
I. INTRODUCTION/SUMMARY

A. INTRODUCTION

The purpose of this Draft Environmental Impact Report (EIR) is to inform decision-makers and the general public of the potential environmental impacts resulting from the proposed development of the St. Regis Hotel (the “proposed project”) site located at 2055 Avenue of the Stars within the Century City area of the City of Los Angeles. The project applicant is Avenue of the Stars Associates, LLC, located at 60 Columbus Circle, New York, New York 10023. A description of the proposed project is provided in Section III (Project Description) of this Draft EIR.

The proposed project will require certain discretionary approvals by the City of Los Angeles (the “City”) and other governmental agencies. Therefore, the proposed project is subject to environmental review requirements under the California Environmental Quality Act (CEQA).¹ The City of Los Angeles Department of City Planning (the “Planning Department”) is the Lead Agency under CEQA for the proposed project.

As described in Section 15121 (a) and 15362 of the State CEQA Guidelines,² an EIR is an informational document which will inform public agency decision-makers and the public of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The purpose of this Draft EIR, therefore, is to focus the discussion on those potential effects on the environment of the proposed project which the Lead Agency has determined may be significant. In addition, feasible mitigation measures are recommended, when applicable, that could reduce significant environmental impacts or avoid significant environmental impacts.

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

An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

¹ Public Resources Code Sections 21000-21178.

² California Code of Regulations Title 14, Chapter 3, Sections 15000-15387.

Notice of Preparation

Comments from identified responsible and trustee agencies, as well as interested parties on the scope of the Draft EIR, were solicited through a Notice of Preparation (NOP) process. The NOP for the Draft EIR was circulated for a 30-day review period starting on August 8, 2005 and ending on September 7, 2005. Refer to Appendix A to this Draft EIR for a copy of the NOP and written comments submitted to the Planning Department in response to the NOP.

Environmental Issues to be Analyzed in the Draft EIR

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

- Aesthetics
- Air Quality
- Biological Resources (Trees)
- Cultural Resources (Paleontological and Archaeological Resources)
- Energy Conservation
- Geology and Soils
- Hazards and Hazardous Materials
- Land Use Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Transportation and Traffic
- Utilities and Service Systems

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

Environmental Review Process

This Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for 50 calendar days. Public hearings on the proposed project will be held during the review period. Notice of time and location will be published prior to the public hearing date. All comments or questions about the Draft EIR should be addressed to:

Jonathan Riker
City of Los Angeles Department of City Planning
200 North Spring Street, 7th Floor
Los Angeles, California 90012

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

Organization of Draft EIR

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

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

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

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

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

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

Section VI. Alternatives to the Proposed Project: This section includes an analysis of a reasonable range of alternatives to the proposed project. The range of alternatives selected is based on their ability to

feasibly attain most of the basic objectives of the project and that would avoid or substantially lessen any of the significant effects of the project.

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

Section VIII. References: This section includes a list of written materials used in the preparation of this Draft EIR.

Section IX. List of Acronyms and Abbreviations: This section provides definitions for all of the acronyms and abbreviations used in this Draft EIR.

B. PROPOSED PROJECT

The proposed project would involve the development of 147 luxury residential condominium units with associated amenities in one high-rise structure (see Figure III-1, Proposed Site Plan). The proposed project would include roughly 581,000 square feet of Floor Area, and would be approximately 480 feet in height and 40 stories. The condominium units would range in size from 2,200 square feet to 6,000 square feet (excluding the penthouse unit(s)). The 147 condominium units would include 60 two-bedroom units, 76 three-bedroom units, and 11 four-bedroom units.

The proposed project would include various luxury resident-only amenities, such as a business center, screening room, gym, concierge services, valet parking, outdoor swimming pool, spa and deck, and a private garden with barbeques, sitting areas, and walking paths. In addition to the resident-only amenities, the proposed project would incorporate additional amenities that include a 7,000-square-foot restaurant and either: (a) 27,000 square feet of resident-focused specialty uses; or (b) a 43,000-square-foot private membership facility.

The existing St. Regis Hotel would be removed with the development of the proposed project.

C. AREAS OF CONTROVERSY

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

- **Air Quality** – Concerns were raised regarding potential air pollutants that may be generated during the construction and operation of the proposed project. In addition, concerns were raised regarding cumulative air quality impacts during construction activities. These issues are addressed in Section IV.C (Air Quality).
- **Noise** – Concerns were raised regarding potential noise from construction-related traffic and operation of the proposed restaurant on adjacent residences. These issues are addressed in Section IV.K (Noise).

- **Aesthetics** – Concerns were raised regarding potential shadows cast upon adjacent residences. This issue is addressed in Section IV.B.1 (Shade/Shadow).
- **Geology** – Concerns were raised regarding seismic hazards. This issue is addressed in Section IV.G (Geology and Soils).
- **Public Services** – Concerns were raised regarding potential impacts to schools, police protection services, and fire protection services. These issues are addressed in Section IV.M (Public Services).

D. ISSUES TO BE RESOLVED

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

E. ALTERNATIVES

This Draft EIR considers a range of alternatives to the proposed project to provide informed decision-making in accordance with Section 15126.6 of the State CEQA Guidelines. The alternatives analyzed in this Draft EIR include: (A) No Project; (B) Entertainment Complex; (C) Office Building; and (D) Reduced Density Residential.

Alternative A: No Project

Under the No Project Alternative, the proposed project would not be constructed and the former St. Regis Hotel would continue to occupy the project site and would be operational. The banquet and conference facilities that were operational with the 297-room former hotel would continue to be operational with the implementation of the No Project Alternative.

Alternative B: Entertainment Complex

Alternative B would include the demolition of the former St. Regis Hotel and the development of a building with a 3,000-seat live theater and 10,000 square feet of restaurant/banquet space. The building would be four stories and approximately 50 feet in height. The building would have a tiered appearance, with the first level larger than upper levels. Parking would be provided in several levels of subterranean parking, as well as at the offsite parking structure to the west of the site. The building footprint under Alternative B would be substantially larger than the proposed project, resulting in proportionally less landscaped area and open space.

Alternative C: Office Building

Alternative C would include the demolition of the former St. Regis Hotel and the development of a 250,000-square-foot office building on the project site.

The office building under Alternative C would be approximately 24 stories and approximately 300 feet in height. Each level would be approximately 18,000 square feet, and the building would be rectangular in shape. The upper 14 stories would include approximately 250,000 square feet of office space, and the lower 10 stories would include approximately 550 parking spaces. An additional 447 parking spaces would be provided offsite in the existing adjacent parking structure. Similar to the proposed project, primary access would be provided from Avenue of the Stars via the existing driveway.

Alternative D: Reduced Density

Under this Reduced Density Alternative, the density of development on the project site would be reduced by approximately 25 percent. This would result in the construction of 110 luxury residential condominium units with associated amenities in one high-rise structure. Alternative D would include approximately 5,250 square feet of restaurant space and either (a) 20,250 square feet of resident-focused specialty uses or (b) a 32,250-square-foot private membership facility.

Alternative D would include the demolition of the former St. Regis Hotel and the development of an approximately 30-story building that extends approximately 360 feet in height. The design and location of the proposed building under this alternative would be similar to the proposed project. Similar to the proposed project, approximately two acres of landscaped open space would be integrated into this alternative. Parking would be provided on several subterranean levels.

F. ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

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

Aesthetics

Shade/Shadow

Impacts

The proposed project's winter solstice shadows, similar to the existing shadows, would not cast any shadows onto multi-family residential or shadow sensitive uses located in the project vicinity. Furthermore, the proposed project would not cast any winter solstice shadows upon any detached single-family dwelling unit outside of the Specific Plan area. Therefore, as the December solstice

shadows would not cast onto any shadow sensitive uses in the project vicinity, winter solstice shadow impacts would be less than significant.

The proposed project would not cast any summer solstice shadows upon any detached single-family dwelling unit outside of the Specific Plan area. However, the summer solstice shadows would cast shadows onto multi-family residential uses located to the west and the east of the project site, which are topographically lower than the project site. Overall, the proposed summer solstice shadows would shade the surrounding multi-family residential uses to the east and west for approximately one hour longer than the existing summer solstice shadows. However, the summer solstice shadows of the proposed building would not generate any significant shadow impacts.

Light and Glare

Impacts

The project site is located in an urban area characterized by a mix of high-rise hotel, commercial, and office land uses as well as mid-rise residential land uses that are sources of nighttime lighting and daytime glare. Lighting sources from the proposed project would include interior lighting, exterior security lighting, and headlight from vehicles utilizing the project site ingress/egress and internal circulation on the site. Some of the project building materials (i.e., glass windows) would also represent potential sources of daytime glare. Overall, the proposed project would not cause excessive nighttime light that is out of character with the land uses surrounding the project site or result in a substantial increase in light that would affect sensitive land uses (i.e., residential uses) in the area.

Architectural features and facades would not be constructed of highly reflective materials. The proposed project would incorporate a variety of building materials, which would be selected and located so as to minimize the transmission of illumination from interior lights. Overall, the proposed project would not cause excessive daytime glare that is out of character with the land uses surrounding the project site or result in a substantial increase in glare that would affect sensitive land uses (i.e., residential uses) in the area.

Visual Characteristics and View Corridors

Impacts

Due to the similar height and location of the proposed building compared to the highly urbanized character of the area, the proposed building would be highly visible from all of the viewing locations previously described for the former hotel. Changes in views of the proposed project from adjacent land uses and roadways would not result in a significant impact, because the project area is already highly urbanized with a mix of hotel, commercial, office, and residential uses, including multi-story

condominium buildings. In addition, the proposed project would be consistent with the site's zoning and height requirements.

The proposed project would not result in the obstruction of any public scenic views. While the proposed project would be visible from portions of public areas such as Avenue of the Stars and Olympic Boulevard, it would not obstruct any scenic views (e.g., ocean, mountains, coastline). Further, while views of the proposed project would be available from more distant locations, the proposed building, situated similarly on the site and of somewhat greater height and similar massing as the former hotel, would not obstruct any scenic views.

The proposed project would not result in the obstruction or partial obstruction of private views from multi-family, private properties located immediately southwest and west of the project site, as the views from these private properties are already currently obstructed by the existing hotel on the project site.

The project site is located in an urbanized area characterized predominantly by hotel, commercial, office, and residential uses with varying elevations and building heights. In addition, the proposed project would be subject to design guidelines implemented through the West Los Angeles Community Plan and the Specific Plan to assure, among other things, that the proposed building would be compatible in terms of design, massing, and architectural integrity. Therefore, visual compatibility impacts would be less than significant.

Air Quality

Impacts

Construction

Construction of the proposed project may result in regional or local impacts and include airborne dust from grading, excavation and soil exporting as well as gaseous emissions from the use of heavy equipment, delivery and dirt hauling trucks, employee vehicles, and paints and coatings. As discussed in Section IV.C (Air Quality), construction related daily emissions would not exceed SCAQMD significance thresholds for ROG, NO_x, CO, SO_x and PM₁₀ during construction. Therefore, the potential air quality impact associated with the construction of the proposed project would be less than significant.

Operations

Regional Emissions

Operational emissions generated by both stationary and mobile sources would result from normal day-to-day activities on the project site after occupation. Stationary area source emissions would be generated by the consumption of natural gas for space and water heating devices as well as fireplaces, the operation of landscape maintenance equipment, and the use of consumer products. Mobile emissions would be

generated by the motor vehicles traveling to and from the project site. The proposed project would generate daily emissions of ROG, NO_x, CO, SO_x and PM₁₀, none of which would exceed the SCAQMD thresholds of significance. Therefore, impacts associated with regional operational emissions from the proposed project would be less than significant.

Local CO Concentrations

Motor vehicles are the primary source of pollutants in the project vicinity. Traffic-congested roadways and intersections have the potential to generate localized high levels of CO. For this analysis, CO concentrations were calculated based on the simplified CALINE4 screening procedure developed by the Bay Area Air Quality Management District and utilized by the SCAQMD. CO hotspots would not occur near any study intersections in the future with operation of the proposed project. Therefore, impacts related to local CO concentrations at the study intersections would be less than significant.

AQMP Consistency

The proposed project would not conflict with any of the applicable policies of the City of Los Angeles General Plan and would work to implement City policies with regard to locating residential development near pedestrian oriented facilities and infrastructure. In addition, as discussed in Section IV.I (Land Use), the project site is located within the West Los Angeles Transportation Improvement and Mitigation Specific Plan (TIMP) Area. The intent of the TIMP is to work with local jurisdictions and agencies, through planning and funding, to ultimately expedite transit flow. As discussed in Section IV.C (Air Quality), any project that reduces the amount of vehicle miles traveled (VMT) is considered consistent with the AQMP. As the proposed project would reduce the VMT, the proposed project would be consistent with the AQMP and would result in a less-than-significant impact.

Mitigation Measures

In order to address PM₁₀ emissions, the SCAQMD requires implementation of the following feasible control measures for any construction. The analysis presented in Section IV.C (Air Quality) assumes implementation of these measures as required under SCAQMD Rule 403.

- (C-1) The construction area and vicinity (500-foot radius) must be swept (preferably with water sweepers) and watered at least twice daily. Site wetting must occur often enough to maintain a 10 percent surface soil moisture content throughout all earth moving activities.
- (C-2) All paved roads, parking and staging areas must be watered at least once every two hours of active operations.
- (C-3) Site access points must be swept/washed within thirty minutes of visible dirt deposition.
- (C-4) Onsite stockpiles of debris, dirt or rusty material must be covered or watered at least twice daily.

- (C-5) All haul trucks hauling soil, sand, and other loose materials must either be covered or maintain two feet of freeboard.
- (C-6) All haul trucks must have a capacity of no less than twelve and three-quarter (12.75) cubic yards.
- (C-7) At least 80 percent of all inactive disturbed surface areas must be watered on a daily basis when there is evidence of wind drive fugitive dust.
- (C-8) Operations on any unpaved surfaces must be suspended when winds exceed 25 mph.
- (C-9) Traffic speeds on unpaved roads must be limited to 15 miles per hour.
- (C-10) Operations on any unpaved surfaces must be suspended during first and second stage smog alerts.

Biological Resources

Impacts

The topographic tree survey conducted by Fuscoe Engineering found that there are no rare, threatened, or endangered tree species currently on the project site. Considering the proposed re-use of existing trees and the absence of natural habitat, the loss of trees as a biological resource would be minimal. As such, the potential impacts associated with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, would be less than significant.

Cultural Resources

Paleontological Resources

Impacts

The proposed project would include the excavation of soil for the construction of several levels of subterranean parking. During the excavation, which would be within the older Quaternary Alluvium, there is a possibility of encountering significant vertebrate fossils. Without proper care during grading and excavation, unknown resources could be damaged or destroyed. Therefore, mitigation measures are recommended to reduce this potentially significant impact to a less-than-significant level.

Mitigation Measures

- (E-1) The project applicant shall identify a qualified paleontologist prior to any excavation, grading, or construction. The City of Los Angeles Planning Department shall approve the selected paleontologist prior to issuance of the grading permit. The project paleontologist

- shall attend the pre-grading meeting to discuss how to recognize paleontological resources in the soil during grading activities. The prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying paleontological resources or removing paleontological resources from the project site.
- (E-2) If paleontological resources are encountered during the course of site development activities, work in that area shall be halted and the project paleontologist shall be notified of the find. The project paleontologist shall have the authority to temporarily divert or redirect grading to allow time to evaluate any exposed fossil material. "Temporarily" shall be two working days for the evaluation process.
- (E-3) If the project paleontologist determines that the resource is significant, then any scientifically significant specimens shall be properly collected by the project paleontologist. During collecting activities, contextual stratigraphic data shall also be collected. The data will include lithologic descriptions, photographs, measured stratigraphic sections, and field notes.
- (E-4) Scientifically significant specimens shall be prepared to the point of identification (not exhibition), stabilized, identified, and offered for curation to a suitable repository that has a retrievable storage system.
- (E-5) The project paleontologist shall prepare a final report at the end of the earthmoving activities; the report shall include an itemized inventory of recovered fossils and appropriate stratigraphic and locality data. The project paleontologist shall send one copy of the report to the City of Los Angeles Planning Department; another copy should accompany any fossils, along with field logs and photographs, to the designated repository.

Archaeological Resources

Impacts

The integrity of the buried land surface at the project area likely is poor. The construction of subterranean facilities such as parking areas, basements, and conference rooms associated with the Century Plaza Tower/St. Regis Hotel resulted in large-scale excavations during original hotel construction. These activities no doubt caused substantial impact to native subsoil. Additionally, current site plans provided by the applicant indicate further excavations of 45 feet below current grade to accommodate subterranean parking. If utilized, prehistorically, archaeological deposits could remain intact. Yet, no known prehistoric sites exist in the immediate proximity to the project area. Based on available evidence, the potential for intact prehistoric archaeological deposits must be considered low. However, any discovery

of prehistoric archaeological remains would be considered a potentially significant archaeological discovery.

Possible human habitation during the Rancho period and site utilization by Twentieth Century Fox studios likely resulted in the formation of historical archaeological deposits within the project area. However, isolated pockets of previously undisturbed native sediments may exist. Under these circumstances historical archaeological deposits may have survived. Any discovery of Rancho period or studio period era would be considered a potentially significant archaeological discovery.

Mitigation Measures

- (E-6) If an archaeological resource is encountered, construction must be diverted and a qualified archaeologist must be consulted. An archaeologist must assess significance of the exposed archaeological discovery in accordance with California Register criteria. If a significant resource is identified during construction, the State Historic Preservation Office must be consulted regarding treatment options.

Energy Conservation

Electricity

Impacts

The proposed project is anticipated to consume approximately 4,772 kilowatt hours (kWh) per day. However, considering the electricity consumption of the former hotel, the proposed project would – result in a net decrease of 5,396 kWh per day. The electrical loads of the proposed project are less than that of the former hotel use and, thus, are within the parameters of projected electricity load for the area. Therefore, there would be an adequate power supply to serve the proposed project, and no impact would occur.

With modern energy efficient construction materials and compliance with Title 24 standards, the proposed project would be consistent with the State’s energy conservation standards and, therefore, would not conflict with adopted energy conservation plans.

Natural Gas

Impacts

The proposed project is anticipated to consume approximately 24,489 cubic feet of natural gas per day. However, considering the natural gas consumption of the former hotel, the proposed project would – result in a net decrease of 35,190 cubic feet per day. Thus, SoCalGas can accommodate the natural gas needs of the proposed project from existing pressure mains and current supply, and no impact would occur.

The proposed project would comply with the standards in Title 24 as they relate to the conservation of natural gas. Furthermore, the proposed project would use modern energy-efficient construction materials and otherwise comply with the State's energy conservation standards. Therefore, the proposed project would not conflict with adopted energy conservation plans.

Geology and Soils

Impacts

The excavation for the subterranean portion of the proposed project would extend approximately 45 feet below the ground surface (bgs). The soils at and below the proposed excavation level are generally hard or dense, and the proposed building would be supported on spread-type shallow foundations such as footings or a mat foundation. With consideration to the settlement estimation associated with the project site, the proposed building would be supported on spread footings established in the undisturbed natural soils. Any undocumented existing fill soils would be excavated and replaced as properly compacted soil. Footings would be added to reinforce the backfilled area in the third level of the basement of the existing building prior to placement of the fill. Based on the recommendations regarding the estimated settlement of the structure, the existing firm soil conditions, and the regulated use of fill soils, the proposed project would not result in risks associated with soil stability. As such, impacts associated with soil stability would be less than significant.

The near-surface clayey soils are expansive and will shrink and swell with changes in the moisture content. As recommended at least two feet of relatively non-expansive soil would be placed in these areas during the excavation associated with the proposed project. With the implementation of this project design feature, the potential impact associated with expansive soils would be less than significant.

Although project development has the potential to result in the erosion of soil during site preparation and construction activities, erosion would be reduced by implementation of appropriate erosion controls imposed during grading and through permit regulations. With implementation of the applicable grading and building permit requirements and the application of Best Management Practices, a less-than-significant impact would occur with respect to erosion or loss of topsoil.

The proposed construction would be consistent with all applicable provisions of the City of Los Angeles Building Code, as well as the seismic design criteria contained within the Uniform Building Code. Although the project site is located within 2.25 miles of the active Santa Monica Fault, and by many other faults on a regional level, the potential seismic hazard to the proposed project site would not be higher than in most areas of the City of Los Angeles or elsewhere in the region. Therefore, the risks from seismic ground shaking are considered to be less than significant.

There are no active surface fault traces identified by the State, as delineated on the most recent Alquist Priolo Earthquake Fault Zoning Map, known to be present on the project site. Therefore, the possibility of surface fault rupture affecting the project site would be considered remote, and the proposed project

would not present any adverse impacts with respect to exposing people or property to hazardous conditions resulting from rupture of a known earthquake fault on the project site. Therefore, a less-than-significant impact would occur with respect to fault rupture.

The topography at the project site is relatively flat, with a downward slope at the southwestern and southeastern boundaries of the site, towards Olympic Boulevard. The project site is not located near any foothills or mountains, and the possibility of landslides occurring on the project site is minimal. Therefore, the potential impact associated with landslides would be less than significant.

The project site is not within an area prone to liquefaction. In addition, based on the subsurface explorations conducted for the Geotechnical Report, the underlying dense to very dense soils are not prone to liquefaction. Therefore, the potential for liquefaction of the soils underlying the project site is considered to be very low, and the associated impact would be less than significant.

Mitigation Measures

- (G-1) The project shall be designed in accordance with the requirements of the latest edition of the City of Los Angeles Uniform Building Code.
- (G-2) The project shall comply with the recommendations listed on pages 4 through 21 in the Preliminary Report of Geotechnical Investigation Proposed Condominiums 2055 Avenue of the Stars, prepared by MACTEC, dated September 6, 2005.

Hazards and Hazardous Materials

Impacts

The project site contains one underground storage tank (UST) listed in the CalEPA HAZNET database and registered with the County of Los Angeles Fire Department. The 2000-gallon diesel UST is associated with the emergency power generator in the former hotel. The construction of the proposed project would involve the removal of the existing UST, and replacement with a new approximately 1,200-gallon diesel UST serving a new emergency power generator in the proposed building. Though unlikely, the removal of the existing UST and its replacement with the new UST could have the potential to expose construction workers and neighboring sensitive receptors to an accidental release of diesel emissions. With the incorporation of the mitigation measure identified below and through adherence to all applicable regulations governing USTs, potential impacts related to the existing and proposed USTs would be reduced to less-than-significant levels.

The construction of the proposed project would require the removal of the existing hotel building. The exterior wall enclosure would remain in place during “soft” demolition work (i.e., interior walls and equipment). As such, prior to mitigation, construction workers could have the potential to be exposed

to airborne Asbestos-Containing Materials (ACM) during the removal of interior wall, floor, and ceiling coverings.

The project site is located in a City of Los Angeles Methane Zone. The Methane Report prepared for the project site indicated methane concentrations above 12,500 ppmv in all of the soil-gas samples collected. These levels would therefore require Level V mitigation, based on Methane Mitigation Standards issued by the City of Los Angeles Department of Building and Safety. With the implementation of this Methane Hazard Mitigation Standard Plan, incorporated by reference into Mitigation Measure H-2, impacts related to the exposure of residents, employees, neighbors, and guests to methane gas would be reduced to less-than-significant levels.

While the proposed project would use minimal amounts of hazardous materials for routine cleaning, maintenance, and landscaping, the proposed project would not involve the routine transport, use, or disposal of substantial amounts of hazardous materials. Therefore, the potential impact associated with the routine transport, use, and disposal of hazardous materials would be less than significant.

Mitigation Measures

- (H-1) The existing 2000-gallon diesel underground storage tank (UST) located on the southern portion of the project site shall be removed in accordance with City and State regulations. The proposed new UST shall be designed and sited in accordance with all applicable regulations. The Project Applicant shall ensure that the new UST is registered with the following agencies: the County of Los Angeles Fire Department; the State Department of Toxic Substances Control; and any other applicable governmental agencies.
- (H-2) The Applicant shall follow those specifications identified in the City of Los Angeles Department of Building and Safety's Standard Plan: Methane Hazard Mitigation which is included in the Report of Methane Soil Gas Testing Proposed Condominiums, 2055 Avenue of the Stars, Century City District of Los Angeles, California, MACTEC Project 4953-05-1852, prepared by MACTEC, August 22, 2005 and incorporated as Appendix G to this Draft EIR.
- (H-3) Prior to demolition of all existing onsite structures, all ACM identified in the Asbestos Management Plan Century Plaza Hotel and Tower (2025 Avenue of the Stars) prepared by Harding Lawson Associates, December 10, 1998 and the Asbestos Documentation Review and Assessment Century Plaza Hotel and Tower (2025 Avenue of the Stars) prepared by Citadel, dated December 21, 1998 shall be abated in accordance with City and State regulations.

Land Use Planning

Impacts

The land use designation for the project site, as established by the West Los Angeles Community Plan (CPA), is Regional Commercial. This area of the CPA is designated on the CPA Land Use Diagram as a Regional Center, which is comprised of the Century City North Specific Plan and the Century City South Specific Plan areas and is subject to development restrictions based on trip generation. The proposed project is consistent with all applicable policies of the CPA.

The proposed project complies with all components of the Century City North Specific Plan. A 6 to 1 FAR is permitted for the project site providing up to approximately 1,000,000 square feet of total permitted Floor Area. The proposed project would have approximately 581,000 square feet of Floor Area, which represents approximately 58 percent of the permitted total Floor Area by the Specific Plan for the site.

In addition, the Specific Plan controls development within the Specific Plan area by allocating a certain number of "Specific Plan Trips" among its parcels, thereby limiting development that would cause trip generations to exceed those allocations. The total number of Specific Plan Trips that would be utilized by the proposed project is between 2,369.85 and 2,929.85, less than the 2,970 Specific Plan Trips allocated to the project site.

The existing zoning for the project site is C2-2-O (Commercial, Height District No. 2, Oil Drilling District O). Uses that are permitted in the C2 zone include (among others) multi-family residential land uses. The zoning code allows an unlimited height for the project site. Therefore, height is restricted only by the permitted FAR. A 6 to 1 FAR is permitted for the project site providing up to 1,000,000 square feet of total permitted Floor Area. At approximately 581,000 square feet, the proposed project would be approximately 58 percent of the permitted total Floor Area by the zoning code. In addition, residential development in the C2 zone is allowed at a density of 400 square feet of lot area per unit which would allow for the construction of up to 415 dwelling units on the project site. The project's proposed 147 condominium units are substantially fewer than the number of dwelling units permitted by zoning code. Thus, the proposed project would be consistent with the adopted City zoning classification and requirements for the project site.

The proposed project would be compatible with the land use pattern along Avenue of the Stars and Olympic Boulevard, which generally includes multi-family, high-rise apartments and condominiums, high-rise hotels, and high-rise office buildings. Furthermore, the proposed project would be subject to design guidelines implemented through the CPA and the Specific Plan to assure compatibility with surrounding development in terms of design massing and architectural integrity. Therefore, no significant impacts would result from the proposed project with regard to land use compatibility.

Mineral Resources

Impacts

The project site is located in the Beverly Hills Oilfield, and does not contain any oil wells. However, the project site is zoned for oil and mineral extraction activities. Although there are two abandoned oil wells adjacent to the project site, the site itself does not contain oil wells, nor does it currently conduct mineral extraction activities. Furthermore, the proposed project would not involve any oil or mineral extraction activities. Therefore, impacts associated with mineral resources would be less than significant.

Noise

Impacts

Construction Noise

Project development would require the use of heavy equipment for site grading and excavation, installation of utilities, paving, and building fabrication. Development activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of demolition and construction, there would be a different mix of equipment operating and noise levels would vary based on the amount of equipment in operation and the location of the activity.

The nearest sensitive receptors to the project site are the Century Woods condominiums, a low-rise, multi-family residential development located directly adjacent to the project site at the northeast corner of Century Park West and Olympic Boulevard. Project construction-related noise levels at these residences may exceed 86 dBA L_{eq} during site grading, excavation, and finishing. Based on criteria established in the Draft L.A. CEQA Threshold Guide, construction activities lasting more than one day, which would increase ambient exterior noise levels by 10 dBA or more at a noise sensitive use, may result in a potentially significant impact.

However, Section 41.40 of the LAMC regulates noise from demolition and construction activities. Exterior demolition and construction activities that generate noise are prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. Demolition and construction are prohibited on Sundays and all federal holidays. Therefore, even though demolition and construction activities would last more than one day and may have the potential to increase the ambient noise levels at the Century Woods condominiums, compliance with Section 41.40 of the LAMC would reduce this impact to a less-than-significant-level. Nevertheless, even though the construction of the proposed project would be limited to the hours outlined above, activities at the residential building may be impacted during evening hours when residents generally require a quieter environment.

Operational Noise – Ambient

Long-term noise concerns from the development of the proposed project have the potential to affect offsite locations, resulting primarily from vehicular traffic utilizing the local roadways along affected roadway segments analyzed in the project traffic study. These concerns were addressed using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108), which calculates the CNEL noise level for a particular reference set of input conditions, based on site-specific traffic volumes, distances, speeds and/or noise barriers.

Offsite locations in the vicinity would experience increased noise caused by traffic generated by the proposed project. However, the proposed project would increase local noise levels by a maximum of 0.7 dBA CNEL for the roadway segments of Olympic Boulevard; east of Century Park West, when compared with the future traffic volumes without the project. Because this is below the 3.0 dBA threshold, this impact would be less than significant.

Operational Noise - Periodic

Temporary or periodic increases in ambient noise levels could occur from the heating, ventilation, and air conditioning (HVAC) systems which would be installed in the proposed buildings. However, project development, while contributing to an overall increase in ambient noise levels in the project area, would result in land uses that are consistent with the General Plan land use designation for the project site and would generate noise levels which are similar to surrounding land uses.

Noise would also be generated by activities within the proposed subterranean parking. It is anticipated that sources of noise from the subterranean parking would include tires squealing, engines accelerating, doors slamming, and car alarms.³ Noise levels within the parking structure would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the morning and evening when the largest number of people would enter and exit the parking structure. During these times, the noise levels would range from 60 to 70 dBA L_{eq} . There would be times in the middle of the day when very little activity occurs and the noise levels average 50 to 60 dBA L_{eq} . These conditions would be similar to the existing conditions with vehicles parking at the existing onsite subterranean parking lot. In addition, exterior-to-interior reduction of newer residential units in California is generally 30 dBA or more. Therefore, impacts associated with noise generated as a result of the operation of the proposed project would be less than significant.

³ *The proposed subterranean parking would be operated by valet, which would slightly lessen noise in the subterranean parking as compared to the former St. Regis Hotel.*

Mitigation Measures

The following mitigation measures are recommended to address construction-related noise and vibration impacts:

- (K-1) All construction equipment engines shall be properly tuned and muffled according to manufacturers' specifications.
- (K-2) Noise construction activities whose specific location on the site may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest noise-sensitive land uses, and natural and/or manmade barriers (e.g., intervening construction trailers) shall be used to screen propagation of noise from such activities towards these land uses to the maximum extent possible.
- (K-3) The use of those pieces of construction equipment or construction methods with the greatest peak noise generation potential shall be minimized. Examples include the use of drills, jackhammers, and pile drivers.
- (K-4) Barriers such as plywood structures or flexible sound control curtains shall be erected along Olympic Blvd. and between the project site and Century Woods condominiums to minimize the amount of noise the residential units shall be subject to.
- (K-5) Equipment warm-up areas, water tanks, and equipment storage areas shall be located a minimum of 150 feet from the multi-family residential units.
- (K-6) Flexible sound control curtains shall be placed around drilling apparatuses and drill rigs, if sensitive receptors are located nearby.

Population and Housing

Impacts

The proposed project includes construction of 147 condominiums on 3.8 acres of previously developed land. According to the project applicant, approximately one person would occupy every bedroom in the proposed condominiums. As described in Section III, Project Description, in this Draft EIR, the proposed project would include 60 two-bedroom units, 76 three-bedroom units, and 11 four-bedroom units. Based on an average of one person per bedroom, approximately 392 people would occupy the 147 condominiums (see also Table IV.L-3 in Section IV.L, Population and Housing).

The increase in population resulting from implementation of the proposed project (392 persons) is considered minimal, as it would represent approximately six percent of the anticipated population growth in West Los Angeles between 2000 and 2010. This would not be a substantial increase, because the addition of 392 persons would be within the population projection in the West Los Angeles

Community Plan. As a result, the development of the proposed project would not directly induce substantial population growth, and impacts relating to population would be less than significant.

The proposed project would add 147 housing units to the City's housing inventory. This increase represents approximately four percent of projected housing growth within West Los Angeles between 2000 and 2010. This would not be a substantial increase, because the addition of 147 housing units to the Community's housing inventory would not exceed the projected growth rates for the Community. As a result, the development of the proposed project would not directly induce substantial housing growth, and impacts relating to housing would be less than significant.

Public Services

Fire Protection

Impacts

Project construction would not be expected to tax fire fighting and emergency services to the extent that there would be a need for new or expanded fire facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, construction-related impacts to fire protection services would be less than significant.

Based on the existing staffing levels, equipment, facilities, and most importantly, response distance from existing stations, it is expected that the LAFD could accommodate the proposed project's increased demand for fire protection service. Therefore, the proposed project would not necessitate the construction or expansion of a fire station to maintain acceptable service ratios, response times, or other performance objectives of the LAFD, and a less-than-significant impact would occur.

As discussed further in Section IV.N (Transportation and Traffic) of this Draft EIR, with the implementation of the Mitigation Measures N-1 and N-2, traffic impacts during operation of the proposed project would not result in a significant impact on any nearby roadways or intersections, which could thereby impede emergency access. Furthermore, the LAFD has made recommendations to ensure that emergency access to the project site would be sufficient and, thus, would not require the construction or expansion of fire stations or other fire protection facilities. These recommendations are listed in Mitigation Measures M.1-1 through M.1-10.

Although the proposed project would not have a significant impact on fire protection services, the following mitigation measures are recommended to further reduce the proposed project's less-than-significant impact on fire protection services:

Mitigation Measures

- (M.1-1) During demolition, the Fire Department access shall remain clear and unobstructed.

- (M.1-2) Fire lane width shall not be less than 20 feet. When a fire lane must accommodate the operation of Fire Department aerial ladder apparatus or where fire hydrants are installed, those portions shall not be less than 28 feet in width.
- (M.1-3) The width of private roadways for general access use and fire lanes shall not be less than 20 feet clear to the sky.
- (M.1-4) Fire lanes, where required and dead ending streets shall terminate in a cul-de-sac or other approved turning area. No dead ending street or fire lane shall be greater than 700 feet in length or secondary access shall be required.
- (M.1-5) Where access for a given development requires accommodation of Fire Department apparatus, minimum outside radius of the paved surface shall be 35 feet. An additional six feet of clear space must be maintained beyond the outside radius to a vertical point 13 feet 6 inches above the paved surface of the roadway.
- (M.1-6) No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel, except for dwelling units, where the travel distance shall be computed to the front door of the unit.
- (M.1-7) No building or portion of a building shall be constructed more than 150 feet from the edge of a roadway of an improved street, access road, or designated fire lane.
- (M.1-8) Access for Fire Department apparatus and personnel to and into all structures shall be required.
- (M.1-9) At areas designated by the Fire Department, the structural system shall be demonstrated, by engineering calculations, as capable of sustaining Fire Department vehicle loads. The design methodology shall conform to the latest edition of the State of California Department of Transportation Bridge Design Specifications Manual.
- Basic design requirement (within the public right-of-way and for private roads, alleys, streets, etc.):

AASHTO HS20-44 with the Impact Increment = 30%
 - Special case for areas which are outside the public right-of-way, not a road and restricted to passenger vehicles only:

AASHTO HS15-44 with Impact Increment = 30%
- (M.1-10) The proposed project shall comply with all applicable State and local codes and ordinances, and guidelines found in the Fire Protection and Fire Prevention Plan, as well as

the Safety Plan, both of which are elements of the General Plan for the City of Los Angeles C.P.C. 19708.

Police Protection

Impacts

Developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious. Deployment of roving security guards is also an effective strategy in preventing problems from developing. In addition, construction of the proposed project is not expected to cause significant congestion at the local study intersections. Although minor traffic delays may occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times would be minimal and temporary. Therefore, the proposed project's construction-related impacts to police protection services would be less than significant.

Implementation of the proposed project would result in an increase in the number of resident on the project site, a net decrease in the number of employees and visitors on the project site. The building and layout design of the proposed project would include crime prevention features, such as nighttime security lighting, full-time onsite professional security, building security systems, and secure subterranean parking facilities. The LAPD has stated that the West Los Angeles Area Community Police Station is staffed and equipped to provide full service to the West Los Angeles area, which includes the project site, and that the proposed project would not result in the need for construction or expansion of police stations or other police protection facilities.

While the proposed project would not have a significant construction-related impact on police protection services or on police protection services following its buildout, the following mitigation measures are recommended to ensure that the LAPD's recommendations for the proposed project are addressed:

Mitigation Measures

- (M.2-1) During construction activities, the project developer shall ensure that all onsite areas of active development, material and equipment storage, and vehicle staging, that are adjacent to existing public roadways, be secured to prevent trespass.
- (M.2-2) The project developer shall submit a plot plan for the proposed development to the LAPD's Crime Prevention Section for review and comment. Security features subsequently recommended by the LAPD shall be implemented, to the extent feasible.
- (M.2-3) The project homeowners' association(s) shall retain a single alarm and security patrol company to patrol the site and correct false alarms expeditiously.

Schools

Impacts

Based on Los Angeles Unified School District student generation factors, a net increase of approximately three elementary students, two middle school students, and three high school students (approximately eight students total) would be generated by development of the proposed project (see Table IV.M-5 in Section IV.M.3, Schools). With the exception of Westwood Elementary, all of the public schools serving the project site would have adequate capacity to accommodate the students generated by the proposed project. While the proposed project would slightly increase the enrollment of Westwood Elementary, which is expected to already be operating over capacity by the 2009-2010 school year, the proposed project's three elementary students would not be expected to generate the specific need for a new or expanded school. However, implementation of the mitigation measure identified below, requiring the mandatory payment of school fees in conformance with SB 50, would address the proposed project's impact on schools. Furthermore, in accordance with SB 50, payment of school fees is deemed to provide full and complete mitigation to impacts on schools pursuant CEQA.

Mitigation Measures

- (M.3-1) The project applicant shall pay all applicable school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

Recreation and Parks

Impacts

The proposed project would generate a need for 1.57 (392 x 4/1,000) acres of public parkland in the project area. The proposed project would integrate approximately two acres of landscaped open space available to project residents, including an outdoor swimming pool, spa and deck, and a private garden with barbecues, sitting areas, and walking paths. Although the proposed landscaped open space would not be open to the public, it may offset some of the demand for parkland. Based on this estimate, the proposed project is providing approximately 0.43 (2.0 – 1.57) more acres than the desired acreage of parkland, as determined by the City's ratio.

The City requires developers of subdivisions to dedicate parkland or to pay fees in lieu of parkland dedication. The provision of the onsite recreational and outdoor facilities, together with the payment of the required in lieu fees (Quimby fees), would reduce the proposed project's impact upon parks and recreational facilities. Therefore, the proposed project would have a less-than-significant impact related to park and recreational facilities.

Libraries

Impacts

The proposed project would generate need for approximately 196 square feet (392 x 0.5) of library space and 784 (392 x 2) volumes of permanent collection. Both the Westwood Branch Library and the Palms-Rancho Park Branch Library currently meet the demands of the surrounding community. The library space in these two libraries would be able to accommodate the library space demands of the additional 392 project residents. Therefore, the proposed project would result in a less-than-significant library facilities impact.

Transportation and Traffic

Impacts

The grading and construction of the proposed project would take approximately 2.5 years to complete. It is likely that short-term traffic impacts would occur in the immediate area during the busiest construction phase (i.e., foundation, building shell and finish construction phases). Therefore, mitigation measures are recommended below, to address this potentially significant, albeit temporary impact.

With the current mix of residential and commercial uses, the proposed project would be expected to generate less traffic than the former St. Regis Hotel.

A Congestion Management Program (CMP) traffic impact analysis is required if a project will add 150 or more trips to the freeway, in either direction during either the AM or PM weekday peak hour. An analysis is also required at all CMP monitoring intersection where a project would add 50 or more peak hour trips. The two nearest CMP intersections are Wilshire Boulevard and Beverly Glen Boulevard, and Santa Monica Boulevard and Wilshire Boulevard. The proposed project is a trip neutral project and, therefore, the proposed project peak hour traffic volume would not exceed the CMP limits. Based on this information, no additional CMP intersections or freeway analysis is necessary.

Mitigation Measures

- (N-1) Prior to the issuance of construction permits the developer shall prepare Work Area Traffic Control Plans that at a minimum should include:
- Identification of a designated haul route to be used by construction trucks;
 - Provide an estimate of the number to trucks trips and anticipated trips;
 - Identification of traffic control procedures, emergency access provisions, and construction alternative crew parking locations;
 - Identification of the onsite location of vehicle and equipment staging;

- Provide a schedule of construction activities;
- Limitations on any potential lane closures to off-peak travel periods;
- Scheduling the delivery of construction materials during non-peak travel periods, to the extent possible;
- Coordinating deliveries to reduce the potential of trucks waiting to unload building materials; and
- Prohibiting parking by construction workers on neighborhood streets as determined in conjunction with city Staff.

(N-2) To ensure pedestrian safety, the developer shall ensure that there are appropriate access restrictions to the project site, covered sidewalks, and designating alternative pedestrian routes.

Utilities and Service Systems

Wastewater

Impacts

The proposed project is estimated to generate a total of 33,500 gpd of wastewater. However, considering the wastewater generation of the former hotel, the proposed project would –result in a net decrease of 6,390 gpd of wastewater.

The existing sewer lines under Constellation and Olympic Boulevards have the capacity to handle the sewage generation flow from the proposed project, based on the estimated flows in the area and because the proposed residences would generate less wastewater than the former hotel. Since there are existing sewer lines adjacent to and nearby the project site with sufficient capacity to handle the flows from the proposed project, no offsite sewer line improvements are anticipated, other than the proposed project's connection. Further, the Hyperion Treatment Plant (HTP) has approximately 100 mgd of remaining capacity, which would be increased by the net decreased flow of 5,630 gpd from the project site. The proposed project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. Thus, the proposed project would have no impact on sewer systems.

Water Supply

Impacts

The proposed project would result in the demand for approximately 38,664 gallons per day (gpd) of water. However, considering the water demand of the former hotel, the proposed project would result in a net decrease of 6,756 gpd of water.

The existing 12-inch water mains under both Avenue of the Stars and Olympic Boulevard would serve the project site with potable water. The proposed project would result in a net decrease in water consumption from the former hotel, and existing water infrastructure and treatment facilities that serve the project site are considered to be adequate. Therefore, no construction of or expansion of infrastructure or water treatment facilities would be needed to accommodate the proposed project. Thus, there would be no impact on water supply systems.

Furthermore, as determined by the Los Angeles Fire Department (LAFD), the overall fire flow requirement for the proposed project is 12,000 gallons per minute (gpm) from any block fire hydrants flowing simultaneously with a 20 PSI minimum residual pressure. Currently, water pressure and availability in the project area are sufficient to meet the LAFD's existing fire flow requirements as the proposed residential uses would actually call for similar fire flow requirements as are currently provided to the former hotel on the project site. Therefore, no impacts related to fire flow requirements would occur.

Although the proposed project would have a less-than-significant impact on water supply, the following mitigation measures are recommended to ensure compliance with Sections 121.00 through 122.00 of the LAMC:.

Mitigation Measures

- (O.2-1) The project developer shall ensure that the landscape irrigation system be designed, installed and tested to provide uniform irrigation coverage. Sprinkler head patterns shall be adjusted to minimize over spray onto walkways and streets.
- (O.2-2) The project developer shall install either a "smart sprinkler" system to provide irrigation for the landscaped areas or, at a minimum, set automatic irrigation timers to water landscaping during early morning or late evening hours to reduce water losses from evaporation. Irrigation run times for all zones shall be adjusted seasonally, reducing water times and frequency in the cooler months (fall, winter, spring). Sprinkler timer run times shall be adjusted to avoid water runoff, especially when irrigating sloped property.
- (O.2-3) The project developer shall select and use drought-tolerant, low-water-consuming plant varieties to reduce irrigation water consumption.

- (O.2-4) The project developer shall install low-flush water toilets and water-saving showerheads in new construction. Low-flow faucet aerators should be installed on all sink faucets.

Solid Waste

Impacts

Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. The construction of the proposed project is estimated to generate approximately 2,498,380 pounds (1,249 tons) of solid waste over the construction period. Recycling of construction-related waste materials in compliance with AB 939 would substantially reduce this waste stream that would otherwise go to a landfill. Therefore, approximately 1,249,190 pounds (625 tons) of construction waste⁴ would be disposed of in the landfills. The remaining combined daily intake of the Sunshine Canyon and Chiquita Canyon Landfill is 6,279 tons per day. As such, they would have adequate capacity to accommodate the average daily construction waste of 625 tons generated by the proposed project over its two-year construction period. Therefore, a less-than-significant impact associated with construction waste would occur.

Operation of the proposed project would result in ongoing generation of solid waste. Over the long-term, the proposed project would be expected to generate approximately 244 pounds or 0.122 tons of solid waste per day, or 44.53 tons per year. With compliance with AB 939, approximately 122 pounds (244/2) or 0.061 tons of the proposed project's total daily solid waste generation (or 22.27 tons per year) must be recycled rather than disposed of in a landfill. If the entire 122 pounds or 0.061 tons per day of solid waste generated by the proposed project was disposed of in the Sunshine Canyon Landfill, the Sunshine Canyon Landfill would have more than enough permitted capacity to accommodate this additional contribution of less than one tenth of one ton per day.

The proposed project's impacts on the City's solid waste disposal facilities would be less than significant and mitigation measures are, therefore, not required. Nonetheless, measures are recommended to reduce further the proposed project's already less-than-significant solid waste impacts.

Mitigation Measures

- (O.3-1) In compliance with AB 939, the construction contractor shall only contract for waste disposal services with a company that recycles construction-related wastes.
- (O.3-2) In compliance with AB 939, to facilitate the onsite separation and recycling of construction-related wastes, the construction contractor should provide temporary waste separation bins onsite during construction.

⁴ (2,498,380 pounds of solid waste generated by the proposed project)/2 per AB 939.