
ADDENDUM TO THE ENVIRONMENTAL IMPACT REPORT FOR THE NEW CENTURY PLAN PROJECT

I. Introduction

This document is an Addendum to the Environmental Impact Report (EIR) (State Clearinghouse No. 2006061096) for the New Century Plan Project, which was certified by the City of Los Angeles (City) in June 2009.

The New Century Plan Project, approved by the City in 2009 (Approved Project), proposes to create an integrated center within the Century City community by providing a broad array of shopping and dining choices, entertainment opportunities, outdoor spaces, and amenities within an approximately 22-acre site, including the existing Westfield Century City Shopping Center (Shopping Center) and two adjacent office buildings. As described in more detail below, upon completion of the Approved Project, an addition of an estimated 358,881 square feet of Shopping Center space, 106,523 square feet of new office uses and approximately 262 multi-family residential apartments or condominium units will be provided within the Project Site.

Since completion of the Final EIR in 2009, visual observations and surveys of the Shopping Center have found that substantial parking intrusion by non-patron motorists occurs within the Shopping Center parking garage. As described in detail in the Parking Management Report (Parking Report) provided as Appendix A, motorists have been observed exiting and then immediately reentering the Shopping Center parking structure to restart a new three hour period of free parking. These motorists are reducing the available parking supply for mall patrons and generating additional unnecessary vehicle trips at the Shopping Center. Based on the results of on-site surveys and the widespread public noticing of free Shopping Center parking, the Parking Report concludes that the free-three hour parking and reduced parking rates provided at the Shopping Center as compared to nearby office buildings are encouraging motorists related to other nearby Century City uses to park within the Shopping Center garage. In addition, the development of future projects in the vicinity of the Shopping Center, which would likely include fee-based parking facilities, would also contribute to additional parking intrusion within the Shopping Center parking garage. Moreover, based on the proximity of the proposed Westside Subway Extension to the Shopping Center, there is a potential for persons to utilize the Shopping Center garage as a free park and ride facility for the subway. As such, the purpose of this Addendum is to assess potential environmental impacts in the event changes occur to

the Shopping Center's current parking fee structure to bring it in line with other shopping centers in the area. Specifically, the Addendum analyzes potential changes to the conditions of approval for the New Century Plan to eliminate the free short-term parking (i.e., three hours free) and to restructure the parking rates within the Shopping Center to be similar to the parking rates of comparable shopping centers in Los Angeles (the Modified Project). The condition requiring three hours of free parking was a holdover from a two decade-old conditional use approval, and is no longer consistent with best parking management practices or local and regional parking policies.

The purpose of this Addendum is to determine whether the potential implementation of the Modified Project would result in any new significant environmental impacts that were not identified in the EIR or whether the previously identified significant impacts would be substantially more severe under the Modified Project. The New Century Plan EIR is hereby incorporated herein by reference.

II. Background

Typical of most shopping centers, the Applicant continuously reviews its parking supply to ensure that effective use of parking is available for patrons. As part of these efforts, studies of on-and off-site parking intrusion were recently conducted.

The Shopping Center provides free parking for the first three hours and much less expensive parking thereafter in comparison to parking rates set for other local buildings, which is commonly known to visitors and businesses in the Century City area. In fact, as discussed in the Parking Report, the Project Site provides the only free parking in Century City and this free parking is often advertised for use by nearby businesses. See Appendix A of the Parking Report for numerous examples of Century City businesses and events directing visitors at the mall for free. Visual observations found that area employees unrelated to the Shopping Center, service vendors, special event attendees and others park in the Shopping Center parking structure and then leave the site on foot to travel to other local destinations.

A detailed parking intrusion survey completed for the Shopping Center, included in Appendix A, found that substantial on-site parking intrusion occurs due to motorists taking advantage of the three free hours of parking provided at the Shopping Center. Specifically, during one survey day for a period of five hours (7:00 A.M. to 12:00 P.M.), 181 motorists were observed exiting and then immediately reentering the Shopping Center parking structure to restart a new three hour period of free parking in order to get six hours of free parking. These 181 vehicles were documented based on the license plate surveys, which could have included Shopping Center employees. As such, intercept (interviews) surveys were also conducted that found that of the 132 persons interviewed during the survey period from 7:00 A.M. to 12:00 P.M., 124 persons (94

percent) were unrelated to the Shopping Center. The Parking Report concluded that these motorists are contributing to less parking availability for Shopping Center patrons, parking congestion within the Shopping Center parking structure, and additional unnecessary vehicle trips on the local street system due to patrons circulating in search of parking spaces occupied by parking intruders, and intruders exiting and immediately reentering the Shopping Center. As discussed further below, based on this substantial parking intrusion that occurs on-site, this Addendum analyzes potential environmental impacts in the event future modifications are made to the Shopping Center's parking program to reduce parking intrusion at the Shopping Center.

The Applicant also commissioned a study of off-site parking intrusion to determine whether off-site parking intrusion by Shopping Center employees and patrons occurs. As described in detail in the Parking Report, detailed surveys of the residential areas to the west (Tract 7260) and north (Comstock Hills) of the Project Site were conducted, as these are the only neighborhoods with immediate adjacency to the mall. During the weekday periods at the surveyed locations within the neighborhood to the west, no Shopping Center-related parking intrusion occurred. During the weekend survey period, four motorists determined to be Shopping Center-related parkers were found to be illegally parked within the neighborhood to the west. In addition, during the weekday and weekend survey periods, one motorist within the residential area to the north was determined to be a Shopping Center-related parker. In the context of the 2,630 parking spaces currently provided within the Project Site, this amount of parking intrusion is minimal.

III. CEQA Authority for an Addendum

The California Environmental Quality Act (CEQA) and CEQA Guidelines establish the type of environmental documentation that is required when changes to a project occur after an EIR is certified. Section 15164 (a) of the CEQA Guidelines states that:

"The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred."

Section 15162 of the CEQA Guidelines requires a Subsequent EIR when an MND has already been adopted or an EIR has been certified and one or more of the following circumstances exist:

1. Substantial changes are proposed in the project, which will require major revisions of the previous EIR or negative declaration due to the involvement

of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2. Substantial changes occur with respect to the circumstances under which the project is undertaken, which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration,
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR,
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative, or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Likewise, California Public Resources Code ("PRC") Section 21166 states that unless one or more of the following events occur, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency:

- Substantial changes are proposed in the project, which will require major revisions of the environmental impact report;
- Substantial changes occur with respect to the circumstances under which the project is being undertaken, which will require major revisions in the environmental impact report; or
- New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.

As demonstrated by the analysis herein, the Modified Project would not result in any additional significant impacts, nor would it substantially increase the severity of previously anticipated significant impacts. Therefore the Modified Project does not meet the requirements for preparation of a Subsequent EIR pursuant to Section 15162 of the CEQA Guidelines. Rather, all of the impacts associated with the Modified Project are within the envelope of impacts addressed in the certified EIR.

IV. Project Description

A. Approved Project

The Approved Project proposes to create an integrated center within the Century City community by providing a broad array of shopping and dining choices, entertainment opportunities, outdoor spaces, and amenities within an approximately 22-acre site, including the existing Shopping Center and two adjacent office buildings. Specifically, existing buildings and outdoor areas within the Shopping Center will be reconfigured or renovated to provide for new retail and restaurant spaces, along with landscaping and open space amenities. In addition, the Approved Project will remove two existing office buildings that together comprise approximately 360,964 square feet adjacent to the Shopping Center, and replace them with new residential uses, Shopping Center uses, office uses and parking facilities, all of which would be physically integrated with the existing Shopping Center. Upon completion, an addition of an estimated 358,881 square feet of Shopping Center space, 106,523 square feet of new office uses and approximately 262 multi-family residential apartments or condominium units will be provided within the Project Site. In addition, upon buildout, the Shopping Center will have a sitewide total of 1,192,274 square feet of Shopping Center uses, including existing and proposed retail, restaurant, and cinema uses. When accounting for the existing commercial uses to be removed, the Approved Project will result in a net increase of approximately 104,440 square feet of commercial uses.

At build-out, the Approved Project will provide a total of approximately 4,529 parking spaces on-site. These spaces will be collectively located within the existing semi-subterranean parking levels below the shopping center, the proposed rooftop parking deck above the Shopping Center, the proposed above and below ground parking structure at 1930 Century Park West, and within the proposed newly expanded and reconfigured subterranean parking structure at 1801 Avenue of the Stars.

As previously described, the Approved Project incorporated several of the conditions from a more than two decade-old conditional use approval. This 1988 Case No. ZA 87-0535-CUB-PA2 included the following conditions, which were incorporated into Condition 28 of the Approved Project's conditions of approval:

“8. That three hours of validated free parking shall be provided for patrons during all hours of operation and that provisions shall be made for additional, multiple free validations. Policies and rates for employees of the restaurant and food court lessees shall be on the same basis as policies and rates for other Shopping Center employees.”

“10. That all restaurants and food court lessees, if engaged in public advertising, whether written or oral, shall include reference in any advertisement to the fact that free validated parking is available on-site to patrons. In addition, all restaurants and food court lessees shall post signs that validated free parking is available to patrons.”

In addition, as part of the 2009 approval, the Applicant is also required to monitor parking conditions on an annual basis, implement transportation demand management measures, and contribute monetarily to the Century City Transportation Management Organization.

B. Modified Project

As described above, substantial parking intrusion occurs on-site that affects the parking available to Shopping Center patrons. As discussed in the Parking Report, destinations such as the Westfield Century City Shopping Center that offer free parking in an area that generally charges for parking, are at a significant disadvantage in terms of their ability to reserve parking for their customers. Bringing the Shopping Center's parking pricing in line with area and best practice norms for similar retail shopping centers is critical to resolving this situation effectively.

As discussed in detail in the Parking Report, parking expert Nelson\Nygaard has recommended that the Applicant eliminate its free short-term parking. Nelson\Nygaard concludes that the elimination of free short-term parking would: (1) address the substantial parking intrusion that occurs within the Project Site; (2) be in keeping with the parking practices of other similar Shopping Centers; (3) reflect local and regional policies related to parking management, vehicle trip reduction, and a reduction in vehicle emissions by encouraging non-car access to the shopping center, including access provided by planned transit improvements such as the planned Subway to the Sea; and (4) be technically feasible compared to industry standards. Based on the analysis set forth in the Parking Report, this Addendum assesses potential environmental impacts in the event free parking is eliminated and the parking program is restructured at the Project Site. Thus, the Addendum analyzes the following potential modifications to Conditions 8 and 10 above :

Condition 8 - That parking shall be provided at reasonable rates reflecting market prices. ~~three hours of validated free parking shall be provided for patrons during all hours of operation and that provisions shall be made for additional, multiple free validations.~~ Policies and rates for employees of the restaurant and food court lessees shall be on the same basis as policies and rates for other Shopping Center employees.

[Deleted] Condition 10 - That all restaurants and food court lessees, if engaged in public advertising, whether written or oral, shall include reference in any advertisement to the fact that free validated parking is available to on-site patrons. In addition, all restaurants and food court lessees shall post signs that free validated parking is available to patrons.

As discussed in the Parking Report, parking intrusion/spillover problems for Shopping Center employers or patrons parking on nearby residential streets should be non-existent due to the existing residential permit districts (and potential implementation of improvements to the permit program) and the Applicant's policies regarding employee parking.

The Applicant currently prohibits all employees from parking in adjacent neighborhoods. The license plate numbers of all employees are also recorded by the Applicant and held on file in the event that a complaint is made against an employee for parking intrusion.

The Applicant has also committed to employ the following policies and strategies as part of the Modified Project to ensure successful implementation of the proposed parking program:

- Utilize revenue generated by the modified parking rates for other access and parking improvements, such as:
 - Paying for a full-time Community Liaison/Parking Ombudsman in order to keep nearby residential communities informed on various matters and provide an open line of communication. The Community Liaison/Parking Ombudsman will also more efficiently manage parking and enforce changes that the Applicant will make to reduce parking intrusion both on-site and off-site. The parking ombudsman will be responsible for enforcing employee parking rules, the opening and closing of Shopping Center public driveways, etc. The parking ombudsman will also address any complaints from the public regarding neighborhood parking intrusion or on-site parking intrusion. The telephone number of the

parking ombudsman will be disseminated to the surrounding communities. For example, should a community member notice a shopping center employee parking in their neighborhood, they will be able to notify the ombudsman of the intrusion, as well as request enforcement if it was determined that the parker was attributable to the shopping center through the employee parking registration information on file. The parking ombudsman could also enforce the completion of the Westfield Century City Monthly Parking Agreement with mall tenants. All violations will be noted by the ombudsman and any repeat violations could be grounds for termination of employment.

- Enhance the existing Westfield Park Assist System. Park Assist is a state-of-the-art electronic management system that directs customers and visitors to the nearest available parking space using messaging signs and light indicators. The system utilizes real-time sensor networks that detect the presence of vehicles in each parking space and directs motorists to vacant spaces using the electronic messaging signs and LED indicators (i.e., red light, green light indicators) above each parking space.
- Work with the City of Los Angeles to ensure that the existing residential permit program as currently implemented in Tract 7260 and Comstock Hills reflects current best practices to prevent parking spillover problems (e.g., all streets are covered, hours of regulation are appropriate for evolving land uses with evening peaks, etc.) and make adjustments as necessary.
- Work with Tract 7260, Comstock Hills and City representatives to ensure that enforcement of the existing residential permit program occurs.
- Continue to pursue shared parking opportunities off-site, potentially in tandem with on-site valet, to take advantage of the large surplus of parking capacity nearby through lease agreements.
- Continue to prioritize site planning and design strategies in the future New Century Plan project that supports safe and convenient transit, bicycle and pedestrian access and amenities (e.g., ground-floor, street-oriented active uses, minimal driveway curb cuts to reduce sidewalk conflicts, bicycle stations, pedestrian-scaled lighting and landscaping, etc). The New Century Plan project that was approved in year 2009 has incorporated design features to facilitate transit and bicycle usage as well as walkability.

- Continue the outreach program whereby all employee parking options and alternative transportation modes are fully emphasized in concert with the Century City Transportation Management Organization (TMO).
- The Applicant will strategically close site driveways (i.e., through installation of chains or other cost effective means/technologies) prior to the opening of the shopping center in order to further prohibit on-site parking intrusion.

V. Comparative Analysis of Modified Project Impacts

The analysis below provides a comparative analysis of the impacts of the Modified Project with those of the Approved Project as evaluated in the EIR.

A. Aesthetics/Visual Resources

As set forth in the EIR, the Approved Project would contribute to the high quality architecture of Century City and would be compatible with the urban skyline. In addition, the Approved Project would not result in substantial view blockage of any valued views from public locations. Furthermore, lighting associated with the Approved Project would not substantially alter the character of the off-site areas surrounding the Project Site and would not interfere with the performance of an off-site activity. As such, potential impacts associated with aesthetics, views, and light were determined to be less than significant by the Certified EIR. Additionally, potential impacts associated with glare from proposed buildings were determined to be less than significant with implementation of project design features and mitigation measures. Although shade/shadow impacts on residential uses were found to be less than significant, the EIR conservatively assumed that the Approved Project would result in shading impacts to the nearby golf course. No feasible mitigation measures were determined feasible to mitigate this impact.

The Modified Project would not result in any physical changes to the Project as approved in 2009. Specifically, the building heights, density, architectural design, landscaping and lighting would remain the same as that originally proposed. In addition, the Modified Project would incorporate the same mitigation measures set forth in the EIR. Thus, like the Approved Project, the Modified Project would result in significant shading impacts and the remaining impacts associated with aesthetics would be less than significant or less than significant with implementation of mitigation measures. Such impacts would be within the envelope of impact set forth in the EIR.

B. Air quality

As previously described, the Modified Project would not result in any physical changes to the Approved Project and the overall amount of new building area would remain the same as that proposed under the Approved Project. Thus, construction activities and associated regional and localized construction emissions would be the same under the Modified Project. In addition, the same construction-related air quality mitigation measures set forth in the EIR would continue to be implemented with the Modified Project. Thus, similar to the Approved Project, construction-related impacts regarding regional emissions would be significant and unavoidable, while construction-related impacts regarding localized emissions, toxic emissions, and objectionable odors would be less than significant. These impacts would be within the envelope of the impact analysis addressed in the EIR.

The Modified Project would not generate an increase in vehicular trips resulting from the Project, nor would the proposed modification result in an increase in stationary sources. Rather, it is anticipated that with elimination of the on-site short-term free parking, local trips (i.e., around the shopping center) would be reduced due to a reduction in motorists exiting and immediately re-entering the shopping center so as to avoid a parking charge and a reduction in patrons circulating in search of parking spaces occupied by parking intruders. However, even with this reduction in trips, like the Approved Project, operational air quality impacts associated with regional emissions would continue to be significant and unavoidable. In addition, like the Approved Project, operational air quality impacts from local operation emissions and greenhouse gases associated with the Modified Project would be less than significant and within the envelope of the impact analysis addressed in the EIR.

C. Agricultural, Biological, and Mineral Resources

The Project Site and adjacent areas are predominantly developed with structures or paved with impervious surfaces. Existing vegetation within the Project Site is limited and consists primarily of ornamental landscaping and street trees. Thus, there are no existing or mapped agricultural resources within the Project Site. Furthermore, any street trees removed would be replaced in accordance with the City of Los Angeles Street Tree Ordinance. Additionally, the Project Site is not classified by the City of Los Angeles as an area containing significant mineral deposits, nor is the Project Site designated as an existing mineral resource extraction area by the State of California. Thus, as with the Approved Project, the Modified Project would not result in any significant impacts associated with agricultural, biological, or mineral resources and such impacts would be within the envelope of the impact analysis addressed in the Initial Study.

D. Cultural Resources

As described in the EIR, it was conservatively concluded that the 1801 Avenue of the Stars building is a potential historic resource eligible for listing in the California Register and as a City of Los Angeles Historic-Cultural Monument. As the Approved Project includes removal of the 1801 Avenue of the Stars building, the EIR determined that a substantial adverse change to a potential historical resource would occur and a significant and unavoidable impact would result even after implementation and completion of the recommended mitigation measures. As the Modified Project would not result in any physical changes to the Approved Project, impacts to historical resources would be the same as those under the Approved Project and would remain significant and unavoidable.

As evaluated in the Initial Study provided in Appendix A of the Draft EIR, a review of survey data collected and evaluated indicated that no prehistoric or historic archaeological sites have been identified within the local area and that no unique or important prehistoric or historic archaeological resources have been encountered within the Project vicinity. In addition, no known traditional burial sites or other type of cemetery uses have been identified within the Project Site or nearby vicinity. If a unique archaeological resource or human remains or related resources were discovered, work in the area would cease and such resources would be treated in accordance with Federal, State, and local regulations and guidelines. Therefore, impacts to archaeological resources and potential impacts associated with the discovery of human remains were concluded to be less than significant in the EIR. Furthermore, with implementation of the prescribed mitigation measures, potential impacts associated with the potential for discovering unrecorded, paleontological resources during excavation of the subterranean parking, in particular, would be reduced to a less than significant level.

As the Modified Project would not result in any physical changes to the Approved Project, impacts to archeological and paleontological resources and potential impacts associated with the discovery of human remains would be the same as those under the Approved Project and would be less than significant.

E. Geology and Soils

As discussed in the EIR, the Approved Project could potentially result in seismic-related impacts associated with strong ground shaking, as with most of southern California. However, with compliance with the Uniform Building Code, Los Angeles Municipal Code, and a recommended mitigation measure to ensure that adequate structural protection would be provided, impacts from strong seismic ground shaking would be less than significant. In addition, potential impacts from slope instability would be less than significant with incorporation of a mitigation measure. Furthermore, as groundwater may be encountered within a portion of the Project Site, a mitigation

measure would be implemented requiring basement levels below 25 feet below ground surface to be designed for hydrostatic pressure. With implementation of this mitigation measure, potential impacts from hydrostatic pressure would be less than significant. Other geologic hazards impacts (i.e., fault rupture, landslides, liquefaction, subsidence, tsunamis, inundation, seiche, erosion and sedimentation) were determined to be less than significant.

The Modified Project would not result in any physical changes to the proposed development or to the Project Site. In addition, all of the mitigation measures related to geology and soils set forth in the EIR would also be implemented under the Modified Project. As such, potential impacts associated with geology and soils under the Modified Project would also be reduced to less than significant levels and such impacts would be within the envelope of the impact analysis set forth in the EIR.

F. Hazards and Hazardous Materials

As set forth in the EIR, potential impacts from the use of small quantities of hazardous substances or materials during construction and operation of the Project would be less than significant with compliance with applicable laws and regulations, and manufacturer's instructions. In addition, with compliance with applicable rules and regulations and incorporation of recommended mitigation measures, potential impacts associated with polychlorinated biphenyls, asbestos-containing materials, lead-based paints, and the removal of an existing underground storage tank would be less than significant. Furthermore, potential impacts associated with the Project Site being located within a designated City of Los Angeles Methane Zone would be less than significant with compliance with applicable standards and implementation of the prescribed mitigation measures. Additionally, with compliance with Federal Aviation Administration requirements and recommendations, the Approved Project would result in a less than significant impact with regard to airport safety.

The Modified Project would not change the type of uses or increase the amount or location of development proposed by the Project. In addition, the mitigation measures proposed in the EIR would continue to be implemented under the Modified Project. As such, potential hazards impacts would continue to be less than significant with implementation of mitigation measures and regulatory requirements set forth in the EIR. Such impacts would be within the envelope of the impact analysis addressed in the EIR.

G. Hydrology and Surface Water Quality

Hydrology

As described in the EIR, the Approved Project would result in a net decrease in impermeable surfaces due to the introduction of new landscaped areas. Thus, the amount of stormwater runoff due to development of the Project Site would not increase relative to existing conditions and the current storm drain system within the adjacent streets would not be negatively affected by Project development. As the Modified Project would not change the building footprint and appropriate drainage improvements would continue to be incorporated, impacts would continue to be less than significant and such impacts would be within the envelope of impacts evaluated in the EIR.

Surface Water Quality

As set forth in the EIR, the Approved Project would not generate any new sources of polluted runoff. In addition, Project construction would occur in accordance with the requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit (Order No. 99-08-DWQ) and Best Management Practices (BMPs) and erosion control measures would be employed during Project construction to minimize the effects of erosion and reduce pollution in stormwater discharge to levels that comply with applicable water quality standards. In addition, during operation, Standard Urban Storm Water Mitigation plan (SUSMP) provisions would be implemented throughout the operational life of the Project to ensure that appropriate BMPs would be implemented to prevent erosion and minimize urban pollutants in stormwater runoff. As these regulations would continue to be implemented with the Modified Project, construction and operation impacts related to the violation of water quality standards or waste discharge requirements would be less than significant under the Modified Project. Such impacts would be within the envelope of the impacts set forth in the EIR.

H. Land Use

As discussed in the EIR, the Approved Project would not result in significant impacts associated with compatibility of mass and scale, compatibility of use, or division or isolation of an existing community. In addition, land use impacts associated with consistency with land use plans and policies would be less than significant with approval of the Project's discretionary actions.

The discretionary actions required for the Modified Project would include a Plan Approval to modify Condition 28 of CPC-2006-1913-SP-SPP-SPR-CUB-ZAD-DA which would permit a modification of the current requirement to provide three hours of free parking at the Shopping Center. However, these modifications would not result in any

physical changes to the Project. In addition, under the Modified Project, no physical changes to the Project Site would occur. Thus, impacts associated with land use compatibility, division or isolation of an existing community and consistency with land use plans and policies would be similar to those discussed in the EIR. Such impacts would be less than significant and within the envelope of impact set forth in the EIR.

I. Noise

As discussed in the EIR, although implementation of recommended mitigation measures would reduce the noise level impacts associated with construction activities to the extent practicable, project construction activities would intermittently increase the daytime noise levels at the nearest noise sensitive receptors above levels that would exceed the significance threshold. As such, the EIR concluded that noise impacts during construction of the Project would be significant and unavoidable. The Modified Project would not result in any changes to construction of the Project. In addition, the Modified Project would implement the same mitigation measures for construction set forth in the EIR. Therefore, noise impacts during construction of the Project would continue to be significant and unavoidable under the Modified Project.

With regard to operational noise impacts, the EIR found potential traffic noise impacts and operational noise associated with parking activities, mechanical equipment, loading docks and refuse collection areas, and the infrequent emergency use of a helipad to be less than significant. As the Modified Project may result in a slight decrease in local trips (i.e., around the shopping center) due to a reduction in motorists exiting and immediately re-entering the shopping center so as to avoid a parking charge and a reduction in patrons circulating in search of parking spaces occupied by parking intruders, a corresponding noise reduction from vehicular traffic and parking activities within the shopping center could also occur. As such, potential noise impacts from these sources would be reduced when compared with the Approved Project. In addition, the Modified Project would implement the prescribed operational mitigation measure set forth in the EIR. Therefore, similar to the Approved Project, operational noise impacts would be less than significant under the Modified Project and within the envelope of impacts addressed in the EIR.

J. Population and Housing

As described in the Initial Study, the proposed residential units and the corresponding residential population generated by the Approved Project would be well within the established forecasts for the Community Plan area. In addition, the Approved Project would not displace existing housing or people. Furthermore, the Approved Project would provide the necessary infrastructure connections and minor improvements to accommodate the Project residents and new infrastructure that could indirectly induce substantial population growth is not proposed. Therefore, the

Approved Project's impacts regarding population growth were concluded to be less than significant. As the Modified Project would not result in changes to the type and amount of housing proposed, impacts to population and housing associated with the Modified Project would not be increased and impacts would remain less than significant. Such impacts would be within the envelope of impacts set forth in the EIR.

K. Public Services and Recreation

As described in the EIR, with implementation of mitigation measures, impacts associated with fire protection, police protection, schools, and parks under the Approved Project would be reduced to less than significant levels. In addition, potential impacts associated with libraries under the Approved Project would be less than significant. As the Modified Project would not result in changes to the type and amount of uses or population proposed, impacts to public services associated with the Modified Project would not be increased. As such, impacts to public services would remain less than significant with the implementation of mitigation measures and such impacts would be within the envelope of impacts addressed in the EIR.

L. Traffic and Parking

To evaluate whether the proposed modification to the Approved Project would result in potential traffic and parking impacts, Linscott, Law & Greenspan, Engineers (LLG) in concert with Nelson\Nygaard Consulting Associates, Inc., reviewed potential traffic and parking conditions associated with the Modified Project as part of the Parking Report.

Traffic

As discussed in the EIR, traffic impacts at two of six significantly impacted intersections would be reduced to a less than significant level with the incorporation of mitigation measures. In addition, with implementation of a comprehensive transportation demand management (TDM) program, the significant impacts at the remaining four study intersections would be reduced to less than significant levels. However, as the level of effectiveness of the TDM program could not be formally determined at the time of Project approval (in 2009), the EIR concluded that the impacts at these four intersections would remain significant and unavoidable under the Approved Project.

The Modified Project would not result in any physical changes to the maximum amount of development or types and location of uses proposed within the Project Site. Thus, the Modified Project would not generate an increase in vehicular trips. In addition, although the overall number of trips generated to and from the Century City area would not change, it is anticipated that with elimination of the on-site short-term

free parking, a localized redistribution of vehicle trips would occur from motorists parking at their respective destinations. In addition, the Modified Project would result in a decrease in local trips due to the reduction in vehicles exiting and immediately re-entering the Shopping Center so as to avoid a parking charge and a reduction in patrons circulating in search of parking spaces occupied by parking intruders. Therefore, no significant traffic impacts are anticipated to occur under the Modified Project and such impacts would be within the envelope of impacts set forth in the EIR.

Parking

As described above, at buildout, the Approved Project proposes to provide approximately 4,529 parking spaces on-site. These parking spaces would be collectively located within the existing semi-subterranean parking levels below the shopping center, the proposed rooftop parking deck above the shopping center, the proposed above and below ground parking structure at 1930 Century Park West, and within the proposed newly expanded and reconfigured subterranean parking structure at 1801 Avenue of the Stars. As concluded in the EIR, with the proposed on-site parking supply, as well as the provision of off-site parking spaces during peak holiday periods set forth by a mitigation measure, the EIR determined that the parking supply would accommodate the Project's parking demand.

More recently, the most recent annual holiday parking report prepared by LLG in February 2012 concluded that the parking supply within Shopping Center-controlled facilities satisfied parking demand during both the peak weekday and weekend day periods during the 2011 holiday season, which included the busiest shopping days of the year. Therefore, the parking supply was determined to be sufficient and very highly utilized, and the Applicant will continue its practice of securing additional off-site parking spaces and utilization of a shuttle or taxi service during the peak holiday shopping season.

The Modified Project does not propose any physical changes to the Approved Project or the types or amounts of uses proposed. As analyzed in the Parking Report, the Modified Project is supported by local market conditions and industry standards for managing parking demand and would be consistent with local and regional policies related to parking management and vehicle trip reduction.

Furthermore, potential parking intrusion/spillover problems from Shopping Center employees or customers parking on nearby residential streets would likely be reduced or would not occur due to the existing residential permit districts (and potential implementation of improvements to the permit program as part of the Modified Project) and internal shopping center employee-parking policies. The Applicant currently prohibits all employees from parking in adjacent neighborhoods and the license plate

numbers of all employees are also recorded by the Applicant and held on file in the event that a complaint is made against an employee for parking intrusion. In addition, as described further above, the Applicant has also committed to utilize revenue generated by the modified parking rates for other access and parking improvements, such as paying for a full-time Community Liaison/Parking Ombudsman and enhance the existing Westfield Park Assist System. Moreover, the Applicant will work with the City of Los Angeles to ensure that the existing residential permit program as currently implemented in Tract 7260 and Comstock Hills reflects current best practices to prevent parking spillover problems, as well as work with Tract 7260, Comstock Hills and City representatives to ensure that enforcement of the existing residential permit program occurs. Furthermore, the Applicant will continue to: pursue shared parking opportunities off-site, potentially in tandem with on-site valet; prioritize site planning and design strategies in the future New Century Plan that supports safe and convenient transit, bicycle, and pedestrian access and amenities; and implement the outreach program whereby all employee parking options and alternative transportation modes are fully emphasized in concert with the TMO.

The Applicant will also strategically close site driveways prior to the opening of the shopping center in order to further prohibit on-site parking intrusion. Thus, under the Modified Project, parking intrusion from non-shopping center patrons would be reduced and would result in improved parking availability for shopping center patrons. With implementation of the Modified Project and Westfield's additional parking management measures, non-shopping center patrons who currently park at the Shopping Center would likely pay for parking elsewhere in Century City; employers would be encouraged to pay for employee parking; and the use of alternative modes of transportation may increase.

Based on the above, adequate parking capacity would continue to be provided under the Modified Project. In addition, with approval of the Modified Project, on-site parking intrusion from non-shopping center patrons would be reduced and would result in improved parking availability for shopping center patrons. As such, parking impacts, including intrusion into nearby neighborhoods, would be less than significant under the Modified Project, and no mitigation measures beyond those set forth in the EIR would be necessary. Such impacts would be within the envelope of impact set forth in the EIR.

M. Water Supply

As discussed in the EIR, the Approved Project would not result in significant impacts associated with domestic water supply. In addition, with implementation of a mitigation measure, potential impacts related to provision of fire flow to accommodate the Project would be reduced to a less than significant level. As the Modified Project

does not include additional uses or propose an increase in the uses proposed, potential impacts associated with water supply would continue to be less than significant and such impacts would be within the envelope of impact set forth in the EIR.

N. Wastewater

As discussed in the Initial Study included as Appendix A of the EIR, based on correspondence with the City of Los Angeles Bureau of Engineering, the sewer system in the Project area is adequately sized to serve the Approved Project. In addition, construction of the Approved Project would include all necessary sewer line improvements and connections in order to adequately connect to the existing sewer system and substantial off-site improvements would not be required. Thus, impacts associated with wastewater under the Approved Project would be less than significant. As the Modified Project does not include additional uses or propose an increase in the uses proposed, an increase in the amount of wastewater generated by the Project Site beyond that set forth in the EIR would not occur under the Modified Project. Thus, potential impacts associated with wastewater would continue to be less than significant and such impacts would be within the envelope of impact set forth in the EIR.

O. Solid Waste

As discussed in the Initial Study included as Appendix A of the EIR, potential impacts on the capacity of existing landfills in Los Angeles County associated with the solid waste generated by the Approved Project would be less than significant. Like the Approved Project, the Modified Project would comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. As the Modified Project does not include additional uses or propose an increase in the uses proposed, the Modified Project would not result in an increase in solid waste generation beyond that set forth in the EIR. Thus, potential impacts associated with solid waste would continue to be less than significant and such impacts would be within the envelope of impact set forth in the EIR.

VI. Conclusion

As demonstrated by the discussion above, impacts associated with the Modified Project would be similar to or less than the impacts addressed in the EIR. Thus, a new or greater significant impact would not result from the proposed modification in parking rates. In addition, all of the mitigation measures included as part of the EIR would continue to be implemented under the Modified Project. As all of the impacts would be within the envelope of impacts analyzed in the EIR, no additional environmental analysis of the Modified Project is necessary.