TAB 2

121 Spalding Project Staff Report

Part 1: Staff report and Attachments A-C

Part 2: Attachment D with Appendix A

Part 3: Attachment D Appendix B

ATTACHMENT D

CLASS 32 CATEGORICAL EXEMPTION REPORT

City of Beverly Hills

121 South Spalding Drive Parking Structure and Office Project

CEQA Class 32 Categorical Exemption Report

June 2012

Environmental Scientists Planners Engineers

121 South Spalding Drive Parking Structure and Office Project

CEQA Class 32
Categorical Exemption Report

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121 South Spalding Parking Structure and Office Project

CEQA Class 32 Categorical Exemption Report

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CATEGORICAL EXEMPTION REPORT

This report serves as the technical documentation of environmental analysis performed by Rincon Consultants, Inc., for the 121 South Spalding Drive Parking Structure and Office Project in the City of Beverly Hills. The intent of the analysis is to confirm that the project is eligible for a Class 32 Categorical Exemption (CE). The following report provides an introduction, project description, and evaluation of the project's consistency with the requirements for a Class 32 exemption. This includes an analysis of the project's potential impacts in the areas of traffic, air quality, noise, and water quality. The report concludes that the project is eligible for the Class 32 Categorical Exemption.

1. INTRODUCTION

The City of Beverly Hills proposes to adopt a Class 32 CE for a proposed project at 121 South Spalding Drive. The State CEQA Guidelines Section 15332 state that a CE is allowed when:

(a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.
(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.
(c) The project site has no value as habitat for endangered, rare or threatened species.
(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.
(e) The site can be adequately served by all required utilities and public services.

Rincon Consultants, Inc., evaluated the project's consistency with the above requirements, including its potential impacts in the areas of traffic, noise, air quality, and water quality to confirm the project's eligibility for the Class 32 exemption.

2. PROJECT DESCRIPTION

Project Overview. The project would involve demolition of an existing three-level (including rooftop) parking structure and construction of a new four-story structure including the following elements:

- Two underground parking levels;
- Three above-ground parking levels, with 2,412 square feet of office space on the ground floor fronting Spalding Drive;
- Approximately 8,779 square feet of office space on the fourth floor; and
- A slight adjustment of the right-of-way for the existing adjacent alley that outlets on South Lasky Drive and Charleville Boulevard.

Table 1 shows the levels within the proposed building and the square footage of each level.

Table 1
Proposed Floor Area Distribution

Level	**Proposed Floor Area (square feet)**
Basement Level B2	10,765
Basement Level B1	10,766
Ground Level	10,089
Parking Level P1	10,303
Parking Level P2	10,275
Office Level 3	8,793
Roof Deck	3,500
Total	**60,992 square feet**

The existing parking garage to be demolished is currently dedicated to parking demaond from the adjacent commercial building to the north. The adjacent building served by the existing structure is currently closed for renovations, and the proposed project would be completed prior to the completion of the adjacent renovations. Therefore, the temporary loss of parking spaces during demolition and construction would not affect parking demand. One loading space is proposed consistent with the City's code requirements (Municipal Code Table 10-3-2741.2).

3. EXISTING SITE CONDITIONS

The site is located on the west side of Spalding Drive just south of Wilshire Boulevard in the City of Beverly Hills. The project site's location is shown in Figure 1. The approximately 0.28-acre, generally rectangular and relatively flat project site is surrounded by office buildings to the north and west, the Mosaic Hotel to the south, and Spalding Drive to the east. The existing parking garage is three levels in height and is dedicated to parking uses serving the adjacent commercial building to the north. The building is entirely surrounded by urban uses. The structure is a light colored concrete structure with horizontal openings and panels on each of the levels and an open rooftop for parking. Metal stair cases are present on the northeast and northwest portions of the structure. The structure is connected to the Mosaic Hotel on the southern portion and is adjacent to an alley on the northern and western portion of the building.

4. CONSISTENCY ANALYSIS

Criterion (a) *The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*

The project site is designated for commercial uses in the City of Beverly Hills General Plan and is zoned C-3 Commercial. Pursuant to Section 10-3-1601 of the Beverly Hills Municipal Code, office uses (excluding medical uses) and parking garages are permitted uses in the C-3 District. The proposed office and parking structure project is thus consistent with the commercial zoning and land use designations of the project site. The C-3 Zone District requires that buildings have a maximum Floor-to-Area Ratio (FAR) of 2.0 and a maximum height of 45 feet.

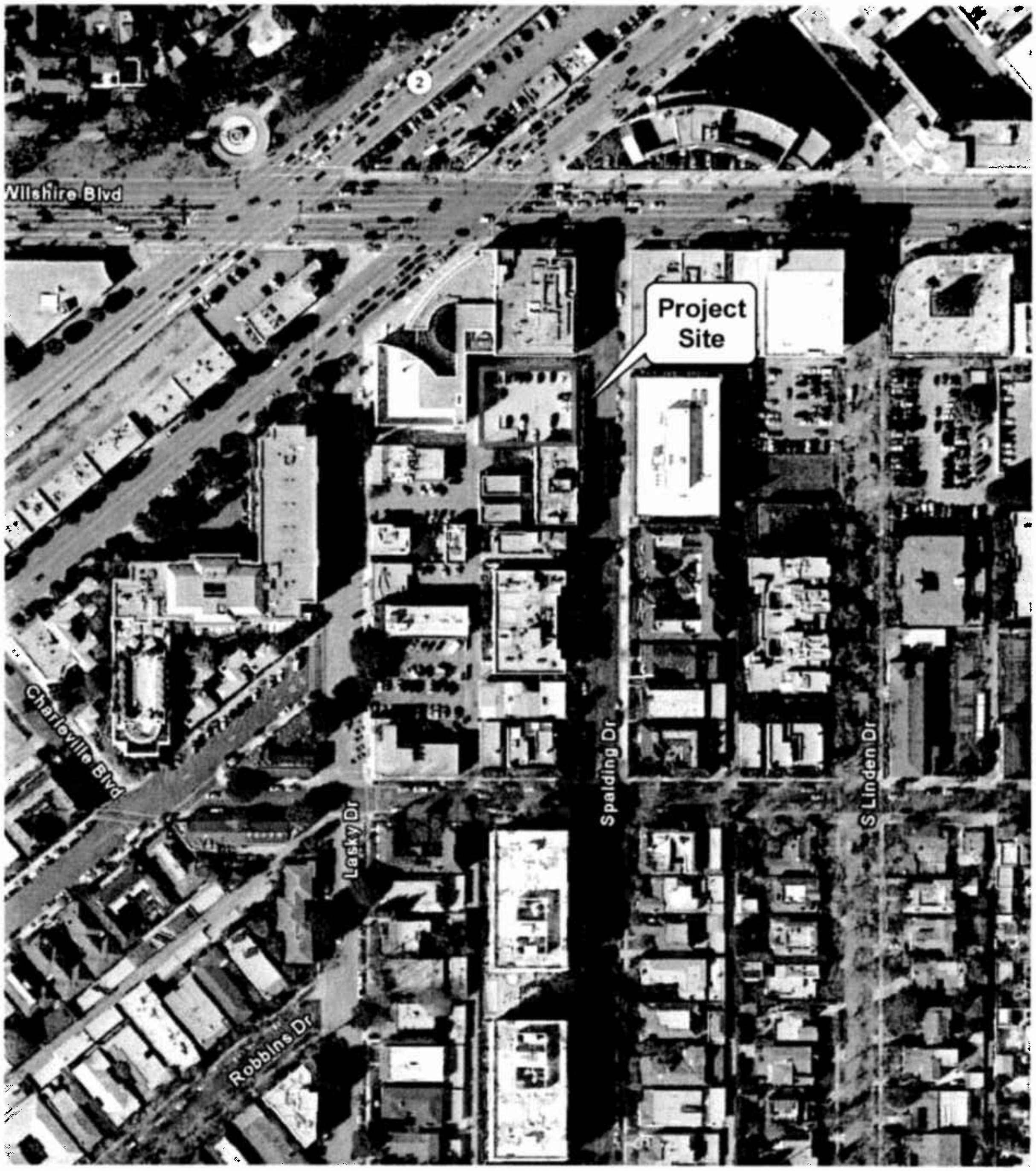

Image: Google Earth 2010 SketchUp-Pro.

N

0 100 200

Scale in Feet

Project Location

Figure 1

The site would have allowable FAR of 2.0 (24,480 square feet) since it is in the C-3 zone. The proposed structure would have an overall gross floor area of 60,992 square feet and a maximum height of 45 feet at the roof deck. The FAR of the proposed building, excluding the basement levels, parking levels, and roof deck, would be well within the allowed 2.0. Therefore, the project would be consistent with the site's land use and zoning designations and applicable zoning regulations.

Criterion (b) *The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

The project site is located on an approximately 0.28-acre parcel within a developed urban neighborhood. It is immediately surrounded by urban uses on all sides.

Criterion (c) *The project site has no value as habitat for endangered, rare, or threatened species.*

The project site is located within a highly developed urban area generally lacking in habitat that would be suitable for sensitive animal and plant species. In addition, the project site itself is currently developed with asphalt and structures and does not contain any vegetation or other features that could function as habitat for sensitive species.

Criterion (d) *Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

The following discussion provides an analysis of the project's potential effects with respect to traffic, noise, air quality, and water quality.

A. TRAFFIC

This discussion summarizes selected information from and key conclusions of a Transportation Assessment memorandum prepared for the project by Fehr and Peers, dated June 6, 2012. This memorandum is included in its entirety as Appendix A to this report.

Trip Generation. The proposed project consists of five levels of parking and 11,191 square feet of office space. Since the parking component of the project is intended to solely serve the existing user base at 9800 Wilshire and the 11,191 square feet of new office space, it would not be classified as a trip generator. Thus, trip generation estimates were solely developed for the office land use component of the project. Trip rates were based on estimates from Trip Generation, 8th Edition (Institute of Transportation Engineers [ITE], 2008), which are based on a compilation of empirical trip generation surveys at locations throughout the country to forecasts the number of trips that would be generated by the project. As shown in Table 2, the project is expected to generate 124 daily trips, including 18 during the AM peak hour, and 17 during the PM peak hour.

Table 2
Trip Generation

Land Use	ksf	Daily Trip Rate	Daily Trips	AM Trip Rate	AM Peak Hour Trips	PM Trip Rate	PM Peak Hour Trips
Office							
Floor 1	2.412	11.01	27	1.55	4	1.49	4
Floor 2	8.779	11.01	97	1.55	14	1.49	13
Total Trips			124		18		17

ksf = thousand square feet *Source: Fehr and Peers, 2012 Table 1.*

Traffic Impact Assessment. Although the City of Beverly Hills does not identify a trip generation threshold that requires a traffic study, the number of peak hour trips that the proposed project would generate is substantially below thresholds identified by the City of Los Angeles (43) and the Los Angeles Congestion Management Plan (50). For a project with as few project trips as the proposed project, it is highly unlikely that a significant traffic effect could occur.

To further confirm that traffic from the project would not result in significant impacts at nearby intersections, Fehr and Peers conducted a high-level impact assessment (Fehr and Peer's memorandum is included in its entirety as Appendix A to this report) at the two closest signalized intersections – South Santa Monica Boulevard & Wilshire Boulevard and North Santa Monica Boulevard & Wilshire Boulevard. Fehr and Peers applied project trips using a similar trip distribution pattern to other recent traffic studies in the vicinity of the proposed project with approximately 30% of project trips originating west of the site, 35% east of the site, and 35% south of the site. With this distribution pattern, there are no more than 5 project trips traveling through the nearby signalized intersections of South Santa Monica Boulevard & Wilshire Boulevard and North Santa Monica Boulevard & Wilshire Boulevard during either the AM or PM peak hours. At the intersection of Spalding Drive & Wilshire Boulevard, there would be fewer than 15 trips at the intersection during either peak hour, as shown in Table 2 below.

Table 3
Spalding Drive and Wilshire Boulevard
Trip Assignment

Scenario	Northbound Right Turn	Westbound Left Turn	Eastbound Right Turn
AM Peak Hour	1	6	4
PM Peak Hour	5	1	1

Source: Fehr and Peers, 2012 Table 2.

The project is not anticipated to result in a significant impact at any of the nearby intersections, as the project does not generate enough traffic at any intersection to trigger an impact.

The City of Beverly Hills also has impact criteria for residential streets. The maximum allowable increase for residential streets ranges from 6.25% for streets with daily vehicular volumes (ADT) exceeding 6,750 to 16% for vehicles with ADT below 2,000. For a roadway segment with an ADT of 2,000, the roadway could have an increase of 320 trips without triggering an impact. The project would generate approximately 124 daily trips; based on the application of the aforementioned trip distribution, it would be anticipated that no more than 64 trips would be added to a given roadway segment. Thus, project impacts at residential streets are not anticipated.

Parking Supply and Demand. The existing project site has 108 marked parking stalls located in a three-level structure. The parking supply in the proposed building would accommodate both users of the proposed project's office land use and the 9800 Wilshire Boulevard office building. This office building is 35,558 square feet. The peak parking demand generated by an office, according to Parking Generation, 4th Edition (Institute of Transportation Engineers [ITE], 2010), ranges from 1.46 to 3.43 vehicles per 1,000 square feet of space. By applying this range of rates to the proposed office space, the parking demand generated by the project would range from 16-38 spaces during the peak period, with 33 parking spaces representing the 85th percentile of parking generation. When added to the 108 existing spaces, the parking demand for the project would range from 124-146 spaces.

The City of Beverly Hills requires one parking space for every 350 square feet of commercial land use (Municipal Code §10-3-2730). Thus, the existing 35,558 square foot office building at 9800 Wilshire Boulevard requires 102 parking spaces. Based on the proposed 11,191 square feet of proposed office space, the project would require 32 parking spaces for that land use to be parked to code. The existing office building at 9800 Wilshire Boulevard has 35,558 square feet of office space. To conform to the City's parking code, it would require 102 parking spaces. Since the office space in the proposed project requires 32 parking spaces, the complete project would require 134 parking spaces. The proposed parking supply would be 134 spaces. The Municipal Code also requires one truck loading space for between 7,500 and 15,000 square feet of office space. The applicant has proposed two potential locations for the loading space, and City staff has indicated that the space can be accommodated within one of the proposed locations (Ryan Gohlich, pers. comm. 5/30/12). Therefore, the parking supply would be sufficient and appropriate to accommodate the existing users and the proposed office space.

The adjacent building served by the existing structure is currently closed for renovations, and the proposed project would be completed prior to the completion of the adjacent renovations. Therefore, the temporary loss of parking spaces during demolition and construction would not affect parking demand.

Site Access. The existing parking structure has three access points. Parking on the ground level is used for single-day visitors and is available to the public. Ground level access is primarily provided on Spalding Drive, but drivers can also enter and exit this level from an alley that runs along the west side of the existing parking structure. This alley provides access to Charleville Boulevard to the south, Lasky Drive to the west, and Spalding Drive to the east. The second and third levels of the existing structure are used for monthly parking users, with sole access to/from Spalding Drive, just south of the ground floor parking entrance. There would be one ingress point and one egress point for the proposed structure as follows:

- Ingress: Users would enter the parking structure on the north side of the garage using the existing east-west alley. Spalding Drive provides the most direct access to this alley and the structure's entrance, and would likely be the primary roadway for users parking at this location. Additional ingress is provided along the west side of the garage via the existing north-south alley, although it is anticipated that this driveway would serve as a secondary access point.

- Egress: The egress point is located on the west side of the parking structure and exits to the existing north-south alley. This access point is at the same location as the existing western ground floor access driveway. This access point is most proximate to Spalding Drive, but drivers could also utilize the alley to exit onto Charleville Boulevard or Lasky Drive (similar to current conditions).

Although the existing 15-foot-wide alley is wide enough to support two-way traffic, the project would reduce the footprint of the structure to provide a right-of-way dedication to the city for the purpose of widening the alley and increasing the total alley right-of-way. Ultimately, most users would likely utilize the east-west portion of the alley that directly connects the driveway access points to and from Spalding Drive, similar to how the existing parking structure operates. Furthermore, the widening of this alley would not disrupt other users of the alley as no other access points would be removed or relocated due to the project. Therefore, new issues with regard to site access are not anticipated.

Construction Traffic. Construction traffic impacts are identified as significant on roadway facilities if the construction of a project creates a prolonged impact due to lane closure, emergency vehicle access, traffic hazards to bicycles and/or pedestrians, damage to the roadbed, truck traffic on roadways not assigned as truck routes, and other similar impediments to circulation.

Based on standard estimates for construction workers and equipment, construction traffic and activity is anticipated to include a maximum of approximately:

- 21 workers/day
- 9 vendor trips/day
- 5 pieces of equipment/day (maximum of 100 daily hauling trips)

Based on the following assumptions, it is not anticipated that project construction would cause significant traffic impacts:

- It is anticipated that the construction vehicles and construction workers would be accessing the site from Wilshire Boulevard. This roadway is a major thoroughfare in the area and is a designated truck route within the City limits. It is unlikely that the influx of construction vehicles at the levels that would be generated by the project would significantly disrupt traffic along this roadway.
- The project's construction traffic is not anticipated to affect emergency vehicle access or create hazards to bicycles and pedestrians, as the project would have relatively few construction trips, which will be distributed over the course of the day.
- The total number of construction trips would be staggered throughout the day, with most trips occurring during off-peak hours. Worker trips would generally occur during the peak hours and truck trips would generally occur during off-peak hours.

To reduce temporary disruptions on the adjacent roadway network due to construction activities, the project would be expected to comply with the standard City of Beverly Hills condition of approval requiring preparation and approval of a Construction Management Plan prior to the initiation of construction activities. The plan would address the following items:

- Maintain existing access for land uses in proximity of the project site during project construction.
- Identify locations for construction worker parking.
- Schedule deliveries and hauling of construction materials to non-peak travel periods, to the maximum extent feasible.
- Coordinate deliveries and hauling to reduce the potential of trucks waiting to load or unload for extended periods of time.
- Minimize obstruction of through traffic lanes on Spalding Drive.
- Control construction equipment traffic with flagmen and traffic control devices.
- Identify designated transport routes for heavy trucks to be used over the duration of the construction activities.
- Establish requirements for loading/unloading and storage on the project site, where parking spaces would be encumbered, length of time traffic lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure safety and access to local businesses.
- Coordinate with adjacent businesses and emergency service providers to ensure adequate access exists to the project site and neighboring businesses.

Finally, it should be noted that construction traffic impacts are temporary by their nature, and would have no effect on traffic and circulation beyond the construction period.

Conclusion. The assessment of traffic impacts, parking supply and demand, and site access determined that there would be no significant impacts.

B. NOISE

Noise Characteristics and Measurement. Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

One of the most frequently used noise metrics that considers duration as well as sound power level is the equivalent noise level (L_{eq}). The L_{eq} is defined as the steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual time-varying levels over a period of time (essentially, L_{eq} is the average sound level).

Noise Standards. The City of Beverly Hills' General Plan incorporates comprehensive goals, policies, and implementing actions related to noise and acceptable noise levels. These policies address unnecessary, excessive, and annoying noise levels and sources, such as vehicles, construction, special sources (e.g., radios, musical instrument, animals, etc.) and stationary sources (e.g., heating and cooling systems, mechanical rooms, etc.). For traffic-related noise, impacts would be significant if project-generated traffic results in exposure of sensitive receptors to unacceptable noise levels. The May 2006 Transit Noise and Vibration Impact Assessment created by the Federal Transit Administration (FTA) recommendations were used to determine whether or not increases in roadway noise would be considered significant. The allowable noise exposure increase changes with increasing noise exposure, such that lower ambient noise levels have a higher allowable noise exposure increase.

Table 3 shows the significance thresholds for increases in traffic related noise levels caused by the project.

Table 3
Significance of Changes in Operational Roadway Noise Exposure

Ldn or Leq in dBA	
Existing Noise Exposure	**Allowable Noise Exposure Increase**
45-50	7
50-55	5
55-60	3
60-65	2
65-70	1
75+	0

Source: Federal Transit Administration (FTA), May 2006

If residential development or other sensitive receptors would be exposed to traffic noise increases exceeding the above criteria, impacts would be significant. Impacts relating to onsite activities would be significant when project-related activities create noise exceeding the standards as identified by the applicable noise zone for the project site. The project is located in an area zoned for commercial use (C-3). The nearest sensitive receptors to the project site are hotel patrons immediately south of the site.

Construction Noise. The grading phase of project construction tends to create the highest construction noise levels because of the operation of heavy equipment. The project would result in temporary noise level increases during site preparation, demolition, paving, and building. As shown in Table 4, noise levels associated with heavy equipment typically range from about 76 to 89 dBA at 50 feet from the source.

Table 4
Typical Noise Levels at Construction Sites

Equipment Onsite	Average Noise Level at 50 Feet
Air Compressor	81 dBA
Concrete Mixer	85 dBA
Saw	76 dBA
Scraper	89 dBA

Source: Transit Noise and Vibration Impact Assessment, Harris Miller Miller & Hanson Inc., May 2006.
Note: Pile drivers are not permitted onsite pursuant to the City of Beverly Hills Building and Safety Department (Ryan Gohlich, personal communication, April 2012).

Pursuant to the City's noise ordinance (Municipal Code Section 5-1-202), a significant impact would occur if construction activities occurring on the project site would result in an increase of 5 dB(A) above the ambient level outside the hours permitted by the City's noise ordinance (i.e., between the hours of 6:00 PM and 8:00 AM on weekdays, or at any time on Saturday, Sunday or a public holiday). Ambient noise levels onsite were measured on April 20, 2012, at 12:50 PM, during the weekday mid-day peak traffic hour. Noise levels were measured to be 63.8 dBA and 62.2 dBA. Therefore, based on the noise levels shown in Table 4 above, noise levels would be anticipated to exceed ambient noise levels by more than 5 dBA during construction. However, these noise levels would occur during the daytime in accordance with the permitted hours stipulated in the Municipal Code, and would be temporary, occuring only during certain construction phases. As noted above, the nearest sensitive receptors to the project site are hotel patrons immediately south of the site. Hotel uses are less noise-sensitive during the daytime, particularly weekdays, than certain other sensitive uses such as hospitals and residences. Construction noise would occur only during the daytime, and only on weekdays. Therefore, construction of the project would not result in any significant noise impacts to area sensitive receptors.

Construction Vibration. Vibration is a unique form of noise. It is unique because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise; e.g., the rattling of windows from truck pass-bys. This phenomenon is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, groundborne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases and vibration rapidly diminishes in amplitude with distance from the source. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB) in the U.S.

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel wheeled trains, and traffic on rough roads. If a roadway is smooth, the groundborne vibration from traffic is barely perceptible. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings.

Significant impacts occur when vibration or groundborne noise levels exceed the Federal Railroad Administration (FRA) maximum acceptable level threshold of 65 VdB for buildings where low ambient vibration is essential for interior operations (such as hospitals and recording studios), 72 VdB for residences and buildings where people normally sleep, including hotels, and 75 VdB for institutional land uses with primary daytime use (such as churches and schools).

Construction activities that would occur on the project site have the potential to generate groundborne vibration. Table 5 identifies various vibration velocity levels for the types of construction equipment that are likely to operate at the project site during construction.

Based on the information presented in Table 5, vibration levels could be approximately 87 VdB at the existing hotel located immediately south of the project site. As noted above, impacts would be significant if vibration levels exceeded 72 VdB during recognized sleep hours (as established by the Federal Railway Administration for places where people normally sleep). Therefore, although the project would exceed the groundborne velocity threshold level of 72 VdB, construction would not occur during hours of recognized sleep in accordance with requirements of the City's Municipal Code. In addition, the project would not exceed vibration levels that could potentially damage nearby buildings.

Table 5
Vibration Source Levels for Construction Equipment

	Approximate VdB				
Equipment	**25 Feet**	**50 Feet**	**60 Feet**	**75 Feet**	**100 Feet**
Large Bulldozer	87	81	79	77	75
Loaded Trucks	86	80	78	76	74
Jackhammer	79	73	71	69	67
Small Bulldozer	58	52	50	48	46

Source: Federal Railroad Administration, 1998

Construction activity would be temporary, and the use of heavy equipment would be primarily limited to the demolition, excavation, site preparation and exterior construction phases. As construction of the outer shell of the building progresses, the building itself would contain much of the construction activity, and the likelihood of utilizing bulldozers and jackhammers decreases. Trucks would still be anticipated to bring construction materials to the site, which may periodically generate vibrations that would be felt by nearby receptors; however, the vibrations would not be likely to persist for long periods.

Construction activities and associated vibration levels would be limited to daytime hours between 8:00 AM to 6:00 PM Monday through Friday per Section 5-1-206 of Article 2 of the Municipal Code. Therefore, vibration levels would be unlikely to affect sensitive receptors at the hotel and residential uses south of the hotel that are usually sensitive to vibration levels when sleep is disturbed. As noted above, hotel uses are less noise-sensitive during the daytime, particularly weekdays, than certain other sensitive uses such as hospitals and residences. Construction noise would occur only during the daytime, and only on weekdays. Because vibration would be a temporary impact during construction, impacts would be less than significant. Although impacts would be less than significant, measures to reduce vibration to the hotel patrons are suggested as part of the conditions of approval. Examples of such measures are as follows:

- *The applicant shall develop a vibration-reducing construction schedule and techniques that shall be submitted to the Building and Safety Division for review and approval. It shall include:*
    - *Two signs, legible at a distance of 50 feet, shall be posted in a prominent and visible location at the construction site, and shall be maintained throughout the construction process. All notices and the signs shall indicate the dates and duration of construction activities, as well as provide a telephone number where residents can inquire about the construction process and register complaints.*
- *Demolition, earth-moving and ground-impacting operations shall be phased so as not to occur in the same time period to the extent feasible.*
- *Heavy equipment over 40 tons (such as large bulldozers or loaded trucks) shall not operate adjacent to nearby sensitive receptor locations to the extent feasible.*
- *Vibration dampening devices shall be used to the extent feasible.*
- *Construction equipment with rubber tires shall be used to the extent feasible.*
- *Speed limits for construction equipment shall be minimized to the extent feasible.*

Operational Noise. The most common sources of noise in the project vicinity are transportation-related, such as automobiles, trucks, and motorcycles. Motor vehicle noise is of concern because it is characterized by a high number of individual events, which often create a sustained noise level, and because of its proximity to areas sensitive to noise exposure. The primary sources of roadway noise near the project site are Wilshire Boulevard, Spalding Drive, and Santa Monica Boulevard. Noise levels associated with future traffic along area roadways would not be substantially increased compared to existing conditions since the project would add incremental trips to area intersections and roadways (124 average daily trips, 18 AM peak hour trips, and 17 PM peak hour trips). As discussed in the Traffic section above, under a maximum impact scenario, the increase in V/C would be less than 0.010. Therefore, noise levels would not substantially increase compared to existing conditions.

Conclusion. The proposed project is not expected to result in a significant long-term increase in traffic noise levels, and temporary construction noise would be less than significant. The project does not propose any operational changes that would be expected to have an effect on daily onsite operational noise generated by the existing building. Therefore, noise-related impacts resulting from implementation of the proposed project would be less than significant.

C. AIR QUALITY

A significant adverse air quality impact may occur when a project individually or cumulatively interferes with progress toward the attainment of the ozone standard by releasing emissions that equal or exceed the established long term quantitative thresholds for pollutants, or causes an exceedance of a state or federal ambient air quality standard for any criteria pollutant. The project site is located within the South Coast Air Basin and falls under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). This air quality analysis conforms to the methodologies recommended in the South Coast Air Quality Management District CEQA Air Quality Handbook (1993). The following significance thresholds have been recommended by the SCAQMD for project operations within the South Coast Air Basin:

- *55 pounds per day of ROG*
- *55 pounds per day of NO_X*
- *550 pounds per day of CO*
- *150 pounds per day of PM_{10}*

Construction-related air quality impacts are considered significant if emissions associated with construction activity would exceed adopted SCAQMD thresholds. Temporary construction emission thresholds have been recommended by the SCAQMD on a daily basis as follows:

- *75 pounds per day of ROG*
- *100 pounds per day of NO_X*
- *550 pounds per day of CO*
- *150 pounds per day of PM_{10}*

In addition to the regional air quality thresholds shown above, SCAQMD has also developed Localized Significance Thresholds (LSTs) in response to the Governing Board's Environmental Justice Enhancement Initiative (1-4), which was prepared to update the SCAQMD's CEQA Air Quality Handbook. LSTs were devised in response to concern regarding exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size, distance to the sensitive receptor, etc. However, LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction and operation. LSTs have been developed for NO_X, CO, PM_{10} and $PM_{2.5}$. LSTs are not applicable to mobile sources such as cars on a roadway (Final Localized Significance Threshold Methodology, SCAQMD, June 2003). As such, LSTs for operational emissions would not apply to the proposed project as the majority of emissions would be generated by cars on the roadways.

<u>Operational Emissions.</u> Long-term operational emissions associated with the proposed project are those associated with vehicle trips (mobile emission) and the use of natural gas and landscaping maintenance equipment (area source emissions) upon buildout of the project. Pollutant emissions associated with the proposed project were quantified using the CalEEMod air quality model based on the proposed use and the number of associated vehicle trips generated by the project as discussed above. The estimate of operational emissions includes

both emissions from vehicle trips and from electricity and natural gas consumption. The vehicle trip assumptions are based on traffic data from the traffic study (see Appendix A).

Table 6 provides the estimated net increase in operational emissions that would result from implementation of the proposed project. Please refer to Appendix B for complete modeling results. Emissions from existing operations that would be replaced were quantified, and then subtracted from the estimated emissions that would result from the proposed new development.

Table 6
Unmitigated Operational Emissions

	Emissions (lbs/day)			
	ROG	**NO_X**	**CO**	**PM_{10}**
Emissions	**2.13**	**1.86**	**7.52**	**1.35**
SCAQMD Thresholds	*55*	*55*	*550*	*150*
Exceed Thresholds?	*No*	*No*	*No*	*No*

Source: CalEEMod 2012.

Note: Please see Appendix B for complete modeling results. Summer construction and operational emissions were modeled and reported for a conservative estimate of project emissions, since emission estimates are typically higher in the summer months compared to the winter months. Summer emission estimates report the most conservative pounds-per-day of emissions associated with the project, which are then compared to the SCAQMD thresholds measured in pounds-per-day. The CalEEMod emissions model shows the maximum day in the summer months, which results in a conservative estimate of project emissions. The annual emissions listed in the tables in Appendix B show the average annual emissions over the year. These estimates are used for analysis of greenhouse gas emissions impacts, since the greenhouse gas emission thresholds are based on metric tons per year.

As shown, the emissions generated by the proposed project would not exceed the SCAQMD's daily operational thresholds for any pollutant and would not significantly affect regional air quality. Therefore, the impact is less than significant for the proposed project.

Construction Emissions. Development of the proposed project would involve demolition, site grading, excavation, new building construction, and other construction-related activities that have the potential to generate substantial air pollutant emissions. Temporary construction emissions from these activities were estimated using the CalEEMod air quality model. Table 7 shows the maximum daily construction emissions.

As indicated in Table 7, emissions from construction activities would not exceed SCAQMD daily significance thresholds. Therefore, construction activities would not result in any significant construction-related air quality impacts.

Table 7
Estimated Maximum Daily Emissions
During Construction (pounds per day)

	ROG	NO_X	CO	PM_{10}
Emissions	56.35	73.02	45.53	13.12
Threshold (peak day)	*75*	*100*	*550*	*150*
Exceed Thresholds?	*No*	*No*	*No*	*No*

Source: CalEEMod 2012.
Note: Please see Appendix B for complete modeling results. Summer construction and operational emissions were modeled and reported for a conservative estimate of project emissions, since emission estimates are typically higher in the summer months compared to the winter months. Summer emission estimates report the most conservative pounds-per-day of emissions associated with the project, which are then compared to the SCAQMD thresholds measured in pounds-per-day. The CalEEMod emissions calculator model shows the maximum day in the summer months, which results in a conservative estimate of project emissions. The annual emissions listed in the tables in Appendix B show the average annual emissions over the year. These estimates are used for analysis of greenhouse gas emissions impacts, since the greenhouse gas emission thresholds are based on metric tons per year.

Conclusion. The proposed project would not generate significant air quality impacts. Additionally, as discussed in the Traffic section, this project would not result in significant traffic impacts at signalized intersections, causing the level of service (LOS) to change to E or F. Thus, the project would not require analysis for CO hotspots, based on the recommendations contained in Caltrans' Transportation Project CO Protocol Manual.

D. GREENHOUSE GAS EMISSIONS

Climate Change and Greenhouse Gases. Climate change is the observed increase in the average temperature of the Earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period of time. The term "climate change" is often used interchangeably with the term "global warming," but "climate change" is preferred to "global warming" because it helps convey that there are other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. Per the United Nations Intergovernmental Panel on Climate Change (IPCC, 2007), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (90% or greater chance) that the global average net effect of human activities since 1750 has been one of warming. The prevailing scientific opinion on climate change is that most of the observed increase in global average temperatures, since the mid-20th century, is likely due to the observed increase in anthropogenic GHG concentrations (IPCC, 2007).

Gases that absorb and re-emit infrared radiation in the atmosphere are called greenhouse gases (GHGs). GHGs are present in the atmosphere naturally, are released by natural sources, or are formed from secondary reactions taking place in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and sulfur hexafluoride (SF_6) (California Environmental Protection Agency [CalEPA], 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2E), and is the amount of a GHG emitted multiplied by its GWP. Carbon dioxide has a GWP of one. By contrast, methane (CH_4) has a GWP of 21, meaning its global warming effect is 21 times greater than carbon dioxide on a molecule per molecule basis (IPCC, 1997).

The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHG, Earth's surface would be about 34° C cooler (CalEPA, 2006). However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Based upon the California Air Resources Board (ARB) *California Greenhouse Gas Inventory for 2000-2008* (http://www.arb.ca.gov/cc/inventory/data/data.htm), California produced 478 MMT CO_2E in 2008. The major source of GHG in California is transportation, contributing 36% of the state's total GHG emissions. Electricity generation is the second largest source, contributing 24% of the state's GHG emissions (ARB, June 2010). California emissions are due in part to its large size and large population compared to other states. Another factor that reduces California's per capita fuel use and GHG emissions, as compared to other states, is its relatively mild climate. ARB has projected statewide unregulated GHG emissions for the year 2020, which represent the emissions that would be expected to occur in the absence of any GHG reduction actions, will be 596 MMT CO_2E (ARB, 2007).

Regulatory Setting. Assembly Bill (AB) 1493 (2002), referred to as "Pavley," requires ARB to develop and adopt regulations to achieve "the maximum feasible and cost-effective reduction of GHG emissions from motor vehicles." On June 30, 2009, EPA granted the waiver of Clean Air Act preemption to California for its greenhouse gas emission standards for motor vehicles beginning with the 2009 model year. Pavley I took effect for model years starting in 2009 to 2016 and Pavley II, which is now referred to as "LEV (Low Emission Vehicle) III GHG" will cover 2017 to 2025. Fleet average emission standards would reach 22 per cent reduction by 2012 and 30 per cent by 2016.

In 2005, Governor Schwarzenegger issued Executive Order S-3-05, establishing statewide GHG emissions reduction targets. Executive Order (EO) S-3-05 provides that by 2010, emissions shall be reduced to 2000 levels; by 2020, emissions shall be reduced to 1990 levels; and by 2050, emissions shall be reduced to 80% of 1990 levels (CalEPA, 2006). In response to EO S-3-05, CalEPA created the Climate Action Team (CAT), which in March 2006 published the Climate Action Team Report (the "2006 CAT Report") (CalEPA, 2006). The 2006 CAT Report identified a recommended list of strategies that the state could pursue to reduce GHG emissions. These are strategies that could be implemented by various state agencies to ensure that the emission reduction targets in EO S-3-05 are met and can be met with existing authority of the state agencies. The strategies include the reduction of passenger and light duty truck emissions, the reduction of idling times for diesel trucks, an overhaul of shipping technology/infrastructure, increased use of alternative fuels, increased recycling, and landfill methane capture, etc.

California Regulations. California's major initiative for reducing GHG emissions is outlined in Assembly Bill 32 (AB 32), the "California Global Warming Solutions Act of 2006," signed into law in 2006. AB 32 codifies the Statewide goal of reducing GHG emissions to 1990 levels by 2020 (essentially a 15% reduction below 2005 emission levels; the same requirement as under S-3-05), and requires ARB to prepare a Scoping Plan that outlines the main State strategies for reducing GHGs to meet the 2020 deadline. In addition, AB 32 requires ARB to adopt regulations to require reporting and verification of statewide GHG emissions.

After completing a comprehensive review and update process, the ARB approved a 1990 statewide GHG level and 2020 limit of 427 MMT CO_2E. The Scoping Plan was approved by ARB on December 11, 2008, and includes measures to address GHG emission reduction strategies related to energy efficiency, water use, and recycling and solid waste, among other measures. The Scoping Plan includes a range of GHG reduction actions that may include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms.

Executive Order S-01-07 was enacted on January 18, 2007. The order mandates that a Low Carbon Fuel Standard ("LCFS") for transportation fuels be established for California to reduce the carbon intensity of California's transportation fuels by at least 10% by 2020.

Senate Bill (SB) 97, signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in California Environmental Quality Act (CEQA) documents. In March 2010, the California Resources Agency (Resources Agency) adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted guidelines give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Senate Bill (SB) 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing ARB to develop regional greenhouse gas emission reduction targets to be achieved from vehicles for 2020 and 2035. SB 375 directs each of the state's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). On September 23, 2010 ARB adopted final regional targets for reducing greenhouse gas emissions from 2005 levels by 2020 and 2035.

ARB Resolution 07-54 establishes 25,000 metric tons of GHG emissions as the threshold for identifying the largest stationary emission sources in California for purposes of requiring the annual reporting of emissions. This threshold is just over 0.005% of California's total inventory of GHG emissions for 2004.

In April 2011, Governor Brown signed SB 2X requiring California to generate 33% of its electricity from renewable energy by 2020.

<u>CEQA Requirements</u>. Pursuant to the requirements of SB 97, the Resources Agency has adopted amendments to the State CEQA Guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions. The adopted CEQA Guidelines provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, but contain no suggested thresholds of significance for GHG emissions. Instead, they give lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The general approach to developing a Threshold of Significance for GHG emissions is to identify the emissions level for which a project would not be expected to substantially conflict with existing California legislation adopted to reduce statewide GHG emissions needed to move the state towards climate stabilization. If a project would generate GHG emissions above the threshold level, its contribution to cumulative impacts would be considered significant. To date, the Bay Area Air Quality Management District (BAAQMD), the South Coast Air Quality Management District (SCAQMD), and the San Joaquin Air Pollution Control District (SJVAPCD) have adopted quantitative significance thresholds for GHGs. The SCAQMD threshold, which was adopted in December 2008, considers emissions of over 10,000 metric tons CO_2E /year to be significant. However, the SCAQMD's threshold applies only to stationary sources and is expressly intended to apply only when the SCAQMD is the CEQA lead agency. Note that no air district has the power to establish definitive thresholds that will completely relieve a lead agency of the obligation to determine significance on a case-by-case basis for a specific project. Currently, the recommended thresholds that would be appropriate for the proposed project include a 4.6 metric tons CO2e per service population (defined to include both residents and employees) per year (SCAQMD, "Proposed Tier 4 Performance Thresholds," September 2010), a 1,400 metric tons CO2e per year threshold recommended by SCAQMD for commercial projects, or a 3,000 metric tons CO2e per year threshold recommended by SCAQMD for all land use types. For this project, it is appropriate to use the 1,400 metric tons CO2e per year threshold or the 3,000 metric tons CO2e per year threshold recommended by SCAQMD for commercial projects because this project is an office project that includes a substantial amount of parking space. Because the square footage of the parking structure portion of the project would serve a population much greater than the office square footage within the building would generate, a threshold using service populations would be unrealistic for this project.

In an effort to guide professional planners, land use officials, and CEQA practitioners, OPR prepared *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA).* This document offers informal guidance regarding the steps lead agencies should take to address climate change in CEQA documents. This guidance was developed in cooperation with the Resources Agency, Cal EPA, and the ARB.

Construction Emissions. Based on the CalEEMod model results, construction activity for the project would generate an estimated 289.6 metric tons CO_2E (as shown in Table 8) during construction. Amortized over a 30-year period (the assumed life of the project), construction of the proposed project would generate an estimated 9.7 metric tons CO_2E per year.

Table 8
Estimated Construction Emissions of Greenhouse Gases

	Construction Emissions (CO_2E)
Total Emissions	289.6 metric tons
Amortized over 30 years	9.7 metric tons per year

Source: CalEEMod, 2012. See Appendix B for GHG emission worksheets and assumptions.

Operational Indirect, Stationary Direct, and Mobile Emissions.

Energy Use and Area Sources. Operation of the proposed project would consume both electricity and natural gas (see Appendix B for calculations). Project operation would consume an estimated 170,945 kilowatt-hours [kWh] of electricity per year (refer to Appendix B). The generation of electricity used by the project would occur at offsite power plants, much of which would be generated by the combustion of fossil fuels that yields CO_2, and to a smaller extent N_2O and CH_4. As discussed above, annual electricity and natural gas emissions was calculated using the CalEEMod computer program, which has developed emission factors, based on the mix of fossil-fueled generation plants, hydroelectric power generation, nuclear power generation, and alternative energy sources associated with the regional grid. Other stationary direct sources include hearths, consumer products, area architectural coatings, and landscaping equipment.

Solid Waste. For the business-as-usual scenario, it is anticipated that the project would generate approximately 4.63 tons CO_2e due to generation of solid waste per year according to the CalEEMod output, which uses current waste disposal rates provided by CalRecycle.

Water Use. Based on the CalEEMod model estimate, on site development under business-as-usual conditions would generate approximately 13.01 tons CO_2e due to water use each year.

Transportation. Mobile source GHG emissions were estimated using the traffic study prepared by Fehr and Peers in 2012. Using this estimate, the CalEEMod model estimates that the proposed project would generate approximately 148.58 metric tons CO_2e emissions.

Combined Construction, Stationary and Mobile Source Emissions. Table 9 combines the construction, operational (energy use, solid waste, and water use emissions), and mobile GHG emissions associated with the proposed project, which would total approximately 231.59 metric tons CO_2E per year. This total represents approximately 0.0000005% of California's 2006 emissions of 480 MMT. These emission projections indicate that the majority of the project GHG emissions are associated with vehicle trips. It should be noted that mobile emissions are in part a redirection of existing travel to other locations, and so may already be a part of the total California GHG emissions.

Table 9
Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions (CO_2E)
Construction	9.7 metric tons (amortized, as shown in Table 8 above)
Operational	
Energy Use and Area Sources	55.67 metric tons
Solid Waste	4.63 metric tons
Water	13.01 metric tons
Mobile	
Transportation	148.58 metric tons
Total	**231.59 metric tons**

Source: CalEEMod, 2011. See Appendix B for GHG emission worksheets and assumptions.

As shown in Table 9, combined annual emissions would be 231.59 metric tons CO_2e per year. As discussed above, the recommended thresholds that would be appropriate for the proposed project include the 1,400 metric tons CO_2e per year threshold for commercial projects and the 3,000 metric tons CO_2e per year threshold for all land use types recommended by SCAQMD. As emissions would not exceed either of these thresholds, GHG impacts would be less than significant.

Conclusion. The proposed project is not expected to generate greenhouse gas emissions that would result in a significant impact.

E. WATER QUALITY

Urban runoff can have a variety of deleterious effects. Oil and grease contain a number of hydrocarbon compounds, some of which are toxic to aquatic organisms at low concentrations. Heavy metals such as lead, cadmium, and copper are the most common metals found in urban stormwater runoff. These metals can be toxic to aquatic organisms, and have the potential to contaminate drinking water supplies. Nutrients from fertilizers, including nitrogen and phosphorous, can result in excessive or accelerated growth of vegetation or algae, resulting in oxygen depletion and additional impaired uses of water.

The project site is entirely paved and developed, with virtually no infiltration potential. Stormwater runoff currently drains to existing City drainage facilities. The proposed building would include a 435 square foot courtyard, which would slightly increase the amount of pervious material onsite. However, water would not infiltrate into a groundwater basin, since the subterranean parking component of the project would be immediately below the courtyard.

Neither the permeability nor the hydrology of the site would change with project implementation, as the project would replace a building that is almost entirely impervious with another building that is almost entirely impervious.

The applicant would be required to submit a Standard Urban Storm Water Mitigation Plan (SUSMP) to the City of Beverly Hills Utilities Division for review and approval. The proposed project would be required to comply with the current National Pollutant Discharge Elimination System (NPDES) MS4 Permit during construction and operation of the project. The applicant would be required to control pollutant discharge by utilizing Best Management Practices (BMPs) such as the Best Available Technology Economically Achievable (BAT) and the Best Conventional Pollutant Control Technology (BCT) in order to avoid discharging pollutants into waterways. BMPs would be required during general operation of the project to ensure that storm water runoff meets the established water quality standards and waste discharge requirements. Required compliance with SUSMP and NPDES requirements would reduce the potential for adverse water quality and hydrology effects. Development of the proposed project would not result in a reduction in groundwater recharge or otherwise affect the underlying groundwater basin; would not result in additional stormwater runoff; and would not degrade the quality of stormwater runoff from the site.

Conclusion. The proposed project would not adversely affect underground aquifers, drainage patterns, or surface water quality. All impacts related to water quality would be less than significant.

Criterion (e) *The site can be adequately served by all required utilities and public services.*

The project would be located in an existing highly urban area served by existing public utilities and services. A substantial increase in demand for services or utilities would not be anticipated with implementation of the proposed project. The City of Beverly Hills provides water, sewer, and solid waste collection services to the existing building and would continue to provide these services to the proposed project. Other services, including gas and electricity, would also continue to be provided to the proposed project by existing service providers. Thus, the project meets this criterion for exemption.

5. SUMMARY

Based on this analysis, the proposed 121 South Spalding Drive Parking Structure and Office Project meets all five criteria for a Class 32 Categorical Exemption pursuant to Section 15332 of the *State CEQA Guidelines.*

6. REFERENCES

Beverly Hills, City of, General Plan, updated January 2010.

Beverly Hills, City of, Municipal Code. Available online at http://www.sterlingcodifiers.com/codebook/index.php?book_id=466

California Air Pollution Control Officers Association. *CEQA and Climate Change: Addressing Climate Change through California Environmental Quality Act (CEQA).* January 2008.

California Climate Action Registry. *California Climate Action Registry General Reporting Protocol: Reporting Entity-Wide Greenhouse Gas Emissions.* Version 2.2. Accessed online at http://www.climateregistry.org/, 2009.

California Energy Commission. *Inventory of California Greenhouse Gas Emissions and Sinks: 2000-2004.* December, 2006.

California Environmental Protection Agency, March 2006. *Climate Action Team Report to Governor Schwarzenegger and the Legislature.* http://www.climatechange.ca.gov/climate_action_team/reports/2006-04-03_FINAL_CAT_REPORT_EXECSUMMARY.PDF

Caltrans, Transportation Project CO Protocol Manual, revised 1997.

Gohlich, Ryan. Associate Planner, City of Beverly Hills. Personal Communications, April 2012.

Intergovernmental Panel on Climate Change [IPCC], 2007: Summary for Policymakers. In: *Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change* [Solomon, S., D. Qin, M. Manning, Z. Chen, M. Marquis, K.B. Averyt, M.Tignor and H.L. Miller (eds.)]. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA.

South Coast Air Quality Management District, *2007 Air Quality Management Plan,* adopted by the SCAQMD on June 1, 2007 and is available to download at http://www.aqmd.gov/aqmp/07aqmp/index.html.

South Coast Air Quality Management District, California Emissions Estimator Model (CalEEMod), 2012.

South Coast Air Quality Management District, *CEQA Air Quality Handbook*, 1993.

U.S. Environmental Protection Agency (USEPA). *Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2006.* April 15, 2008 Final.

Appendix A

Transportation Assessment Memorandum

FEHR & PEERS

MEMORANDUM

Date: June 4, 2012

To: Abe Leider, Rincon Consultants

From: Tamar Fuhrer, AICP & Sarah Brandenberg, PE

Subject: ***Transportation Assessment of 121 Spalding Drive Project***

SM12-2525.00

This memorandum documents a high-level transportation assessment for the proposed parking structure and office building at 121 Spalding Drive in Beverly Hills. The proposed project's trip generation, on-site parking supply and demand, site access, and construction traffic plans are reviewed to assess potential impacts.

PROJECT DESCRIPTION

The proposed project is located at 121 Spalding Drive in Beverly Hills. The project will replace an existing three-level, 108-space parking structure that is currently utilized for users of the 9800 Wilshire Boulevard office building. The new project would be a combination of parking and office space as follows:

- Two levels of subterranean parking
- Three levels of above-ground parking
- 2,412 square feet of office space on the ground floor fronting Spalding Drive
- 8,779 square feet of office space on the fourth floor

The parking proposed for this project will be developed for users of the 9800 Wilshire Boulevard office building and the office space on the project site. The project will also change the building footprint to widen the alley that provides access to South Lasky Drive and Charleville Boulevard.

TRAFFIC ASSESSMENT

Trip Generation

The proposed project consists of five levels of parking and 11,191 square feet of office space. Since the parking component of the project is intended to solely serve the existing user base at 9800 Wilshire and the 11,191 square feet of office space, it would not be classified as a trip generator. Thus, trip generation estimates were solely developed for the office land use component of the project. We used rates from Trip Generation, 8th Edition (Institute of Transportation Engineers [ITE], 2008), which are based on a compilation of empirical trip generation surveys at locations throughout the country to forecasts the number of trips that

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would be generated by the project. As shown in Table 1, the project is expected to generate 124 daily trips, including 18 during the AM peak hour, and 17 during the PM peak hour.

TABLE 1
121 SPALDING DRIVE TRIP GENERATION

Land Use	ksf	Daily Trip Rate	Daily Trips	AM Trip Rate	AM Peak Hour Trips	PM Trip Rate	PM Peak Hour Trips
Office							
Floor 1	2.412	11.01	27	1.55	4	1.49	4
Floor 2	8.779	11.01	97	1.55	14	1.49	13
Total Trips			**124**		**18**		**17**

Source: *Trip Generation (8^{th} Ed.)*, Institute of Transportation Engineers (ITE), 2008.

Traffic Impact Assessment

As previously noted, the proposed project will generate 18 AM peak hour trips and 17 PM peak hour trips. Although the City of Beverly Hills does not identify a trip generation threshold for requiring a traffic study, the number of peak hour trips that the project would generate is substantially below thresholds identified by the City of Los Angeles (43) and the Los Angeles Congestion Management Plan (50). The thresholds identified by these two agencies were developed to limit traffic studies to locations where there is a true potential for traffic impacts. For a project with as few project trips as 121 Spalding, it is highly unlikely that a significant traffic impact could occur.

To further confirm that traffic from the project will not result in significant impacts at nearby intersections, we conducted a high-level impact assessment at the two closest signalized intersections – South Santa Monica Boulevard & Wilshire Boulevard and North Santa Monica Boulevard & Wilshire Boulevard. We applied project trips using a similar trip distribution pattern to other recent traffic studies in the vicinity of the proposed project, with approximately 30% of project trips originating west of the site, 35% east of the site, and 35% south of the site. With this distribution pattern, there are no more than 5 project trips traveling through the nearby signalized intersections of South Santa Monica Boulevard & Wilshire Boulevard and North Santa Monica Boulevard & Wilshire Boulevard during either the AM or PM peak hours. At the intersection of Spalding Drive & Wilshire Boulevard, there would be fewer than 15 trips at the intersection during either peak hour, as shown in Table 2, below.

TABLE 2 SPALDING DRIVE & WILSHIRE BOULEVARD PROJECT TRIP ASSIGNMENT			
Scenario	**Northbound Right-Turn**	**Westbound Left-Turn**	**Eastbound Right-Turn**
AM Peak Hour	1	6	4
PM Peak Hour	5	1	1

Source: *Fehr & Peers, 2012.*

The project is not anticipated to trigger a significant impact at any of the nearby intersections, as the project does not generate enough traffic at any intersection to trigger an impact.

The City of Beverly Hills also has impact criteria for residential streets. The maximum allowable increase for residential streets ranges from 6.25% for streets with daily vehicular volumes (ADT) exceeding 6,750 to 16% for vehicles with ADT below 2,000. For a roadway segment with an ADT of 2,000, the roadway could have an increase of 320 trips without triggering an impact. The project generates 124 daily trips, and based on the application of the aforementioned trip distribution, it would be anticipated that no more than 64 trips would be added to a given roadway segment. Thus, we do not anticipate any project impacts at residential streets.

PARKING SUPPLY & DEMAND

The existing project site has 108 marked parking stalls located in a three-level structure. This parking supply is used by the 9800 Wilshire Boulevard office building, which is adjacent to the project site. This office building is 35,558 square feet. The parking supply in the proposed project will accommodate both users of the proposed project's office land use and the 9800 Wilshire Boulevard office building. Thus, it is important to identify parking demand for the proposed office land uses to ensure adequate parking supply for both sets of users.

The peak parking demand generated by an office, according to Parking Generation, 4th Edition (Institute of Transportation Engineers [ITE], 2010), ranges from 1.46 to 3.43 vehicles per 1,000 square feet of space. This is based on a compilation of empirical trip generation studies throughout the country. By applying this range of rates to the proposed office space, the parking demand generated by the project can range from 16-38 spaces during the peak period, with 33 parking spaces representing the 85th percentile of parking generation. When added to the 108 existing spaces, the parking demand for the project would range from 124-146 spaces.

The City of Beverly Hills requires one parking space for every 350 square feet of commercial land use (Municipal Code §10-3-2730). Thus, the existing 35,558 square foot office building at 9800 Wilshire Boulevard requires 102 parking spaces. Based on the proposed 11,205 square feet of proposed office space, the project would require 32 parking spaces for that land use to be parked to code. Coupled with the existing requirement for 102 parking spaces, the complete project would require 134 parking spaces, similar to the parking demand identified in Parking Generation.

It is our understanding that the proposed parking supply will be 134 spaces. Therefore, the parking supply would be sufficient and appropriate to accommodate the existing users and the proposed office space.

SITE ACCESS

The existing parking structure has three access points. Parking on the ground level is used for single-day visitors and is available to the public. Ground level access is primarily provided on Spalding Drive, but drivers can also enter and exit this level from an alley that runs parallel to Spalding Drive (between Spalding Drive and Lasky Drive) and intersects with Spalding Drive and Lasky Drive just north of the existing parking structure. This alley provides access to Charleville Boulevard to the south, Lasky Drive to the west, and Spalding Drive to the east. The second and third levels of the existing structure are used for monthly parking users, with sole access to/from Spalding Drive, just south of the ground floor parking entrance.

Based on the architect's plans for the proposed parking structure, there will be one ingress point and one egress point for the proposed structure as follows:

- **Ingress:** Users will enter the parking structure on the north side of the garage using the existing alley. Spalding Drive provides the most direct access to this alley and the structure's entrance and would likely be the primary roadway for users parking at this location.

- **Egress:** The egress point is located on the west side of the parking structure and exits to the alley. This access point is at the same location as the existing western ground floor access driveway. This access point is most proximate to Spalding Drive, but drivers could also utilize the alley to exit onto Charleville Boulevard or Lasky Drive (similar to current conditions).

Although the existing alley is wide enough to support two-way traffic, the project plans to further reduce the footprint of the structure to widen the alley within its property, thus increasing the total alley right-of-way. Ultimately, most users will likely utilize the northern portion of the alley that directly connects the driveway access points to- and from- Spalding Drive, similar to how the existing parking structure operates. Furthermore, the widening of this alley would not disrupt other users of the alley as no other access points are removed or relocated due to the project. Therefore, we do not anticipate any new issues with regard to site access.

CONSTRUCTION TRAFFIC

Construction traffic impacts are identified as significant on roadway facilities if the construction of a project creates a temporary, but prolonged impact due to lane closure, emergency vehicle access, traffic hazards to bicycles and/or pedestrians, damage to the roadbed, truck traffic on roadways not assigned as truck routes, and other similar impediments to circulation.

During construction, the project intends to have the following activity at its maximum:

- 21 workers/day
- 9 vendor trips/day
- 5 pieces of equipment/day (maximum of 100 daily hauling trips)

The maximum number of daily trips generated by project construction is fairly minimal. We do not anticipate that project construction would cause significant traffic impacts, due to the following:

- We anticipate that the construction vehicles and construction workers would be accessing the site from Wilshire Boulevard. This roadway is a major thoroughfare in the area and is a designated truck route within the City limits. It is unlikely that the influx of construction vehicles would significantly disrupt traffic along this roadway.
- The project has planned for on-site parking for construction workers. As such, worker parking would not create an impact on nearby streets.
- The project's construction traffic is not anticipated to affect emergency vehicle access or create hazards to bicycles and pedestrians.
- The total number of construction trips would be staggered throughout the day, with most trips occurring during off-peak hours.

To reduce temporary disruptions on the adjacent roadway network due to construction activities, the project will develop a Construction Management Plan for approval by the City of Beverly Hills prior to the initiation of construction activities. The plan will address the following items:

- Maintain existing access for land uses in proximity of the project site during project construction.
- Schedule deliveries and hauling of construction materials to non-peak travel periods, to the maximum extent feasible.
- Coordinate deliveries and hauling to reduce the potential of trucks waiting to load or unload for extended periods of time.
- Minimize obstruction of through traffic lanes on Spalding Drive.
- Control construction equipment traffic with flagmen and traffic control devices.
- Identify designated transport routes for heavy trucks to be used over the duration of the construction activities.
- Establish requirements for loading/unloading and storage on the project site, where parking spaces would be encumbered, length of time traffic lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure safety and access to local businesses.
- Coordinate with adjacent businesses and emergency service providers to ensure adequate access exists to the project site and neighboring businesses.

For workers traveling to the site, it is our understanding that there is sufficient on-site parking for all workers. Therefore, no additional management plans for construction workers are necessary.

SUMMARY

The proposed project at 121 Spalding Drive is a combination of a parking structure and general office space. The parking structure will be constructed to serve its existing users from the office building at 9800 Wilshire Boulevard and the users of the proposed office uses at 121 Spalding Drive. The proposed project would provide 134 parking spaces, which would be sufficient and appropriate to accommodate the existing users and the proposed office space. We conducted a general assessment of traffic impacts, parking supply & demand, site access and construction impacts and found there to be no potential impacts with regard to this project.

We hope that you find this information helpful. If you have any questions, please contact Tamar Fuhrer or Sarah Brandenberg at (310) 458-9916.