FORM GEN. 160 (Rev. 6-80)

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

December 16, 2014

TO: Honorable City Council

FROM: Nicholas Hendricks, City Planner
Department of City Planning
200 North Spring Street, Room 750
Los Angeles, CA 90012

SUBJECT: Transmittal of Environmental Document (Errata) for Case Nos. ENV-2004-6269-SFEIR-Errata; CPC-2013-210-SPP-SPR-MSC; CPC-2009-817-DA-M1.

For your record, please see attached Errata document for the Century City Center Project's Subsequent Final Environmental Impact Report. Thank You.

Sincerely,

Nicholas Hendricks
City Planner
Major Projects

DEPARTMENT OF
CITY PLANNING
200 N. SPRING STREET, ROOM 525
LOS ANGELES, CA 90012-4801
AND
6262 VAN NUYS BLVD., SUITE 351
VAN NUYS, CA 91401

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December 12, 2014

SUPPLEMENTAL NOTICE OF COMPLETION AND AVAILABILITY OF FINAL SUBSEQUENT ENVIRONMENTAL IMPACT REPORT NO. ENV-2004-6269-EIR-SUP-1 STATE CLEARINGHOUSE NO. 2005051145

To: Commenters, Owners of Property and Occupants, and Other Interested Parties

Project Name: Century City Center Development

Applicant: Century City Realty, LLC

Site Location: 1950 Avenue of the Stars in the Century City community of the City of Los Angeles, CA 90067

Community Plan Area: West Los Angeles

Council District: 5

The Final Subsequent Environmental Impact Report ("EIR") for the Century City Center Development ("Project") was published on October 10, 2013. The Final Subsequent EIR comprises the second and final part of the Subsequent EIR for the Project and supplements the Draft Subsequent EIR previously circulated for public review from March 14, 2013 to April 29, 2013. Comments received during the public review period and the City of Los Angeles's ("City") responses to those comments can be found in the Final Subsequent EIR. The City has prepared an Errata to clarify and correct information in the Final Subsequent EIR. The Errata includes minor edits and revisions to the Final Subsequent EIR, as well as new and revised appendices to the Final Subsequent EIR. The revisions provided in the Errata do not contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect, and the information clarified in the Errata does not present a feasible Project alternative or mitigation measure considerably different from others previously analyzed in the Final Subsequent EIR. This Supplemental Notice of Completion and Availability is to advise you that the Errata and additional appendices have been added to the Final Subsequent EIR.

PROJECT DESCRIPTION: Century City Realty, LLC (the "Applicant") proposes to modify a project previously approved by the City of Los Angeles in 2006, which permitted the development of approximately 483 residential condominiums in two 47-story towers and one 12-story building for a total of approximately 1.3 million square feet (the "Approved Project") on an approximately 5.5-acre site at 1950 Avenue of the Stars, Los Angeles, California, which is located at the northeast corner of Avenue of the Stars and Constellation Boulevard in Century City (the "Project Site"). The Applicant originally proposed to modify the Approved Project to allow for the construction of one 37-story (approximately 570 feet in height at site perimeter or 849 feet above mean sea level), approximately 700,000-square-foot office building, approximately 25,830 square feet of low-rise, one- and two-story office space, an approximately 1,300-square-foot Mobility Hub, a Transit Plaza, approximately 4,120 square feet of ancillary retail, and a partially subterranean parking structure with approximately 1,579 stalls, and a 2.14-acre green roof deck (the "Modified Project"). In total, the Modified Project included approximately 731,250 square feet of floor area, which represents a decrease of 561,108 square feet as compared to the Approved Project. At its hearing on June 12, 2014, the City Planning Commission approved Alternative 9 (the "Enhanced Retail Alternative") as described in the Project's Subsequent EIR. The Applicant has accepted approval of the Enhanced Retail Alternative in lieu of the Modified Project. The Enhanced Retail Alternative would include the construction of one 37-story, 700,000 square foot office building, approximately 10,338 square feet of low-rise, one- and two-story office space, a 2,389-square foot Mobility Hub, a 39,037-square foot Transit Plaza, approximately 17,102 square feet of ancillary retail, and a partially subterranean parking structure with 1,530 stalls. The Enhanced Retail Alternative would also include a 2.14-acre landscaped green roof deck on the parking structure which would be open to members of the public between 6:00 a.m. – 8:00 p.m., seven days per week, as an additional public amenity. In total, the Enhanced Retail Alternative would comprise approximately 729,829 square feet of occupiable square footage. This represents a reduction of approximately 1,421 total square feet as compared with the Modified Project and a reduction of approximately 562,529 total square feet as compared with the Approved Project.

As noted previously, it is anticipated that approvals required for the Project would include, but may not be limited to, the following:

- Project Permit Compliance Review
- Alternative Calculation of Trip Generation Factors pursuant to Section 6 of the Century City North Specific Plan
- Amendment of the Development Agreement between Century City Realty, LLC and the City of Los Angeles dated September 16, 2009, as approved by City Council Ordinance No. 180,765
- Certification of a Subsequent EIR
- Revised existing access covenant and agreement with the City, and other covenant agreements as necessary
- Approval of enhanced street planting
- Ministerial permits and approvals, such as grading permits, excavation permits, foundation permits, building permits, and public works permits

- Submittal of a Notice of Intent to the State Water Resources Control Board to comply with the Construction National Pollution Discharge Elimination System General Permit

- Storm sewer discharge permit and a Temporary Construction Dewatering Permit from the Regional Water Quality Control Board

- Notice of Proposed Construction or Alteration/Determination of No Hazard to Air Navigation from the Federal Aviation Administration

- Any necessary permits from DOGGR with regard to closed on-site wells

- Haul Route permit

- Other permits and approvals to be requested or as deemed necessary to implement the Modified Project

ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS: As noted previously, based on the analysis contained in the Subsequent EIR, the Project could result in significant unavoidable impacts to traffic (operational impacts to intersections) and noise (construction-related cumulative impacts). In addition, although mitigation is available to reduce Project impacts to access and circulation during operations (installation of a traffic signal at private driveways or installation of a median that would limit the Project's primary driveway to right-turns in and out) to a less than significant level, if this mitigation cannot be implemented, a significant unavoidable impact to traffic access could result.

All other potential impacts identified would be mitigated to less than significant levels. Other issues addressed in detail in the Subsequent EIR that are not anticipated to result in significant unavoidable impacts include: land use; aesthetics; air quality; climate change; hazards and hazardous materials; hydrology and water quality; population, housing, and employment; public services (fire protection, police protection, public schools and library services); utilities (water supply, wastewater, and solid waste); energy (electricity and natural gas); and geology and soils. The Project was determined not to result in significant impacts in the following environmental issue areas, which are not addressed in detail in the Subsequent EIR: agriculture and forestry resources; biological resources; cultural resources; mineral resources; and parks and recreation.

DOCUMENT REVIEW: If you wish to review a copy of the Final Subsequent EIR, including the Errata, or the documents referenced in the Final Subsequent EIR, including the additional appendices added to the Final Subsequent EIR with the Errata, you may do so at the City of Los Angeles, Department of City Planning at: 200 North Spring Street, Room 750, Los Angeles, CA 90012. Please call ahead to make an appointment. Copies of the Final Subsequent EIR are also at the following Library Branches:

- *Los Angeles Central Library*: 630 West 5th Street, Los Angeles, CA 90071

- *Robertson Branch Library*: 1719 S. Robertson Blvd., Los Angeles, CA 90035

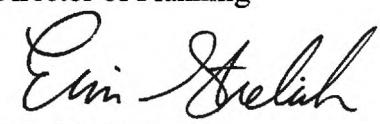
- *West Los Angeles Regional Library*: 11360 Santa Monica Blvd., Los Angeles, CA 90025

- *Palms-Rancho Park Branch Library*: 2920 Overland Ave., Los Angeles, CA 90064
- *Westwood Branch Library*: 1246 Glendon Ave., Los Angeles, CA 90024

The Project Site is located near the jurisdiction of the City of Beverly Hills. The Final Subsequent EIR, including the Errata and additional appendices, will also be available in digital format for review at this library that is outside the City of Los Angeles Public Library system, due to its proximity to the Project Site: (1) Beverly Hills Main Public Library, 444 N. Rexford Dr., Beverly Hills, CA 90210.

The Final Subsequent EIR, including the Errata and additional appendices, may also be viewed online at the Department of City Planning's website: http://cityplanning.lacity.org/ (click on "Environmental" and then "Final EIR"). The Final Subsequent EIR can be purchased on cd-rom for $7.50 per copy. Contact Erin Strelich of the City of Los Angeles at (213) 978-1351 to purchase one or for other inquiries.

Michael J. LoGrande
Director of Planning



Erin Strelich
EIR Unit

CITY OF LOS ANGELES
DEPARTMENT OF CITY PLANNING
ENVIRONMENTAL REVIEW SECTION
200 N. SPRING Street, #750, Los Angeles, CA 90012

December 12, 2014

TO: Library Reference Desk

FROM: Erin Strelich, Planning Assistant
Environmental Review Section, Department of City Planning

SUBJECT: EIR No.: ENV-2004-6269-EIR-SUP1

State Clearinghouse No.: 2005051145

Project Name: Century City Center

Location: 1950 Avenue of the Stars, APNs 4319002053, 4319002054, 4319002055, and 4319002059

In accordance with the City's Guidelines for implementation of the California Environmental Quality Act of 1970 adopted by the City Council and revised on July 31, 2002, the attached CD copy of an Errata for the Century City Center Subsequent Environmental Impact Report (SEIR) is being placed with your library for review by interested persons. The Errata should be kept with the Draft and Final portions of the SEIR as they collectively represent the complete SEIR. If you wish to obtain a hard copy for library reference, or to obtain additional CD copies, please phone the Environmental Review Section at 213-978-1351. Please keep this document on file until the dated noted below.

( ) This EIR may be discarded after March 7, 2015

(X) This case is controversial and may be appealed. Before discarding, please check with this office.

Erin Strelich, City Planning Associate
EIR Unit, City Planning Department

Final Subsequent Environmental Impact Report Errata

Century City Center
City of Los Angeles
SCH No. 2005051145

LSA

LSA ASSOCIATES, INC.

NOVEMBER 2014

FINAL SUBSEQUENT

ENVIRONMENTAL IMPACT REPORT

ERRATA

CENTURY CITY CENTER

LOS ANGELES, CALIFORNIA

SCH NO. 2005051145

Submitted to:

City of Los Angeles
200 North Spring Street
Los Angeles, California 90012
(213) 482-7077

Prepared by:

LSA Associates, Inc.
20 Executive Park, Suite 200
Irvine, California 92614
(949) 553-0666

Project No. CCY1101

LSA

November 2014

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TABLES

1.0 INTRODUCTION

The City of Los Angeles (City) has prepared this Errata to clarify and correct information in the Final Subsequent Environmental Impact Report (Final Subsequent EIR or FSEIR) for Century City Center (proposed Modified Project). This Errata includes minor edits and revisions to the Final Subsequent EIR, and the revisions provided herein do not contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the proposed Modified Project or a feasible way to mitigate or avoid such an effect. Additionally, information clarified in this Errata does not present a feasible Project alternative or mitigation measure considerably different from others previously analyzed in the Subsequent EIR.

All of the information added to the Final Subsequent EIR merely clarifies, corrects, adds to, or makes insignificant modifications to information in the Draft Subsequent EIR. The new or modified information added to the Final Subsequent EIR in this Errata is not "significant," and recirculation of the Draft Subsequent EIR is not required (see CEQA Guidelines Section 15088.5). The City has reviewed the information in this Errata and has determined that it does not change any of the findings or conclusions of the Final Subsequent EIR and does not constitute "significant new information" pursuant to CEQA Guidelines Section 15088.5.

In conformance with Section 15121 of the CEQA Guidelines, the Final Subsequent EIR, technical appendices and reports thereof, together with the Errata, are intended to serve as documents that will generally inform the decision-makers and the public of environmental effects of the Project. This Errata, combined with the Introduction and Summary, Corrections and Additions, Mitigation Monitoring Program, Enhanced Retail Alternative (Alternative 9), and Response to Comments, comprises the Final Subsequent EIR.

Changes to the Final Subsequent EIR are indicated in this section under the appropriate Draft Subsequent EIR section, Final Subsequent EIR section, comment code, or appendix heading. With the exception of changes to tables and figures, deletions are shown with strikethrough (~~strikethrough~~) and additions are shown with underline (<u>underline</u>).

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2.0 ERRATA

Table of Contents

The following Appendices have been added to the Final Subsequent EIR:

Appendix AM: Memorandum from Gibson Transportation Consulting, Inc. to LSA Associates, Inc. regarding Estimation of Average Trip Lengths To and From Century City Center (October 6, 2014)
Appendix AN: Supplemental CalEEMod Information for Section 3.0, Additional Information, Air Quality Modeling (Construction and Operations) and Climate Change (Business-as-Usual Analyses)
Appendix AO: Employee Density Survey Results
Appendix AP: LADOT Assessment Letter for Alternative 9
Appendix AQ: Memorandum from Gibson Transportation Consulting, Inc. to LSA Associates, Inc. regarding Analysis of Alley Access to Century City Center (September 30, 2014)

Draft Subsequent EIR – 1.0 Executive Summary

Mitigation Measure 4.2.2 (page 1-44) is revised as follows:

Mitigation Measure 4.2.2: This Mitigation Measure is applicable to all trip generation rates. The Applicant shall work with the Century City Transportation Management Organization (CCTMO) to develop a high-quality mobile (cell phone) application for the use of residents, employees, and visitors to the Study Area, and Century City in particular. The application shall be developed fully at the Applicant's sole expense, and shall be maintained at the Applicant's sole expense for a period of ten (10) years. This application shall:

- Alert drivers of congestion on key routes serving Century City
- Identify alternate routes that bypass congestion
- Identify real-time visitor parking availability within Century City
- Identify transit options for travel to and from Century City

The application ~~would~~ shall be promoted by the CCTMO and the Applicant and ~~would~~ shall help to relieve congestion, reduce vehicle miles travelled (VMT) through the identification of available parking, and promote transit usage by suggesting non-automotive methods of travel for a proposed route. The application ~~would~~ shall help reduce peak-hour vehicular trips throughout the Study Area, and particularly within Century City. The application shall not direct traffic through residential neighborhoods.

Draft Subsequent EIR – 4.2 Traffic and Circulation

Page 4.2-35, first full paragraph, is revised as follows:

Modified Project Trip Generation with Empirical Rate. The Institute of Transportation Engineers *Trip Generation Handbook, 2nd Edition* (ITE, 2004) states that empirical trip generation studies of local sites should be conducted for developments located in downtown settings, served by significant public transportation, where extensive transportation demand management is in effect, or where specific circumstances make a site noticeably different from the average rates published in the latest edition of ITE *Trip Generation.* High-rise office towers in Century City have different trip-generating characteristics than the typical office buildings surveyed for Trip Generation, 8th Edition. In general, office towers in Century City have a lower level of employee density and a higher rate of employees on alternative work schedules that reduce the number of trips generated during the peak hours. This is especially true of the entertainment, financial services, and legal professionals that are prevalent in Century City office buildings, who do not typically follow a 9:00 a.m. to 5:00 p.m. work schedule. In contrast, the typical office building surveyed for *Trip Generation, 8th Edition* is in a suburban location with low transit availability and is far smaller than the proposed Modified Project. Additionally, nearly all surveys of large office buildings (buildings larger than 400,000 square feet, which tend to generate trips at lower rates than smaller buildings) surveyed in Trip Generation, 8th Edition were conducted prior to publication of *Trip Generation, 5th Edition* (ITE, 1991) in 1991, when typical office employee density was higher and when alternative work schedules were far less common. The survey of employee density in Century City referenced in Appendix F of the Transportation Study and included as Appendix AO to this Subsequent EIR is a copy of the survey results the Applicant received from the Century City Chamber of Commerce, which was also provided to the LADOT.

Mitigation Measure 4.2.2 (page 4.2-204) is revised as follows:

Mitigation Measure 4.2.2: This Mitigation Measure is applicable to all trip generation rates. The Applicant shall work with the Century City Transportation Management Organization (CCTMO) to develop a high-quality mobile (cell phone) application for the use of residents, employees, and visitors to the Study Area, and Century City in particular. The application shall be developed fully at the Applicant's sole expense, and shall be maintained at the Applicant's sole expense for a period of ten (10) years. This application shall:

- Alert drivers of congestion on key routes serving Century City
- Identify alternate routes that bypass congestion
- Identify real-time visitor parking availability within Century City
- Identify transit options for travel to and from Century City

The application ~~would~~ shall be promoted by the CCTMO and the Applicant and ~~would~~ shall help to relieve congestion, reduce vehicle miles travelled (VMT) through the identification of available parking, and promote transit usage by suggesting non-automotive methods of travel for a proposed route. The application ~~would~~ shall help reduce peak-hour vehicular trips throughout the Study Area, and

particularly within Century City. The application shall not direct traffic through residential neighborhoods.

Draft Subsequent EIR – 4.8 Noise

Page 4.8-19, last paragraph, is revised as follows:

LSA conducted an ambient noise survey in the Project site vicinity at eight locations on February 22, 2012. Table 4.8.K lists these receptor locations. Figure 4.8.1 depicts the noise monitoring locations. The noise measurements were conducted between 10:30 a.m. and 3:30 p.m. LSA also conducted nighttime noise measurements on February 29 and March 1, 2012. The nighttime noise measurements were conducted between 10:00 p.m. on February 29, 2012, and 1:00 a.m. on March 1, 2012. In February/March 2012, each ~~Each~~ noise measurement was conducted for 15 minutes except for the nighttime noise measurements in the residential areas (Locations 1, 3, and 6) and at Beverly Hills High School (Location 8), where there is little traffic or other noise. ~~Table 4.8.K lists these receptor locations.~~ Table 4.8.L lists the ambient noise levels measured at these receptor locations. ~~Figure 4.8.1 depicts the noise monitoring locations.~~ LSA conducted follow up ambient noise monitoring between 10:10 p.m. on December 10, 2013 and 12:11 a.m. on December 11, 2013, at the four measurement locations where nighttime ambient noise measurement was previously conducted for 10 minutes each in February/March 2012 (Locations 1, 3, 6, and 8). In December 2013, the noise measurements were taken for 15 minutes at each location. The noise measurement data from December 2013 is provided in the Additional Information Chapter of the Errata to the Final Subsequent EIR. A comparison of 2012 and 2013 ambient noise levels provided in the Errata shows that three of the four locations recorded a 0.6 to 2.4 dBA higher nighttime ambient noise level (measured for 15 minutes in 2013 data) than those measured in 2012 (measured for 10 minutes). These locations are at or near a residential area. One location – Beverly Hills High School – recorded a 4.3 dBA lower nighttime ambient noise level (measured for 15 minutes in 2013 data) compared to the 2012 ambient noise (measured for 10 minutes). The latter was due to a lighter traffic in the area during the follow-up noise measurement period.

Draft Subsequent EIR – 4.10.A Fire

Page 4.10.A-20, second paragraph, third sentence, is revised as follows:

In addition, the Los Angeles Department of Water and Power is currently installing a new regulator pump station for Century City, which is anticipated to be completed in late 2014 ~~2012/2013~~.

Page 4.10.A-32, second paragraph, fourth sentence, is revised as follows:

In addition, the Los Angeles Department of Water and Power is currently installing a new regulator pump station for Century City, which is anticipated to be completed in late 2014 ~~2012/2013~~.

Draft Subsequent EIR – 4.10.C Schools

Page 4.10.C-21, second full paragraph, is revised as follows:

> In comparing the findings in the 2006 EIR, the proposed Modified Project would generate eight more students than the Approved Project (refer to Table 4.10.C.E). However, as discussed above, the increased enrollment attributable to the proposed Modified Project would not exceed existing school capacities at any of the schools serving the Project site, and development of the proposed Modified Project would not require the construction of new facilities, a major reorganization of students or classrooms, or changes to the single-track school calendar at either of the middle schools or high school. However, based on LAUSD projections, increased enrollment attributable to the proposed Modified Project would contribute to Westwood Charter Elementary School exceeding its operational capacity in the 2013–2014 school year because LAUSD considers a school to have a shortage of capacity if there is not 30 seats available (refer to Table 4.10.C.B). As also discussed above, it is important to note that the proposed Modified Project (which is a commercial use) only results in a higher number of projected students than the Approved Project (which is a residential use) because the generation factors have changed since certification of the 2006 EIR. Alternatively, if 2010 generation rates are used to calculate the projected students from the Approved Project, the proposed Modified Project would generate 78 fewer students than the Approved Project. Nonetheless, using either methodology, all potential cumulative impacts related to school services and facilities with implementation of the Approved Project and the proposed Modified Project would be less than significant because the Approved Project, the proposed Modified Project, and any related projects would be subject to mandatory Compliance Measure 4.10.C.A, which requires the payment of fees for the purpose of funding the construction or reconstruction of school facilities. As such, ~~and~~ the proposed Modified Project would not involve new significant cumulative impacts to school services and facilities. Accordingly, as compared to the Approved Project, the proposed Modified Project would not involve new significant cumulative environmental effects or a substantial increase in the severity of previously identified cumulative significant effects related to school services and facilities.

Draft Subsequent EIR – 4.11.A Water Supply

Page 4.11.A-17, second paragraph, third sentence, is revised as follows:

> In addition, LADWP is currently installing a new regulator pump station for Century City, which is ~~was~~ anticipated to be completed in late 2014 ~~2012/2013~~.

Page 4.11.A-20, last paragraph, third sentence, is revised as follows:

> In addition, LADWP is currently installing a new regulator pump station for Century City, which is ~~was~~ anticipated to be completed in late 2014 ~~2012/2013~~.

Page 4.11.A-15, first full paragraph, is revised as follows:

> Table 4.11.A.A shows the difference between the projected water demand for the Approved Project and the projected water demand for the proposed Modified Project. As stated above, the Approved Project was projected to result in a net increase of 111,461 gallons per day. As shown in Table 4.11.A.A, the proposed Modified Project (less existing demand and water conservation

features) is projected to demand 131,216 gallons per day. The difference would be 19,755 gallons per day, which is an increase of approximately 18 ~~13~~ percent.

Page 4.11.A-16, first and second full paragraphs, are revised as follows:

As shown in Table 4.11.A.B, the City's anticipated water demand is projected to be 614,794 acre-feet per year in 2015 and 710,760 acre-feet by 2035, which is an increase of 69,023 acre-feet (13 ~~11~~ percent) and 164,989 acre-feet (30 percent) from 2010 consumption, respectively.

The increase of 124 acre-feet in water demand generated by the Approved Project would constitute approximately 0.02 percent of the City's total water demand in 2015 and 0.02 percent of the City's total water demand in 2035. In comparison, the increase of 147 acre-feet in water demand generated by the proposed Modified Project would constitute approximately 0.02 percent of the City's total water demand in 2015 and approximately 0.02 percent of the City's total water demand in 2035. The difference between the water demand for the Approved Project and the Proposed Modified Project (23 acre-feet) would constitute approximately 0.004 ~~0.003~~ percent of the City's total water demand in 2015 and approximately 0.003 ~~0.002~~ percent of the City's total water demand in 2035.

Page 4.11.A-19, third full paragraph, is revised as follows:

As discussed above, LADWP's 2010 Urban Water Management Plan provides water demand projections in 5-year increments through 2035, which are based on demographic data from the Southern California Association of Governments 2008 Regional Transportation Plan, as well as billing data for each major customer class, weather, and conservation. Table 4.11.A.B provides the projected water demand for the City of Los Angeles through 2035. As shown in Table 4.11.A.B, the City's anticipated water demand is projected to be 614,794 acre-feet per year in 2015 and 710,760 acre-feet by 2035, which is an increase of 69,023 acre-feet (13 ~~11~~ percent) and 164,989 acre-feet (30 percent) from 2010 consumption, respectively.

Page 4.11.A-18, first paragraph, is revised as follows:

Lastly, as discussed above, LADWP has an existing Capital Improvement Program that assesses and replaces aging or insufficient infrastructure on an as-needed basis in order to ensure system integrity. A portion of the Capital Improvement Program budget is dedicated to infrastructure reliability projects. The Infrastructure Reliability budget is comprised mostly of work on distribution mains, major system connections, and reservoir improvements. The Approved Project and proposed Modified Project are only responsible for providing necessary water infrastructure on the Project site and for ensuring that water supply is available to serve the Project site. The City is responsible for maintaining and updating any aging infrastructure, the condition of off-site infrastructure and any improvements to that infrastructure are beyond the scope of the Approved Project and proposed Modified Project. As discussed previously, LADWP has confirmed that the increase in water demand attributable to the proposed Modified Project would fall within the available and projected water supplies of the 2010 Urban Water Management Plan, and water is available within the municipal system to serve the proposed Modified Project. The 2010 Urban Water Management Plan and LADWP's Water Supply Action Plan and Capital Improvement Program, all discussed above, are designed to ensure the reliability of water supply infrastructure in the City. As such, neither project would cause an impact to the aging or potential deterioration of off-site infrastructure. Therefore, impacts associated with operation of both the Approved Project and the proposed Modified Project

are considered less than significant, and no mitigation is required. Accordingly, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water distribution capacity.

Page 4.11.A-21, second full paragraph, is revised as follows:

Lastly, as discussed in Section 4.11.A.1, LADWP has an existing Capital Improvement Program that assesses and replaces aging or insufficient infrastructure on an as-needed basis in order to ensure system integrity. A portion of the Capital Improvement Program budget is dedicated to infrastructure reliability projects. The Infrastructure Reliability budget is comprised mostly of work on distribution mains, major system connections, and reservoir improvements. The proposed Modified Project is only responsible for providing necessary water infrastructure on the Project site and for ensuring that water supply is available to serve the Project site. The City is responsible for maintaining and updating any aging infrastructure, the condition of off-site infrastructure and any improvements to that infrastructure are beyond the scope of the proposed Modified Project. As discussed previously, LADWP has confirmed that the increase in water demand attributable to the proposed Modified Project would fall within the available and projected water supplies of the 2010 Urban Water Management Plan, and water is available within the municipal system to serve the proposed Modified Project. The 2010 Urban Water Management Plan and LADWP's Water Supply Action Plan and Capital Improvement Program, all discussed above, are designed to ensure the reliability of water supply infrastructure in the City. As such, the proposed Modified Project would not cause an impact to the aging or potential deterioration of off-site infrastructure. Therefore, impacts associated with operation of the proposed Modified Project are considered less than significant, and no mitigation is required.

Page 4.11.B-15, the following text is added before the first full paragraph:

As discussed above, as part of the Collection System Settlement Agreement, the City is required to enhance, repair, and update the sewer system and sets specific timelines for the City to complete the upgrades. The seventh progress report, published in August 2011, indicated that the City is currently in full compliance with the Collection System Settlement Agreement and that the number of sanitary sewer overflows reached an all-time low in 2010/2011 and is among the lowest in California and the United States. The Approved Project and proposed Modified Project are only responsible for providing necessary sewer infrastructure on the Project site and for ensuring that sewer capacity is available to serve the Project site. Because the City is responsible for maintaining and updating any aging infrastructure, the condition of off-site infrastructure and any improvements to that infrastructure are beyond the scope of the Approved Project and proposed Modified Project. In addition, as stated above, the City Bureau of Sanitation concluded that it appears that the existing sanitary sewer lines have sufficient capacity to transport the wastewater generated by the proposed Modified Project to the Hyperion Treatment Plant. In the event that during the permitting and development process, local wastewater lines are found to contain insufficient capacity, be substandard, or in deteriorated condition, the Applicant would be required by City regulations to make necessary improvements to achieve adequate service in consultation with the Los Angeles Department of Public Works Bureau of Sanitation. As such, neither the Approved Project or proposed Modified Project would cause an impact to the aging or potential deterioration of off-site infrastructure.

Page 4.11.B-17, the following text is added before the first full paragraph:

As discussed above, as part of the Collection System Settlement Agreement, the City is required to enhance, repair, and update the sewer system and sets specific timelines for the City to complete the upgrades. The seventh progress report, published in August 2011, indicated that the City is currently in full compliance with the Collection System Settlement Agreement and that the number of sanitary sewer overflows reached an all-time low in 2010/2011 and is among the lowest in California and the United States. The proposed Modified Project is only responsible for providing necessary sewer infrastructure on the Project site and for ensuring that sewer capacity is available to serve the Project site. Because the City is responsible for maintaining and updating any aging infrastructure, the condition of off-site infrastructure and any improvements to that infrastructure are beyond the scope of the proposed Modified Project. In addition, as stated above, the City Bureau of Sanitation concluded that it appears that the existing sanitary sewer lines have sufficient capacity to transport the wastewater generated by the proposed Modified Project to the Hyperion Treatment Plant. In the event that during the permitting and development process, local wastewater lines are found to contain insufficient capacity, be substandard, or in deteriorated condition, the Applicant would be required by City regulations to make necessary improvements to achieve adequate service in consultation with the Los Angeles Department of Public Works Bureau of Sanitation. As such, the proposed Modified Project would not cause an impact to the aging or potential deterioration of off-site infrastructure.

Draft Subsequent EIR – 4.12.B Natural Gas

Page 4.12.B-17, third full paragraph, is revised as follows:

Proposed Modified Project Compared to Existing Conditions Cumulative Impact Analysis. The related projects evaluated in this cumulative analysis comprise the planned or projected development identified in the related projects list provided in Section 4.0 of this Subsequent EIR. The cumulative study area for energy resources analysis pertaining to natural gas is Southern California Gas Company's service area, which is all of central and southern California. Therefore, all related projects identified in this Subsequent EIR are included in this cumulative discussion. Implementation of the proposed Modified Project in combination with the 98 related projects would increase the demand for natural gas. Table 4.12.B.D shows that the estimated natural gas consumption by the related projects is estimated to total approximately 482,524,712 ~~million~~ cubic feet per year. In combination with the proposed Modified Project, which would consume approximately 1,467,378 cubic feet per year, cumulative natural gas consumption by the related projects would be approximately 483,992,090 ~~million~~ cubic feet per year.

Draft Subsequent EIR – 6.0 General Impact Categories

Page 6-6, second paragraph, fifth sentence, is revised as follows:

In addition, the Los Angeles Department of Water and Power also indicated that installation of a new regulator pump station for Century City is ~~was~~ anticipated to be completed in late 2014 ~~2012/2013~~.

Page 6-8, last paragraph, fourth sentence, is revised as follows:

In addition, the Los Angeles Department of Water and Power also indicated that installation of a new regulator pump station for Century City is ~~was~~ anticipated to be completed in late 2014 ~~2012/2013~~.

Final Subsequent EIR – 1.0 Introduction and Summary

Mitigation Measure 4.2.2 (page 1-45) is revised as follows:

Mitigation Measure 4.2.2: This Mitigation Measure is applicable to all trip generation rates. The Applicant shall work with the Century City Transportation Management Organization (CCTMO) to develop a high-quality mobile (cell phone) application for the use of residents, employees, and visitors to the Study Area, and Century City in particular. The application shall be developed fully at the Applicant's sole expense, and shall be maintained at the Applicant's sole expense for a period of ten (10) years. This application shall:

- Alert drivers of congestion on key routes serving Century City
- Identify alternate routes that bypass congestion
- Identify real-time visitor parking availability within Century City
- Identify transit options for travel to and from Century City

The application ~~would~~ shall be promoted by the CCTMO and the Applicant and ~~would~~ shall help to relieve congestion, reduce vehicle miles travelled (VMT) through the identification of available parking, and promote transit usage by suggesting non-automotive methods of travel for a proposed route. The application ~~would~~ shall help reduce peak-hour vehicular trips throughout the Study Area, and particularly within Century City. The application shall not direct traffic through residential neighborhoods.

Final Subsequent EIR – Topical Response 7: Supplemental Analysis of Alternative 9

Page 4-220, first full paragraph, is revised as follows:

However, in order to provide an additional, conservative assessment of the proposed Modified Project's potential traffic and circulation impact, a supplemental analysis of the proposed Modified Project was conducted under year 2021 conditions without the projected traffic shifts from the Westside Subway Extension. (See Topical Response 6, Section 1.) In order to conservatively assess Alternative 9's potential traffic and circulation impact, this same analysis was undertaken for Alternative 9, below. As described in Topical Response 6, Section 1, Mitigation Measure 4.2.5.1 would provide an articulated bus on Metropolitan Transportation Authority (Metro) Rapid 704 on Santa Monica Boulevard to mitigate traffic impacts associated with the supplemental analysis for the proposed Modified Project. Mitigation Measure 4.2.5.1 would also be applied to Alternative 9 under the Empirical Rate, Economy Adjustment, and Published Rates analyses. Also, as described in

Chapter 3 of this Final Subsequent EIR, Mitigation Measure 4.2.4 would not be necessary to mitigate Alternative 9 impacts. Therefore, the Alternative 9 mitigation program would consist of Mitigation Measures 4.2.1, 4.2.2, 4.2.3, and 4.2.5.1 for the Empirical Rate and Economy Adjustment analyses, and Mitigation Measures 4.2.1, 4.2.2, 4.2.3, and 4.2.5.1~~, and 4.2.5.2~~ for the Published Rates analysis. Mitigation Measure 4.2.5.2 would also be included in the Alternative 9 mitigation program for the Published Rates; however, it would be amended to include a bus on Pico Boulevard in addition to the two buses on Olympic Boulevard and the bus on Santa Monica Boulevard that were included in the phased mitigation program for the proposed Modified Project. Mitigation Measure 4.2.5.2 shall require a new 40-foot bus for Santa Monica BBB Rapid 7 that would travel eastbound during the morning peak hour and westbound during the afternoon peak hour on Pico Boulevard. The requirement for the bus on Pico Boulevard shall be implemented if, after the six-month probationary period, the trip monitoring resulted in rates above 392 afternoon peak hour trips.

Final Subsequent EIR – 3.0 Enhanced Retail Alternative (Alternative 9)

Page 3-3, the following text is added after the first full paragraph:

The proposed Modified Project would be consistent with the commercial core designation of this area of Century City, and would contribute to a mixed-use environment in a designated Regional Center. As a result, the Approved Project and the proposed Modified Project would not result in an impact with regard to the mixed-use environment.

The Approved Project was a residential land use that would not have caused an impediment to the enjoyment and operation of the existing commercial uses in the area. Furthermore, the Approved Project's residential use would not have impeded the continuation of existing commercial operations in the vicinity. Therefore, the Approved Project was determined to not create an incompatibility of use with the adjacent commercial uses. The proposed Modified Project is consistent with an urban lifestyle because it preserves the existing office community in Century City and maintains a pedestrian-oriented environment through its open spaces and landscaping. Accordingly, the proposed Modified Project would not create an incompatibility of use within adjacent commercial uses. As a result, the Approved Project and the proposed Modified Project would not result in an impact with regard to juxtaposition of adjacent land uses.

The intensity of the Approved Project was found to be consistent with the land use intensity of adjacent and nearby land uses. The proposed Modified Project's scale (including activity level, height of buildings, and dominance of site) and use would be similar to the other existing offices uses in the vicinity of the Project site. As a result, the Approved Project and the proposed Modified Project would not result in an impact with regard to the intensity of development.

The Approved Project was found to be consistent with the pedestrian orientation of Century City because it would have included upgraded landscaping along the public streets and sidewalks, (including shade trees, flower gardens, water features, lighting features, landscaped setbacks, and seating areas for pedestrians), and public open space at the corner of Avenue of the Stars and Constellation Boulevard. The proposed Modified Project is also consistent with the pedestrian orientation of Century City because it maintains pedestrian-oriented environments through its open spaces and landscaping. As a result, the Approved Project and the proposed Modified Project would not result in an impact with regard to pedestrian orientation.

In summary, both the Approved Project and the proposed Modified Project would result in a less than significant land use compatibility impact with regard to juxtaposition of land uses and the mixed use environment, intensity of development, commercial core designation, and the pedestrian orientation of Century City. Accordingly, as compared to the Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to land use compatibility.

Page 3-3, the following text is added after the third full paragraph:

Similar to the proposed Modified Project, Alternative 9 would be consistent with the commercial core designation and land use intensity of Century City, would contribute to a mixed-use environment, would preserve the existing office community in Century City, would maintain a pedestrian-oriented environment, and would be similar in scale to other office uses in the vicinity of the Project site. As a result, Alternative 9 would result in a less than significant land use compatibility impact with regard to juxtaposition of land uses and the mixed use environment, intensity of development, commercial core designation, and the pedestrian orientation of Century City.

Page 3-5, the following text is added before the first paragraph:

The proposed Modified Project would be consistent with the commercial core designation of this area of Century City, and would contribute to a mixed-use environment in a designated Regional Center. As a result, the proposed Modified Project would not result in an impact with regard to the mixed-use environment.

The proposed Modified Project would be consistent with an urban lifestyle because it would preserve the existing office community in Century City and maintain a pedestrian-oriented environment through its open spaces and landscaping. Accordingly, the proposed Modified Project would not create an incompatibility of use within adjacent commercial uses. As a result, the proposed Modified Project would not result in an impact with regard to juxtaposition of adjacent land uses.

The proposed Modified Project's scale (including activity level, height of buildings, and dominance of site) and use would be similar to the other existing offices uses in the vicinity of the Project site. As a result, the proposed Modified Project would not result in an impact with regard to the intensity of development.

The proposed Modified Project is also consistent with the pedestrian orientation of Century City because it maintains pedestrian-oriented environments through its open spaces and landscaping. As a result, the proposed Modified Project would not result in an impact with regard to pedestrian orientation.

In summary, the proposed Modified Project would result in a less than significant land use compatibility impact with regard to juxtaposition of land uses and the mixed use environment, intensity of development, commercial core designation, and the pedestrian orientation of Century City.

Page 3-5, the following text is added after the second paragraph

Similar to the proposed Modified Project, Alternative 9 would be consistent with the commercial core designation and land use intensity of Century City, would contribute to a mixed-use environment, would preserve the existing office community in Century City, would maintain a pedestrian-oriented environment, and would be similar in scale to other office uses in the vicinity of the Project site. As a result, Alternative 9 would result in a less than significant land use compatibility impact with regard to juxtaposition of land uses and the mixed use environment, intensity of development, commercial core designation, and the pedestrian orientation of Century City.

Page 3-7, the first full paragraph, is revised as follows:

The analysis and findings presented in this section are based on the information provided in the Transportation Study for the proposed Modified Project prepared by Gibson Transportation Consulting, Inc. (September 2013). The Los Angeles Department of Transportation (LADOT) and the Los Angeles Department of City Planning reviewed and approved the Alternative 9 traffic data and analysis. Specifically, LADOT confirmed that the traffic analysis, alternative trip generation analysis, and mitigation program proposed for Alternative 9 are consistent with what LADOT previously approved for the proposed Modified Project. Refer to Appendix P of the Final EIR for Alternative 9 Traffic Data. Refer to Appendix AP for the LADOT's Assessment Letter approving the traffic analysis for Alternative 9.

Page 3-11, last full paragraph, is revised as follows:

Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. As shown on Table 3.1.A, no intersections would be significantly impacted by Alternative 9 under the Economy Adjustment Rate following the implementation of Mitigation Measures 4.2.1, 4.2.2 and 4.2.3. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis (but not under the Empirical or Economy Adjustment Rates analysis), this bus service has been added to the phased mitigation program provided in Mitigation Measures 4.2.5.1 and 4.2.5.2 and is discussed under the Published Rates analysis below.

Page 3-20, last full paragraph, and Mitigation Measure 4.2.5 (pages 3-20 through 3-22), are revised as follows:

Mitigation measures for the proposed Modified Project traffic impacts (Mitigation Measures 4.2.1 through 4.2.5) have been identified and are discussed in Section 4.2.13 of the Draft Subsequent EIR. Mitigation Measures 4.2.1, 4.2.2, and 4.2.3 would apply to Alternative 9 as they would to the proposed Modified Project. However, because Alternative 9 would generate fewer daily and peak-hour trips and would add fewer trips to the Study Area, the mitigation program proposed for the proposed Modified Project would be modified for Alternative 9 traffic impacts. Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis, the additional bus service previously required under Mitigation Measure 4.2.4 for the proposed Modified Project would

be added to the phased mitigation program under Mitigation Measure 4.2.5 for Alternative 9. Provided below are the revisions to Mitigation Measure 4.2.5 (which becomes Mitigation Measures 4.2.5.1 and 4.2.5.2) as it would apply to Alternative 9:

Mitigation Measure 4.2.5.1: Mitigation Measure 4.2.5.1 is applicable to the proposed Enhanced Retail Alternative under any trip generation scenario (Empirical Rate, Economy Adjustment, Published Rates) if the Westside Subway Extension is not operating in Century City in year 2021 or by the date that the Certificate of Occupancy is issued for the Enhanced Retail Alternative, whichever is earlier. In order to provide additional transportation capacity and mitigate traffic impacts, the Applicant shall pay to provide additional peak hour bus service for the Metropolitan Transportation Authority (Metro) Rapid Line 704 on Santa Monica Boulevard. A new articulated bus for Santa Monica Metro Rapid Line 704 shall be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. The Applicant shall pay $750,000 toward the procurement of a new 40-foot bus and an average of $110,000 per year for 10 years ($1,100,000 total) toward the operating and maintenance costs for morning and afternoon peak hour service. Farebox revenues and State and Federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period. This bus shall no longer be required to be provided upon completion of the Westside Subway Extension to Century City.

Mitigation Measure 4.2.5.2: The Enhanced Retail Alternative shall be subject to on-going monitoring to ensure that the actual automobile trip generation is at or below the projected afternoon peak hour estimate for the Enhanced Retail Alternative with Economy Adjustment (392 peak hour trips).

LADOT has established this on-going monitoring program to determine if additional transit mitigation shall be required in the event that the Enhanced Retail Alternative exceeds 392 afternoon peak hour automobile trips. For this purpose, LADOT has established four afternoon peak hour automobile trip generation thresholds: (i) 392 trips; (ii) 451 trips; (iii) 510 trips; and (iv) 588 trips (together, the "Trip Generation Thresholds"), the exceedance of which shall require the Applicant to implement additional transit mitigation measures as provided below.

Monitoring of automobile trips to and from the Project site shall occur on a real-time basis using video cameras mounted above the Enhanced Retail Alternative's driveways. The cameras shall operate 24 hours a day, 7 days a week. The cameras and the count system shall be connected to the LADOT Traffic Management Center or another appropriate facility of LADOT's selection.

The Enhanced Retail Alternative's trip generation level shall be the average of the Monday through Friday afternoon peak hour automobile trips in and out of the Enhanced Retail Alternative driveways (excluding any federal, State, or local holidays). The Enhanced Retail Alternative's building operator shall provide weekly reports of the average trip generation level to LADOT. LADOT shall review the weekly reports and compare the Enhanced Retail Alternative's weekly average trip generation level to the Trip Generation Thresholds.

Should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed a number that is 10 percent below any of the four Trip Generation Thresholds for four consecutive weeks, the building operator shall in good faith implement additional or modified trip reduction measures with the goal of helping to ensure that the Enhanced Retail Alternative's trips do not exceed the applicable Trip Generation Threshold. Further, should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed any of the four Trip Generation Thresholds for four consecutive weeks, the Enhanced Retail Alternative shall undergo a three-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Such measures may include, but are not limited to, modifications to the Transportation Demand Management Program (see Project Design Feature TRA-3). Weekly average afternoon peak hour trip generation measurements during the final four weeks of the three-month probationary period shall determine the effectiveness of the additional trip reduction measures. Pursuant to this process, if the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level in the final four weeks of the three-month probationary period exceeds any of the four Trip Generation Thresholds, the phase mitigation program described below would apply based on the threshold exceeded.

The phased mitigation program requires the implementation of the following transit measures at the time that each of the specified Trip Generation Thresholds is exceeded for the first time following the three month probationary period:

- At 392 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid 7 shall be added on Pico Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 451 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Line 5 shall be added on Olympic Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.

- At 510 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Line 5 shall be added on Olympic Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.
- At 588 trips, a 40-foot bus for Metro Line 4 shall be added on Santa Monica Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.

If required by the phased mitigation program, the Applicant shall be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues from each bus, as calculated by the appropriate transit agency (e.g., Metro or Santa Monica BBB) and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

In addition, if the articulated bus on Santa Monica Boulevard as provided in Mitigation Measure 4.2.5.1 has not been provided because the Westside Subway Extension has been completed to Century City, this bus shall be provided at 404 afternoon peak hour trips following the three month probationary period described above. The Applicant shall pay $750,000 for procurement and an average of $110,000 per year for 10 years for an articulated bus on Metro Rapid Line 704 traveling eastbound during the morning peak hour and westbound during the afternoon peak hour. Farebox revenues from this bus, as calculated by the appropriate transit agency, and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

The monitoring program described in this mitigation measure shall continue for a minimum of five years after full occupancy of the Enhanced Retail Alternative (defined as having leased 88% of the building's gross leasable area). If during that period the Enhanced Retail Alternative's trip generation level exceeds any of the Trip Generation Thresholds following the three month probationary period described above, the monitoring program shall continue for an additional five years following the exceedance. The monitoring program shall cease when five years of monitoring demonstrate a stable trip generation level (defined as not exceeding the next highest of the Trip Generation Thresholds).

~~**Mitigation Measure 4.2.5:** Alternative 9 shall be subject to on-going monitoring to ensure that the actual trip generation is at or below the level of traffic that~~

~~could significantly impact an intersection prior to mitigation (392 afternoon peak hour trips). Monitoring of trips to and from the Project site shall occur on a real-time basis using video cameras mounted above Alternative 9's driveways. The cameras shall operate 24 hours a day, 7 days a week. Should the actual trip rates exceed 392 afternoon peak hour trips for three consecutive months, Alternative 9 shall undergo a six-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Pursuant to this process, if after the six-month probationary period the trip monitoring resulted in rates above 392 afternoon peak hour trips, the following would apply.~~

~~In order to provide additional transportation capacity and to mitigate the Alternative 9 with Published Rates traffic impacts, the Applicant shall pay to provide additional peak hour bus service on Pico Boulevard, Santa Monica Boulevard, and Olympic Boulevard, if required, based on the phased mitigation program described below. If required by the phased mitigation program, the following buses would be added to these corridors:~~

- ~~A 40-foot bus for the Santa Monica BBB Rapid 7 on Pico Boulevard~~
- ~~An articulated bus for Metro Rapid Line 704 on Santa Monica Boulevard~~
- ~~Two 40-foot buses for the Santa Monica BBB Line 5 on Olympic Boulevard~~
- ~~A 40-foot bus for Metro Line 4 on Santa Monica Boulevard~~

~~On Pico Boulevard, a new 40-foot bus for Santa Monica BBB Rapid 7 would be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. On Olympic Boulevard, one 40-foot bus would be added in each direction on the Santa Monica BBB Line 5 during the morning and afternoon peak hours. On Santa Monica Boulevard a new 40-foot bus for Metro Line 4 would be added that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.~~

~~These measures would be implemented according to the following schedule based on afternoon peak hour trips over the limit of the afternoon peak hour (i.e., 392 afternoon peak hour trips), following the six-month probationary period described above:~~

- ~~At 392 trips, the 40-foot bus on Pico Boulevard~~
- ~~At 404 trips, the articulated bus on Santa Monica Boulevard~~
- ~~At 451 trips, the first 40-foot bus on Olympic Boulevard~~
- ~~At 510 trips, the second 40-foot bus on Olympic Boulevard~~

~~• At 588 trips, the 40-foot bus on Santa Monica Boulevard~~

~~If required by the phased mitigation program, the Applicant would be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues and state or federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period.~~

Page 3-25, second full paragraph, is revised as follows:

Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. As shown on Table 3.1.B, no intersections would be significantly impacted by Alternative 9 under the Economy Adjustment Rate following the implementation of Mitigation Measures 4.2.1, 4.2.2 and 4.2.3. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis (but not under the Empirical or Economy Adjustment rates), this bus service has been added to the phased mitigation program provided in Mitigation Measures 4.2.5.1 and 4.2.5.2 and is discussed under the Published Rates analysis below.

Page 3-36 last full paragraph, and Mitigation Measure 4.2.5 (pages 3-36 through 3-38), are revised as follows:

Mitigation measures for the proposed Modified Project traffic impacts (Mitigation Measures 4.2.1 through 4.2.5) have been identified and are discussed in Section 4.2.13 of the Draft Subsequent EIR. Mitigation Measures 4.2.1, 4.2.2, and 4.2.3 would apply to Alternative 9 as they would to the proposed Modified Project. However, because Alternative 9 would generate fewer daily and peak-hour trips and would add fewer trips to the Study Area, the mitigation program proposed for the proposed Modified Project would be modified for Alternative 9 traffic impacts. Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis, the additional bus service previously required under Mitigation Measure 4.2.4 for the proposed Modified Project would be added to the phased mitigation program under Mitigation Measure 4.2.5 for Alternative 9. Provided below are the revisions to Mitigation Measure 4.2.5 (which becomes Mitigation Measures 4.2.5.1 and 4.2.5.2) as it would apply to Alternative 9:

Mitigation Measure 4.2.5.1: Mitigation Measure 4.2.5.1 is applicable to the proposed Enhanced Retail Alternative under any trip generation scenario (Empirical Rate, Economy Adjustment, Published Rates) if the Westside Subway Extension is not operating in Century City in year 2021 or by the date that the Certificate of Occupancy is issued for the Enhanced Retail Alternative, whichever is earlier. In order to provide additional transportation capacity and mitigate traffic impacts, the Applicant shall pay to provide additional peak hour bus service for

the Metropolitan Transportation Authority (Metro) Rapid Line 704 on Santa Monica Boulevard. A new articulated bus for Santa Monica Metro Rapid Line 704 shall be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. The Applicant shall pay $750,000 toward the procurement of a new 40-foot bus and an average of $110,000 per year for 10 years ($1,100,000 total) toward the operating and maintenance costs for morning and afternoon peak hour service. Farebox revenues and State and federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period. This bus shall no longer be required to be provided upon completion of the Westside Subway Extension to Century City.

Mitigation Measure 4.2.5.2: The Enhanced Retail Alternative shall be subject to on-going monitoring to ensure that the actual automobile trip generation is at or below the projected afternoon peak hour estimate for the Enhanced Retail Alternative with Economy Adjustment (392 peak hour trips).

LADOT has established this on-going monitoring program to determine if additional transit mitigation shall be required in the event that the Enhanced Retail Alternative exceeds 392 afternoon peak hour automobile trips. For this purpose, LADOT has established four afternoon peak hour automobile trip generation thresholds: (i) 392 trips; (ii) 451 trips; (iii) 510 trips; and (iv) 588 trips (together, the "Trip Generation Thresholds"), the exceedance of which shall require the Applicant to implement additional transit mitigation measures as provided below.

Monitoring of automobile trips to and from the Project site shall occur on a real-time basis using video cameras mounted above the Enhanced Retail Alternative's driveways. The cameras shall operate 24 hours a day, 7 days a week. The cameras and the count system shall be connected to the LADOT Traffic Management Center or another appropriate facility of LADOT's selection.

The Enhanced Retail Alternative's trip generation level shall be the average of the Monday through Friday afternoon peak hour automobile trips in and out of the Enhanced Retail Alternative driveways (excluding any federal, State, or local holidays). The Enhanced Retail Alternative's building operator shall provide weekly reports of the average trip generation level to LADOT. LADOT shall review the weekly reports and compare the Enhanced Retail Alternative's weekly average trip generation level to the Trip Generation Thresholds.

Should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed a number that is 10 percent

below any of the four Trip Generation Thresholds for four consecutive weeks, the building operator shall in good faith implement additional or modified trip reduction measures with the goal of helping to ensure that the Enhanced Retail Alternative's trips do not exceed the applicable Trip Generation Threshold. Further, should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed any of the four Trip Generation Thresholds for four consecutive weeks, the Enhanced Retail Alternative shall undergo a three-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Such measures may include, but are not limited to, modifications to the Transportation Demand Management Program (see Project Design Feature TRA-3). Weekly average afternoon peak hour trip generation measurements during the final four weeks of the three-month probationary period shall determine the effectiveness of the additional trip reduction measures. Pursuant to this process, if the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level in the final four weeks of the three-month probationary period exceeds any of the four Trip Generation Thresholds, the phase mitigation program described below would apply based on the threshold exceeded.

The phased mitigation program requires the implementation of the following transit measures at the time that each of the specified Trip Generation Thresholds is exceeded for the first time following the three month probationary period:

- At 392 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid 7 shall be added on Pico Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 451 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Line 5 shall be added on Olympic Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 510 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Line 5 shall be added on Olympic Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.
- At 588 trips, a 40-foot bus for Metro Line 4 shall be added on Santa Monica Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.

If required by the phased mitigation program, the Applicant shall be responsible for the cost of procurement of the buses as well as a

portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues from each bus, as calculated by the appropriate transit agency (e.g., Metro or Santa Monica BBB) and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

In addition, if the articulated bus on Santa Monica Boulevard as provided in Mitigation Measure 4.2.5.1 has not been provided because the Westside Subway Extension has been completed to Century City, this bus shall be provided at 404 afternoon peak hour trips following the three month probationary period described above. The Applicant shall pay $750,000 for procurement and an average of $110,000 per year for 10 years for an articulated bus on Metro Rapid Line 704 traveling eastbound during the morning peak hour and westbound during the afternoon peak hour. Farebox revenues from this bus, as calculated by the appropriate transit agency, and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

The monitoring program described in this mitigation measure shall continue for a minimum of five years after full occupancy of the Enhanced Retail Alternative (defined as having leased 88% of the building's gross leasable area). If during that period the Enhanced Retail Alternative's trip generation level exceeds any of the Trip Generation Thresholds following the three month probationary period described above, the monitoring program shall continue for an additional five years following the exceedance. The monitoring program shall cease when five years of monitoring demonstrate a stable trip generation level (defined as not exceeding the next highest of the Trip Generation Thresholds).

~~**Mitigation Measure 4.2.5:**~~ ~~Alternative 9 shall be subject to on-going monitoring to ensure that the actual trip generation is at or below the level of traffic that could significantly impact an intersection prior to mitigation (392 afternoon peak hour trips). Monitoring of trips to and from the Project site shall occur on a real-time basis using video cameras mounted above Alternative 9's driveways. The cameras shall operate 24 hours a day, 7 days a week. Should the actual trip rates exceed 392 afternoon peak hour trips for three consecutive months, Alternative 9 shall undergo a six-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Pursuant to this process, if after the six-month probationary period the trip monitoring resulted in rates above 392 afternoon peak hour trips, the following would apply.~~

~~In order to provide additional transportation capacity and to mitigate the Alternative 9 with Published Rates traffic impacts, the Applicant shall pay to provide additional peak-hour bus service on Pico Boulevard, Santa Monica Boulevard, and Olympic Boulevard, if required, based on the phased mitigation program described below. If required by the phased mitigation program, the following buses would be added to these corridors:~~

- ~~A 40-foot bus for the Santa Monica BBB Rapid 7 on Pico Boulevard~~
- ~~An articulated bus for Metro Rapid Line 704 on Santa Monica Boulevard~~
- ~~Two 40-foot buses for the Santa Monica BBB Line 5 on Olympic Boulevard~~
- ~~A 40-foot bus for Metro Line 4 on Santa Monica Boulevard~~

~~On Pico Boulevard, a new 40-foot bus for Santa Monica BBB Rapid 7 would be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. On Olympic Boulevard, one 40-foot bus would be added in each direction on the Santa Monica BBB Line 5 during the morning and afternoon peak hours. On Santa Monica Boulevard a new 40-foot bus for Metro Line 4 would be added that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.~~

~~These measures would be implemented according to the following schedule based on afternoon peak hour trips over the limit of the afternoon peak hour (i.e., 392 afternoon peak hour trips), following the six-month probationary period described above:~~

- ~~At 392 trips, the 40-foot bus on Pico Boulevard~~
- ~~At 404 trips, the articulated bus on Santa Monica Boulevard~~
- ~~At 451 trips, the first 40-foot bus on Olympic Boulevard~~
- ~~At 510 trips, the second 40-foot bus on Olympic Boulevard~~
- ~~At 588 trips, the 40-foot bus on Santa Monica Boulevard~~

~~If required by the phased mitigation program, the Applicant would be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues and state or federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period.~~

Page 3-41, second full paragraph, is revised as follows:

Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. As shown on Table 3.1.C, no intersections would be significantly impacted by Alternative 9 under the Economy Adjustment Rate following the implementation of Mitigation Measures 4.2.1, 4.2.2 and 4.2.3. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis (but not under the Empirical or Economy Adjustment rates), this bus service has been added to the phased mitigation program provided in Mitigation Measures 4.2.5.1 and 4.2.5.2 and is discussed under the Published Rates analysis below.

Page 3-52, last full paragraph, and Mitigation Measure 4.2.5 (pages 3-52 through 3-54), are revised as follows:

Mitigation measures for the proposed Modified Project traffic impacts (Mitigation Measures 4.2.1 through 4.2.5) have been identified and are discussed in Section 4.2.13 of the Draft Subsequent EIR. Mitigation Measures 4.2.1, 4.2.2, and 4.2.3 would apply to Alternative 9 as they would to the proposed Modified Project. However, because Alternative 9 would generate fewer daily and peak-hour trips and would add fewer trips to the Study Area, the mitigation program proposed for the proposed Modified Project would be modified for Alternative 9 traffic impacts. Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis, the additional bus service previously required under Mitigation Measure 4.2.4 for the proposed Modified Project would be added to the phased mitigation program under Mitigation Measure 4.2.5 for Alternative 9. Provided below are the revisions to Mitigation Measure 4.2.5 (which becomes Mitigation Measures 4.2.5.1 and 4.2.5.2) as it would apply to Alternative 9:

Mitigation Measure 4.2.5.1: Mitigation Measure 4.2.5.1 is applicable to the proposed Enhanced Retail Alternative under any trip generation scenario (Empirical Rate, Economy Adjustment, Published Rates) if the Westside Subway Extension is not operating in Century City in year 2021 or by the date that the Certificate of Occupancy is issued for the Enhanced Retail Alternative, whichever is earlier. In order to provide additional transportation capacity and mitigate traffic impacts, the Applicant shall pay to provide additional peak hour bus service for the Metropolitan Transportation Authority (Metro) Rapid Line 704 on Santa Monica Boulevard. A new articulated bus for Santa Monica Metro Rapid Line 704 shall be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. The Applicant shall pay $750,000 toward the procurement of a new 40-foot bus and an average of $110,000 per year for 10 years ($1,100,000 total) toward the operating and maintenance costs for morning and afternoon peak hour service. Farebox revenues and State and Federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period. This bus shall no

longer be required to be provided upon completion of the Westside Subway Extension to Century City.

Mitigation Measure 4.2.5.2: The Enhanced Retail Alternative shall be subject to on-going monitoring to ensure that the actual automobile trip generation is at or below the projected afternoon peak hour estimate for the Enhanced Retail Alternative with Economy Adjustment (392 peak hour trips).

LADOT has established this on-going monitoring program to determine if additional transit mitigation shall be required in the event that the Enhanced Retail Alternative exceeds 392 afternoon peak hour automobile trips. For this purpose, LADOT has established four afternoon peak hour automobile trip generation thresholds: (i) 392 trips; (ii) 451 trips; (iii) 510 trips; and (iv) 588 trips (together, the "Trip Generation Thresholds"), the exceedance of which shall require the Applicant to implement additional transit mitigation measures as provided below.

Monitoring of automobile trips to and from the Project site shall occur on a real-time basis using video cameras mounted above the Enhanced Retail Alternative's driveways. The cameras shall operate 24 hours a day, 7 days a week. The cameras and the count system shall be connected to the LADOT Traffic Management Center or another appropriate facility of LADOT's selection.

The Enhanced Retail Alternative's trip generation level shall be the average of the Monday through Friday afternoon peak hour automobile trips in and out of the Enhanced Retail Alternative driveways (excluding any federal, State, or local holidays). The Enhanced Retail Alternative's building operator shall provide weekly reports of the average trip generation level to LADOT. LADOT shall review the weekly reports and compare the Enhanced Retail Alternative's weekly average trip generation level to the Trip Generation Thresholds.

Should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed a number that is 10 percent below any of the four Trip Generation Thresholds for four consecutive weeks, the building operator shall in good faith implement additional or modified trip reduction measures with the goal of helping to ensure that the Enhanced Retail Alternative's trips do not exceed the applicable Trip Generation Threshold. Further, should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed any of the four Trip Generation Thresholds for four consecutive weeks, the Enhanced Retail Alternative shall undergo a three-month probationary period during which time the building operator shall be required to

implement further trip reduction measures. Such measures may include, but are not limited to, modifications to the Transportation Demand Management Program (see Project Design Feature TRA-3). Weekly average afternoon peak hour trip generation measurements during the final four weeks of the three-month probationary period shall determine the effectiveness of the additional trip reduction measures. Pursuant to this process, if the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level in the final four weeks of the three-month probationary period exceeds any of the four Trip Generation Thresholds, the phase mitigation program described below would apply based on the threshold exceeded.

The phased mitigation program requires the implementation of the following transit measures at the time that each of the specified Trip Generation Thresholds is exceeded for the first time following the three month probationary period:

- At 392 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid 7 shall be added on Pico Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 451 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Line 5 shall be added on Olympic Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 510 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Line 5 shall be added on Olympic Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.
- At 588 trips, a 40-foot bus for Metro Line 4 shall be added on Santa Monica Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.

If required by the phased mitigation program, the Applicant shall be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues from each bus, as calculated by the appropriate transit agency (e.g., Metro or Santa Monica BBB) and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

In addition, if the articulated bus on Santa Monica Boulevard as provided in Mitigation Measure 4.2.5.1 has not been provided

because the Westside Subway Extension has been completed to Century City, this bus shall be provided at 404 afternoon peak hour trips following the three month probationary period described above. The Applicant shall pay $750,000 for procurement and an average of $110,000 per year for 10 years for an articulated bus on Metro Rapid Line 704 traveling eastbound during the morning peak hour and westbound during the afternoon peak hour. Farebox revenues from this bus, as calculated by the appropriate transit agency, and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

The monitoring program described in this mitigation measure shall continue for a minimum of five years after full occupancy of the Enhanced Retail Alternative (defined as having leased 88% of the building's gross leasable area). If during that period the Enhanced Retail Alternative's trip generation level exceeds any of the Trip Generation Thresholds following the three month probationary period described above, the monitoring program shall continue for an additional five years following the exceedance. The monitoring program shall cease when five years of monitoring demonstrate a stable trip generation level (defined as not exceeding the next highest of the Trip Generation Thresholds).

~~**Mitigation Measure 4.2.5:**~~ ~~Alternative 9 shall be subject to on-going monitoring to ensure that the actual trip generation is at or below the level of traffic that could significantly impact an intersection prior to mitigation (392 afternoon peak hour trips). Monitoring of trips to and from the Project site shall occur on a real-time basis using video cameras mounted above Alternative 9's driveways. The cameras shall operate 24 hours a day, 7 days a week. Should the actual trip rates exceed 392 afternoon peak hour trips for three consecutive months, Alternative 9 shall undergo a six-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Pursuant to this process, if after the six-month probationary period the trip monitoring resulted in rates above 392 afternoon peak hour trips, the following would apply.~~

~~In order to provide additional transportation capacity and to mitigate the Alternative 9 with Published Rates traffic impacts, the Applicant shall pay to provide additional peak hour bus service on Pico Boulevard, Santa Monica Boulevard, and Olympic Boulevard, if required, based on the phased mitigation program described below. If required by the phased mitigation program, the following buses would be added to these corridors:~~

- ~~A 40-foot bus for the Santa Monica BBB Rapid 7 on Pico Boulevard~~

- ~~An articulated bus for Metro Rapid Line 704 on Santa Monica Boulevard~~
- ~~Two 40-foot buses for the Santa Monica BBB Line 5 on Olympic Boulevard~~
- ~~A 40-foot bus for Metro Line 4 on Santa Monica Boulevard~~

~~On Pico Boulevard, a new 40-foot bus for Santa Monica BBB Rapid 7 would be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. On Olympic Boulevard, one 40-foot bus would be added in each direction on the Santa Monica BBB Line 5 during the morning and afternoon peak hours. On Santa Monica Boulevard a new 40-foot bus for Metro Line 4 would be added that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.~~

~~These measures would be implemented according to the following schedule based on afternoon peak hour trips over the limit of the afternoon peak hour (i.e., 392 afternoon peak hour trips), following the six-month probationary period described above:~~

- ~~At 392 trips, the 40-foot bus on Pico Boulevard~~
- ~~At 404 trips, the articulated bus on Santa Monica Boulevard~~
- ~~At 451 trips, the first 40-foot bus on Olympic Boulevard~~
- ~~At 510 trips, the second 40-foot bus on Olympic Boulevard~~
- ~~At 588 trips, the 40-foot bus on Santa Monica Boulevard~~

~~If required by the phased mitigation program, the Applicant would be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues and state or federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period.~~

Page 3-55, the following text is added before the first full paragraph:

Public Transit. The Approved Project Traffic Study estimated that the Approved Project would add approximately three new transit person trips in the morning peak hour and negative trips in the afternoon peak hour. Therefore, impacts of the Approved Project on transit trips were determined to be less than significant.

A total of approximately 1,464 on-site employees are expected to result from the proposed Modified Project. If 20 percent of employees use transit, the proposed Modified Project is expected to add 293 inbound and 293 outbound daily transit trips to the transit system. The proposed Modified Project will be designed to promote non-auto travel through design and orientation that is pedestrian-friendly and

facilitates transit use. The proposed components of the proposed Modified Project that would greatly encourage transit use by the patrons of the proposed Modified Project include the provision of a Mobility Hub on the Project site and implementation of a Transportation Demand Management program (Project Design Feature TRA-3).

Based on the anticipated number of transit trips generated by the proposed Modified Project, the anticipated demand from the proposed Modified Project would be more than satisfied by the overall existing capacity surplus. In total, the transit system has residual capacity of 3,285 riders during the morning peak period and a residual capacity of 4,133 riders during the afternoon peak period. (See Table 4.2.E in Section 4.2, Traffic and Circulation, in the Draft Subsequent EIR.) Therefore, the proposed Modified Project is not expected to significantly impact the regional transit system. Therefore, the proposed Modified Project would not have any significant new impacts beyond those of the Approved Project, nor would it increase the severity of any previously identified significant effects related to transit services.

Alternative 9 would provide long-term employment for approximately 1,467 employees. If 20 percent of employees use transit, the Alternative 9 is expected to add 293 inbound and 293 outbound daily transit trips to the transit system. Based on the anticipated number of transit trips generated by the Alternative 9, the anticipated demand from the Alternative 9 would be more than satisfied by the overall existing capacity surplus, and Alternative 9 is not expected to significantly impact the regional transit system. Therefore, impacts of Alternative 9 to transit services would be less than significant and similar to those of the proposed Modified Project as compared to the Approved Project.

Parking. Parking for residents of the Approved Project would have been provided at a ratio of two spaces per unit plus guest parking. Under the Los Angeles Municipal Code (LAMC), Section 12.21.A.4(a), each multiple unit dwelling with more than three rooms is required to provide two spaces per each dwelling unit. Under this criterion, the parking required for a 483-unit development would be 966 spaces. The Approved Project would have met code requirements by providing a total of 1,208 spaces within an on-site four-level subterranean structure.

In comparison, for office space, LAMC Section 12.21.A.4 requires the use of a parking ratio of one parking space for every 500 square feet of gross floor area. Retail establishments are required to provide at least four automobile parking spaces for each 1,000 sf of gross floor area and at least one automobile parking space is required for each five seats contained within any theatre. Under the Los Angeles Municipal Code, Section 12.21.A.4, a total of 1,509 spaces are required to serve the proposed Modified Project's proposed uses. The proposed Modified Project would comply with code requirements by providing a total of 1,579 spaces in an on-site parking structure. Accordingly, as compared to the Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to parking.

Alternative 9 would include the same amount of built square footage as the proposed Modified Project (731,250 square feet); however, under Alternative 9, 15,380 square feet of the Modified Project's proposed low-rise office space would be converted to ancillary retail space. Under the Los Angeles Municipal Code (LAMC), a total of 1,539 spaces are required to serve Alternative 9's

proposed uses. [1] Alternative 9 would comply with code requirements and would provide a total of up to 1,579 spaces in an on-site parking structure, which is the same number of spaces that would be provided by the proposed Modified Project. Therefore, parking impacts of Alternative 9 would be less than significant and similar to the proposed Modified Project compared to the Approved Project.

Page 3-55, the following text is added after the third full paragraph:

Pedestrian/Bicycle Safety.

Bicycle Access and Safety. There is an existing network of bicycle lanes in the vicinity of the Project site; however, no dedicated bicycle lanes currently exist on Constellation Boulevard or Avenue of the Stars. As part of the City of Los Angeles' 2010 Bicycle Plan (adopted March 1, 2011), a bicycle lane on Avenue of the Stars between Santa Monica Boulevard and Pico Boulevard is proposed as part of the Backbone Bikeway Network. As of the time of the publication of this report, the Avenue of the Stars bicycle lane has not been approved, and LADOT and the City are currently in the process of investigating potential alternative lanes at other locations in Century City. If the bicycle lane is implemented based on its proposed location, the alley bordering the northern edge of the Project site would intersect with this bike lane at Avenue of the Stars. Though potential bicycle traffic volume at this location cannot be accurately predicted, this analysis conservatively assumes that there could be access impacts with regard to bicycle activity as well as pedestrian activity due to the relatively high volume of bikes and pedestrians within Century City.

Project Design Feature TRA-8 would mitigate this potential impact. As noted in Project Design Feature TRA-8, the Applicant would install an audible buzzer system to indicate the approach of an exiting vehicle from the alley bordering the northern edge of the Project site at Avenue of the Stars and would install convex mirrors at exit points where visibility is hindered. With the implementation of this system, no significant impact would occur.

The location of a high-density residential use, like the Approved Project, in the proximity of existing routes would have encouraged bicycle activities. Further, the Approved Project would not have allowed on-street parking or other design features, such as line-of-sight obstructions, that would have increased conflicts between cyclists and vehicles.

Similarly, the proposed Modified Project is designed to encourage bicycle use. The proposed Modified Project would provide bicycle rentals, storage, and changing space in the Mobility Hub as a component of the Transit Plaza. The availability of these services and spaces would encourage the use of bicycles for transportation to and from uses on the Project site and the Project site vicinity. Like the Approved Project, the proposed Modified Project would not allow on-street parking or other design features, such as line-of-sight obstructions, that would increase conflicts between cyclists and vehicles. Therefore, because neither project would result in a regular increase in bicycle/vehicle conflict, impacts with respect to bicycle access and safety would be less than significant.

[1] Under the Los Angeles Municipal Code, Section 12.21.A.4, 1,421 parking spaces are required for 710,450 square feet of office, 78 parking spaces are required for 19,500 square feet of retail, and 40 spaces are required for a 200-seat private screening room, for a total of 1,539 parking spaces

Accordingly, as compared to the Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to bicycle access and safety.

Similar to the proposed Modified Project, Alternative 9 could have access impacts with regard to bicycle activity as well as pedestrian activity due to the relatively high volume of bikes and pedestrians within Century City. Project Design Feature TRA-8 would mitigate this potential impact. As noted in Project Design Feature TRA-8, the Applicant would install an audible buzzer system to indicate the approach of an exiting vehicle from the alley bordering the northern edge of the Project site at Avenue of the Stars and would install convex mirrors at exit points where visibility is hindered. With the implementation of this system, no significant impact would occur.

Similarly, Alternative 9 is designed to encourage bicycle use by providing bicycle rentals, storage, and changing space in the Mobility Hub as a component of the Transit Plaza. The availability of these services and spaces would encourage the use of bicycles for transportation to and from uses on the Project site and the Project site vicinity. Like the proposed Modified Project, Alternative 9 would not allow on-street parking or other design features, such as line-of-sight obstructions, that would increase conflicts between cyclists and vehicles. Therefore, Alternative 9 would not result in a regular increase in bicycle/vehicle conflict. As such, impacts of Alternative 9 with respect to bicycle access and safety would be less than significant and similar to those of the proposed Modified Project compared to the Approved Project.

Pedestrian Access and Safety. The Approved Project would have located a high-density residential use within walking distance of a range of commercial, retail, and entertainment uses, and as such, would have increased pedestrian activity in the area. Similarly, the proposed Modified Project would incorporate pedestrian amenities including a 35,000-square foot open Transit Plaza at the corner of Avenue of the Stars and Constellation Boulevard. The Transit Plaza would be open-air and would be accessible to pedestrians using the sidewalks on Constellation Boulevard and Avenue of the Stars. The variety of transit, retail, and entertainment resources available on the site would increase pedestrian activity in the area. Pedestrian access to the proposed Modified Project site would be facilitated by existing sidewalks along Constellation Boulevard and Avenue of the Stars.

The Approved Project also would have included construction of a pedestrian walkway along the eastern perimeter of the Project site and the proposed Modified Project would include a pedestrian walkway along both the northern and eastern perimeter of the project site, consistent with the description of mid-block pedestrian pathways in the Century City North Specific Plan (Project Design Feature VIS-5). In the existing condition, Century City has a mature network of crosswalks and pedestrian safety features, including signalized crosswalks at the intersection of Avenue of the Stars and Constellation Boulevard. Both the Approved Project and the proposed Modified Project would include landscaped parkways that would separate pedestrians from the public street, and, therefore, enhance pedestrian safety. In addition, driveways would feature enhanced pedestrian safety features that may include additional signage and decorative paving. Because both the Approved Project and the proposed Modified Project would support pedestrian safety with landscaped parkways and well-marked driveway crossings, neither project would result in a regular increase in pedestrian/vehicle conflicts. Therefore, because neither project would result in a regular increase in pedestrian/vehicle conflict, impacts with respect to pedestrian access and safety would be less than significant. Accordingly, as compared to the Approved Project, the proposed Modified Project would not involve

new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to pedestrian access and safety.

Similarly, Alternative 9 would include a pedestrian walkway along both the northern and eastern perimeter of the Project site, consistent with the description of mid-block pedestrian pathways in the Century City North Specific Plan (Project Design Feature VIS-5). Alternative 9 would include landscaped parkways that would separate pedestrians from the public street, and, therefore, enhance pedestrian safety. In addition, driveways would feature enhanced pedestrian safety features that may include additional signage and decorative paving. Because Alternative 9 would support pedestrian safety with landscaped parkways and well-marked driveway crossings, Alternative 9 would not result in a regular increase in pedestrian/vehicle conflicts. Therefore, impacts of Alternative 9 with respect to pedestrian access and safety would be less than significant and similar to those of the proposed Modified Project compared to the Approved Project.

Neighborhood Traffic Intrusion. In response to comments received during the scoping process regarding cut-through traffic through Beverly Glen, Cheviot Hills, the Palms neighborhood, and the residential developments bound by Santa Monica Boulevard, Pico Boulevard, Beverly Glen Boulevard, and Sepulveda Boulevard, the potential for the proposed Modified Project to result in neighborhood traffic intrusion impacts is analyzed herein. Such impacts were not analyzed in the 2006 EIR for the Approved Project; therefore, it is not possible to compare the potential neighborhood traffic intrusion impacts of the proposed Modified Project to those of the Approved Project.

Based on LADOT policy, identification of any potential neighborhood intrusion impacts requires meeting three different criteria. (See Transportation Study, Chapter 13, Appendix C to the Subsequent EIR.) The first of these is to assess whether any roadways would experience an increase of more than 1,200 daily project trips. The second is to identify whether the intersections along those roadways operate at LOS E or F, and the third is to identify parallel residential streets that could serve as cut-through routes during congested periods. There are no residential streets that would provide cut-through opportunities for vehicles in the immediate vicinity of any of the corridors that would meet the first criteria. Therefore, the remaining two criteria would not be met for any of the trip generation rates or horizon years. Therefore, impacts of the proposed Modified Project compared to the Approved Project with respect to neighborhood traffic intrusion would be less than significant.

Because of the slightly lower average daily traffic (ADT) for Alternative 9 compared to the proposed Modified Project compared to the Approved Project, neighborhood traffic intrusion impacts would be similar to or slightly less than those of the proposed Modified Project compared to the Approved Project. Therefore, impacts of Alternative 9 with respect to neighborhood traffic intrusion would be less than significant and similar to or slightly less than those of the proposed Modified Project as compared to the Approved Project.

Page 3-60, second full paragraph, is revised as follows:

Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. As shown on Table 3.1.D, no intersections would be significantly impacted by Alternative 9 under the Economy Adjustment Rate following the implementation of

Mitigation Measures 4.2.1, 4.2.2 and 4.2.3. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis (but not under the Empirical or Economy Adjustment rate), this bus service has been added to the phased mitigation program provided in Mitigation Measures 4.2.5.1 and 4.2.5.2 and is discussed under the Published Rates analysis below.

Page 3-68, last full paragraph, and Mitigation Measure 4.2.5 (page 3-68 and 3-69), are revised as follows:

Mitigation measures for the proposed Modified Project traffic impacts (Mitigation Measures 4.2.1 through 4.2.5) have been identified and are discussed in Section 4.2.13 of the Draft Subsequent EIR. Mitigation Measures 4.2.1, 4.2.2, and 4.2.3 would apply to Alternative 9 as they would to the proposed Modified Project. However, because Alternative 9 would generate fewer daily and peak-hour trips and would add fewer trips to the Study Area, the mitigation program proposed for the proposed Modified Project would be modified for Alternative 9 traffic impacts. Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis, the additional bus service previously required under Mitigation Measure 4.2.4 for the proposed Modified Project would be added to the phased mitigation program under Mitigation Measure 4.2.5 for Alternative 9. Provided below are the revisions to Mitigation Measure 4.2.5 (which becomes Mitigation Measures 4.2.5.1 and 4.2.5.2) as it would apply to Alternative 9:

Mitigation Measure 4.2.5.1: Mitigation Measure 4.2.5.1 is applicable to the proposed Enhanced Retail Alternative under any trip generation scenario (Empirical Rate, Economy Adjustment, Published Rates) if the Westside Subway Extension is not operating in Century City in year 2021 or by the date that the Certificate of Occupancy is issued for the Enhanced Retail Alternative, whichever is earlier. In order to provide additional transportation capacity and mitigate traffic impacts, the Applicant shall pay to provide additional peak hour bus service for the Metropolitan Transportation Authority (Metro) Rapid Line 704 on Santa Monica Boulevard. A new articulated bus for Santa Monica Metro Rapid Line 704 shall be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. The Applicant shall pay $750,000 toward the procurement of a new 40-foot bus and an average of $110,000 per year for 10 years ($1,100,000 total) toward the operating and maintenance costs for morning and afternoon peak hour service. Farebox revenues and State and Federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period. This bus shall no longer be required to be provided upon completion of the Westside Subway Extension to Century City.

Mitigation Measure 4.2.5.2: The Enhanced Retail Alternative shall be subject to on-going monitoring to ensure that the actual automobile trip generation is at or below the projected afternoon peak hour estimate for the

Enhanced Retail Alternative with Economy Adjustment (392 peak hour trips).

LADOT has established this on-going monitoring program to determine if additional transit mitigation shall be required in the event that the Enhanced Retail Alternative exceeds 392 afternoon peak hour automobile trips. For this purpose, LADOT has established four afternoon peak hour automobile trip generation thresholds: (i) 392 trips; (ii) 451 trips; (iii) 510 trips; and (iv) 588 trips (together, the "Trip Generation Thresholds"), the exceedance of which shall require the Applicant to implement additional transit mitigation measures as provided below.

Monitoring of automobile trips to and from the Project site shall occur on a real-time basis using video cameras mounted above the Enhanced Retail Alternative's driveways. The cameras shall operate 24 hours a day, 7 days a week. The cameras and the count system shall be connected to the LADOT Traffic Management Center or another appropriate facility of LADOT's selection.

The Enhanced Retail Alternative's trip generation level shall be the average of the Monday through Friday afternoon peak hour automobile trips in and out of the Enhanced Retail Alternative driveways (excluding any federal, State, or local holidays). The Enhanced Retail Alternative's building operator shall provide weekly reports of the average trip generation level to LADOT. LADOT shall review the weekly reports and compare the Enhanced Retail Alternative's weekly average trip generation level to the Trip Generation Thresholds.

Should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed a number that is 10 percent below any of the four Trip Generation Thresholds for four consecutive weeks, the building operator shall in good faith implement additional or modified trip reduction measures with the goal of helping to ensure that the Enhanced Retail Alternative's trips do not exceed the applicable Trip Generation Threshold. Further, should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed any of the four Trip Generation Thresholds for four consecutive weeks, the Enhanced Retail Alternative shall undergo a three-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Such measures may include, but are not limited to, modifications to the Transportation Demand Management Program (see Project Design Feature TRA-3). Weekly average afternoon peak hour trip generation measurements during the final four weeks of the three-month probationary period shall determine the effectiveness of the additional trip reduction

measures. Pursuant to this process, if the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level in the final four weeks of the three-month probationary period exceeds any of the four Trip Generation Thresholds, the phase mitigation program described below would apply based on the threshold exceeded.

The phased mitigation program requires the implementation of the following transit measures at the time that each of the specified Trip Generation Thresholds is exceeded for the first time following the three month probationary period:

- At 392 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid 7 shall be added on Pico Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 451 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Line 5 shall be added on Olympic Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 510 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Line 5 shall be added on Olympic Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.
- At 588 trips, a 40-foot bus for Metro Line 4 shall be added on Santa Monica Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.

If required by the phased mitigation program, the Applicant shall be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues from each bus, as calculated by the appropriate transit agency (e.g., Metro or Santa Monica BBB) and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

In addition, if the articulated bus on Santa Monica Boulevard as provided in Mitigation Measure 4.2.5.1 has not been provided because the Westside Subway Extension has been completed to Century City, this bus shall be provided at 404 afternoon peak hour trips following the three month probationary period described above. The Applicant shall pay $750,000 for procurement and an average of $110,000 per year for 10 years for an articulated bus on Metro Rapid Line 704 traveling eastbound during the morning peak hour and

westbound during the afternoon peak hour. Farebox revenues from this bus, as calculated by the appropriate transit agency, and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

The monitoring program described in this mitigation measure shall continue for a minimum of five years after full occupancy of the Enhanced Retail Alternative (defined as having leased 88% of the building's gross leasable area). If during that period the Enhanced Retail Alternative's trip generation level exceeds any of the Trip Generation Thresholds following the three month probationary period described above, the monitoring program shall continue for an additional five years following the exceedance. The monitoring program shall cease when five years of monitoring demonstrate a stable trip generation level (defined as not exceeding the next highest of the Trip Generation Thresholds).

~~**Mitigation Measure 4.2.5:**~~ ~~Alternative 9 shall be subject to on-going monitoring to ensure that the actual trip generation is at or below the level of traffic that could significantly impact an intersection prior to mitigation (392 afternoon peak hour trips). Monitoring of trips to and from the Project site shall occur on a real-time basis using video cameras mounted above Alternative 9's driveways. The cameras shall operate 24 hours a day, 7 days a week. Should the actual trip rates exceed 392 afternoon peak hour trips for three consecutive months, Alternative 9 shall undergo a six-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Pursuant to this process, if after the six-month probationary period the trip monitoring resulted in rates above 392 afternoon peak hour trips, the following would apply.~~

~~In order to provide additional transportation capacity and to mitigate the Alternative 9 with Published Rates traffic impacts, the Applicant shall pay to provide additional peak-hour bus service on Pico Boulevard, Santa Monica Boulevard, and Olympic Boulevard, if required, based on the phased mitigation program described below. If required by the phased mitigation program, the following buses would be added to these corridors:~~

- ~~A 40-foot bus for the Santa Monica BBB Rapid 7 on Pico Boulevard~~
- ~~An articulated bus for Metro Rapid Line 704 on Santa Monica Boulevard~~
- ~~Two 40-foot buses for the Santa Monica BBB Line 5 on Olympic Boulevard~~
- ~~A 40-foot bus for Metro Line 4 on Santa Monica Boulevard~~

~~On Pico Boulevard, a new 40-foot bus for Santa Monica BBB Rapid 7 would be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. On Olympic Boulevard, one 40-foot bus would be added in each direction on the Santa Monica BBB Line 5 during the morning and afternoon peak hours. On Santa Monica Boulevard a new 40-foot bus for Metro Line 4 would be added that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.~~

~~These measures would be implemented according to the following schedule based on afternoon peak hour trips over the limit of the afternoon peak hour (i.e., 392 afternoon peak hour trips), following the six-month probationary period described above:~~

- ~~At 392 trips, the 40-foot bus on Pico Boulevard~~
- ~~At 404 trips, the articulated bus on Santa Monica Boulevard~~
- ~~At 451 trips, the first 40-foot bus on Olympic Boulevard~~
- ~~At 510 trips, the second 40-foot bus on Olympic Boulevard~~
- ~~At 588 trips, the 40-foot bus on Santa Monica Boulevard~~

~~If required by the phased mitigation program, the Applicant would be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues and state or federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period.~~

The last paragraph which begins on page 3-72 and ends on page 3-81, is revised as follows:

> Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. As shown on Table 3.1.E, no intersections would be significantly impacted by Alternative 9 under the Economy Adjustment Rate following the implementation of Mitigation Measures 4.2.1, 4.2.2 and 4.2.3. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis (but not under the Empirical and Economy Adjustment rates), this bus service has been added to the phased mitigation program provided in Mitigation Measures 4.2.5.1 and 4.2.5.2 and is discussed under the Published Rates analysis below.

Page 3-83, first full paragraph, and Mitigation Measure 4.2.5 (pages 3-83 and 3-84) are revised as follows:

Mitigation measures for the proposed Modified Project traffic impacts (Mitigation Measures 4.2.1 through 4.2.5) have been identified and are discussed in Section 4.2.13 of the Draft Subsequent EIR. Mitigation Measures 4.2.1, 4.2.2, and 4.2.3 would apply to Alternative 9 as they would to the proposed Modified Project. However, because Alternative 9 would generate fewer daily and peak-hour trips and would add fewer trips to the Study Area, the mitigation program proposed for the proposed Modified Project would be modified for Alternative 9 traffic impacts. Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis, the additional bus service previously required under Mitigation Measure 4.2.4 for the proposed Modified Project would be added to the phased mitigation program under Mitigation Measure 4.2.5 for Alternative 9. Provided below are the revisions to Mitigation Measure 4.2.5 (which becomes Mitigation Measures 4.2.5.1 and 4.2.5.2) as it would apply to Alternative 9:

Mitigation Measure 4.2.5.1: Mitigation Measure 4.2.5.1 is applicable to the proposed Enhanced Retail Alternative under any trip generation scenario (Empirical Rate, Economy Adjustment, Published Rates) if the Westside Subway Extension is not operating in Century City in year 2021 or by the date that the Certificate of Occupancy is issued for the Enhanced Retail Alternative, whichever is earlier. In order to provide additional transportation capacity and mitigate traffic impacts, the Applicant shall pay to provide additional peak hour bus service for the Metropolitan Transportation Authority (Metro) Rapid Line 704 on Santa Monica Boulevard. A new articulated bus for Santa Monica Metro Rapid Line 704 shall be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. The Applicant shall pay $750,000 toward the procurement of a new 40-foot bus and an average of $110,000 per year for 10 years ($1,100,000 total) toward the operating and maintenance costs for morning and afternoon peak hour service. Farebox revenues and State and Federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period. This bus shall no longer be required to be provided upon completion of the Westside Subway Extension to Century City.

Mitigation Measure 4.2.5.2: The Enhanced Retail Alternative shall be subject to on-going monitoring to ensure that the actual automobile trip generation is at or below the projected afternoon peak hour estimate for the Enhanced Retail Alternative with Economy Adjustment (392 peak hour trips).

LADOT has established this on-going monitoring program to determine if additional transit mitigation shall be required in the event that the Enhanced Retail Alternative exceeds 392 afternoon peak hour automobile trips. For this purpose, LADOT has established four afternoon peak hour automobile trip generation thresholds: (i) 392 trips; (ii) 451 trips; (iii) 510 trips; and (iv) 588

trips (together, the "Trip Generation Thresholds"), the exceedance of which shall require the Applicant to implement additional transit mitigation measures as provided below.

Monitoring of automobile trips to and from the Project site shall occur on a real-time basis using video cameras mounted above the Enhanced Retail Alternative's driveways. The cameras shall operate 24 hours a day, 7 days a week. The cameras and the count system shall be connected to the LADOT Traffic Management Center or another appropriate facility of LADOT's selection.

The Enhanced Retail Alternative's trip generation level shall be the average of the Monday through Friday afternoon peak hour automobile trips in and out of the Enhanced Retail Alternative driveways (excluding any federal, State, or local holidays). The Enhanced Retail Alternative's building operator shall provide weekly reports of the average trip generation level to LADOT. LADOT shall review the weekly reports and compare the Enhanced Retail Alternative's weekly average trip generation level to the Trip Generation Thresholds.

Should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed a number that is 10 percent below any of the four Trip Generation Thresholds for four consecutive weeks, the building operator shall in good faith implement additional or modified trip reduction measures with the goal of helping to ensure that the Enhanced Retail Alternative's trips do not exceed the applicable Trip Generation Threshold. Further, should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed any of the four Trip Generation Thresholds for four consecutive weeks, the Enhanced Retail Alternative shall undergo a three-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Such measures may include, but are not limited to, modifications to the Transportation Demand Management Program (see Project Design Feature TRA-3). Weekly average afternoon peak hour trip generation measurements during the final four weeks of the three-month probationary period shall determine the effectiveness of the additional trip reduction measures. Pursuant to this process, if the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level in the final four weeks of the three-month probationary period exceeds any of the four Trip Generation Thresholds, the phase mitigation program described below would apply based on the threshold exceeded.

The phased mitigation program requires the implementation of the following transit measures at the time that each of the specified Trip

Generation Thresholds is exceeded for the first time following the three month probationary period:

- At 392 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid 7 shall be added on Pico Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 451 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid Line 5 shall be added on Olympic Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 510 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid Line 5 shall be added on Olympic Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.
- At 588 trips, a 40-foot bus for Metro Line 4 shall be added on Santa Monica Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.

If required by the phased mitigation program, the Applicant shall be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues from each bus, as calculated by the appropriate transit agency (e.g., Metro or Santa Monica BBB) and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

In addition, if the articulated bus on Santa Monica Boulevard as provided in Mitigation Measure 4.2.5.1 has not been provided because the Westside Subway Extension has been completed to Century City, this bus shall be provided at 404 afternoon peak hour trips following the three month probationary period described above. The Applicant shall pay $750,000 for procurement and an average of $110,000 per year for 10 years for an articulated bus on Metro Rapid Line 704 traveling eastbound during the morning peak hour and westbound during the afternoon peak hour. Farebox revenues from this bus, as calculated by the appropriate transit agency, and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

The monitoring program described in this mitigation measure shall continue for a minimum of five years after full occupancy of the Enhanced Retail Alternative (defined as having leased 88% of the

building's gross leasable area). If during that period the Enhanced Retail Alternative's trip generation level exceeds any of the Trip Generation Thresholds following the three month probationary period described above, the monitoring program shall continue for an additional five years following the exceedance. The monitoring program shall cease when five years of monitoring demonstrate a stable trip generation level (defined as not exceeding the next highest of the Trip Generation Thresholds).

~~**Mitigation Measure 4.2.5:**~~ ~~Alternative 9 shall be subject to on-going monitoring to ensure that the actual trip generation is at or below the level of traffic that could significantly impact an intersection prior to mitigation (392 afternoon peak hour trips). Monitoring of trips to and from the Project site shall occur on a real-time basis using video cameras mounted above Alternative 9's driveways. The cameras shall operate 24 hours a day, 7 days a week. Should the actual trip rates exceed 392 afternoon peak hour trips for three consecutive months, Alternative 9 shall undergo a six-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Pursuant to this process, if after the six-month probationary period the trip monitoring resulted in rates above 392 afternoon peak hour trips, the following would apply.~~

~~In order to provide additional transportation capacity and to mitigate the Alternative 9 with Published Rates traffic impacts, the Applicant shall pay to provide additional peak hour bus service on Pico Boulevard, Santa Monica Boulevard, and Olympic Boulevard, if required, based on the phased mitigation program described below. If required by the phased mitigation program, the following buses would be added to these corridors:~~

- ~~A 40-foot bus for the Santa Monica BBB Rapid 7 on Pico Boulevard~~
- ~~An articulated bus for Metro Rapid Line 704 on Santa Monica Boulevard~~
- ~~Two 40-foot buses for the Santa Monica BBB Line 5 on Olympic Boulevard~~
- ~~A 40-foot bus for Metro Line 4 on Santa Monica Boulevard~~

~~On Pico Boulevard, a new 40-foot bus for Santa Monica BBB Rapid 7 would be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. On Olympic Boulevard, one 40-foot bus would be added in each direction on the Santa Monica BBB Line 5 during the morning and afternoon peak hours. On Santa Monica Boulevard a new 40-foot bus for Metro Line 4 would be added that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.~~

~~These measures would be implemented according to the following schedule based on afternoon peak hour trips over the limit of the afternoon peak hour (i.e., 392 afternoon peak hour trips), following the six-month probationary period described above:~~

- ~~At 392 trips, the 40-foot bus on Pico Boulevard~~
- ~~At 404 trips, the articulated bus on Santa Monica Boulevard~~
- ~~At 451 trips, the first 40-foot bus on Olympic Boulevard~~
- ~~At 510 trips, the second 40-foot bus on Olympic Boulevard~~
- ~~At 588 trips, the 40-foot bus on Santa Monica Boulevard~~

~~If required by the phased mitigation program, the Applicant would be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues and state or federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period.~~

The last paragraph which begins on page 3-87 and ends on page 3-97, is revised as follows:

Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. As shown on Table 3.1.F, no intersections would be significantly impacted by Alternative 9 under the Economy Adjustment Rate following the implementation of Mitigation Measures 4.2.1, 4.2.2 and 4.2.3. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis (but not under the Empirical or Economy Adjustment rate), this bus service has been added to the phased mitigation program provided in Mitigation Measures 4.2.5.1 and 4.2.5.2 and is discussed under the Published Rates analysis below.

Page 3-99, first full paragraph, and Mitigation Measure 4.2.5 (pages 3-99 and 3-100), are revised as follows:

Mitigation measures for the proposed Modified Project traffic impacts (Mitigation Measures 4.2.1 through 4.2.5) have been identified and are discussed in Section 4.2.13 of the Draft Subsequent EIR. Mitigation Measures 4.2.1, 4.2.2, and 4.2.3 would apply to Alternative 9 as they would to the proposed Modified Project. However, because Alternative 9 would generate fewer daily and peak-hour trips and would add fewer trips to the Study Area, the mitigation program proposed for the proposed Modified Project would be modified for Alternative 9 traffic impacts. Specifically, Mitigation Measure 4.2.4 for the proposed Modified Project would not apply to Alternative 9 because additional bus service on Pico Boulevard would not be required to mitigate Alternative 9's traffic impacts. However, because the addition of the bus service on Pico Boulevard previously required by Mitigation Measure 4.2.4 would be required under the Published Rates analysis, the additional bus service previously required under Mitigation Measure 4.2.4 for the proposed Modified Project would

be added to the phased mitigation program under Mitigation Measure 4.2.5 for Alternative 9. Provided below are the revisions to Mitigation Measure 4.2.5 (which becomes Mitigation Measures 4.2.5.1 and 4.2.5.2) as it would apply to Alternative 9:

Mitigation Measure 4.2.5.1: Mitigation Measure 4.2.5.1 is applicable to the proposed Enhanced Retail Alternative under any trip generation scenario (Empirical Rate, Economy Adjustment, Published Rates) if the Westside Subway Extension is not operating in Century City in year 2021 or by the date that the Certificate of Occupancy is issued for the Enhanced Retail Alternative, whichever is earlier. In order to provide additional transportation capacity and mitigate traffic impacts, the Applicant shall pay to provide additional peak hour bus service for the Metropolitan Transportation Authority (Metro) Rapid Line 704 on Santa Monica Boulevard. A new articulated bus for Santa Monica Metro Rapid Line 704 shall be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. The Applicant shall pay $750,000 toward the procurement of a new 40-foot bus and an average of $110,000 per year for 10 years ($1,100,000 total) toward the operating and maintenance costs for morning and afternoon peak hour service. Farebox revenues and State and Federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period. This bus shall no longer be required to be provided upon completion of the Westside Subway Extension to Century City.

Mitigation Measure 4.2.5.2: The Enhanced Retail Alternative shall be subject to on-going monitoring to ensure that the actual automobile trip generation is at or below the projected afternoon peak hour estimate for the Enhanced Retail Alternative with Economy Adjustment (392 peak hour trips).

LADOT has established this on-going monitoring program to determine if additional transit mitigation shall be required in the event that the Enhanced Retail Alternative exceeds 392 afternoon peak hour automobile trips. For this purpose, LADOT has established four afternoon peak hour automobile trip generation thresholds: (i) 392 trips; (ii) 451 trips; (iii) 510 trips; and (iv) 588 trips (together, the "Trip Generation Thresholds"), the exceedance of which shall require the Applicant to implement additional transit mitigation measures as provided below.

Monitoring of automobile trips to and from the Project site shall occur on a real-time basis using video cameras mounted above the Enhanced Retail Alternative's driveways. The cameras shall operate 24 hours a day, 7 days a week. The cameras and the count system shall be connected to the LADOT Traffic Management Center or another appropriate facility of LADOT's selection.

The Enhanced Retail Alternative's trip generation level shall be the average of the Monday through Friday afternoon peak hour automobile trips in and out of the Enhanced Retail Alternative driveways (excluding any federal, State, or local holidays). The Enhanced Retail Alternative's building operator shall provide weekly reports of the average trip generation level to LADOT. LADOT shall review the weekly reports and compare the Enhanced Retail Alternative's weekly average trip generation level to the Trip Generation Thresholds.

Should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed a number that is 10 percent below any of the four Trip Generation Thresholds for four consecutive weeks, the building operator shall in good faith implement additional or modified trip reduction measures with the goal of helping to ensure that the Enhanced Retail Alternative's trips do not exceed the applicable Trip Generation Threshold. Further, should the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level exceed any of the four Trip Generation Thresholds for four consecutive weeks, the Enhanced Retail Alternative shall undergo a three-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Such measures may include, but are not limited to, modifications to the Transportation Demand Management Program (see Project Design Feature TRA-3). Weekly average afternoon peak hour trip generation measurements during the final four weeks of the three-month probationary period shall determine the effectiveness of the additional trip reduction measures. Pursuant to this process, if the Enhanced Retail Alternative's weekly average afternoon peak hour trip generation level in the final four weeks of the three-month probationary period exceeds any of the four Trip Generation Thresholds, the phase mitigation program described below would apply based on the threshold exceeded.

The phased mitigation program requires the implementation of the following transit measures at the time that each of the specified Trip Generation Thresholds is exceeded for the first time following the three month probationary period:

- At 392 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid 7 shall be added on Pico Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.
- At 451 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid Line 5 shall be added on Olympic Boulevard that travels eastbound during the morning peak hour and westbound during the afternoon peak hour.

- At 510 afternoon peak hour trips, a new 40-foot bus for Santa Monica BBB Rapid Line 5 shall be added on Olympic Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.
- At 588 trips, a 40-foot bus for Metro Line 4 shall be added on Santa Monica Boulevard that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.

If required by the phased mitigation program, the Applicant shall be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues from each bus, as calculated by the appropriate transit agency (e.g., Metro or Santa Monica BBB) and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

In addition, if the articulated bus on Santa Monica Boulevard as provided in Mitigation Measure 4.2.5.1 has not been provided because the Westside Subway Extension has been completed to Century City, this bus shall be provided at 404 afternoon peak hour trips following the three month probationary period described above. The Applicant shall pay $750,000 for procurement and an average of $110,000 per year for 10 years for an articulated bus on Metro Rapid Line 704 traveling eastbound during the morning peak hour and westbound during the afternoon peak hour. Farebox revenues from this bus, as calculated by the appropriate transit agency, and applicable State or federal transit subsidies shall be credited against the Applicant's operating and maintenance costs for the 10-year period.

The monitoring program described in this mitigation measure shall continue for a minimum of five years after full occupancy of the Enhanced Retail Alternative (defined as having leased 88% of the building's gross leasable area). If during that period the Enhanced Retail Alternative's trip generation level exceeds any of the Trip Generation Thresholds following the three month probationary period described above, the monitoring program shall continue for an additional five years following the exceedance. The monitoring program shall cease when five years of monitoring demonstrate a stable trip generation level (defined as not exceeding the next highest of the Trip Generation Thresholds).

~~**Mitigation Measure 4.2.5:** Alternative 9 shall be subject to on-going monitoring to ensure that the actual trip generation is at or below the level of traffic that could significantly impact an intersection prior to mitigation (392~~

~~afternoon peak hour trips). Monitoring of trips to and from the Project site shall occur on a real-time basis using video cameras mounted above Alternative 9's driveways. The cameras shall operate 24 hours a day, 7 days a week. Should the actual trip rates exceed 392 afternoon peak hour trips for three consecutive months, Alternative 9 shall undergo a six-month probationary period during which time the building operator shall be required to implement further trip reduction measures. Pursuant to this process, if after the six-month probationary period the trip monitoring resulted in rates above 392 afternoon peak hour trips, the following would apply.~~

~~In order to provide additional transportation capacity and to mitigate the Alternative 9 with Published Rates traffic impacts, the Applicant shall pay to provide additional peak hour bus service on Pico Boulevard, Santa Monica Boulevard, and Olympic Boulevard, if required, based on the phased mitigation program described below. If required by the phased mitigation program, the following buses would be added to these corridors:~~

- ~~A 40-foot bus for the Santa Monica BBB Rapid 7 on Pico Boulevard~~
- ~~An articulated bus for Metro Rapid Line 704 on Santa Monica Boulevard~~
- ~~Two 40-foot buses for the Santa Monica BBB Line 5 on Olympic Boulevard~~
- ~~A 40-foot bus for Metro Line 4 on Santa Monica Boulevard~~

~~On Pico Boulevard, a new 40-foot bus for Santa Monica BBB Rapid 7 would be added that travels eastbound during the morning peak hour and westbound during the afternoon peak hour. On Olympic Boulevard, one 40-foot bus would be added in each direction on the Santa Monica BBB Line 5 during the morning and afternoon peak hours. On Santa Monica Boulevard a new 40-foot bus for Metro Line 4 would be added that travels westbound during the morning peak hour and eastbound during the afternoon peak hour.~~

~~These measures would be implemented according to the following schedule based on afternoon peak hour trips over the limit of the afternoon peak hour (i.e., 392 afternoon peak hour trips), following the six-month probationary period described above:~~

- ~~At 392 trips, the 40-foot bus on Pico Boulevard~~
- ~~At 404 trips, the articulated bus on Santa Monica Boulevard~~
- ~~At 451 trips, the first 40-foot bus on Olympic Boulevard~~
- ~~At 510 trips, the second 40-foot bus on Olympic Boulevard~~

~~• At 588 trips, the 40-foot bus on Santa Monica Boulevard~~

~~If required by the phased mitigation program, the Applicant would be responsible for the cost of procurement of the buses as well as a portion of the operating and maintenance costs for 10 years. For the 40-foot buses, the Applicant shall pay $500,000 each for procurement and an average of $103,000 per year for 10 years. Farebox revenues and state or federal transit subsidies shall be credited against operating and maintenance costs for the 10-year period.~~

Page 3-101, the following text is after the first full paragraph:

Public Transit. A total of approximately 1,464 on-site employees are expected to result from the proposed Modified Project. If 20 percent of employees use transit, the proposed Modified Project is expected to add 293 inbound and 293 outbound daily transit trips to the transit system. The proposed Modified Project will be designed to promote non-auto travel through design and orientation that is pedestrian-friendly and facilitates transit use. The proposed components of the proposed Modified Project that would greatly encourage transit use by the patrons of the proposed Modified Project include the provision of a Mobility Hub on the Project site and implementation of a Transportation Demand Management program (Project Design Feature TRA-3).

Based on the anticipated number of transit trips generated by the proposed Modified Project, the anticipated demand from the proposed Modified Project would be more than satisfied by the overall existing capacity surplus. In total, the transit system has residual capacity of 3,285 riders during the morning peak period and a residual capacity of 4,133 riders during the afternoon peak period. (See Table 4.2.E in Section 4.2, Traffic and Circulation, in the Draft Subsequent EIR.) Therefore, the proposed Modified Project is not expected to significantly impact the regional transit system.

Alternative 9 would provide long-term employment for approximately 1,467 employees. If 20 percent of employees use transit, Alternative 9 is expected to add 293 inbound and 293 outbound daily transit trips to the transit system. Based on the anticipated number of transit trips generated by the Alternative 9, the anticipated demand from the Alternative 9 would be more than satisfied by the overall existing capacity surplus and Alternative 9 is not expected to significantly impact the regional transit system. Therefore, impacts of Alternative 9 to transit services would be less than significant and similar to those of the proposed Modified Project compared to existing conditions.

Parking. The Los Angeles Municipal Code (LAMC), Section 12.21.A.4 requires the use of a parking ratio of one parking space for every 500 square feet of gross floor area. Retail establishments are required to provide at least four automobile parking spaces for each 1,000 sf of gross floor area and at least one automobile parking space is required for each five seats contained within any theatre. Under the Los Angeles Municipal Code, Section 12.21.A.4, a total of 1,509 spaces are required to serve the proposed Modified Project's proposed uses. The proposed Modified Project would comply with code requirements by providing a total of 1,579 spaces in an on-site parking structure. Accordingly, parking impacts for the proposed Modified Project would be less than significant.

Alternative 9 would include the same amount of built square footage as the proposed Modified Project (731,250 square feet); however, under Alternative 9, 15,380 square feet of the Modified

Project's proposed low-rise office space would be converted to ancillary retail space. Under the Los Angeles Municipal Code (LAMC), a total of 1,539 spaces are required to serve Alternative 9's proposed uses.[1] Alternative 9 would comply with code requirements and would provide a total of up to 1,579 spaces in an on-site parking structure, which is the same number of spaces that would be provided by the proposed Modified Project. Therefore, parking impacts of Alternative 9 would be less than significant and similar to the proposed Modified Project compared to existing conditions.

Page 3-101, the following text is added after the last paragraph:

Pedestrian/Bicycle Safety.

Bicycle Access and Safety. There is an existing network of bicycle lanes in the vicinity of the Project site; however, no dedicated bicycle lanes currently exist on Constellation Boulevard or Avenue of the Stars. As part of the City of Los Angeles' 2010 Bicycle Plan (adopted March 1, 2011), a bicycle lane on Avenue of the Stars between Santa Monica Boulevard and Pico Boulevard is proposed as part of the Backbone Bikeway Network. As of the time of the publication of this report, the Avenue of the Stars bicycle lane has not been approved, and LADOT and the City are currently in the process of investigating potential alternative lanes at other locations in Century City. If the bicycle lane is implemented based on its proposed location, the alley bordering the northern edge of the Project site would intersect with this bike lane at Avenue of the Stars. Though potential bicycle traffic volume at this location cannot be accurately predicted, this analysis conservatively assumes that there could be access impacts with regard to bicycle activity as well as pedestrian activity due to the relatively high volume of bikes and pedestrians within Century City.

Project Design Feature TRA-8 would mitigate this potential impact. As noted in Project Design Feature TRA-8, the Applicant would install an audible buzzer system to indicate the approach of an exiting vehicle from the alley bordering the northern edge of the Project site at Avenue of the Stars and would install convex mirrors at exit points where visibility is hindered. With the implementation of this system, no significant impact would occur.

The proposed Modified Project is designed to encourage bicycle use. The proposed Modified Project would provide bicycle rentals, storage, and changing space in the Mobility Hub as a component of the Transit Plaza. The availability of these services and spaces would encourage the use of bicycles for transportation to and from uses on the Project site and the Project site vicinity. However, the proposed Modified Project would not allow on-street parking or other design features, such as line-of-sight obstructions, that would increase conflicts between cyclists and vehicles. Therefore, because the proposed Modified Project would not result in a regular increase in bicycle/vehicle conflict, impacts with respect to bicycle access and safety would be less than significant.

Similar to the proposed Modified Project, Alternative 9 could have access impacts with regard to bicycle activity as well as pedestrian activity due to the relatively high volume of bikes and pedestrians within Century City. Project Design Feature TRA-8 would mitigate this potential impact. As noted in Project Design Feature TRA-8, the Applicant would install an audible buzzer system to indicate the approach of an exiting vehicle from the alley bordering the northern edge of the Project

[1] Under the Los Angeles Municipal Code, Section 12.21.A.4, 1,421 parking spaces are required for 710,450 square feet of office, 78 parking spaces are required for 19,500 square feet of retail, and 40 spaces are required for a 200-seat private screening room, for a total of 1,539 parking spaces.

site at Avenue of the Stars and would install convex mirrors at exit points where visibility is hindered. With the implementation of this system, no significant impact would occur.

Similarly, Alternative 9 is designed to encourage bicycle use by providing bicycle rentals, storage, and changing space in the Mobility Hub as a component of the Transit Plaza. The availability of these services and spaces would encourage the use of bicycles for transportation to and from uses on the Project site and the Project site vicinity. Like the proposed Modified Project, Alternative 9 would not allow on-street parking or other design features, such as line-of-sight obstructions, that would increase conflicts between cyclists and vehicles. Therefore, Alternative 9 would not result in a regular increase in bicycle/vehicle conflict. As such, impacts of Alternative 9 with respect to bicycle access and safety would be less than significant and similar to those of the proposed Modified Project compared to existing conditions.

Pedestrian Access and Safety. The proposed Modified Project would incorporate pedestrian amenities including a 35,000-square foot open Transit Plaza at the corner of Avenue of the Stars and Constellation Boulevard. The Transit Plaza would be open-air and would be accessible to pedestrians using the sidewalks on Constellation Boulevard and Avenue of the Stars. The variety of transit, retail, and entertainment resources available on the site would increase pedestrian activity in the area. Pedestrian access to the proposed Modified Project site would be facilitated by existing sidewalks along Constellation Boulevard and Avenue of the Stars.

The proposed Modified Project also includes construction of a pedestrian walkway along the northern and eastern perimeter of the Project site, consistent with the description of mid-block pedestrian pathways in the Century City North Specific Plan (Project Design Feature VIS-5). In the existing condition, Century City has a mature network of crosswalks and pedestrian safety features, including signalized crosswalks at the intersection of Avenue of the Stars and Constellation Boulevard. The proposed Modified Project would include landscaped parkways that would separate pedestrians from the public street, and, therefore, enhance pedestrian safety. In addition, driveways would feature enhanced pedestrian safety features that may include additional signage and decorative paving. The proposed Modified Project would support pedestrian safety with landscaped parkways and well-marked driveway crossings, and would not result in a regular increase in pedestrian/vehicle conflicts. Therefore, because the proposed Modified Project would not result in a regular increase in pedestrian/ vehicle conflict, impacts with respect to pedestrian access and safety would be less than significant.

Similarly, Alternative 9 would include a pedestrian walkway along both the northern and eastern perimeter of the project site, consistent with the description of mid-block pedestrian pathways in the Century City North Specific Plan (Project Design Feature VIS-5). Alternative 9 would include landscaped parkways that would separate pedestrians from the public street, and, therefore, enhance pedestrian safety. In addition, driveways would feature enhanced pedestrian safety features that may include additional signage and decorative paving. Because Alternative 9 would support pedestrian safety with landscaped parkways and well-marked driveway crossings, Alternative 9 would not result in a regular increase in pedestrian/vehicle conflicts. Therefore, impacts of Alternative 9 with respect to pedestrian access and safety would be less than significant and the same as those for the proposed Modified Project compared to existing conditions.

Neighborhood Traffic Intrusion. In response to comments received during the scoping process regarding cut-through traffic through Beverly Glen, Cheviot Hills, the Palms neighborhood, and the residential developments bound by Santa Monica Boulevard, Pico Boulevard, Beverly Glen Boulevard, and Sepulveda Boulevard, the potential for the proposed Modified Project to result in neighborhood traffic intrusion impacts is analyzed herein.

Based on LADOT policy, identification of any potential neighborhood intrusion impacts requires meeting three different criteria. (See Transportation Study, Chap. 13, Appendix C to the Subsequent EIR.) The first of these is to assess whether any roadways would experience an increase of more than 1,200 daily project trips. The second is to identify whether the intersections along those roadways operate at LOS E or F, and the third is to identify parallel residential streets that could serve as cut-through routes during congested periods. There are no residential streets that would provide cut-through opportunities for vehicles in the immediate vicinity of any of the corridors that would meet the first criteria. Therefore, the remaining two criteria would not be met for any of the trip generation rates or horizon years. Therefore, impacts of the proposed Modified Project compared to existing conditions with respect to neighborhood traffic intrusion would be less than significant.

Because of the slightly lower average daily traffic (ADT) for Alternative 9 as compared to the proposed Modified Project vs, existing conditions scenario, neighborhood traffic intrusion impacts would be similar to or slightly less than those of the proposed Modified Project compared to existing conditions. Therefore, impacts of Alternative 9 with respect to neighborhood traffic intrusion would be less than significant and similar to or slightly less than those of the proposed Modified Project as compared to existing conditions.

In addition, a supplemental analysis of intersections south of Pico Boulevard within the Beverlywood neighborhood was conducted (see Topical Response 3 in Chapter 4.0 of this Final Subsequent EIR). The proposed Modified Project's traffic was analyzed for potential impacts to the intersections of Beverwil Drive & Cashio Street and Beverly Drive & Cashio Street using the same assumptions and methodologies as the study intersections in the Transportation Study, under each of the three analysis years (2011, 2015, and 2021) and each of the three trip generation rates (the Empirical Rate, the Economy Adjustment Rate, and the Published Rates). None of the mitigation proposed in the Draft Subsequent EIR was implemented as part of this analysis. This analysis showed that these intersections would not be significantly impacted with proposed Modified Project traffic under any scenario. Accordingly, this supplemental analysis further confirmed that this neighborhood would not be significantly impacted by proposed Modified Project traffic. Alternative 9, which contains the same uses as the proposed Modified Project but would generate fewer trips due to a decrease in office square footage, also would have a less than significant impact at these intersections and would not significantly impact the Beverlywood neighborhood. Therefore, impacts of Alternative 9 with respect to traffic impacts to intersections within the Beverlywood neighborhood would be less than significant and similar to or slightly less than those of the proposed Modified Project as compared to existing conditions.

Page 3-103, the following text is added before the first full paragraph:

The strong aesthetic components that represent Century City's valued aesthetic image are the modern high-rise towers, distinctive skyline, landscaping, and broad avenues. Both the Approved Project and the proposed Modified Project would be consistent with the visual character of Century City and would not detract from the existing style or image of the area due to density, height, bulk, setbacks,

signage, or other physical elements. The proposed Modified Project would still support the existing style, image, and profile of high-rise structures in this area of Century City, similar to the Approved Project; however, the proposed Modified Project would result in less density and building mass than what would have occurred under the Approved Project.

Page 3-104, the following text is added after the third full paragraph:

The strong aesthetic components that represent Century City's valued aesthetic image are the modern high-rise towers, distinctive skyline, landscaping, and broad avenues. The proposed Modified Project would be consistent with the visual character of Century City and would not detract from the existing style or image of the area due to density, height, bulk, setbacks, signage, or other physical elements. In addition, the proposed Modified Project would support the existing style, image, and profile of high-rise structures in this area of Century City.

Page 3-111, the following text is added after the last full paragraph:

Similarly, as shown in Table 3.1.G, because of the slightly lower ADT for Alternative 9, regional mobile source emissions of all pollutants due to long-term operation of Alternative 9 using the Empirical Rate would be similar to or slightly less than those of the proposed Modified Project using the same Empirical Rate and, thus, less than the corresponding SCAQMD daily emission thresholds. Therefore, the long-term operational mobile source air quality impacts of Alternative 9 would be less than significant and similar to or slightly less than those of the proposed Modified Project as compared to the Approved Project in 2015.

At the time the Draft Subsequent EIR was prepared and released for public review (March 2013), CalEEMod 2011.1 was the most current land use emissions computer model available. CalEEMod 2013.1 and CalEEMod 2013.2 were released in July and September 2013 respectively, and CalEEMod 2013.2.2 was released in October 2013. To ensure that the most accurate emissions calculations have been considered, emissions from Alternative 9 were calculated using CalEEMod 2013.2.2. The emissions calculations from CalEEMod 2013.2.2 are provided in the Additional Information Chapter of the Errata to the Final Subsequent EIR. As shown in the Additional Information Chapter, the long-term operational mobile source air quality impacts of Alternative 9 would be less than significant.

Page 3-128, the following text is added after the last paragraph:

Both the Approved Project and the proposed Modified Project are consistent with the AQMP because they: (1) do not cause or worsen an exceedance of an ambient air quality standard; (2) due to the low emissions rates, do not delay the attainment of an air quality standard; (3) are consistent with the AQMP's growth projections; and (4) implement air quality mitigation measures to the extent feasible and are consistent with the AQMP's land use policies. In addition, both the Approved Project and the proposed Modified Project would be consistent with City of Los Angeles air quality policies as they implement the air quality goals and policies set forth in the City's General Plan. Accordingly, neither the Approved Project nor the proposed Modified Project would result in a significant impact related to SCAQMD, SCAG, and City of Los Angeles air quality policies.

As discussed above, Alternative 9 would result in similar construction emissions, the same stationary operational emissions, and similar or slightly less operational mobile emissions as compared with the

proposed Modified Project compared to the Approved Project. Therefore, Alternative 9 is consistent with the AQMP because it would not cause or worsen an exceedance of an ambient air quality standard or delay the attainment of an air quality standard, is consistent with the AQMP's growth projections, would implement air quality mitigation measures to the extent feasible and is consistent with the AQMP's land use policies. In addition, Alternative 9 would be consistent with City of Los Angeles air quality policies because it would implement the air quality goals and policies set forth in the City's General Plan. As such, similar to the proposed Modified Project compared to the Approved Project, Alternative 9 would not result in a significant impact related to SCAQMD, SCAG, and City of Los Angeles air quality policies, and no mitigation is required.

Page 3-131, the following text is added before the last paragraph:

The proposed Modified Project is consistent with the AQMP because it: (1) would not cause or worsen an exceedance of an ambient air quality standard; (2) due to the low emissions rates, would not delay the attainment of an air quality standard; (3) is consistent with the AQMP's growth projections; and (4) implements air quality mitigation measures to the extent feasible and is consistent with the AQMP's land use policies. In addition, the proposed Modified Project would be consistent with City of Los Angeles air quality policies as they implement the air quality goals and policies set forth in the City's General Plan. Accordingly, the proposed Modified Project would not result in a significant impact related to SCAQMD, SCAG, and City of Los Angeles air quality policies.

As discussed above, Alternative 9 would result in similar construction emissions, the same stationary operational emissions, and similar or slightly less operational mobile emissions as compared with the proposed Modified Project compared to existing conditions. Therefore, Alternative 9 is consistent with the AQMP because it would not cause or worsen an exceedance of an ambient air quality standard or delay the attainment of an air quality standard, is consistent with the AQMP's growth projections, would implement air quality mitigation measures to the extent feasible and is consistent with the AQMP's land use policies. In addition, Alternative 9 would be consistent with City of Los Angeles air quality policies because it would implement the air quality goals and policies set forth in the City's General Plan. As such, similar to the proposed Modified Project compared to existing conditions, Alternative 9 would not result in a significant impact related to SCAQMD, SCAG, and City of Los Angeles air quality policies, and no mitigation is required.

Page 3-133, last full paragraph, is revised as follows:

In comparison, the proposed Modified Project is expected to achieve a much greater improvement over "business-as-usual" than the Approved Project due to the proposed Modified Project's increased emphasis on energy efficiency and water conservation. It was determined that the proposed Modified Project would achieve a reduction from 14,600 to 11,900 metric tons of CO_2e annually[1] (including the 30-year amortized construction and operational emissions combined), or an approximate 18.5 ~~18.8~~ percent reduction from "business-as-usual." Although the gross GHG emissions from the proposed Modified Project would be greater than those of the Approved Project, with the achievement of approximately 18.5 ~~18.8~~ percent total reduction from "business-as-usual," it was determined that the proposed Modified Project's climate change impacts with regard to GHG

[1] In order to be conservative and show the greatest amount of potential impact for GHG emissions, the most conservative trip generation factor from the Transportation Study (Appendix C of the Draft Subsequent EIR), the proposed Modified Project with Published Trip Rates, was used to calculate long-term operational emissions associated with the proposed Modified Project.

emissions would be less than significant and a greater decrease than the Approved Project's "as proposed" emissions compared to its "business-as-usual" emissions. Additionally, the proposed Modified Project would not conflict with AB 32 or other applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs because it substantially reduces project-related GHG emissions as compared to "business-as-usual" through project design. As a result, no mitigation would be required for the proposed Modified Project. Accordingly, as compared to the Approved Project, it was determined that the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to GHG emissions.

Page 3-134, first full paragraph, is revised as follows:

Alternative 9 would incorporate the same green building design features as the proposed Modified Project and would be the same size as the proposed Modified Project. Accordingly, Alternative 9 would be expected to result in the same stationary source GHG emissions as the proposed Modified Project as compared to the Approved Project. Alternative 9 ~~also~~ would generate ADT of approximately 4,528 ~~4,519~~ using the Published Rates, approximately 1.6 ~~1.8~~ percent less than the proposed Modified Project ADT using the Published Rates (the only scenario used for climate change impact analysis). As shown in Table S, Alternative 9 would result in a 17.9 percent total reduction from "business-as-usual" through implementation of Project Design Features and the full implementation of applicable State mandates, which would be a less than significant impact related to climate change. Because Alternative 9 would result in a decrease in daily traffic volumes compared to the proposed Modified Project, the total GHG emissions would be less than the proposed Modified Project. Thus, even though the GHG emissions difference between BAU and the Approved Project for both the proposed Modified Project and Alternative 9 would be the same, the percentage change would be smaller for Alternative 9. Therefore, Alternative 9's climate change impacts with regard to GHG emissions would be less than significant and a greater decrease than the Approved Project's "as proposed" emissions compared to its "business-as-usual" emissions. Additionally, Alternative 9 would not conflict with AB 32 or other applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs because it substantially reduces project-related GHG emissions as compared to "business-as-usual" through project design. ~~A slight decrease in daily traffic volumes for Alternative 9 would result in similar or slightly less GHG emissions than the proposed Modified Project. As shown in Table 3.1.S, potential climate change impacts of Alternative 9 would be similar or slightly less than those of the proposed Modified Project "as Proposed" emissions.~~ Thus, Alternative 9 would have a similar ~~or slightly greater~~ reduction from "business-as-usual" and have a climate change impact that is less than significant and similar to ~~or slightly less than~~ that of the proposed Modified Project as compared to the Approved Project.

Table 3.1.S, on page 3-134, is replaced with the following table:

Table 3.1.S: Long-Term Operational Greenhouse Gas Emissions Summary

Category	Pollutant Emissions, MT/year					
	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
Approved Project						
Business-As-Usual	96	5,300	5,400	4.0	0.06	5,480
As Proposed	45	5,200	5,250	3.8	0.05	5,320
Emissions Reduction	51	100	150	0.2	0.01	160
Percent Reduction	53%	1.9%	2.8%	5.0%	17%	2.9%
Proposed Modified Project						
Business-As-Usual	160	14,000	14,200	14	0.20	14,600
As Proposed	110	11,500	11,600	10	0.14	11,900
Emissions Reduction	50	2,500	2,600	4	0.06	2,700
Percent Reduction	31.3%	17.9%	18.3%	28.6%	30%	18.5%
Alternative 9						
Business-As-Usual	160	12,900	13,100	14	0.2	13,400
As Proposed	110	10,000	11,000	10	0.14	11,000
Emissions Reduction	50	2,900	2,100	4.0	0.06	2,400
Percent Reduction	31.3%	22.5%	16.0%	28.6%	30%	17.9%

Source: LSA Associates, Inc., May 2014.
Note: Numbers in table may not appear to add up correctly due to rounding of all numbers to two significant digits.
Bio-CO_2 = biologically generated CO_2
CH_4 = methane
CO_2 = carbon dioxide
CO_2e = carbon dioxide equivalent
MT = metric tons
N_2O = nitrous oxide
NBio-CO_2 = non-biologically generated CO_2

Page 3-135, first and second full paragraphs are revised as follows:

Operational Impacts. Operation of the proposed Modified Project would result in both direct and indirect GHG emissions generated by different types of buildings, land uses, and emissions sources. It was determined that the proposed Modified Project would achieve a reduction from 14,600 to 11,900 million tons of CO_2e annually[1] (including the 30-year amortized construction and operational emissions combined), or an approximate 18.5 ~~18.8~~ percent reduction from "business-as-usual" due to proposed Project Design Features intended to reduce energy usage and conserve water. Thus, with the reduction in GHG emissions achieved by the proposed Modified Project through project design (as compared to "business-as-usual" scenario), it was determined that the proposed Modified Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. Additionally, the proposed Modified Project would not conflict with AB 32 or other applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs because it substantially reduces project-related GHG emissions as compared to "business-as-usual" through project design. Therefore, with the achievement of a nearly 18.5 ~~18.8~~ percent total

[1] In order to be conservative and show the greatest amount of potential impact for GHG emissions, the most conservative trip generation factor from the Transportation Study (Appendix C of the Draft Subsequent EIR), the proposed Modified Project with Published Trip Rates, was used to calculate long-term operational emissions associated with the proposed Modified Project.

reduction from "business-as-usual," the proposed Modified Project's climate change impacts with regard to GHG emissions would be less than significant, and no mitigation is required.

Alternative 9 would incorporate the same green building design features as the proposed Modified Project and would be the same size as the proposed Modified Project. Accordingly, Alternative 9 would be expected to result in the same stationary source GHG emissions as the proposed Modified Project as compared to existing conditions. Alternative 9 ~~also~~ would generate a total of approximately 4,528 ~~4,519~~ ADT using the Published Rates, approximately 1.6 ~~1.8~~ percent less than the proposed Modified Project ADT using the Published Rates (the only scenario used for climate change impact analysis). As shown in Table S, this would result in a 17.9 percent total reduction from "business-as-usual," which would be a less than significant impact related to climate change. Therefore, Alternative 9's climate change impacts with regard to GHG emissions would be similar to those of the proposed Modified Project's "as proposed" emissions compared to its "business-as-usual" emissions. Additionally, Alternative 9 would not conflict with AB 32 or other applicable plans, policies, or regulations adopted for the purpose of reducing the emissions of GHGs because it substantially reduces project-related GHG emissions as compared to "business-as-usual" through project design. ~~A slight decrease in daily traffic volumes for Alternative 9 would result in similar or slightly less GHG emissions than the proposed Modified Project. As shown in Table 3.1.S, potential climate change impacts of Alternative 9 would be similar to or slightly less than those of the proposed Modified Project "as Proposed" emissions.~~ Thus, Alternative 9 would have a similar ~~or slightly greater~~ reduction from "business-as-usual" as the proposed Modified Project and have a climate change impact that is less than significant and similar to ~~or slightly less than~~ that of the proposed Modified Project as compared to existing conditions.

Page 3-136, last full paragraph, is revised as follows:

Similar to the Approved Project and the proposed Modified Project, Alternative 9 would include the construction of buildings; removal of the remnant structures, parking lot, and associated electrical components; and relocation of a water main. The remnant structures are conservatively assumed to contain asbestos-containing materials, lead-based paints, and PCB-containing fixtures. The Project site was previously used for oil production, and as such, the potential exists for contaminated soil and soil gases to be encountered during construction. In addition, construction of Alternative 9 would involve the use of chemical agents, solvents, paints, and other hazardous materials that are associated with construction activities. The amount of hazardous chemicals present during construction would be limited and would be handled in compliance with existing government regulations. The potential for the release of hazardous materials during construction is low and, even if a release were to occur, it would not result in a significant hazard to the public, surrounding land uses, or environment due to the small quantities of these materials used during construction. Further, Alternative 9 would be required to incorporate and/or comply with Project Design Features and/or Compliance Measures regarding asbestos-containing materials, lead-based paints, and/or PCBs, contaminated soils, hydrogen sulfide, methane, transport of hazardous materials, and potential alterations to previously closed oil wells. With implementation or incorporation of these measures, potentially significant impacts related to hazards and hazardous materials during construction of Alternative 9 would be less than significant. As such, Alternative 9 would have the same impacts with regard to hazards and hazardous materials during construction to the proposed Modified Project as compared to the Approved Project.

Page 3-137, first full paragraph, is revised as follows:

Similarly, operation of Alternative 9 would involve the use of potentially hazardous materials (e.g., solvents, cleaning agents, paints, fertilizers, pesticides) typical of commercial and retail uses that, when used correctly and in compliance with existing laws and regulations, would not result in significant hazards to future residents or workers in the vicinity of the Project site. The Project is located within a City-designated methane zone and would have the potential to expose future occupants to methane; therefore, Alternative 9 would ~~also~~ be required to comply with Project Design Features or Compliance Measures regarding methane and hydrogen sulfide testing and abatement. With implementation of these measures, Alternative 9 would result in a less than significant impact with regard to hazards and hazardous materials, and impacts would be similar to those of the proposed Modified Project compared to the Approved Project.

Page 3-137, the following text is added after the first full paragraph:

Due to the proximity of the Project site to the Santa Monica Airport, Alternative 9 would be required to comply with Federal Aviation Administration (FAA) filing regulations. Upon compliance with FAA notification requirements and incorporation of FAA recommendations, construction and operation of the Alternative 9 would result in less than significant impacts with regard to airports, which would be similar to those of the Modified Project compared to the Approved Project.

Short-term construction activities associated with Alternative 9 could affect response times for emergency vehicles; however, Alternative 9 would be required to implement a Congestion Management Plan and comply with all City codes and regulations related to emergency evacuation plans. Further, Alternative 9 would not involve any other activities during the operational phase that would impede public access or travel upon the public right-of-way or would interfere with an adopted emergency response or evacuation plan. Therefore, impacts related to emergency response and evacuation plans for Alternative 9 would be less than significant and similar to those of the proposed Modified Project compared to the Approved Project.

Page 3-137, third and fourth full paragraphs, are revised as follows:

Alternative 9 would include the construction of buildings; removal of the remnant structures, parking lot, and associated electrical components; and relocation of a water main. The remnant structures are conservatively assumed to contain asbestos-containing materials, lead-based paints, and PCB-containing fixtures. The Project site was previously used for oil production, and as such, the potential exists for contaminated soil and soil gases to be encountered during construction. The construction of Alternative 9 would also involve the use of chemical agents, solvents, paints, and other hazardous materials that are associated with construction activities as the proposed Modified Project. Alternative 9 would be required to incorporate and/or comply with Project Design Features and/or Compliance Measures regarding asbestos-containing materials, lead-based paints, and/or PCBs, contaminated soils, hydrogen sulfide, methane, transport of hazardous materials, and potential alterations to previously closed oil wells. With implementation or incorporation of these measures, potentially significant impacts related to hazards and hazardous materials during construction of Alternative 9 would be less than significant. As such, Alternative 9 would have the same impacts with regard to hazards and hazardous materials during construction as the proposed Modified Project as compared to existing conditions.

Operation of Alternative 9 would involve similar use of potentially hazardous materials (e.g., solvents, cleaning agents, paints, fertilizers, pesticides) typical of office and retail uses that, when used correctly and in compliance with existing laws and regulations, would not result in significant hazards to future workers on or in the vicinity of the Project site. The Project site is located within a City-designated methane zone and would have the potential to expose future occupants to methane; therefore, Alternative 9 would ~~also~~ be required to implement Project Design Features or Compliance Measures regarding methane and hydrogen sulfide testing and abatement. With implementation of these measures, Alternative 9 would result in a less than significant operation impacts related to hazards and hazardous materials, and impacts would be similar to those of the proposed Modified Project compared to existing conditions.

Page 3-137, the following text is added after the fourth full paragraph:

Due to the proximity of the Project site to the Santa Monica Airport, Alternative 9 would be required to comply with FAA filing regulations. Upon compliance with FAA notification requirements and incorporation of FAA recommendations, construction and operation of the Alternative 9 would result in less than significant impacts with regard to airports, which would be similar to those of the Modified Project compared to existing conditions.

Short-term construction activities associated with Alternative 9 could affect response times for emergency vehicles; however, Alternative 9 would be required to implement a Congestion Management Plan and comply with all City codes and regulations related to emergency evacuation plans. Further, Alternative 9 would not involve any other activities during the operational phase that would impede public access or travel upon the public right-of-way or would interfere with an adopted emergency response or evacuation plan. Therefore, impacts related to emergency response and evacuation plans for Alternative 9 would be less than significant and similar to those of the proposed Modified Project compared to existing conditions.

Page 3-138, the following text is added after the third full paragraph:

Due to the depth to groundwater, it is not anticipated that dewatering of the regional groundwater table would be required during construction or operation of the Approved Project and the proposed Modified Project. However, perched groundwater could result in localized seepage and nuisance water within excavations at the site and may require dewatering. Any groundwater dewatering during excavation would be conducted in accordance with the Regional Board's Waste Discharge Requirements for Discharges of Groundwater from Construction, which would require testing and treatment (as necessary) of groundwater encountered during dewatering prior to release.

Page 3-138, last paragraph is revised as follows:

Alternative 9 would also require excavation and grading, increase impervious surface area, and increase runoff from the Project site. Therefore, it is anticipated that Alternative 9 would have the same impacts with regard to hydrology and water quality during construction and operation to the proposed Modified Project as compared to the Approved Project. Since Alternative 9 would have the same excavation depth and subterranean parking structure footprint as the proposed Modified Project, Alternative 9 would have the same impacts to groundwater as the proposed Modified Project as compared to the Approved Project. Since Alternative 9 would have the same building footprint as the proposed Modified Project, Alternative 9 would include the same amount of pervious area as the

proposed Modified Project. In addition, both Alternative 9 and the proposed Modified Project would retain and treat a portion of the storm water runoff from the parking structure green roof prior to release. Alternative 9 would result in the same peak flow as compared to the proposed Modified Project and thus, is concluded to have the same impacts to storm drain capacity as those of the proposed Modified Project as compared to the Approved Project. Similar to the Approved Project and proposed Modified Project, Alternative 9 would be required to comply with the applicable water quality and hydrology regulations and implement Best Management Practices to target pollutants of concern and reduce runoff from the site; therefore, impacts related to hydrology and water quality would be less than significant, and the same impacts as those of the proposed Modified Project as compared to the Approved Project.

Page 3-139, the following text is added before the last paragraph:

Due to the depth to groundwater, it is not anticipated that dewatering of the regional groundwater table would be required during construction or operation of the proposed Modified Project. However, perched groundwater could result in localized seepage and nuisance water within excavations at the site and may require dewatering. Any groundwater dewatering during excavation would be conducted in accordance with the Regional Board's Waste Discharge Requirements for Discharges of Groundwater from Construction, which would require testing and treatment (as necessary) of groundwater encountered during dewatering prior to release.

Page 3-138, last paragraph is revised as follows:

Alternative 9 would also require excavation and grading, increase impervious surface area, and increase runoff from the Project site. Therefore, it is anticipated that Alternative 9 would have the same impacts with regard to hydrology and water quality during construction and operation to the proposed Modified Project compared to existing conditions. Since Alternative 9 would have the same excavation depth and subterranean parking structure footprint as the proposed Modified Project, Alternative 9 would have the same impacts to groundwater as the proposed Modified Project compared to existing conditions. Since Alternative 9 would have the same building footprint as the proposed Modified Project, Alternative 9 would include the same amount of pervious area as the proposed Modified Project. In addition, both Alternative 9 and the proposed Modified Project would retain and treat a portion of the storm water runoff from the parking structure green roof prior to release. Alternative 9 would result in the same peak flow as compared to the proposed Modified Project and, thus, is concluded to have the same impacts to storm drain capacity as those of the proposed Modified Project as compared to existing conditions. Similar to the proposed Modified Project, Alternative 9 would be required to comply with the applicable water quality and hydrology regulations and implement Best Management Practices to target pollutants of concern and reduce runoff from the site; therefore, impacts related to hydrology and water quality would be less than significant, and the same as the impacts of the proposed Modified Project as compared to existing conditions.

Page 3-141, the following text is added before the first full paragraph:

Construction crew commutes, the transport of construction equipment and materials to the site, and hauling activities for the Approved Project and the proposed Modified Project would incrementally increase noise levels on some access roads leading to the Project site. However, the Approved Project or proposed Modified Project-related construction traffic would be a small percentage of these daily

traffic volumes and would add less than approximately 0.3 dBA to the traffic noise along the access roads, which is not discernible by the human ear. While haul trucks could result in periodic increases in single-event noise exposure, the proposed haul route would avoid many of the noise-sensitive uses that are present within the Project site vicinity. In addition, construction traffic and hauling would not occur during the noise-sensitive late evening and nighttime hours (Compliance Measure NOISE-2). Therefore, short-term construction-related impacts associated with worker commute, equipment transport to the Project site and hauling for both the Approved Project and the proposed Modified Project would be less than significant, and no mitigation measures are required. Accordingly, as compared to the Approved Project, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to noise associated with construction crew commutes and the transport of construction equipment and materials to the site.

Page 3-141, the following text is added after the second full paragraph:

Since Alternative 9 would involve the construction of a development that would include the same amount of built square footage as the proposed Modified Project, Alternative 9 would require the same number of construction crew commute trips, the same amount of construction materials, and the same amount of soil to be exported off-site as the proposed Modified Project. Therefore, with incorporation of the same Project Design Features included for the proposed Modified Project, noise for Alternative 9 associated with construction crew commutes and the transport of construction equipment and materials to and from the site would be less than significant and the same as the proposed Modified Project as compared to the Approved Project.

Page 3-150, the following text is added after the first paragraph:

Construction crew commutes, the transport of construction equipment and materials to the site, and hauling activities for the proposed Modified Project would incrementally increase noise levels on some access roads leading to the Project site. However, the proposed Modified Project-related construction traffic would be a small percentage of these daily traffic volumes and would add less than approximately 0.3 dBA to the traffic noise along the access roads, which is not discernible by the human ear. While haul trucks could result in periodic increases in single-event noise exposure, the proposed haul route would avoid many of the noise-sensitive uses that are present within the Project site vicinity. In addition, construction traffic and hauling would not occur during the noise-sensitive late evening and nighttime hours (Compliance Measure NOISE-2). Therefore, short-term construction-related impacts associated with worker commute, equipment transport to the Project site and hauling for the proposed Modified Project would be less than significant, and no mitigation measures are required. Accordingly, as compared to existing conditions, the proposed Modified Project would not result in significant environmental effects related to noise associated with construction crew commutes and the transport of construction equipment and materials to the site.

Page 3-150, the following text is added after the third paragraph:

Since Alternative 9 would involve the construction of a development that would include the same amount of built square footage as the proposed Modified Project, Alternative 9 would require the same number of construction crew commute trips, the same amount of construction materials, and the same amount of soil to be exported off-site as the proposed Modified Project. Therefore, with incorporation of the same Project Design Features included for the proposed Modified Project, noise

for Alternative 9 associated with construction crew commutes and the transport of construction equipment and materials to and from the site would be less than significant and the same as the proposed Modified Project as compared to existing conditions.

Page 3-161, first full paragraph, is revised as follows:

The Approved Project would have included 483 new housing units and, thus, would have introduced a new residential population into the area. The estimated population of the Approved Project would have been 903 residents[1] if all units were occupied. The population growth associated with the Approved Project would be consistent with the established SCAG forecast, and the Approved Project's potential impacts related to population and housing would have been less than significant. The proposed Modified Project would not cause or result in direct population or housing growth because the proposed Modified Project would not provide housing on the Project site. The proposed Modified Project would provide long-term employment for approximately 1,464 employees.[2] Given the available labor pool in the City and the region (refer to Section 4.9 of the Draft Subsequent EIR),[3] it is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need for 1,464 employees. Although the proposed Modified Project would provide more employment opportunities than the Approved Project, neither project would result in substantial indirect population growth or create a significant demand for additional housing in the Project site vicinity. In addition, this growth would not materially alter the subregional jobs-to-housing ratio forecasts, exceed employment projections, or conflict with City plans or policies related to employment growth in the area surrounding the Project site. Therefore, it was determined that the proposed Modified Project and the Approved Project would have similar, less than significant impacts related to housing, population, and employment, and that the proposed Modified Project would not have any significant new impacts beyond those of the Approved Project, nor would it increase the severity of any previously identified significant effects.

Page 161, the following paragraph is added after the first full paragraph:

There is no existing housing on the Project site; therefore, neither the Approved Project nor the proposed Modified Project would result in the displacement of existing housing. In addition, it is important to note that although the proposed Modified Project would not include the 483 residential units that would have been provided by the Approved Project, the proposed Modified Project would not result in increased impacts beyond the Approved Project by eliminating the approved-but-not-yet-constructed 483 residential units contemplated by the Approved Project because (1) the units were never constructed; (2) there is increasing availability of housing in the Project site vicinity; and (3) the number of units contemplated represented a small percentage of the projected housing increase for the subregion, City of Los Angeles, and the West Los Angeles Community Plan area.

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1 The West Los Angeles Community Plan projects that High-medium density dwelling units would have 1.87 persons per dwelling unit in 2010. Thus, 483 units x 1.87 = 903 residents.

2 Estimated employment is 1 employee/500 square feet for commercial office uses and 1 employee/ 450 square feet for retail uses.

3 Employment Development Department. 2011. Los Angeles-Long Beach-Glendale Metropolitan Division (Los Angeles County). December 2011. http://www.calmis.ca.gov/file/lfmonth/LA$pds.pdf, accessed January 20, 2012.

Page 162, second full paragraph, is revised as follows:

As previously stated, the proposed Modified Project would not cause or result in direct population or housing growth because the proposed Modified Project would not provide housing on the Project site. The proposed Modified Project would provide long-term employment for approximately 1,464 employees.[1] It is unlikely that a substantial number of employees would need to be relocated from outside the region to meet the need for 1,464 employees. Therefore, the proposed Modified Project would not result in substantial indirect population growth or create a significant demand for additional housing in the Project site vicinity. In addition, this growth would not materially alter the subregional jobs-to-housing ratio forecasts, exceed employment projections, or conflict with City plans or policies related to employment growth. Therefore, it was determined that the proposed Modified Project would have less than significant impacts related to housing, population, and employment.

Page 3-162, the following paragraph is added after the second full paragraph:

The Project site consists of disturbed land, asphalt surface parking lots, and various remnant structures. There is no existing housing on the Project site. Therefore, the proposed Modified Project would result in no impacts with respect to population and housing displacement.

Page 3-179, the following text is added after the first full paragraph:

The Applicant would be responsible for providing the necessary water infrastructure on the Project site for either the Approved Project or the proposed Modified Project. In addition, adequate pressure and fire flow capacity would be available in the water lines in the vicinity of the Project site at the time of building occupancy. Finally, LADWP has an existing Capital Improvement Program that assesses and replaces aging or insufficient infrastructure on an as-needed basis in order to ensure system integrity. Therefore, impacts related to water distribution capacity associated with operation of both the Approved Project and the proposed Modified Project are considered less than significant, and no mitigation is required. Accordingly, the proposed Modified Project would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to water distribution capacity.

Page 3-179, first full paragraph is revised as follows:

As previously identified, Alternative 9 is anticipated to result in water demand of 129,824 gallons per day (145 acre-feet per year). Water demand under Alternative 9 would be greater than the water demand of the Approved Project (18,063 more gallons per day), but less than the proposed Modified Project (1,392 fewer gallons per day). Therefore, Alternative 9 would result in a smaller magnitude of impact than that of the proposed Modified Project when compared to the Approved Project. Further, since the LADWP confirmed that the proposed Modified Project's water demand would fall within the available and projected water supplies of the 2010 Urban Water Management Plan, Alternative 9's smaller water demand would also fall within available water supplies and available water distribution capacity. In addition, LADWP has an existing Capital Improvement Program that assesses and replaces aging or insufficient infrastructure on an as-needed basis in order to ensure system integrity. A portion of the Capital Improvement Program budget is dedicated to infrastructure

[1] Estimated employment is 1 employee/500 square feet for commercial office uses and 1 employee/ 450 square feet for retail uses.

reliability projects. The Infrastructure Reliability budget is comprised mostly of work on distribution mains, major system connections, and reservoir improvements. The Approved Project, proposed Modified Project, and Alternative 9 are only responsible for providing necessary water infrastructure on the Project site and for ensuring that water supply is available to serve the Project site. Because the City is responsible for maintaining and updating any aging infrastructure, the condition of off-site infrastructure and any improvements to that infrastructure are beyond the scope of the Approved Project, the proposed Modified Project, and Alternative 9. As such, similar to the proposed Modified Project, Alternative 9 would not cause any impacts to the aging or potential deterioration of off-site infrastructure. Therefore, Alternative 9's impacts to water supplies and water distribution capacity would be less than significant, and slightly less than those of the Modified Project as compared to the Approved Project.

Page 3-179, third full paragraph is revised as follows:

According to a Water Supply Assessment prepared by the LADWP and approved by the LADWP Board, the increase in water demand attributable to the proposed Modified Project as compared to existing conditions would fall within the available and projected water supplies of the 2010 Urban Water Management Plan, and water and distribution capacity is available within the municipal system to serve the proposed Modified Project. Given that the LADWP has confirmed that it would be able to meet the proposed Modified Project's water demand, as well as the service area's existing and planned water demands, impacts associated with the long-term operation of the proposed Modified Project would be less than significant. Alternative 9 is anticipated to result in water demand of 129,824 gallons per day or 145 acre-feet per year. Alternative 9 would result in demand for 1,392 fewer gallons per day than the proposed Modified Project. Lastly, LADWP has an existing Capital Improvement Program that assesses and replaces aging or insufficient infrastructure on an as-needed basis in order to ensure system integrity. A portion of the Capital Improvement Program budget is dedicated to infrastructure reliability projects. The Infrastructure Reliability budget is comprised mostly of work on distribution mains, major system connections, and reservoir improvements. The proposed Modified Project and Alternative 9 are only responsible for providing necessary water infrastructure on the Project site and for ensuring that water supply is available to serve the Project site. Because the City is responsible for maintaining and updating any aging infrastructure, the condition of off-site infrastructure and any improvements to that infrastructure are beyond the scope of the proposed Modified Project and Alternative 9. As such, similar to the proposed Modified Project, Alternative 9 would not cause any impacts to the aging or potential deterioration of off-site infrastructure. Therefore, impacts of Alternative 9 would be less than those of the proposed Modified Project with regard to water supplies and water distribution capacity when compared to existing conditions, and would also be less than significant.

Page 3-181, second full paragraph is revised as follows:

Alternative 9 is anticipated to generate 108,154 gallons per day of wastewater. Wastewater generation under Alternative 9 would be greater than the wastewater generation of the Approved Project (13,174 more gallons per day), but less than that of the proposed Modified Project (1,077 fewer gallons per day). Therefore, with regard to wastewater treatment and conveyance, Alternative 9 would result in a smaller magnitude of impacts than that of the proposed Modified Project when compared to the Approved Project, which were determined to be less than significant. In addition, there is adequate capacity at the Hyperion Treatment Plant to accommodate the additional wastewater generated by Alternative 9 because Alternative 9 would generate less wastewater than the proposed Modified

Project. Further, similar to the proposed Modified Project, at this time it appears that existing sanitary sewer lines have sufficient capacity to transport the wastewater generated by the alternative to the Hyperion Treatment Plant. In the event that during the permitting and development process, local wastewater lines are found to contain insufficient capacity, be substandard, or in deteriorated condition, the Applicant would be required by City regulations to make necessary improvements to achieve adequate service in consultation with the Los Angeles Department of Public Works Bureau of Sanitation. As such, similar to the proposed Modified Project, Alternative 9 would not cause any impacts to the aging or potential deterioration of off-site infrastructure. Therefore, potential impacts of Alternative 9 related to wastewater conveyance and treatment would be less than significant and less than those of the proposed Modified Project as compared to the Approved Project.

Page 3-182, second paragraph is revised as follows:

Alternative 9 is anticipated to generate 108,154 gallons per day of wastewater. Therefore, Alternative 9 would result in the generation of 1,077 fewer gallons per day than the proposed Modified Project. There is adequate capacity at the Hyperion Treatment Plant to accommodate the wastewater generated by the proposed Modified Project, and because Alternative 9 would generate less wastewater than the proposed Modified Project, there is adequate capacity at the Hyperion Treatment Plant to accommodate flows from Alternative 9. In addition, as previously stated, existing sanitary sewer lines have sufficient capacity to transport the wastewater generated by Alternative 9 to the Hyperion Treatment Plant. In the event that during the permitting and development process, local wastewater lines are found to contain insufficient capacity, be substandard, or in deteriorated condition, the Applicant would be required by City regulations to make necessary improvements to achieve adequate service in consultation with the Los Angeles Department of Public Works Bureau of Sanitation. As such, similar to the proposed Modified Project, Alternative 9 would not cause any impacts to the aging or potential deterioration of off-site infrastructure. Therefore, potential impacts of Alternative 9 related to wastewater conveyance and treatment would be less than significant and less than those of the proposed Modified Project when compared to existing conditions.

Page 3-185, last paragraph is revised as follows:

Electricity. Under Alternative 9, the Project site would be developed with 710,450 square feet of office uses, a 1,300-square-foot Mobility Hub, a Transit Plaza, approximately 19,500 square feet of ancillary retail, and a partially subterranean parking structure. Alternative 9 would include the same amount of built square footage as the proposed Modified Project (731,250 square feet); however, under Alternative 9, 15,380 square feet of the Modified Project's proposed low-rise office space would be converted to ancillary retail space. As identified in Table 3.1.AG, Alternative 9 would generate demand for approximately 9,482,168 kilowatt hours of electricity per year. Although the South Coast Air Quality Management District electrical usage rates from the 1993 CEQA handbook are the standard for determining future electrical consumption for development projects, they do not include numerical reductions for implementation of Title 24 standards, which are continuously updated. It is anticipated that Alternative 9 would comply with Title 24 standards as required by the California Building Code and enforced by the City of Los Angeles. In addition, Alternative 9 would include a 20 percent reduction in energy usage (from the estimate provided by the South Coast Air Quality Management District electrical usage rates) because the building would incorporate energy conservation measures to exceed the requirements of Title 24 (2005) and City of Los Angeles codes in effect at the time of circulation of the Draft Subsequent EIR by 20 percent (Project Design Feature NRG-1). Compliance with Title 24 ensures that inefficient, wasteful, and unnecessary consumption of

energy would not occur. With inclusion of Project Design Feature NRG-1, Alternative 9 is projected to demand 7,585,734 kilowatt hours per year of electricity.

Page 3-186, last paragraph is revised as follows:

The LADWP had an estimated net energy load of 26,472 million kilowatt hours 26,472,000 megawatt hours or 26,472 gigawatt hours in 2010).[1] The LADWP's projected annual net energy load for 2015, the proposed Modified Project's build-out year, is approximately 27,761 million kilowatt hours (27,761,000 megawatt hours or 27,761 gigawatt hours).[2] The LADWP forecast growth in electricity net energy load (2010–2015) is 1,289 million kilowatt-hours per year. In addition, according to the 2010 Final Power Integrated Resources Plan, the Los Angeles Department of Water and Power has the capability of generating 7,977 megawatts[3] and often has a surplus of generating capacity and energy.[4] The electricity demand associated with Alternative 9 would represent 0.73 percent of the LADWP's forecast growth in annual net energy load by 2015. Therefore, the increase in power demand associated with implementation of Alternative 9 is anticipated to be within the service capabilities of the LADWP and would not result in the need for new electricity supplies or adversely impact the LADWP's renewable energy resource supplies. LADWP undertakes expansion and/or modification of electricity distribution infrastructure and systems to serve future growth in the City of Los Angeles as required in the normal process of providing electrical service. LADWP maintains a Power Reliability Program specifically intended to: (1) mitigate problem circuits and stations based on the types of outages specific to the facility, (2) implement proactive maintenance and capital improvements that take into account system load growth and the inspections and routine maintenance that must take place to identify problems before they occur, and (3) establish replacement cycles for facilities that are in alignment with the equipment's life cycle. Specific routine capital improvements include pole replacement, cable replacement, transformer upgrades and/or replacement, and construction of new lines and stations to support growth. Because the power demand of Alternative 9 would be within the LADWP service capabilities, and improvements to off-site infrastructure are beyond the scope of the Alternative 9, no new electrical supply facilities and distribution infrastructure or expansion of existing facilities would be required beyond those that are part of LADWP's regular maintenance and capital improvement program. Impacts would be less than significant.

Page 3-187, second and third paragraphs are revised as follows:

The Approved Project is anticipated to use an estimated 2,826,000 kilowatt hours per year. The proposed Modified Project is anticipated to use an estimated 9,472,940 kilowatt hours per year, which is a net increase of 6,646,940 kilowatt hours per year or 18,211 kilowatt hours per day when compared to the Approved Project due to the change from a residential development to a commercial

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1 The California Energy Commission. Energy Consumption Data Management System. Electricity Consumption by Entity, the LADWP. http://www.ecdms.energy.ca.gov/elecbyutil.aspx. Accessed September 21, 2011.

2 LADWP. 2010 Final Power Integrated Resources Plan. December 15, 2010. Table A-1.

3 "Capacity" and "Energy" are electric utility terms that distinguish between how much power the system is capable of generating at a given instant in time (capacity; in megawatts) and how much power the system generates over a given period of time (energy; in megawatt-hours). Capacity numbers are expressed in megawatts, and energy numbers are expressed in megawatt hours. LADWP. 2010 Final Power Integrated Resources Plan. December 15, 2010. Table 2-5.

4 LADWP sells a portion of this surplus into wholesale electricity markets within the Western Electricity Coordinating Council. LADWP. 2010 Final Power Integrated Resources Plan. December 15, 2010. Page 2-30.

office development, which uses more electricity. The proposed Modified Project's net increase in electricity demand compared to the electricity demand of the Approved Project (18,211 kilowatt hours [18.2 megawatt hours] per day, or 6,646,940 kilowatt hours [6,647 megawatt hours] per year) represents 0.52 percent of the LADWP's forecast growth in annual net energy load by 2015. The net increase in power demand associated with the proposed Modified Project as compared to the Approved Project is anticipated to be within the service capabilities of the LADWP and would not result in the need for new electricity supplies or adversely impact the LADWP's renewable energy resource supplies. Because the power demand of the Approved Project and proposed Modified Project would be within the LADWP service capabilities, and improvements to off-site infrastructure are beyond the scope of the Approved Project and proposed Modified Project, no new electrical supply facilities and distribution infrastructure or expansion of existing facilities would be required beyond those that are part of LADWP's regular maintenance and capital improvement program. The proposed Modified Project would also include energy conservation Project Design Features beyond State and City conservation standards that may allow the proposed Modified Project to obtain Leadership in Energy and Environmental Design Platinum certification or equivalent green building standards. Specifically, the proposed Modified Project is committed to a 20 percent reduction in electricity consumption beyond the requirements of Title 24 and related City standards as set forth in Project Design Feature NRG-1. With inclusion of Project Design Feature NRG-1, the proposed Modified Project is projected to demand 7,578,352 kilowatt hours per year of electricity. Therefore, the increase in electricity demand required for the proposed Modified Project when compared to the Approved Project would be less than significant. Accordingly, the proposed Modified Project would not have any significant new impacts, nor would it increase the severity of any previously identified significant effects related to energy use.

Alternative 9 would generate demand for 9,482,168 kilowatt hours per year, which is 10,380 kilowatt hours per year more than the estimated electrical demand for the proposed Modified Project. Like the proposed Modified Project, Alternative 9 would be committed to a 20 percent reduction in electricity consumption beyond the requirements of Title 24 and related City standards as set forth in Project Design Feature NRG-1. With inclusion of Project Design Feature NRG-1, Alternative 9 is projected to demand 7,585,734 kilowatt hours per year of electricity which is 7,382 kilowatt hours more than the proposed Modified Project. Similar to the proposed Modified Project, the increase in power demand associated with implementation of Alternative 9 is anticipated to be within the service capabilities of LADWP and would not result in the need for new electricity supplies or adversely impact LADWP's renewable energy resource supplies. Because the power demand of Alternative 9 would be within the LADWP service capabilities, and improvements to off-site infrastructure are beyond the scope of Alternative 9, no new electrical supply facilities and distribution infrastructure or expansion of existing facilities would be required beyond those that are part of LADWP's regular maintenance and capital improvement program. However, Alternative 9 would demand more electricity than the Approved Project and the proposed Modified Project. Therefore, impacts of Alternative 9 would be slightly greater than those of the proposed Modified Project compared to the Approved Project, but would also be less than significant.

Page 3-188, second and third paragraphs are revised as follows:

The net electricity use increase of the proposed Modified Project when compared to existing conditions is 9,459,740 kilowatt hours (9,460 megawatt hours) per year. This increase represents 0.73 percent of the LADWP's forecast growth in annual electricity supply by 2015. The LADWP's forecasted electricity demand assumes construction of new projects within its service area, such as the

proposed Modified Project. In addition, according to the 2010 Final Power Integrated Resources Plan, the LADWP has the capability of generating 7,977 megawatts and often has a surplus of generating capacity and energy. Therefore, the net increase in power demand associated with the proposed Modified Project is anticipated to be within the service capabilities of the LADWP and would not result in the need for new electricity supplies. Because the power demand of the proposed Modified Project would be within the LADWP service capabilities, and improvements to off-site infrastructure are beyond the scope of the proposed Modified Project, no new electrical supply facilities and distribution infrastructure or expansion of existing facilities would be required beyond those that are part of LADWP's regular maintenance and capital improvement program. The proposed Modified Project would also include energy conservation Project Design Features beyond State and City conservation standards that may allow the proposed Modified Project to obtain Leadership in Energy and Environmental Design Platinum certification (or equivalent green building standards), which would reduce the proposed Modified Project's potential energy demand. Specifically, the proposed Modified Project is committed to a 20 percent reduction in electricity consumption beyond the requirements of Title 24 and related City standards as set forth in Project Design Feature NRG-1. With inclusion of Project Design Feature NRG-1, the proposed Modified Project is projected to demand 7,578,352 kilowatt hours per year of electricity. Accordingly, it was determined that potential impacts related to energy use would be less than significant for the proposed Modified Project compared to existing conditions.

Alternative 9 would generate demand for 9,482,168 kilowatt hours per year, which is 10,380 kilowatt hours per year more than the estimated electrical demand for the proposed Modified Project. Like the proposed Modified Project, Alternative 9 would be committed to a 20 percent reduction in electricity consumption beyond the requirements of Title 24 and related City standards as set forth in Project Design Feature NRG-1. With inclusion of Project Design Feature NRG-1, Alternative 9 is projected to demand 7,585,734 kilowatt hours per year of electricity which is 7,382 kilowatt hours more than the proposed Modified Project. Similar to the proposed Modified Project, the increase in power demand associated with implementation of Alternative 9 is anticipated to be within the service capabilities of the LADWP and would not result in the need for new electricity supplies or adversely impact the LADWP's renewable energy resource supplies. Because the power demand of the Alternative 9 would be within the LADWP service capabilities, and improvements to off-site infrastructure are beyond the scope of Alternative 9, no new electrical supply facilities and distribution infrastructure or expansion of existing facilities would be required beyond those that are part of LADWP's regular maintenance and capital improvement program. Impacts therefore would be less than significant. However, since Alternative 9 would generate more demand for electricity than the proposed Modified Project, impacts of Alternative 9 would be slightly greater than those of the proposed Modified Project compared to existing conditions.

Page 3-189, last paragraph is revised as follows:

As identified in Table 3.1.AH, Alternative 9 would generate demand for approximately 1,481 thousand cubic feet of natural gas per day or 49.37 thousand cubic feet per month. Based on the projected 2015 annual demand of natural gas within the entire Southern California Gas Company service area of 957,760 million cubic feet per year, Alternative 9 would consume approximately 0.0019 percent of the total annual natural gas demand of Southern California Gas Company. The net increase in natural gas usage attributable to Alternative 9 over existing conditions represents a negligible increase in the total daily natural gas demand of Southern California Gas Company. This is a conservative estimate in that it does not take into account the energy-efficient Project Design

Features that would reduce Alternative 9's demand for energy in comparison with more conventional design and construction techniques. This estimate also does not take into account the fact that according to Southern California Gas Company, annual demand for natural gas is expected to decrease until at least 2030.[1] In addition, Alternative 9 would comply with Title 24 which ensures that inefficient, wasteful, and unnecessary consumption of energy would not occur. Consequently, Alternative 9 would be within the service capabilities and natural gas distribution line capacity of the Southern California Gas Company and would not require the need for new natural gas supplies or distribution lines. Therefore, Alternative 9 would result in a less than significant impact with regard to natural gas supplies.

Page 3-190, last paragraph is revised as follows:

Alternative 9 would generate demand for 49.37 thousand cubic feet of natural gas per day, or 18.0 million cubic feet annually. Natural gas consumption by the proposed Modified Project is estimated to be approximately 48.25 thousand cubic feet of natural gas per day, or 17.6 million cubic feet per year. As such, the Approved Project would consume 44 percent more natural gas than the proposed Modified Project, while Alternative 9 would consume 2 percent more natural gas than the proposed Modified Project. Therefore, Alternative 9 would demand slightly more natural gas than the proposed Modified Project as compared to the Approved Project. However, because Alternative 9's gas consumption would be approximately 58 percent of the Approved Project's consumption, which was determined to be within the service supply capabilities and natural gas distribution line capacity of the Southern California Gas Company, Alternative 9's impacts related to natural gas consumption also would be less than significant.

Page 3-191, last full paragraph is revised as follows:

Alternative 9 would generate demand for 49.37 thousand cubic feet of natural gas per day, or 18.0 million cubic feet annually. Natural gas consumption by the proposed Modified Project is estimated to be approximately 48.25 thousand cubic feet of natural gas per day, or 17.6 million cubic feet per year. As such, Alternative 9 would consume 2 percent more natural gas than the proposed Modified Project. Therefore, Alternative 9 would demand slightly more natural gas than the proposed Modified Project as compared to existing conditions.~~; however, as described above,~~ However, because the gas consumption would be within the service supply capabilities and natural gas distribution line capacity of the Southern California Gas Company, Alternative 9 would result in a less than significant impact related to natural gas consumption.

[1] California Gas and Electric Utilities. 2010 California Gas Report http://www.socalgas.com/regulatory/cgr.shtml, last accessed, September 26, 2011.

3.0 ADDITIONAL INFORMATION

3.1 TRAFFIC AND CIRCULATION

Gibson Transportation Consulting, Inc. prepared a supplemental analysis of potential traffic and circulation impacts involving the existing alleyway that is adjacent to the Project site (located to the east), based on comments and requests made during the Project's public hearing process. (See Appendix AQ of the Subsequent EIR.)

The Los Angeles Department of Transportation (LADOT) does not require that unsignalized intersections be analyzed for potential impacts. Rather, according to *Traffic Study Policies and Procedures* (LADOT, August 2014), unsignalized intersections that are adjacent to a project or are integral to a project's site access and circulation plan should be identified. For these intersections, vehicular delay should be estimated using the *Highway Capacity Manual* (Transportation Research Board, 2010) (HCM) methodology. If any unsignalized intersection is projected to operate at level of service (LOS) E or F under Future with Project conditions, then the intersection should be evaluated for the need to install a traffic signal by conducting a signal warrant analysis.

While LADOT provides no impact thresholds for unsignalized intersections, there are analysis criteria and impact thresholds identified in the Los Angeles CEQA Thresholds Guide (City of Los Angeles, 2006). Similar to the LADOT guidelines, the Los Angeles CEQA Thresholds Guide requires that average vehicular delay be assessed using the HCM methodology to determine LOS. If any intersection is found to operate at LOS C, D, E, or F, then additional analysis is conducted using the Critical Movement Analysis (CMA) methodology that LADOT prescribes for the analysis of signalized intersections, with a reduced intersection capacity of 1,200 vehicles per hour per lane to simulate stop-controlled conditions. The results of the CMA analysis are used to identify potential significant impacts using the same sliding scale that is used for signalized intersections according to LADOT criteria. In this scale, a project's maximum allowable increase in volume-to-capacity (V/C) ratio at an intersection decreases as the LOS worsens. For an intersection operating at LOS C under Future with Project conditions, a significant impact is identified if the V/C ratio increases by 0.040 or more. For intersections operating at LOS D under Future with Project conditions, a significant impact is identified if the V/C ratio increases by 0.020 or more. For intersections operating at LOS E or F under Future with Project conditions, a significant impact is identified if the V/C ratio increases by 0.010 or more. There are no applicable requirements or thresholds to analyze queuing or queue lengths on alleyways.

The supplemental analysis was conducted of the unsignalized intersection of the alleyway forming the eastern border of the Project site and Constellation Boulevard. Afternoon peak-hour traffic counts were conducted at this intersection in September 2013 and were used for this analysis (see Attachment in Appendix AQ). Because the alley provides access to several office buildings and would provide access to the Century City Center project (primarily an office building), traffic at this intersection is heavily skewed toward morning arrivals into the alley and afternoon departures out of the alley. Because turns from higher-volume, uncontrolled Constellation Boulevard to the low-volume alley are not substantially delayed while stop-controlled turns from the alley onto higher-volume Constellation Boulevard may experience delay, the afternoon peak hour represents the worst-case operating condition for this intersection, and it is unnecessary to conduct analysis of the morning peak hour.

It is important to note that the supplemental analysis conservatively uses worst-case vehicular delay to estimate LOS, though the Los Angeles CEQA Thresholds Guide specifies that the less-conservative average vehicular delay may be used to assess LOS for all unsignalized intersections. At 2-way stop-controlled intersections such as the intersection of the alley and Constellation Boulevard, the worst-case delay is experienced by vehicles attempting to turn from the alley onto Constellation Boulevard. On the other hand, the average delay is weighted heavily by the larger number of vehicles travelling east and west on Constellation Boulevard, which experience no delay at all. Accordingly, by using the worst-case vehicular delay to estimate LOS, the supplemental analysis provided in Appendix AQ of the Subsequent EIR provides a more conservative analysis than could have been provided under the Los Angeles CEQA Thresholds Guide.

The supplemental analysis was conducted for years 2011, 2015, and 2021 for Alternative 9 (the Enhanced Retail Alternative), which was adopted by the City Planning Commission at its June 12, 2014, hearing. The analysis was conducted under "no Project" conditions and "with Project" conditions considering trip generation using the Empirical Rate, the Economy Adjustment Rate, and the Published Rates for Alternative 9 as provided in Section 3.1.1 of the Final Subsequent EIR. Further, for all "with Project" conditions, two possible Project access configurations were examined. In the first configuration, as shown in Figure 1 in Appendix AQ, the primary Project driveway on Constellation Boulevard (west of the alley) would operate as a full-access, signalized driveway allowing left and right-turns into and out of the Project site (Full Access Driveway). In the second configuration, as shown in Figure 2 in Appendix AQ, the primary Project driveway would be restricted to right-turns in and out only via a physical median on Constellation Boulevard, which would serve to restrict left-turns to and from the Project driveway while maintaining full access to 2000 Avenue of the Stars on the south side of Constellation Boulevard (RIRO Driveway). These are the two configurations proposed in the Subsequent EIR to mitigate a potential traffic and circulation impact at the intersection of Constellation Boulevard and the driveways of the Project and 2000 Avenue of the Stars. (See Draft Subsequent EIR, pp. 4.2-101 through 4.2-103 for discussion of the Full Access Driveway, and Final Subsequent EIR Topical Response 6 for discussion of the RIRO Driveway.)

As detailed above, both the LADOT analysis for potential signalization of unsignalized intersections and the Los Angeles CEQA Thresholds Guide analysis for potential significant traffic impacts begin with an HCM analysis to calculate delay at the subject intersection. The HCM analysis was conducted for each of the scenarios described above, and is summarized in Table 1 in Appendix AQ. As shown in Table 1 in Appendix AQ, under conditions without the Project, the intersection would operate at LOS B in years 2011, 2015, and 2021. With Alternative 9 in place, it would continue to operate at LOS B using the trip generation under the Empirical Rate or Economy Adjustment Rate in year 2011 with the Full Access Driveway configuration. In all other analysis years and trip generation scenarios, as well as all scenarios involving the RIRO Driveway, the intersection would operate at LOS C with Alternative 9. It should be noted that if the LOS were based on less conservative average delay (see discussion above), the intersection would operate at LOS A, using each trip generation rate and under each analysis year.

Based on the results, the worst-case operating LOS with Alternative 9 in place is projected to be LOS C. Based on LADOT guidelines, an unsignalized intersection should be further analyzed using signal warrants in the event that an unsignalized intersection is projected to operate at LOS E or F based on the HCM methodology. Because the intersection is projected to operate at LOS C, no further analysis is required to determine the need for signalization based on LADOT guidelines. The intersection does not require signalization pursuant to LADOT criteria.

The Los Angeles CEQA Thresholds Guide bases the need for further analysis of an unsignalized intersection on whether or not that intersection is projected to operate at LOS C, D, E, or F under Future with Project conditions *based on the peak hour average vehicular delay through the intersection.* Table 1

in Appendix AQ reports LOS based on the worst-case delay, a significantly more conservative metric, as discussed above. Nonetheless, based on that conservative metric the intersection would operate at LOS C, which would require additional analysis of the intersection using the CMA methodology and applying LADOT's signalized intersection significant impact thresholds.

Table 2 in Appendix AQ summarizes the results of the intersection analysis using the CMA methodology with a reduced capacity of 1,200 vehicles per hour per lane to simulate stop-controlled conditions. As Table 2 in Appendix AQ shows, based on the CMA methodology, the intersection would operate at LOS A under all analysis scenarios: both the Full Access Driveway and RIRO Driveway configurations, and each of the three trip generation rates, and under each analysis year. As described above, based on LADOT significant impact criteria, a project would not result in a significant intersection impact under the CMA methodology unless it operated at LOS C at a minimum. Because the intersection would operate at LOS A under the CMA methodology in the worst-case scenario with the addition of Alternative 9 traffic, no significant traffic impact would occur. Therefore, the results of this supplemental analysis do not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

3.2 AIR QUALITY MODELING – OPERATIONS (CALEEMOD 2013.2.2)

As discussed in Section 4.4 of the Draft Subsequent EIR, CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects. The model quantifies direct emissions from construction and operations (including vehicle use), as well as indirect emissions, such as GHG emissions from energy use, solid waste disposal, vegetation planting and/or removal, and water use. The mobile source emission factors used in the model (EMFAC2011) include the Assembly Bill 1493 (Pavley) standards and the Low Carbon Fuel Standard. Assembly Bill 1493 required the California Air Resources Board (CARB) to set GHG emission standards for passenger vehicles and light-duty trucks. The Low Carbon Fuel Standard requires producers of petroleum-based fuels to reduce the carbon intensity of their products, beginning with a quarter of a percent in 2011 and culminating in a 10 percent total reduction in 2020. Further, the model identifies mitigation measures to reduce criteria pollutant and GHG emissions in addition to calculating the benefits achieved from measures chosen by the user. The model calculates the emission reduction benefits from implementing the same GHG mitigation measures identified and adopted by the California Air Pollution Control Officers Association (CAPCOA).

The model is a tool for quantifying air quality emissions from land use projects throughout California. The model can be used for a variety of situations for which an air quality analysis is necessary or desirable, such as California Environmental Quality Act (CEQA) documents, National Environmental Policy Act (NEPA) documents, pre-project planning, and compliance with local air quality rules and regulations, etc.

The model was developed in collaboration with the air districts and metropolitan planning organizations of California. Default data (e.g., emission factors, trip lengths, meteorology, and source inventory, etc.) specific to a region have been provided by the various California air districts to account for local requirements and conditions.

At the time the Draft Subsequent EIR was prepared and released for public review (March 2013), CalEEMod 2011.1.1 was the most current land use emissions computer model available, and was therefore the appropriate model used for calculation of the air pollutant and GHG emissions associated

with development of the proposed Modified Project. CalEEMod 2013.2 and CalEEMod 2013.2.1 were released in July and September 2013 respectively, and CalEEMod 2013.2.2 was released in October 2013. According to the South Coast Air Quality Management District (SCAQMD), major revisions and updates to CalEEMod 2013.2.2 compared to the 2011.1.1 version include the following:

- New AP-42 emission factors for paved roads, California Air Resources Board (CARB) EMFAC2011 and off-road inventory added
- Different default trip lengths for the same geographical area corrected
- New water and solid waste defaults for industrial land uses
- Ability to quantify emissions from off-road equipment during operation
- Ability to quantify energy use from elevators/lighting/ventilation for parking land uses
- Latest carbon intensity value of utilities added
- Volatile organic compounds (VOC) calculation from parking lot painting modified
- Wastewater treatment methodology modified

To provide additional information for decision-makers and the public, emissions associated with development of Alternative 9 were recalculated using CalEEMod 2013.2.2. As part of this effort, Gibson Transportation Consulting, Inc. conducted an analysis of the commercial-work (C-W) trip length for the proposed Project, which is included in Appendix AM of the Subsequent EIR. By analyzing zip code data that was obtained from the Century City Chamber of Commerce, the analysis determined that the average C-W trip length in the project area is 12.7 miles. This distance is lower than the default C-W trip length included in CalEEMod 2013.2.2. Table 3.A summarizes the results of the C-W trip length analysis provided by Gibson Transportation Consulting, Inc.

Table 3.A: Commercial-Work (C-W) Trip Length Analysis

Radius (miles)	# of Employees	Percentage	Maximum Distance	Total Miles Driven
0 - 2	432	9.4%	2	864
2 - 5	1,390	30.3%	5	6,950
5 - 10	1,142	24.9%	10	11,420
10 - 15	644	14.0%	15	9,660
15 - 20	383	8.3%	20	7,660
20 - 25	251	5.5%	25	6,275
25 - 40	275	6.0%	40	11,000
40 - 60	73	1.6%	60	4,380
Total	**4,590**			**58,209**
Overall Average Distance				**12.7**

Source: Gibson Transportation Consulting, Inc. (September 2014).

Tables 3.B through 3.G list the operational emissions for Alternative 9 for 2015 and 2021 using the three different vehicle trip rates utilized in the air quality analysis in the Subsequent EIR (Empirical Rate, Economy Adjustment Rate, and Published Rates)[1] using the CalEEMod 2013.2.2 model and the 12.7-mile C-W trip length. Note that for Tables 3.B through 3.G and all analyses in the Subsequent EIR, the CalEEMod modeling does not include the 93,040 square foot green roof, which consists of open and planted space on the roof of the parking structure, for both the proposed Modified Project and Alternative 9. This proposed green roof would minimize the development's impact on the surrounding city and ecosystem by trapping small amounts of particulate emissions and by reducing the Project's energy demand, which would reduce the emissions associated with production of that energy. It would blanket the roof of the parking garage, providing a significant decrease in the urban heat island effect of the site by decreasing the absorption of heat into the built fabric of the city. The roof would also capture stormwater for reuse on site or allow for it to be detained and filtered prior to release into the City of Los Angeles' stormwater system. While the benefits of this green roof are clear, there is no mechanism to include this land use in the CalEEMod modeling. Since the inclusion of a green roof reduces the environmental impacts, not including it in the CalEEMod modeling produces a conservative analysis of the Project's emissions.

Table 3.B: Alternative 9 Empirical Rate 2015 Operational Emissions

Category	Pollutant Emissions (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	21	0.0024	0.24	0.000020	0.00088	0.00088
Energy	0.19	1.7	1.4	0.010	0.13	0.13
Mobile	13	36	140	0.30	21	5.8
Total Project Emissions	**34**	**38**	**140**	**0.31**	**21**	**5.9**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA Associates, Inc. (May 2014).
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides

Table 3.C: Alternative 9 Economy Adjustment Rate 2015 Operational Emissions

Category	Pollutant Emissions (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	21	0.0024	0.24	0.000020	0.00088	0.00088
Energy	0.19	1.7	1.4	0.010	0.13	0.13
Mobile	14	38	150	0.32	22	6.2
Total Project Emissions	**35**	**40**	**150**	**0.33**	**22**	**6.3**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA Associates, Inc. (May 2014).
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides

[1] See Draft Subsequent EIR, Chap. 4.4 (proposed Modified Project); Final Subsequent EIR, Sec. 3.1.1 (Alternative 9).

Table 3.D: Alternative 9 Published Rates 2015 Operational Emissions

Category	Pollutant Emissions (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	21	0.0024	0.24	0.000020	0.00088	0.00088
Energy	0.19	1.7	1.4	0.010	0.13	0.13
Mobile	18	49	190	0.41	28	7.9
Total Project Emissions	**39**	**51**	**190**	**0.42**	**28**	**8.0**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA Associates, Inc. (May 2014).
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides
PM_{10} = particulate matter less than 10 microns in size

Table 3.E: Alternative 9 Empirical Rate 2021 Operational Emissions

Category	Pollutant Emissions (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	21	0.0022	0.24	0.000020	0.00085	0.00085
Energy	0.19	1.7	1.4	0.010	0.13	0.13
Mobile	9.1	22	94	0.30	20	5.7
Total Project Emissions	**30**	**24**	**96**	**0.31**	**20**	**5.8**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA Associates, Inc. (May 2014).
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides

Table 3.F: Alternative 9 Economy Adjustment Rate 2021 Operational Emissions

Category	Pollutant Emissions (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	21	0.0022	0.24	0.000020	0.00085	0.00085
Energy	0.19	1.7	1.4	0.010	0.13	0.13
Mobile	9.7	24	99	0.32	22	6.1
Total Project Emissions	**31**	**26**	**100**	**0.33**	**22**	**6.2**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA Associates, Inc. (May 2014).
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides

Table 3.G: Alternative 9 Published Rates 2021 Operational Emissions

Category	Pollutant Emissions (lbs/day)					
	ROG	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area	21	0.0022	0.24	0.000020	0.00085	0.00085
Energy	0.19	1.7	1.4	0.010	0.13	0.13
Mobile	12	30	130	0.41	28	7.8
Total Project Emissions	**33**	**32**	**130**	**0.42**	**28**	**7.9**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Significant?	**No**	**No**	**No**	**No**	**No**	**No**

Source: LSA Associates, Inc. (May 2014).
Note: These emissions do not include the benefits of the planned 93,040 square foot green roof on the parking structure.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
ROG = reactive organic gases
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides
PM_{10} = particulate matter less than 10 microns in size

A summary of CalEEMod input files is included in Appendix AN of the Subsequent EIR. As shown, similar to the analysis performed with CalEEMod 2011.1.1 in the Subsequent EIR, the long-term operational mobile source air quality impacts of Alternative 9 calculated by CalEEMod 2013.2.2 would be less than significant, and no mitigation would be required. In addition, as compared to the proposed Modified Project (see Sections 4.4.7-4.4.8 in the Draft Subsequent EIR), Alternative 9 would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to air quality.

Therefore, the results of this supplemental analysis do not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

3.3 AIR QUALITY MODELING – CONSTRUCTION (CALEEMOD 2013.2.2)

As discussed in Response to Comment O-27B-19 in the Final Subsequent EIR, a known error in the 2011.1.1 version of CalEEMod model used to analyze construction emissions in the Draft Subsequent EIR overstated offsite construction truck hauling emissions, which required correction in order to accurately provide expected construction emissions to decisionmakers and the public. The error in the 2011.1.1 version of CalEEMod model was therefore corrected in the analysis provided in the Subsequent EIR using the methodology to correct the error published at the time. (See Response to Comment O-27B-19 for additional discussion.)

Following the release of the Final Subsequent EIR, certain commenters claimed without evidentiary support that the error in the 2011.1.1 version of CalEEMod applies only to haul truck fugitive dust emissions and does not affect other pollutants (ROC, NO_X, CO, SO_X, exhaust PM_{10} and $PM_{2.5}$). As discussed in a December 6, 2013 memorandum prepared by LSA Associates, Inc. and provided to the City Planning Department's Hearing Officer, in the Draft Subsequent EIR LSA corrected the error in the 2011.1.1 version of CalEEMod based on information obtained directly from the South Coast Air Quality Management District. Specifically, Michael A. Krause, Program Supervisor at the South Coast Air Quality Management District, informed LSA in 2012 that the error in the 2011.1.1 version of CalEEMod related to offsite haul truck emissions applies to all pollutants. Accordingly, the correction to the 2011.1.1 version of CalEEMod for offsite haul truck emissions was applied to all pollutants, including fugitive dust emissions ROC, NO_X, CO, SO_X, exhaust PM_{10} and $PM_{2.5}$.

Nevertheless, in order to address the claim that the error in the 2011.1.1 version of CalEEMod applies only to haul truck fugitive dust emissions, a supplemental analysis was undertaken using the CalEEMod 2013.2.2 model. As discussed in Section 3.2 above, the 2013.2.2 model contains corrections within the model for certain known errors in the 2011.1.1 model, including the error related to construction truck hauling emissions. Therefore, the correction applied to the 2011.1.1 model in the Draft Subsequent EIR (see Sections 4.4.7-4.4.8 in the Draft Subsequent EIR) was not required in this supplemental analysis.

In the course of conducting this supplemental analysis and examining the construction modeling details, it was discovered that the construction haul distance was incorrectly entered in the CalEEMod modeling in the Draft Subsequent EIR (Section 4.4.7, page 4.4-30) as haul trips of 50 miles in length, rather than 23 miles that are planned. The 23-mile distance is based on the proposed haul truck routes from the Project site in Century City to the disposal site in Sylmar. In the Draft Subsequent EIR (Section 4.4.7, page 4.4-29), the CalEEMod modeling was run based on 125 round trips of 50 miles each, rather than the 125 one-way trips of 23 miles each that are planned. As a result, the Subsequent EIR provides an overly conservative, overestimate of construction haul emissions. To correct this overestimate, the supplemental analysis using the CalEEMod 2013.2.2 model used the more accurate 125 one-way trips of 23 miles each that are planned.

The supplemental analysis described above is provided below in Table 3.H, correcting Table 4.4.AI in the Draft Subsequent EIR. Specifically, Table 3.H lists the construction emissions for the proposed Modified Project and Alternative 9 (since Alternative 9 is only approximately 1,421 square feet smaller than the Modified Project, their construction emissions are anticipated to be substantially identical) with the implementation of mitigation described in the Subsequent EIR[2] using the CalEEMod 2013.2.2 model and the appropriate haul distance of 23 miles each way (see Appendix AN of the Subsequent EIR for the summary of the CalEEMod modeling input files). As shown in Table 3.H, with incorporation of these changes, construction of either the proposed Modified Project or Alternative 9 would result in a less than significant impact for total construction emissions with incorporation of the previously identified mitigation for all analyzed pollutants, including ROC and NO_X.

Table 3.H: Short-Term Regional Construction Emissions – Proposed Modified Project and Alternative 9 – with Mitigation

	Total Regional Pollutant Emissions, lbs/day							
Construction Phase	**ROC**	**NO_X**	**CO**	**SO_X**	**Fugitive PM_{10}**	**Exhaust PM_{10}**	**Fugitive $PM_{2.5}$**	**Exhaust $PM_{2.5}$**
Demolition	3.5	36	52	0.078	0.19	1.6	0.047	1.5
Grading	6.5	82	78	0.15	4.9	2.8	1.9	2.6
Building Construction	10	55	150	0.26	7.0	2.2	1.9	2.1
Architectural Coating	43	0.84	9.8	0.017	1.1	0.014	0.30	0.014
Peak Daily Emissions[1]	**53**	**82**	**160**	**0.28**	**10**		**4.5**	
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**		**55**	
Significant Emissions?	**No**	**No**	**No**	**No**	**No**		**No**	

Source: LSA Associates, Inc., October 2014.
[1] The Building Construction and Architectural Coating phases are expected to overlap.
CO = carbon monoxide
lbs/day = pounds per day
NO_x = nitrogen oxides
$PM_{2.5}$ = particulate matter less than 2.5 microns in size
PM_{10} = particulate matter less than 10 microns in size
ROC = reactive organic compounds
SCAQMD = South Coast Air Quality Management District
SO_x = sulfur oxides

As discussed in Chapter 4.4 of the Draft Subsequent EIR for the Modified Project, in Section 3.1.1 of the Final Subsequent for Alternative 9, and in Response to Comment O-27B-19 in the Final Subsequent EIR,

[2] Mitigation Measures 4.4.1 and 4.4.2 in Section 4.4 of the Draft Subsequent EIR.

using the model for the 2011.1.1 version of CalEEMod following the incorporation of mitigation, the Modified Project and Alternative 9 would result in a less than significant impact for total construction emissions. As demonstrated above, using the model for CalEEMod 2013.2.2 with the changes described, the Modified Project and Alternative 9 would continue to result in a less than significant impact for total construction emissions, including impacts related to ROC and NO_X. Therefore, the results of this supplemental analysis do not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

3.4 CLIMATE CHANGE - BUSINESS AS USUAL ANALYSES

To provide additional information for decision-makers and the public, the CalEEMod 2013.2.2 model also was used to determine the GHG emissions from the Approved Project, the proposed Modified Project and Alternative 9. As discussed above in Section 3.2, CalEEMod 2013.2.2 was released in October 2013 and contains updates and revisions to the model from the 2011.1.1 version used in the Draft Subsequent EIR. Consistent with the original analytical methodology used in the Draft Subsequent EIR (see Chapter 4.5 of the Draft Subsequent EIR), the "business-as-usual" (BAU) analysis for GHGs was conducted by comparing the CalEEMod analyses for the Approved Project, the proposed Modified Project and Alternative 9 scenarios to a Project if no action were taken to improve environmental practices and reduce GHG emissions. An adjustment factor was developed based on review of the AB 32 Scoping Plan data related to efficiency changes, and was applied to the area, energy, mobile, waste and water emissions source outputs of the CalEEMod modeling. This modeling also includes the commercial-work (C-W) trip length of 12.7 miles confirmed by Gibson Transportation Consulting, Inc. (see Appendix AM of the Subsequent EIR), as well as the proper 23 mile construction haul trip length. Note that for Tables 3.I through 3.L and all analyses in the Subsequent EIR, the CalEEMod modeling does not include the 93,040 square foot green roof, which consists of open and planted space on the roof of the parking structure, for both the proposed Modified Project and Alternative 9. This proposed green roof would minimize the development's impact on the surrounding city and ecosystem by trapping small amounts of particulate emissions and by reducing the Project's energy demand, which would reduce the emissions associated with production of that energy. It would blanket the roof of the parking garage, providing a significant decrease in the urban heat island effect of the site by decreasing the absorption of heat into the built fabric of the city. The roof would also capture stormwater for reuse on site or allow for it to be detained and filtered prior to release into the City of Los Angeles' stormwater system. While the benefits of this green roof are clear, there is no mechanism to include this land use in the CalEEMod modeling. Since the inclusion of a green roof reduces the environmental impacts, not including it in the CalEEMod modeling produces a conservative analysis of the Project's greenhouse gas emissions.

Table 3.I lists the operational GHG emissions for the Approved Project, the proposed Modified Project and Alternative 9 for 2021 using only the Published Rates vehicle trip rates and the 12.7-mile C-W trip length modeled with the CalEEMod 2013.2.2 model, broken down by source of emissions. Table 3.J provides the same information, but broken down by type of pollutant emissions, As shown, similar to the analysis performed with CalEEMod 2011.1.1 (see Draft Subsequent EIR, Section 4.5.7; Final Subsequent EIR, Section 3.1.1), the comparison of the Modified Project's and Alternative 9's operational GHG emissions with the BAU scenario as calculated by CalEEMod 2013.2.2 would yield a less than significant impact, and no mitigation would be required. In addition, as compared to the proposed Modified Project, Alternative 9 would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to GHG emissions.

Table 3.I: Operational Greenhouse Gas Emissions Summary Comparison - by Source

Category	Pollutant Emissions, MT/year						
	Construction CO_2e	Area CO_2e	Energy CO_2e	Mobile CO_2e	Waste CO_2e	Water CO_2e	Total CO_2e
Approved Project							
Business-As-Usual	200	140	3,400	2,480	100	400	6,720
As Proposed	200	125	3,140	2,190	101	367	6,120
Emissions Reduction	0	15	260	290	-1	33	600
Percent Reduction	0.0%	10.7%	7.6%	11.7%	-1.0%	8.3%	8.9%
Proposed Modified Project							
Business-As-Usual	330	0.0610	11,300	5,080	440	2,070	19,200
As Proposed	230	0.0605	7,900	5,080	309	1,450	15,000
Emissions Reduction	100	0.0005	3,400	0	131	620	4,200
Percent Reduction	30.3%	0.8%	30.1%	0.0%	29.8%	30.0%	21.9%
Proposed Alternative 9							
Business-As-Usual	330	0.0610	11,300	4,990	440	2,040	19,100
As Proposed	230	0.0605	7,890	4,990	310	1,430	14,900
Emissions Reduction	100	0.0005	3,410	0	130	610	4,200
Percent Reduction	30.3%	0.8%	30.2%	0.0%	29.5%	29.9%	22.0%

Source: LSA Associates, Inc., October 2014.
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
Note: Numbers in table may not appear to add up correctly due to rounding of all numbers to three significant digits.
CO_2e = carbon dioxide equivalent MT = metric tons

Table 3.J: Long-Term Operational Greenhouse Gas Emissions Summary

Category	Pollutant Emissions, MT/year					
	Bio-CO_2	NBio-CO_2	Total CO_2	CH_4	N_2O	CO_2e
Approved Project						
Business-As-Usual	56.0	6,550	6,610	4.03	0.0700	6,720
As Proposed	55.1	5,960	6,020	3.90	0.0644	6,120
Emissions Reduction	0.9	590	590	0.13	0.0056	600
Percent Reduction	1.6%	9.0%	8.9%	3.3%	8.0%	8.9%
Proposed Modified Project						
Business-As-Usual	260	18,400	18,700	19.0	0.280	19,200
As Proposed	179	14,500	14,600	12.8	0.194	15,000
Emissions Reduction	81	3,900	4,100	6.2	0.086	4,200
Percent Reduction	31.2%	21.2%	21.9%	32.6%	30.7%	21.9%
Proposed Alternative 9						
Business-As-Usual	260	18,300	18,600	18.0	0.280	19,100
As Proposed	179	14,400	14,500	12.7	0.193	14,900
Emissions Reduction	81	3,900	4,100	5.3	0.087	4,200
Percent Reduction	31.2%	21.3%	22.0%	29.4%	31.1%	22.0%

Source: LSA Associates, Inc., October 2014.
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
Note: Numbers in table may not appear to add up correctly due to rounding of all numbers to three significant digits.
Bio-CO_2 = biologically generated CO_2 MT/year = metric tons per year
CH_4 = methane N_2O = nitrous oxide
CO_2 = carbon dioxide NBio-CO_2 = non-biologically generated CO_2
CO_2e = carbon dioxide equivalent

As such, the use of the CalEEMod 2013.2.2 model did not change the impact conclusions from the original analyses for the Modified Project and Alternative 9 in the Subsequent EIR (see Chapter 4.5 of the Draft Subsequent EIR and Section 3.1.1 of the Final Subsequent EIR).

Another method to analyze the emission reduction between BAU and the As Proposed condition is to apply the effects of the proposed project design features and regulations enacted since AB 32 that affect project efficiency to the inputs of the CalEEMod modeling rather than to the results, as was done for the analysis in Tables 3.I and 3.J above. CalEEMod version 2013.2.2 has better tools built into the model to support this type of analysis than version 2011.1.1. Table 3.K lists the operational GHG emissions for the Approved Project, the proposed Modified Project, and Alternative 9 for 2021 using the same Published Rates vehicle trip rates and the 12.7-mile C-W trip length used in the analyses for Tables 3.I and 3.J above, broken down by the source of emissions. Table 3.L provides the same information, but broken down by type of pollutant emissions. See the summary CalEEMod input files, which are included in Appendix AN of the Subsequent EIR.

All three BAU scenarios have the energy usage set to 2005 Title 24 California Building Code (CBC) levels. The As Proposed Approved Project scenario has energy usage set to exceed 2005 Title 24 CBC levels by 10 percent and water conservation measures achieving a 5 percent improvement over BAU. The As Proposed Modified Project and Alternative 9 scenarios both have the energy, water and waste conservation usage set to meet 2013 Title 24 CBC levels (CalEEMod 2013.2.2 only includes the 2010 CBC; based on the California Energy Commission (CEC) information that the 2013 CBC generally achieves a 25 percent improvement over the 2010 CBC, the As Proposed Modified Project and Alternative 9 scenarios both have the energy usage set to exceed the 2010 CBC by 25 percent in the mitigation section of CalEEMod) and include water and waste conservation measures achieving a corresponding 35 and 50 percent improvement, respectively, to represent what the project is required to accomplish to comply with the 2013 CBC and the stringent water and waste conservation project features planned.

As shown in Tables 3.K and 3.L, similar to the analysis performed above, the BAU comparison of the Modified Project and Alternative 9 calculated by CalEEMod 2013.2.2 would result in the same conclusion of a less than significant impact related to GHG emissions as provided in the Draft Subsequent EIR (see Draft Subsequent EIR, Section 4.5.7; Final Subsequent EIR, Section 3.1.1), and no mitigation would be required. In addition, as compared to the proposed Modified Project, Alternative 9 would not involve new significant environmental effects or a substantial increase in the severity of previously identified significant effects related to GHG emissions. Therefore, the conclusions regarding GHG emissions do not change whether emission reductions are modeled by applying PDFs and AB 32 factors to CalEEMod inputs or results.

As a result, the results of this supplemental analysis do not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact. Whether the CalEEMod inputs or outputs are adjusted for the BAU analysis, the conclusion would be the same. The proposed Modified Project and Alternative 9 are not significant for GHG emissions.

Table 3.K: Operational Greenhouse Gas Emissions Summary Comparison by Source

Category	Pollutant Emissions, MT/year						
	Construction CO_2e	Area CO_2e	Energy CO_2e	Mobile CO_2e	Waste CO_2e	Water CO_2e	Total CO_2e
Approved Project							
Business-As-Usual	230	125	3,140	2,190	101	367	6,150
As Proposed	230	125	2,910	2,190	101	342	5,900
Emissions Reduction	0	0	230	0	0	25	250
Percent Reduction	0.0%	0.0%	7.3%	0.0%	0.0%	6.8%	4.1%
Proposed Modified Project							
Business-As-Usual	270	0.0605	8,220	5,080	309	1,450	15,300
As Proposed	190	0.0605	6,370	5,080	155	923	12,800
Emissions Reduction	80	0	1,850	0	154	527	2,500
Percent Reduction	29.6%	0.0%	22.5%	0.0%	49.8%	36.3%	16.3%
Proposed Alternative 9							
Business-As-Usual	270	0.0605	8,210	4,990	310	1,430	15,200
As Proposed	190	0.0605	6,360	4,990	155	911	12,600
Emissions Reduction	80	0	1,850	0	155	519	2,600
Percent Reduction	29.6%	0.0%	22.5%	0.0%	50.0%	36.3%	17.1%

Source: LSA Associates, Inc., September 2014.
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
Note: Numbers in table may not appear to add up correctly due to rounding of all numbers to three significant digits.
CO_2e = carbon dioxide equivalent MT = metric tons

Table 3.L: Long-Term Operational Greenhouse Gas Emissions Summary

Category	Pollutant Emissions, MT/year					
	Bio- CO_2	NBio- CO_2	Total CO_2	CH_4	N_2O	CO_2e
Approved Project						
Business-As-Usual	55.1	5,980	6,040	3.90	0.0650	6,150
As Proposed	54.6	5,730	5,780	3.84	0.0610	5,900
Emissions Reduction	0.5	250	260	0.06	0.004	250
Percent Reduction	0.9%	4.2%	4.3%	1.6%	6.3%	4.1%
Proposed Modified Project						
Business-As-Usual	179	14,800	15,000	12.8	0.200	15,300
As Proposed	95.7	12,500	12,600	7.20	0.139	12,800
Emissions Reduction	83.3	2,300	2,400	5.6	0.061	2,500
Percent Reduction	46.5%	15.5%	16.0%	44.0%	29.8%	16.3%
Proposed Alternative 9						
Business-As-Usual	179	14,700	14,900	12.7	0.200	15,200
As Proposed	95.4	12,400	12,500	7.20	0.140	12,600
Emissions Reduction	83.6	2,300	2,400	5.5	0.060	2,600
Percent Reduction	46.7%	15.6%	16.1%	43.6%	29.9%	17.1%

Source: LSA Associates, Inc., September 2014.
Note: These emissions do not include the benefits of the planned 93,040 square-foot green roof on the parking structure.
Note: Numbers in table may not appear to add up correctly due to rounding of all numbers to two significant digits.
Bio-CO_2 = biologically generated CO_2 MT = metric tons
CH_4 = methane N_2O = nitrous oxide
CO_2 = carbon dioxide NBio-CO_2 = non-biologically generated CO_2
CO_2e = carbon dioxide equivalent

3.5 AMBIENT NOISE MONITORING

As stated in Section 4.8 of the Draft Subsequent EIR, LSA Associates, Inc. (LSA) conducted an ambient noise survey in the vicinity of the Project site at eight locations on February 22, 2012, during daytime hours between 10:30 a.m. and 3:30 p.m. LSA also conducted nighttime noise measurements on February 29 and March 1, 2012, during nighttime hours between 10:00 p.m. on February 29, 2012, and 1:00 a.m. on March 1, 2012. Each noise measurement was conducted for 15 minutes except for the nighttime noise measurements that were conducted in the residential areas (Locations 1, 3, and 6) and at Beverly Hills High School (Location 8), where few traffic or other noise sources were measured. At these four locations, the measured noise levels were recorded for 10 minutes and averaged to determine the ambient noise level. Table 4.8.L in the Draft Subsequent EIR lists the measured noise levels.

The ambient noise level at a particular location is the overall environmental noise level caused by all noise sources in the area, both near and far, including all forms of traffic, industry, lawnmowers, wind in foliage, insects, and animals, etc. Ambient noise levels typically fluctuate throughout the day, depending on the noise sources in the vicinity of the noise measurement location. Noise levels fluctuate between the maximum and the minimum but generally lie in the range between these two extremes. In a developed urban area dominated by vehicular traffic noise, ambient noise levels fluctuate within a narrow range.

To determine the ambient noise level in a specific area, Chapter XI, Section 111.01(a) of the Los Angeles Municipal Code specifies that ambient noise shall be averaged over a period of at least 15 minutes at a location and time of day comparable to that during which the measurement is taken of the particular noise source being measured. At the four locations where noise measurements were conducted for 10 minutes (Locations 1, 3, 6, and 8), there was little variation in the noise level over the entire measurement period (i.e., there were no unusual events, and noise levels were steady for the entire 10 minutes). Except for occasional vehicular traffic, there were no other noise-generating events in the vicinity of these noise measurement locations during the nighttime hours. Because the ambient noise level is an average, halting the noise measurements after 10 minutes in such a stable environment has little effect on the calculation of the ambient noise level and does not affect the validity of the ambient noise levels measured at these locations.

Nevertheless, LSA conducted follow-up ambient noise monitoring between 10:10 p.m. on December 10, 2013, and 12:11 a.m. on December 11, 2013, at the four measurement locations where nighttime ambient noise measurement was previously conducted for 10 minutes each (Locations 1, 3, 6, and 8). In December 2013, the noise measurements were taken for 15 minutes at each location. Table 3.M provides the measured ambient noise levels from 2012 and 2013. Similar to the ambient noise levels obtained during nighttime hours between 10:00 p.m. on February 29, 2012, and 1:00 a.m. on March 1, 2012, the dominant noise sources were vehicular traffic on local streets.

Table 3.M: Noise Measurements

Location	Measured Ambient Noise Levels (dBA)		Difference
	2012 Nighttime L_{eq} (10 p.m.–7 a.m.)	2013 Nighttime L_{eq} (10 p.m.–7 a.m.)	
1	52.7	52.1	-0.6
3	53.5	55.4	1.9
6	49.5	51.9	2.4
8	51.2	46.9	-4.3

dBA = A-weighted decibel
L_{eq} = Equivalent continuous noise level

Comparison between the ambient noise levels measured in 2012 and 2013 at the above four locations in the project vicinity shows that two locations recorded a slightly lower ambient noise level and two locations recorded a small increase in the nighttime ambient noise level (1.9 dBA and 2.4 dBA). The largest change, at Location 8 (Beverly Hills High School), recorded a 4.3 dBA lower nighttime ambient noise level compared to the 2012 ambient noise level. It is believed that this change was due to less traffic in the vicinity of the high school during the 2013 nighttime noise measurement period. Overall, these small differences are not unexpected in an urban environment where ambient noise levels are heavily influenced by traffic and surrounding development.

Section 4.8 of the Draft Subsequent EIR and Section 3.0 of the Final Subsequent EIR demonstrated that noise levels associated with the proposed Modified Project and Alternative 9 would not cause noise levels to increase over ambient noise conditions by 5 dBA at the closest receptor locations that are within close proximity to the Project site. Other off-site noise-sensitive receptor locations, including Locations 1, 3, 6, and 8, are at longer distances from the Project site and shielded by intervening structures/buildings between the Project site and these offsite locations. They would be exposed to noise associated with on-site sources at levels much lower than those that are closest to the Project site evaluated in the noise impact analysis. Due to the small variation in ambient noise measurements at Locations 1, 3, 6, and 8 (between 2012 and 2013) and the distance between the Project site and these locations, it can be concluded that the proposed Modified Project and Alternative 9 would not cause noise levels to increase ambient noise conditions by 5 dBA at the closest or any other off-site noise-sensitive receptor location, including Locations 1, 3, 6, and 8, even if the 2013 noise measurements are used in the analysis. Therefore, the 2013 ambient noise levels would not affect the findings or conclusions of the Draft and Final Subsequent EIR. Because no on-site noise or vibration sources would affect the other noise-sensitive locations in the immediate vicinity of the Project site, impacts related to on-site noise and vibration would be less than significant for the proposed Modified Project and for Alternative 9.

Therefore, this supplemental analysis does not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

3.6 CONSTRUCTION EQUIPMENT NOISE ATTENUATION

As discussed in detail in Chapter 4.8 of the Draft Subsequent EIR and Section 3.1.1 of the Final Subsequent EIR, noise produced during construction of the proposed Modified Project or Alternative 9 would not result in any significant impacts with the implementation of Mitigation Measures 4.8.1 and 4.8.2, and with compliance with Section 41.40 of the Los Angeles Municipal Code. All aspects of the construction noise analysis were properly characterized in the Draft Subsequent EIR, including the heights of construction equipment noise sources and receptors when calculating the effectiveness of the proposed construction noise barrier which would be required by Mitigation Measure 4.8.1. Commenters on the Subsequent EIR have criticized the construction noise analysis by claiming that it understates the height and noise generated by heavy construction equipment exhaust stacks, and that it underestimates the height of noise receptors at the Century Plaza Hotel, thereby overstating the effectiveness of the noise barrier. As explained in Response to Comment O-27B-8, these criticisms are without merit.

According to the Los Angeles Municipal Code, a noise level increase of 5 dBA over the existing average ambient noise level at an adjacent property line is considered a noise violation. In addition to the discussion of construction noise provided in Chapter 4.8, Noise, of the Draft Subsequent EIR and Section 3.1.1 and the Responses to Comments in the Final Subsequent EIR, the following analyses support the conclusions reached in the Subsequent EIR, that construction noise for the proposed Modified

Project or Alternative 9 would not result in an increase of 5 dBA or more over the existing ambient noise level.

First, the analysis in the Subsequent EIR properly accounted for the height and sources of construction equipment noise. As described in Response to Comment O-27B-8 in the Final Subsequent EIR, construction equipment usually emits noise from several sources including, but not limited to, engines, exhaust pipes, and wheel/tire interaction with the ground surface. The typical exhaust height for construction equipment is 9 feet, the typical engine height is 4 feet, and the typical height of the wheel/tire interaction is less than 1 foot. The average height of all three sources is 4.7 feet. The engine of the heavy duty equipment is the dominant source of noise, with the exhaust and wheel/ground interaction contributing additional noise from the equipment. Therefore, providing a noise barrier that is higher than the engine makes the greatest difference with regard to noise attenuation. Mitigation Measure 4.8.1 would require a construction noise barrier at a minimum height of 8 feet.

Second, the Subsequent EIR also properly accounted for the elevation of noise receptors at the Century Plaza Hotel, the property line of which is located 140 feet from the edge of the Project site. While the Century Plaza Hotel is approximately 5 feet higher in elevation than the edge of the Project site, the small elevation difference would not substantially change the line-of-sight between the Project site and the Century Plaza Hotel, and the 8-foot noise barrier required by Mitigation Measure 4.8.1, which is approximately 10 feet from the active construction area, would be an effective means of reducing noise at the Century Plaza Hotel property line to a less than significant level. Using a receiver height of 5 feet, a receiver elevation of 5 feet, a source height of 4.7 feet, a distance of 140 feet from the receiver to the sound barrier, and a distance of 10 feet between the construction equipment and the sound barrier, the noise attenuation for the construction equipment would be 8.2 decibels. This barrier would reduce the project's construction-related noise at the Century Plaza Hotel property line from up to 77 dBA L_{eq} to 69 dBA L_{eq} or less. The ambient noise level in the vicinity of the Century Plaza Hotel is 68 dBA L_{eq}. Therefore, with the 8-foot noise barrier, the project's construction-related noise increase at the Century Plaza Hotel property line would be 1 dBA or less, which is less than the City's 5 dBA threshold (refer to pages 4.8-91 and 4.8-92 in the Draft Subsequent EIR).

As stated above, commenters on the Subsequent EIR claimed that Draft Subsequent EIR understates the noise generated by heavy construction equipment exhaust stacks. The following shows that, even evaluating the three construction equipment noise sources individually, the recommended noise barrier height would reduce construction noise from all noise sources below a level of significance. As discussed above, the engine is the dominant noise source; however, as a worst case condition, this supplemental analysis assumes that all three sources (engines, exhaust pipes, and wheel/tire interaction with the ground surface) would generate the same noise level. As discussed on Page 4.8-32 and shown in Table 4.8.N of the Subsequent EIR, the total noise for construction is 86 dBA L_{eq} at a reference distance of 50 feet from the center of the construction activity. When all three noise sources generate the same noise level, in order to generate the total noise level of 86 dBA, the noise level from each source would be 81 dBA (81 dBA + 81 dBA = 84 dBA; 84 dBA + 81 dBA = 86 dBA). Therefore, for this analysis, each of the three noise sources is assumed to generate 81 dBA at a distance of 50 feet. Using a receiver height of 5 feet, a receiver elevation of 5 feet, source heights of 9, 4, and 1 feet, a distance of 140 feet from the receiver to the sound barrier, and a distance of 10 feet between the construction equipment and the sound barrier, the noise attenuation of the 8 foot barrier for the exhaust, engine, and tire/track noise would be 4.2, 9.2, and 12.1 decibels, respectively. At a distance of 140 feet from the barrier, the noise levels from the exhaust, engine, and tire/track noise would be 67.3, 62.3, and 59.4 decibels, respectively. The combined noise level, from all three noise sources associated with the construction equipment, at the receiver after attenuation would be 69 dBA. This is the same noise level calculated above using the single source height of 4.7 feet associated with the engine source height. The construction noise calculations are summarized in Table 3.N.

Table 3.N: Construction Noise Level at Century Plaza Hotel using Three Source Heights

Noise Source	Source Height (feet)	Noise Level at 50 feet (dBA Leq)	Noise Level at Century Plaza without Barrier (dBA Leq)	Noise Attenuation of 8-foot Barrier (dBA)	Attenuated Noise Level (dBA Leq)
Exhaust	9	81	71.5	4.2	67.3
Engine	4	81	71.5	9.2	62.3
Tire	1	81	71.5	12.1	59.4
Total		86	76.5		69

dBA = A-weighted decibel
L_{eq} = Equivalent continuous noise level

Commenters on the Subsequent EIR also claimed that Draft Subsequent EIR understates the height of heavy construction equipment exhaust stacks and the height of noise receptors at the Century Plaza Hotel. These commenters suggest, without evidentiary support, using heights of up to 8 feet for the engine noise and 12 feet for the exhaust noise and increasing the receiver elevation from 5 to 10 feet. As shown in Table 4.8.N of the Draft Subsequent EIR, the noisiest construction phases are the ground clearing and finishing phases. The largest construction equipment used during those phases are motor graders, excavators, and loaders/backhoes. Table 3.O lists the source heights for the exhaust stacks and engines for each equipment type. As shown, these heights are consistent with those used in Table 3.N and are much lower than the heights recommended by the commenters.

Table 3.O: Construction Equipment Engine and Exhaust Stack Heights

Equipment Type	Engine Height (feet)	Exhaust Stack Height (feet)
Motor Grader	6.5	9.6
Excavator	4.5	7.2
Loader/Backhoe	3.0	8.3
Average	4.7	8.4

Source: Caterpillar Performance Handbook, Edition 42, 2012.

Nevertheless, in order to address this claim and to be conservative, the construction-related noise increase at the Century Plaza Hotel was calculated using the worst case engine height (8 feet), stack heights (12 feet), and receptor height (10 feet) and assuming all three noise sources (engines, exhaust pipes, and wheel/tire interaction with the ground surface) generate the same noise level (81 dBA at a distance of 50 feet). Using these heights, along with a height of 1 foot for tire/track noise, the noise attenuation produced by the 8 foot barrier would be reduced to 0.3, 4.9, and 11.5 decibels, for the exhaust, engine, and tire/track noise respectively. At a distance of 140 feet from the barrier, the noise levels from the exhaust, engine, and tire/track noise would be 71.2, 66.6, and 60.0 decibels, respectively. The combined noise level from all three noise sources associated with the construction equipment at the receiver after attenuation would be 72.7 dBA L_{eq}. The ambient noise level in the vicinity of the Century Plaza Hotel is 68 dBA L_{eq}. Using the worst case conditions provided by the commenters, the Project's construction-related noise increase at the Century Plaza Hotel property line would be 4.7 dBA, which is less than the City's 5 dBA threshold and a less than significant impact. The construction noise calculations are summarized in Table 3.P.

Table 3.P: Construction Noise Level at Century Plaza Hotel using Commenter Source Heights

Noise Source	Source Height (feet)	Noise Level at 50 feet (dBA L_{eq})	Noise Level at Century Plaza without Wall (dBA L_{eq})	Noise Attenuation of 8-foot Wall (dBA)	Attenuated Noise Level (dBA L_{eq})
Exhaust	12	81	71.5	0.3	71.2
Engine	8	81	71.5	4.9	66.6
Tire	1	81	71.5	11.5	60.0
Total		86	76.5		72.7

dBA = A-weighted decibels
L_{eq} = equivalent continuous noise level

Therefore, with implementation of the temporary construction barrier required by Mitigation Measure 4.8.1, construction noise impacts would be reduced to a less than significant level. As a result, the results of this supplemental analysis do not result in a new significant impact or a substantial increase in the severity of a previously identified significant impact.

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Gibson
transportation consulting, inc.

MEMORANDUM

TO: LSA Associates, Inc.

FROM: Jonathan Chambers, P.E.

DATE: October 6, 2014

RE: Estimation of Average Trip Lengths
To and From Century City Center
Century City, California **Ref:** J1076

This memorandum was prepared to document the methodology used to estimate average trip lengths for trips made to and from Century City Center. The estimates were based on residential zip code data provided by the Century City Chamber of Commerce in year 2011 for approximately 4,600 employees working within Century City. This data covers a wide cross-section of employees in Century City and is generally applicable to any office building in Century City, including the proposed Century City Center at 1950 Avenue of the Stars.

The residential zip code data provided by the Century City Chamber of Commerce was used to determine the length of Commercial-work (C-W) trips to and from Century City. C-W trips comprise the majority of peak hour trips generated by an office building in Century City. Other daily trips often consist of trips to business meetings and trips to lunch, both of which are generally a shorter distance than commute trips. Therefore, using the results of this residential zip code analysis (C-W trips) as a proxy for the length of all trips to and from Century City Center is a conservative assumption, likely overstating the actual average trip length.

Distance to Employee Residences

The zip code data was plotted onto a map using GIS and was analyzed to determine how far the employees had to drive to Century City for work. A series of concentric rings centered on Century City were drawn over the map at various radii, including 2 miles, 5 miles, 10 miles, 15 miles, 20 miles, 25 miles, 40 miles, and 60 miles. The number of zip code data points within each radius band was totaled, representing the number of employees living within that range of distance (i.e., 2 to 5 miles) from Century City. Figures 1 and 2 show this distribution on a regional and local basis, respectively. The raw data is provided in the Attachment.

Table 1 below summarizes the results of that analysis.

Table 1 – Straight-Line Distance to Employee Residences

Radius (miles)	# of Employees	Percentage
0 - 2	432	9.4%
2 - 5	1,390	30.3%
5 - 10	1,142	24.9%
10 - 15	644	14.0%
15 - 20	383	8.3%
20 - 25	251	5.5%
25 - 40	275	6.0%
40 - 60	73	1.6%
Total	**4,590**	

As shown, the survey included a total of 4,590 employees living within 60 miles of Century City. By analyzing the percentage of employees living within each band, the data show that approximately 65% of all Century City employees live within 10 miles of Century City and nearly 80% live within 15 miles.

It is important to note that these distances represent straight-line distance ("as the crow flies"), rather than actual driving distance. In practice, driving distance may be somewhat longer than the straight-line distance to any location. As described below, to address this issue, a conservative assumption of distance was applied that likely overstates actual driving distance for most employees.

Driving Distance Estimates

An assumption was made for each distance category as to how far each employee would likely have to drive in order to reach Century City. Each employee was conservatively assumed to drive the distance of the upper range of his distance category. For example, all of the 1,390 employees living between two and five miles from Century City were assumed to have to drive five miles each way for work. This same assumption was applied to each distance category as demonstrated below. This is a conservative assumption as it is likely that many people drive a distance nearer to the lower end of their distance categories.

Table 2 shows the driving distance assumption for each distance category as well as the cumulative total number of one-way miles driven by the workers in that category.

Table 2 – Distance Assumption and Total Miles Driven

Radius (miles)	# of Employees	Percentage	Assumed Distance	Total Miles Driven
0 - 2	432	9.4%	2	864
2 - 5	1,390	30.3%	5	6,950
5 - 10	1,142	24.9%	10	11,420
10 - 15	644	14.0%	15	9,660
15 - 20	383	8.3%	20	7,660
20 - 25	251	5.5%	25	6,275
25 - 40	275	6.0%	40	11,000
40 - 60	73	1.6%	60	4,380
Total	**4,590**			**58,209**
			Overall Average Distance	**12.7**

As shown in Table 2, the overall average distance each employee drives (one way) for work each day is approximately 12.7 miles. As described above, because this analysis only considers commute trips and excludes typically shorter mid-day trips such as for business meetings or lunches, it represents a conservative estimate for the average trip length for office buildings in Century City.

ISTRIBUTION OF CENTURY CITY EMPLOYEE RESIDENCES BY ZIP CODE - REGIONAL

FIGURE 1

DISTRIBUTION OF CENTURY CITY EMPLOYEE RESIDENCES BY ZIP CODE - LOCAL

FIGURE 2

Attachment

Zip Coda Data

Zip Code	Number of Employees
92694	1
92530	1
92563	1
90720	2
90815	6
90740	1
90008	18
90037	6
90043	23
90062	6
90044	7
90047	16
90001	3
90003	3
90011	4
90023	4
90059	1
90061	4
90255	2
90262	1
90280	6
90040	2
90606	2
90640	4
90660	8
90240	4
90241	3
90242	2
90670	1
90650	5
90701	2
90703	5
90706	3
90723	2
90805	1
90807	6
90712	1
90713	3
90808	3
90601	3
90602	1
90603	2
90604	3
90605	1
90631	1
91709	5
91710	4
91745	6
91748	3
91765	1
91789	1
92821	3
92880	2
90621	1
90623	5
90630	1
90638	3

Zip Code	Number of Employees
92804	1
92805	2
92833	1
92865	1
92831	1
92835	2
92807	2
92887	1
92626	4
92627	1
92646	2
92648	3
92660	1
92663	1
92708	4
92647	2
92649	4
92683	5
92706	1
92845	2
92866	1
92780	1
92782	3
92867	1
92604	1
92606	2
92610	1
92620	1
92630	2
92688	2
90046	141
90048	77
90016	31
90019	74
90035	96
90036	106
90067	75
90211	19
90212	43
90027	34
90068	40
91001	7
91011	10
91201	6
91202	9
91203	1
91204	3
91205	7
91020	1
91207	9
91208	3
90041	15
91101	9
91103	2
91104	9
91105	8
91106	7

Zip Code	Number of Employees
91206	16
90005	20
90006	12
90007	4
90010	1
90013	4
90014	6
90015	1
90018	15
90020	20
90021	1
90022	3
90033	2
90057	7
90063	5
91754	7
91755	4
90012	11
90017	6
90071	1
90004	33
90026	21
90028	31
90029	10
90038	25
90039	14
90065	12
90078	1
90031	4
90032	5
90042	18
91030	11
91108	9
91801	14
91803	6
91706	2
91723	1
91731	1
91732	3
91733	4
91744	3
91746	1
91770	4
91775	9
91776	3
91780	3
91790	4
91791	6
91006	5
91007	5
91016	3
91024	1
91107	16
91702	2
91711	2
91750	2
91784	1

Zip Code	Number of Employees
91724	1
91740	2
91767	3
91773	6
91786	2
91701	2
91737	2
91761	1
91764	3
92335	1
92336	3
92337	1
92324	2
92407	1
92223	1
92555	2
92503	2
92551	1
92860	2
92373	1
92506	2
92507	1
93110	1
90265	12
90290	13
91302	25
91320	9
91360	13
91361	10
91362	18
93012	3
93035	2
93003	1
93021	9
93063	16
93065	20
91301	20
91303	4
91304	18
91306	8
91307	17
91364	17
91367	29
91377	6
90401	15
90405	69
90049	122
90272	35
90402	19
90403	81
90404	43
90024	74
90025	157
90095	1
91356	30
93309	1
91384	2

Zip Code	Number of Employees
91354	18
91390	11
93510	1
93534	1
93535	1
93536	5
93550	4
93551	5
93552	2
91311	19
91355	16
91381	18
90069	86
90077	18
90210	29
91316	30
91335	15
91403	54
91406	23
91411	15
91436	21
91401	35
91402	7
91405	11
91408	1
91505	23
91605	10
91606	13
91423	50
91601	30
91602	26
91604	55
91607	27
91506	10
91501	18
91502	4
91504	13
91324	11
91325	15
91326	13
91331	5
91334	1
91340	3
91342	13
91343	17
91344	21
91345	1
91352	5
91394	1
91321	6
91350	15
91351	10
91387	9
91040	4
91042	4
91214	7

CalEEMod Input Parameters for Tables 3.B & 3.E

Century City Center - Alt. 9: Enhanced Retail - Empirical Rate 2015 & 2021 **CCY1101**

l Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
lding	710.4	1000sqft	4.4	710,400	0
vith Elevator	1579	Space	1	631600	0
	19.5	1000sqft	0.1	19500	0
			5.5	1,361,500	

Location: AB / SC CalEEMod Version: 2013.2.2
Opening Year: 2015 & 2021
Climate Zone: 11
Utility Company: Los Angeles Department of Water & Power
CO_2 Intensity Factor 1,104 (lb/MWh)
CH_4 Intensity Factor 0.029 (lb/MWh)
N_2O Intensity Factor 0.011 (lb/MWh)

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary		Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Divert Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
4.69	4.69	4.69	0	0	0	8.4	12.7	6.9	77	19	4	3,331.8
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.62	4.62	4.29	10.54	0.39	126,262,055	77,386,421	660.67
0	0	64.4	16.6	19	4.9	3.23	7.04	1.21	0.49	1,444,414	885,286	20.48

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%

CalEEMod Input Parameters for Tables 3.C & 3.F

ıtury City Center - Alt. 9: Enhanced Retail - Economy Adjustment Rate 2015 & 2021 **CCY1101**

ı Use	Land Use	Land Use	Lot	Land Use	
Type	Unit Amount	Size Metric	Acreage	Square Feet	Population
lding	710.4	1000sqft	4.4	710,400	0
vith Elevator	1579	Space	1	631600	0
	19.5	1000sqft	0.1	19500	0
			5.5	1,361,500	

Location: AB / SC CalEEMod Version: .2013.2.2
Opening Year: 2015 & 2021
Climate Zone: 11
Utility Company: Los Angeles Department of Water & Power
CO_2 Intensity Factor 1,104 (lb/MWh)
CH_4 Intensity Factor 0.029 (lb/MWh)
N_2O Intensity Factor 0.011 (lb/MWh)

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary		Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Divert Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
4.97	4.97	4.97	0	0	0	8.4	12.7	6.9	77	19	4	3,530.7
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.62	4.62	4.29	10.54	0.39	126,262,055	77,386,421	660.67
0	0	64.4	16.6	19	4.9	3.23	7.04	1.21	0.49	1,444,414	885,286	20.48

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%

CalEEMod Input Parameters for Tables 3.D & 3.G

Century City Center - Alt. 9: Enhanced Retail - Published Rates 2015 & 2021 **CCY1101**

d Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
lding	710.4	1000sqft	4.4	710,400	0
vith Elevator	1579	Space	1	631600	0
	19.5	1000sqft	0.1	19500	0
			5.5	1,361,500	

Location:	AB / SC		CalEEMod Version: 2013.2.2
Opening Year:	2015	& 2021	
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1,104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary		Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Divert Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
6.37	6.37	6.37	0	0	0	8.4	12.7	6.9	77	19	4	4,525.2
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.62	4.62	4.29	10.54	0.39	126,262,055	77,386,421	660.67
0	0	64.4	16.6	19	4.9	3.23	7.04	1.21	0.49	1,444,414	885,286	20.48

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%
6.04%	18.00%	13.99%	4.19%	0.66%	1.55%	2.87%	0.19%	0.25%	0.43%	0.06%	0.21%	100.00%

CalEEMod Input Parameters for Approved Project - As Proposed line of Tables 3.I & 3.J

10130 Constellation Park - as in the 2006 EIR **CCY1101**

l Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
vith Elevator	1208	Space	2	483,200	0
	1.7	Acre	1.7	74,052	0
High Rise	483	Dwelling Unit	1.8	1,292,358	1381
			5.5	1,849,610	

Location:	AB / SC	CalEEMod Version:	2013.2.2
Opening Year:	2021		
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary	Divert	Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	66	28	6	0.0
4.1	4.1	4.1	10.8	7.3	7.5	0	0	0	86	11	3	1,980.3
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	48	33	19	0	0	0	0	0	0	2,025,518	0.15
19.2	40.6	0	0	0	230.21	3,126	1,001	14,174	3,047	31,469,394	19,839,401	222.18
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%

CalEEMod Input Parameters for Proposed Modified Project - As Proposed line of Tables 3.I & 3.J

Century City Center - Modified Project - Published Rates **CCY1101**

d Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
lding	725.83	1000sqft	4.41	725,830	0
vith Elevator	1579	Space	1	631,600	0
	4.12	1000sqft	0.09	4,120	0
			5.5	1,361,550	

Location:	AB / SC	CalEEMod Version:	2013.2.2
Opening Year:	2021		
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary	Divert	Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
6.34	6.34	6.34	0	0	0	8.4	12.7	6.9	77	19	4	4,601.8
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.62	4.62	4.29	10.54	0.39	129,004,486	79,067,266	675.02
0	0	64.4	16.6	19	4.9	3.23	7.04	1.21	0.49	305,179	187,045	4.33

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%

CalEEMod Input Parameters for Alternative 9 - As Proposed line of Tables 3.I & 3.J

Century City Center - Alt. 9: Enhanced Retail - Published Rates **CCY1101**

l Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
lding	710.4	1000sqft	4.4	710,400	0
vith Elevator	1579	Space	1	631,600	0
	19.5	1000sqft	0.1	19,500	0
			5.5	1,361,500	

Location:	AB / SC	CalEEMod Version:	2013.2.2
Opening Year:	2021		
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary	Divert	Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
6.37	6.37	6.37	0	0	0	8.4	12.7	6.9	77	19	4	4,525.2
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.62	4.62	4.29	10.54	0.39	126,262,055	77,386,421	660.67
0	0	64.4	16.6	19	4.9	3.23	7.04	1.21	0.49	1,444,414	885,286	20.48

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%

:Mod Input Parameters for Approved Project - Business-As-Usual & As-Proposed lines of Tables 3.K & 3.L

10130 Constellation Park - as in the 2006 EIR - As Proposed & BAU **CCY1101**

ı Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
ɔtructure	1208	Space	2	483,200	0
	1.7	Acre	1.7	74,052	0
High Rise	483	Dwelling Unit	1.8	1,292,358	1381
			5.5	1,849,610	

Location:	AB / SC	CalEEMod Version:	2013.2.2
Opening Year:	2021		
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary	Divert	Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	66	28	6	0.0
4.1	4.1	4.1	10.8	7.3	7.5	0	0	0	86	11	3	1,980.3
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	48	33	19	0	0	0	0	0	0	2,025,518	0.15
19.2	40.6	0	0	0	286.69	3,126	1,001	15,240	3,047	31,469,394	19,839,401	222.18
0	0	0	0	0	3.92	0	2.63	0	0	0	0	0

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%

ıt
10%, install high efficiency lighting percent energy reduction = 10%
r conservation strategy - percent reduction = 5%, apply outdoor water conservation strategy - percent reduction = 5%

EMod Input Parameters for Proposed Modified Project - Business-As-Usual line of Tables 3.K & 3.L

Century City Center - Modified Project - Published Rates - BAU **CCY1101**

d Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
lding	725.83	1000sqft	4.41	725,830	0
vith Elevator	1579	Space	1	631,600	0
	4.12	1000sqft	0.09	4,120	0
			5.5	1,361,550	

Location:	AB / SC	CalEEMod Version:	2013.2.2
Opening Year:	2021		
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary	Divert	Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
6.34	6.34	6.34	0	0	0	8.4	12.7	6.9	77	19	4	4,601.8
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.99	4.62	4.63	12.05	0.39	129,004,486	79,067,266	675.02
0	0	64.4	16.6	19	5.17	3.23	7.56	1.33	0.49	305,179	187,045	4.33

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%

representing 2005 Title 24 standards.

:alEEMod Input Parameters for Proposed Modified Project - As Proposed line of Tables 3.K & 3.L

Century City Center - Modified Project - Published Rates **CCY1101**

d Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
lding	725.83	1000sqft	4.41	725,830	0
vith Elevator	1579	Space	1	631,600	0
	4.12	1000sqft	0.09	4,120	0
			5.5	1,361,550	

Location:	AB / SC	CalEEMod Version:	2013.2.2
Opening Year:	2021		
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary	Divert	Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
6.34	6.34	6.34	0	0	0	8.4	12.7	6.9	77	19	4	4,601.8
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.62	4.62	4.29	10.54	0.39	129,004,486	79,067,266	675.02
0	0	64.4	16.6	19	4.9	3.23	7.04	1.21	0.49	305,179	187,045	4.33

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%

ıt
25%, install high efficiency lighting percent energy reduction = 25%
r conservation strategy - percent reduction = 35%, apply outdoor water conservation strategy - percent reduction = 35%
and composting services - waste percent reduction = 50%

CalEEMod Input Parameters for Alternative 9 - Business-As-Usual line of Tables 3.K & 3.L

Century City Center - Alt. 9: Enhanced Retail - Published Rates - BAU **CCY1101**

l Use	Land Use	Land Use	Lot	Land Use	
Type	Unit Amount	Size Metric	Acreage	Square Feet	Population
lding	710.4	1000sqft	4.4	710,400	0
vith Elevator	1579	Space	1	631,600	0
	19.5	1000sqft	0.1	19,500	0
			5.5	1,361,500	

Location:	AB / SC	CalEEMod Version:	2013.2.2
Opening Year:	2021		
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary	Divert	Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
6.37	6.37	6.37	0	0	0	8.4	12.7	6.9	77	19	4	4,525.2
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.99	4.62	4.63	12.05	0.39	126,262,055	77,386,421	660.67
0	0	64.4	16.6	19	5.17	3.23	7.56	1.33	0.49	1,444,414	885,286	20.48

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%

representing 2005 Title 24 standards.

CalEEMod Input Parameters for Alternative 9 - As Proposed line of Tables 3.K & 3.L

Century City Center - Alt. 9: Enhanced Retail - Published Rates **CCY1101**

d Use Type	Land Use Unit Amount	Land Use Size Metric	Lot Acreage	Land Use Square Feet	Population
lding	710.4	1000sqft	4.4	710,400	0
vith Elevator	1579	Space	1	631,600	0
	19.5	1000sqft	0.1	19,500	0
			5.5	1,361,500	

Location:	AB / SC	CalEEMod Version:	2013.2.2
Opening Year:	2021		
Climate Zone:	11		
Utility Company:	Los Angeles Department of Water & Power		
CO_2 Intensity Factor	1104	(lb/MWh)	
CH_4 Intensity Factor	0.029	(lb/MWh)	
N_2O Intensity Factor	0.011	(lb/MWh)	

Trip Rate (/size/day)			Residential Trip Length (miles)			Nonresidential Trip Len. (miles)			Primary	Divert	Pass-By	Total Trip
Weekday	Saturday	Sunday	H-W	H-S	H-O	C-C	C-W	C-NW	Trip %	Trip %	%	check
0	0	0	0	0	0	8.4	16.6	6.9	0	0	0	0.0
6.37	6.37	6.37	0	0	0	8.4	12.7	6.9	77	19	4	4,525.2
0	0	0	0	0	0	8.4	16.6	6.9	45	40	15	0.0

lential Trip Percentage		Nonresidential Trip Percentage			Energy Use (kWhr/size/yr) or (kBTU/size/yr)					Water Use (gal/yr)		Solid Waste
H-S	H-O	C-C	C-W	C-NW	Title 24 Electricity	NonTitle24 Elelctricity	Lighting Electricity	Title 24 NatGas	NonTitle24 NatGas	Indoor	Outdoor	(tons/yr)
0	0	0	0	0	3.92	0.19	2.63	0	0	0	0	0
0	0	48	33	19	5.62	4.62	4.29	10.54	0.39	126,262,055	77,386,421	660.67
0	0	64.4	16.6	19	4.9	3.23	7.04	1.21	0.49	1,444,414	885,286	20.48

LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH	Total
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%
5.97%	18.16%	14.01%	4.29%	0.67%	1.63%	3.33%	0.20%	0.25%	0.43%	0.06%	0.22%	100.00%

it
25%, install high efficiency lighting percent energy reduction = 25%
r conservation strategy - percent reduction = 35%, apply outdoor water conservation strategy - percent reduction = 35%
and composting services - waste percent reduction = 50%

Constellation Station Coalition

					Industry Type						
Building Name	Building Address	Sq.Ft.	Total # of Occupants	Occupants per 1,000 Sq.Ft.	Financial Sq.Ft.	Financial %	Law Firms Sq.Ft.	Law Firm %	Entertainment Sq. Ft.	Ent. %	Ot
Northrop Grumman Plaza	1800/1840 Century Park East	587,022	1210	2.06	58,702	10%	88,053	15%	17,611	3%	
Century Park Plaza	1801 Century Park East	373,902	741	1.98	123,388	33%	115,910	31%	-	0%	
Century City Office	1930 Century Park West	57,905	101	1.74	-	0%	-	0%	-	0%	
Gateway West	1801 Avenue of the Stars	239,000	1144	4.79	47,800	20%	83,650	35%	35,850	15%	
2000 Avenue of the Stars	2000 Avenue of the Stars	787,644	2495	3.17	362,946	46%	93,730	12%	303,400	39%	
1901 Avenue of the Stars	1901 Avenue of the Stars	492,223	1217	2.47	73,833	15%	201,811	41%	49,222	10%	
Medical Building	2080 Century Park East	199,534	800	4.01							
1940 Century Park	1940 Century Park East	48,339	140	2.90							
1888 Century Park East	1888 Century Park East	504,526	868	1.72	55,498	11%	166,494	33%	75,679	15%	
Meridian Bldg	1950 Century Park East	26,719	66	2.47							
Gateway East & 1900 AOS	1800 & 1900 Avenue of the Stars	879,305	2521	2.87	70,344	8%	659,479	75%	17,586	2%	
Fox Plaza	2121 Avenue of the Stars	730,510	2141	2.93	153,407	21%	73,051	10%	460,221	63%	
SunAmerica Center	1999 Avenue of the Stars	824,106	2340	2.84	453,258	55%	189,544	23%	-	0%	
MGM Tower	10250 Constellation Blvd	775,037	1570	2.03	270,565	35%	88,509	11%	351,402	45%	
1880 Century Park East	1880 Century Park East	311,400	670	2.15	-	0%	-	0%	-	0%	
Watt Plaza	1875/1925 Century Park East	904,890	2139	2.36	135,734	15%	361,956	40%	45,245	5%	
10100 Santa Monica	10100 Santa Monica Blvd.	605,657	1519	2.51	24,226	4%	284,659	47%	54,509	9%	
Century Plaza Towers	2029/2049 Century Park East	2,281,052	6800	2.98	598,092	26%	1,179,760	52%	115,877	5%	
Fox Studios	Fox Lot	1,015,533	2600	2.56	-	-	-	-	-	-	

CENTURY CITY TOTALS:	Bldg Sq.Ft.	Total # of Occupants	Occupants per 1,000 Sq.Ft.	Financial	%	Law	%	Entertainment	%
	11,644,304	**31,082**	**2.67**	**2,427,794**	**21%**	**3,586,606**	**31%**	**1,526,603**	**13%**

Century Plaza Hotel	2025 Avenue of the Stars	800,000	472 *
Intercontinental Hotel	2151 Avenue of the Stars	638,055	260 *
Westfield's Shopping Center	10250 Santa Monica Blvd.	857,000	450 *

* Includes employees only

CITY OF LOS ANGELES
INTER-DEPARTMENTAL MEMORANDUM

1950 Avenue of the Stars
LADOT Case No WLA11-028

DATE: August 8, 2014

TO: Honorable City Council
c/o City Clerk, Room 395
Attention: Honorable Jose Huizar, Chair, PLUM Committee

FROM: Jon Kirk Mukri, General Manager
Department of Transportation

SUBJECT: **CENTURY CITY CENTER PROJECT – ENHANCED RETAIL ALTERNATIVE**

[CITY PLANNING CASE NOS. CPC-2013-210-SPP-SPR-MSC AND CPC-2009-817-DA-M1]

On June 12, 2014, the Los Angeles City Planning Commission unanimously approved Alternative 9 (Enhanced Retail Alternative) in lieu of the proposed Modified Project for the Century City Center Project. The Los Angeles Department of Transportation (LADOT) confirms that the traffic analysis and alternative trip generation analysis of the Modified Project is consistent with the Enhanced Retail Alternative and there are no changes to our conclusions as set forth in our memoranda of December 18, 2012 and October 28, 2013.

The Enhanced Retail Alternative is similar to what was proposed for the Modified Project, except that office space has been slightly reduced and pedestrian-serving ancillary retail and Mobility Hub space has been slightly increased to better activate the plaza surrounding the proposed Purple Line subway portal, as requested by the Planning Commission. The Modified Project proposed the construction of a 37-story building with 700,000 square feet (sf) of office space, approximately 25,380 sf of low-rise office space, a Transit Plaza, 4,120 sf of small scale ancillary retail uses, and a1,300 sf of Mobility Hub. Under the Enhanced Retail Alternative, approximately 15,380 sf of proposed low- rise office space would be converted to ancillary retail space and Mobility Hub space. This letter confirms that LADOT has reviewed the potential traffic impacts and trip generation of the Enhanced Retail Alternative as provided in the Century City Center Project's Final Subsequent EIR, and that the analyses provided are consistent with and within the scope of LADOT's December 18, 2012 and October 28, 2013 memoranda for the Modified Project.

The Alternative Calculation of Trip Generation Factor for the Enhanced Retail Alternative is 4.97 daily trips per 1,000 square-feet (sf). The Enhanced Retail Alternative's ancillary retail and Mobility Hub uses are not expected to attract additional automobile trips to and from the project, which is consistent with language in the

Century City North Specific Plan that recognizes that incidental retail uses that do not exceed 3 percent of an office project's floor area do not result in additional Trip generation. This is also consistent with LADOT policy for small retail uses (here, less than 3 percent of the project's floor area). The retail and Mobility Hub uses would not be expected to generate any additional trips beyond the trips generated by the project's office uses, consistent with LADOT policy.

LADOT also confirms that the traffic mitigation program as approved by the City Planning Commission for the Enhanced Retail Alternative is substantially consistent with the mitigation program proposed for the Modified Project. After implementation of mitigation, the Enhanced Retail Alternative would not result in any additional or intensified traffic impacts as compared to the Modified Project. The Enhanced Retail Alternative would result in a slight reduction in trip generation as compared with the Modified Project due to the reduction in office square footage.

There will be a slight change in the calculation of the Transportation Impact Assessment (TIA) Fee which would be required for the project under Section 5 of the West Los Angeles Transportation Improvement and Mitigation Specific Plan (WLA TIMP). Pursuant to Section 5 of the WLA TIMP, an applicant for a project within the Specific Plan Area shall pay, or guarantee payment of, a TIA Fee prior to issuance of any building permit. The TIA Fee for the Enhanced Retail Alternative is **$1,222,656.00**, which is a reduction of $25,472 from the estimated TIA Fee for the Modified Project.

If you have any questions, please contact Jay Kim of my staff at (213) 972-8438.

c: Renee Dake Wilson, City Planning Commission
Joan Pelico, Shawn Bayliss, Jay Greenstein, Fifth Council District
Dan Scott, Lisa Webber, Jon Foreman, Karen Hoo, Erin Strelich, DCP
Jay Kim, Sean Haeri, Eddie Guerrero, Mo Blorfroshan, LADOT

Gibson
transportation consulting, inc.

MEMORANDUM

TO: LSA Associates, Inc.

FROM: Jonathan Chambers, P.E.

DATE: September 30, 2014

RE: Analysis of Alley Access to
Century City Center
Century City, California **Ref:** J1076

Gibson Transportation Consulting, Inc. was asked to prepare this supplemental analysis of potential traffic and circulation impacts involving the existing alleyway that is adjacent to the Project Site for the proposed Century City Center Project (located to the east), based on comments and requests made during the Project's public hearing process.

The Los Angeles Department of Transportation (LADOT) does not require that unsignalized intersections be analyzed for potential impacts. Rather, according to *Traffic Study Policies and Procedures* (LADOT, August 2014), unsignalized intersections that are adjacent to a project or are integral to a project's site access and circulation plan should be identified. For these intersections, vehicular delay should be estimated using the *Highway Capacity Manual* (Transportation Research Board, 2010) (HCM) methodology. If any unsignalized intersection is projected to operate at LOS E or F under Future with Project conditions, then the intersection should be evaluated for the need to install a traffic signal by conducting a signal warrant analysis.

While LADOT provides no impact thresholds for unsignalized intersections, there are analysis criteria and impact thresholds identified in *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles* (City of Los Angeles, 2006) (L.A. CEQA Thresholds Guide). Similar to the LADOT guidelines, the L.A. CEQA Thresholds Guide requires that average vehicular delay be assessed using the HCM methodology to determine level of service (LOS).

If any intersection is found to operate at LOS C, D, E, or F, then additional analysis is conducted using the Critical Movement Analysis (CMA) methodology that LADOT prescribes for the analysis of signalized intersections, with a reduced intersection capacity of 1,200 vehicles per hour per lane to simulate stop-controlled conditions. The results of the CMA analysis are used to identify potential significant impacts using the same sliding scale that is used for signalized intersections according to LADOT criteria. In this scale, a project's maximum allowable increase in volume-to-capacity (V/C) ratio at an intersection decreases as the LOS worsens. For an intersection operating at LOS C under Future with Project conditions, a significant impact is identified if the V/C ratio increases by 0.040 or more. For intersections operating at LOS D under Future with Project conditions, a significant impact is identified if the V/C ratio increases by 0.020 or more. For intersections operating at LOS E or F under Future with Project conditions, a significant impact is identified if the V/C ratio

increases by 0.010 or more. There are no applicable requirements or thresholds to analyze queuing or queue lengths on alleyways.

This supplemental analysis was conducted of the unsignalized intersection of the alleyway forming the eastern border of the Project site & Constellation Boulevard. Afternoon peak hour traffic counts, provided in the Attachment, were conducted at this intersection in September 2013 and were used for this analysis. Because the alley provides access to several office buildings, and would also provide access to the Century City Center project (primarily an office building), traffic at this intersection is heavily skewed toward morning arrivals into the alley and afternoon departures out of the alley. Because turns from higher-volume, uncontrolled Constellation Boulevard to the low-volume alley are not substantially delayed while stop-controlled turns from the alley onto higher-volume Constellation Boulevard may experience delay, the afternoon peak hour represents the worst case operating condition for this intersection and it is unnecessary to conduct analysis of the morning peak hour.

It is important to note that this supplemental analysis conservatively uses worst-case vehicular delay to estimate LOS, though the L.A. CEQA Thresholds Guide specifies that the less-conservative average vehicular delay may be used to assess LOS for all unsignalized intersections. At two-way stop-controlled intersections such as the intersection of the alley & Constellation Boulevard, the worst-case delay is experienced by vehicles attempting to turn from the alley onto Constellation Boulevard. On the other hand, the average delay is weighted heavily by the larger number of vehicles travelling east and west on Constellation Boulevard, which experience no delay at all.

The supplemental analysis was conducted for years 2011, 2015, and 2021 for Alternative 9 (the Enhanced Retail Alternative), which was adopted by the City Planning Commission at its June 12, 2014 hearing. The analysis was conducted under "no Project" conditions and "with Project" conditions considering trip generation using the Empirical Rate, the Economy Adjustment Rate, and the Published Rates for Alternative 9 as provided in Section 3.1.1 of the Final Subsequent EIR. Further, for all "with Project" conditions, two possible Project access configurations were examined.

In the first configuration, as shown in Figure 1, the primary Project driveway on Constellation Boulevard (west of the alley) would operate as a full-access, signalized driveway allowing left and right-turns into and out of the Project site (Full Access Driveway). In the second configuration, as shown in Figure 2, the primary Project driveway would be restricted to right-turns in and out only via a physical median on Constellation Boulevard that would serve to restrict left turns to and from the Project driveway while maintaining full access to 2000 Avenue of the Stars on the south side of Constellation Boulevard (RIRO Driveway).

As detailed above, both the LADOT analysis for potential signalization of unsignalized intersections and the L.A. CEQA Thresholds Guide analysis for potential significant traffic impacts begin with an HCM analysis to calculate delay at the subject intersection. The HCM analysis was conducted for each of the scenarios described above and is summarized in Table 1.

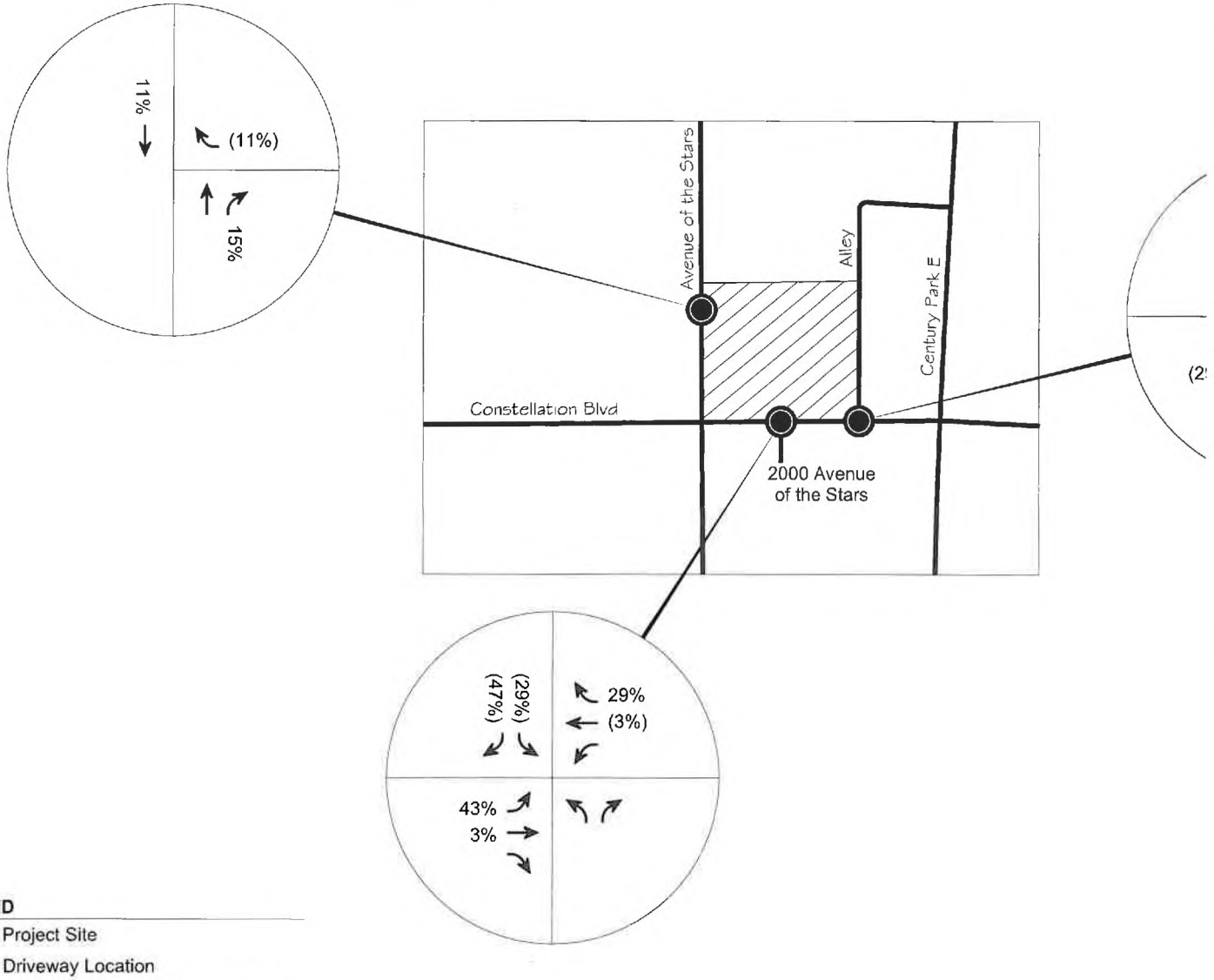
As shown in Table 1, under conditions without the Project, the intersection would operate at LOS B in years 2011, 2015, and 2021. With Alternative 9 in place, it would continue to operate at LOS B using the trip generation under the Empirical Rate or Economy Adjustment Rate in

year 2011 with the Full Access Driveway configuration. In all other analysis years and trip generation scenarios, as well as all scenarios involving the RIRO Driveway, the intersection would operate at LOS C with Alternative 9. It should be noted that if the LOS were based on less conservative average delay (see discussion above), the intersection would operate at LOS A using each trip generation rate and under each analysis year.

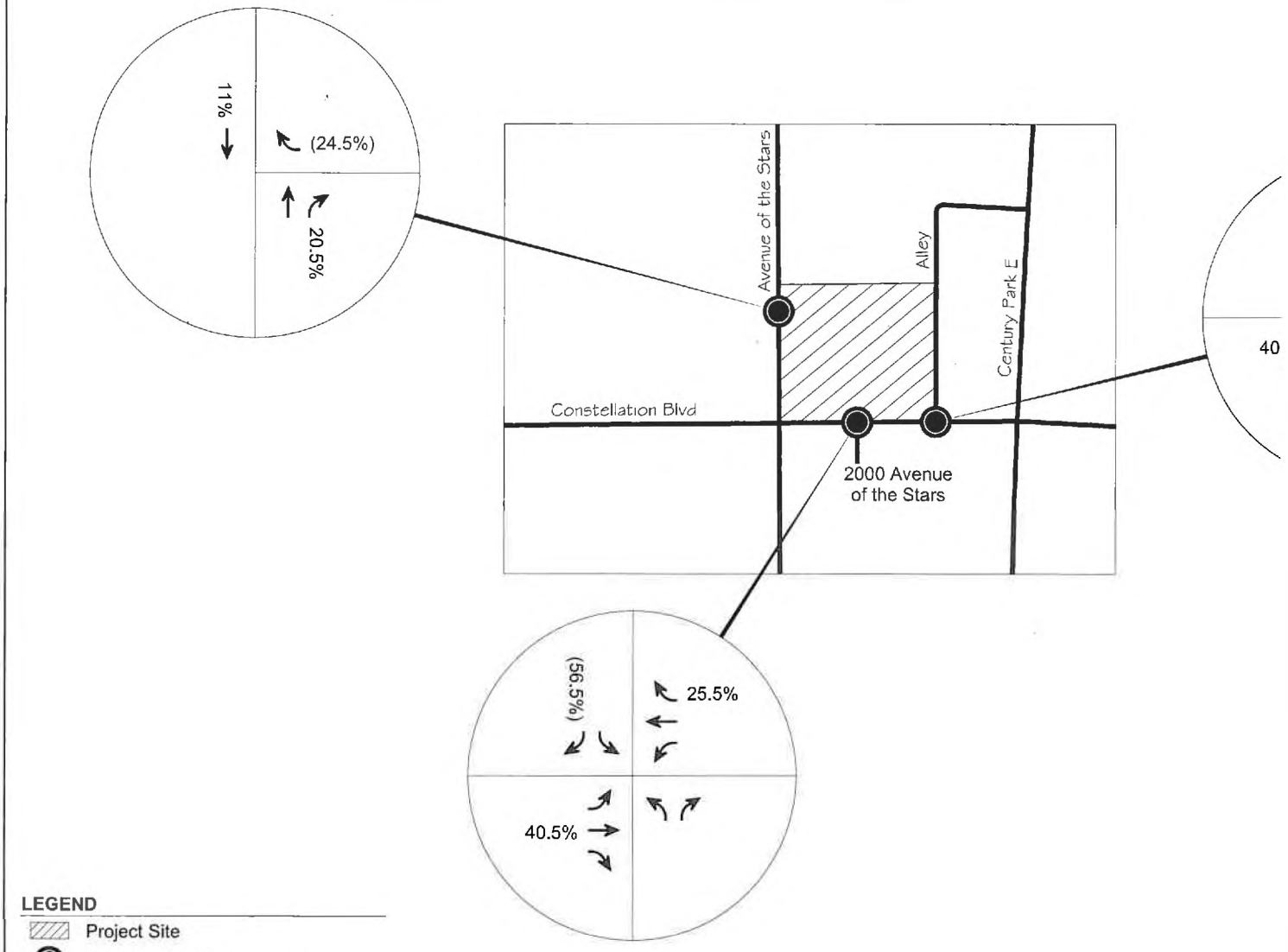
Based on the results, the worst-case operating LOS, with Alternative 9 in place, is projected to be LOS C. Based on LADOT guidelines, an unsignalized intersection should be further analyzed using signal warrants in the event that an unsignalized intersection is projected to operate at LOS E or F based on the HCM methodology. Since the intersection is projected to operate at LOS C, no further analysis is required to determine the need for signalization based on LADOT guidelines. The intersection does not require signalization pursuant to LADOT criteria.

The L.A. CEQA Thresholds Guide bases the need for further analysis of an unsignalized intersection on whether or not that intersection is projected to operate at LOS C, D, E, or F under Future with Project conditions *based on the peak hour average vehicular delay through the intersection.* Table 1 reports LOS based on the worst-case delay, which is a significantly more conservative metric as discussed above. Nonetheless, based on that conservative metric the intersection would operate at LOS C, which would require additional analysis of the intersection using the CMA methodology and applying LADOT's signalized intersection significant impact thresholds.

Table 2 summarizes the results of the intersection analysis using the CMA methodology with a reduced capacity of 1,200 vehicles per hour per lane to simulate stop-controlled conditions. As Table 2 shows, based on the CMA methodology, the intersection would operate at LOS A under all analysis scenarios – both the Full Access Driveway and RIRO Driveway configurations, each of the three trip generation rates, and under each analysis year. As described above, based on LADOT significant impact criteria, a project would not result in a significant intersection impact under the CMA methodology unless it operated at LOS C at a minimum. Since the intersection would operate at LOS A under the CMA methodology in the worst-case scenario with the addition of Alternative 9 traffic, no significant traffic impact would occur.



DRIVEWAY TRIP DISTRIBUTION
WITH FULL ACCESS DRIVEWAY ON CONSTELLATION BOULEVARD



DRIVEWAY TRIP DISTRIBUTION
WITH RIGHT-IN, RIGHT-OUT DRIVEWAY ON CONSTELLATION BOULEVARD

Sep 29, 2014
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TABLE 1
LEVEL OF SERVICE SUMMARY - ALLEY & CONSTELLATION BOULEVARD
HIGHWAY CAPACITY MANUAL METHODOLOGY

Analysis Scenario	Full-Access Driveway			Right-In, Right-Out Driveway		
	Year 2011	Year 2015	Year 2021	Year 2011	Year 2015	Year 2021
No Project						
Average Delay	4.1	4.1	4.0	4.1	4.1	4.0
Worst-Case Delay	12.7	12.8	13.0	12.7	12.8	13.0
[a] *Level of Service*	B	B	B	B	B	B
Empirical Rates						
Average Delay	4.7	4.7	4.7	5.8	5.8	5.8
Worst-Case Delay	14.8	15.0	15.4	16.0	16.3	16.8
[a] *Level of Service*	B	C	C	C	C	C
Economy Adjustment						
Average Delay	4.7	4.7	4.7	5.9	5.9	5.9
Worst-Case Delay	15.0	15.2	15.6	16.3	16.6	17.1
[a] *Level of Service*	B	C	C	C	C	C
Published Rates						
Average Delay	5.2	5.2	5.2	7.7	7.8	7.9
Worst-Case Delay	16.9	17.2	17.8	21.0	21.6	22.6
[a] *Level of Service*	C	C	C	C	C	C

[a] - Level of service is based on worst-case delay.

TABLE 2
LEVEL OF SERVICE SUMMARY - ALLEY & CONSTELLATION BOULEVARD
CRITICAL MOVEMENT ANALYSIS METHODOLOGY

Analysis Scenario	Full-Access Driveway			Right-In, Right-Out Driveway		
	Year 2011	Year 2015	Year 2021	Year 2011	Year 2015	Year 2021
No Project						
V/C Ratio	0.407	0.419	0.438	0.407	0.419	0.438
Level of Service	A	A	A	A	A	A
Empirical Rates						
V/C Ratio	0.483	0.495	0.514	0.459	0.472	0.491
Level of Service	A	A	A	A	A	A
Economy Adjustment						
V/C Ratio	0.487	0.499	0.518	0.462	0.474	0.493
Level of Service	A	A	A	A	A	A
Published Rates						
V/C Ratio	0.521	0.533	0.553	0.493	0.504	0.520
Level of Service	A	A	A	A	A	A

Attachment

Afternoon Peak Hour Traffic Counts

WILTEC

Phone: (626) 564-1944 Fax: (626) 564-0969

INTERSECTION TURNING MOVEMENT COUNT SUMMARY

CLIENT:		GIBSON TRANSPORTATION CONSULTING, INC.
PROJECT:		CENTURY CITY TRAFFIC COUNTS
DATE:		TUESDAY, SEPTEMBER 10, 2013
PERIOD:		3:00 PM TO 6:00 PM
INTERSECTION:	N/S	ALLEY WEST OF CENTURY PARK EAST
	E/W	CONSTELLATION BLVD
CITY:		CENTURY CITY

15 MIN COUNTS

PERIOD	1 SBRT	2 SBTH	3 SBLT	4 WBRT	5 WBTH	6 WBLT	7 NBRT	8 NBTH	9 NBLT	10 EBRT	11 EBTH	12 EBLT	TOTAL
300-315	10	0	14	2	58	0	0	0	0	0	75	8	167
315-330	13	0	13	3	41	0	0	0	0	0	82	3	155
330-345	22	0	8	2	50	0	0	0	0	0	98	2	182
345-400	13	0	12	5	65	0	0	0	0	0	86	9	190
400-415	33	0	13	1	43	0	0	0	0	0	126	8	224
415-430	24	0	17	2	36	0	0	0	0	0	86	7	172
430-445	45	0	28	5	49	0	0	0	0	0	93	6	226
445-500	49	0	30	4	52	0	0	0	0	0	95	5	235
500-515	71	0	11	5	62	0	0	0	0	0	105	4	258
515-530	51	0	9	3	65	0	0	0	0	0	95	4	227
530-545	51	0	10	3	45	0	0	0	0	0	90	3	202
545-600	40	0	4	1	44	0	0	0	0	0	90	2	181

HOUR TOTALS

TIME	1 SBRT	2 SBTH	3 SBLT	4 WBRT	5 WBTH	6 WBLT	7 NBRT	8 NBTH	9 NBLT	10 EBRT	11 EBTH	12 EBLT	TOTAL
300-400	58	0	47	12	214	0	0	0	0	0	341	22	694
315-415	81	0	46	11	199	0	0	0	0	0	392	22	751
330-430	92	0	50	10	194	0	0	0	0	0	396	26	768
345-445	115	0	70	13	193	0	0	0	0	0	391	30	812
400-500	151	0	88	12	180	0	0	0	0	0	400	26	857
415-515	189	0	86	16	199	0	0	0	0	0	379	22	891
430-530	216	0	78	17	228	0	0	0	0	0	388	19	946
445-545	222	0	60	15	224	0	0	0	0	0	385	16	922
500-600	213	0	34	12	216	0	0	0	0	0	380	13	868