D: Hotel Alternative

The Hotel Alternative would provide a total of 250 hotel rooms and the same amenities as those that would be provided in the project. In addition, Alternative D would include an approximately 9,975 square foot public restaurant as well as approximately 6,510 square feet of ground floor retail space.

As with the project, the Hotel Alternative building would contain approximately 303,709 gross square feet. The Hotel Alternative would result in a building with 29 stories, approximately 427 feet in height. The building would have the same architecture as the proposed project and the building would be finished with pre-cast concrete with cast articulation of architectural details. The elevations of the lower floors would have natural stone work accents. Double paned tinted glass would be used on the exterior. Railings, awnings and door hardware would be ornamental bronze, nickel or brass.

As with the project, vehicular access for the Modified Project Alternative would be provided via the alley that runs in an east-west direction adjacent to the northern portion of the project site. A circular driveway and porte-cochere would be provided for drop-off and pick-up for the hotel and residential units. The required 234 parking spaces for Alternative D would be provided in a four-level subterranean parking garage. Two bays for loading would be provided at the northwestern corner of the building.

Landscaping would be provided at the northwest corner of Wilshire Boulevard and Gayley Avenue. In addition, perimeter landscaping would be provided along the Gayley Avenue frontage. The ground level motor court, sidewalk, and upper level terraces would be enhanced by shrubs, vines, and mature trees. Plant selection would have a focus on drought tolerance and carbon sequestration. As with the project, all lighting would be shielded and directed towards the areas to be lit and away from adjacent uses. Signage would comply with the Los Angeles Municipal Code.

Alternative D environmental impacts would be similar and less than those generated by the proposed project, with the exception of operational air quality, operational noise, and traffic. Under Alternative D, the majority of the project's objectives would be met although not attained to the same degree as they would be with the project.

Alternative E: Office Alternative

The Office Alternative would be developed in the same building envelope as that of the project. As such, the Office Alternative would result in approximately 287,617 square feet of office space. The building would provide approximately 6,510 square feet of ground level retail

space. The Office Alternative would result in a building with 29 stories, approximately 427 feet in height. The building would have the same architecture as the proposed project and the building would be finished with pre-cast concrete with cast articulation of architectural details. The elevations of the lower floors would have natural stonework accents. Double paned tinted glass would be used on the exterior. Railings, awnings and door hardware would be ornamental bronze, nickel or brass.

As with the project, vehicular access for Alternative E would also be provided via the alley that runs in an east-west direction adjacent to the northern portion of the project site. A circular driveway and porte-cochere would be provided for drop-off and pick-up. Two bays for loading would be provided at the northwestern corner of the building.

As with the project, a four-level subterranean parking garage would be provided on site. The on-site subterranean parking structure could accommodate approximately 260 cars. The additional 224 required spaces would be provided off-site.

Landscaping would be provided at the northwest corner of Wilshire Boulevard and Gayley Avenue. In addition, perimeter landscaping would be provided along the Gayley Avenue frontage. The ground level motor court, sidewalk, and upper level terraces would be enhanced by shrubs, vines, and trees. Plant selection would have a focus on drought tolerance and carbon sequestration. As with the project, all lighting would be shielded and directed towards the areas to be lit and away from adjacent uses. Signage would comply with the Los Angeles Municipal Code.

Environmental impacts under Alternative E would be similar and less than the proposed project impacts, except for operational air quality, operational noise, traffic, and schools (compared with Option 1). The majority of the project's objectives under Alternative E would be attained but not to the same degree as under Option 1 and Option 2.

Environmentally Superior Alternative

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

In accordance with the CEQA Guidelines requirement to identify an environmentally superior alternative other than the No Project/No Build Alternative, a comparative evaluation of the remaining alternatives indicates that the Modified Project Alternative would be the environmentally superior alternative. Alternative C would reduce more of the project impacts than any of the other remaining alternatives. This Alternative would result in less daily trips, less operational air quality emissions, and less operational noise impacts compared with Option 1 and Option 2. However, under the Modified Project Alternative, the majority of the project objectives would not be met to the same extent as with the project.

10. SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

Section IV of this Draft EIR provides analyses of the potential environmental impacts of the proposed project. Further discussion of the impacts is provided below.

a. Aesthetics/Visual Resources

As Option 1 and Option 2 would result in the same building dimensions, landscaping, and other physical features, the following discussion is applicable to both of these options.

(1) Visual Character

(a) Construction

Construction activities frequently disrupt the general order and aesthetic character of an area. Although temporary in nature, construction activities may cause visual blight. Construction of the project would require redevelopment of sidewalks; excavation; hauling, including export of excavated materials; and construction of below-grade foundations, the building itself, and landscaping. Construction activities would include the storage of equipment and materials and placement of a crane or cranes during the construction of the upper levels of the building.

Due to the temporary nature of construction, these activities would not permanently degrade or modify the existing aesthetic image of Westwood, or generate substantial long-term contrast with the visual character of the surrounding area. Construction of the project would begin in approximately the third quarter of 2009 and would end in 2012. Given the vacant and/or unoccupied nature of the existing project site, construction would not cause the loss of unique visual resources or prominent existing features and would not substantially alter, degrade, eliminate or generate substantial long-term contrast with the visual character of the surrounding area. Therefore, visual quality impacts associated with construction would be less than significant.

(b) Operation**(i) Aesthetic Value and Viewsheds****Wilshire Boulevard High-Rise Corridor**

The predominant high-rise structures of Wilshire Boulevard, which are visible from a great distance throughout the Los Angeles Basin, create a distinctive component of the Westwood urban skyline. As the project site is currently vacant, with the exception of an existing low-rise commercial building, the project's proposed 29-story tower would result in greater density and building mass at the project site than under existing conditions. West of Glendon Avenue, nine high-rise commercial buildings ranging from 17 to 29 stories distinguish Wilshire Boulevard.

The high-rise nature of the proposed project would be consistent with other high-rise commercial and residential buildings along Wilshire Boulevard, west of Glendon Avenue, including The Tower, the Oppenheimer Building, Wilshire at Westwood, the Wilshire Federal Building, Hotel Palomar, the 10790 Wilshire Building, Westwood Center, and the UCLA Wilshire Center, and others. The proposed project would also be consistent with the corridor of condominium towers lining both sides of Wilshire Boulevard to the east of Glendon Avenue and designated as the "Wilshire-Westwood Scenic Corridor." With respect to the Wilshire Boulevard high-rise corridor, the proposed project would contribute features that enhance the area's valued aesthetic.

Westwood Village, which is characterized by street-facing, low-rise commercial uses, adjoins the project site to the north. The 45-foot-high, three-story Westwood Village Square retail center is located to the north of the project site, north of the Lindbrook Avenue alignment on the west side of Gayley Avenue. The massing of the northern portion of the proposed structure would be consistent with the massing of neighboring commercial buildings. The high-rise, south portion of the proposed structure would be consistent with the massing of buildings along the Wilshire Boulevard corridor. The contrast of high- and low-rise structures would be consistent with the existing pattern of development along the Wilshire Boulevard corridor, in which high-rise buildings ranging up to 29 stories are located in close proximity to one- and two-story buildings. As with the project, the high-rise buildings along Wilshire Boulevard are located generally to the south of the Lindbrook Avenue alignment. The low-rise Westwood Village is located primarily to the north of the Lindbrook Avenue alignment. An exception is the approximately 300-foot-high, 1100 Glendon building, located just north of Lindbrook Drive.

With respect to adjacent low-rise development, the project's northern tower wall would be separated from the neighboring three-story building by a deep, 75-foot setback of the project's tower wall from the north boundary, terracing along the building's north façade to create

additional setbacks at upper stories, and the 20-foot-wide public alley. Terracing would reduce the project's building profile at the upper stories and would reduce the overall sense of mass and contrast between the proposed project and the adjacent three-story building located to the north. The proposed tower façade would also be separated from the building to the north by the motor court and porte-cochere. The porte-cochere deck would provide a buffer between the hotel/residential tower and commercial uses in Westwood Village.

The north radius of the building's porte-cochere would extend, at its farthest point, 15 feet into the 20-foot alley right-of-way, leaving a clearance of five feet between the farthest curved edge of the porte-cochere and the south wall of the off-site, three-story commercial building. The porte-cochere would not exceed 40 feet in height and, as such, would be consistent with building heights and development scale within the Westwood Community Plan. Except where it adjoins the tower, the porte-cochere would be an open structure allowing natural light to pass through three sides.

Scenic Resources

Wilshire Boulevard to the east of Glendon Avenue is designated as a Scenic Highway. However, this designation does not extend to the project site. Therefore, project would have no impact with respect to any historical buildings or other scenic resources in the vicinity of the designated scenic highway.

Views Toward the Project Site

- The proposed project would add a 29-story, approximately 427-foot-high building on a partially vacant site occupied by an existing single-story building. The proposed tower would be highly visible from other surrounding areas, although existing high-rises along Wilshire Boulevard partially block views of the project site from Midvale Avenue, to the south of Wilshire Boulevard; and Wilshire Boulevard, to the west of Gayley Avenue. However, it is expected that the proposed tower would be partially visible from some sections of Midvale Avenue and the upper stories would be visible from view points along westbound Wilshire Boulevard. As the current surrounding environment exhibits a combination of high-rise and low-rise development, the project would be consistent with the character of the existing environment. Impacts with respect to views toward the project site would be less than significant.

Views Across the Project Site of the Wilshire Boulevard High Rise Corridor

In the project vicinity, public views of the Wilshire Boulevard skyline within the same view fields as the proposed project are available from Veteran Avenue across the UCLA parking lot, from the Los Angeles National Cemetery, from westbound Wilshire Boulevard (west of the

project site), and from southbound Gayley Avenue (north of the project site). Wilshire Boulevard's high-rise skyline would be visible in the project's view field and background. Depending on the view location, the proposed project would have a varying effect on the vista created by the cluster of high-rise buildings along Wilshire Boulevard, including the potential to block views of some high-rise buildings within the Wilshire Boulevard corridor. Although some obstruction of views of existing high-rise buildings along Wilshire Boulevard would occur, the exchange of existing views of a corridor of high-quality, high-rise buildings with future views of the corridor with an additional high-quality, high-rise building would be complementary and would maintain the context of the view. As the high-rise corridor constitutes the visual resource, rather than individual buildings, and the proposed project would continue and complement the high-rise vista along the corridor, the project would have a less than significant impact with regard to views across the project site.

Focal Views of Designated Culturally and Architecturally Significant Buildings

All of Westwood Village's designated architecturally and historically significant buildings are located to the north of Lindbrook Drive. Due to the low-rise character of the designated architecturally and historically significant buildings, the flat terrain, and density of Westwood Village, none of the architecturally and historically significant buildings are located within the same line-of-sight or view field as the proposed project. As no designated buildings are visible across the project site, the proposed project would not block any focal views of Westwood Village's designated architecturally or historically significant buildings across the project site.

Panoramic views of the Los Angeles National Cemetery

The project is located in the vicinity of the Los Angeles National Cemetery and has the potential to block any panoramic views of the National Cemetery that may be available across the project site. However, as the Los Angeles National Cemetery and project vicinity are characterized by relatively flat terrain, any west-facing views of the National Cemetery from Gayley Avenue or Lindbrook Drive are currently blocked by the existing, approximately 30-foot-high single-story commercial building on the project site and adjacent buildings to the west of the project site, including the 22-foot-high, two-story UCLA services building located in UCLA's Parking Lot 36. Northwest-facing public views of the National Cemetery across the project site from Gayley Avenue are currently blocked by the existing three-story UCLA Library fronting Kinross Avenue. Therefore, the project would not block views of the National Cemetery from the adjacent Gayley Avenue.

No existing west-facing views of the National Cemetery are available from west-facing Wilshire Boulevard, east of Gayley Avenue. From Wilshire Boulevard to the east of Gayley

Avenue, existing buildings along the north side of Wilshire Boulevard block public views of the project site and any uses beyond the project site, such as the National Cemetery. East-facing public views of the National Cemetery from Wilshire Boulevard or from I-405 to the west of the project site would not be blocked by the project, as the project site is located in the background of the cemetery. Therefore, the project would not cause any new view blockage of the National Cemetery from Wilshire Boulevard and would have a less than significant impact with respect to views of the Los Angeles National Cemetery across the project site.

Panoramic Horizon or Mountain Views

High rise towers along the Wilshire Boulevard high rise corridor, depending on weather conditions, are visible from many areas throughout the western portion of the Los Angeles Basin, including the I-405 Freeway, Century City, the Getty Center and other locations in the Hollywood Hills and Baldwin Hills. Due to the distance of such view locations, the proposed project would represent a structural component in the quality of the Wilshire Boulevard high rise corridor skyline and would contribute to the variety and interest of panoramic/horizon views of the skyline and would have a less than significant impact with respect to this visual resource. Some public panoramic views of the Hollywood Hills are available from north-facing streets in the project area, including Veteran Avenue. However, due to the flat terrain along north-facing public streets that have open views of the hills in the project vicinity, and the distance of the hills, the hills are barely visible above the horizon. No views of the Hollywood Hills are currently available across the project site from north-facing streets. Also, panoramic public views toward the north from south of Wilshire Boulevard are substantially blocked by high-rise development along Wilshire Boulevard. As views of the panoramic horizon or mountains would not be visible in the background of the proposed building, the proposed project would not block views of this scenic resource and the project would have a less than significant impact with respect to views of the horizon or distant mountains across the project site.

(ii) Architecturally and Culturally Significant Buildings in Westwood Village

The project site contains no buildings of cultural or architectural importance that would be removed for the proposed development. In addition, the proposed project would not affect the architectural integrity of any of Westwood's designated architecturally and historically significant buildings, since no designated buildings are located within close proximity to the site. In addition, due to the low-rise character of the designated buildings, the flat terrain, and density of development in Westwood Village, Westwood Village's architecturally and historically significant buildings are not located within a common view field with the proposed project. As with other high-rise buildings along Wilshire Boulevard, the proposed project would be located to the south of the Lindbrook Drive alignment and would not encroach into the historical or architectural core of Westwood Village.

(ii) Policy and Regulatory Compliance

General Plan Framework

The project would be consistent with the aesthetic policies set forth in the Urban Form and Neighborhood Design section of the City's General Plan Framework. Primary aesthetic goals of the General Plan Framework are intended to promote pedestrian activity and to provide a quality experience for the City's residents. The proposed project would be consistent with General Plan Framework policies to promote pedestrian activity and to provide a quality experience for the residents of the City. In addition, the project would provide street-front retail uses at Wilshire Boulevard and Gayley Avenue, as well as providing a widened sidewalk and upgraded landscaping and street trees that would enhance the pedestrian scale of the area and increase overall pedestrian activity. Enhanced sidewalks and visual features, such as retail display windows and attractive architectural detailing along the project's east wall would also enhance the pedestrian environment and would encourage pedestrian activity along Gayley Avenue between Wilshire Boulevard and Westwood Village. Increased use of Gayley Avenue as a pedestrian link between Wilshire Boulevard and Westwood Village would further support retail/restaurant/entertainment uses in Westwood Village that rely on pedestrian activity. In addition, in conformance with design policies of the General Plan Framework, the proposed project would proactively set forth specific planning goals for an existing underutilized parcel, including the vision for a landmark quality building at the gateway to both the Wilshire-Westwood Regional Center and Westwood Village. As the project would be consistent with the Framework's Urban Form and Neighborhood Design policies, it would be consistent with the Visual Quality/Aesthetics threshold standard regarding applicable guidelines and regulations with respect to the General Plan Framework.

Westwood Community Plan

The proposed project would be consistent with Westwood Community Plan policies to achieve harmony with the surrounding neighborhood and a stable environment with a pleasant and desirable character, and to distinguish Westwood from adjoining communities. The proposed project would be consistent with the applicable Westwood Community Plan policies that support the objectives and purposes of the Urban Design and Landscaping Guidelines. The proposed project would be consistent with policies that require the use of high quality, complementary building materials; the use of architectural features to break up long, flat building facades; screening of mechanical and electrical equipment and trash collection areas from public view; maximized retail and commercial service uses along street frontages; front pedestrian entrances; minimal pedestrian/vehicular conflicts; location of exterior wall close to the front line; attractive landscaping and street trees; adherence to commercial signage standards; concealed parking and parking structure entrance; and pedestrian lighting. As the proposed project would be consistent with the Community Plan's Urban Design and Landscaping objectives, the project would be

consistent with the Visual Quality/Aesthetics threshold standard regarding applicable guidelines and regulations with respect to the Westwood Community Plan.

Westwood Village Specific Plan

The proposed project includes a request to remove the north parcel from the boundaries of the Westwood Village Specific Plan area. With the approval of the change in boundary of the Specific Plan area, the Specific Plan would not govern the site. However, given that the site is currently located within the boundaries of the Specific Plan area, the following provides a brief analysis of project consistency with the Plan policies. The portion of the project located on the north parcel would not be entirely consistent with the Design Review Criteria of the Specific Plan in that the proposed 427-foot, 29-story building would not meet the 55-foot height limitation. However, the building is stepped back in the “Specific Plan” portion of the site so that only about 10 percent of the footprint in that area would exceed the 55-foot limit. In addition, the porte-cochere in the north portion of the project site would not exceed 40-feet in height and would be consistent with the height of the adjacent 45-foot-high commercial uses directly to the north. Proposed development within the north parcel would be consistent with Specific Plan policies to locate primary entrances along the ground floor of the building frontage.

The inconsistency of the proposed development in the north parcel with the Westwood Village Specific Plan, however, would not result in any adverse physical impacts that would otherwise be prevented by the Specific Plan, including excessive shading of residential or outdoor uses; disruption of the low-rise character of Westwood Village, which is located to the north of Lindbrook Drive; or impact on designated culturally and architecturally significant resources within Westwood Village. As the inconsistency of the proposed project with the Westwood Village Specific Plan would not result in a significant physical impact that would be avoided with compliance with the Westwood Village Specific Plan, the inconsistency with the Westwood Community Design Review Board Specific Plan would be less than significant.

Westwood Community Design Review Board Specific Plan

With the approval of the change in boundary of the Specific Plan area, the Westwood Community Design Review Board Specific Plan would not govern the site. However, given that the site is currently located within the boundaries of the Specific Plan area, the following provides a brief analysis of project consistency with the Plan policies. Development within the north parcel would be consistent with shading and other aesthetic criteria. Proposed development within the north parcel would not shade any residential uses for more than two hours between the hours of 9 A.M. and 3 P.M. on December 21 and all ventilation, heating or air conditioning ducts, tubes, equipment, or other related appurtenances are adequately screened from public view. Proposed development in the north parcel would be consistent with the Design Review Board Specific Plan’s criterion regarding compatibility with the surrounding

buildings in terms of design, massing, and architectural integrity. Although the portion of the proposed tower located in the north parcel would exceed the massing (height) of the low-rise commercial buildings within the existing Westwood Village Specific Plan north of the Lindbrook Drive alignment, the project would be consistent with the high-rise buildings along Wilshire Boulevard that occur south of the Lindbrook Drive alignment. Also, the over-height portion of the proposed building would only occupy 10 percent of area to which the Specific Plan height limitation would be applicable. However, as the development within the north parcel would be located entirely south of the Lindbrook Drive alignment, the project would be consistent with the pattern of high-rise development occurring south of Lindbrook Drive and, therefore, compatible with surrounding buildings. Proposed development within the north parcel would be consistent with the Design Review Board Specific Plan's criterion regarding the aesthetic properties of parking structures.

However, the proposed development within the north parcel would not be consistent with the Design Review Board Specific Plan criterion that all proposed structures conform to the provisions contained within any applicable specific plans or design guidelines, since development within the north parcel would not be consistent with 40-foot height limit of the Westwood Village Specific Plan. Development within the north parcel would also not be consistent with the Design Review Board Specific Plan criterion to consider conformity with the Los Angeles Municipal Code, since it would exceed the maximum 2.0:1 FAR "Development Limitation" of the existing C4-2D zone. However, zoning inconsistencies would be addressed through a height district change from Height District 2D to Height District 4D.

The proposed change to Height District 4D would resolve all zoning inconsistencies and respective criterion of the Design Review Board Specific Plan. The proposed project would represent a unique and high-quality building that would activate and improve the quality of the Gayley Avenue street front, while incorporating features that minimize or avoid physical impacts, such as tiering of stories and building setback from uses to the north. No significant physical impacts addressed by the Westwood Community Design Review Board Specific Plan (such as off-site shading of residential uses or unacceptable appearance) would occur.

Los Angeles Municipal Code

The project site's north parcel is zoned C4-2D-O. The "D" indicates a Development Limitation in the LAMC and requires consistency with the Westwood Village Specific Plan. As the Specific Plan designates the north parcel as a "receiver site," with a floor area ratio FAR of 3 to 1, the overall FAR of the project would exceed this limitation. No height limitation is designated for the north parcel in the Westwood Specific Plan. However, under Westwood Community Plan Map Footnote 5, the location of the north parcel within the Westwood Village Specific Plan indicates a building height of 40 feet that may be increased to 55 feet, with transfer from other sites and Director of Planning approval. The proposed General Plan and Westwood

Village Specific Plan amendments to remove the north parcel from the jurisdiction of the Westwood Village Specific Plan, would resolve the inconsistency with the criterion requiring compliance with the Specific Plan.

The project site's south parcel is zoned [Q]C4, Height District 2, Community Commercial-Qualified Classification. The project's overall FAR would not be consistent with the Height District 2 designation, which has no height limit but restricts development to a 6 to 1 FAR. The project would not be consistent with the south parcel's [Q] conditions that restrict building height to 31 feet in the northern two-thirds of the south parcel. The proposed change to Height District 4D over the project site would resolve all zoning inconsistencies and respective criterion of the Design Review Board Specific Plan. As development would not proceed in the absence of the proposed amendments, no impact with respect to the LAMC's height or density requirements would occur.

(2) Light and Glare

(a) Construction

Construction activities would occur primarily during daylight hours and any construction-related illumination would be used for safety and security purposes only, in compliance with LAMC Section 12.21A5(k) and light intensity requirements. Construction lighting also would last only as long as needed in the finite construction process. No residential uses or other sensitive receptors are located in the immediate vicinity. Light spillage and glare would be reduced through the implementation of the LAMC and would be less than significant at the nearest line-of-sight residential uses along Veteran Avenue to the north. Residential uses south of Wilshire Boulevard would be generally screened from the project site by existing high-rise buildings and would not be affected by construction lighting. Therefore, artificial light impacts associated with construction would be less than significant.

Construction activities are not anticipated to result in flat, shiny surfaces that would reflect sunlight or cause other natural glare. Therefore, reflection associated with sunlight and natural glare would be less than significant during construction.

(b) Operation

(i) Artificial Light

The project site is screened from view from existing residential neighborhoods (sensitive uses) along Veteran Avenue and east of Tiverton Avenue by intervening buildings in a highly urbanized environment. The project site would also be primarily screened from residential uses

to the south of Wilshire Boulevard and to the east of Westwood Village by intervening buildings. The Veteran's Health Services Facility to the west of I-405 may also be sensitive to light and glare. However, this use is separated from the project site by considerable distance, the Federal Building, and the intervening freeway. The project would introduce more lighting to the site than under existing and prior conditions. New light sources associated with the project would include light spillage from retail display windows along Gayley Avenue, illuminated building identification and retail business signs, architectural and landscape lighting, security and wayfinding lighting provided at vehicle entry points and areas of circulation, exterior lighting at building entrance areas, and pedestrian and other security lighting along Gayley Avenue. Other sources include interior light spillage from hotel rooms, onsite residences, and the restaurant/bar on the fourth floor. Exterior light spillage could occur from the porte-cochere roof's glass-bottom swimming pool and deck.

Lighting for architectural highlighting would be designed to be dimmable to optimize its effects architecturally and on the community. Lighting from signage would not exceed LAMC illuminated sign regulations, which allow no sign to be arranged and illuminated in such a manner as to produce a light intensity greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property (Division 62, Sec. 91.6205.13) and no exterior light may cause more than two foot-candles of lighting intensity or generate direct glare onto exterior glazed windows or doors, porch, deck, or balcony in any residential use (Chapter 9, Article 3, Sec. 93.0117(b)). In addition, as illuminated signs would be similar to signage on existing commercial buildings, the project would not create a singular, disruptive glare source. The pattern of interior light spillage from upper stories would be similar to off-site residential uses, as interior lighting ceases when guest and residents retire for the night. Therefore, the increase in ambient lighting would not interfere with activities in nearby residential neighborhoods. With the implementation of project design features and applicable LAMC regulations, lighting associated with the project would be consistent with the character of the off-site areas surrounding the project and would not interfere with the performance of an off-site activity from any residential use. Impacts attributable to project-induced artificial lighting would be less than significant.

(ii) Glare

Reflected sunlight from any shiny surface could interfere with the performance of an off-site activity, such as the operation of a motor vehicle. The proposed building would be prominently visible from east- and westbound Wilshire Boulevard. As the sun is always located less than 90 degrees above the south horizon, it is located to the south of any viewer in the northern hemisphere. Glare from reflected sunlight generally occurs when the sun is behind or to the side of the viewer and is reflected off a shiny object in the viewer's line-of-sight. As such, glare from reflected sunlight occurs only to a viewer facing toward the north, west, or east. As Wilshire Boulevard travels in a northeasterly direction through Westwood, glare from sun

reflection can occur with respect to eastbound drivers on Wilshire Boulevard. Any reflective surface on the proposed building would have the potential to reflect sunlight on eastbound drivers on Wilshire Boulevard.

(4) Shading

(a) Winter Solstice

Shade sensitive uses in the area include sidewalk cafes and residential areas located to the north of Weyburn Avenue and to the east of Tiverton Avenue. During the winter solstice, shadow would extend to the north of Kinross Avenue at its farthest point and would overlap shadows from existing buildings. No residential uses to the north would be shaded. Shadows would decrease in length during the morning hours as they move increasingly to the east. Shade sensitive uses affected by the project's morning shadow include outdoor restaurants on both sides of Gayley Avenue that are not currently shaded. An outdoor restaurant at the east side of Gayley Avenue would be shaded at approximately 10:00 A.M. until approximately 11:00 A.M. and an outdoor restaurant on the west side of Gayley Avenue would be shaded from approximately 10:45 A.M. to 11:45 A.M. Although the proposed project would cast new shadows on outdoor eating establishments and other commercial uses on Kinross and Gayley Avenues between 9:00 A.M. and 12:00 P.M., due to the movement of the sun, no single use would experience new shading for more than three consecutive hours (the threshold criterion).

Beginning at approximately 12:15 P.M., the shadow from the proposed project would reach the north side of Lindbrook Drive near Gayley Avenue. Shading of the north side of Lindbrook Drive, between Gayley Avenue and Westwood Boulevard would end at approximately 2:15 P.M. Depending on the location along the north side of Lindbrook Drive new shading of this street section would last up to approximately two hours, particular for the street section located nearest Gayley Drive. Shade sensitive uses along this block include outside dining areas.

Shading of the south side of Lindbrook Drive would begin at approximately 12:30 P.M. and last until after 3:00 P.M. Outdoor dining, a shade sensitive use, is located along the south side of Lindbrook Drive. Depending on the distance of a use from Lindbrook Drive, shading of this street segment would last up to two and one-half hours prior to 3:00 P.M. However, much of the project's shadow would overlap shadows from the 360-foot-high Helio Building on the south side of Wilshire Boulevard. As no new shading would occur for more than three consecutive hours between 9:00 A.M. and 3:00 P.M., shade impacts on this area would be less than significant.

Prior to 2:00 P.M., the shadow from the proposed project would reach existing residential uses along and to the east of Glendon Avenue. By 3:00 P.M., the project's shadow would extend

to Weyburn Avenue, to the northeast of Glendon Avenue. However, the longest shadows have the shortest duration and this area would experience less than one hour of shading prior to 3:00 P.M. Also, the project's late afternoon shadow would coincide with shadows from an existing high-rise building, just to the southwest in the Glendon residential use. As no new shading of any shade sensitive use would exceed the threshold criterion of three hours during the winter solstice, the project's shade impacts would be less than significant at this time of year.

(b) Spring Equinox

Shade sensitive uses in the area include sidewalk cafes and residential areas located to the north of Weyburn Avenue and to the east of Tiverton Avenue. The project's 9:00 A.M. shadow would extend across commercial buildings and a section of the UCLA surface parking lot to an area south of Kinross Avenue at its farthest point. No shading of any outdoor restaurant uses would occur during the morning hours. In addition, no residential uses to the north would be shaded. Shadows would decrease in length during the morning hours as they move increasingly to the east. Although the proposed project would cast new shadows on commercial properties on Kinross and Gayley Avenues between 9:00 A.M. and 12:00 P.M., due to the movement of the sun, no single use would experience new shading for more than three consecutive hours.

Beginning at approximately 12:00 P.M., the shadow from the proposed project would reach the north side of Lindbrook Drive near Gayley Avenue. Although much of Lindbrook Drive is currently shaded during the same time period, new shading of the north side of Lindbrook Drive, between Gayley Avenue and Westwood Boulevard would occur along different segments of the block, ending at approximately 2:00 P.M. Shade sensitive uses along this block include outdoor dining areas. However, as new shading would occur for less than three consecutive hours.

Shading by the proposed project would occur along segments of the south side of Lindbrook Drive, between Gayley Avenue and Glendon Avenue, would begin at approximately 1:00 P.M. and would last until approximately 3:00 P.M. Depending on the distance of a use from the project site, shading of any segment or use along the south side of Lindbrook Drive would last a maximum of two hours prior to 3:00 P.M., with the street segments nearest Gayley Avenue experiencing the longest duration (up to two hours). As no new shading would occur for more than three hours between 9:00 A.M. and 3:00 P.M., shade impacts on the south side of Lindbrook Drive would be less than significant.

Prior to 3:00 P.M., the shadow from the proposed project would reach beyond Glendon Avenue, south of Lindbrook Drive. However, the longest shadows have the shortest duration and the area in the vicinity of Glendon Avenue would experience less than one hour of shading prior to 3:00 P.M. Any new shadow that may reach shade-sensitive residential uses to the east of Glendon Avenue would overlap existing shadows from other buildings. As no new shading of

any shade sensitive use would exceed the threshold criterion of three hours during the spring equinox, the proposed project's shade impacts would be less than significant at this time of year.

(c) Summer Solstice

Shade sensitive uses in the area include sidewalk cafes and residential areas located to the north of Weyburn Avenue and to the east of Tiverton Avenue. The project's 9:00 A.M. shadow would extend into the UCLA surface parking lot, which is not a shade sensitive use. No shading of any outdoor restaurant uses would occur during the morning hours. No residential uses, as to the north would be shaded. Shadows would be minimal through the morning and early afternoon hours. The project's shadow would remain to the south of Lindbrook Drive through the afternoon period and no residential areas to the east of the project site would be shaded. At approximately 2:00 P.M., shadows would move to the east across Gayley Avenue and would shade the west side of the building on the east side of Gayley Avenue.

Prior to 5:00 P.M., the shadow from the proposed project would reach across Wilshire Boulevard and would shade commercial uses at the south side of Wilshire Boulevard. Most of the new shadow would occur within the street right-of-way, with much of the shading of buildings overlapping with existing shadows. No residences or other sensitive uses would be affected by new shadows during the summer solstice. As no sensitive uses would be shaded during the summer solstice for four hours or more (the threshold criterion), the proposed project's shade impacts would be less than significant during the summer solstice.

(d) Fall Equinox

Shade sensitive uses in the area include sidewalk cafes and residential areas located to the north of Weyburn Avenue and to the east of Tiverton Avenue. The project's 9:00 A.M. shadow would extend across commercial buildings facing the UCLA surface parking lot to an area south of Kinross Avenue at its farthest point. No shading of any outdoor restaurant uses would occur during the morning hours. No residential uses to the north would be shaded. Shadows would decrease in length during the morning hours as they move increasingly to the east. Although the proposed project would cast new shadows on commercial properties on Kinross and Gayley Avenues between 9:00 A.M. and 1:00 P.M., due to the movement of the sun, only the commercial buildings nearest the project site would experience new shading up to three consecutive hours. No new shading would occur along the public sidewalk adjacent to the project site or to any sensitive uses during the 9:00 A.M. to 1:00 P.M. time period.

Beginning at approximately 2:00 P.M., the shadow from the proposed project would reach the north side of Lindbrook Drive near Gayley Avenue. Shading of the north side of Lindbrook Drive, between Gayley Avenue and Westwood Boulevard, would occur along different segments

of the block, ending at approximately 4:00 P.M. Shade sensitive uses along this block include outdoor dining areas. However, new shading of any single segment of north side of Lindbrook Drive would not occur for more than an hour.

Shading of the south side of Lindbrook Drive would begin at approximately 3:00 P.M. Outdoor dining, a shade sensitive use, is located along the south side of Lindbrook Drive. As outdoor dining areas are located along the north side of an existing two-story building, much of the area along the sidewalk is currently shaded during the earlier afternoon hours. Existing sidewalk shade from the building diminishes in the later afternoon as the sun moves to the west. Depending on the distance of a use from the project site, shading of any segment or use along the south side of Lindbrook Drive would last a maximum of two hours prior to 5:00 P.M., with the street segments nearest Gayley Avenue experiencing the longest duration (up to two hours). At 5:00 P.M. new shade from the project site would reach the proximity of Glendon Avenue. No new shading of any sensitive uses would occur for more than four hours during any part of the day. Therefore, shade impacts would be less than significant during the fall equinox.

(5) Cumulative Impacts

Of the 23 related projects in the project's study area, eight projects could cumulatively contribute to aesthetic impacts. Of the eight related projects, three are commercial or mixed-use projects located within Westwood Village and five are located within the Wilshire-Westwood Scenic Corridor, which is entirely residential. No related projects are located within Westwood's Wilshire Boulevard high-rise corridor to the west of Glendon Avenue, a primarily commercial area. Related Projects No. 1 and 3 are low-rise retail uses that would be constructed along Gayley Avenue and Related Project No. 2 is a mixed-use project containing 350 residential units and 50,000 square feet of retail space at 1120 Glendon Avenue. The low-rise and retail projects associated with Related Projects No. 1 and 3 would continue the existing character of Westwood Village and would not cumulatively contribute to the proposed project's aesthetic impacts. Related Project No. 2, an existing high-rise building was recently completed and was taken into consideration in the evaluation of existing conditions. This related project is, therefore, not included in the evaluation of cumulative aesthetic impacts. In addition to these eight projects, no related projects are located near enough to the project to cumulatively contribute to light/glare or shade impacts.

Related Projects No. 6, 7, 11, 14, and 19 would be constructed within, and influence, the visual quality of the Wilshire-Westwood Scenic Corridor. As the proposed project would contribute to the dramatic effect of high-rise buildings lining Wilshire Boulevard, the visual impact of the related projects on the high-rise corridor would have a beneficial cumulative impact on the corridor when combined with the proposed project.

Although the proposed project could be located within the same view field as the eight related projects, when viewed from a distant public viewing location, such as the Hollywood Hills, the proposed project would not be located within the same line-of-sight as the related projects, when viewed from surrounding public streets or open space. Where the related projects are visible in the same view field, they are sufficiently removed so as not to cumulatively contribute to any view blockage. As the proposed project would not significantly contribute to view blockage from public locations, it is anticipated that the related projects would also not cause view blockage.

Proposed high-rise buildings along Wilshire Boulevard have the potential to increase glare from reflected sunlight along Wilshire Boulevard during the afternoon hours. However, since the project's potential glare impacts would be reduced to a less-than-significant level through the proposed mitigation measure, and similar glare reduction features are expected to be implemented for the respective related projects, any cumulative increase in glare potential would be less than significant.

The proposed project would incrementally increase shade within the Wilshire Boulevard high-rise corridor and Westwood Village area, but would not significantly shade any sensitive use. Related projects would cast a variety of shadows in the vicinity of Wilshire Boulevard. Although related projects would increase shading along the Wilshire-Westwood Scenic Corridor in a residential area characterized by existing dense high rise development, it is expected that most of the shading would be overlapped by existing shadows and that new shading would be limited. Additionally, the five related projects are located to the east of Malcolm Avenue and would not shade the same areas as the proposed project. As shadows from the related projects would not shade contiguous areas to the proposed project, shade impacts would not be cumulatively significant.

(6) Mitigation Measures

With the implementation of the project's architectural and landscape design features, visual quality impacts would be less than significant. In addition, there are no significant view obstruction impacts. With the implementation of the project's design features and existing LAMC signage and lighting regulations, no significant artificial light impacts have been identified. However, to ensure that the project meets the specific standards where significant impacts have not been identified, Mitigation Measures A-1 through A-6 are recommended. Mitigation Measure A-7 addresses the project's potentially significant impact associated with reflected sunlight on eastbound Wilshire Boulevard. Mitigation Measure A-8 requires that signage is integrated into the architecture of the building.

Mitigation Measure A-1: The Applicant shall ensure through appropriate postings and daily visual inspections that no unauthorized materials are posted on any

temporary construction barriers or temporary pedestrian walkways, and that such temporary barriers and walkways are maintained in a visually attractive manner throughout the construction period.

Mitigation Measure A-2: All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect to the satisfaction of the City of Los Angeles Department of Planning.

Mitigation Measure A-3: All new street and pedestrian lighting within the public right of way shall be approved by the Bureau of Street Lighting and shall be tested in accordance with the requirements of the Bureau of Street Lighting.

Mitigation Measure A-4: All new street and pedestrian lighting shall be shielded and directed away from any off-site uses, so that the light source cannot be seen from adjacent residential properties.

Mitigation Measure A-5: Prior to the issuance of a building permit, architectural plans for all exterior lighting shall be submitted to the Department of Building and Safety for review to ensure that lighting has low reflectivity in accordance with Illuminating Engineers Society (IES) standards to minimize glare and limit light onto adjacent properties.

Mitigation Measure A-6: Prior to the issuance of a building permit, a final lighting and finish plan shall be submitted to the Director of Planning to ensure consistency with the approved design specifications and conditions.

Mitigation Measure A-7: Prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façade and rooftop shall be submitted for review to the Department of Building and Safety to ensure highly reflective materials are not utilized.

Mitigation Measure A-8: All signage plans shall be reviewed to ensure that signs are designed to be integrated with the architectural character of the building and convey a visually attractive character.

(7) Level of Significance after Mitigation

With the implementation of the proposed mitigation measures and the project's architectural and landscape design features, impacts with regard to aesthetics/visual resources, including view obstruction, light and glare, and shadow, would be less than significant. Although not necessary to mitigate construction or lighting impacts to a less than significant level, the incorporation of the construction and lighting mitigation measures above would ensure that specific design features would be implemented to maintain potential impacts at less than significant levels.

b. Air Quality**(1) Construction****(a) Regional Construction Impacts – Option 1 and Option 2**

Construction of the Option 1 or Option 2 has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers traveling to and from the project site. Mobile source emissions, primarily NO_x, would result from the use of construction equipment such as dozers, loaders, and cranes. During the finishing phase, paving operations and the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds.

Construction phases such as site preparation, excavation, demolition and building finishes would be the same for both options. Construction-related daily maximum regional emissions would not exceed the SCAQMD daily significance thresholds under Option 1 and Option 2 for CO, PM₁₀, PM_{2.5}, VOC, NO_x, or SO_x. Therefore, regional construction emissions resulting from Option 1 or Option 2 would result in a less than significant short-term impact.

(b) Localized Construction Impacts – Option 1 and Option 2

The conservative estimates of on-site daily emissions for NO_x, PM₁₀, PM_{2.5}, and CO for each phase of construction were compared to the applicable screening thresholds, which are based on construction site acreage and distance to closest sensitive receptor. Based on the localized construction emissions thresholds for the project, maximum localized construction emission estimates would not exceed the localized screening thresholds (LSTs) for NO_x CO, PM₁₀ and PM_{2.5} and, therefore, would not result in ambient concentrations that exceed NAAQS. Localized effects from the on-site construction emissions under Option 1 and Option 2 would be less than significant and no detailed dispersion modeling is required.

(c) Toxic Air Contaminants – Option 1 and Option 2

The greatest potential for TAC emissions would be related to diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Because the construction schedule estimates that the phases which require the most heavy-duty diesel vehicle usage, such as site grading and excavation, would last no more than a year, construction of the proposed project would not result in a long-term (i.e., 70 years) substantial source of TAC emissions. As such, project-related toxic emission impacts during construction would be less than significant under both Option 1 and Option 2.

(d) Global Climate Change - Option 1 and Option 2

Construction emissions represent an episodic, source of GHG emissions. Emissions are associated with the operation of construction equipment and the disposal of construction waste. GHG emissions from construction activities were calculated for both project options. To be consistent with SCAQMD guidance, these emissions were amortized over the 30-year lifetime of the project. Construction and operational GHG emissions were considered together to determine significance with regard to global climate. Both Option 1 and Option 2 incorporate GHG – reducing construction measures, which would reduce GHG emissions. Both Option 1 and 2 would thus result in a less than significant impact; and no mitigation is required.

(2) Operational Impacts**(a) Regional Operational Impacts****Option 1 - Hotel/Condominium Project**

Regional air pollutant emissions associated with proposed project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. The project's regional emissions resulting from operation of Option 1 would not exceed the SCAQMD significance thresholds. As a result, regional operational air quality impacts for Option 1 would be less than significant and no mitigation measures would be required.

Option 2 – Condominium Project

Similar to Option 1, regional emissions resulting from operation of Option 2 would also not exceed the SCAQMD significance thresholds. As a result, regional operational air quality impacts for Option 2 would be less than significant and no mitigation measures would be required as well.

(b) Localized Operational Impacts

The SCAQMD recommends an evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of C or worse. None of the project intersections are anticipated to meet these criteria. However, the following intersections were chosen to evaluate potential impacts to nearby sensitive receptors based on highest peak hour traffic volume and proximity to the project site.

- Sepulveda Boulevard and Wilshire Boulevard;
- Gayley Avenue and Wilshire Boulevard.

Option 1 - Hotel/Condominium Project

Under Option 1, no significant impacts would occur at any of the analyzed roadway intersection as a result of project-generated traffic volumes. Thus, Option 1 is not projected to cause any new or exacerbate any existing CO hotspots and stationary-source combustion equipment are projected to have less than significant impacts.

Option 2 - Condominium Project

Under Option 2, no significant impacts would occur at any of the analyzed roadway intersection as a result of project-generated traffic volumes. Thus, Option 2 would not cause any new or exacerbate any existing CO hotspots, and, as a result, impacts related to localized mobile-source CO emissions under Option 2 would be less than significant.

(d) Toxic Air Contaminants

This section evaluates potential impacts to neighboring properties that may result from toxic air contaminants (TAC) emissions associated with long-term operation of the project. In addition, the ambient air environment that currently exists on and around the project site would also impact the residential uses that would be developed as part of Option 1 or Option 2.

Based on a site survey and search on the SCAQMD Facility Information (FIND) database, 25 facilities are located within one quarter-mile of the project site. Since there are no siting guidelines established for emergency diesel generators and natural gas boilers, a conservative assumption of 500 feet was used to determine inclusion in the HRA. Six facilities were identified for further evaluation in the health risk assessment. As both options would introduce residential uses within the CARB siting distances for potential air toxic sources, on-site sensitive receptors may potentially be exposed to high levels of TACs.

Option 1 - Hotel/Condominium Project

Option 1's estimated cancer risks showed a risk of 8.5 E-07 or 0.85 in one million under Option 1, which is below the 10 in one million threshold. Therefore, Option 1 would result in less than significant impacts and no mitigation measures would be required.

With regard to non-carcinogenic impacts, the analysis for Option 1 resulted in a maximum chronic hazard index of 0.006 for the respiratory system toxicological endpoint. Therefore, non-cancer health risks for Option 1 are considered less than significant.

Option 2 - Condominium Project

Option 2's estimated cancer risks showed a risk of 3.4 E-06 or 3.4 in one million, which is below the 10 in one million threshold. Therefore, Option 2 would result in less than significant impacts and no mitigation measures would be required.

With regard to non-carcinogenic impacts, the analysis for Option 2 resulted in a maximum chronic hazard index of 0.018 for the respiratory system toxicological endpoint. Therefore, non-cancer health risks for Option 2 are considered less than significant.

(e) Global Climate Change – Option 1 and Option 2

The proposed project would incorporate several project design features that would reduce the project's emissions profile and would represent improvements above what can be considered "business as usual (BAU)." Analysis of greenhouse gas emissions and global climate change is based on the emission reduction target/threshold of 30 percent below BAU. Analysis of greenhouse gas emissions demonstrates that both project options would achieve GHG emission reductions of more than 30 percent. Therefore, the project would result in a less than significant impact with respect to global climate change.

(f) SCAQMD CEQA Air Quality Handbook Policy Analysis – Option 1 and Option 2

SCAQMD methodologies require that an air quality analysis for a project include forecasts of project emissions in a regional context during construction and project occupancy. The project for both options would result in less than significant impacts with regard to CO, NO₂, SO₂, PM₁₀ and PM_{2.5} concentrations during project construction and operation.

Option 1 and Option 2 are consistent with the types, intensity and patterns of land use envisioned for the site vicinity in SCAG's Growth Management Chapter of the *Regional Comprehensive Plan and Guide* (RCPG). As both options are consistent with the population and employment forecasts for the subregion as adopted by SCAG and since the SCAQMD has incorporated these same projections into the AQMP, it can be concluded that Option 1 and Option 2 would be consistent with the projections in the AQMP. Also, as the project implements the SCAQMD's objective of reducing vehicle miles traveled and their related vehicular air emissions, Option 1 and Option 2 would be consistent with AQMP land use policy.

Overall, the development of Option 1 or Option 2 would not result in short-term regional impacts and would not have a long-term impact on the region's ability to meet State and federal air quality standards. The project would comply with SCAQMD Rule 403 and would implement all feasible measures for control of PM₁₀ and PM_{2.5}. Also, the project would be consistent with the goals and policies of the AQMP for control of fugitive dust. As discussed above, the project's long-term influence would also be consistent with the goals and policies of the AQMP and is, therefore, considered consistent with the SCAQMD's AQMP.

(g) City of Los Angeles Policies

Development of Option 1 and Option 2 at the proposed site location offers the opportunity to provide residential uses and/or lodging in the middle of a highly urbanized regional employment center and does so via the use of existing infrastructure. Either option would locate residences and/or lodging within close proximity to existing regional and local transit facilities. Given the site location, either option would encourage pedestrian activity and would locate people near existing commercial uses that would meet many of the needs of the project's future occupants. Based upon this evaluation, it is concluded that Option 1 and Option 2 would be consistent with City of Los Angeles air quality policies as it implements the air quality goals and policies set forth in the City's General Plan.

Overall, no significant impacts would occur as a result of project development with respect to compatibility with applicable air quality policies as set forth in the City's General Plan Air Quality Element.

(3) Cumulative Impacts

(a) Construction

Of the 23 related projects that have been identified within the project area, there are a number of related projects that have not yet been built or are currently under construction. Since the Applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be entirely speculative.

The proposed project would comply with SCAQMD Rule 403 requirements, and implement all feasible measures. In addition, construction-period mass regional emissions, and emissions associated with the proposed project for development of Option 1 and Option 2 are projected to result in less than significant impacts to air quality. The proposed project would also comply with adopted AQMP emissions control measures. The 23 related projects would also be consistent with developed strategies to reduce criteria pollutant emissions outlined in the

AQMP pursuant to Federal CAA mandates. As such, cumulative impacts to air quality during proposed project construction would be less than significant based on SCAQMD methodology.

Similar to the proposed project, the greatest potential for TAC emissions from each related project would involve diesel particulate emissions associated with heavy equipment operations during grading and excavation activities. Given that the proposed project's contribution to cancer risk from construction activities would be less than significant for Option 1 and Option 2, the project in conjunction with the related projects would not result in a long-term (i.e., 70 years) substantial source of TAC emissions and corresponding individual cancer risk. Thus, TAC emissions from the project in conjunction with the related projects would be less than significant.

(b) Operation

The proposed project would not conflict with or obstruct implementation of the applicable air quality plan under Option 1 or Option 2, which in this case is the AQMP. The project would not result in population and/or employment growth that exceeds growth estimates in the AQMP. The project would comply with all rules and regulations as implemented by the SCAQMD and the CARB, and would conform to the standards and guidelines of the City of Los Angeles General Plan. Therefore, it was determined that the proposed project was consistent with the AQMP. Thus, given the project's consistency with the AQMP, the project's incremental contribution to cumulative air quality effects is not cumulatively considerable, per CEQA Section 15064(h)(3).

As the proposed project is not part of an ongoing regulatory program, the SCAQMD recommends that project specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed in above, peak daily operation-related emissions would not exceed the SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of Option 1 or Option 2 would not result in an addition of criteria pollutants such that cumulative impacts, in conjunction with related projects in the region, would occur. Therefore, the emissions of non-attainment pollutants and precursors generated by operation under Option 1 or Option 2 in excess of the SCAQMD project-level thresholds would be cumulatively less than significant.

With respect to TAC emissions, neither the proposed project nor any of the related projects (which are largely residential, restaurant, retail/commercial, and institutional developments), would represent a substantial source of TAC emissions, which are typically associated with large-scale industrial, manufacturing, and transportation hub facilities. Based on the cumulative screening level analysis conducted, various TAC sources were identified in the vicinity of the project site. These TAC sources however, are not within CARB siting recommendations and would not result in a significant impact.

(c) Global Climate Change

The project is located in a transit-rich area and would be designed and built to achieve the “Silver” level of certification under the US Green Building Council’s (USGBC) Leadership in Energy and Environmental Design (LEED) program. Accordingly, the project has committed to reducing energy demand by 17.5 percent below ASHRAE/IESNA or an equivalent standard, such as Title 24, and would reduce water consumption by 20 percent.

The proposed project, by implementing the project features and GHG reducing measures described above, results in a GHG emission profile that is better (lower) than business as usual. The project’s GHG emissions reductions of 38 and 37 percent compared to the BAU scenario, for Options 1 and 2, respectively, according to SCAQMD guidance, are sufficient to determine that the project would result in a less than significant impact with respect to global climate change.

In addition, the City of Los Angeles is also taking direct action to reduce emissions from all utility users and improve transportation citywide. The project’s features and GHG reduction measures, coupled with the City’s initiatives, make the project consistent with the goals of AB 32. Thus, the project does not result in a cumulatively significant impact. Therefore, no mitigation is required.

(4) Mitigation Measures

With the implementation of the project design features, project construction and operation would result in less than significant impacts with regard to air quality. Although not necessary to reduce impacts to a less than significant level, the below mitigation measures are recommended to ensure that potential impacts during construction and operation would remain less than significant.

Mitigation Measure B-1: All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting and/or use of soil binders could reduce fugitive dust by as much as 55 percent.

Mitigation Measure B-2: The owner or contractor shall keep the construction area sufficiently dampened to control dust caused by construction and hauling, and at all times provide reasonable control of dust caused by wind.

Mitigation Measure B-3: All loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.

Mitigation Measure B-4: All materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.

Mitigation Measure B-5: All earth moving or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.

Mitigation Measure B-6: General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.

Mitigation Measure B-7: The Project Applicant shall apply non-toxic chemical stabilizers according to manufacturer's specifications to inactive construction areas as necessary.

Mitigation Measure B-8: Following daily construction activities, adjacent paved streets found to contain visible soil material that carried over from the project site shall be swept to remove dirt dropped by construction vehicles or mud that would otherwise be carried off by trucks departing the site.

Mitigation Measure B-9: All construction vehicles shall be prohibited from idling in excess of five minutes, both on- and off-site. Signs shall be posted limiting idling to five minutes or less.

Operation (Option 1 and Option 2)

Mitigation Measure B-10: The project shall include air filtration systems for residential dwelling units designed to have a minimum efficiency reporting value (MERV) of 11 as indicated by the American Society of Heating Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2. The air handling systems shall be maintained on a regular basis per manufacturer's recommendations by a qualified technician employed or contracted by the project proponent or successor. Operation and maintenance of the system shall ensure that it performs at or above the minimum reporting value.

(5) Level of Significance After Mitigation

Project development (Option 1 and Option 2) would not result in any significant air quality impacts and the mitigation measures listed above are recommended to ensure that potential impacts during construction would remain less than significant. As a result, air quality impacts during construction and operation of the proposed project would be less than significant.

c. Hazards and Hazardous Materials

(1) Environmental Impacts

(a) Historical Use of Project Site

The north parcel of the site was previously occupied and operated as a gas station. On-site remediation has occurred since the 1990s. In August 2008, the Los Angeles Regional Water Quality Control Board (LARWQCB) issued a letter indicating that the site investigation and corrective action carried out at the site was in compliance with the requirements and that no further action related to the petroleum release(s) at the site is required.

(b) Soil and Groundwater Contamination

Despite remediation efforts, contaminated soil could be encountered during excavation for the subterranean garage for the proposed project. Mitigation Measures C-1 and C-2 are recommended to ensure the proper handling and disposal of contaminated soil that may be encountered during excavation for the proposed project.

There are no discernible impacts to groundwater from the USTs that formerly occupied the site as part of the gas station use. Groundwater monitoring samples across the site and off-site indicate the predominance of below- or near-laboratory-detection-limit (ND or near ND) concentrations of dissolved-phase gasoline-range hydrocarbons. However, the February 2008 groundwater samples revealed the occurrence of dissolved-phase Cr VI and PCE at the site, which are likely the result of local and regional off-site sources.

The groundwater table beneath the site is approximately 40 feet below grade (fbg). Excavation would occur to approximately 40 fbg, or to the approximate level of the groundwater table, to accommodate the four levels of subterranean parking. Therefore, it is likely that dewatering would be required during construction. Discharge of groundwater in conjunction with dewatering would require compliance with a National Pollution Discharge Elimination System (NPDES) Discharge Permit from the RWQCB to discharge water into the storm drain or an appropriate Industrial Waste Discharge Permit issued by the City of Los Angeles to discharge into the sanitary sewer.

With regard to operation, a permanent dewatering system would likely be incorporated below the slab of the lowest level of subterranean parking. Discharge of groundwater in conjunction with dewatering would require compliance with a NPDES Discharge Permit from the RWQCB to discharge water into the storm drain or an appropriate Industrial Waste Discharge Permit issued by the City of Los Angeles to discharge into the sanitary sewer.

(c) Health Risk

A Human Health Risk Assessment (HRA) was conducted to evaluate if hydrocarbon-affected soil would pose a potential risk to future users of the site. As the potential risks to on site commercial workers would be below acceptable risk levels established by the Federal and State Environmental Protection Agencies, and other regulatory entities, no additional remediation, mitigation or engineering controls would be required with regard to vapor intrusion pathway. However, the assessment evaluated the potential for exposure of workers at a commercial or industrial use and did not evaluate the potential for health risks to residents. Given the proposed residential uses on the site, a Supplemental HRA was conducted in November 2008.

Based on the HRA, the potential risks to the hypothetical future on-site residential occupant are below acceptable risk levels as established by EPA, CalEPA, and other regulatory entities. Consequently, no additional remediation, mitigation or engineering controls are required with regard to the vapor intrusion pathway and the potential impact to project occupants is less than significant.

(d) Methane Gas

The site is located in a Methane Buffer Zone. As such, there is a potential for methane and other volatile gases to occur beneath the site and the potential that undocumented wells could be encountered during site development. Site testing of subsurface geological formations shall be conducted at the project site to evaluate the concentration and pressure of methane gas in accordance with LAMC Section 91.7104.1. If the site testing were to indicate that natural gas were present, appropriate precautionary measures should be taken to ensure construction worker safety.

With regard to operation, there is a possibility that hotel guests/residents and on site workers of the project could be exposed to natural gases. As indicated above, site testing of subsurface geological formations shall be conducted at the project site to evaluate the concentration and pressure of methane gas in accordance with LAMC Section 91.7104.1. If determined necessary by the site testing, the Applicant shall develop and implement a methane gas mitigation system for the project in accordance with the applicable requirements of the City Methane Seepage Regulations. Compliance with the City's regulations would reduce operational impacts to a less than significant level. Moreover, should any unrecorded oil wells be found during excavation activities, implementation of Mitigation Measures C-6 and C-7 would ensure treatment in accordance with applicable regulations.

(2) Cumulative Impacts

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

(3) Mitigation Measures

While the proposed project would result in an impact that is less than significant with regard to hazards and although not necessary to reduce impacts to a less than significant level, the following mitigation measures are recommended to ensure compliance with the regulations and that potential impacts remain less than significant.

(a) Construction

Mitigation Measure C-1: During subsurface excavation activities, including borings, trenching, and grading, Cal/OSHA worker safety measures shall be implemented as required to preclude an exposure to unsafe levels of soil contaminants.

Mitigation Measure C-2: Any contaminated soil, groundwater and/or toxic materials encountered during excavation and grading shall be evaluated and excavated/disposed of, treated in-situ (in-place), or otherwise managed in accordance with applicable regulatory requirements. If contamination is discovered during grading activities, grading within such an area shall be temporarily halted and redirected around the area until the appropriate evaluation and follow-up measures are implemented so as to render the area suitable for grading activities to resume.

Mitigation Measure C-3: Prior to the issuance of building permits, the Applicant shall conduct site testing of subsurface geological formations in accordance with the Methane Mitigation Standards as indicated in LAMC Section 91.7104.1 to evaluate the existence of natural gas. Upon completion of the soil gas survey, the Applicant shall submit a report with the results of the survey to the City of Los Angeles.

Mitigation Measure C-4: If required by the site testing required by LAMC Section 91.7104.1, the Applicant shall develop and implement precautionary measures to address natural gas and to ensure construction worker safety. If necessary, these precautionary measures shall include having trained

personnel on-site to monitor for odorous gases and discolored soils, and having instrumentation on-site to monitor for non-odorous gases.

Mitigation Measure C-5: Construction contracts shall include provisions requiring continuous compliance with all applicable federal, state, and local government regulations and conditions related to hazardous materials and wastes management.

Mitigation Measure C-6: Should any unrecorded oil well be found during excavation, it shall be abandoned in accordance with the California Department of Conservation, Division of Oil, Gas and Geothermal Resources (DOGGR) under Title 124, Chapter 4 of the California Administrative Code or recorded per DOGGR regulations. Prior to issuance of any building permit, the Applicant shall submit a final clearance letter issued by DOGGR regarding the proper abandonment of the well(s).

Mitigation Measure C-7: Should any unrecorded oil well be found, prior to issuance of any building permit an engineering plan that includes proper safety measures and timing of the implementation of those measures shall be submitted to and approved by LADBS.

(b) Operation

Mitigation Measure C-8: If required by the site testing conducted in accordance with LAMC Section 91.7104.1, the Applicant shall develop and implement a methane gas mitigation system for the project in accordance with the applicable requirements of the City Methane Seepage Regulations. The specific design elements of the methane gas mitigation system, should it be required, shall be subject to review and approval of the LADBS in consultation with the LAFD.

(4) Level of Significance After Mitigation

The project would not expose people or structures to substantial risk resulting from the release or explosion resulting from gaseous emissions, or from an exposure to a health hazard in excess of applicable regulatory standards. The implementation of the mitigation measures, above, are not necessary to reduce the project's impacts to less than significant levels and would assure that this would occur. As such, project impacts with regard to hazards would be less than significant.

d. Land Use and Planning**(1) Consistency of the Proposed Project with Applicable Plans and Policies****(a) City of Los Angeles General Plan Framework**

As discussed above, project development would be subject to numerous local and regional land use plans and programs, as well as applicable development standards set forth in the City's Municipal Code. The project's consistency with the requirements and policies of the Los Angeles General Plan Framework, Transportation Element, Walkability Plan, Westwood Community Plan, Westwood Village Specific Plan, LAMC, and regional plans, including SCAG's, 2008 Regional Transportation Plan, and Compass Growth Vision is addressed below.

(i) Option 1 - Hotel/Condominium Project

Option 1 would be consistent with General Plan Framework's Land Use objectives by providing a mix of uses on an existing underutilized site within walking distance to a broad variety of uses; to reduce of vehicle trips, vehicle miles traveled, and air pollution by locating a mix uses within an existing, highly urbanized Regional Center currently served by Metro's Wilshire Boulevard Rapid Bus and future Purple Line subway; to reinforce the existing Community Center designation of Westwood Village by enhancing the daytime and nighttime pedestrian environment; to reinforce existing Regional Centers that accommodate a broad range of uses that are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles; to increase job opportunities associated with the operation of the hotel and to support local commerce by providing a hotel for visitors; to revitalize the currently underutilized project site, enhance pedestrian activity and safety, and to increase the general activity of the area, including evening and weekend activity by improving the pedestrian connection between Wilshire Boulevard and Westwood Village.

Option 1 would be consistent with the Framework's Urban Form objectives to support plans that build on the activity, diversity, and density of the Westwood Community and encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers. Option 1 would be consistent with Housing Policies by incrementally increasing the City's housing supply and locating 10 multi-family units in close proximity to existing and proposed transit. Option 1 would also be consistent with Open Space and Conservation policies by providing landscaped public open space, broader sidewalks, and landscape amenities along the project's frontages on Wilshire Boulevard and Gayley Avenue.

However, as Option 1 would have an overall FAR of 10.93:1, it would not be consistent with the General Plan Framework's current Long Range Land Use Diagram, West/Coastal Los Angeles, footnote D (FAR 2:1 in the north parcel) or with current Long Range Land Use Diagram, footnote G (FAR 6:1 in the south parcel). Existing combined FAR across the site is an

average of 4.1:1. In addition, consistent with south parcel, the north parcel would be developed in accordance with a Regional Center designation, and would not be consistent with the General Plan Framework's current Community Center designation for the south parcel. Through the proposed amendment of the Westwood Community Plan to Regional Center Commercial, which is intrinsic to Option 1 as discussed in Section II, Project Description, Subsection G, of this EIR, the FAR limitations expressed in footnotes D and G of the General Plan Framework would no longer be applicable to Option 1. The requested General Plan amendments would unify the range of designations, FARs, and zoning over the project site to create a single zoning classification and to allow for a cohesive development that would be consistent with the project's location along Wilshire Boulevard. As the proposed approval of the General Plan amendments and 4D Height District (11:1 FAR) would change the land use designations illustrated in the General Plan Framework, Option 1 would have no impact with respect to the General Plan Framework's FAR limitations. The proposed amendments to allow the entire project site to be developed according to a Regional Center Commercial designation would not significantly impact adjacent or surrounding properties within the community as a result of additional building height and a higher FAR. As Option 1 would not result in significant physical land use impacts as a result of the proposed amendments, Option 1 would have a less than significant impact with respect to the General Plan Framework.

(ii) Option 2 - Condominium Project

Option 2 would be consistent with the General Plan Framework for reasons similar to Option 1. Option 2 would have an identical building height and design, siting, FAR, parking, access, ground-floor retail uses with a street entrance and street-oriented display windows, public restaurant/bar, sidewalk widening, landscaping, and other amenities (such as glass porte-cochere open landscaped deck and pool). The primary difference between Option 1 and Option 2 is that Option 1's hotel units would become residential condominiums under Option 2. Rooms per floor and amenities such as balconies, spa, fitness center, and pool, would be the same as under Option 1. Option 2 would be substantially consistent with the applicable Land Use, Housing, Open Space and Conservation, and Transportation policies of the General Plan Framework (see prior analysis under Option 1 and in Table IV.D-1). Development of Option 2 would require similar plan amendments to Option 1, by locating a high-density residential use in close proximity to existing and proposed transit and within a high activity commercial node would reduce total vehicle trips and would support Objective 3.2 to a greater degree than under Option 1. Option 2 would have a greater relationship to the Framework's Housing policies than Option 1 in that it would provide more housing to meet the City's 20-year projected need; and would develop housing in a commercial area, which would preserve the character of existing lower density residential areas. Option 2 would also require amendments of FAR restrictions expressed in Footnotes D and G of the Framework's Long Range Land Use Diagram. With the proposed amendment of the Westwood Community and Westwood Village Specific Plans, Footnotes D and G of the Framework's Long Range Land Use Diagram would no longer be applicable. As with Option 1, the proposed

amendments would not result in significant land use impacts and would have a less than significant impact with respect to the General Plan Framework.

(b) General Plan Transportation Element

(i) Option 1

Option 1 would support applicable objectives and policies of the General Plan Transportation Element. These include applicable objectives to locate development in major economic activity areas and around transit stations; to preserve the existing character of lower density residential and retail areas; and to maintain or improve pedestrian-oriented environments. Option 1 would provide development within an existing activity center; incorporate pedestrian amenities; improve circulation patterns with the elimination of existing mid-block driveways and relocation of the alley to create a four-leg intersection for existing and future traffic at Gayley Avenue and Lindbrook Drive; avoid incursion into existing residential neighborhoods; and not diminish existing service levels at intersections in Westwood Village. As Option 1 would be consistent with applicable policies of this General Plan Element, the impact respect to this land use plan would be less than significant.

(ii) Option 2

Option 2 would be consistent with the General Plan Transportation Element for reasons similar to Option 1. Option 2 would support applicable objectives and policies of the General Plan Transportation Element, buy locating in a major economic activity incorporating pedestrian amenities; improving circulation patterns through the elimination of existing mid-block driveways and relocation of the alley to create a four-leg intersection for existing and future traffic at Gayley Avenue and Lindbrook Drive; avoid incursion into existing residential neighborhoods; and not diminish existing service levels at intersections in Westwood Village. As Option 1 would be consistent with applicable policies of this General Plan Element, the impact respect to this land use plan would be less than significant.

(c) Walkability Checklist

(i) Option 1

Option 1 would be consistent with all applicable policies of the Walkability Checklist. Option 1 would enhance the walkability of the section of Gayley Avenue between Wilshire Boulevard and Lindbrook Drive by upgrading the existing pedestrian environment. The project would provide a uniform, 10-foot-wide sidewalk; a well-defined ground level exterior wall; separate, direct street-front access to the proposed retail use and the hotel/residential use lobby;

large display windows; landscaping and new street trees; and exterior lighting to enhance pedestrian security. As the project would be consistent with applicable policies of this Checklist, land use impacts with respect to this guideline would be less than significant.

(ii) Option 2

Option 2 would be consistent with the Walkability Checklist for reasons similar to Option 1. Option 2 would enhance the walkability of the section of Gayley Avenue between Wilshire Boulevard and Lindbrook Drive by upgrading the existing pedestrian environment. The project would provide a uniform, 10-foot-wide sidewalk; a well-defined ground level exterior wall; separate, direct street-front access to the proposed retail use and the hotel/residential use lobby; large display windows; landscaping and new street trees; and exterior lighting to enhance pedestrian security. As the project would be consistent with applicable policies of this Checklist, land use impacts with respect to this guideline would be less than significant

(d) Westwood Community Plan

(i) Option 1 - Hotel/Condominium Project

Option 1 would be consistent with the land use goals of the Westwood Community Plan to provide a strong and competitive commercial sector to promote economic vitality, serve the needs of the community through well designed, safe and accessible areas while preserving the community's unique commercial, historic and cultural character; to promote the economic vitality of the Wilshire corridor and Westwood Village; to not would not encroach upon or limit the community's commercial, historic, or cultural character of Westwood Village; to conserve and strengthen viable commercial development in the community and to provide opportunities for new, compatible commercial development and services within existing commercial areas; to support pedestrian activity and security; to locate commercial uses in existing established commercial areas; to protect commercially planned/zoned areas from encroachment by residential development as the project is mixed use, with a portion of the site being commercial; to provide adequate parking, and improve safety and aesthetics of parking areas; to promote distinctive commercial districts and pedestrian-oriented areas; to encourage pedestrian-oriented design in new development; to require new development to be designed and developed to achieve a high quality, distinctive character and compatibility with adjacent development; to enhance the appearance of commercial districts through its high-quality architectural design, which would serve as a gateway feature for both the Wilshire district and Westwood Village.

Option 1 would be consistent with policies to require new development to achieve a high quality, distinctive character and compatibility with adjacent development in terms of community character and scale, by its consistency with the existing development pattern along Wilshire Boulevard and in Westwood Village, where low-rise uses interface with high-rise uses;

by the 75-foot setback of the tower from adjoining uses in Westwood Village to the north; and by its location to the south of Lindbrook Drive.

However, as the entire project site would be developed as Regional Center Commercial, Option 1 would not be consistent with the Westwood Community Plan Map's Community Commercial designation of the north parcel or with the Westwood Community Plan Map Footnote 5 regarding the north parcel's Village Specific Plan designation. In addition, Option 1, which would be developed to an FAR of approximately 10.93:1 over the entire project site, would not be consistent with the Westwood Community Plan Map, Footnotes 3 and 4 which indicate an FAR of 6:1, and 3:1, respectively on the south parcel. The height and density constraints of the Westwood Specific Plan Map Footnotes 3, 4, and 5 would be addressed through an amendment of the Westwood Community Plan's land use designation and respective footnotes, removal of the north parcel from the Westwood Village Specific Plan and Westwood Community Design Review Board Specific Plan, and a change from Height District 2 to Height District 4D (FAR 11.0:1) over the entire project site. With the approval of the requested amendments, the Westwood Community Plan's Community Commercial designation and Plan Map Footnotes 3, 4, and 5 would not be applicable to Option 1.

The proposed General Plan and Specific Plan amendments to allow the entire project site to be developed at a 11.1 FAR, 427-foot building height, and Regional Center Commercial designation would not significantly impact adjacent or surrounding properties as a result of additional building height and a higher FAR due to its location to the south of Lindbrook Drive and non-encroachment on any of Westwood Village's designated culturally and architecturally significant buildings; and lack of significant shade impacts. As Option 1 would be consistent with the existing land use pattern along the Wilshire corridor, and would not result in significant physical land use impacts as a result of the proposed amendments, Option 1 would have a less than significant impact with respect to the Westwood Community Plan.

(ii) Option 2 - Condominium Project

Option 2 would be consistent with the Community Plan for reasons similar to Option 1. Option 2 would have an identical building height and design, siting, FAR, parking, access, ground-floor retail uses with a street-level entrance and large street-oriented display windows, public restaurant/bar, porte-cochere, sidewalk widening, landscaping, and other amenities (such as glass porte-cochere pool and open landscaped deck). The primary difference between Option 1 and 2 is that Option 1's hotel units would become residential condominiums under Option 2. Rooms per floor and amenities such as balconies, spa, fitness center, and pool, would be the same as under Option 1. With respect to the Community Plan, Option 2 would be substantially consistent with the Plan's applicable land use policies to the same degree as Option 1, with the exception of Community Plan Goal 2 to create a strong commercial sector, since it contains a higher ratio of residential uses than under Option 1. On the other hand,

Option 2 would include a greater residential component and, in combination with a restaurant/bar and ground level retail uses, would strongly support the intent of Objective 2-2 to provide mixed use in the Plan area. Option 2 would also require an amendment of the Community Commercial designation on the north parcel and building height and FAR restrictions expressed in Plan Map Footnotes 3, 4, and 5. With the proposed amendment of the Westwood Community Plan Community Commercial designation and Footnotes 3, 4, and 5, these policies would no longer be applicable. The proposed amendments would not result in significant land use impacts. Therefore, Option 2 would have a less than significant impact with respect to the Westwood Community Plan.

(e) Westwood Village Specific Plan

(i) Option 1 - Hotel/ Condominium Project

Option 1 entails the amendment of the Westwood Village Specific Plan and Westwood Community Design Review Board Specific Plan to move the Specific Plan boundary north from the midpoint of the project site to Lindbrook Drive. The relocation of the Specific Plan boundary would exclude the north parcel, the portion of the project site currently located within the boundary of the Westwood Village Specific Plan. Option 1, which consists of a 427-foot-high building and 10.93:1 FAR, would not be consistent with the current height and density requirements of the Specific Plan, which allow a 2:1 FAR and maximum building height of 55 feet on the north parcel. However, Option 1 would be consistent with the Specific Plan's policies regarding allowable uses; hotel use; occupation of more than 80 percent of the ground floor with retail uses/hotel uses; parking; architectural articulation; and ground level entrances. In addition, as the project site is located more than one block from the Specific Plan's designated culturally and architecturally significant buildings, Option 1 would not impact the cultural or architectural integrity of these buildings and would be consistent with the goal of the Specific Plan to preserve these buildings. Option 1 would also incorporate architectural features that are compatible with some of Westwood Village's designated culturally and architecturally significant buildings.

The current Westwood Village Specific Plan boundary is north of Wilshire Boulevard, dividing the north and south parcels. The proposed Westwood Village Specific Plan amendment to move the Specific Plan boundary north from the midpoint of the project site to Lindbrook Drive would not significantly impact adjacent or surrounding properties within the community since the area remaining in the Westwood Village Specific Plan, after the boundary relocation, is already located to the north of Lindbrook Drive. The existing low-rise buildings in Westwood Village are generally located to the north of Lindbrook Drive, while the existing high rise development along Wilshire Boulevard (outside the boundaries of the Specific Plan) occurs to the south of Lindbrook Drive. As the project site is located entirely south of Lindbrook Drive, Option 1 would not result in an encroachment of high-rise development into Westwood Village.

The project's open balconies and terraced setbacks, stepping back at the 4th, 11th, 21st and 26th floors, would also soften and provide variation and interest to the building facades and reduce the project's scale and interface with Westwood Village.

In addition, the proposed project would not significantly shade any residential or outdoor recreational or restaurant uses beyond threshold criteria or generate other physical impacts as a result of the relocation of the Specific Plan boundary and the ensuing high-rise development. As Option 1 would be consistent with the area's existing land use pattern, and would not result in significant physical land use impacts as a result of the proposed amendment, Option 1 would have a less than significant impact with respect to the Westwood Village Specific Plan and its companion implementation mechanism set forth in the Westwood Community Design Review Board Specific Plan.

(ii) Option 2 - Condominium Project

Option 2 would be developed to the same scale, with identical building features and amenities, as Option 1. Option 2 would have an identical building height and design, siting, FAR, parking, access, ground-floor retail uses with a street entrance and large street-oriented display windows, public restaurant/bar, sidewalk widening, landscaping, and other amenities (such as glass porte-cochere pool and open landscaped deck). The primary difference between Option 1 and Option 2 is that Option 1's hotel units would become residential condominiums under Option 2. Rooms per floor and amenities such as balconies, spa, fitness center, and pool, would be the same as under Option 1.

Option 2 also includes a request for an amendment of the Westwood Village Specific Plan and Westwood Community Design Review Board Specific Plan to move the Specific Plan boundary north from Wilshire Boulevard to Lindbrook Drive. As with Option 1, Option 2 would not result in significant physical impacts, such as the shading of residential or outdoor uses beyond the City's significance threshold or other significant physical impacts as a result of the proposed building height, density, or land use. As Option 2 would be consistent with area's existing land use pattern, and would not result in significant physical land use impacts as a result of the proposed amendment, Option 2 would have a less than significant impact with respect to the Westwood Village Specific Plan and its companion implementation mechanism set forth in the Westwood Community Design Review Board Specific Plan.

(f) Los Angeles Municipal Code

(i) Option 1 - Hotel/Condominium Project

Option 1 comprises approximately 261,883 square feet of floor area over the combined north and south parcels (approximately 23,951 square feet), with a resulting FAR of approximately

10.93:1. The proposed FAR would exceed the allowable FAR on both the north and south parcels and over the combined site established under the existing zoning: [Q] C4-2-O in the south parcel and C4-2D-O in the north parcel. In addition, as Option 1 is anticipated to be 29 stories and approximately 427 feet in height, it would exceed the height limitations established by the D limitation and [Q] conditions for the north and south parcels, respectively. Therefore, Option 1 would not be consistent with the existing zoning designation with regard to development intensity and building height. The type of proposed uses (hotel, restaurant, retail, and residential condominiums), however, would be consistent with allowable land uses in the C4 zone.

Option 1 requires the approval of a zone change from C4-2D-O on the north parcel and from [Q]C4-2-O on the south parcel. The proposed zone change would amend the D limitation on the north parcel and the [Q] Condition on the south parcel. In addition, the proposed zone change would change the existing Height District from 2 to 4D consistently across both parcels. The proposed Height District 4D would allow development up to 11:1 FAR, with no height limitation. With the amendment of the D limitation and [Q] condition and zone change from 2 to 4D, the proposed 427-foot building height and 10.93 FAR under Option 1 would not exceed the LAMC's allowable development parameters for the project site.

Option 1 would also require a Zoning Administrator Adjustment to eliminate any west side yard setback; a conditional use to permit the sale of alcoholic beverages in conjunction with the operation of a restaurant; and a tract map for condominium purposes. With regard to the side yard setback at the western property line, the proposed building would be located at the property line at ground level. Commercial buildings are not required to maintain a side yard setback. However, mixed use buildings containing residential units are required to provide a setback for the building's residential portions, except along street or alley frontages.

The proposed zone change from C4-2D-O on the north parcel and [Q]C4-2-O on the south parcel, amendment of the D limitation on the north parcel and the [Q] condition on the south parcel, and height district change to change Height District 2 and 2D to Height District 4D on both parcels would allow the development of Option 1 in compliance with the requested designations. Although the proposed zone change would result in a taller building and more intense development of the project site than under existing designations, no significant physical impacts, such as shading of sensitive uses; loss or degradation of architecturally and culturally significant buildings in Westwood Village; or inconsistency with existing land use patterns, such as encroachment of high-rise development north of the Lindbrook Drive, would result from Option 1 due to building height and intensity. As the high-rise building allowed under the proposed zone change would be consistent with the existing land use pattern of the Wilshire corridor, and would not generate significant physical impacts due to building height and size, Option 1 would have a less than significant impact with respect to the LAMC.

(ii) Option 2 - Condominium Project

The primary difference between Option 1 and 2 is that Option 1's hotel units would become residential condominiums under Option 2. Rooms per floor and amenities such as balconies, spa, fitness center, and pool, would be the same as under Option 1. As with Option 1, Option 2 would require a proposed zone change from C4-2D-O on the north parcel and [Q]C4-2-O on the south parcel to amend the D limitation on the north parcel and the [Q] condition on the south parcel, as well as a height district change to change Height District 2 and 2D to Height District 4D on both parcels. Option 2 would also require a Zoning Administrator Adjustment to eliminate any west side yard setback; a conditional use to permit the sale of alcoholic beverages in conjunction with the operation of a restaurant; and a tract map for condominium purposes. In addition, Option 2 will specifically need a Zoning Administrator Adjustment to increase residential units above the maximum R5 density (one unit per 200 square feet of land area), not applicable to Option 1. The requested zone changes would allow the development of Option 2 in compliance with revised designations.

With regard to the required setback at the western property line, of the west wall of the proposed building would be located at the property line. Although commercial buildings are not required to observe a setback along any boundary lines, mixed use building containing residential uses above the first floor are required to provide yard setbacks for the Project's residential portion, except along public streets and alleys. The otherwise required yard setback from the property line for residential use within the building is provided by way of the abutting 20-foot wide sewer easement on the abutting property to the west. Therefore, locating the proposed building at the property line would not impact the development or redevelopment of an adjacent property.

Under the proposed Regional Center designation, development of the project site could occur in compliance with the R5 zone, at a rate of one unit per 200 square feet of buildable area (LAMC Sec.12.22.A.18 (a)). As no yard requirements would be applicable under LAMC Sec.12.22.A.18 (c)(2)(ii) except for the west side yard, the project site's buildable area would be 23,951 square feet, which would allow 120 units under the R5 zone. The proposed Zoning Administrator Adjustment would allow an additional 24 units (20 percent), for a total of 144 residential units.

As with Option 1, the proposed zone change from C4-2D-O on the north parcel and [Q]C4-2-O on the south parcel, amendment of the D limitation on the north parcel and the [Q] condition on the south parcel, and height district change to change Height District 2 and 2D to Height District 4D on both parcels would allow the development of a high-rise building would not result in significant physical impacts, such as shading of sensitive uses, loss or degradation of architecturally and culturally significant buildings in Westwood Village, or inconsistency with existing land use patterns, such as encroachment of high-rise development north of the

Lindbrook Drive. Also, as the proposed high-rise development would be consistent with the existing land use pattern of the Wilshire corridor, and would not generate significant physical impacts due to building height and size, Option 2 would have a less than significant impact with respect to the LAMC.

(g) Regional Transportation Plan

(i) Option 1 - Hotel/ Condominium Project

Option 1 would support RTP goals to maximize mobility and accessibility for all people and goods in the region, support travel safety, and to maximize the productivity of the region's transportation system by locating within a close proximity to an existing transit line (Metro Rapid Bus) and the I-405 and Wilshire Boulevard node. The project site is also in close proximity to Metro's proposed Purple Line subway, which would serve Westwood via Wilshire Boulevard. No significant impacts with respect to RTP policies, many of which were adopted for the purpose of avoiding or mitigating an environmental effect, would occur.

(ii) Option 2 - Condominium Project

The primary physical difference between Option 1 and Option 2 is that Option 1's hotel units would become residential condominiums under Option 2. Rooms per floor and amenities such as balconies, spa, fitness center, and pool, would be the same as under Option 1. Option 2 would support the applicable regional policies of the RTP in a similar manner as Option 1 and would have a less than significant impact with respect to the RTP.

(h) Compass Blueprint Growth Vision

i) Option 1 - Hotel/ Condominium Project

Option 1 would be consistent with the principals of the Compass Blueprint Growth Vision Plan in that it is located within the Plan's designated 2% Strategy Opportunity Area for the City of Los Angeles. The Compass 2% Strategy Opportunity Area is a key target area for regional development in which new development is focused in existing urban centers. Option 1 would be consistent with Principle 1 to improve mobility for all residents, by locating a new development in a mutually supportive environment, in which new housing is near existing jobs and new jobs are located near existing housing, development is located in close proximity to transit, and a variety of travel choices are available and with Principle 2 to foster livability by providing infill development and redevelopment to revitalize an existing community, providing a mix of uses, and by creating a "people-scaled," walkable communities. Option 1 would also support the preservation of stable, single-family neighborhoods, in that the project is located in

an existing commercial area. Option 1 would be consistent with Principle 3 in its availability to any person and with Principle 4 in that development is focused in an existing urban center, resources are used efficiently (vehicle trips reduced due to proximity of transit available services, etc., and “green” development technique and LEED standards would be implemented. No significant impacts with respect to Compass Blueprint Growth Vision policies, many of which were adopted for the purpose of avoiding or mitigating an environmental effect, would occur and, therefore, no mitigation measures are necessary.

(ii) Option 2 - Condominium Project

The primary physical difference between Option 1 and Option 2 is that Option 1’s hotel units would become residential condominiums under Option 2. Rooms per floor and amenities such as balconies, spa, fitness center, and pool, would be the same as under Option 1. Option 2 would support the applicable regional policies of the Compass Blueprint Growth Vision. However, Option 2, which would include a greater residential component than Option 1, would more strongly support the intent of the Compass Blueprint Principle 1 to locate housing near jobs and Principle 2 to preserve existing stable, single-family neighborhoods, that more high-density housing would be located within an existing commercial district. No significant impacts with respect to these regional policies, many of which were adopted for the purpose of avoiding or mitigating an environmental effect, would occur.

(2) Land Use Compatibility

(a) Compatibility of Scale

(i) Option 1 - Hotel/Condominium Project

Option 1, by locating a high-rise tower at the north side of Wilshire Boulevard that steps down significantly on its northern face and as it approaches Westwood Village, would continue the existing pattern of high-rise development along Wilshire Boulevard and would provide in-fill along the north side of Wilshire Boulevard to complement the developed Wilshire Boulevard high-rise corridor. As with other high-rise development along Wilshire Boulevard, in which high-rise buildings are located adjacent to low-rise commercial and residential uses, Option 1 would be of a greater scale than the adjacent commercial land use within Westwood Village to the north, but would also step down to four stories and be no higher than the adjacent developed property in Westwood Village along its north property line.

Although the juxtaposition of tall buildings with low-rise uses along the Wilshire Boulevard corridor is an established land use pattern, a significant impact could occur if Option 1 encroached into and altered the land use patterns within Westwood Village. However, Option 1,

which would be located entirely south of Lindbrook Drive, would not alter the existing land use pattern of Westwood Village, which is located primarily to the north of Lindbrook Drive, with higher intensity uses outside Westwood Village located to the south of Lindbrook Drive. In addition, due to the distance between the proposed hotel tower and the Westwood Village's designated culturally and architecturally significant buildings, Option 1 would not physically impinge on these buildings. As such, Option 1 would not encroach into those areas of Westwood Village where incompatibility of development intensity would adversely change the existing relationships between land uses.

Option 1 would also maximize the setback between the proposed high-rise building and the adjacent, three-story commercial use to the north through the location of the open entrance area and porte-cochere at the north edge of the project site. The north radius of the project's porte-cochere would extend, at its farthest point, 15 feet into the 20-foot alley right-of-way, leaving a clearance of five feet between the farthest curved edge of the porte-cochere and the south wall of the adjacent, three-story commercial building to the north. The wall of the hotel/residential tower would be located 75 feet from the project site's north boundary and 90 feet from the off-site building to the north. In addition, design elements such as the location of the hotel's landscaped entrance area and landscaping on the roof of the four-story porte-cochere at the north side of the building would soften the interface of the proposed building to the three-story, off-site use. In addition, the 40-foot-high, porte-cochere at the north side of the high-rise structure would create a sense of common scale with the adjacent 45-foot-high, three-story commercial building to the north. To further maximize setbacks from the off-site use, the proposed tower would be tiered, with terracing at the fourth, tenth, twentieth, twenty-fifth, and twenty-sixth floor levels.

Option 1 high-rise building would have a flatiron (triangular) shape, in which the north wall represents the narrowest of the three sides. The placement of the building's narrowest wall facing Westwood Village to the north would also incrementally reduce the potential conflict of intensity between the adjoining properties. As the proposed building would be separated from the Westwood Village Specific Plan area by the alley and Lindbrook Drive and setbacks from the adjoining commercial use to the north, it would not physically encroach into the Westwood Village Specific Plan area or directly or indirectly impact any of Westwood Village's culturally or architecturally significant buildings. As Option 1 would not physically encroach into the Westwood Village Specific Plan area, and would continue an existing pattern of development along the Wilshire corridor in which high-rise buildings are juxtaposed with low rise commercial and residential land uses, Option 1 would not adversely change the existing relationships between land uses or properties in the community due to the height of the proposed hotel/residential tower. Therefore, Option 1 would have a less than significant land use impact with respect to compatibility of scale.

(ii) Option 2 - Condominium Project

Option 2 would have the same physical configuration and exterior treatment as Option 1. As such, Option 2 would have a less than significant land use impact with respect to compatibility of scale.

(b) Compatibility of Use**(i) Option 1 - Hotel/Condominium Project**

Option 1 would provide a mix of hotel, restaurant, and retail land uses that would be consistent with the surrounding commercial community or, as with the residential component, land uses that would be less intensive in nature than surrounding commercial uses. Residential uses are permitted in commercial zones in the City of Los Angeles since residential uses do not include features or generate activity that impinge on the function or enjoyment of commercial uses. The proposed ground level high-quality retail use would be similar to and support the existing street front retail uses in the adjoining Westwood Village, while the proposed hotel would support the surrounding residential and business community, including the university. Option 1 would further support the surrounding community and would increase land use compatibility by enhancing the existing pedestrian environment. In addition, the distance between the proposed hotel tower and Westwood Village's designated culturally and architecturally significant buildings would support the preservation goals of the Specific Plan. Therefore, the mix of hotel, commercial, and residential uses provided under Option 1 would be compatible with surrounding commercial uses in the area, and would not substantially or significantly change the existing relationships between land uses or properties in the existing surrounding community.

(ii) Option 2 - Condominium Project

Option 2, which would contain 144 residential units, a restaurant, and street-level retail uses, would be consistent with the surrounding commercial community. Residential uses are permitted in commercial zones in the City of Los Angeles since residential uses do not include features or generate activity that impinge on the function or enjoyment of commercial uses. As with Option 1, the proposed ground level high quality retail use would be similar to and support the existing street front retail uses in the adjoining Westwood Village. Option 2 would also support the surrounding community and would increase land use compatibility by enhancing the existing pedestrian environment. In addition, the distance between the proposed residential tower and Westwood Village's designated culturally and architecturally significant buildings would support the preservation goals of the Specific Plan. Therefore, the mix of residential and commercial uses provided under Option 2 would be compatible with surrounding commercial

uses in the area, and would not substantially or significantly change the existing relationships between land uses or properties in the existing surrounding community.

(3) Mitigation Measures

With the approval of the requested entitlements, both Option 1 and Option 2 would result in less than significant impacts associated with land use compatibility and consistency with regulatory land use plans and guidelines. Therefore, no mitigation measures would be required.

(4) Cumulative Impacts

Of the 23 related projects, all are located within the Westwood Community Plan area, with the exception Related Project 17, which is located to the west of I-405. Three related projects, Related Projects 1, 2 and 4 are located within the Westwood Village Specific Plan area. Related Project 1 (1130 Gayley Avenue) is an approximately 10,600 square foot retail project. Related Project 2 (1120 Glendon Avenue) is a mixed-use project consisting of 350 residential units and 50,000 square feet of commercial floor area which has recently been completed. Related Project 2 replaces a former high-rise office and restaurant land use that existed prior to the development of the Westwood Village Specific Plan. Therefore, Related Project 2 would not change the intensity of development at 1120 Glendon Avenue, although it exceeds the FAR parameters of the current Westwood Village Specific Plan. The major difference between the former land use at 1120 Glendon Avenue and the current Related Project 2 is the latter's mixed-use nature and introduction of residential uses to the Westwood Village Specific Plan area which, prior to Related Project 2, included minimal residential land uses. As Option 1 would also contain a mix of commercial and residential uses, it would be consistent with the intensity of residential development represented by Related Project 2. However, as the project would require the removal of the site's north parcel from the Westwood Village Specific Plan, the project and Related Project 2 would not have a cumulative land use impact on the Specific Plan.

Related Project 4 (900 Gayley Avenue) consists of approximately 2,650 square feet of retail floor area and would be consistent with the low intensity commercial development within the Westwood Village Specific Plan.

Growth generated by related projects within the Westwood Community Plan, both within and outside the Westwood Village Specific Plan area, would total of 1,033 residential units, 139,605 square feet of commercial and/or mixed use floor area, and 42 hotel rooms. Of this development 350 residential units would be located within the Westwood Village Specific Plan area and 683 residential units would be located within the Westwood Community Plan, outside Westwood Village. Of the total 139,605 square feet of commercial floor area, approximately 63,370 square feet would be developed within the Westwood Village Specific Plan area and

76,235 square feet for floor area and 42 hotel rooms would be developed within the Westwood Community Plan outside Westwood Village. Of the commercial floor area occurring outside the Westwood Village Specific Plan area, 50,000 square feet associated with Related Project 17 is identified as “mixed-use,” although no residential units are identified in conjunction with this related project. Assuming an occupancy factor of 2.07 persons per unit, cumulative residential development, under Option 1 with 10 residential units, the project combined with related projects would result in a cumulative population increase of approximately 2,159. Under Option 2 with 144-residential units, the project combined with related projects would result in a cumulative population increase of approximately 2,436 in the Westwood Community Plan and Westwood Village Specific Plan areas.

Cumulative development in the area would be consistent with the goals of SCAG’s regional plans, which anticipates a population increase in the City of Los Angeles of 70,641 people between 2010 and 2020. The cumulative growth in the Westwood Community would represent approximately 3.45 percent of the total growth in the City which, as it would not exceed the RTP growth forecast, would not be significant. The Westwood Community’s forecasted growth divided by the City’s 35 Community Plan area would indicate a slightly higher growth rate than in more suburban areas, which is expected of a highly urbanized area.

Cumulative growth in Westwood would also be consistent with Los Angeles General Plan Framework and RTP goals to reduce vehicle miles by locating residents in closer proximity to employment and RTP goals to support patterns of urban development that use existing infrastructure facilities, provide proximity to transit, and support development in activity centers. Cumulative development in Westwood would also be consistent with Compass Blueprint Growth Vision policies to locate growth along existing urban areas and in the proximity of major transportation facilities, such as transit systems and freeways.

With the exception of Related Project 2, the related projects would be consistent with the applicable land use designations of the respective Westwood Village Specific Plan and Westwood Community Plan, and would not require General Plan or other land use plan amendments. As related projects would be generally consistent with land use plan designations, these would not cumulatively or adversely change the existing relationships between numerous land uses in the existing surrounding community. Therefore, cumulative land use impacts would be less than significant.

(5) Level of Significance after Mitigation

With the approval of the requested entitlements, Options 1 and 2 would each be consistent with the applicable regulatory framework relative to land use, including the General Plan Framework, the Westwood Community Plan, the Zoning and Planning Code, and SCAG’s 2008 RTP, and Compass Blueprint Growth Plans and no mitigation measures are required. In

addition, the proposed project would be compatible with the existing land use, intensity, and scale of development in the adjacent and surrounding area. Therefore, the project would result in less than significant impacts with regard to land use and planning.

e. Noise

(1) Construction Noise

(a) On-Site – Option 1 and Option 2

Using the conservative industry standard sound attenuation rate of 6 dB per doubling of distance for point sources (e.g., construction equipment), the worst-case construction-period noise levels were estimated at the noise sensitive receptors by phase of construction activity. The estimated noise levels represent a worst case scenario because construction activities are analyzed as if they were occurring along the perimeter of the construction area, whereas construction would typically occur throughout the site and at a farther distance from noise-sensitive receptors. In addition, the noise sensitive receptors that are located farther from the construction site would experience less construction noise, as sound diminishes away from the source and due to intervening buildings between the source and receiver. Construction-related noise would not exceed ambient noise levels at the nearest multi-family residential uses near Midvale Avenue, the residences north of Wilshire Boulevard, or the residences along Gayley Avenue north of Weyburn Avenue. As such, construction-period noise impacts would be less than significant at the nearby noise sensitive receptors and no mitigation measures are required. In addition, construction related noise would exceed the ambient noise levels at the office and commercial/retail uses adjacent to the project site. Therefore, though not required by noise regulations because these uses are not sensitive receptors or significantly impacted, mitigation measures are recommended to minimize and reduce the construction noise at these receptors.

(b) Off-Site – Option 1 and Option 2

In addition to the on-site construction noise, haul trucks, delivery trucks, and construction workers would require access to the project site throughout the project's construction period. Major noise sources associated with the operation of the construction site would be haul trucks and delivery trucks. While construction workers would arrive from various directions, haul trucks and delivery trucks would generally access the site via Wilshire Boulevard to the 405 freeway. It is estimated that during excavation there would a maximum of 60 haul truck trips (30 inbound and 30 outbound trips) per day. Based on 6-hours of hauling activity, there would be approximately 10 truck trips (5 inbound and 5 outbound) on an hourly basis. The project's haul trucks would generate approximately 60 dBA (L_{eq}) at 25 feet distance along Wilshire Boulevard (haul route), which would be below the existing ambient noise level of 66 to 73 dBA (L_{eq}) along Wilshire Boulevard. In addition, there are no noise sensitive receptors along Wilshire Boulevard between the project site and the 405 freeway. Therefore, noise impacts from

off-site construction traffic would be less than significant and no mitigation measures are required.

(2) Construction Vibration – Option 1 and Option 2

The proposed project construction would generate ground-borne vibration during site clearing and grading activities when using large bulldozer equipment. The nearest buildings to the site, which are located approximately 20 feet to the north and west of the site, would be exposed to vibration velocities ranging from approximately 0.004 to 0.124 inches per second PPV. As this value is well below the 2.0 inches per second PPV significance threshold for potential building damage (applicable to well engineered buildings), vibration impacts associated with construction would be less than significant. In addition, the medical building at 10921 Wilshire Boulevard is approximately 90 feet from the project construction site. A large bulldozer generates a maximum vibration level of 0.022 inches per second RMS at a distance of 25 feet. The vibration level would dissipate to 0.003 inches per second RMS, which is below the 0.004 inches per second RMS significance threshold for medical buildings with sensitive uses (i.e., operating procedures or sensitive testing equipment). As such, construction vibration impacts would be less than significant at the nearest use that is potentially sensitive to vibration.

(3) Operational Noise

(a) Off-site Roadway Noise – Option 1 and Option 2

Off-site roadway noise impacts associated with Option 1 and Option 2 would be less than significant. No mitigation measures are required.

(b) Stationary Point-Source Noise

(i) Mechanical Equipment – Option 1 and Option 2

As part of project design, building mechanical equipment (e.g., parking structure air vents and building heating ventilation and air conditioning, HVAC, equipment) would be located on the second level of the building and would be entirely enclosed. In addition, mechanical and electrical equipment would be designed to comply with the City's Noise Ordinance requirement and the project significance threshold of 5 dBA above the ambient noise levels. Therefore, noise from project mechanical and electrical equipment would not exceed the 5 dBA significance threshold and impacts would be less than significant and no mitigation measures are required.

(ii) Loading Dock and Refuse Collection Areas – Option 1 and Option 2

Based on a noise level source strength of 71 dBA at a reference distance of 50 feet, and accounting for barrier-insertion loss (minimum 20 dBA insertion loss) and distance attenuation

(6 dBA per doubling of distance), loading dock noise would be 28 dBA at the closest multi-family residential uses. Similarly, the trash compactor noise level of 66 dBA at 50 feet would be reduced to 23 dBA at the closest sensitive receptor. Therefore, the loading dock and refuse collection operation would not cause the existing daytime ambient noise level of 61 dBA at the closest receptor to increase by the 5-dBA significance criterion. Operational noise impacts to surrounding uses would be less than significant. No mitigation measures are required.

(iii) Parking Facility Noise Levels – Option 1 and Option 2

Primary vehicular access to the parking facility would be provided from Gayley Avenue near its intersection with Lindbrook Drive. A circular driveway would be provided for drop-off and pick-up at the project. Based on its subterranean and enclosed location, the parking facility would not result in any noise impacts and, therefore, no mitigation measures are required.

(iv) Emergency Rooftop Helipad Noise Levels – Option 1 and Option 2

The proposed project would include an emergency helipad pursuant to LAMC requirements. Due to infrequent and the emergency nature of such a use, adverse noise impacts related to helipad uses would be less than significant and, therefore, no mitigation measures are required.

(v) Pool Facility – Option 1 and Option 2

The proposed building design includes structural parapet wall at the pool level (fourth level) that combined with the existing buildings (including multiple high rises) in the project area would provide effective sound attenuation. Therefore, pool operations would not result in a substantial increase in ambient noise levels, and potential impacts would be less than significant and no mitigation measures are required.

The structural parapet wall combined with the existing buildings around the pool area would act as a noise barrier for pool uses. No pool areas would have direct line-of-sight to Gayley Avenue and Wilshire Boulevard, and the buildings would be of sufficient height to attenuate roadway-related noise to below 65 dBA for pool uses. As such, potential impacts to the pool area would be less than significant.

(vi) Motor Court – Option 1 and Option 2

The motor court would be screened from noise sensitive receptors by the proposed building and existing high rise buildings along Wilshire Boulevard to the south and along Gayley Avenue to the east. Given the distance to the sensitive receptors and the existing buildings that

would provide attenuation, vehicles in the motor court would not result in a significant noise impact and no mitigation measures are required.

(vii) Composite Noise Level Impacts from Project Operations – Option 1 and Option 2

The project on-site noise sources, including mechanical/electrical equipment, parking facility, loading dock, refuse collection, pool area and motor court, would also be below the ambient noise levels for Option 1 and Option 2. Overall, relative to the existing ambient noise environment, the proposed project is not expected to increase the ambient sound level at the nearest noise-sensitive receptor R2 under both Option 1 and Option 2. The project off-site traffic would result in a maximum noise increase of 1.1 dBA (CNEL) under Option 1 and 1.0 dBA (CNEL) under Option 2 along Lindbrook Drive between Gayley Avenue and Westwood Boulevard, which would be below the project's 3 dBA significance threshold. Furthermore, there are no noise sensitive receptors along this roadway segment. As such, the composite noise level impact due to the proposed project would be less than significant and no mitigation measures are necessary.

(c) Site Compatibility (Option 1 and Option 2 - Proposed Residential and Hotel Uses)

The proposed building would likely be exposed to existing noise levels that exceed the City of Los Angeles' noise compatibility standard of 65 dBA CNEL for residential uses due primarily to traffic on adjacent roadways. The interior noise limits for the residential/hotel use is maximum 45 dBA CNEL. Incorporation of the Mitigation Measure E-6 would reduce potential impacts associated with the introduction of residential/hotel uses to a less than significant level, 45 dBA CNEL, at the interior of these units.

(4) Vibration Associated with Project Operation – Option 1 and Option 2

The potential vibration impacts from all proposed project sources at the closest structure locations would be less than the significance threshold of 0.01 inches per second RMS for perceptibility. As such, vibration impacts associated with operation of Option 1 or Option 2 would be below the significance threshold and vibration impacts during operation would be less than significant and no mitigation measures are required.

(5) Cumulative Impacts

Of the 23 related projects, there are four related projects situated less than approximately 1,500 feet from the project site, including Related Project No. 1 – Retail at 1130 Gayley Avenue, Related Project No. 2 – Condominiums and Commercial at 1120 Glendon Avenue, Related

Project 3 – Hotel and Retail at 10844 – 10852 Lindbrook Drive, and Related Project No. 4 – Retail at 900 Gayley Avenue.

(a) Construction Noise

Noise from on-site construction activities are localized and would normally affect the areas within 500 feet from the individual construction site. Related Project No. 1 is approximately 90 feet from the site and could contribute to the cumulative noise impact on the nearest noise sensitive receptor. Since the timing of the construction activities for these related projects cannot be defined and is beyond the control of the City and the project applicant, any quantitative analysis that assumes multiple, concurrent construction projects would be entirely speculative. Even if Related Project No. 1 proceeds and involves construction activities that would occur at the same time as the proposed project, construction related noise from the two projects at the closest sensitive receptor would likely not exceed the ambient noise by 5 dBA due to distance attenuation and shielding from intervening buildings. Thus, cumulative construction noise impact on the nearest noise receptor would be less than significant. Related Project Nos. 2, 3, and 4 are located approximately 700 feet to 1,500 feet from the proposed project site. However, due to distance attenuation and shielding from intervening buildings, cumulative construction noise impacts on the nearby noise sensitive uses would be less than significant. As such, cumulative impacts associated with construction noise would be less than significant and no mitigation measures would be necessary.

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

(b) Operation

Cumulative traffic volumes would result in a maximum increase of 1.5 and 1.4 dBA CNEL along the segment of Lindbrook Drive between Gayley Avenue and Westwood Boulevard under Option 1 and Option 2, respectively. The cumulative noise increase at all other analyzed roadway segments would be lower. As the noise level increase would be below the conservative 3-dBA CNEL significance threshold, roadway noise impacts due to cumulative traffic volumes would be less than significant for both Option 1 and Option 2 and no mitigation measures would be required.

Due to LAMC provisions that limit noise emission from stationary-noise sources such as roof-top mechanical equipment and emergency generators, noise levels would be less than significant at the property line for each related project. For this reason, on-site noise produced by any related project would not be additive to project-related noise levels. As the project's

composite stationary-source impacts would be less than significant, the project would not contribute to a significant composite stationary-source noise impacts attributable to cumulative development. Therefore, cumulative operational noise would be less than significant. Additionally, based on the location of the proposed project relative to the related projects (with intervening buildings and roadways), the location of sensitive receptors, and the parking-related noise that the project would cause, significant cumulative impacts associated with parking-related noise would not occur.

(6) Mitigation Measures

(a) Construction

With the implementation of the project design features, project construction would result in less than significant noise impacts. Although not necessary to reduce impacts to a less than significant level, the below mitigation measures are recommended to ensure that potential impacts remain less than significant for Option 1 and Option 2.

Mitigation Measure E-1: Construction activity shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574.

Mitigation Measure E-2: To the extent feasible, construction activities shall be scheduled so as to avoid operating several pieces of heavy equipment simultaneously, which causes high noise levels.

Mitigation Measure E-3: Noise-generating construction equipment operated at the project site shall be equipped with effective noise control devices, (i.e., mufflers, lagging, and/or motor enclosures). All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

Mitigation Measure E-4: Engine idling from construction equipment such as bulldozers and haul trucks shall be limited.

Mitigation Measure E-5: The construction staging area shall be located as far as possible from sensitive receptors.

(b) Operation

Although less than significant impacts were identified related to project operations, the proposed hotel/condo building would be located in a high traffic noise environment. Therefore, the following mitigation measure is recommended to ensure that the new building would provide

adequate sound insulation to reduce the exterior traffic noise impacts for future residents/occupants of the building.

Mitigation Measure E-6: The Applicant shall retain the services of an acoustical engineer with expertise in design of building sound isolations, who shall submit a signed report prior to the issuance of building permits indicating the proposed building design shall meet the interior noise level of 45 dBA CNEL, as required by City's Building Code. Building design to address sound insulation shall include to the extent necessary to achieve the interior noise level of 45 dBA CNEL features such as (1) air-conditioning/mechanical ventilation such that the units shall not have to rely on open windows for ventilation; (2) dual insulating glazed systems; (3) doors and windows opening to the exterior with acoustical seals; (4) fitting vents with dampers and/or acoustic louvers.

(7) Level of Significance After Mitigation

(a) Construction

Construction of the proposed project (Option 1 or Option 2) would not result in any significant noise impacts to off-site receptors. Incorporation of the prescribed mitigation measures would ensure that construction noise impacts remain less than significant.

(b) Operation

The project's operation, under Option 1 and Option 2, would not result in any significant noise impacts to off-site receptors during long-term project operation. With implementation of Mitigation Measure E-6, future on-site sensitive uses (hotel and/or residential) would not be exposed to inappropriately high noise levels from off-site activity (i.e., vehicle traffic on Wilshire Boulevard) and, therefore, noise impacts would be mitigated to a less than significant level.

f. Public Services**(1) Fire Protection****(a) Environmental Impacts****(i) Construction – Option 1 and Option 2**

Construction activities may temporarily increase the existing demand on fire protection and emergency medical services, and may cause the occasional exposure of combustible materials. In compliance with Occupational Safety and Health Administration (OSHA) and Fire and Building Code requirements, construction managers and personnel would be trained in emergency response, and private fire monitoring personnel would be trained with regard to the sequence of operations guidelines. Fire suppression equipment specific to construction would be maintained on-site. Project construction would comply with applicable existing codes and ordinances, in which additional demand on fire protection and emergency medical services would not exceed the current capabilities of the LAFD. Therefore, construction impacts on fire protection and emergency medical services would be less than significant.

Construction-related traffic on adjacent streets could potentially affect emergency access to the project site. Construction activities may involve temporary lane closures for utility construction, crane erection, the foundation mat slab pour and flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction. As such, construction activities could increase response time for emergency vehicles to the project site and to local businesses on Wilshire Boulevard, Gayley Avenue and Kinross Avenue, due to travel time delays to through traffic. However, these interruptions in traffic flow would be infrequent and would be of short duration and any construction access would occur along Gayley Avenue or the public alley at the northern boundary of the site. Additionally, any work performed within the public right-of-way would require prior approval from the City and would be limited to non-peak travel periods (between the hours of 9:00 A.M. and 3:00 P.M.). Furthermore, the proposed project would not result in any significant impacts on the level of service at the study intersections. The proposed project would require implementation of a Construction Staging and Traffic Management Plan per LAMC requirements. Upon implementation of this plan and the recommended mitigation measures, traffic impacts from construction activity would be reduced to a less than significant level. Therefore, construction-related traffic impacts to emergency access would be less than significant.

(ii) Operation

Fire Station No. 37 is located closest to the project site and would be the “first-in” station to respond to an emergency and is staffed with 14 personnel on a 24-hour basis.

Option 1 – Hotel/Condominium Project

Option 1 would generate approximately 220 new residents and hotel guests.³ In addition, the project would include approximately 209,857 square feet of hotel area, which includes all building square footage except the square footage associated with the condominium units. Part of the hotel area would include retail and related services of 27,785 square feet consisting of retail, restaurant, fitness center, spa and coffee shop. Based on this amount of commercial square footage, Option 1 would generate approximately 182 employees.⁴ With a generation factor of 0.1205 incidents per capita, the future residents and hotel guests of Option 1 could potentially generate 27 incidents per year and the projected employees could potentially generate 22 incidents per year. Therefore, Option 1 could result in a total of 49 additional incidents per year. As such, Option could increase the demand on LAFD services.

Option 2 – Condominium Project

Option 2 would generate approximately 278 new residents.⁵ Option 2 would provide 27,785 square feet of retail and related services, generating approximately 66 employees.⁶ Based on the generation factor of 0.1205 incidents per capita, the residential component of Option 2 could potentially generate 33 incidents per year and the retail and services portion could potentially generate eight incidents. As such, Option 2 could result in a total of 41 additional

³ Assuming full occupancy as the worst case condition under the hotel use and applying the population conversion factor of 1.5 persons/room/day according to the 2006 L.A. CEQA Thresholds Guide, p.K.1-3, it is estimated that 201 hotel guests would reside at the project at any one time (134 rooms x 1.5 persons/room/day= 201 persons). For the ten condominium units, the current household ratio of 1.93 residents/unit under the Westwood Community Plan was applied, resulting in 19 new residents (10 condominium units x 1.93 residents/unit). The resulting occupancy is estimated to be 220 residents and hotel guests.

⁴ Based on Employment Density Report prepared by the Natelson Company, Inc. derived from SCAG database and Assessor's Parcel records. Using employment generation category of "Hotel/Motel" for the SCAG region, an estimated employment generation of 182 employees based on a hotel floor area, excluding the condominium square footage, of 209,857 square feet (261,883 s.f. – 52,026 s.f.) (0.87 employees/1000s.f. x 209,857 s.f.=182.2 employees). For the above analysis, an employee credit was not taken for the pre-existing video retail store to accommodate a more conservative approach.

⁵ Based on the 2007 Westwood Community Plan household population data of 1.93 persons per unit provided by the City of Los Angeles. The current household ratio of 1.93 reflects recent updated demographic information by the City since preparation of the Initial Study where a household ratio of 2.06 (based on 2006 Census Tract data) was utilized for assessment purposes.

⁶ Based on Employment Density Report prepared by the Natelson Company, Inc. derived from SCAG database and Assessor's Parcel records. Using employment generation category of "Other Retail/Svc" for the Los Angeles region, an estimated employment generation of 66 employees based on a related retail floor area (includes retail, restaurant, fitness center, spa and coffee shop at 6,510 s.f., 9,975 s.f., 4,500 s.f., 3,000 s.f. and 3,800 s.f., respectively) of 27,785 square feet (2.36 employees/1000s.f. x 27,785 s.f.=65.6 employees). Similar to above, an employee credit was not taken for the pre-existing video retail store to accommodate a more conservative approach.

incidents per year. Thus, project implementation under Option 2 could increase the demand on LAFD services.

Option 1 and Option 2

The adequacy of fire protection for a given area is based on response distance from existing fire stations, required fire flow, and the LAFD's judgment for needs in the area.⁷ Fire Station No. 37 is located 0.2 miles from the project site, which is well within the recommended maximum response distance (1.5 miles), and has an estimated response time of 2.9 minutes to the project site. The potential increase in fire related services that could occur under Option 1 or Option 2 would not require additional or expanded facilities or resources to serve the project. Therefore, construction of additional stations in closer proximity to the project site would not be required under Option 1 or Option 2.

With regard to fire flow, requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Due to the high-rise construction and the similar mix of uses contained in Option 1 and Option 2, the fire flow requirements would remain the same under either option. While the existing fire flow to the project site is approximately 5,270 gpm with a residual pressure of 66 psi and, therefore, exceeds the required fire flow, the LAFD Hydrant and Access Unit has recommended the installation of a new hydrant along the project frontage of Gayley Avenue in addition to the three existing fire hydrants in the vicinity that may serve the site.⁸ The addition of this fourth hydrant would result in the location of a hydrant within close proximity to the project site as existing hydrants to the east and south of the project site are located across Gayley Avenue and Wilshire Boulevard, respectively. In addition to ensuring the availability of an adequate fire flow, the installation of hydrants, including the number, sizes, and locations, would also occur in compliance with the requirements of Division 9 (Section 57.09.06). Based on the above, the project would comply with applicable Fire Code, Building Code, and LAFD requirements and Option 1 and Option 2 would have a less than significant impact relative to fire safety, access, and fire flow. Nonetheless, mitigation measures are proposed below to ensure that such impact would remain less than significant.

Project-related increase in traffic on surrounding roadways could have an impact on fire protection and emergency medical services if the response capabilities of the LAFD are impeded. However, due to the proximity of Fire Station No. 37 (0.2 miles) and the other three supporting

⁷ *Email correspondence from Michael Theule, Fire Inspector II with the Los Angeles Fire Department's Hydrant and Access Unit, dated September 5, 2008.*

⁸ *Email correspondence from Michael Theule, Fire Inspector II with the Los Angeles Fire Department's Hydrant and Access Unit, dated September 5, 2008.*

stations to the site, the number of major roadways serving the project site, and the fact that the project would not result in any significant impacts with regard to traffic for Option 1 or Option 2, emergency response to the project site is approximately 2.9 minutes from Fire Station No. 37 as “first-in” and not expected to fall below acceptable levels (generally 5 minutes) for either project scenario. Thus, project-related traffic is not anticipated to impair the LAFD from responding to service requests at the project site. Finally, as described in Section 3.c., the project would provide access for emergency vehicles to the project site subject to the approval of the LAFD. Therefore, the project would result in less than significant impacts with regard to fire services.

(b) Cumulative Impacts

Of the 23 related projects, 20 are located within Fire Station No. 37’s “first-in” district. These related projects could potentially generate 214 incidents per year. The proposed project under Option 1 and 2 in conjunction with related projects could therefore, generate 263 and 255 incidents per year, respectively. Based on an average of 5,512 annual incidents, this cumulative increase from both the proposed project under Option 1 and 2 and related projects would result in a respective 4.5 and 4.4 percent increase in annual incidents.

Although a cumulative increase in LAFD fire protection services would occur, cumulative project impacts on fire protection and emergency medical services would be reduced through regulatory compliance, similar to the proposed project. All related projects would comply with the LAMC Fire Code and Building Code regulations related to fire safety, access, and fire-flow. Additionally, “second call” stations would help support Fire Station No. 37 in the event of an emergency at these sites. It should also be noted that the project, as well as related projects would generate revenue to the City’s general fund in the form of net new property tax, direct and indirect sales tax, utility user’s tax, gross receipts tax, real estate transfer tax on residential initial sales and annual resales, and other miscellaneous household-related taxes. This revenue could be used to fund LAFD expenditures as necessary to offset cumulative impacts to LAFD fire protection facilities and services. Therefore, cumulative impacts on fire protection and emergency medical services would be less than significant.

(c) Mitigation Measures

With the implementation of the project design features, project construction and operation would result in less than significant impacts with regard to fire services and no mitigation measures would be required. Although not necessary to reduce impacts to a less than significant level, the following mitigation measures are recommended to ensure that potential impacts remain less than significant.

Mitigation Measure F-1: Prior to the occupancy of the hotel and/or residential component of the proposed project, the Applicant shall coordinate with LADWP to construct, or otherwise suitably guarantee to LADWP, the installation of a new fire hydrant along the Galey Avenue project frontage. The location and installation of the new fire hydrant shall be subject to the approval of the Fire Department and LADWP.

Mitigation Measure F-2: Project building plans including a plot plan shall be submitted for approval by the Los Angeles Fire Department prior to the issuance of a building permit. The plot plan shall include the following minimum design features: location and grade of access roads and fire lanes, roadway widths, distance of buildings from an edge of a roadway of an improved street, access road, or designated fire lane, turning areas, and fire hydrants.

Mitigation Measure F-3: Prior to the issuance of a building permit, the Applicant shall consult with the Los Angeles Fire Department and incorporate fire prevention and suppression features and other life-saving equipment (e.g. defibrillators) appropriate to the design of the project.

Mitigation Measure F-4: Where fire apparatus (e.g., trucks, equipment, etc.) will be driven onto the road level surface of the subterranean parking structure, that structure shall be engineered to withstand a bearing pressure of 8,600 pounds per square foot, unless otherwise approved.

Mitigation Measure F-5: The project shall comply with all applicable State and local Codes and Ordinances found in the Fire Protection and Fire Prevention Plan, as well as the Safety Plan, both of which are elements of the General Plan of the City of Los Angeles, unless otherwise approved.

(d) Level of Significance After Mitigation

In compliance with the LAMC Fire Code, the adopted Los Angeles General Plan, the General Plan Safety Element, and all other applicable ordinances and requirements, the proposed project would not result in any significant impacts on fire protection and emergency medical services. Implementation of the recommended mitigation measures would ensure that the project's impacts on the delivery of fire protection and emergency medical services to the project site remain less than significant. Thus, no significant unavoidable impacts with regard to fire protection services are anticipated.

(2). Police Protection

(a) Environmental Impacts

(i) Construction - Option 1 and Option 2

Construction-related traffic on adjacent streets could potentially affect emergency access to the project site. Construction activities may involve temporary lane closures for utility construction, crane erection, the foundation mat slab pour and flagging or stopping of traffic to accommodate trucks entering and exiting the project site during construction. As such, construction activities could increase response time for emergency vehicles to the project site and to local businesses on Wilshire Boulevard, Gayley Avenue and Kinross Avenue, due to travel time delays to through traffic. However, the LAPD would be notified of the times of day and locations of all temporary lane closures, and such closures would be coordinated so that they do not occur during peak traffic periods, to the extent feasible. The proposed project would require implementation of a Construction Staging and Traffic Management Plan per LAMC requirements. Therefore, construction-related traffic impacts to emergency access would be less than significant.

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft. However, the site is located in an area with high pedestrian and vehicular activity. In addition, the construction site would be fenced. Given the location and the on-site security, impacts with regard to police services during construction would be less than significant.

(ii) Operation

The project site is served by the West Los Angeles Community Police Station, which consists of approximately 235 sworn officers and 18 civilians within the West Los Angeles Area. The West Los Angeles Community Police Station provides police protection services to a residential population of approximately 256,464 people and reported 5,695 crimes in 2007.

Option 1 – Hotel/Condominium Project

Option 1 would generate approximately 220 new residents and hotel guests. It is estimated that the non-residential uses would generate a daytime population of approximately 83 persons and could potentially generate two additional crimes per year. Combined, the residential and non-residential portions of the project could potentially generate seven crimes per year, which is an increase of approximately 0.12 percent of the crimes reported in the West Los Angeles Area in 2007. Additionally, the increase in population from 256,464 residents to

256,745 residents in the West Los Angeles area would alter the officer to resident ratio from one officer per 1,091 residents to one officer per 1,093 residents, which is a nominal increase. As such, Option 1 could increase the demand on LAPD services.

Option 2 – Condominium Project

Option 2 would generate approximately 278 new residents. It is estimated that the non-residential uses would generate a daytime population of approximately 83 persons and could potentially generate two additional crimes per year. Combined, the residential and non-residential portions of the project could potentially generate eight crimes per year, which is an increase of approximately 0.14 percent of the crimes reported in the West Los Angeles Area in 2007. Similar to Option 1, Option 2 would also result in an increase in the officer to resident ratio from one officer per 1,091 residents to one officer per 1,093 residents, which is a nominal increase. Thus, implementation under Option 2 could increase the demand on LAPD services.

Option 1 and Option 2

Additionally, Option 1 and Option 2 would provide extensive security features on-site including 24-hour a day on-site security, a continuous video surveillance system with cameras and motion detectors, and implementation of a secure perimeter with a combination of controlled access, lighting, and landscaping to prevent loitering or access to the project site. Together, these security features would help reduce the potential for crimes, including burglaries, on-site. Therefore, due to the minimal impact the proposed project would have on police protection services, and with the implementation of the project design features outlined above, the proposed project would not result in a demand for additional police protection services that would exceed the capability of the LAPD to serve the project site. Option 1 and Option 2 would not require the addition of new police facilities or the expansion, consolidation, or relocation of an existing facility in order to maintain service. Thus, impacts to police protection services from Option 1 and Option 2 would be less than significant. To ensure implementation of these project design features, Mitigation Measure F-6 is recommended.

(b) Cumulative Impacts

All 23 related projects are located within the City of Los Angeles and in the West Los Angeles Community Police Station service area. These related projects could potentially generate 53 additional crimes per year than that which would occur if no development was to take place. Option 1 in conjunction with related projects could generate 60 additional crimes/calls per year. Option 2 in conjunction with related projects could generate 61 additional crimes/calls per year. Both options in conjunction with related projects represent an approximately 1.0 percent increase in annual crimes/calls within the service area of the West Los Angeles Community Police Station. All related projects would be reviewed by the LAPD to

ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Therefore, cumulative impacts to the existing police protection services would be less than significant.

(c) Mitigation Measures

With the implementation of the project design features, project construction and operation would result in less than significant impacts with regard to police services, and no mitigation measures would be required. Although not necessary to reduce impacts to a less than significant level, the below mitigation measures are recommended to ensure that potential impacts remain less than significant.

Mitigation Measure F-6: The Applicant shall consult with the Los Angeles Police Department Crime Prevention Unit on crime prevention features appropriate for the design of the project. The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas. These measures shall be approved by the Police Department prior to the issuance of building permits.

Mitigation Measure F-7: Upon project completion, the Applicant shall provide the West Los Angeles Community Police Station Commanding Officer with a diagram of each portion of the property, including access routes and provide additional information that might facilitate police response.

(d) Level of Significance After Mitigation

The project would result in less than significant impacts to police protection services with the implementation of project safety design features and without the above mitigation measures. The incorporation of the mitigation measures above, while not necessary to mitigate impacts to a less than significant level, would ensure that project design features would be implemented to maintain potential impacts at less than significant levels.

(3) Schools

(a) Environmental Impacts

(i) Construction

Project-related construction traffic and activities including worker travel, hauling activities, and the delivery of construction materials would not affect existing school traffic, pedestrian routes, or transportation safety in the project vicinity as there are no schools adjacent to the project site. Additionally, the proposed haul routes for construction related transport would occur via major arterials in the project vicinity and would not pass in front of any schools. Project-related construction traffic would use Wilshire Boulevard to access the I-405, which is located to the west of the site. Furthermore, construction worker-related traffic would mostly occur during off-peak hours.

Based upon the LAUSD Pedestrian Route Maps provided by the City of Los Angeles Department of Transportation, haul routes would not interfere with school pedestrian routes at Warner Elementary, Emerson Middle School and University High School due to the distance from the site and the fact that the schools are not located adjacent to potential haul routes.

Construction staging and construction worker-related vehicle parking would occur on-site or at a designated off-site location, and not on or near school property. Temporary construction worker parking would be provided off-site at Center West, which is located at 10877 Wilshire Boulevard.

(ii) Operation

Students generated by the proposed project under both options would attend Warner Elementary School, Emerson Middle School, and University High School. Build-out of the proposed project is expected to occur in 2012. Therefore, students generated by the proposed project would likely enroll in these LAUSD schools in the 2011-2012 or 2012-2013 school year. An estimated student generation under each option is provided below.

Option 1 – Hotel/Condominium Project

Option 1 would generate a total of four elementary school students, three middle school students, and three high school students. With the addition of the four elementary students from the project, Warner Elementary School would have an excess of 64 seats. With the addition of the three middle school students from the project, Emerson Middle School would have an excess of 807 seats. With the addition of three high school students from the project, University High School

would have an excess of 1,262 seats. As there is sufficient capacity in the schools to accommodate the project generated students that would occur under Option 1, the project (Option 1) would result in less than significant impact with regard to school facilities.

Option 2 – Condominium Project

Option 2 would generate a total of 19 elementary school students, 11 middle school students, and 10 high school students. With the addition of the 19 elementary students from the project, Warner Elementary School would have an excess of 49 seats. With the addition of the 11 middle school students from the project, Emerson Middle School would have an excess of 799 seats. With the addition of 10 high school students from the project, University High School would have an excess of 1,255 seats. As there is sufficient capacity in the schools to accommodate the project-generated students under Option 2, the project would result in a less than significant impact with regard to school facilities.

Option 1 and Option 2

In addition, the actual student generation under either option may be less than projected as the LAUSD Student Generation Factors does not account for the fact that project generated students may enroll at other LAUSD schools located away from their home attendance area and assumes no enrollment in private schools.

Nevertheless, the proposed project would be required to comply with SB 50, which requires payment of fees to mitigate the project's impacts on LAUSD. Payment of the SB 50 fees would ensure consistency of the proposed project with applicable regulations.

(b) Cumulative Impacts

All 23 related projects are located within the attendance boundaries of the schools serving the project site and are included in this cumulative analysis. The related projects could potentially generate 97 elementary school students, 93 middle school students, and 11 high school students. Option 1 in conjunction with related projects would, therefore, generate 101 elementary school students, 96 middle school students and 14 high school students. Option 2 in conjunction with related projects would generate 116 elementary school students, 104 middle school students, and 21 high school students.

All school facilities with the exception of Warner Elementary School would be able to accommodate the cumulatively projected number of students. Given the anticipated new students from both related projects and Option 2, as the worst case condition, Warner Elementary School would have a shortage of 48 seats (116-68). For middle school students, Emerson

Middle School would have an excess of 706 seats (810-104). University High School would have an excess of 1,244 seats (1,265-21). Therefore, the project would contribute to a cumulative impact to schools. As previously discussed, pursuant to Government Code Section 65995, the payment of the developer fees under the provisions of SB 50 would constitute full mitigation for all impacts to school facilities. Therefore, cumulative impacts to LAUSD schools serving the project site would be mitigated to a less than significant level through the payment of fees.

(c) Mitigation Measures

Operation of the proposed project would not significantly impact the school facilities that would serve the project site. While the project would contribute to a cumulative impact to schools since Warner Elementary School would operate over capacity with the proposed project under Option 2 in conjunction with the related projects, compliance with SB 50 would constitute full mitigation for significant impacts associated with cumulative development. Therefore, no mitigation measures are required.

(d) Level of Significance After Mitigation

As discussed above, the project would not result in significant impacts to existing schools during construction. In addition, the project under either development option would be adequately served by existing school services and facilities. However, the project would contribute to a cumulatively significant impact as the students generated from the project in conjunction with related projects would result in an overage of capacity at Warner Elementary School under Option 1 and Option 2. The payment of the developer fees under the provisions of SB 50 would constitute full mitigation for all impacts to school facilities. Therefore, cumulative impacts to LAUSD schools serving the project site would be mitigated to a less than significant level through the payment of fees.

(4) Libraries

(a) Environmental Impacts

The LAPL has identified the Westwood Branch Library as the library that would serve the project site. According to the LAPL, the Westwood Branch Library adequately meets the current demand for library services within the Westwood community. Based on anticipated service population estimates according to census tracts that are assigned to that branch, the expected number of persons that would be served by the Westwood Branch Library in year 2012 (buildout year of the proposed project) is 77,554 persons. To determine the service population in conjunction with the proposed project, an estimated resident population under each option is provided below.

Option 1 – Hotel/Condominium Project

Option 1 would generate a population of approximately 19 residents that would likely use the library services. As such, the expected number of residents served by the Westwood Branch Library in 2012 combined with the project's estimated population would be 77,573 people. Such a minimal increase in residents would have little to no effect on the demand for library services at the Westwood Branch Library or other libraries in the vicinity. Therefore, Option 1 would result in a nominal increase in the demand for library facilities at the Westwood Branch Library.

Option 2 – Condominium Project

Option 2 would generate a population of approximately 278 residents. As such, the expected number of residents served by the Westwood Branch Library in 2012, including the approximately 278 residents generated by the project, would be 77,832 people. The project's demand for library facilities would represent less than a one percent increase in the demand for library facilities at the Westwood Branch library. Therefore, Option 2 would result in a nominal increase in the demand for library facilities at the Westwood Branch Library.

Option 1 and Option 2

In addition, with the proximity of the West Los Angeles Regional Branch Library and its additional resources and services, the project resident's demand on nearby library resources would be further reduced through its existing services and even more so upon the future expansion of its current facility. Furthermore, all project residents would be eligible to use the wide array of technical, arts, and general libraries on the UCLA campus, which is located approximately one half mile from the project site. With the range and depth of City of Los Angeles and UCLA library resources within a short distance from the project site, the project is not anticipated to have a significant impact on local library facilities or resources.

(b) Cumulative Impacts

Of the 23 related projects, 19 projects are located within the Westwood Branch Library service area, generating a population of approximately 1,885 people. Added to the expected service population in 2012 of 77,554 people in the Westwood Community, the total service population for the Westwood Branch Library would be approximately 79,405 people. Option 1 in conjunction with the residents generated by the related projects would result in approximately 1,904 new residents, resulting in a total service population of 70,458 in the Westwood Branch Library service area. Option 2 in conjunction with the residents generated by the related projects would result in approximately 2,163 new residents, resulting in a total service population of 79,717 in the Westwood Branch Library service area. Given the other libraries located in the vicinity (i.e., Palms-Rancho Branch Library, West Los Angeles Regional Branch Library, and

libraries on the UCLA campus), usage would likely be spread across these various libraries so no one facility would be significantly impacted. Therefore, cumulative growth anticipated in the community, including the proposed project, would not cause a future population that would exceed the Westwood Branch Library expected service population. However, under both options the projected residents is overstated as it does not consider that much of the growth associated with the project and the related projects is already accounted for in the service population projections made by the LAPL. In addition, it would be expected that other projects would implement measures as necessary to ensure that their respective impacts on library facilities are less than significant. Therefore, cumulative growth anticipated in the community, including the proposed project under either development Option 1 or Option 2, would not cause a future population that would exceed the Westwood Branch Library expected service population.

(c) Mitigation Measures

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

(d) Level of Significance After Mitigation

The proposed project would not result in a significant project or cumulative impact to library services and facilities. Therefore, no mitigation measures are necessary.

(5) Parks and Recreation

(a) Environmental Impacts

(i) Public Recreation Plan

Option 1 – Hotel/Condominium Project

Under Option 1, the available open space and recreational amenities would provide project residents with the functional equivalent of a “neighborhood park” that would be customized to the recreational demands generated by the residential portion of the project. The proposed recreation and open space uses would include an outdoor pool deck and a fitness center totaling approximately 12,500 square feet (0.29 acre). Based on the estimated number of residents generated by the project under Option 1 (19 residents), the project would require 0.038 acre (0.002 acre per person) of neighborhood parkland to meet the PRP’s long-range goal and 0.019 acre (0.001 acre per person) to meet the PRP’s more attainable short- and intermediate-range goal. Option 1 would provide a total of 15,345 square feet, or approximately 0.352 acre of recreational uses and open space. As this option would include 0.352 acres of qualified open

space, including a fitness center and swimming pool, it would exceed the City's short- and intermediate-range acreage goals for neighborhood parks by 0.333 acre and the City's long-range goals for neighborhood parks by 0.314 acre. Option 1 would comply with the PRP's short- and long-range standards for parks. As Option 1 would be consistent with the PRP and would provide on-site recreational facilities, Option 1 would relieve projected demand on neighborhood and community parks and recreational facilities. Option 1 would not be expected to cause the overuse or accelerated deterioration of existing parks and recreational facilities and, as such, would have a less than significant impact with respect to the City's parks and recreational services.

Option 2 – Condominium Project

Under Option 2, approximately 278 residents would be generated by the project. Based on an increased residential population, Option 2 would require approximately 0.56 acres (0.002 acre per person) of neighborhood parkland to meet the PRP's long-range standard and 0.28 acre (0.001 acre per person) to meet the PRP's more attainable short- and intermediate-range standard for neighborhood parks. Option 2 proposes a total of 26,252 square feet of open space, including 8,237 square feet of private open space and 18,015 square feet of common open space, for a total of approximately 0.60 acre. This would exceed the City's short- and intermediate-range acreage standard of 0.56 acre for neighborhood parks by 0.032 acre and the City's long-range goals for neighborhood parks by 0.04 acre.

Option 2 would comply with the PRP's short and long-range standards parks. As Option 2 would be consistent with the PRP and would provide onsite recreational facilities, it would relieve projected demand on neighborhood and community parks and recreational facilities. Option 1 would not be expected to cause the overuse or accelerated deterioration of existing parks and recreational facilities and, as such, would have a less than significant impact with respect to the City's parks and recreational services.

Option 1 and Option 2

For both Option 1 and 2, the project's provision of on-site open space and recreational amenities would help reduce the use of community parks in the area. Nonetheless, project residents would still be expected to utilize community park amenities including sports fields, tennis courts, basketball courts, and children's play areas. Implementation of Mitigation Measure F-8 would ensure that the proposed project would comply with the parks and recreational requirements set forth by State law.

(ii) Los Angeles Municipal Code**Option 1 – Hotel/Condominium Project**

Under Option 1, the 10 condominiums would require 1,750 square feet of common open space and 500 square feet of private open space, based on LAMC Section 12.21. Of the 1,750 square feet of common open space area, a minimum of 438 square feet (25 percent) must be planted with ground cover, shrubs, or trees. The hotel and condominium development would provide 12,097 square feet of common open space, including a pool deck and a fitness center. The pool deck would incorporate at least 438 square feet of qualified landscaping, as required. In addition, Option 1 would provide approximately 3,248 square feet of private open space, for a total of 15,345 square feet of common and private open space. Option 1 would exceed the total required open space by approximately 13,095 square feet. Thus, Option 1 would comply with the open space requirements set forth in LAMC Section 12.21.

Based on the parkland dedication requirements set forth in the LAMC Section 17.12, Option 1 would be required to dedicate approximately 0.18 acres (32 percent of 0.55 acres) of parkland. Option 1 proposes to include 12,097 square feet of common open space (0.28 acres) including 8,000 square feet for the pool deck and 563 square feet for the fitness center. While the proposed project would exceed the land area requirements of Section 17.12 of the LAMC through the pool deck amenity alone, this area would not be dedicated to the City of Los Angeles. However, implementation of the mitigation measure below would ensure the provision of on-site recreational amenities and open space areas as a credit against the dedication of open space, payment of in-lieu fees, dedication of parkland, or a combination of these methods, the project would comply with the requirements established of Section 12.17. As the provision of on-site recreational facilities and open space would reduce demand on neighborhood and community parks, Option 1 would not cause the overuse or accelerated deterioration of existing parks and recreational facilities. In addition, all fees as required in LAMC Section 21.10.3 would be paid by the Applicant. Therefore, with the implementation of the proposed mitigation measure, Option 1 would have a less than significant impact with respect to parks and recreational services.

Option 2 – Condominium Project

Option 2 would require land dedication of 0.18 acres (32 percent of 0.55 acres) under LAMC Section 17.12. Option 2 would include 18,015 square feet of common open space (0.41 acres) consisting in part of 8,670 square feet for the pool deck, and 2,345 square feet for the view terraces. The pool deck and view terraces alone would exceed the area requirements of Section 17.12. However, this area would not be dedicated to the City of Los Angeles. As such, potentially significant impacts could occur. Similar to Option 1, implementation of the mitigation measure below would ensure that through the provision of on-site recreational

amenities and open space areas as a credit against the dedication of open space, payment of in-lieu fees, dedication of parkland, or a combination of these methods, the project under a condominium scenario would comply with the maximum requirements established under the Quimby Act. As the provision of on-site recreational facilities and open space would reduce demand on neighborhood and community parks, Option 2 would not cause the overuse or accelerated deterioration of existing parks and recreational facilities. In addition, all fees as required in LAMC Section 21.10.3 would be paid by the Applicant. Therefore, with the implementation of the proposed mitigation measure, Option 2 would have a less than significant impact with respect to parks and recreational services.

(b) Cumulative Impacts

Of the 23 related projects, 15 are included in this cumulative analysis. The proposed project under development Option 1 and Option 2 in conjunction with related projects could therefore generate 937 and 1,196 residents, respectively. However, all related projects with residential uses would be required to comply with the requirements of the Quimby Act, the PRP, and LAMC Sections 12.21.G and 17.12. As such, potential cumulative impacts to parks and recreational facilities would be reduced to a less than significant level.

(c) Mitigation Measures

Mitigation Measure F-8: The Applicant shall do one or more of the following: (1) dedicate additional parkland to meet the requirements of Los Angeles Municipal Code Section 17.12; (2) pay in-lieu fees for any land dedication requirement shortfall; or (3) provide on-site improvements equivalent in value to said in-lieu fees, or record a covenant restricting use of private and common open space facilities for park and recreational purposes.

(d) Level of Significance After Mitigation

Potential significant impacts to park and recreational facilities associated with the proposed project would be reduced to a level that is less than significant via compliance with Mitigation Measure F-8.

g. Transportation and Circulation

(1) Construction – Option 1 and Option 2

Construction of the project under Option 1 and Option 2 would be the same. Truck trips would be greater during the demolition phase of the construction, during excavation and grading, and during concrete pour/delivery for the project. The construction truck trips would occur at

hours that would avoid the peak hours. Also, truck queuing for excavation and/or wet construction (concrete pour/delivery) would occur along the alley and would not potentially impact any on-street parking.

Construction workers would park off-site at the Center West building located at 10877 Wilshire Boulevard or the adjacent building, Plaza La Reina, and thus would not affect parking on neighboring streets. Construction workers usually arrive and depart a project site outside of peak hour traffic (i.e., arriving prior to 7:00 A.M. and departing between 3:00 and 4:00 P.M.), thereby avoiding the generation of additional trips during the A.M. and P.M. peak hour periods. The addition of construction traffic, which would arrive and depart outside of peak hour traffic, would not cause temporary significant impacts at any of the study intersections during the construction period due to the well-functioning study intersections.

Construction activities may involve temporary lane closures for utility construction (generally limited to one lane along Gayley Avenue so through access would be maintained along the project frontage). Construction activities could increase response time for emergency vehicles to local businesses on Gayley Avenue and Kinross Avenue, due to travel time delays to through traffic. However, these interruptions in traffic flow would be infrequent and of short duration. Additionally, any work performed within the public right-of-way would require prior approval from the City and would be limited to non-peak travel periods (between the hours of 9 A.M. to 3 P.M.). As such, potential impacts to emergency access during construction would be less than significant.

Project construction would not require the temporary relocation of bus stops, or rerouting of bus lines. Thus, construction impacts related to bus lines would be less than significant.

To ensure that construction traffic impacts remain less than significant a mitigation measure that would require preparation of a Construction Staging and Management Plan is recommended. With the implementation of the Construction Staging and Management Plan, traffic impacts during construction would remain less than significant.

(2) Operation

(a) Intersections

Option 1 – Hotel/Condominium Project

Option 1 would generate 2,183 daily vehicle trips with 109 A.M. peak hour trips and 193 P.M. peak hour trips. With an adjustment for trips from the previous land uses, Option 1 would generate a net increase of 1,291 daily trips, with 61 A.M. peak hour trips (38 inbound and 23 outbound) and 84 P.M. peak hour trips (53 inbound and 31 outbound). Option 1 would not result

in a significant impact at any of the ten study intersections in the A.M. or P.M. peak hours. While Option 1 would not result in a significant impact, due to the congestion along Wilshire Boulevard the project would install a camera at the intersection of Wilshire Boulevard and Gayley Avenue, which would be connected to the City of Los Angeles Traffic Management Center.

Option 2 – Condominium Project

Under Option 2, the project would generate 1,548 daily vehicle trips with 94 A.M. peak hour trips and 165 P.M. peak hour trips. Deducting the trips associated with the previous land uses, Option 2 would result in a net increase of 656 daily trips with 46 A.M. peak hour trips (4 inbound and 42 outbound) and 56 P.M. peak hour trips (49 inbound and 6 outbound). Option 2 would not result in a significant impact at any of the ten study intersections in the A.M. or P.M. peak hours. While Option 2 would not result in a significant impact, due to the congestion along Wilshire Boulevard the project would install a camera at the intersection of Wilshire Boulevard and Gayley Avenue, which would be connected to the City of Los Angeles Traffic Management Center.

(b) Freeway System (CMP Impacts) – Option 1 and Option 2

The closest CMP arterial intersections to the project site are along Wilshire Boulevard at Sepulveda Boulevard (two blocks west of the project site) and Beverly Glen Boulevard (about a mile east of the project site). Option 1 and Option 2 would not add more than 50 trips to both these intersections during both the A.M. and P.M. peak period. Hence, no further traffic analysis is required.

The CMP freeway monitoring stations closest to the project site are on I-405, one station located north of Venice Boulevard (approximately four miles south of the project) and another station located south of Mulholland Drive (approximately five miles north of the project). Based on the project trip generation and distribution, Option 1 and Option 2 would generate fewer than 150 trips in either direction during the weekday A.M. or P.M. peak hours at the above CMP freeway monitoring stations. Thus, no further traffic analysis is required.

(c) Access and Loading - Option 1 and Option 2

Vehicular access to the site would be from Gayley Avenue via the alley for Option 1 and Option 2. Access to the project site from the alley connecting to Kinross Avenue to the north would be restricted to service and emergency vehicles only, with all loading and unloading occurring off of the alley, fully contained within the project site. The loading dock would be located near the northwest corner of the site and adjacent to the alley. Delivery trucks would generally arrive during non-peak hours (prior to the opening of the retail and restaurant uses)

and, therefore, would not conflict with vehicles from hotel guests/residents, retail customers, restaurant patrons, or other users of the alley. Valet queuing and storage would occur entirely on-site. The alley would remain public and would continue to provide unimpeded access to the other properties it currently serves. Assignment of project trips to the individual blocks in the project vicinity did not reveal any potential access problems. Impacts with regard to site access and circulation under Option 1 and Option 2 would be less than significant.

(d) Parking

Option 1 – Hotel/Condominium Project

Based on the LAMC parking requirements, the commercial uses in Option 1 would result in a requirement of 126 spaces (26 spaces for the retail and 100 spaces for the restaurant). Since the project is located in a congested parking area, a requirement of 25 parking spaces would be required for the residential units and 70 parking spaces would be required for the hotel. Combined with the required parking for the proposed commercial uses, a total of 220 spaces would be required for Option 1. Since the project would provide 260 total spaces in an underground parking facility, Option 1 would meet the LAMC parking requirements. As such, the project's parking impacts under Option 1 would be less than significant.

Option 2 – Condominium Project

Option 2 would require 288 spaces for residents and 72 spaces for guest parking for a total of 360 spaces. In addition, the commercial uses in Option 2 would require 126 spaces. Therefore, Option 2 would be required to provide a total of 486 spaces. As the project would provide 260 spaces on site, a shortfall of 226 spaces would result. However, Option 2 would provide off-site parking at Center West, which is located at 10877 Wilshire Boulevard or Plaza la Reina, which is the adjacent structure located at 10844-10852 Lindbrook Drive that is currently under construction and is expected to be completed prior to 2012, which is the project's anticipated build out date. The access driveways to either parking facility are from Lindbrook Drive and are adjacent to one another. The availability of the off-site parking that would be required for Option 2 would be assured through the recordation of a covenant prior to occupancy of the building. Approval to permit a portion of the required parking off-site would be necessary. Assuming approval of the entitlement to provide a portion of the required parking off-site, Option 2 would result in a less than significant parking impact.

(e) Pedestrian/Bicycle Safety – Option 1 and Option 2

The proposed project would locate a high-intensity use within walking distance of a range of retail, restaurant, office, entertainment and other land uses, and, as such, would create opportunities for residents to walk. The project would result in the implementation of a

landscape plan that would result in pedestrian-friendly improvements to the street frontage along Gayley Avenue. The landscape plan would include new street trees and more enhanced landscape treatment surrounding the motor court and drive entry at the intersection of Gayley Avenue and Lindbrook Drive. The project would also increase the width of the existing sidewalk along the site frontage on Gayley Avenue to create a more pedestrian friendly environment. Pedestrian crossings at the project's driveway at Gayley Avenue and Lindbrook Drive would be properly designed and clearly marked to minimize the potential for pedestrian/vehicle conflicts. The project would also not introduce any hazardous design features which could result increased potential for bicycle/vehicle conflicts. Thus, the project would result in less than significant impacts relative to pedestrian/bicycle safety.

(f) Consistency with Plans – Option 1 and Option 2

Option 1 and Option 2 would not result in significant impacts to the CMP arterial monitoring intersections or the CMP freeway monitoring locations. Thus, the project under Option 1 or Option 2 would be consistent with the CMP. Furthermore, as discussed in Section IV.D, Land Use, of this EIR, the proposed project would support the Community Plan's transportation and land use objectives and the policies of SCAG and other relevant agencies to locate new development within proximity to public transit and along a major transportation corridor. The project would not conflict with the implementation of adopted transportation programs, plans, and policies, and as such, impacts would be less than significant.

(3) Cumulative Impacts

Cumulative construction traffic impacts would occur if construction traffic from related projects would impact the same streets and access points as the proposed project. Two of the 23 identified related projects are located within proximity of the project site and thus would potentially impact the same streets and access points as the proposed project, Related Project No. 2 on 1120 Glendon Avenue and Related Project No. 4 on 900 Gayley Avenue. Related Project No. 2 is nearing completion and therefore, would not contribute to a cumulative construction traffic impact. Related Project No. 4 consists of the minor renovation/expansion of an existing retail use. As such, construction traffic volumes from the related projects are not anticipated to be significant.

The traffic analysis incorporated forecasted traffic increases due to ambient growth and the related projects through the year 2012. The proposed project would result in a less than significant cumulative impact with regard to the local street network, regional transportation system and access. Although three of the study intersections are forecasted to continue to operate at reduced levels of service (LOS E or F), the proposed project would not create significant impacts at any of the study intersections under cumulative plus project conditions.

Therefore, the project's cumulative impact on the local transportation network is less than significant.

With regard to parking and emergency access, it is anticipated that future related projects would be subject to City review to ensure that adequate parking and access would be maintained in the project vicinity. With regards to the project, Option 1 would result in a surplus of approximately 40 spaces. While Option 2 would result in a shortfall of 226 spaces on-site, these spaces would be provided off-site. Therefore, the project would not contribute to a significant cumulative parking impact.

With regard to pedestrian/bicycle safety, Related Projects Nos. 2, 3 and 4 are located within proximity to the project site, and thus could potentially affect the same pedestrian facilities or bicycle routes as the proposed project. As with the project, it is anticipated that these related projects would be subject to City review to ensure that impacts relative to pedestrian/bicycle safety would not occur. Thus, cumulative impacts relative to pedestrian/bicycle safety would be less than significant.

(4) Mitigation Measures

(a) Construction

Option 1 and Option 2 would result in less than significant traffic related impacts. Although not necessary to reduce impacts to a less than significant level, the below mitigation measure is recommended to ensure that potential impacts remain less than significant.

Mitigation Measure G-1: Prior to the start of construction, the Applicant shall develop a Construction Staging and Traffic Management Plan to be implemented during construction of the proposed project. The Construction Staging and Traffic Management Plan shall identify all traffic control measures (including the use of flag persons and appropriate detour signage) to be implemented by the construction contractor through the duration of demolition and construction activities associated with the project. The Construction Staging and Traffic Management Plan shall be subject to final approval by LADOT.

(b) Operation

(i) Parking

Impacts with regard to parking for Option 1 and Option 2 would be less than significant with the requested entitlements. Although not necessary to reduce impacts to a less than

significant level, the below mitigation measure is recommended to ensure that potential impacts remain less than significant.

Mitigation Measure G-2: Prior to issuance of a certificate of occupancy, the Applicant shall prepare and submit a valet parking operation plan, which provides information such as staffing during operation at peak and non-peak hours, security, and procedures, for review and approval by LADOT.

As Option 2 would provide a portion of the required parking off-site, the following mitigation measure is to ensure that impacts with regard to parking for Option 2 remain less than significant.

Mitigation Measure G-3: The Applicant shall submit a detailed accounting of the parking provided, required, and used in the off-site location for Option 2. Upon approval and prior to issuance of the certificate of occupancy, a copy of a covenant that shall reserve the required number of spaces at the off-site facility in perpetuity for use by the project shall be submitted to LADOT.

(5) Level of Significance After Mitigation

All construction and operational traffic impacts would be less than significant. Implementation of the recommended mitigation measures would ensure that the project's impacts regarding transportation and circulation remain less than significant. Thus, no significant unavoidable impacts with regard to traffic would occur from project implementation.

h. Utilities

(1) Water

(a) Environmental Impacts

(i) Construction Impacts

A short-term demand for water would occur during construction. The project would be constructed over an approximately 26-month period, with activities progressing through the initial excavation and grading phase, development of the building shell phase, and interior finishing phase. The demand for water for construction activities such as soil watering (i.e., for fugitive dust control), clean up, masonry, painting, and other related activities would be temporary in nature. Water used for dust control, which would not derive from treated, potable sources, would likely be recycled. Overall, construction activities would require minimal water and would not be expected to have an adverse impact on available water supplies or the existing

water distribution system. Therefore, impacts associated with short-term construction activities would be less than significant.

(ii) Operation Impacts

Option 1 Hotel/Condominium Project

Option 1 is estimated to result in a water demand of approximately 33,689 gpd, or 38 AF per year. Option 1's estimated water demand would be approximately 0.033 percent of LADWP's 2005 Urban Water Management Plan (UWMP)'s total estimated 115,000 AF increase in water demand through 2030, or less than 0.005 percent of the UWMP's estimated total water demand of 776,000 AF in 2030.

The proposed General Plan Amendment would increase density and respective water demand compared to uses allowed under the current zoning and plan designations. A comparison of Option 1 to land uses that could occupy the project site under the current General Plan designation, as represented by Alternative B (medical office building), indicates that the proposed General Plan Amendment would result in a very small increase in water demand. A medical office building allowed under current zoning would have an average water demand of 15,755 gpd (250 gpd/1,000 sf), and peak day demand of 20,165 gpd or 23 AF per year. The difference between Option 1's water demand and the medical office building's water demand indicates that Option 1 would result in a net increase of 15 AF per year. This net increase under Option 1 would represent an approximately 0.013 percent increase in the UWMP's projected increase in demand of 115,000 AF and approximately 0.002 percent of the UWMP's projected water demand of 776,000 AF for 2030. In addition, the Option 1 would incorporate water saving fixtures to further reduce demand and, as a highly urbanized use with urban landscaping, would represent an efficient end use in terms of delivery systems. As Option 1 would implement water conservation measures and represent a minute fraction of the forecasted increased in water demand under the 2005 UWMP, this option would have a less than significant impact with respect to water supply.

Option 2 – Condominium Project

Option 2 is estimated to result in a water demand of approximately 32,349 gpd or 36 AF per year. Option 2's estimated water demand would make up approximately 0.031 percent of the UWMP's total estimated increase in water demand through 2030 and less than 0.005 percent of the UWMP's total estimated water demand for 2030.

The proposed General Plan Amendment would increase density and respective water demand compared to uses allowed under the current zoning and plan designations. A comparison of Option 1 to land uses that could occupy the project site under the current General

Plan designation, as represented by Alternative B (medical office building), indicates that the proposed General Plan Amendment would result in a very small increase in water demand. A medical office building allowed under current zoning would have an average water demand of 15,755 gpd (250 gpd/1,000 sf), and peak day demand of 20,165 gpd or 23 AF per year. The difference between Option 2's water demand and the medical office building's water demand indicates that Option 2 would result in a net increase of 13 AF per year. The net increase under Option 2 would represent an approximately 0.012 percent increase in the UWMP's projected increase in demand of 115,000 AF and an approximately 0.002 percent of the UWMP's projected water demand of 776,000 AF for 2030. In addition, the Option 2 would incorporate water saving fixtures to further reduce demand and, as a highly urbanized use with urban landscaping, would represent an efficient end use in terms of delivery systems. As Option 1 would implement water conservation measures and represent a minute fraction of the forecasted increased in water demand under the 2005 UWMP, this option would have a less than significant impact with respect to water supply.

Water Infrastructure – Option 1 and Option 2

The Applicant would be responsible for providing the necessary infrastructure on the project site, as well as any extensions to connect the project site to existing water lines in the area. Option 1 and Option 2 would be able to connect to the existing 12-inch water main in Gayley Avenue and/or the 8-inch water main in Wilshire Boulevard adjacent to the project site. The Gayley Avenue and Wilshire Boulevard mains provide 2,770 gpm and 2,500 gpm, respectively, with residual pressures of 66 psi. These flows exceed the LAFD's required fair flow pressures, which are substantially greater than hotel or residential peak demand. As water infrastructure serving the project site would be adequate to serve the peak water demand from Option 1 or Option 2, the project would have a less than significant impact on existing water delivery systems.

Global Warming and Climate Change

Climate change is expected to continue, although the magnitude and nature of future changes are uncertain. Both governmental agencies and non-governmental organizations recommend that water decision-makers operate existing water systems to allow for increased flexibility. Other recommendations include incorporating climate change research into infrastructure design, conjunctively managing surface water and groundwater supplies, and integrating water and land use practices. With respect to water resources, the MWD has adopted climate change policy principles, which are reflected in MWD's Integrated Resource Plan (IRP). In addition, MWD's 2005 Regional UWMP incorporated elements to promote adaptability and flexibility, important in addressing impacts of climate change. More recently, MWD has demonstrated a commitment to addressing climate change by evaluating the vulnerability of its

water systems to global warming impacts and has developed appropriate response strategies and management tools that account for the impacts of climate change on future water supplies.

Potential impacts of climate change on California's water resources include changes in both water and air temperature, changes in precipitation patterns, and changes in sea levels that could increase pressure on Delta levees. Potential issues include a reduction of Sierra snowpack and seasonal water storage; increased rain and less snow impacting supply reliability and hydropower generation; increased variable precipitation and extreme weather events; and rising sea levels.

Although experts agree that the earth's atmosphere has warmed over the last century and will likely continue to warm in the future, how this warming will quantitatively affect future water supplies and, specifically, how any future warming will affect California water supplies remains speculative. However, as MWD and LADWP are addressing potential water shortages (a worst-case scenario of global warming) through conservation, recycling, groundwater storage, and development of new supplies by such means as desalination, and Option 1 and Option 2 would incorporate water conservation features, implement all requirements of existing and future City water conservation ordinances, and would not exceed LADWP demand forecasts to any meaningful degree, Option 1 and Option 2 would not significantly impact future water supplies that may be affected by global warming.

(iii) Consistency with Regulatory Framework

California Urban Water Management Plan Act

LADWP is consistent with the California Urban Water Management Plan Act. LADWP's UWMP is updated every five years. The next update will be available in 2010.

Senate Bill 610 and Senate Bill 221

As indicated above, Option 1 and Option 2 would not be subject to the requirements of SB 610 as neither would include the development of 500 residential units, 500,000 square feet of retail or the development of a project requiring an amount of water equivalent to or greater than that required by a 500 dwelling unit project. Additionally, Option 1 and Option 2 would not be subject to the requirements of SB 221 because both options would contain fewer than 500 dwelling units, and the project site is located within an urbanized area that has been previously developed for urban uses.

California Code of Regulations

Option 1 and Option 2 would meet or exceed the water efficiency requirements set forth by Title 20 of the CCR through incorporation of the City's recommended water conservation measures (Mitigation Measures H-1 and H-2 below), which are generally more stringent than the requirements set forth by Title 20 of the CCR. As such, Option 1 and Option 2 would be consistent with Title 20.

City of Los Angeles Water Conservation Ordinances

Option 1 and Option 2 would meet or exceed the water efficiency requirements set forth in Ordinance Nos. 172,075, 163,532 and 170,978 through incorporation of the City's recommended water conservation measures (Mitigation Measures H-1 through H-3 below), which are generally consistent or more stringent than the requirements set forth in these ordinances. As such, Option 1 and Option 2 would be consistent with applicable regulations.

Los Angeles Department of Water and Power 2005 Urban Water Management Plan

Option 1 and Option 2 would not be expected to exceed the growth parameters of the 2005 UWMP, which are based in part on General Plan buildout and are greater than the forecasted growth for the City of Los Angeles under the 2008 RTP. The 2005 UWMP water forecasts are largely based on SCAG growth forecasts derived from population and development data received from the City, as well as WSAs for major projects. The slower growth indicated by the gap between the 2005 UWMP and the 2008 RTP is an indication that buildout of the General Plan and individual Community Plans as originally envisioned, is not occurring. The gap between the UWMP's growth forecast and the RTP's growth forecast indicates that the 2005 UWMP would have available capacity with respect to actual future growth. As both Options 1 and 2 represent a very small portion of the difference between the 2005 UWMP's and the 2008 RTP's growth forecasts, Option 1 and Option 2 would not exceed the forecasted water demand of the 2005 UWMP.

(b) Cumulative Impacts

(i) Water Demand

Twenty-three related projects would cumulatively contribute to water demand in the project area. Related projects in conjunction with the proposed project would generate a total average water demand of approximately 201,524 gpd or 225 AF per year under Option 1 and 200,184 gpd or 224 AF under Option 2. LADWP's 2005 UWMP projects yearly water demand to reach 776,000 AF by 2030. With the anticipated water demand increase of 223 or 224 AF per

year from the development of the proposed project (Option 1 and Option 2) and related projects, the demand for water would fall within the available and projected water demand of LADWP's 2005 UWMP. The UWMP accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses.

The City of Los Angeles is faced with various ongoing challenges in securing its future water supplies due to, among other things, potential droughts, environmental restrictions, and climate change. The City Water Supply Action Plan is intended to serve as a blueprint to address these challenges and create sustainable sources of water for the City of Los Angeles, including reduced dependence on imported supplies. The plan outlines short-term and long-term conservation and recycling strategies that include increased water conservation through reduction of outdoor water use, expanded groundwater storage, and the use of technology that maximizes water recycling, enhances stormwater capture, and accelerates clean-up of the groundwater basin. Through the implementation of local strategies, and programs in place or anticipated by the LADWP and MWD, it is expected that the LADWP would meet the future water demand set forth in the UWMP. Therefore, cumulative impacts related to water demand would be less than significant.

(ii) Water Infrastructure

Development of Option 1 and Option 2 in conjunction with the related projects would cumulatively increase demand on the existing water infrastructure system. However, each related project would be subject to discretionary review to ensure that the existing public utility facilities would be adequate to meet the domestic and fire water demands of each project. Furthermore, LADWP as well as the City of Los Angeles Department of Public Works would conduct ongoing evaluations to ensure adequate facilities. Therefore, cumulative impacts on the water infrastructure system under Option 1 and Option 2 would be less than significant.

(iii) Global Warming and Water Supply

Complex physical, chemical, and atmospheric mechanisms involved in global climate change that make it difficult to predict what the effects of global climate change, particularly at a State or local level. Due to this unpredictability, the secondary effects that global climate change may have on water supplies for a given region is even more difficult to predict. The science of global warming is still evolving and has not reached a point where it can be quantified and incorporated into water delivery projections. However, water providers, including the MWD and LADWP are developing water supply and management strategies to address a balance between water shortage and abundance and to develop new water supplies that are less dependent on climactic conditions, such as water derived from efficient desalination. The related projects, which would incorporate water conservation features as required by current and future City ordinances,

would not exceed the expected growth in water demand under the UWMP. Therefore, it is not expected that Option 1 and Option 2 would contribute to a significant cumulative impact on future water supplies that may be impacted by global warming.

(c) Mitigation Measures

Option 1 and Option 2 would result in less than significant impacts related to domestic water supply and water infrastructure and no mitigation measures would be required. Although not necessary to reduce impacts to a less than significant level, the following mitigation measures are recommended to ensure that potential impacts remain less than significant.

Mitigation Measure H-1: For the commercial uses on the project site, the Applicant shall (unless otherwise required and to the satisfaction of the City of Los Angeles Department of Building and Safety):

- Install high-efficiency toilets (maximum 1.28 gallons per flush), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gallon per flush), including no-flush or waterless urinals, in all restrooms as appropriate. Rebates may be offered through the City of Los Angeles Department of Water and Power to offset portions of the costs of these installations.
- Install restroom faucets with a maximum flow rate of 1.5 gallons per minute.
- Install restroom faucets of a self-closing design (i.e., that would automatically turn off when not in use).
- Prohibit the use of single-passing cooling equipment. Prohibition of such equipment shall be indicated on the building plans and incorporated into tenant lease agreements.

Mitigation Measure H-2: For the residential uses on the project site, the Applicant shall (unless otherwise required and to the satisfaction of the City of Los Angeles Department of Building and Safety):

- Install a demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwellings.
- Install high-efficiency toilets (maximum 1.28 gallons per flush), including dual-flush water closets in all restrooms as appropriate. Rebates may be offered through the City of Los Angeles Department of Water and Power to offset portions of the costs of these installations.

- Install no more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- Install and utilize only high-efficiency clothes washers (water factor of 6.0 or less) in the project, if proposed to be provided in either individual units and/or in a common laundry room(s). If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance. Rebates may be offered through the Los Angeles Department of Water and Power to offset portions of the costs of these installations.
- Install and utilize only high-efficiency Energy Star-rated dishwashers in the project, if proposed to be provided. If such appliance is to be furnished by a tenant, this requirement shall be incorporated into the lease agreement, and the applicant shall be responsible for ensuring compliance.

Mitigation Measure H-3: In addition to the requirements of Ordinance No. 170,978 (Landscape Ordinance), any landscaping for the proposed project shall incorporate the following:

- Weather-based irrigation controller with rain shutoff;
- Matched precipitation (flow) rates for sprinkler heads;
- Drip/microspray/subsurface irrigation where appropriate;
- Minimum irrigation system distribution uniformity of 75 percent;
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials; and
- Use of landscape contouring to minimize precipitation runoff.

Mitigation Measure H-4: The project developer shall ensure that the landscape irrigation system be designed, installed, and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize overspray onto walkways and streets.

(d) Level of Significance after Mitigation

Options 1 and 2 would have a less than significant on water supply and infrastructure. Implementation of the recommended mitigation measures would ensure that impacts would remain less than significant.

(2) Wastewater**(a) Construction – Option 1 and Option 2**

During construction of the project, which would be the same for both Option 1 and Option 2, a negligible amount of wastewater would be generated by construction workers. However, wastewater would not be disposed on-site as portable toilets would be provided by a private company and the waste would be disposed of off-site. Wastewater generation from construction activities under Option 1 or Option 2 is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction under either option is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled capacity of any one treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements because construction wastewater generated would be negligible. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant under both Option 1 and 2 and no mitigation measures are required.

(b) Operation**(i) Wastewater Generation and Infrastructure****Option 1 – Hotel/Condominium Project**

Option 1 would generate on average approximately 31,700 gpd (0.032 mgd) of wastewater with a peak flow of 53,891 gpd (0.054 mgd). Based on the gauging data provided by Bureau of Sanitation, the design capacity (50 percent capacity) of the existing 18-inch sewer line in Gayley Avenue is 2.18 mgd. According to the Bureau of Sanitation, the current flow level (d/D) in the 18-inch line is approximately 13 percent of capacity or approximately 0.57 mgd. Option 1 would generate approximately 0.032 mgd on an average day and 0.054 mgd during peak flow. These flows would increase the current flow in the 18-inch line to approximately 0.602 mgd on an average day, and 0.624 mgd on a peak flow day. As the project, combined with existing flow in the Gayley Avenue line, would not cause total wastewater flow to exceed the line's design capacity (2.18 mgd), it would have a less than significant impact with respect to existing sewer line infrastructure.

Option 2 – Condominium Project

Option 2 would result in an estimated average generation of approximately 30,360 gpd (0.030 mgd) of wastewater with a peak flow of 51,613 gpd (0.052 mgd). Based on the gauging

data provided by Bureau of Sanitation, the design capacity (50 percent capacity) of the existing 18-inch sewer line in Gayley Avenue is 2.18 mgd. According to current gauging information, the flow level (d/D) in the 18-inch line is at approximately 13 percent capacity or approximately 0.57 mgd. Option 2 would generate approximately 0.030 mgd on an average day and 0.052 mgd during peak flow. These flows would increase the current flow in the 18-inch line to approximately 0.60 mgd on an average day and 0.620 mgd on a peak flow day. As the project, combined with existing flow in the Gayley Avenue line, would not cause total wastewater flow to exceed the line's design capacity (2.18 mgd), it would have a less than significant impact with respect to existing sewer line infrastructure.

(ii) Wastewater Treatment

Wastewater generated by the project would ultimately be conveyed via the Hyperion Treatment Conveyance System to HTP. The ADWF for the Hyperion Treatment Conveyance System service area is projected to be approximately 477.3 mgd in 2010, 492.3 mgd in 2015, and 511.3 mgd in 2020. These forecasted increases in wastewater flows without the project are well within the current Hyperion Treatment Conveyance System treatment capacity of 550 mgd. According to these projections and based on existing capacity, the Hyperion Treatment Conveyance System would still have a capacity of 73 mgd (or 13 percent) in 2010, 58 mgd (or 10 percent) in 2015, and 39 mgd (or 7 percent) in 2020.

Option 1 – Hotel/Condominium Project

Wastewater generation from Option 1 would contribute an average wastewater flow of 31,700 gpd (0.032 mgd) and a peak flow of 53,891 gpd (0.054 mgd), which could be accommodated within the projected available treatment capacity of the Hyperion Treatment Conveyance System for 2015 (58 mgd) and 2020 (39 mgd) without considering the 20 mgd increase in capacity to 570 mgd expected with implementation of the IRP improvements.

In addition, the project would be required to pay a connection fee through the Connection Fee Program that would ensure that all users pay a fair share for necessary expansions of the sewer system, additional improvements to conveyance, treatment, and disposal facilities. As such, the increase in wastewater flows generated by Option 1 would have a less than significant impact on wastewater treatment facilities and no mitigation measures are necessary.

Effluent conveyed to HTP would not have a significant affect on the Santa Monica Bay as HTP continually monitors all effluent, currently meets applicable water quality standards, and is required to comply with water quality standards established for beneficial uses.

Option 2 – Condominium Project

Under Option 2, the project would contribute an average wastewater flow of 30,360 gpd (0.030 mgd) and a peak flow of 51,613 gpd (0.052 mgd) and similar to Option 1, such a service demand could be accommodated within the projected available treatment capacity of the Hyperion Treatment Conveyance System for 2015 (58 mgd) and 2020 (39 mgd) without considering the 20 mgd increase in capacity to 570 mgd.

The project under Option 2 would be required to pay a connection fee through the Connection Fee Program for its contribution to wastewater flows. As such, the increase in wastewater flows generated by Option 2 would have a less than significant impact on wastewater treatment facilities and no mitigation measures are necessary.

(iii) Consistency with Regulatory Framework

City of Los Angeles General Plan Framework

Chapter 9, Infrastructure and Public Services, of the City's General Plan Framework identifies goals, objectives, and policies for utilities in the City including wastewater collection and treatment. In accordance with Goal 9A, Option 1 and Option 2 would connect to the existing sewer system, which has been shown to have adequate capacity to meet the demands of the project. Therefore, the project would be consistent with the goals of the General Plan Framework.

City of Los Angeles Municipal Code

The Applicant would be subject to City Ordinance No. 166,060 requiring a determination by LADPW that there is allotted sewer capacity available for the proposed project. LADWP has determined that it has sufficient capacity to accommodate the proposed project. Therefore, the project would be in compliance with City Ordinance No. 166,060.

The Applicant would also be subject to City Ordinance No. 171,036, requiring the payment of wastewater connection fees based upon the strength of the project's wastewater flow in addition to its volume. These fees would be paid prior to the project's connection to the City's sewer system. Therefore, with the payment of such fees, the project would be in compliance with City Ordinance No. 171,036.

(3) Cumulative Impacts

The estimated wastewater generation associated with 23 related projects on average is approximately 168,305 gpd (0.17 mgd) with a peak flow of 290,181 gpd (0.29 mgd). Option 1 would contribute 31,700 gpd (0.032 mgd) with a peak flow of 53,891 gpd (0.054 mgd) to this estimated generation for a total average cumulative flow of 200,005 gpd (0.20 mgd) and a peak flow of 344,072 gpd (0.34 mgd) as shown in Table H.2-4. Option 2 would contribute 30,360 gpd (0.030 mgd) with a peak flow of 51,613 gpd (0.052 mgd) to this estimated generation for a total average cumulative flow of 198,665 gpd (0.199 mgd) and a peak flow of 341,794 gpd (0.34 mgd).

The Hyperion Treatment Conveyance System has a current capacity of 550 mgd and a current ADWF of approximately 410 mgd. By 2015 and 2020, the ADWF of the Hyperion Treatment Conveyance System is projected to be 492.3 mgd and 511.3 mgd, respectively. For 2015 and 2020, the cumulative wastewater flows would increase the projected ADWF to 492.5 mgd, and 511.5 mgd, respectively under both options. The ADWF projections in conjunction with the cumulative wastewater estimate from related projects represents a conservative analysis as the ADWF projections already take into account future population growth, including growth such as that represented by related projects.

As with the project, each related project proposing to connect to the City sewer system would be subject to City Ordinance No. 166,060 requiring a determination by LADPW that there is allotted sewer capacity available for the project. Furthermore, implementation of the IRP and completion of the “Go-Projects” including improvements throughout the Hyperion Treatment Conveyance System consisting of the expansion of the TWRP and improvements at HTP, LAGWRP, and the wastewater collection system, capacity of the Hyperion Treatment Conveyance System would be increased to 570 mgd. The IRP would increase the treatment capacity of TWRP and treatment process at LAGWRP, which would result in less bypass flows to HTP for processing. As such, LADPW anticipates ample wastewater treatment services to the City of Los Angeles and contracting cities through 2020. Therefore, cumulative impacts associated with wastewater treatment would be less than significant and no mitigation measures are required.

HTP currently meets applicable water quality standards as set forth by the NPDES. As such, the cumulative wastewater effluent discharged to the Santa Monica Bay would have a less than significant impact on water quality. Implementation of the IRP, upgrades in the advanced treatment processes at HTP, and continual monitoring by the EMD would ensure that effluent discharged into Santa Monica Bay are within applicable limits. Thus, cumulative impacts on Santa Monica Bay water quality would be less than significant and the project’s contribution to the impact would not be cumulatively considerable.

(4) Mitigation Measures

Potential impacts related to wastewater due to construction and operation of the project would be less than significant. Therefore, no mitigation measures are required.

(5) Level of Significance After Mitigation

The project would result in less than significant impacts with regard to wastewater and, therefore no mitigation measures are required.