

ATTACHMENT 2

ENVIRONMENTAL ASSESSMENT ANALYSIS REPORT

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Prepared by
Ramboll Environ US Corporation
Irvine, California

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ENVIRONMENTAL ASSESSMENT OF THE BEVERLY HILLS GARDEN AND OPEN SPACE INITIATIVE BEVERLY HILLS, CALIFORNIA

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ACRONYMS AND ABBREVIATIONS

AB 32	Assembly Bill 32
CARB	California Air Resources Board
CO	Carbon monoxide
dba	A-weighted decibels
EIR	Environmental Impact Report
GHG	Greenhouse gas
L_{eq}	Equivalent continuous sound level
L₂₅	Sound level exceeded 25 percent of the time
LST	Localized significance level
NO_x	Oxides of nitrogen
PM	Particulate matter
PM₁₀	Particulate matter, 10 micrometers or smaller
PM_{2.5}	Particulate matter, 2.5 micrometers or smaller
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
SO_x	Sulfur oxide
VOC	Volatile organic compound

1. INTRODUCTION

1.1 Background and Purpose

In 2007 and 2008, the City of Beverly Hills (City) prepared an Environmental Impact Report (EIR) for the Beverly Hilton Revitalization Plan for the redevelopment of the approximately 8.97 acre property (Property) containing the Beverly Hilton Hotel (Project). The Project analyzed in the Draft EIR would have resulted in a total of 522 hotel guestrooms (a net reduction of 47 hotel guestrooms), 120 condominium units distributed across the site, and 20,523 square feet of restaurant, among other site-wide improvements.

During the Planning Commission's and City Council's consideration of the Project various modifications were made, including increasing building setbacks and reducing building height and massing and reducing the number of condominiums. At the conclusion of the public hearing process, the City Council approved a project that consists of, among other items, a maximum of 522 guestrooms in two hotels, 110 condominium units in two residential buildings, and a maximum of 20,253 square feet of restaurants (Approved Project).

On November 4, 2008, the City's voters approved Measure H adopting Resolution No. 08-R-1260 entitled "Resolution of the Council of the City of Beverly Hills amending the General Plan to enable the revitalization of the Beverly Hilton Hotel site with a new Luxury Hotel, Condominiums, and Open Space" thereby granting final approval of the Project including the Beverly Hilton Specific Plan (Specific Plan).

The proposed "Beverly Hills Garden and Open Space Initiative" would amend the Specific Plan to allow the development of a single residential building in the southwestern portion of the Property near the intersection of Santa Monica Boulevard and Merv Griffin Way instead of two separate residential buildings (Modified Project). The other development limitations in the Specific Plan would be preserved. Gardens and open space would take the place of the removed residential tower.

This Environmental Assessment (Assessment) has been prepared to analyze the potential environmental impacts due to the proposed changes.

1.2 Project Location

The project site is located at the western edge of the City of Beverly Hills. The project site is bounded on the north by Wilshire Boulevard, on the south by Santa Monica Boulevard, on the east by the intersection of Wilshire and Santa Monica Boulevards, and on the west by Merv Griffin Way (see Figures 1 and 2).

1.3 Project Description

The approved Project would have reconfigured and redeveloped the Property as follows (see Figure 3):

- Demolition of the Palm/Oasis Court containing 181 guestrooms; 36 Cabana/Lanai guestrooms; Pool Terrace and Pool; hotel entry drive, valet/lobby entrance and parking garage ramps; one-story Wilshire Boulevard "plinth" containing the hotel conference center, hotel support space, hotel and professional offices, retail, and a portion of the lobby bar and lobby; parking structure; and the former Trader Vic's restaurant;

- A new 12-story five-star luxury hotel approximately 150 feet in height above adjacent grade on the east end of the Property with a restaurant, a maximum of 170 guestrooms and meeting room space (East Luxury Hotel)¹;
- A new 8-story 36-unit condominium building a maximum of 101 feet in height above adjacent grade located in the northwestern portion of the Property near the intersection of Wilshire Boulevard and Merv Griffin Way (Residences A Building)²;
- A new 18-story 74-unit condominium building a maximum of 218 feet in height above adjacent grade located in the southwestern portion of the Property near the intersection of Santa Monica Boulevard and Merv Griffin Way (Residences B Building)³;
- Retention and renovation of the original Beverly Hilton Wilshire Tower containing 352 guestrooms⁴;
- A new 22,000 square-foot Beverly Hilton conference center building a maximum of 2 stories and 43 feet in height⁵;
- Development of a maximum of 20,253 square feet of restaurants⁶;
- Reconstruction of the Beverly Hilton pool, pool deck, and pool cabanas (for day use only);
- A new subterranean parking structure containing a total of 1,572 marked parking spaces, 331 valet spaces and capacity for 280 additional spaces to accommodate not less than 2,183 vehicles⁷; and
- Construction of approximately 142,800 square feet of new landscaped gardens and pedestrian amenities.

The Project consisted of a maximum of 110 residential units in two towers (one 8-story tower and one 18-story tower)⁸, a maximum of 522 hotel rooms in two buildings, a two-story conference center (maximum of 22,000 square feet), pool complex, restaurant(s) (maximum of 20,523 square feet), and subterranean parking structures (capacity for 2,183 vehicles).

Construction of the Approved Project was expected to be completed in five project phases over a period of 50 months. Construction activities included demolition, grading, building construction, architectural coatings, and paving.

¹ The EIR analyzed a 15-story five-star luxury hotel approximately 150 feet in height on the east end of the Property with a restaurant, 120 guestrooms on eight floors, and 30 condominiums on the top seven stories.

² The EIR analyzed a 10- to 13-story 42-unit condominium building approximately 150 feet in height.

³ The EIR analyzed a 13-story 48-unit condominium building approximately 150 feet in height.

⁴ The EIR analyzed the addition of a new 3-story Beverly Hilton wing 45 feet in height containing 50 guestrooms in addition to the 352 guestrooms in the Beverly Hilton Wilshire Tower.

⁵ The EIR analyzed a new 21,000 square-foot Beverly Hilton conference center resulting in no net increase in floor area compared to the demolished conference center.

⁶ The EIR analyzed the replacement of retail and hotel office space with no net increase in floor area.

⁷ The EIR analyzed two new subterranean parking structures containing a total of 1,422 parking spaces (a net increase of 604 parking spaces).

⁸ The EIR analyzed the development of 120 condominium units (30 units in the new East Luxury Hotel, 42 units in the Residences A Building, and 48 units in the Residences B Building).

1.4 Modified Project Description

The Modified Project consolidates the residential towers into one 26-story building, changes the configuration of the pool, open space, and restaurant(s), and modifies the distribution of conference center space. The number of residential units, the number, and capacity of parking structures, and the number of trips and expected flow of traffic will remain the same. The Modified Project consists of the following specific changes. All other development on the Property will remain consistent with the Specific Plan as approved by the City and the voters. (see Figure 4):

- Construction of a single 26-story residential building a maximum of 328 feet in height as measured from the site's datum with a maximum of 110 condominium units and 10 accessory staff rooms in the southwestern portion of the Property near the intersection of Santa Monica Boulevard and Merv Griffin Way instead of the two separate residential buildings. The combined residential building would contain the same amount of square footage as the previously approved Residence A and B buildings. Each of the 10 accessory staff rooms would be ancillary to a residential unit, would be no more than 500 square feet, and would contain only sleeping quarters with a bathroom and closet. No additional parking spaces would be required for the 10 accessory staff rooms;
- Development of publically accessible open space, including no less than a contiguous 1.7 acre garden in the northwestern portion of the Property, instead of the 8-story Residences A Building;
- Construction of a new one-story Conference/Hotel Facilities Addition to the Beverly Hilton a maximum 17 feet in height, as measured from the Project's datum, and may contain meeting rooms, restaurant and bar space, and other permitted hotel uses. The Beverly Hilton Wilshire Tower and associated buildings would continue to contain a maximum of 33,492 square feet of meeting rooms, exclusive of ballrooms;
- A revised location for the replacement Beverly Hilton pool, pool deck, and poolside cabanas;
- Allow accessory structures and features on the Conference/Hotel Facilities Addition, including but not limited to, changing rooms, pool deck bar, pool cabanas, elevator overruns, enclosed emergency egress stairways, and glass sound barriers;
- Allow accessory structures and features on the Residences Building, including but not limited to, changing rooms, pool cabanas, elevator overruns, and enclosed emergency egress stairways up to 30 feet above the finished roof, and glass sound barriers up to eight feet above the finished roof; and
- Construction of a total of approximately 169,400 square feet of new landscaped gardens and pedestrian amenities.

Construction activities to implement the Modified Project are expected to be completed in four project phases over a period of 50 months. Construction activities include demolition, grading, building construction, architectural coatings, and paving. Several specific construction activities expected for the Project (e.g., construction of additional temporary driveways, construction of two residence buildings) are no longer anticipated to occur for the Modified Project. In addition, some of the anticipated construction activities expected for the Project (i.e., demolition of some of the existing structures and surface parking) have already been completed or are well underway. The anticipated phasing represents the new

construction phasing plan, which reduces the number of construction activities and reduces the amount of overlapping construction activities while retaining the overall duration of construction to 50 months.

2. ENVIRONMENTAL ASSESSMENT

The EIR concluded that the analyzed Project would have significant impacts during operation in only three impact areas. The EIR found that there would be a significant and unmitigated impact on aesthetics due to increased development and heights, on cultural resources due to alteration of the existing architecture, and on land use and planning due to the introduction of residential land uses where none previously existed. The EIR also concluded that the analyzed Project would have temporary significant impacts during construction in only two areas. The EIR found that there would be a significant and unmitigated impact on noise due to noise at off-site receptors and vibration at on-site receptors and on air quality due to NO_x emissions during construction and PM₁₀ and PM_{2.5} concentrations at sensitive receptors.

The EIR also concluded the analyzed Project would not have any significant impacts in the following impact areas: agricultural and forestry resources, biological resources, geology and soils, hazards and hazardous, hydrology and water quality, mineral resources, transportation and traffic, population and housing, public services, and utilities and service systems.

As discussed below, the Modified Project would not result in any new significant impacts as compared to the City's EIR's conclusions and does not increase the severity of the three operational and two temporary construction significant impacts previously identified in the Project's EIR.

2.1 Assessment of Potential Environmental Impacts From the Modified Project

This section discusses the environmental areas that the City found the Project could have a potentially significant impact in the Project's EIR and where the proposed changes to the Project could potentially result in a change in the City's EIR's conclusions.

2.1.1 Aesthetics

The EIR analyzed the Project's impacts on aesthetics under the following significance criteria. The EIR asked whether the Project would:

- Have a substantial adverse effect on a scenic vista?
- Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Substantially degrade the existing visual character or quality of the site and its surroundings?
- Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impacts from Project

The EIR analyzed potential impacts to aesthetics and concluded that there were less than significant impacts to light and glare. The EIR also concluded that there were significant and unavoidable impacts to visual character/quality and views after mitigation (see Table 1). Specifically, the EIR concluded that the Project would impact views due to increased density,

create new residential uses where none currently exist, and result in building heights that were not consistent with then adopted Beverly Hills General Plan.

Impacts from Modified Project

The Modified Project will not result in any increase in aesthetics impacts compared to the Project. The key parameters of the Modified Project compared to the Project are described above in Section 1.3. The key areas that could impact aesthetics include the following.

1. There will be a new garden of no less than 1.7 acres and a single 26-story building in lieu of two previously approved towers (one 8-story and one 18-story).

Temporary Construction Impacts on Aesthetics Are Unchanged

The Modified Project will not substantially change the construction aesthetics impacts identified for the Project. The EIR concluded that the visual character of the site would be degraded during construction but that the impacts were considered less than significant due to the short-term nature of the activities. The types of construction activities and duration are not expected to increase or change under the Modified Project. Therefore, the construction aesthetics impacts would be the same as between the Project and the Modified Project. In fact, the time needed for construction may be decreased under the Modified Project. Reducing the duration of construction would reduce the duration of any short-term aesthetic impacts caused by such construction.

Operation

The Modified Project will not result in a change of the aesthetic impacts identified for the Project. The EIR concluded there were significant and unavoidable impacts on visual character due to the introduction of taller buildings on the Project Site and because of the change in views of the Beverly Hilton from the intersection of Wilshire and Santa Monica Boulevards (Viewshed Four) and west-facing panoramic views from the hotel's Wilshire Tower guestrooms (Viewshed Ten).

These aesthetic impacts will remain under the Modified Project, though such impacts may be reduced. The Modified Project will remove the 8-story tower proposed for Wilshire Boulevard and Merv Griffin Way. The elimination of the already approved 8-story tower and replacement of it with gardens and open space will eliminate any conflict with the existing visual character along Wilshire Boulevard and single-family homes to the north of the Project Site. While impacts to Viewshed Four are unchanged, the elimination of the already approved 8-story tower will also substantially improve views from and reduce impacts from Viewsheds Two, Eight, Nine and Ten. Under the Modified Project, the Wilshire Tower of the Beverly Hilton will now be visible from the intersection of Wilshire Boulevard and Merv Griffin Way when it almost fully obstructed under the Project.

The creation of a no less than 1.7-acre garden at the corner of Wilshire Boulevard and Merv Griffin Way will also enhance the visual character of this portion of the Project Site, which is a major gateway point to the City. The impacts of the already approved 18-story residential tower along Santa Monica Boulevard and Merv Griffin Way are unchanged as compared to the Modified Project's 26-story building. Thus, overall the aesthetic impacts will be reduced as compared to the Project and the Modified Project will not result in any substantial change to aesthetics impacts.

The EIR concluded that the Project would potentially result in cumulatively considerable impacts when considered with the adjacent 9900 Wilshire Project. No feasible mitigation measures were identified to reduce this impact.

All mitigation measures from the EIR intended to reduce aesthetic impacts (LG-1) will remain in effect.

2.1.1.1 Shade/Shadow

Shade and shadow impacts pertain to the blockage of direct sunlight on shade sensitive adjacent properties. Shade sensitive properties include private residences, recreational facilities, commercial properties such as outdoor restaurants, institutions (schools, nursing homes, etc.), or other land uses where the occupants expect or require direct sunlight for warmth or enjoyment of the property. The land uses of these properties are considered "shadow sensitive" because sunlight is important for function, warmth, or commerce.

The Modified Project's potential for shade impacts on adjacent properties is dependent on the height, bulk, and position of buildings. The range of shadow extent is dependent on season, latitude, and time of day, which determine the angle of the sun relative to the project site.

The potential for shade impacts on adjacent shade-sensitive land uses is determined by diagramming the footprint of the project building shadows at different times of the year. Shadows are the longest in the early morning when the sun is on the horizon. Total daily shading potential is typically greatest on the Winter Solstice (Dec. 21), when the sun is at its lowest maximum (noon-time) point in the sky.

Due to the increase in height of the tower associated with the Modified Project, shade and shadow impacts were assessed in more detail separately from the other aesthetics impacts. This detailed analysis confirms that the Modified Project shading does not differ substantially from the Project and would not result in a significant shade/shadow impact.

The shade/shadow impacts were evaluated in the EIR based on the following significance criteria. Would the project:

- Create a new source of shade or shadow which would adversely affect existing shade/shadow-sensitive structures or uses?

Impacts from Project Would Be Less Than Significant

The EIR analyzed potential impacts to shade and shadow impacts and concluded that there were less than significant impacts to shade and shadow (see Table 1) from both the project analyzed in the Draft EIR and the project that was ultimately approved.

Impacts from Modified Project Would Be Less Than Significant

The Modified Project would not result in a significant shade/shadow impact because no significant portion of a sensitive land use would be shaded for three or more hours during the day. As relevant for this analysis, the following conditions were evaluated.

1. The elimination of the already approved 8-story tower along Wilshire Boulevard and consolidation of remaining residential units in the already approved 18-story tower along Santa Monica Boulevard to increase it to 26-stories.
2. The 12-story luxury hotel located at the eastern corner of the property and at the intersection of Santa Monica and Wilshire Boulevards.

Existing Conditions and Shade-Sensitive Land Uses

The site is currently developed with an existing hotel and ancillary facilities including an executive conference center, hotel administrative offices, professional offices, a five-story parking structure, retail uses, and hotel restaurants. The project site and surrounding lands are relatively flat, with a very slight slope, climbing to the northwest.

The land uses of adjacent properties vary considerably. Immediately to the west is the former Robinson's-May Department store and associated parking lot. The Los Angeles Country Club South is located just west of the Beverly Hills Triangle. The 16th hole of the course abuts the Beverly Hills Triangle properties and is considered a shade-sensitive land use property.

North of the project site, Wilshire Boulevard is paralleled by Beverly Gardens Park, a public landscaped linear parkway along the north side of the parkway. The Park is bordered by single-family residences to its immediate north. El Rodeo School, a public elementary school, is located just northwest of the project site. The southeast corner of the school grounds contain basketball courts and a playfield. The El Rodeo School, Beverly Gardens Park, and private residences north of the Beverly Gardens Park are shade-sensitive land uses.

South and east of the project site is a mix of medium density commercial, medical, and residential buildings. None of these properties are identified as shade-sensitive land uses with respect to the proposed project, due to property uses and orientation with relation to the project site and solar angles.

Four shade-sensitive land uses have been identified with respect to the proposed project.

- a) The Los Angeles Country Club South (16th hole grounds, specifically) west of the project site,
- b) The Beverly Gardens Park north of the project site, across Wilshire Blvd to the north,
- c) The El Rodeo School northwest of the project site, and
- d) The private residences bordering Beverly Gardens Park, north of the project site.

The locations of the sensitive land uses are shown in Figure 5.

Shade/shadow diagram analyses were conducted for the Winter and Summer Solstices and Spring and Autumn Equinoxes. The Winter Solstice shadow diagrams are shown in Figures 6a through 6d, depicting the areas shaded by the proposed project every half-hour from 9 AM to 3:30 PM. The Autumn/Spring Equinox shadow diagrams are shown in Figures 7a through 7c for hours 8 AM through 4 PM. Figures 8a through 8c include the shadow diagrams for the Summer Solstice for hours 8 AM through 5 PM.

The diagrams illustrate the differences between the approved Project and the Modified Project using a coloring scheme. The shaded regions common to both configurations are highlighted in dark gray. The areas shaded by the Residences A and B towers in the Project are highlighted in yellow and in the diagrams. The areas shaded by the Modified Project's consolidated 26-story residence tower are highlighted in blue. The shaded area where the shadows from the approved Project and Modified Project shadows overlap is highlighted in green.

The El Rodeo School and private residences were analyzed for shadow under the approved and Modified Projects. Winter Solstice shading typically represents the worst-case shading

that occurs during a full day in any given year, characterized by elongated shadows due to the low solar angle. At 9 AM the elongated shadow from the Modified Project tower shades a portion of the El Rodeo School property. The Modified Project shadow generally fills the same shadow footprint as the Project shadow. By 10 AM the El Rodeo School is no longer shaded as the project shadow has moved east of the School. Given shadowing occurs for less than one hour and its extent is similar to the Project, the project-related shading is not a substantial change and would not cause a significant impact at the El Rodeo School.

Like the Project, the Modified Project shadow affects private residences north of the Beverly Gardens Linear Park under Winter Solstice conditions briefly for short periods. Single residences are shaded briefly at 10 AM, 2 PM, and 3 PM. During Winter Solstice conditions, the already under construction east luxury hotel shadow shades the residences on Carmelita Avenue for short periods. No single private residence is shaded by the Modified Project for more than an hour. The Modified Project shadow generally fills the same footprint as the Project during the morning hours. In the afternoon hours, the Modified Project shadow footprint is elongated in comparison to the approved Project Residence B shadow, but the elongated shadow affects no Beverly Gardens residences for more than an hour. None of the private residences are shaded for three or more hours during the day. There is no substantial change from the approved Project because all shadow impacts at the private residences due to Modified Project-related shading are similar to that from the approved Project.

The Beverly Gardens Linear Park was analyzed for differences in shading impacts. Portions of the Beverly Gardens Linear Park are shaded under Winter Solstice conditions by shadows in both the Project and Modified Project. At 9 AM and 10 AM the Modified Project shadow generally fills the same shaded area as that from the Project. The Modified Project tower shadow progresses eastward along the Park through the day, affecting a small portion of the park continuously. Although the position of the shadow differs, the fraction of the Park shaded by the Modified Project shadow is similar to the fraction shaded by the Project during all periods.

The Park was also analyzed for differences in shade under the approved and Modified Project. The Park is also shaded by the luxury hotel shadow during Winter Solstice conditions. A small portion of the park at the intersection of Carmelita Avenue and Wilshire Boulevard is continuously shaded by the luxury hotel shadow from 10 AM until noon and again by the Modified Project residential tower at 2 PM. Although shading may occur for more than three hours at a small portion of the park, it is not a substantial change from the EIR and would not be considered a significant impact because the majority of the Park is unshaded at these times providing alternative sunlit locations for Park occupants and no particular area is continuously shaded for more than three hours. There is no substantial change from the approved Project because Modified Project-related shadowing of the Park is similar to that from the approved Project.

The Los Angeles Country Club was analyzed for shade under the approved and Modified Projects. The Autumn and Spring Equinox analysis is representative of average daily shading over the year. At 8 AM the Modified Project shadow extends over a portion of the Los Angeles Country Club 16th hole grounds. The Modified Project shadow covers different areas of the 16th hole grounds compared to the approved Project. The period of shading is brief, affecting the 16th hole for no more than an hour. Therefore, there is no substantial change from the approved Project in shadow impacts. All project-related shadow has moved off of

the 16th hole by 10 AM. For the remainder of the day during Equinox conditions, the Modified and approved Project shadows do not shade any sensitive land uses.

The Summer Solstice analysis is representative of conditions when the sun reaches its highest angle at noon during a year. Elongated shadows can occur just after sunrise and just before sunset. At 8 AM and 9 AM the Modified Project shadow is elongated in comparison to the approved Project Residence Tower B shadow. At these times the Modified Project shadow covers a different portion of the Los Angeles Country Club 16th hole grounds compared to the combined portion of the grounds covered by the Approved Project. However, the portion of the grounds shaded is small and shading is brief. The approved and Modified Project-related shadow has moved off of the 16th hole by 10 AM. Therefore, there is no substantial change from the approved Project in shadow impacts at the 16th hole sensitive land use. For the remainder of the day during Summer Solstice conditions, the Modified and approved Project shadows do not shade any sensitive land uses.

In summary, the Modified Project will not result in a substantial change of shade and shadow impacts compared to the Approved Project.

Cumulative Impacts

The EIR noted that most projects planned for the City of Beverly Hills would be too far from the project site to be visible from the sensitive land uses. The adjacent 9900 Wilshire project was identified as the only project with potential to cause cumulative impacts in conjunction with the proposed project. The EIR determined that the approved Project and 9900 Wilshire Project would shade off-site land uses, including the school and residences north of Wilshire, at different times of day. No single land use would be shaded for more than three hours as a result of the combined shading effects of the two projects. The Modified Project shadow generally follows the same path as the proposed Residence B condominium building shadow (the Modified Project tower footprint is within the general area as the Residence B building). Therefore, the Modified Project shadow would also shade off-site land uses at different times of day as the 9900 Wilshire Project. It can be concluded from the analysis that the shading impacts of the Modified Project, considered together with the 9900 Wilshire project, would be less than cumulatively considerable and therefore not significant.

2.1.2 Air Quality

The impacts on air quality were evaluated in the EIR based on the following significance criteria. A significant impact would occur if the project would:

- Conflict with or obstruct implementation of the applicable air quality plan?
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions, which exceed quantitative thresholds for ozone precursors)?
- Expose sensitive receptors to substantial pollutant concentrations?
- Create objectionable odors affecting a substantial number of people?

Impacts from Project

The EIR analyzed potential impacts during construction and operation of the Project due to emissions of volatile organic compounds (VOCs), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), and particulate matter (PM₁₀ and PM_{2.5}). The analysis compared impacts to the South Coast Air Quality Management District's (SCAQMD's) mass daily emissions significance thresholds and localized significance criteria for construction and operation. Based on this analysis, the EIR concluded that the only significant impacts were related to mass daily emissions of NO_x and 24-hour PM₁₀ and PM_{2.5}. All other impacts were determined to be less than significant. The impacts are summarized in Table 2 and additional detail is provided in Table 3.

Impacts from Modified Project

The Modified Project will not result in any substantial changes in air quality impacts compared to the Project. The key parameters related to the air quality analysis that are expected to change in the Modified Project compared to the Approved Project consist of the following.

1. The general construction phasing is expected to change and will include a reduced number of overlapping construction activities (see Table 4 and Table 5);
2. Certain construction phases will no longer be required to construct the Modified Project;
3. Certain construction phases have already been completed;
4. The Modified Project would use low-VOC paint (50 g/L or less) for architectural coatings such as exterior and interior paint;⁹
5. The same number of residential units will be located in one tower rather than two towers;
6. The number, capacity, and location of below-grade parking is expected to remain the same; and
7. The number of trips expected during the operation of the project is not expected to change.

Construction Impacts Are Unchanged

The Modified Project will not substantially change the construction air quality impacts identified in the EIR. The EIR concluded that there were significant and unavoidable temporary impacts related to maximum daily emissions of NO_x as well as ambient concentrations of PM₁₀ and PM_{2.5} during construction. All other impacts were less than significant. The maximum daily impacts primarily occurred when demolition of existing buildings and grading on-site overlapped (NO_x, SO_x, PM₁₀, and PM_{2.5}) and when grading for a temporary driveway and construction of the new buildings overlapped (VOC and CO).

The EIR reported maximum daily emissions of each pollutant by activity for each construction year (Table 6). Given the overall similarity to the EIR's construction assumptions, the Modified Project construction emission estimates were based on the Approved Project analyses (Table 7).

⁹ This Project Design Feature does not encompass coatings used for a special application beyond that mentioned above; other coatings may have greater VOC contents.

The Modified Project phasing schedule results in fewer overlapping construction activities. The analysis performed herein uses the construction emission estimates as developed for the Approved Project to estimate the Modified Project emissions by assigning emissions to the similar activity in the Modified Project (note that the phase/stage change but the activities are retained). This is also a conservative approach given the fact that construction equipment fleets are continually being improved through the replacement of older equipment with new equipment that generally have lower emission characteristics.

The Modified Project construction emissions will not result in a substantial change from the Approved Project (Table 8). As shown in Table 8, the Modified Project results in a decrease in emissions of VOC, NO_x, PM₁₀, and PM_{2.5}, no change to SO_x, and a slight increase in emissions of CO. The overall impact of NO_x emissions is reduced, but still remains significant, as it was for the Approved Project. The increase in CO emissions of 3 pounds per day is not substantial and does not result in a new significant impact when compared to the SCAQMD thresholds.

This estimate conservatively incorporates the assumptions used in the EIR's analysis, namely that all equipment and activities would occur simultaneously over the day and that activities would overlap. This is unlikely to actually occur as most equipment would operate only a portion of the day and all of the construction activities would not likely overlap.

The Modified Project is also not expected to have a substantial change as it relates to the construction localized significance thresholds (LST). The EIR analyzed the impacts on local concentrations and the potential for the Approved Project to increase concentrations above the criteria approved by the SCAQMD. The EIR concluded that there were significant and unavoidable impacts due to 24-hour concentrations of PM₁₀ and PM_{2.5} (Table 9). As discussed above, the maximum impacts from PM₁₀ and PM_{2.5} occur when demolition of existing buildings and grading on-site overlapped. The maximum impacts from PM₁₀ and PM_{2.5} in the Modified Project occur when grading occurs. The Modified Project reduces the overlap of construction phases, and the grading does not overlap with any other activities. Therefore, the maximum daily PM₁₀ and PM_{2.5} emissions in the Modified Project are less than the maximum set forth in the EIR (Table 8). Accordingly, the maximum impact at the sensitive receptors are also expected to be reduced.

Operational Impacts Are Unchanged

The Modified Project will not result in a substantial change to operational emissions when compared to the Project. The EIR concluded that there were no significant impacts related to maximum daily emissions, ambient concentrations, and CO hotspots (see Table 2 and Table 3). The consolidation of the two towers into one is anticipated to reduce potential natural gas usage due to the reduction in common space for one tower compared to that for two towers. Because the square footage, the number of units and associated amenities will be the same for the Modified Project, the natural gas usage is not expected to increase. Furthermore, the Modified Project traffic trips are expected to remain the same as the Approved Project, and, thus, there is no anticipated change related to the operational traffic/mobile emissions. Thus, the total emissions from the modified Project are expected to be similar to (or less than) the Approved Project.

The Modified Project will not result in a substantial change as it relates to the CO hotspots analysis. The EIR analyzed the impacts of emissions associated with traffic and the potential of the Project to generate CO hotspots. The EIR's analysis found that the highest CO 1-hour

and 8-hour concentration would be 0.11 ppm and 0.08 ppm, respectively, above ambient conditions at the sensitive receptors. The sensitive receptors closest to the project include residential areas to the north of the project site and the El Rodeo Elementary School to the north. The residential receptors are located the same distance from the project site as in the Project. The Residential Building will be located at the site originally proposed for Residences B; the parking structures originally located under Residences A and Residences B will remain in the same location. Thus, any impacts at these sensitive receptors are expected to be similar as that in the approved Project.

Health Impacts Are Unchanged

The EIR concluded that there would be no measurable health impacts due to the exceedance of the significance criteria for maximum daily emissions of NO_x or for ambient concentrations of PM₁₀ and PM_{2.5}. Because the Modified Project reduces NO_x, PM₁₀, and PM_{2.5} emissions, the Modified Project is expected to result in similar, or reduced, health impacts from construction.

The Modified Project will not result in any substantial change to air quality impacts for construction, operations, or health impacts.

2.1.3 Cultural Resources

The impacts on cultural were evaluated in the EIR based on the following significance criteria. Would the project:

- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
- Disturb any human remains, including those interred outside of formal cemeteries?

Impacts from Project

The EIR analyzed potential impacts to historical resources, archaeological resources, and paleontological resources. Based on this analysis, the EIR concluded that there were less than significant impacts to archaeological resources and paleontological resources and significant and unavoidable impacts to historical resources after mitigation (Table 11).

The EIR concluded that the removal of certain portions of the existing hotel and development of the east luxury hotel would result in significant and unavoidable impacts. Specifically, the EIR found that "the proposed new Waldorf Astoria Hotel would result in material impairment of the resources immediate surroundings..." (EIR, at 4.3-40.)

Impacts from Modified Project Are Unchanged

The Modified Project will not result in any substantial changes in cultural resources impacts compared to the Approved Project. The key parameters of the Modified Project related to cultural resources compared to the Project include the following.

1. The elimination of the already approved 8-story tower along Wilshire Boulevard and consolidation of remaining residential units in the already approved 18-story tower along Santa Monica Boulevard to increase it to 26-stories.

No additional demolition or removal of historic resources is expected due to the Modified Project. No archaeological or paleontological resources have been identified on site and no new activities that may disturb these resources have been proposed for the Modified Project. All of the mitigation measures from the EIR (CR-1 through CR-5) will remain in effect. Thus, the impacts from the Modified Project will remain similar to the Project.

The Modified Project will not result in any substantial change to cultural resources impacts and no new significant impacts on historic resources will be created.

2.1.4 Greenhouse Gases

The impacts on greenhouse gases were evaluated in the EIR based on the following significance criteria.

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Impacts from Project Are Less Than Significant

The EIR qualitatively analyzed the Project for consistency with the programs and regulations intended to achieve the statewide goals of reducing greenhouse gases (GHGs) under Assembly Bill 32 (AB 32). The EIR analysis compared the project design features and mitigation measures to the strategies identified by the Climate Action Team to meet AB 32 goals (see Table 12). Based on this analysis, the EIR concluded that there would be no cumulatively considerable impacts due to GHGs.

Impacts from Modified Project Are Unchanged and Are Less Than Significant

The Modified Project will not result in any substantial changes in GHG impacts analyzed in the EIR. The key parameters of the Modified Project related to the greenhouse gas analysis compared to the Approved Project consists of:

1. The general construction phasing is expected to change and will include a reduced number of overlapping construction activities;
2. Certain construction phases will no longer be required to construct the Modified Project;
3. Certain construction phases have already been completed;
4. The overall duration of construction will increase;
5. The same number of residential units located in one tower rather than two towers;
6. The number, capacity, and location of parking structures is expected to remain the same; and
7. The number of trips expected during the operation of the project is not expected to change.

Construction Impacts Are Unchanged and Are Less Than Significant

The Modified Project will not substantially change the construction GHG impacts identified in the EIR. The EIR concluded that the GHG impacts were not cumulatively considerable.

The Modified Project will not result in a substantial change in GHG emissions. As discussed in Section 2.1.2, construction activities are expected to be similar to those analyzed in the EIR. The total duration of construction will also be the same, 50 months (although some construction activities have already been completed). Because the construction activities and duration are similar, the GHG emissions due to construction activities are also expected to be similar. Thus, there is no substantial change in GHG impacts from the Modified Project as compared to the Approved Project.

Operational Impacts Are Unchanged and Are Less Than Significant

The Modified Project will not result in a substantial change to operational GHG impacts when compared to the EIR's analysis. The consolidation of the two towers into one is anticipated to reduce potential natural gas usage due to the reduction in common space for one tower compared to that for two towers. Because the number of residential units and associated amenities will be the same for the Modified Project, the natural gas and electricity usage is not expected to increase. Furthermore, the Modified Project traffic trips are expected to remain the same or be less than that analyzed in the EIR, and, thus, there is no anticipated change related to the operational traffic/mobile emissions. The Modified Project emissions would be expected to be less than those analyzed in the EIR because the fleet mix has improved over time as older vehicles are replaced by newer, more efficient, vehicles. Thus, the current analysis conservatively has assumed that the Modified Project operational impacts will be similar to the Approved Project.

The Modified Project will not result in any substantial change to GHG impacts.

2.1.5 Land Use and Planning

The impacts on land use planning were evaluated in the Approved Project's EIR based on the following significance criteria.

- Would the project physically divide an established community?
- Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?
- Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Impacts from Project

The EIR analyzed potential impacts to land use and planning. The Project was found to be consistent with the Housing Element, Open Space Element, Scenic Highway Element, Noise Element, Safety Element, and Seismic Safety Element of the General Plan. However, the Project was found not to be entirely consistent with the Land Use and Conservation Elements of the General Plan. Therefore, the EIR concluded that there were significant and unavoidable impacts to land use and planning after mitigation (Table 13).

Impacts from Modified Project Are Unchanged

The General Plan has been updated since the Project was approved. Under the current General Plan, the Modified Project will not result in any substantial changes to land use and planning impacts compared to those analyzed in the EIR. In fact, the Modified Project is more consistent with the General Plan as it exists today than when the Project was originally approved.

The Modified Project will be consistent with the City of Beverly Hills General Plan and will not demolish any historic resources or other structures as identified in the City of Beverly Hills General Plan. While the increase in both project density and building heights has already been analyzed was found to be a significant impact, it is not clear that it would be considered a significant impact under today's General Plan.

The Modified Project is consistent with various Goals and Policies of the General Plan. For example, LU 2.7 encourages exploring "[o]pportunities for public improvements and private development to work together to enhance the sense and quality of entry at key gateways into the City." (Beverly Hills General Plan, Land Use Element, LU 2.7, at 23.) LU 9.3 recommends that "anchor locations be set aside to permit development of a higher intensity type of development...These areas should be located...close to the City's major streets. These anchor locations should include those larger parcels that are located at the gateways to the City, such as the site at 9900 Wilshire Boulevard where additional building height is appropriate." (Beverly Hills General Plan, Land Use Element, LU 9.3, at 31.) Also LU 16.4 recommends providing "[p]lazas, open spaces, and other outdoor improvements that are accessible to and used for public gatherings and activities, either through capital improvement or as a development requirement." (Beverly Hills General Plan, Land Use Element, LU 16.4, at 40.) "Relatedly, the General Plan directs that the City shall "[p]rotect, enhance and expand open space resources..." (OS 1), "[r]equire extensive landscaping of open space areas on a property to provide the maximum permeable surface area to increase infiltration, reduce site runoff, control the overland migration of silt, and reduce the amount of surface paving. Provide guidance to property owners on recommended water efficient plant materials (OS 5.6), "[r]equire that new development be located and designed to visually complement the urban setting by providing accessible, landscaped entires, courtyards, and plazas (OS 6.3), "[r]equire developers of large scale new commercial or residential projects that exceed the base FAR to provide on-site open space...accessible to the public" that "consistent of public urban plazas or squares where there is the capability for passive and active recreation and outdoor activity" (OS 8.2.), and "[e]ncourage and allow opportunities for new development to provide small plazas, pocket parks, civic spaces, and other gathering places that are available to the public to help meet recreational demands." (OS 8.5) Located at a major gateway to the City along Santa Monica and Wilshire Boulevards, the Modified Project is consistent with the City's goals of creating an anchor location at this site and the creation of substantial open space on Wilshire Boulevard and placement of additional height on Santa Monica Boulevard is consistent with these goals.

In all events, the Modified Project will not have substantial changes when compared to the Approved Project with respect to land use and planning impacts.

2.1.6 Noise

The Approved Project's noise impacts were evaluated in the EIR based on the following significance criteria. The Approved Project would have a significant impact on noise if it caused any of the following.

- Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- Exposure of person to or generation of excessive groundborne vibration or groundborne noise levels;
- A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project;
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels; and
- For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Impacts from Project

The EIR analyzed potential noise impacts during construction and operation. The analysis assessed these impacts by considering potential increases in sound levels over ambient levels during construction outside of the hours permitted by the City's noise ordinance (i.e., between 6 PM and 8 AM), construction-related vibrations affecting nearby receivers, exposure of interior or exterior spaces above suitability levels, and increases in sound levels due to traffic or stationary sources above ambient levels. Based on this analysis, the EIR concluded that the significant and unavoidable impacts were related to construction noise and vibration (Table 14 and Table 15). The EIR concluded that there would be no operational noise impacts.

Impacts from Modified Project Are Unchanged

The key parameters related to noise that are expected to change in the Modified Project compared to the Approved Project consist of the following.

1. The general construction phasing is expected to change and will include a reduced number of overlapping construction activities (Tables 4a, 4b);
2. Certain construction phases will no longer be required to construct the Modified Project;
3. Certain construction phases have already been completed;
4. The single residential building will be adjacent to Merv Griffin Way and Santa Monica Boulevard and not along Wilshire Boulevard and Merv Griffin Way;
5. Rooftop mechanical units are expected to be in similar locations with similar capacities, except no rooftop mechanical units would be necessary for Residences A;
6. The hotel pool for the existing hotel will be moved to the north side of the property adjacent to Wilshire Boulevard;

7. The open space and garden area proposed for the northwest portion of the property will be larger than previously proposed;
8. The number, capacity, and location of parking structures is expected to remain the same; and
9. The number of trips expected during the operation of the project is not expected to change.

Construction Impacts Are Unchanged

The Modified Project would have a similar level of construction activity, with worst-case levels of construction noise remaining similar to that identified for the Approved Project (Table 16). Thus, the Modified Project would not have a substantial change in construction noise impacts. Implementation of MM-NOISE-1 would remain in effect for the Modified Project.

Noise impacts identified for other aspects of construction of the Modified Project would not have a substantial change from those identified in the EIR. These other aspects include construction-related traffic noise, noise from interior construction activities, construction vibration, and cumulative construction activities with the 9900 Wilshire Project.

While noise impacts are conservatively assumed to remain significant, the impacts are likely to be reduced as compared to those analyzed in the EIR with the elimination of the residential tower adjacent to Wilshire Boulevard. The construction of a single residential building along Santa Monica Boulevard and farther away from El Rodeo School and the single-family neighborhood to the north of the Project Site will likely reduce noise impacts on those uses.

Operational Impacts Are Unchanged and Are Less Than Significant

The Modified Project would not have a substantial change in noise impacts from traffic. The Modified Project traffic volumes will be similar to the Project and those volumes analyzed in the EIR and, therefore, off-site noise impacts would be less than significant.

The Modified Project would also not have a substantial change in noise impacts from mechanical equipment. The Modified Project is expected to have a similar location and capacity of rooftop mechanical equipment on one tower and will eliminate such equipment slated for the rooftop of the tower previously approved for Wilshire Boulevard. Thus, any noise impacts from mechanical equipment would be reduced on El Rodeo School and the single-family home neighborhood to the north of the Project Site. Parking structures with the Modified Project will remain subterranean and, therefore, are expected to be similar to those identified in the EIR. The Modified Project will not have a substantial change in noise impacts for either of these sources compared to the Approved Project and will continue to be less than significant.

Under the Project, outdoor events spaces are located in the northern portion of the site. The Beverly Hilton hotel pool will be relocated to the area of one of these outdoor event spaces. An outdoor garden will also replace the approved 8-story building at Wilshire Boulevard and Merv Griffin Way. Outdoor events may occur within the garden area at an area previously approved for events. The potential for noise impacts from these sources is discussed below.

Pool Noise – The new Beverly Hilton pool would be located on the north side of the project site. Sounds from typical outdoor pool activities could potentially affect off-site receivers

nearest the pool. The pool would be located on a terrace approximately 21 feet above grade with an 8-foot tall transparent barrier on the north, west, and southwest edges of the pool terrace. The nearest sensitive receivers to the pool are residences directly north, El Rodeo Elementary School to the northwest, and the proposed new residences to the southwest at 9900 Wilshire Boulevard. Using a representative sound level for outdoor pool activities of 54 dBA Leq at 30 feet and assuming standard distance attenuation, pool-related noise levels were estimated at the nearest sensitive receivers.^{10, 11}

As shown in Table 17, the estimated sound levels of pool noise at the nearest sensitive receivers are much lower than the lowest existing daytime and nighttime sound levels and would not result in noise impacts to these receivers. Additional reduction due to the transparent noise barrier around the pool was not considered, so the actual pool sound levels would be even lower than estimated. Therefore, the Modified Project would not result in a substantial change in noise impacts due to the changed location of the pool as it relates to "pool noise".

Outdoor Events – Outdoor events with amplified music (e.g., weddings) may occur either on the pool terrace or in the northwest garden space. As with the Project, the Modified Project will be subject to the City's Noise Ordinance. Section 5-1-201 of the Beverly Hills Municipal Code restricts the use of sound amplifying equipment within a residential zone between 10 PM and 8 AM if it is distinctly audible at or beyond the property line of the property on which the equipment is located.

An 8-foot high transparent barrier would be constructed on the north, west, and southwest edges of the pool terrace. The nearest off-site sensitive receivers to the outdoor events are residences directly north, El Rodeo Elementary School to the northwest, and new residences to the southwest at 9900 Wilshire Boulevard. Representative sound levels (L25s) at a distance of 50 feet from outdoor events with amplified music range from approximately 58 dBA at 50 feet for an event with 80 guests to 68 dBA for an event with 200 guests.¹²

As shown in Table 18, the estimated sound levels of outdoor event noise are less than or equal to the lowest measured sound levels between 8 AM and 10 PM (outdoor events with amplified music would be restricted to these hours) and would not result in a substantial change in noise impacts compared to those analyzed in the EIR. Again, additional reduction potentially due to noise barriers and buffers around the pool terrace and on the north edge of the garden space was not considered, so the actual outdoor event sound levels at receivers north of the site are expected to be somewhat lower than shown in Table 18.

2.1.7 Transportation and Traffic

The impacts on transportation and traffic were evaluated in the EIR based on the following significance criteria. A significant impact was deemed to occur if the project would cause or result in any of the following.

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components

¹⁰ Nevada County, Rincon del Rio Draft Environmental Impact Report, January 2012, Page 3.11-27.

¹¹ Noise from point sources attenuates due to distance by approximately 6 dB per every doubling of distance

¹² Illingworth & Rodkin, Inc. Analysis and Simulation of Outdoor Event Noise, CS2 Winery, Yountville, CA. May 30, 2014.

of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
- Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Result in inadequate emergency access?
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Impacts from Project Are Less Than Significant

The EIR analyzed potential impacts to transportation and traffic including construction and operation traffic, intersections, public transit, bicycle, and pedestrian facilities, parking and circulation. The EIR concluded that there were less than significant impacts to transportation and traffic after mitigation (Table 19).

Impacts from Modified Project Are Unchanged And Are Less Than Significant

The Modified Project will not result in any substantial changes related to transportation and traffic after mitigation measures have been incorporated. Impacts remain less than significant.

The Modified Project will result in the same level of daily traffic, volume to capacity (V/C) ratios, and levels of service during construction and operation as analyzed in the Approved Project.¹³ No additional trips are expected due to the Modified Project because the unit count remains unchanged. While the number of trips remains the same, the elimination of a driveway and turnout on Merv Griffin Way may improve traffic flow by eliminating opportunities for conflict caused by slowing and turning vehicles. All mitigation measures from the EIR applicable to these impacts (TRAF-1 through TRAF-8) will remain in effect. Thus, the Modified Project will not have substantial changes compared to the Approved Project and impacts on transportation remain less than significant.

In sum, the Modified Project would result in no new significant impacts as compared to the Approved Project. The Modified Project would reduce previously identified impacts in certain impacts and other impacts would remain the same.

2.2 Other Impact Areas

This section discusses the remaining environmental areas that were not found to be potentially significant in the EIR. Like the Approved Project, the Modified Project would not result in a significant impact in any of the following impact areas.

¹³ Overland Traffic Consultants, Inc. 2016. Traffic Evaluation for the Proposed Site Modifications (The Beverly Hills Garden and Open Space Initiative). March 30, 2016.

2.2.1 Agricultural and Forestry Resources

The EIR concluded that no significant impacts related to agricultural and forestry resources were expected because the project site is located in an established urbanized area with no farmland, was zoned C-3 (commercial), and would not support a conversion to farmland.

The Modified Project is located in the same area, does not include any changes to potential or existing farmland, and does not alter the approved zoning. Thus, there are no substantial changes related to agricultural or forestry resources from the Modified Project and the Modified Project would result in no significant impacts to agricultural or forestry resources.

2.2.2 Biological Resources

The EIR concluded that no significant impacts related to biological resources were expected because the project site is located in an established urbanized area currently occupied by a hotel, conference facilities and offices, restaurant, and parking structures. No threatened or endangered species, wetland habitats, wildlife corridors, or other biological resources are known to exist on the site.

The Modified Project is located in the same area, does not include any changes to species or potential or existing habitats or corridors. Thus, there are no substantial changes from the Modified Project and the Modified Project would result in no significant impacts to biological resources.

2.2.3 Geology and Soils

The EIR analyzed potential impacts to geology and soils. Based on this analysis, the EIR concluded that there were less than significant impacts to geology and soils after mitigation (Table 20).

The Modified Project will not result in any substantial changes related to geology and soils.

The Modified Project is located in the same area and does not include any additional demolition or deeper excavation due to the Modified Project. No new faults or hazardous zones have been identified on the Project Site. The mitigation measure from the EIR (GEO-1) will remain in effect. Thus, there are no substantial changes from the Modified Project and the Modified Project would result in no significant impacts to geology or soils.

2.2.4 Hazards and Hazardous Materials

The EIR analyzed potential impacts due to hazards and hazardous materials. Based on this analysis, the EIR concluded that there were less than significant impacts due to hazards and hazardous materials after mitigation (Table 21).

The Modified Project will not result in any substantial changes related to hazards and hazardous materials.

The Modified Project is located in the same area and does not include any additional demolition of structures or deeper excavation due to the Modified Project. No new hazardous materials are expected to be found on site, and no new hazardous sites have been identified near the project area. All of the mitigation measures from the EIR (HAZ-1 through HAZ-7) will remain in effect. Thus, there are no substantial changes due to the Modified Project and the Modified Project would result in no significant impacts to hazards or hazardous materials.

2.2.5 Hydrology and Water Quality

The EIR analyzed potential impacts to hydrology and water quality. Based on this analysis, the EIR concluded that there were less than significant impacts to hydrology and water quality (Table 22).

The Modified Project will not result in any substantial changes related to hydrology and water quality.

The Modified Project has similar types of construction activities leading to potential soil erosion and temporary increase in suspended solids in surface water flows. The number and type of subterranean buildings and structures remains similar, and thus the dewatering and associated impacts to downstream water quality remains similar. The amount of pervious surfaces on site are expected to increase, which will reduce the amount of any potential run-off, and no additional impacts on surface hydrology and stormwater drainage are expected. All mitigation measure from the EIR (HYDRO-1 through HYDRO-4) will remain in effect. Thus, there are no substantial changes due to the Modified Project and the Modified Project would result in no significant impacts to hydrology or water quality.

2.2.6 Mineral Resources

The EIR concluded that no significant impacts related to mineral resources were expected because no mineral resources of value are known to be located with the project area, other than petroleum.

The Modified Project is located in the same area, does not include any changes to petroleum policies or resource recovery, and no new mineral resources have been identified in the area. Thus, the Modified Project will not result in any significant impacts to mineral resources.

2.2.7 Population and Housing

The EIR analyzed potential impacts due to population and housing. Based on this analysis, the EIR concluded that there were less than significant impacts due to population and housing (Table 23).

The Modified Project will not result in any substantial changes related to population and housing.

The Modified Project is located in the same area and includes the same number of residential units. No additional residents are expected to move to the area due to the Modified Project. Thus, the Modified Project will not have any substantial changes and the Modified Project would result in no significant impacts on population or housing resources.

2.2.8 Public Services

The EIR analyzed potential impacts to public services including fire protection, emergency services, police protection, schools, recreation and parks, and library services. Based on this analysis, the EIR concluded that there were less than significant impacts to public services (Table 24).

The Modified Project will not result in any substantial changes related to public services.

The Modified Project will generate a similar demand for public services as that analyzed in the EIR. No additional residents are expected due to the Modified Project because the total unit count remains the same. Therefore, no additional public services will be needed. No mitigation measures were identified in the EIR. Thus, the Modified Project will not result in

any substantial changes and the Modified Project would result in no significant impacts to public services.

2.2.9 Utilities and Service Systems

The EIR analyzed potential impacts to utilities and service systems, including water, wastewater, solid waste, energy, and natural gas. Based on this analysis, the EIR concluded that there were less than significant impacts to public services after mitigation (Table 25).

The Modified Project will not result in any substantial changes related to public services.

The Modified Project will generate a similar demand for utilities and service systems as that analyzed in the EIR. No additional residents are expected due to the Modified Project and no additional demand for utilities and services systems will be generated. All mitigation measures from the EIR applicable to these impacts (WTR-1, WW-1, and ENG-1 to ENG-2) will remain in effect. Thus, the Modified Project will not result in substantial changes and the Modified Project would result in no significant impacts to utilities or service systems.

3. REFERENCES

- California Air Resources Board (CARB). 2007. In-use Off-Road Diesel Vehicle Regulation. Available at: <http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm>. Accessed: February 2016.
- Illingworth & Rodkin, Inc. *Analysis and Simulation of Outdoor Event Noise, CS2 Winery, Yountville, CA*. May 30, 2014
- Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan.
- Nevada County, Rincon del Rio Draft Environmental Impact Report, January 2012, Page 3.11-27.
- South Coast Air Quality Management District (SCAQMD). 2009. Table III – Mitigation Measures: Level 1, 2, and 3 Retrofits for Off-road Engines. Available at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies/off-road-engines>. Accessed: January 2016.

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Environmental Assessment of the Beverly Hills Garden
and Open Space Initiative
Beverly Hills, California

TABLES

Table 1. Summary of Aesthetics Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Visual Character and Quality		
New residential land uses on the project site where none currently exist, increased development intensity, and building heights would conflict with General Plan Land Use Element Objective 3, "Areas of Transitional Conflict," and Objective 4, "Scale of the City," and with Land Use Element development criteria recommending compatibility between commercial and residential areas. This would alter the visual character and quality of the site and its surroundings and is a potentially significant impact.	No feasible mitigation available.	Significant and Unavoidable
The proposed project, considered together with the 9900 Wilshire project, could result in cumulatively significant impacts on the visual character and quality of the project area.	No feasible mitigation available.	Significant and Unavoidable
Views		
Evaluation of views from ten viewpoints showed that impacts would be less than significant at eight viewpoints. Project implementation would adversely affect views of The Beverly Hilton from the intersection of Wilshire and Santa Monica Boulevards (Viewshed Four) and west-facing panoramic views from the hotel's Wilshire Tower guestrooms (Viewshed 10). These are potentially significant impacts.	No feasible mitigation available.	Significant and Unavoidable
Project implementation would create new panoramic views from buildings on the project site. Views of El Rodeo School would have a less than significant effect on privacy at that location.	No mitigation required.	Less Than Significant
The proposed project, considered together with the 9900 Wilshire project, could result in cumulatively significant impacts on valued panoramic views from the hotel's Wilshire Tower guestrooms.	No feasible mitigation available.	Significant and Unavoidable
Light and Glare		
Project implementation would increase ambient nighttime light levels on the project site and illuminated buildings and outdoor areas on site would be visible from some off-site vantages. The potential for unshielded or misdirected light sources to adversely affect nighttime views is a significant impact.	LG-1: Project light sources shall be shielded, directed downward when intended to illuminate walking or working surfaces, and focused on the project site, to prevent light spillover onto adjacent properties or roadways.	Less Than Significant
Building materials would be low-reflectivity and are intended to minimize glare. Glare impacts would be less than significant.	No mitigation required.	Less Than Significant
The Beverly Hilton Revitalization Plan, considered together with the 9900 Wilshire project, could result in a cumulatively considerable, and therefore significant, contribution to lighting impacts as the result of a substantial increase in ambient nighttime light levels that adversely affects nighttime views.	See Mitigation Measure LG-1	Less Than Significant

Table 1. Summary of Aesthetics Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Shade and Shadow		
<p>At the Summer Solstice, the project would not have adverse shade effects on off-site shade-sensitive land uses and impacts would be less than significant.</p> <p>At the Winter Solstice, when shadows are longest, the 9900 Wilshire property would be shaded until approximately 8:30 AM. The Residence A building and Waldorf Astoria Hotel building would partially shade residences along Whittier Boulevard, Trenton Drive and Carmelita Avenue for a short durations. The project would shade different segments of Beverly Gardens Park at different times of the day, but no single segment of the park would be shaded by the project for more than approximately 2 hours. A classroom/administration building in the southern portion of El Rodeo School's campus would be shaded prior to 8:00 AM. Outdoor recreational facilities in the southeastern corner of campus would be shaded from approximately 7:30 AM until 10:00 AM, with only a small area affected after 9:00 AM. Shading impacts at the Winter Solstice would be less than significant.</p>	<p>No mitigation required.</p>	<p>Less Than Significant</p>
<p>The adjacent Beverly Hilton Revitalization Plan project was not determined to result in significant shadow impacts on off-site land uses, including El Rodeo School to the north. The 9900 Wilshire and The Beverly Hilton Revitalization would shade off-site land uses, including the school, park, and residences north of Wilshire, at different times of day, and no single land use would be shaded for more than three hours as a result of the combined shading effects of the two projects. The shading impacts of the 9900 Wilshire project, considered together with The Beverly Hilton Revitalization Plan project and other related projects, would be less than cumulatively considerable and therefore not significant.</p>	<p>No mitigation required.</p>	<p>Less Than Significant</p>

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan. Table 2.0-1: Summary Table of Project Impacts and Mitigation Measures.

This table incorporates information from the Draft EIR, as well as any changes noted in the Final EIR.

Table 2. Summary of Air Quality Impacts from Final EIR
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Construction		
Mass Daily Emissions		
NO _x	AQ-1 through AQ-14	Significant and Unavoidable
VOC, CO, SO _x , PM ₁₀ , and PM _{2.5}	Not required ¹	Less than significant
Ambient Concentrations		
24-hour PM ₁₀ and PM _{2.5}	AQ-1 through AQ-14	Significant and Unavoidable
8-hour O ₃ , 1- and 8-hour CO, annual NO ₂ , 24-hour and annual SO ₂ , annual PM _{2.5} , and quarterly lead	Not required ¹	Less than significant
Operation		
Mass Daily Emissions		
VOC, CO, SO _x , PM ₁₀ , and PM _{2.5}	Not required ¹	Less than significant
Ambient Concentrations		
8-hour O ₃ , 1- and 8-hour CO, annual NO ₂ , 24-hour and annual SO ₂ , annual PM _{2.5} , and quarterly lead	Not required ¹	Less than significant
Local CO Emissions	Not required ¹	Less than significant
Odor	Not required ¹	Less than significant

Notes:

¹ Although mitigation is not required for these impacts, mitigation measures AQ-1 through AQ-14 would also reduce these impacts.

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan.

Abbreviations:

CO - carbon monoxide

NO_x - oxides of nitrogen

O₃ - ozone

SO_x - sulfur oxide

SO₂ - sulfur dioxide

PM_{2.5} - particulate matter, 2.5 micrometers and smaller

PM₁₀ - particulate matter, 10 micrometers and smaller

VOC - volatile organic compound

Table 3. Summary of Air Quality Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Short-term Construction Impacts		
<p>During the demolition, grading and excavation, and building construction phases of project construction, oxides of nitrogen emissions (NO_x) would exceed established thresholds of significance, even with compliance with South Coast Air Quality Management District (SCAQMD) Rule 403 – Fugitive Dust. This is a potentially significant impact.</p>	<p>AQ-1: The Developer shall prepare a Construction Traffic Emission Management Plan to minimize emissions from vehicles including, but not limited to, scheduling truck deliveries to avoid peak-hour traffic conditions, consolidating truck deliveries, and prohibiting truck idling in excess of 5 minutes.</p>	<p>Significant and Unavoidable</p>
	<p>AQ-2: The Contractor shall ensure that the use of all construction equipment is suspended during first-stage smog alerts.</p>	
	<p>AQ-3: The Contractor shall promote the use of electricity or alternate fuels for on-site mobile equipment instead of diesel equipment to the extent feasible.</p>	
	<p>AQ-4: The Contractor shall maintain construction equipment by conducting regular tune-ups according to the manufacturers' recommendations.</p>	
	<p>AQ-5: The Contractor shall promote the use of electric welders to avoid emissions from gas or diesel welders, to the extent feasible.</p>	
	<p>AQ-6: The Contractor shall promote the use of on-site electricity or alternative fuels rather than diesel-powered or gasoline-powered generators to the extent feasible.</p>	
	<p>AQ-7: Prior to use in construction, the project applicant and contractor will evaluate the feasibility of retrofitting the large off-road construction equipment that will be operating for significant periods. Retrofit technologies such as particulate traps, selective catalytic reduction, oxidation catalysts, air enhancement technologies, etc., will be evaluated. These technologies will be required if they are verified by the Air Resources Board (ARB) and/or the U.S. EPA and are commercially available and can feasibly be retrofitted onto construction equipment.</p>	
	<p>AQ-8: The Contractor shall ensure that traffic speeds on all unpaved roads are reduced to 15 miles per hour or less.</p>	
	<p>AQ-9: The Contractor shall ensure that the project site is watered at least three times daily during dry weather.</p>	
	<p>AQ-10: The Contractor shall install wind monitoring equipment, to the extent feasible, and suspend grading activities when wind speeds exceed 25 miles per hour per SCAQMD guidelines.</p>	
	<p>AQ-11: The Contractor shall water storage piles by hand or apply cover when wind events are declared (wind speeds in excess of 25 miles per hour).</p>	

Table 3. Summary of Air Quality Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Short-term Construction Impacts (continued)	AQ-12: The Contractor shall apply nontoxic chemical soil stabilizers on inactive construction areas (disturbed lands within construction projects that are unused for at least four consecutive days).	
	AQ-13: The Contractor shall replace ground cover in disturbed areas as quickly as possible.	
	AQ-14: The project proponent shall establish a third-party air quality consultant to conduct monitoring of the PM10 (dust) concentrations at one upwind (background) location and one or more downwind receptor locations to determine if such results are in compliance with the established threshold in SCAQMD Rule 403. The monitoring shall be conducted at least one time per week for the duration of the demolition and grading period. The third-party consultant shall be approved by the City of Beverly Hills Planning Department. Sample locations, methods, and sampling duration shall be selected in accordance with Rule 403. To the extent feasible, one downwind monitoring station shall be located at or near the El Rodeo School's southern perimeter. Costs for the monitoring stations and tests by the third-party consultant shall be borne by the project proponent. If any measurements are found by the consultant to exceed the SCAQMD Rule 403 threshold, the project proponent shall submit a corrective action plan to the City of Beverly Hills within 7 calendar days after receipt of the report from the consultant. The corrective action plan shall specify a schedule for ongoing remedial action and implementation shall begin as soon as reasonably practical, as determined by mutual agreement with the City of Beverly Hills.	
Localized Significance Thresholds (LST) - Construction		
The Localized Significance Threshold (LST) analysis shows that maximum 24-hour PM10 (particulate matter less than 10 microns in diameter) and PM2.5 (particulate matter less than 2.5 microns in diameter) concentrations are anticipated to exceed the SCAQMD threshold of significance at the nearest residential and sensitive receptors during construction.	See Mitigation Measures AQ-1 through AQ-14.	Significant and Unavoidable
Criteria Pollutants - Operations		
Summertime and wintertime operational emissions for the proposed project would not exceed SCAQMD established thresholds for volatile organic compounds (VOC), NOX, carbon monoxide (CO), sulfur oxides (SOX), PM10, or PM2.5. Operational air quality impacts would be less than significant.	No mitigation required.	Less Than Significant

Table 3. Summary of Air Quality Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Localized Carbon Monoxide Emissions - Operations		
The CO hotspots analysis demonstrated that the project's CO emissions would not exceed state or federal 1-hour or 8-hour standards at study area intersections. As such, project operations would not interfere with the attainment of the federal or state ambient air quality standard and impacts would be less than significant.	No mitigation required.	Less Than Significant
CO emissions generated by use of the proposed parking structures were modeled as a volume source. Assuming (per the Traffic Study) a maximum of 40 vehicles would enter or exit the residential portion of the parking structure and 415 vehicles would enter or exit the hotel/restaurant portion during the peak hour, CO concentrations would remain below the 1-hour and 8-hour standards. This is a less than significant impact.	No mitigation required.	Less Than Significant
Consistency with SCAG AQMP Population Projections		
Project implementation would create 120 new condominium units, thereby resulting in a population increase of approximately 269 individuals (applying the City of Beverly Hills Population Factor of 2.24 persons/household). The project would not result in population increases in excess of Southern California Association of Governments (SCAG) Air Quality Management Plan (AQMP) projections. Impacts would be less than significant.	No mitigation required.	Less Than Significant
Odors		
Odors generated by the proposed project would be limited to preparation of food for human consumption at the proposed restaurant. However, because food would be prepared in an enclosed kitchen, odors would not be significant.	No mitigation required.	Less Than Significant
Hazardous Materials		
The project will not have hazardous materials on the site and would not be a source of toxic air contaminants regulated by the SCAQMD, state, or federal government. Therefore, no significant impacts are anticipated with respect to toxic air contaminants.	No mitigation required.	Less Than Significant

Table 3. Summary of Air Quality Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Cumulative Impacts		
<p>Uses proposed on the project site would result in an on-site population of approximately 269 individuals. Using employment generation rates published in the 2001 SCAG Employment Density Study, the proposed 191,692 square feet of commercial uses would have no net increase in employees. These figures, along with the project Average Daily Trip (ADT) volume included in the traffic study prepared for the project, SCAG population and employment growth data, and traffic data for the portion of Los Angeles County located within the Basin obtained from the EMFAC2007 on-road motor vehicle emissions model developed by CARB, was used to calculate and compare the ratio of project ADT to anticipated ADT in the area, and the ratios of the project population and employment to the anticipated population and employment in the area. The ADT ratio is less than the population and employment ratios at project buildout in 2012. As such, cumulative impacts would be less than significant based on this criterion.</p>	<p>No mitigation required.</p>	<p>Less Than Significant</p>
<p>In addition to the cumulative significance methodologies contained in SCAQMD's CEQA Air Quality Handbook, the SCAQMD staff has suggested that the emissions-based thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. Individual projects that exceed the SCAQMD-recommended daily thresholds for project specific impacts would be considered to cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As shown in Table 4.2-11, the project's construction emissions would exceed the project-level threshold of significance for NOX, PM10, and PM2.5. Because the Basin is nonattainment for ozone (NOX is a precursor to ozone), PM10, and PM2.5, construction of the project would generate a cumulatively considerable contribution to air quality impacts in the Basin. This is considered a significant and unavoidable impact.</p>	<p>No mitigation required.</p>	<p>Significant and Unavoidable</p>
<p>The project would result in small increases in pollutant emissions (and in the case of CO, emission reductions) relative to the existing uses. This suggests that the project would result in a proportionately small increase in GHG emissions. Based on these findings, the contribution of the project to cumulative GHG emissions is not considered cumulatively considerable.</p>	<p>See Table 10.</p>	<p>Less Than Significant</p>

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan. Table 2.0-1: Summary Table of Project Impacts and Mitigation Measures. This table incorporates information from the Draft EIR, as well as any changes noted in the Final EIR.

Abbreviations:

NO_x - oxides of nitrogen

ADT - average daily trip

CARB - California Air Resources Board

CEQA - California Environmental Quality Act

EMFAC - Emission Factor Model

SCAG - Southern California Association of Governments

SCAQMD - South Coast Air Quality Management District

PM_{2.5} - particulate matter, 2.5 micrometers and smaller

PM₁₀ - particulate matter, 10 micrometers and smaller

Table 4. Approved Project Construction Schedule
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Phase	Description of Project Phase	Approximate Duration (assumes overlap)
1	Demolish Palm/Oasis Court and existing hotel entrance driveway. Construct and begin using first temporary hotel access entrance driveway at present Wilshire Boulevard pedestrian entrance; construct additional temporary access driveway.	8 months
2	Demolish first temporary hotel access driveway, conference center, hotel retail and hotel office uses, lobby bar, exterior courtyard between lobby and Wilshire Boulevard, former Trader Vic's restaurant and associated surface parking, and any subterranean parking facilities. Begin using second temporary driveway.	6 months
3	Construct Waldorf Astoria Hotel building, New Beverly Hilton Hotel Rooms building, new executive conference center, portions of new Beverly Hilton Hotel lobby, and Residence A, plus associated subterranean parking. Begin operation of The Waldorf Astoria Hotel and new Beverly Hilton Hotel rooms, new executive conference center and associated parking. Construct third temporary entrance driveway.	19 months
4	Demolish second temporary entrance driveway and begin use of third temporary driveway. Demolish parking structure, Beverly Hilton pool and terrace, and Cabana/Lanai Rooms building.	4 months
5	Construct Residence B, new Beverly Hilton pool and terrace, and permanent access driveways for Beverly Hilton and Residence A and B buildings.	23 months
TOTAL DURATION		50 months

Table 5. Modified Project Construction Schedule

Beverly Hills Garden and Open Space Initiative

Beverly Hills, California

Project Phase	Description of Project Phase	Approximate Duration (assumes overlap)
1	Demolish hotel retail and hotel office uses, lobby bar, exterior courtyard between lobby and Wilshire Boulevard, and former Trader Vic's restaurant and associated surface parking.	Completed
	Construct Waldorf Astoria Hotel building and temporary access driveway.	20 months (In progress)
2	Demolish conference center, Palm/Oasis Court, existing hotel entrance driveway, any subterranean parking facilities, and temporary access driveway. Construct New Beverly Hilton Hotel conference/hotel facilities addition, new Beverly Hilton Hotel lobby, pool, and terrace, and permanent access driveway for the Beverly Hilton. Begin operation of the Waldorf Astoria hotel.	42 months
3	Demolish second temporary entrance driveway, parking structure, Beverly Hilton pool and terrace, and Cabana/Lanai Rooms building.	9 months
4	Construct Residence Building plus associated subterranean parking. Begin operation of the new Beverly Hilton Hotel conference/hotel facilities addition, and associated parking.	40 months
TOTAL DURATION		50 months

Table 6. Construction Emissions from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Construction Year (Scenario)	Phase/Stage	Description	Emissions (lbs/day)					
			VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2008 (1)	Phase 1, Stage 1	Demolition (Palm/Oasis)	8.16	57.29	65.66	0.01	7.58	3.12
	<i>Total</i>		<i>8.16</i>	<i>57.29</i>	<i>65.66</i>	<i>0.01</i>	<i>7.58</i>	<i>3.12</i>
2008 (2)	Phase 1, Stage 1	Demolition (Palm/Oasis)	8.16	57.29	65.66	0.01	7.58	3.12
	Phase 1, Stage 2	Grading (1st AD)	7.95	53.01	64.91	0	2.38	1.98
	<i>Total</i>		<i>16.11</i>	<i>110.3</i>	<i>130.57</i>	<i>0.01</i>	<i>9.96</i>	<i>5.1</i>
2008 (3)	Phase 1, Stage 3	Demolition (Existing AD)	7.98	53.13	65.18	0	2.26	1.96
	Phase 1, Stage 2	Asphalt (1st AD)	4.07	23.72	34.27	0	0.73	0.67
	Phase 2	Demolition (Sites A, A-1, B)	8.09	55.71	65.64	0.01	5.56	2.68
	<i>Total</i>		<i>20.14</i>	<i>132.56</i>	<i>165.09</i>	<i>0.01</i>	<i>8.55</i>	<i>5.31</i>
2008 (4)	Phase 1, Stage 3	Demolition (Existing AD)	7.98	53.13	65.18	0	2.26	1.96
	Phase 1, Stage 4	Grading (2nd AD)	7.95	53.01	64.91	0	2.38	1.98
	Phase 2	Demolition (Sites A, A-1, B)	8.09	55.71	65.64	0.01	5.56	2.68
	<i>Total</i>		<i>24.02</i>	<i>161.85</i>	<i>195.73</i>	<i>0.01</i>	<i>10.2</i>	<i>6.62</i>
2008 (5)	Phase 1, Stage 4	Asphalt (2nd AD)	4.07	23.72	34.27	0	0.73	0.67
	Phase 2	Demolition (Sites A, A-1, B)	8.09	55.71	65.64	0.01	5.56	2.68
	<i>Total</i>		<i>12.16</i>	<i>79.43</i>	<i>99.91</i>	<i>0.01</i>	<i>6.29</i>	<i>3.35</i>
2008 (6)	Phase 2	Demolition (Sites A, A-1, B)	8.09	55.71	65.64	0.01	5.56	2.68
	Phase 3, Stage 1	Grading (Sites A, A-1, B)	19.25	205.28	134.46	0.21	31.87	11.23
	<i>Total</i>		<i>27.34</i>	<i>260.99</i>	<i>200.1</i>	<i>0.22</i>	<i>37.43</i>	<i>13.91</i>
2008 (7)	Phase 3, Stage 1	Grading (Sites A, A-1, B)	19.25	205.28	134.46	0.21	31.87	11.23
	<i>Total</i>		<i>19.25</i>	<i>205.28</i>	<i>134.46</i>	<i>0.21</i>	<i>31.87</i>	<i>11.23</i>
2009 (8a)	Phase 3, Stage 1	Construction (Sites A, A-1, B)	46	176.9	217.55	0	7.31	6.73
	<i>Total</i>		<i>46</i>	<i>176.9</i>	<i>217.55</i>	<i>0</i>	<i>7.31</i>	<i>6.73</i>
2010 (8b)	Phase 3, Stage 1	Construction (Sites A, A-1, B)	45.94	168.35	223.14	0	6.62	6.1
	<i>Total</i>		<i>45.94</i>	<i>168.35</i>	<i>223.14</i>	<i>0</i>	<i>6.62</i>	<i>6.1</i>
2010 (9)	Phase 3, Stage 2	Grading (3rd AD)	7.94	49	66.86	0	1.96	1.62
	Phase 3, Stage 1	Construction (Sites A, A-1, B)	45.94	168.35	223.14	0	6.62	6.1
	<i>Total</i>		<i>53.88</i>	<i>217.35</i>	<i>290</i>	<i>0</i>	<i>8.58</i>	<i>7.72</i>
2010 (10)	Phase 3, Stage 2	Asphalt (3rd AD)	4.04	23.25	34.23	0	0.64	0.59
	Phase 3, Stage 1	Construction (Sites A, A-1, B)	45.94	168.35	223.14	0	6.62	6.1
	<i>Total</i>		<i>49.98</i>	<i>191.6</i>	<i>257.37</i>	<i>0</i>	<i>7.26</i>	<i>6.69</i>
2010 (11)	Phase 3, Stage 2	Asphalt (3rd AD)	4.04	23.25	34.23	0	0.64	0.59
	Phase 3, Stage 1	Asphalt (Sites A, A-1, B)	4.17	23.57	34.3	0	0.65	0.6
	Phase 4	Demolition (Site C)	8	49.57	67.41	0	2.88	1.82
	<i>Total</i>		<i>16.21</i>	<i>96.39</i>	<i>135.94</i>	<i>0</i>	<i>4.17</i>	<i>3.01</i>
2010 (12)	Phase 4	Demolition (Site C)	8	49.57	67.41	0	2.88	1.82
	<i>Total</i>		<i>8</i>	<i>49.57</i>	<i>67.41</i>	<i>0</i>	<i>2.88</i>	<i>1.82</i>
2010 (13)	Phase 4	Demolition (Site C)	8	49.57	67.41	0	2.88	1.82
	Phase 5, Stage 1	Grading (Site C)	15.12	109.14	120.68	0.08	10.31	4.57
	<i>Total</i>		<i>23.12</i>	<i>158.71</i>	<i>188.09</i>	<i>0.08</i>	<i>13.19</i>	<i>6.39</i>
2010 (14)	Phase 5, Stage 1	Grading (Site C)	15.12	109.14	120.68	0.08	10.31	4.57
	<i>Total</i>		<i>15.12</i>	<i>109.14</i>	<i>120.68</i>	<i>0.08</i>	<i>10.31</i>	<i>4.57</i>

Table 6. Construction Emissions from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Construction Year (Scenario)	Phase/Stage	Description	Emissions (lbs/day)					
			VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2010 (15a)	Phase 5, Stage 1	Construction (Site C)	6.1	38.67	50.68	0	1.51	1.39
	<i>Total</i>		<i>6.1</i>	<i>38.67</i>	<i>50.68</i>	<i>0</i>	<i>1.51</i>	<i>1.39</i>
2011 (15b)	Phase 5, Stage 1	Construction (Site C)	8.13	38.72	51.66	0	1.53	1.41
	<i>Total</i>		<i>8.13</i>	<i>38.72</i>	<i>51.66</i>	<i>0</i>	<i>1.53</i>	<i>1.41</i>
2011 (16)	Phase 5, Stage 2	Demolition (3rd AD)	7.95	49.21	66.9	0	2.03	1.63
	Phase 5, Stage 1	Asphalt (Site C)	4.03	23.24	34.23	0	0.64	0.59
	<i>Total</i>		<i>11.98</i>	<i>72.45</i>	<i>101.13</i>	<i>0</i>	<i>2.67</i>	<i>2.22</i>
2012 (17)	Phase 5, Stage 2	Grading (Final AD)	7.93	48.93	66.24	0	3.1	1.86
	<i>Total</i>		<i>7.93</i>	<i>48.93</i>	<i>66.24</i>	<i>0</i>	<i>3.1</i>	<i>1.86</i>
2012 (18)	Phase 5, Stage 3	Grading (Residential AD)	7.94	49	66.86	0	1.99	1.62
	Phase 5, Stage 2	Asphalt (Final AD)	4.1	23.4	34.26	0	0.64	0.59
	<i>Total</i>		<i>12.04</i>	<i>72.4</i>	<i>101.12</i>	<i>0</i>	<i>2.63</i>	<i>2.21</i>
2012 (19)	Phase 5, Stage 3	Asphalt (Residential AD)	4.04	23.26	34.23	0	0.64	0.59
	<i>Total</i>		<i>4.04</i>	<i>23.26</i>	<i>34.23</i>	<i>0</i>	<i>0.64</i>	<i>0.59</i>
Maximum Daily Emissions			<i>53.88</i>	<i>260.99</i>	<i>290</i>	<i>0.22</i>	<i>37.43</i>	<i>13.91</i>

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Project. Appendix 4-2b (Recirculated). URBEMIS Summary Table

Abbreviations:

CO - carbon monoxide
 NO_x - oxides of nitrogen
 SO_x - sulfur oxide

VOC - volatile organic compound
 PM_{2.5} - particulate matter, 2.5 micrometers and smaller
 PM₁₀ - particulate matter, 10 micrometers and smaller

Table 7a. Construction Emissions from the Modified Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Phase/Stage	Construction Type	Assumptions	Duration (months)	Emissions (lbs/day)					
				VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Phase 1, Stage 1	Demolition	--	6	--	--	--	--	--	--
Phase 1, Stage 2	Grading	--	4	--	--	--	--	--	--
Phase 1, Stage 3	Building construction	--	20	--	--	--	--	--	--
Phase 1, Stage 4	Arch coatings/asphalt	--	8.5	--	--	--	--	--	--
Phase 2, Stage 1	Demolition	BASIS: Original Phase 1, Stage 3	2	7.98	53.13	65.18	0	2.26	1.96
Phase 2, Stage 2	Demolition	BASIS: Original Phase 1, Stage 1 and Phase 2	6	16.25	113	131.3	0.02	13.14	5.8
Phase 2, Stage 3	Grading	BASIS: Original Phase 3, Stage 1	4	19.25	205.28	134.46	0.21	31.87	11.23
Phase 2, Stage 4	Building construction	BASIS: Original Phase 3, Stage 1 --> This activity represents the construction of the conference center, hotel lobby, and associated building, which was completed as part of original Phase 3, Stage 1. Because original Phase 3, Stage 1 also consisted of the construction of Residence A, the emissions associated with Residence A (which is assumed equal to those associated with Residence B) were subtracted.	20	39.9	138.23	172.46	0	5.8	5.34
Phase 2, Stage 5	Arch coatings/asphalt	BASIS: Original Phase 3, Stage 1 --> This activity represents the construction of the conference center, hotel lobby, and associated building, which was completed as part of original Phase 3, Stage 1. Because original Phase 3, Stage 1 also consisted of the construction of Residence A, the emissions associated with Residence A (which is assumed equal to those associated with Residence B) were subtracted.	8.5	0.14	0.33	0.07	0	0.01	0.01
Phase 2, Stage 6	Grading	BASIS: Original Phase 5, Stage 2	1	7.93	48.93	66.24	0	3.1	1.86
Phase 2, Stage 7	Asphalt	BASIS: Original Phase 5, Stage 2	1	4.1	23.4	34.26	0	0.64	0.59
Phase 3, Stage 1	Grading	BASIS: Original Phase 5, Stage 3	1	7.94	49	66.85	0	1.99	1.62
	Building construction	BASIS: Original Phase 5, Stage 3	2	4.04	23.26	34.23	0	0.64	0.59

Table 7a. Construction Emissions from the Modified Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Phase/Stage	Construction Type	Assumptions	Duration (months)	Emissions (lbs/day)					
				VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Phase 4, Stage 1	Demolition	BASIS: Original Phase 4	6	8	49.57	67.41	0	2.88	1.82
Phase 4, Stage 2	Grading	BASIS: Original Phase 5, Stage 1	4	15.12	109.14	120.68	0.08	10.31	4.57
Phase 4, Stage 3	Building construction	BASIS: Original Phase 5, Stage 1 --> This is the construction of the residential tower, which replaces Residences A and B. It was assumed that total maximum activity is the same as for both Residences A and B, or 2x Phase 5, Stage 1	30	16.26	77.44	103.32	0	3.06	2.82
				8.13	38.72	51.66	0	1.53	1.41
				8.13	38.72	51.66	0	1.53	1.41
Phase 4, Stage 4	Arch coatings/asphalt	BASIS: Original Phase 5, Stage 1 --> This is the architectural coatings and paving associated with the residential tower, which replaces Residences A and B. It was assumed that total maximum activity is the same as for both Residences A and B, or 2x Phase 5, Stage 1	6	8.06	46.48	68.46	0	1.28	1.18
				4.03	23.24	34.23	0	0.64	0.59
				4.03	23.24	34.23	0	0.64	0.59
TOTAL				11.98	72.26	101.09	0	2.63	2.21
Concurrent phases									
	Phase 2, Stage 4 + Phase 4, Stage 1			47.90	187.8	239.87	0	8.68	7.16
	Phase 2, Stages 5, 6, and 7			12.17	72.66	100.57	0	3.75	2.46
	Phase 2, Stage 4 + Phase 4, Stage 2			55.02	247.37	293.14	0.08	16.11	9.91
	Phase 2, Stage 4 + Phase 4, Stage 3			56.16	215.67	275.78	0	8.86	8.16
Maximum Daily Emissions				56.16	247.37	293.14	0.21	31.87	11.23

Notes:
 The maximum daily emissions occur when the construction of the conference center and lobby in Phase 2, Stage 4 overlaps with the construction of the residential tower in Phase 3.

Abbreviations:
 CO - carbon monoxide
 NO_x - oxides of nitrogen
 SO_x - sulfur oxide
 VOC - volatile organic compound
 PM_{2.5} - particulate matter, 2.5 micrometers and smaller
 PM₁₀ - particulate matter, 10 micrometers and smaller

Table 7b. Construction Emissions from the Modified Project - VOC Emissions from Architectural Coatings
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

The VOC emissions in the FEIR analysis were based on a VOC emission factor corresponding to an expected VOC content in the architectural coatings (i.e., paint) used during construction of the project. The VOC content in coatings has decreased over time and most commercially available paints have lower VOC contents. In addition, the project has committed to the use of low VOC coatings as a project design feature (PDF). As a result, the VOC emissions from coating activities are being adjusted to more accurately reflect

Maximum VOC Emissions	
Total VOC (w/o PDF) =	56.2 lb/day
Phase 2, Stage 4 =	39.9 lb/day
Phase 4, Stage 3 =	16.3 lb/day
Total VOC (w PDF) =	53.0 lb/day
Phase 2, Stage 4 =	37.3 lb/day
Phase 4, Stage 3 =	15.7 lb/day

Emissions Calculations with Project Design Features (PDF)		
Phase 2, Stage 4		
Total VOC (w/o PDF)	39.9	lb/day
Architectural coatings activities (off gas, w/o PDF) ¹	17.3	lb/day
Building activities ²	22.6	lb/day
Architectural coatings (off gas, w/PDF) ³	14.7	lb/day
Total VOC (w/PDF)	37.3	lb/day
Phase 4, Stage 3		
Total VOC (w/o PDF)	16.3	lb/day
Architectural coatings activities (off gas, w/o PDF) ⁴	3.9	lb/day
Building activities ²	12.4	lb/day
Architectural coatings (off gas, w/PDF) ³	3.3	lb/day
Total VOC (w/PDF)	15.7	lb/day

Table 7b. Construction Emissions from the Modified Project - VOC Emissions from Architectural Coatings
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Architectural Coatings Emission Factors	
FEIR	
Residential ⁵	0.003 lb/ft ²
Nonresidential ⁵	0.01 lb/ft ²
Modified Project	
VOC content ⁶	50 g/L
Residential and nonresidential ⁷	0.00232 lb/ft ²
Residential ratio ⁸	0.85 unitless
Nonresidential ratio ⁸	0.20 unitless
Content ratio ⁹	0.85 unitless

Notes:

1. This phase is based on FEIR Phase 3, Stage 1; emissions obtained from FEIR, Appendix 4.2a - URBEMIS (Recirculated EIR), Phase 3, Stage 1 Summary Table (PDF pg 76). Phase 3, Stage 1 emissions also consisted of the construction of Residence A, and, thus, the emissions associated with Residence A (which is assumed equal to those associated with Residence B) were subtracted out. The emissions associated with Residence A are obtained from FEIR, Appendix 4.2a - URBEMIS (Recirculated EIR), Phase 5, Stage 1 (PDF pg 115). See Table 7a for additional details.
2. The remaining VOC emissions from the phase are due to building activities.
3. Reduced emissions account for the low VOC coatings the project commits to using. Emissions are calculated as:

$$\text{Reduced Emissions} = \text{Original Emissions} * \text{Content Ratio}$$
4. This phase is based on FEIR Phase 5, Stage 1; Emissions obtained from FEIR, Appendix 4.2a - URBEMIS (Recirculated EIR), Phase 5, Stage 1 Summary Table (PDF pg 115). It is assumed that total maximum activity is the same for Residences A and B, or 2x Phase 5, Stage 1. See Table 7a for additional details.
5. Emission factors are obtained from FEIR, Appendix 4.2a - URBEMIS (Recirculated EIR), Phase 3, Stage 1 page 18 (page 75 of PDF).
6. The VOC content is assumed to be the lowest VOC content indicated in SCAQMD Rule 1113. It is noted that coatings with lower VOC contents are commercially available and this analysis may be conservative.
7. The emission factor is calculated using the equation in CalEEMod as:

$$\text{EF [lb/ft}^2\text{]} = \text{VOC}_{\text{content}} / 454[\text{g/lb}] * 3.785 [\text{L/gal}] / 180 [\text{ft}^2\text{}]$$
8. The residential ratio represents the ratio of the FEIR emission factor and the emission factor with the PDFs as:

$$\text{Ratio} = \text{PDF EF [lb/ft}^2\text{]} / \text{FEIR EF [lb/ft}^2\text{]}$$
9. To be conservative, the ratio that would result in the **greatest** emissions after incorporation of the PDF was selected, i.e., the greatest ratio.

Abbreviations:

FEIR - Final Environmental Impact Report	lb - pound
ft ² - square feet	PDF - Project Design Feature
gal - gallon	VOC - volatile organic compound
g - gram	

Table 8. Summary of Construction Emissions Impacts from the Approved and Modified Projects

Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
FEIR Max Daily Emissions	54	261	290	0.2	37	14
SCAQMD Thresholds	75	100	550	150	150	55
FEIR Significance Determination	NO	YES	NO	NO	NO	NO
Modified Max Daily Emissions	53	247	293	0.2	32	11
Increase in Daily Emissions	-1	-14	3	0	-5	-3
Substantial Change	NO	NO	NO	NO	NO	NO

Notes:

Emissions have been rounded to the nearest whole number (except for SO_x) for comparison to the significance thresholds.

Abbreviations:

CO - carbon monoxide
 NO_x - oxides of nitrogen
 SO_x - sulfur oxide

VOC - volatile organic compound
 PM_{2.5} - particulate matter, 2.5 micrometers and smaller
 PM₁₀ - particulate matter, 10 micrometers and smaller

Table 9. Impacts from Construction of the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Pollutant	Modeling Results		LST Criteria		Exceeds Threshold?
	µg/m ³	ppm	µg/m ³	ppm	
Residential Receptors					
PM ₁₀ - 24 hour	56.91	NA	10.4	NA	YES
PM _{2.5} - 24 hour	29.19	NA	10.4	NA	YES
NO ₂ - 1 hour	176	0.09	244	0.13	NO
CO - 1 hour	3,051	2.67	17,165	15	NO
- 8 hour	2,204	1.93	7,209	6.3	NO
Sensitive Receptors					
PM ₁₀ - 24 hour	27.36	NA	10.4	NA	YES
PM _{2.5} - 24 hour	16.97	NA	10.4	NA	YES
NO ₂ - 1 hour	233	0.12	244	0.13	NO
CO - 1 hour	3,348	2.93	17,165	15	NO
- 8 hour	1,163	1.02	7,209	6.3	NO

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Project. Appendix 4-2g (Recirculated). LST Analysis. Table 5 - Modeling Results. Maximum Impacts at Residential Receptors.

Abbreviations:

CO - carbon monoxide
 NO_x - oxides of nitrogen
 ppm - parts per million
 m³ - cubic meter

PM_{2.5} - particulate matter, 2.5 micrometers and smaller
 PM₁₀ - particulate matter, 10 micrometers and smaller
 µg - microgram
 SO_x - sulfur oxide

Table 10. Summary of Operational Emissions Impacts from the Approved and Modified Projects

Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

	Emissions (lbs/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
FEIR Max Daily Emissions	-1.44	-5.05	-68.06	0.08	5.5	1.5
SCAQMD Thresholds	55	55	550	150	150	55
FEIR Significance Determination	NO	NO	NO	NO	NO	NO
Modified Max Daily Emissions	-1.44	-5.05	-68.06	0.08	5.5	1.5
Increase in Daily Emissions	0	0	0	0	0	0
Substantial Change	NO	NO	NO	NO	NO	NO

Notes:

Emissions have been rounded to the nearest whole number (except for Sox) for comparison to the significance thresholds.

Abbreviations:

CO - carbon monoxide

lbs - pounds

NO_x - oxides of nitrogen

ppm - parts per million

PM_{2.5} - particulate matter, 2.5 micrometers and smaller

PM₁₀ - particulate matter, 10 micrometers and smaller

SO_x - sulfur oxide

VOC - volatile organic compound

Table 11. Summary of Cultural Resources Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Historical Resources		
<p>The project would demolish a portion of The Beverly Hilton property, including the Wilshire Edge building, Wilshire Boulevard pedestrian entrance, pool, and former Trader Vic's restaurant, all determined to be potentially eligible for listing on the National Register and California Register. Demolition is considered a substantial adverse change of the significance of an historical resource under Section 15064.5(b)(1) of the CEQA Guidelines, which would be a significant impact.</p>	<p>CR-1: Components of The Beverly Hilton to be demolished shall be photographed with large-format black and white photography, and a written report which follows to Historic American Buildings Survey (HABS) / Historic American Engineering Record (HAER) standards at a minimum Level 3 Recordation. This documentation shall be donated to a suitable repository, such as the City of Beverly Hills Public Library.</p>	<p>Significant and Unavoidable</p>
<p>The adjacent Robinsons-May building, which is planned for demolition as part of the 9900 Wilshire project, is considered a historic resource for purposes of CEQA. Demolition of portions of The Beverly Hilton, considered together with demolition of the Robinsons-May building, would contribute to cumulatively significant impacts on cultural resources.</p>	<p>See CR-1. No additional feasible mitigation measure is available.</p>	<p>Significant and Unavoidable</p>
<p>The proposed Waldorf Astoria Hotel and proposed New Beverly Hilton Hotel Rooms building on Wilshire Boulevard would disrupt the Beverly Hilton's historic fabric and integrity, creating a significant material impairment of the Beverly Hilton's setting and a change in the character of the Beverly Hilton's setting through the introduction of visual and atmospheric elements that are not in conformance with the Secretary of the Interior's Standards Nos. 1 and 2. This is a potentially significant impact.</p>	<p>See CR-1.</p>	<p>Significant and Unavoidable</p>
<p>Sixteen potentially historic street lights are located adjacent to the Hilton site; nine are located along Wilshire Boulevard and seven are located along Santa Monica Boulevard. These street lights are potentially eligible for local listing or designation as historic resources. This is a potentially significant impact.</p>	<p>CR-2: Potentially historic street lights adjacent to the project site shall be preserved and reinstalled along this section of Wilshire Boulevard and Santa Monica Boulevard, as appropriate, in consultation with the project proponents, the City of Beverly Hills, and an architectural historian qualified under the Secretary of the Interior's Standards.</p>	<p>Less Than Significant</p>
<p>Three potentially historic sign posts are located between Wilshire and Santa Monica Boulevards along Merv Griffin Way. These sign posts have not been formally surveyed or evaluated and are currently considered potential historical resources. This is a potentially significant impact.</p>	<p>CR-3: Potentially historic sign posts adjacent to the project site on Merv Griffin Way shall be preserved and reinstalled in approximately the same locations, as appropriate, in consultation with the project proponents, the City of Beverly Hills, and an architectural historian qualified under the Secretary of the Interior's Standards.</p>	<p>Less Than Significant</p>

Table 11. Summary of Cultural Resources Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Archaeological Resources		
<p>No archaeological resources or human remains are known to have been discovered on the project site during previous disturbances. However, excavation activities have the potential to result in a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5, as well as the potential to disturb human remains. This is a potentially significant impact.</p>	<p>CR-4: If buried cultural resources are encountered during construction, all work shall be halted in the vicinity of the archaeological discovery until a qualified archaeologist can assess the nature and significance of the archaeological discovery, per CEQA Section 15064.5 (f). Recovery of significant archaeological deposits, if necessary, shall include but not be limited to, manual or mechanical excavations, monitoring, soils testing, photography, mapping, or drawing to adequately recover the scientifically consequential information from and about the archaeological resource. Further treatment may be required, including site recordation, excavation, site evaluation, and data recovery. Any artifacts uncovered shall be recorded and removed for storage at a location to be determined by the archaeologist.</p> <p>CR-5: If human remains are discovered during construction, the coroner and designated Native American representatives shall be notified in accordance with Public Resources Code Section 5097.98, Health and Safety Code Section 7050.5, and Section 15064.5 (d) of the State CEQA Guidelines. State Health and Safety Code Section 7050.5 states that if human remains are unearthed during construction, no further disturbance shall occur until the county coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code Section 5097.98. In accordance with applicable regulations, construction activities shall halt in the event of discovery of human remains, and consultation and treatment shall occur as prescribed by law. If human remains discovered are of Native American origin, it shall be necessary to comply with state laws relating to the disposition of Native American burials that fall within the jurisdiction of the California Native American Heritage Commission (Public Resources Code Section 5097). According to California Health and Safety Code, six or more human burials at one location constitute a cemetery (Section 8100), and disturbance of Native American cemeteries is a felony (Section 7052). If the remains are determined to be Native American, the coroner shall contact the California Native American Heritage Commission to determine the most likely living descendant(s). The most likely living descendant shall determine the most appropriate means of treating the human remains and any associated grave artifacts and oversee disposition of the human remains and associated artifacts by the project archaeologists.</p>	<p>Less Than Significant</p>

Table 11. Summary of Cultural Resources Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Paleontological Resources		
No paleontological resources are known to have been discovered on the project site during previous disturbances. However, excavation activities have the potential to directly or indirectly destroy a unique paleontological resource or a unique geologic resource. This is a potentially significant impact.	CR-6: In the event a previously unknown fossil is uncovered during project construction, all work shall cease until a certified paleontologist can investigate the finds and make appropriate recommendations. Any artifacts uncovered shall be recorded and removed for storage at a location to be determined by the monitor.	Less Than Significant
Cumulative Impacts		
The proposed project would be constructed to the east of 9900 Wilshire Project, an historical resource that was found to meet California Register Criteria 1 and 3. Because The Beverly Hilton Hotel and Robinsons-May building are considered historic resources for purposes of CEQA, demolition of portions of The Beverly Hilton, considered together with demolition of the Robinsons-May building, constitutes a considerable, and therefore significant, impact on cultural resources.	See Mitigation Measures CR-1 through CR-3	Significant and Unavoidable

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan. Table 2.0-1: Summary Table of Project Impacts and Mitigation Measures. This table incorporates information from the Draft EIR, as well as any changes noted in the Final EIR.

Table 12. Project Features and Mitigation Measures to Achieve Climate Action Team Strategies
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Climate Action Team Strategy	Implementing Agency	Project Feature/Mitigation
Vehicle Climate Change Standards	CARB	The project would be consistent with this strategy to the extent that new passenger vehicle and light trucks are purchased by the project's users starting in the 2009 model year.
HFC Reduction Strategies	CARB	Project air conditioning systems would comply with the latest standards for new systems. Use of consumer products using HFCs would comply with CARB regulations, when adopted.
Building Energy Efficiency Standards in Place	Energy Commission	The project will meet or exceed California energy standards or energy efficient lighting requirements.
Appliance Energy Efficiency Standards in Place	Energy Commission	
Water Use Efficiency	Department of Water Resources	The project will meet or exceed California water use and conservation standards.

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan. Table 4.2-17: Project Features and Mitigation Measures to Achieve Climate Action Team Strategies.

Table 13. Summary of Land Use and Planning Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>With the adoption of the Beverly Hilton Revitalization Specific Plan, the project site's zoning and land use designations would change to "Specific Plan." The proposed project would be generally consistent with most of the Elements of the City of Beverly Hills General Plan and with the City of Beverly Hills Municipal Code.</p> <p>However, the proposed project would introduce residential land uses where none currently exist, substantially increase development density, and substantially increase building heights on the project site. For these reasons, the project would not be consistent with General Plan Land Use Element Objective 3, Areas of Transitional Conflict, and 4, Scale of the City, or with Land Use Element development criteria for Commercial Areas recommending compatibility between commercial and residential areas. This is a potentially significant impact.</p>	<p>No feasible mitigation measures are available.</p>	<p>Significant and Unavoidable</p>
<p>Proposed demolition of a portion of The Beverly Hilton, which is potentially eligible for listing on the National Register and California Register and is therefore considered a historic resource for purposes of CEQA, would conflict with goals related to landmark preservation in the General Plan Land Use Conservation Element. This is a significant impact.</p>	<p>See Mitigation Measure CR-1. No additional feasible mitigation measure is available.</p>	<p>Significant and Unavoidable</p>
<p>The Beverly Hilton Revitalization project, considered together with the adjacent 9900 Wilshire project, would result in cumulatively significant land use impacts as the result of inconsistency with General Plan Land Use Element Objectives 3 and 4 and development criteria concerning Commercial Areas.</p>	<p>No feasible mitigation is available.</p>	<p>Significant and Unavoidable</p>
<p>The Robinsons-May building, which was determined to be potentially eligible for the California Register, is proposed for demolition as part of the 9900 Wilshire project. Accordingly, the proposed project, considered together with the 9900 Wilshire project, would result in cumulatively significant land use impacts as the result of inconsistency with General Plan Conservation Element goals related to landmark preservation.</p>	<p>See Mitigation Measure CR-1. No additional feasible mitigation measure is available.</p>	<p>Significant and Unavoidable</p>

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan. Table 2.0-1: Summary Table of Project Impacts and Mitigation Measures.

This table incorporates information from the Draft EIR, as well as any changes noted in the Final EIR.

Table 14. Summary of Noise Impacts from EIR
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Construction		
Construction Noise Increase Over Ambient Levels		
Construction noise increase for activities between 6 PM and 8 AM	MM-NOISE-1	Significant and Unavoidable
Off-site traffic noise increase due to construction vehicles	Not required	Less than significant
Noise from interior construction activities affecting off-site receivers	Not required	Less than significant
Cumulative noise with construction of 9900 Wilshire	MM-NOISE-4	Significant and Unavoidable
Construction-Related Vibration		
Estimated vibration levels affecting El Rodeo Elementary School	Not required	Less than significant
Estimated vibration levels affecting residences north of the project site	None feasible	Significant and Unavoidable
Estimated vibration levels affecting on-site hotel uses	None feasible	Significant and Unavoidable
Operation		
Off-site Noise Impacts due to Increases		
Traffic noise level increases	Not required	Less than significant
Increases in ambient levels due to mechanical equipment	Not required	Less than significant
Increases in ambient levels due to Parking Structures	Not required	Less than significant
Suitability of Exterior Sound Levels		
Traffic sound levels affecting outdoor living spaces associated with Residences A and B, new Beverly Hilton rooms, and the Waldorf Astoria Hotel adjacent to Wilshire and Santa Monica Boulevards and Merv Griffin Way	MM-NOISE-2	Less than significant
Noise from parking garage affecting on-site uses	Not required	Less than significant
Suitability of Interior Sound Levels		
Interior sound levels for residential units adjacent to Merv Griffin Way	Not required	Less than significant
Interior sound levels for residential units, floors 1-6, adjacent to Wilshire and Santa Monica Boulevards	MM-NOISE-3	Less than significant

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan.

Table 15. Summary of Noise Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Exterior construction activities performed Monday through Friday between the hours of 8:00 AM and 6:00 PM would result in less than significant noise impacts.	None required.	Less Than Significant
Exterior construction activities performed outside of the hours specified in the City's noise ordinance, including before 8:00 AM, after 6:00 PM, and during weekends and holidays, would result in significant impacts at off-site sensitive receptors.	<p>NOISE-1: Prior to issuance of grading permits, the applicant shall submit a Construction Management Plan satisfactory to the Director of Community Development and the Building Official. The Building Official shall enforce noise attenuating construction requirements. The Construction Management Plan shall include, but not be limited to, the following noise attenuation measures:</p> <ul style="list-style-type: none"> - Excavation, grading, and other construction activities related to the proposed project shall comply with Section 5-1-206, Restrictions on Construction Activity, of the City Municipal Code. Any deviations from these standards shall require the written approval of the Community Development Director. - During the initial stage of construction, including site demolition and site preparation/excavation, and when construction activities are within 200 feet of the northern boundary of the site, an 8-foot temporary sound barrier (e.g., wood fence), with at least 0.5-in thickness, shall be erected at the project site, to the extent feasible. Sound blankets will also be used. All stationary construction equipment (e.g., air compressor, generators, etc.) shall be operated as far away from the single-family residences and elementary school located north of the project site as possible. If this is not possible, the equipment shall be shielded with temporary sound barriers, sound aprons, or sound skins to the satisfaction of the Director of Community Development. - Haul routes for construction materials shall be restricted to truck routes approved by the City. Hauling trucks shall be directed to use commercial streets and highways, and to the extent feasible, shall minimize the use of residential streets. The haul routes and staging areas for the project shall be established to minimize the impact of construction traffic on nearby residential neighborhoods and schools. Generally, haul routes to the 405 Freeway shall utilize Santa Monica Boulevard to minimize impacts to City streets. 	Significant and Unavoidable

Table 15. Summary of Noise Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
NOISE-1 (continued)	<ul style="list-style-type: none"> - All construction vehicles, such as bulldozers and haul trucks, shall be prohibited from idling in excess of 10 minutes, both on site and off site. Construction vehicles will not be staged on streets located in the City of Beverly Hills. - The General Contractor and its subcontractors shall inspect construction equipment to ensure that such equipment is in proper operating condition and fitted with standard factory silencing features. Construction equipment shall use available noise control devices, such as equipment mufflers, enclosures, and barriers. - Prior to the start of every school year, the applicant shall obtain a schedule of testing periods at El Rodeo School. The applicant shall submit a construction schedule for review and approval by the Community Development Director and the Environmental Monitor that ensures that no construction activity generating the highest noise levels (e.g. demolition and grading) is undertaken during any designated testing periods at the school. Such testing periods typically occur for one week per semester; however, the exact dates and times will be determined by the School District. 	
Daily transportation of construction workers, the hauling of materials both on- and off-site, and the transportation of equipment to the project site are not expected to result in a 3 decibels as measured on an A-weighted scale (dB(A)) noise increase. Impacts would be less than significant.	None required.	Less Than Significant
Project implementation would not result in an increase in Community Noise Equivalent Level (CNEL) of greater than 3 dB(A) on any of the study area roadway segments. The project would not exceed the significance criteria for off-site noise impacts and roadway noise impacts would be less than significant.	None required.	Less Than Significant
Development activities on the project site would comply with Beverly Hills Municipal Code Section 5-1-202, which requires that noise generated by mechanical equipment not exceed 5.0 dB(A) above ambient noise levels at adjacent property lines. Use of standard design features such as shielding, enclosures and parapets, proper selection and sizing of equipment, as well as locating rooftop equipment a suitable distance from sensitive receptors, would ensure compliance with City Code, and no significant impacts are anticipated due to mechanical equipment.	None required.	Less Than Significant

Table 15. Summary of Noise Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Use of the proposed subterranean parking structures would not result in audible noise at on- or off-site locations, since parking structure noise would be masked by traffic noise on nearby roadways. Off- and on-site noise impacts associated with the parking structures would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Traffic noise on Santa Monica Boulevard, Wilshire Boulevard, and Merv Griffin Way in the future "with project" condition would approach or exceed the multi-family residential exterior noise standard of 65 dB(A). This is a significant impact.</p>	<p>NOISE-2: The applicant shall implement sound attenuation features to reduce noise levels at all private outdoor livable spaces (i.e., balconies) on building floors 1 through 6 fronting Wilshire and Santa Monica Boulevards and Merv Griffin Way. Such features may include berms made of sloping mounds of earth, walls and fences constructed of a variety of materials, thick plantings of trees and shrubs, or combinations of these materials, or the use of solid material for balcony construction such as double-paned or laminated glass, Plexiglas, or wood. Acoustical analysis shall be performed prior to the issuance of an occupancy permit to demonstrate that noise levels at the exterior livable spaces do not exceed state land use standards for residences. This requirement shall be incorporated into the plans to be submitted by the applicant to the City of Beverly Hills for review and approval prior to the issuance of building permits.</p>	<p>Less Than Significant</p>
<p>Traffic noise along Santa Monica and Wilshire Boulevards would exceed the interior noise threshold of 45 dB(A) CNEL for residential spaces on-site even with compliance with Title 24 requirements. This is a significant impact.</p>	<p>NOISE-3: The applicant shall incorporate building materials and techniques that reduce sound transmission through walls, windows, doors, ceilings, and floors of on-site residences in order to achieve interior noise levels that are below the state land use guidelines standards for interior noise. Such building materials and techniques may include double-paned windows, staggered studs, or sound-absorbing blankets incorporated into building wall design, or outdoor noise barriers erected between noise sources and noise-sensitive areas, such as berms made of sloping mounds of earth, walls and fences constructed of a variety of materials, thick plantings of trees and shrubs, or combinations of these materials. Acoustical analysis shall be performed prior to the issuance of an occupancy permit to demonstrate that noise levels in the interior livable spaces do not exceed state standards for residences. This requirement shall be incorporated into the plans to be submitted by the applicant to the City of Beverly Hills for review and approval prior to the issuance of building permits.</p>	<p>Less Than Significant</p>

Table 15. Summary of Noise Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Construction activity would generate vibration levels of up to 75 velocity decibels (VdB) at 100 feet from the source. This exceeds 72 VdB, the FRA vibration threshold for hotels. As such, construction activity would result in significant vibration impacts on on-site receptors (i.e., the hotel).	See Mitigation Measure NOISE-1. No additional feasible mitigation is available.	Significant and Unavoidable
In the event that exterior construction activities are performed on the project site and the 9900 Wilshire project site outside of the hours specified in the City's noise ordinance, the proposed project would result in a cumulatively considerable and therefore significant contribution to cumulatively significant noise impacts.	NOISE-4: The Beverly Hilton Revitalization Plan project applicant shall coordinate with the 9900 Wilshire project applicant regarding the following: <ul style="list-style-type: none"> - All temporary roadway closures shall be coordinated to limit overlap of roadway closures; - All major deliveries for both projects shall be coordinated to limit the occurrence of simultaneous deliveries. The applicants shall ensure that deliveries of items such as concrete and other high-volume items shall not be done simultaneously; - The applicants shall coordinate regarding the loading and unloading of delivery vehicles. Any off-site staging areas for delivery vehicles shall be consolidated and shared; and - Applicants or their representatives shall meet on a regular basis during construction to address any outstanding issues related to construction traffic, deliveries, and worker parking. 	Significant and Unavoidable
The proposed project, considered together with the adjacent 9900 Wilshire project, would result in cumulatively considerable and therefore significant contributions to cumulatively significant vibration impacts on sensitive receptors north of Wilshire Boulevard.	See Mitigation Measure NOISE-3. No additional feasible mitigation is available.	Significant and Unavoidable

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan. Table 2.0-1: Summary Table of Project Impacts and Mitigation Measures.

This table incorporates information from the Draft EIR, as well as any changes noted in the Final EIR.

Table 16. Construction Noise Levels
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Activity/Combination of Activities	Required Equipment	Noise Levels at 100 feet (dBA, CNEL)
<i>Approved Project – Worst-Case</i>		
Demolition: Existing access drive, executive conference center, hotel office, hotel retail, lobby components, existing parking, 1st AD, et al. Grading: The Waldorf Astoria Hotel, Residences A Building, new executive conference center, hotel retail, hotel office, lobby components, parking, et al.	2 Trucks, 3 Dozers, Scraper, Drilled Piles, 3 Loaders	88
<i>Modified Project –Worst-Case</i>		
Construction: new conference center and hotel lobby Grading: subterranean parking	Saws, 2 Other Equipment, Forklift, Grader, Paver, Roller, Excavator, Truck, Dozer, Scraper, Loader, Drilled Piles	88 ¹

Notes:

¹ This level was calculated by logarithmically adding the estimated sound levels identified for Grading: Site C (87 dBA) and for Construction: Site C (83 dBA) in Table 4.8-5 of the Draft and Recirculated Draft EIR.

Table 17. Estimated Sound Levels of Beverly Hilton Pool Activities (dBA, L_{eq})

Beverly Hills Garden and Open Space Initiative
Beverly Hills, California

Sensitive Receiver	Distance to Pool Terrace (ft)	Calculated Sound Level	Lowest Existing Sound Level	
			Day	Night
Residences North of Wilshire Blvd	200	38	63 ¹	55 ¹
El Rodeo Elementary School	363	32	63 ¹	55 ¹
9900 Wilshire	249	36	62 ²	54 ²

¹ The lowest hourly sound levels during daytime hours (7 AM to 10 PM) and nighttime hours (10 PM to 7 AM) were estimated based on the measured sound levels taken at Monitoring Site 1 and identified in Appendix 4.8 of the Final EIR. Please note that the measured levels shown in Appendix 4.8 had been adjusted by adding 5 dBA to the levels between 7 PM and 10 PM and adding 10 dBA to the levels between 10 PM and 7 AM, and these adjustments were removed for this assessment to identify the actual measured levels. The measured levels, taken 80 feet from the centerline of Wilshire Boulevard, were also adjusted to represent the additional distance to the nearest residences to Wilshire Boulevard, approximately 115 feet (i.e., calculated based on a reduction of 3 dBA for every doubling of distance to the roadway line source).

² The lowest hourly sound levels during daytime hours (7 AM to 10 PM) and nighttime hours (10 PM to 7 AM) were estimated based on the measured sound levels taken at Monitoring Site 4 as identified in Appendix 4.8 of the Final EIR. Please note that the measured levels shown in Appendix 4.8 had been adjusted by adding 5 dBA to the levels between 7 PM and 10 PM and adding 10 dBA to the levels between 10 PM and 7 AM, and these adjustments were removed for this assessment to identify the actual measured levels.

Table 18. Estimated Sound Levels of Outdoor Events (dBA, L₂₅/L_{eq})¹

Beverly Hills Garden and Open Space Initiative
Beverly Hills, California

Sensitive Receiver	Event (ft)^[2]	80-Person Event	200-Person Event	Sound Level (8 AM to 10 PM)
Residences North of Wilshire Blvd	200	46	56	58 ^[3]
El Rodeo Elementary School	200	46	56	58 ^[3]
9900 Wilshire	100	52	62	62 ^[4]

Notes:

¹ The L₂₅ is the sound level exceeded 25 percent of a specified time period (e.g., 15 minutes of an hour). For noise sources that continue for an entire hour, the hourly L₂₅ and L_{eq} are typically very similar (within 1 or 2 dBA), and both are considered comparable for this discussion.

² These distances assume that outdoor events could occur either on the pool terrace or in the expanded outdoor garden.

³ The lowest measured sound level between 8 AM and 10 PM was estimated based on the measured sound levels taken at Monitoring Site 1 and identified in Appendix 4.8 of the Final EIR. Please note that the measured levels shown in Appendix 4.8 had been adjusted by adding 5 dBA to the levels between 7 PM and 10 PM and adding 10 dBA to the levels between 10 PM and 7 AM, and these adjustments were removed for this assessment to identify the actual measured hourly levels. The measured levels, taken 80 feet from the centerline of Wilshire Boulevard, were also adjusted to represent the additional distance to the nearest residences to Wilshire Boulevard, approximately 115 feet (i.e., calculated based on a reduction of 3 dBA for every doubling of distance to the roadway line source).

⁴ The lowest measured sound level between 8 AM and 10 PM was estimated based on the measured sound levels taken at Monitoring Site 4 as identified in Appendix 4.8 of the Final EIR. Please note that the measured levels shown in Appendix 4.8 had been adjusted by adding 5 dBA to the levels between 7 PM and 10 PM and adding 10 dBA to the levels between 10 PM and 7 AM, and these adjustments were removed for this assessment to identify the actual measured hourly levels.

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Future "With Project" Operation Impacts: City of Beverly Hills Project operation is expected to result in a net increase of 649 daily vehicle trips in comparison to operation of The Beverly Hilton Hotel. During the AM Peak Hour, the project would generate a total of 16 net new trips; during the Midday Peak Hour, the project would generate a total of 84 net new trips; during the PM Peak Hour, the project would generate a total of 57 net new trips; and during the Saturday Midday Peak Hour, the project would generate a total of 65 net new trips.</p> <p>The volume to capacity (V/C) ratio for several of the study intersections would be incrementally worse during the AM peak hour, but no significant change in Level of Service (LOS) would result. The V/C ratio for several of the intersections would become incrementally worse as a result of the proposed project during the AM peak hour, but there is no change in LOS. The maximum increase in V/C ratio is 0.005, which would occur at the intersection of South Santa Monica Boulevard and Wilshire Boulevard during the midday peak hour. Impacts associated with project traffic would be less than significant at signalized intersections in the City of Beverly Hills.</p>	None required.	Less Than Significant
<p>Future "With Project" Operation Impacts: City of Los Angeles The two study intersections located in the City of Los Angeles are N. Santa Monica Boulevard at the South Crossover and Santa Monica Boulevard at Century Park East. N. Santa Monica Boulevard at the South Crossover would experience an increase in V/C ratio ranging from 0.001 to 0.003 during peak hours under the future with project traffic condition. North Santa Monica Boulevard at Century Park East would experience an increase in V/C ratio of 0.001 during all peak hours under the future with project traffic condition. Impacts associated with project traffic would be less than significant at signalized intersections in the City of Los Angeles.</p>	None required.	Less Than Significant
<p>Side-Street Stop-Controlled Intersections: The side-street stop-controlled study intersection at N. Santa Monica Boulevard and Merv Griffin Way would operate at LOS F during all peak hours under future without project traffic conditions and during AM and PM peak hours under future with project conditions. The LOS would improve LOS F to LOS D during the Midday Peak Hour at this intersection under future with project traffic conditions. Impacts associated with project traffic would be less than significant for side-street stop-controlled intersections.</p>	None required.	Less Than Significant

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project

Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Construction Traffic: During the approximately 50-month construction period, the provisions of the Construction Management Plan would be followed. Trucks would exit the site and proceed west to I-405 along Santa Monica Boulevard. However, construction trucks could result in potentially significant impacts because trucks would be traveling along already congested roadways, trucks could deviate from designated travel routes, and the number of trucks required to access the project site during excavation could be as many as 100 trucks per day. As such, construction trucks could result in potentially significant impacts.</p>	<p>TRAF-1: An Environmental Monitor shall be retained that will be responsible for monitoring compliance with the mitigation measures in the adopted Mitigation Monitoring Program. The name, phone number, and other contact information for the Environmental Monitor shall be posted on the construction trailer or other location visible to public view as determined by the Community Development Director. The developer shall deposit funds sufficient to pay for the Environmental Monitor who will be hired by and work for the City.</p> <p>TRAF-2: The Environmental Monitor shall pro-actively inform the public of the ongoing project progress and exceptions to the expected plans. This shall include sending a quarterly mailer to all property owners within 1,000 feet of the exterior boundaries of the property. The developer shall be responsible for the full cost of the mailer including postage. The Environmental Monitor shall also respond to requests for information and assistance when impacts raise special concerns by members of the public.</p> <p>TRAF-3: A contact person shall be assigned and a hotline number shall be published on construction signage placed along the boundary of the project site to address day-to-day issues.</p> <p>TRAF-4: The Developer and Environmental Monitor shall each provide monthly project updates to the City, unless otherwise warranted due to resident complaints.</p>	<p>Less Than Significant</p>

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project

Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
	<p>TRAF-5: The Developer shall revise and finalize the Draft Construction Traffic Management plan to minimize traffic flow interference from construction activities. The Final Construction Traffic Management Plan shall be submitted to the City and shall include plans to accomplish the following:</p> <ul style="list-style-type: none"> - Maintain existing access for land uses in proximity of the project site during project construction; - Schedule deliveries and pick-ups of construction materials to non-peak travel periods, to the maximum extent feasible; - Coordinate haul trucks, deliveries and pick-ups to reduce the potential of trucks waiting to load or unload for protracted periods of time; - Minimize obstruction of through-traffic lanes on Wilshire Boulevard and Santa Monica Boulevard; - Construction equipment traffic from the contractors shall be controlled by flagman; - Identify designated transport routes for heavy trucks and haul trucks which shall be used over the duration of the proposed project; - Schedule vehicle movements to ensure that there are no vehicles waiting off-site and impeding public traffic flow on the surrounding streets; 	

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
	<p>TRAF-5 (continued)</p> <ul style="list-style-type: none"> - Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses; - Prior to submittal to the City of Beverly Hills, the Developer shall provide their Construction Traffic Management Plan to the Beverly Hills Unified School District and the Los Angeles County Metropolitan Transportation Authority for their review and comment. The Developer shall notify the City of Beverly Hills of all comments received from these agencies related to the Construction Traffic Management Plan; - Coordinate with adjacent businesses and emergency service providers to ensure adequate access exists to the project site and neighboring businesses; and - Prohibit parking for construction workers except on the project site and any designated off-site parking locations. These off-site locations will require the approval of the City of Beverly Hills. These off-site parking locations can not include any parking garage in the City of Beverly Hills or any residential streets including Whittier Drive and those streets which connect to Whittier Drive. - The Final Construction Traffic Management Plan shall be submitted and approved by the City no later 30 days prior to commencement of construction. 	

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
	<p>TRAF-6: The Developer shall submit a Construction Workers' Parking Plan identifying parking locations for construction workers. To the maximum extent feasible, all worker parking shall be accommodated on the project site. During demolition and construction activities when construction worker parking cannot be accommodated on the project site, the Plan shall identify alternate parking locations for construction workers and specify the method of transportation to and from the project site for approval by the City 30 days prior to commencement of construction. The Construction Workers Parking Plan must include appropriate measures to ensure that the parking location requirements for construction workers will be strictly enforced. These include but are not limited to the following measures:</p> <ul style="list-style-type: none"> - All construction contractors shall be provided with written information on where their workers and their subcontractors are permitted to park and provide clear consequences to violators for failure to follow these regulations. This information will clearly state that no parking is permitted on residential streets or in public parking structures; - Parking for construction workers shall be permitted only within 500 feet of the nearest point of the project site except within designated areas. The contractor shall be responsible for informing subcontractors and construction workers of this requirement, and if necessary as determined by the Community Development Director, for hiring a security guard to enforce these parking provisions. The contractor shall be responsible for all costs associated with parking and the enforcement of this mitigation measure; and - In lieu of the above, the project applicant / construction contractor has the option of phasing demolition and construction activities such that all construction worker parking can be accommodated on the project site throughout the entire duration of demolition, excavation, and construction activities. 	

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project

Beverly Hills Garden and Open Space Initiative
Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Construction Deliveries: Once equipment and materials are delivered, they would be stored on-site. Given the construction plan for the site, it is anticipated that the site will be able to accommodate staging and storage areas for the construction materials and equipment and impacts associated with staging and storage would be less than significant. However, delivery of material and equipment could create impacts on the adjacent roadway network. Impacts associated with the delivery of material and equipment would be significant.</p>	<p>See Mitigation Measures TRAF-1 through TRAF-6</p>	<p>Less Than Significant</p>
<p>Construction Worker Trips: The number of worker trips is expected to be less than the total peak-hour trip generation associated with operations at the site, following buildout of the project. As with operation of the proposed project, the total number of construction worker trips is not anticipated to significantly impact any of the study intersections. Therefore, impacts on roadway facilities from construction worker trips would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Construction Worker Parking: Construction worker parking could spill over into adjacent areas, such as residential areas along Whittier Boulevard. Workers may choose to park in these areas because they find the off-site parking arrangement cumbersome and want to park at a location closer to the site. This impact is considered potentially significant.</p>	<p>See Mitigation Measures TRAF-1 through TRAF-6</p>	<p>Less Than Significant</p>
<p>Residential Streets: The two residential streets which were evaluated were Whittier Drive and Elevado Drive. No more than 10 percent of all project trips would use Whittier Drive. Based on project trip distribution, it is anticipated that the project would only increase traffic volumes by 1 percent or less to Whittier Drive and Elevado Avenue daily and during all peak hours, result in a less than significant impact.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Stop-Controlled Intersections: The proposed traffic signal at Santa Monica Boulevard and Merv Griffin Way, which is currently stop-sign-controlled, would result in some delay at this intersection for transit vehicles. This delay would be minimal since a majority of the signal cycle would be allocated to Santa Monica Boulevard to facilitate traffic flow on that roadway, and no more than 20 percent of the total signal green time would be allocated to Merv Griffin Way. Additionally, no forthcoming major transit improvements in the study area are planned. Proposed project roadway improvements, including the proposed traffic signal, would have a less than significant impact on transit operations.</p>	<p>None required.</p>	<p>Less Than Significant</p>

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Public Transit Facilities: The City of Beverly Hills does not provide its own transit service and instead relies upon other transit planning agencies, including the Metropolitan Transit Authority (MTA). The project would not conflict with or create inconsistencies with adopted transit system plans, guidelines, policies, or standards. Additionally, as discussed in the traffic study, the project's anticipated increase in transit ridership would be approximately 10 to 20 persons during a 1-hour period. While line specific capacities are not available, approximately 50 to 60 buses stop adjacent to the site during peak hours; the project would generate less than 1 transit trip for every 3 buses. As such, riders generated by the project could be accommodated with the existing transit system and impacts would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Bicycle Facilities: There are no established bicycle paths in the City of Beverly Hills and no planned bicycle facilities along the project frontages. The proposed project would not interfere with planned bicycle facilities and impacts on such facilities would be less than significant. Given that there are no existing or planned bicycle facilities along the project frontage, the proposed project would not conflict with adopted bicycle system, plans, guidelines, policies, or other standard. As a result, the proposed project would have no impact on adopted bicycle systems, plans, guidelines, policies, or other standards.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Pedestrian Facilities: The project site plan proposes to maintain the existing sidewalks along the project frontage on Santa Monica Boulevard and Wilshire Boulevard. The project would add additional driveways entrances along both project frontages; however, it was determined that the project trips would be distributed between these driveways with less than one vehicle per driveway per minute. Given that the number of vehicles utilizing the project driveways would be minimal, it is not anticipated that the vehicles would disrupt pedestrian facilities. As a result, impacts on pedestrian facilities would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>The proposed project includes features that would improve the quality of the walking environment. The proposed project would develop a series of gardens throughout the project site. New sculpture gardens are proposed adjacent to all new buildings and subtropical gardens are proposed between the Wilshire Tower and Residence A. Amenities to be included in the gardens include paved walkways, seating areas, a variety of plant materials, water features (i.e., fountains and ponds), and lighting. The eastern tip of the project site, at the intersection of Wilshire and Santa Monica Boulevards, is proposed as the site of an art terrace and public sculpture. All landscaped areas at the ground level will be available to hotel guests, visitors, residents, and the public, subject to reasonable security measures. The proposed gardens and art terrace would improve the quality of the walking environment. Therefore, the project would not interfere with existing or planned pedestrian facilities and impacts are less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Project Site Access, On-Site Circulation, and Parking: The project consists of several buildings constructed on top of a multi-story subterranean parking structure. The project has a high level of internal accessibility to both pedestrians and vehicles. Persons accessing the site in vehicles will be able to park in the parking garage underneath the structures and then walk to their final destination. While there will be multiple entrances to the parking garage, all areas of the garage are proposed to connect. In addition to accessibility through the underground parking structure, pedestrians can circulate around the buildings at ground level through a variety of pedestrian pathways, roadways, and sidewalks. Therefore, the intra-site accessibility is adequate and impacts would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Curb radii at each of the project driveways were also evaluated. Based on the latest site plan, all of the project driveways have adequate curb radii. Therefore, this impact is less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>The site plans of the parking garage indicate that there will be some internal traffic control devices at the exits to the parking garage. In particular, there are several locations where stop lines are painted on the ground. However, there are no notations on the current site plan related to any internal traffic control devices within the project site, either at the project entrances or exits or along the internal roadway provided by the project. Because of the absence of internal traffic control devices, impacts on on-site circulation would be significant.</p>	<p>TRAF-7: The project applicant shall revise the project site plan to indicate on-site traffic control planned for the project. At a minimum, all traffic control devices should be placed at all project exits onto Wilshire Boulevard, Santa Monica Boulevard, and Merv Griffin Way.</p>	<p>Less Than Significant</p>

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project

Beverly Hills Garden and Open Space Initiative
Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>The project has a high level of accessibility for emergency vehicles, both from a regional and a site perspective. Both Wilshire Boulevard and Santa Monica Boulevard provide direct routes to the project site for emergency vehicles. Once emergency vehicles have reached the site, they can access the on-site structures through Merv Griffin Way, Wilshire Boulevard, or Santa Monica Boulevard. Smaller emergency vehicles, such as police cars and ambulances, would be able to access the subterranean parking structure as necessary and impacts would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Parking for the proposed project would be provided within two subterranean parking garages on site. A four-level subterranean parking structure and a three-level subterranean parking structure are proposed and would provide a total of 1,422 parking spaces. In total, 818 of these spaces are existing spaces and would remain as part of the project for use by the hotel. An additional 604 spaces would be constructed and provided for the residential and restaurant land uses. The project's residential and restaurant parking requirement is estimated to be 569 spaces and the demand is estimated to be 456 spaces, not taking into account credit for the existing parking at Trader Vic's. As indicated above, the project's parking requirement and demand are less than the 604 additional spaces provided by the project. Given that the project's parking supply exceeds both the municipal code requirements and the demand estimates, project's parking supply is sufficient and would not increase off-site parking demand above that which is provided in the immediate project area. Therefore, project-related parking impacts would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>The project would provide pedestrian connections both within the development and to external locations. The project would maintain sidewalks on the two public streets that border the project, Wilshire Boulevard and Santa Monica Boulevard. A sidewalk is also provided on Merv Griffin Way. Within the development, the components of the project are connected through pedestrian walkways. Therefore, the project would provide accessible and safe pedestrian connections between buildings and to adjacent streets and transit facilities and impacts would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Trash pick-ups for all uses would occur in the service area located off of Santa Monica Boulevard. Vehicles would enter via the service driveway, pick-up trash and then exit via a separate service driveway also located along Santa Monica Boulevard. Trash vehicles would not need to enter the parking garages as there are no designated trash pick-up areas within the parking areas.</p> <p>It is likely that there would be intermittent deliveries to the residences. These deliveries would include FedEx trucks, UPS trucks, mail trucks, and other similar vehicles. It is anticipated that these vehicles would park in the circular driveways adjacent to the residences. The driveways have sufficient space to accommodate one or more of these delivery vehicles at a time. Given the project design associated with delivery and service access strategy, the project site plan provides adequate accessibility and facilities for service and delivery vehicles. Therefore, the project impact is less than significant and no mitigation is required.</p>	None required.	Less Than Significant
<p><u>Off-Site Intersection Collision Risk:</u> Section 8-4-4 of the City of Beverly Hills Municipal Code sets minimum driveway spacing at 28 feet. The two closest driveways, which are located along Santa Monica Boulevard, are approximately 40 feet apart. The project site plan indicates that all of the driveways will meet this minimum requirement. Therefore, impacts are less than significant with respect to driveway spacing.</p>	None required.	Less Than Significant
<p>A general rule for signals is that they should be spaced approximately 800 to 1,000 feet from each other under optimum conditions in a corridor. The only traffic signal that is proposed by the project is located at the intersection of Santa Monica Boulevard and Merv Griffin Way. This signal is located at least 800 feet from the adjacent signals on Santa Monica Boulevard. Additionally, the signal is more than 800 feet from the adjacent signal at Merv Griffin Way and Wilshire Boulevard. Therefore, the proposed traffic signal is adequately spaced in relation to adjacent signals. Therefore, impacts associated with traffic signal spacing would be less than significant and no mitigation is required.</p>	None required.	Less Than Significant

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Project site access and circulation were reviewed together with sight distance at the driveways. Appropriate driveway sight distance ensures that vehicles exiting the project site have an unobstructed view of oncoming traffic. The corner sight distance standard was applied to determine whether there would be sufficient sight distance at the project driveways. This standard is provided by Table 405.1A in the California Department of Transportation Highway Design Manual. According to this table, a sight distance of 500 feet should be provided at all project driveways. It was determined that adequate sight distance would be provided at all project driveways and impacts would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>The project would either be constructing or participating in the funding and construction of several improvements at various locations within the study area. Each of these improvements is consistent with general engineering design principles. At the Wilshire Boulevard and Merv Griffin Way intersection, the additional lane would be accommodated by widening the roadway and adequate lane widths would be provided. The new traffic signal at Santa Monica Boulevard and Merv Griffin Way would improve intersection operations and would provide a higher level of safety for vehicles turning into and out of Merv Griffin Way. The capacity improvements along Wilshire Boulevard and Santa Monica Boulevard comply with standard roadway design criteria. Therefore, off-site roadway improvements associated with the proposed project would not result in obstructed sight distance, overly narrow lane width, the removal of exclusive left-turn or right-turn lanes, unsafe timing and phasing designs, or other safety deficiencies. As a result, project impacts would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>As stated above, the following five intersections have a reported accident rate exceeding the statewide average:</p> <ul style="list-style-type: none"> • N. Santa Monica Boulevard /Wilshire Boulevard; • S. Santa Monica Boulevard /Beverly Drive; • S. Santa Monica Boulevard /Wilshire Boulevard; • Wilshire Boulevard/Merv Griffin Way; and • Sunset Boulevard/Whittier Drive. <p>Based on the analysis of the cumulative conditions, it was concluded that the project's increase in vehicular traffic would be less than 1 percent of the total volume at all of these intersections. Given that the project's trip increase is less than the established 5 percent threshold, impacts at intersections where the accident rate exceeds the statewide average would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>

Table 19. Summary of Transportation, Traffic, Parking, and Circulation Impacts, Mitigation Measures, and Significance from the Approved Project

Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>The intersection of South Santa Monica Boulevard and Wilshire Boulevard is the only study intersection that experienced more than five pedestrian/bicycle accidents in the past 3 years. The project's increase in vehicular traffic is less than 1 percent at this location; therefore, the impact associated with pedestrian and/or bicycle accidents with vehicles would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>
<p>Cumulative Construction Impacts: Construction of the proposed project would result in a considerable, and therefore significant, contribution to a cumulatively significant traffic impact as a result of the potential overlapping construction phases of the 9900 Wilshire and Beverly Hilton Revitalization Plan projects.</p>	<p>TRAF-8: The applicant for The Beverly Hilton Revitalization Plan shall coordinate with the applicant for the 9900 Wilshire project during all phases of construction regarding the following:</p> <ul style="list-style-type: none"> - All temporary roadway closures shall be coordinated to limit overlap of roadway closures; - All major deliveries for both projects shall be coordinated to limit the occurrence of simultaneous deliveries. The applicants shall ensure that deliveries of items such as concrete and other high-volume items shall not be done simultaneously; - The applicants shall coordinate regarding the loading and unloading of delivery vehicles. Any off-site staging areas for delivery vehicles shall be consolidated and shared; and - Applicants or their representatives shall meet on a regular basis during construction to address any outstanding issues related to construction traffic, deliveries, and worker parking. 	<p>Less Than Significant</p>
<p>Cumulative Operation Impacts: Cumulative impacts associated with the proposed project and related projects would be less than significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan. Table 2.0-1: Summary Table of Project Impacts and Mitigation Measures.

This table incorporates information from the Draft EIR, as well as any changes noted in the Final EIR.

Table 20. Summary of Geology and Soils Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Surface Rupture		
The project site is not located within an Alquist-Priolo Earthquake Zone. The closest Alquist-Priolo Earthquake Fault Zone is approximately 3.4 miles southeast of the project site. Given this distance, impacts to people or structures from surface rupture are less than significant.	None required.	Less Than Significant
Seismic Groundshaking		
Several active faults are located within 10 miles of the project site; as such, the project site may be subject to strong ground shaking in the event of an earthquake. Therefore, people and structures may be exposed to potential adverse effects from seismic groundshaking.	GEO-1: The proposed project shall be designed and constructed in accordance with recommendations contained in the Report of Geotechnical Investigation prepared by Mactec Engineering and Consulting, Inc. and in accordance with all applicable local, state, and federal regulations, such as the Uniform Building Code (UBC) and Title 9 of the Beverly Hills Municipal Code.	Less Than Significant
Liquefaction		
The project site is not within a State of California designated Liquefaction Hazard Zone. In addition, density and laboratory testing of the subsurface materials at the site indicates the liquefaction potential on the project site is low. The potential for seismic-related ground failure is less than significant.	None required.	Less Than Significant
Ground Failure		
While the project site is not located within a designated Liquefaction Hazard Zone, due to the shallow depth of groundwater and required excavation activities, there is the potential for the project to be constructed on a geologic unit or soil that is unstable or could become unstable as a result of construction-related activities. This impact is potentially significant.	See GEO-1.	Less Than Significant
Expansive Soils		
Upper soils on the project site have medium expansive potential. Additionally, the shallow depth of groundwater on the site has the potential to result in significant geologic and soils impacts.	See GEO-1.	Less Than Significant

Table 20. Summary of Geology and Soils Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Cumulative Impacts</p> <p>The closest related project is the proposed redevelopment of the former Robinsons-May property at 9900 Wilshire Boulevard, west of Merv Griffin Way. Construction of the proposed underground parking structure on the Beverly Hilton project site, east of Merv Griffin Way, and construction of the underground parking structure on the 9900 Wilshire site have the potential to result in unstable soils. However, impacts are expected to remain site-specific because each project would be required to ensure soils are stable on the respective sites through compliance with the UBC and site-specific geotechnical mitigation requirements. Additionally, the two sites and underground parking structures would be separated by Merv Griffin Way, which is 40 feet in width. Therefore, the Beverly Hilton project's incremental contribution to cumulative impacts associated with geological instability would be less than cumulatively considerable and, therefore, not significant.</p>	<p>None required.</p>	<p>Less Than Significant</p>

Notes:

Impact Sciences. 2008. Final Environmental Impact Report for the Beverly Hilton Revitalization Plan. Table 2.0-1: Summary Table of Project Impacts and Mitigation Measures. This table incorporates information from the Draft EIR, as well as any changes noted in the Final EIR.

Table 21. Summary of Hazards and Hazardous Materials Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
<p>Asbestos - Lead Paint, mold, PCBs</p> <p>The Phase I Environmental Site Investigation indicated a moderate potential for the existing building materials to contain asbestos. All asbestos containing materials would be removed and disposed of prior to demolition or renovation in accordance with the requirements of SCAQMD Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities. The Phase I also indicated that suspect lead-based paint, visible mold growth, and old unused fluorescent light ballasts potentially containing Polychlorinated Biphenyls (PCBs) exist on the project site. Construction activities therefore have the potential to temporarily result in upset and/or accident conditions involving the accidental release of hazardous materials into the environment. Operation of the proposed project would not include uses with the potential to generate large quantities of hazards and/or toxic materials, and thus would not have a high potential to cause fires or result in accidents from hazardous materials or substances.</p>	<p>HAZ-1: The sampling of all suspect asbestos-containing materials (ACMs) such as roofing, wall finishes and non-friable floor finishes, shall be conducted prior to demolition. If the suspect ACMs are confirmed to contain asbestos, their removal in accordance with applicable regulations shall be necessary prior to impact by renovation or demolition activities.</p> <p>HAZ-2: Construction activities shall comply with SCAQMD Rule 1403 – Asbestos Emissions from Demolition / Renovation Activities. This rule is intended to limit asbestos emissions from demolition or renovation of structures and the associated disturbance of ACMs generated or handled during these activities. The rule requires that SCAQMD be notified before demolition or renovation activity occurs. This notification includes a description of structures and methods utilized to determine the presence or absence of asbestos. All ACMs found on the site shall be removed prior to demolition or renovation in accordance with the requirements of Rule 1403.</p> <p>HAZ-3: Prior to demolition activities, the sampling of suspect materials for lead content shall be conducted. If these surfaces are determined to contain concentrations of lead at or above regulatory limits, their removal by a licensed abatement contractor in accordance with applicable regulations shall be necessary prior to demolition or renovation activities.</p>	<p>Less Than Significant</p>
<p>Hazardous Materials within 0.25 Mile of a School</p> <p>El Rodeo School is located north and west of the project site and across Wilshire Boulevard and therefore lies within 0.25 mile of the project site. Construction activities have the potential to result in temporary upset and/or accident conditions involving the accidental release of hazardous materials into the environment. Operation of the proposed project would not include uses with the potential to release hazardous materials or substances into the environment. Impacts would be less than significant.</p>	<p>HAZ-4: During demolition or renovation activities, the airborne lead concentration shall not exceed the Permissible Exposure Level (PEL), as required by the California Occupational Health and Safety Administration (Cal/OSHA), Title 8, California Code of Regulations (CCR), Construction Safety Orders for Lead, Section 1532.1.</p> <p>HAZ-5: The demolition debris waste stream shall be analyzed for lead content during materials separation to ensure compliance with U.S. Environmental Protection Agency (EPA) regulations related to transportation and disposal of hazardous materials.</p> <p>HAZ-6: All personnel workers potentially exposed to lead-containing materials shall be trained and protected in accordance with federal OSHA regulations.</p> <p>HAZ-7: Fluorescent light ballast labels shall be inspected prior to demolition. If the ballast labels do not include the statement, "No PCBs," the ballast(s) shall be properly removed by a licensed PCB removal contractor and disposed of as PCB-containing waste prior to demolition.</p>	<p>Less Than Significant</p>

Table 21. Summary of Hazards and Hazardous Materials Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Listed Hazardous Materials Sites		
<p>The project site is not listed on any federal or state databases reviewed during preparation of the Phase I. All other listed sites are greater than 800 feet from the project site. As such, development of the project site would result in less than significant impacts and risks to the public and the environment. As indicated in the Regulatory Agency Records Review discussion, the project site is listed on the Cal-EPA Permitted UST (Underground Storage Tank) List due to the presence of one 15,000-gallon UST containing diesel fuel. The UST is permitted by the SCAQMD under permit No. D20797, is not leaking, and is not posing any known hazard to the site. Implementation of the proposed project would involve the continued use of this UST for operation of the emergency power generator on site and would not create an environmental concern above that generated by existing usage of the UST. The continued operation of the UST would take place in accordance with applicable regulatory procedures. Based on compliance with applicable regulations the continued use of the UST would not create a significant hazard to the public or environment.</p>	<p>None required.</p>	<p>Less Than Significant</p>
Cumulative Impacts		
<p>Potentially hazardous impacts associated with a proposed project usually occur on a project-by-project basis. Because project implementation would comply with regulatory controls to abate the site-specific hazards prior to demolition activities and the project is required to implement mitigation measures MM-HAZ-1 through MM-HAZ-7 to reduce impacts to less than significant levels, the proposed project's incremental contribution to cumulative impacts would be less than considerable, since the harmful substances and subsequent exposure to a health hazard would be removed from the project site. Therefore, the project's contribution to cumulative impacts is not significant.</p>	<p>See Mitigation Measures HAZ-1 through HAZ-7.</p>	<p>Less Than Significant</p>

Notes:

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Table 22. Summary of Hydrology and Water Quality Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Surface Water Quality - Construction		
<p>During project construction, demolition and grading activities would expose soils to erosion and temporarily increase suspended solids in surface water flows originating on the project site during a storm event. Additionally, dewatering may be necessary during excavation because of shallow groundwater, and could degrade downstream water quality through discharge of treated water into the City storm drain system. This could violate water quality standards and waste discharge requirements and is a potentially significant impact.</p>	<p>HYDRO-1: Prior to the start of soil-disturbing activities at the site, a Notice of Intent (NOI) and Stormwater Pollution Prevention Plan (SWPPP) shall be prepared in accordance with, and in order to partially fulfill, the California SWRCB Order No. 99-08-DWQ, National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002 (General Construction Permit). The SWPPP shall meet the applicable provisions of Sections 301 and 402 of the Clean Water Act (CWA) and Title 9, Chapter 4, Article 5, Storm Water and Urban Runoff Pollution Control from the Beverly Hills Municipal Code by requiring controls of pollutant discharges that utilize best available technology (BAT) and best conventional pollutant control technology (BCT) to reduce pollutants. Examples of BAT/BCT that may be implemented during site grading and construction could include straw hay bales, straw bale inlet filters, filter barriers, and silt fences.</p> <p>HYDRO-2: Prior to issuance of any grading or building permits, the project applicant shall prepare and submit to the City of Beverly Hills a Standard Urban Stormwater Mitigation Plan (SUSMP), to be prepared in accordance with the Los Angeles County Manual for the Standard Urban Storm Water Mitigation Plan, which details the requirements of the SUSMP.</p>	<p>Less Than Significant</p>
Surface Water Quality - Operation		
<p>Permanent dewatering of subterranean buildings and structures may be necessary and could degrade downstream water quality through discharge of treated water into the City storm drain system, in violation of water quality standards and waste discharge requirements. This is a potentially significant impact.</p>	<p>See Mitigation Measures HYDRO-1 through HYDRO-4</p>	<p>Less Than Significant</p>
<p>Potential disposition of urban pollutants generated during operation of the proposed project, including pollutants generated by motor vehicles and the maintenance of landscaped areas, could result in the potential for the project to violate water quality standards and waste discharge requirements. This is a potentially significant impact.</p>	<p>See Mitigation Measures HYDRO-1 through HYDRO-4</p>	<p>Less Than Significant</p>
Groundwater Depletion		
<p>Construction and operation of the proposed project would not deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficiency in aquifer volume or a lowering of the local groundwater table level. Minimal water would be required during construction activities on the project site, and the amount of pervious area on the project site would be increased over existing conditions during both construction and operation of the project. Water for the project would be supplied by the Metropolitan Water District (MWD), which receives only 10 percent of its water supply from groundwater. Impacts would be less than significant.</p>	<p>None Required</p>	<p>Less Than Significant</p>

Table 22. Summary of Hydrology and Water Quality Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Alteration of Surface Hydrology		
Construction and operation of the proposed project would not substantially alter the existing drainage pattern of the site or area such that substantial erosion or siltation would occur or such that surface runoff would result in flooding on- or off-site. The project site and the surroundings are relatively flat and best management practices (BMPs) would be implemented during construction to minimize runoff from the project site. Drainage impacts would be less than significant.	None Required	Less Than Significant
New Stormwater Drainage Facilities		
Project implementation would increase the area of pervious surface on the project site. The project would not increase storm water runoff volumes or exceed the current stormwater drainage system capacity.	None Required	Less Than Significant
Project implementation would increase the area of pervious surface on the project site. The project would not increase stormwater runoff volumes and no new stormwater facilities would be required as a result of project implementation.	None Required	Less Than Significant
Cumulative Impacts		
Given the location of the proposed project and Citywide related projects, it is not expected that cumulative development would substantially alter the existing drainage pattern of the area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation, flooding, or the exceedance of existing or planned stormwater drainage systems. The Ballona Creek watershed, within the limits of the City of Beverly Hills, is composed mainly of urban uses, with remaining open spaces being devoted to parks and similar uses not likely to be developed. As a result, most of the drainage system in the watershed consists of developed, engineered storm channels. Given that development patterns in the City have been established, it is unlikely that there would be substantial alteration of drainage systems and watercourses in those areas, because the alignment of such facilities have been established and capacities determined based on the uses located in the watershed. This indicates that the amount of runoff would not substantially increase, thereby avoiding substantial increases in erosion, siltation, flooding, and preventing the exceedance of the stormwater drainage system. The proposed project and Citywide related projects would also be required to comply with the SWPPP and SUSMP requirements and adopt BMPs to reduce the occurrence of erosion, siltation, and pollutants. Consequently, there would not be a cumulatively significant impact with the development of the project.	None Required	Less Than Significant

Notes:

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Table 23. Summary of Population and Housing Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Project implementation would create 120 new condominium units, thereby resulting in a population increase of approximately 269 individuals (applying the City of Beverly Hills Population Factor of 2.24 persons/household). In the short-term, housing and population growth generated by the project would meet or exceed growth forecast projections by SCAG. However, project-generated housing and population growth would be accounted for in the longer-term 30-year planning horizon. Impacts would be less than significant.	None Required	Less than Significant
Cumulative Impacts		
Although the housing and population growth generated by the proposed project in conjunction with citywide related projects may exceed SCAG projections in the short term, the growth is accounted for within the 30-year planning period. Therefore cumulative impacts associated with growth would be less than significant.	None Required	Less than Significant

Notes:

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Table 24. Summary of Public Services Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Fire Protection and Emergency Services		
<p>The Beverly Hills Fire Department (BHFD) indicates that the proposed traffic signal at the intersection of Merv Griffin Way and Santa Monica Boulevard has the potential to slow emergency response times and inhibit access to the site. This is a potentially significant impact.</p>	<p>FIRE-1: The proposed signal at the intersection of Santa Monica Boulevard and Merv Griffin Way shall be outfitted with an Opticom device, a traffic signal pre-emption used to control signalized intersections to allow the BHFD to provide a safe response route and to decrease response times to emergencies.</p>	<p>Less Than Significant</p>
<p>The City Engineer has indicated that the fire flow of 1,000 to 1,500 gallons per minute (gpm) measured at hydrants serving the project site may not be adequate flow for the project. This is a potentially significant impact.</p>	<p>FIRE-2: The 8-inch and 10-inch sections of the main feeding Hydrants No. 339, No. 340, No. 341, No. 342, and No. 343 along Wilshire Boulevard shall be replaced with a 12-inch main in order to achieve adequate fire flow for the project. The line shall be replaced from the intersection of Wilshire Boulevard and Santa Monica Boulevard to the western boundary of the project site. The project applicant shall pay its "fair share" of the cost to upgrade 8-inch and 10-inch sections of the main feeding Hydrants No. 339, No. 340, No. 341, No. 342, and No. 343 along Wilshire Boulevard. Payment for this upgrade shall be made prior to the issuance of any building permit. Upgrading of the main shall be completed concurrently with project construction and prior to building occupancy. The project applicant shall coordinate with the City so that construction of the upgraded main shall not conflict with construction of the proposed project.</p>	<p>Less Than Significant</p>
Cumulative Impacts		
<p>Implementation and operation of future development projects in the City would generate revenues accrued to the City's General Fund from property and sales taxes that could be used to help meet the capital outlay for fire service. As long as the City allocates adequate funding to the department so that it may continue to meet its service obligations and as long as the BHFD maintains ultimate review over building codes, emergency access and fire safety, no significant cumulative environmental impacts would occur. Therefore, the cumulative impact of the proposed project and related projects on fire protection and emergency services would be less than significant.</p>	<p>None Required</p>	<p>Less Than Significant</p>
Police Protection		
<p>Project implementation would introduce 120 new condominium units, thereby resulting in a population increase of approximately 269 new residents. During project construction, the use of private security at the project site, the use of flagmen and other standard construction practices would result in less than significant police protection impacts. Additionally, for both construction and operation of the project, the Beverly Hills Police Department (BHPD) considers existing service to be adequate to service the project site. Impacts would be less than significant.</p>	<p>None Required</p>	<p>Less Than Significant</p>

Table 24. Summary of Public Services Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Cumulative Impacts		
As with the proposed project, each identified related project would generate tax revenues accrued to the City's General Fund, which could then be used by the City to fund the capital outlay for police service. Additionally, payment of development impact fees may be required by the City. Based on the above, the project impacts, in combination with impacts associated with the cumulative projects within the City would result in less than significant impacts on police protection services.	None Required	Less Than Significant
Schools		
Project implementation would generate approximately 84 new students. Although Beverly Hills Unified School District (BHUSD) schools are operating either at or close to maximum capacity, BHUSD accommodates all City residents first and allocates excess capacity to students residing outside the school district boundaries. Additionally, as required by Senate Bill (SB) 50, payment of fees will be required of the project applicant. BHUSD has adequate capacity to accommodate all students residing within the City of Beverly Hills and impact fees would be paid consistent with requirements set forth in SB 50, and impacts would be less than significant.	None Required	Less Than Significant
Cumulative Impacts		
All students within the City of Beverly Hills are accommodated within the BHUSD schools, and for schools with surplus capacity, permits are allocated randomly based on availability. With the introduction of 490 additional school-aged children, all City of Beverly Hills students would be accommodated within BHUSD schools and excess capacity would continue to be allocated to students residing outside the City. As such, no significant cumulative impacts to schools would result from implementation of the proposed project in combination with related project.	None Required	Less Than Significant
Recreation and Parks		
Project implementation would introduce 120 new condominium units and a population increase of approximately 269 new residents, which would reduce the parkland-to-resident ratio from 2.14 acres per 1,000 residents to 2.13 acres per 1,000 residents. This reduction would not require the construction of new or expansion of existing parkland. Additionally, the proposed project would pay the Parks and Recreational Facilities Construction Tax, amounting to approximately \$4.1 million, to the City Recreation and Parks Department. Impacts would be less than significant.	None Required	Less Than Significant

Table 24. Summary of Public Services Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Cumulative Impacts		
As with the proposed project, each identified related project would be subject to the Parks and Recreation Facilities Construction Tax, which would then be used by the City to fund additional programs that compensate for substandard parkland availability. Based on the availability of private recreational amenities to residents and the fact that the decrease in parkland to resident ratio is not substantial, cumulative project impacts on park and recreation facilities are considered to be less than significant.	None Required	Less Than Significant
Library Services		
The project-related population increase of approximately 269 new residents may incrementally increase the demand for library services and would reduce the present ratio of 2.54 square feet of library space per capita to 2.52 square feet of library space per capita. Because of the availability of other libraries in the vicinity of the project site and the current adequacy of service at the City's main library branch, impacts would be less than significant.	None Required	Less Than Significant
Cumulative Impacts		
All future residents of the related projects would contribute revenue to the tax base that could be used to expand library services; additionally, development impact fees may be required by the City. Based on this marginal decrease and the fact that the City Public Library determines the level of service to be adequate, the cumulative impact of the proposed project in combination with citywide related projects on library services is considered less than significant.	None Required	Less Than Significant

Notes:

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Table 25. Summary of Utilities and Service Systems Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Water		
<p>The project is estimated to result in a gross water demand of approximately 61,973,920 gallons per year, or 190.2 acre-feet per year (AFY), which equates to a net increase in water demand of approximately 7,147,110 gallons per year or 21.9 AFY over water demand from the existing uses on the project site. This additional demand represents 14 percent of the City's projected increased water demand by 2030. The City Public Works Department confirms that there would be sufficient water supply available to serve the project and no potential service impacts would result.</p>	None Required	Less Than Significant
<p>According to the BHFD, although sufficient water supply exists to serve the project, the fire flow of 1,000 to 1,500 gallons per minute from adjacent fire hydrants may be inadequate for the project upon buildout. Impacts on fire flow are potentially significant.</p>	<p>WTR-1: The 8-inch and 10-inch sections of the main feeding Hydrants No. 339, No. 340, No. 341, No. 342, and No. 343 along Wilshire Boulevard shall be replaced with a 12-inch main in order to achieve adequate fire flow for the project. The line shall be replaced from the intersection of Wilshire Boulevard and Santa Monica Boulevard to the western boundary of the project site. The project applicant shall pay its "fair share" of the cost to upgrade 8-inch and 10-inch sections of the main feeding Hydrants No. 339, No. 340, No. 341, No. 342, and No. 343 along Wilshire Boulevard. Payment for this upgrade shall be made prior to the issuance of any building permit. Upgrading of the main shall be completed concurrently with project construction and prior to building occupancy. The project applicant shall coordinate with the City so that construction of the upgraded main shall not conflict with construction of the proposed project.</p>	Less Than Significant
Cumulative Impacts		
<p>The City projects an increased water demand of 1,381 AFY between 2005 and 2030. The proposed project and related projects within the City would amount to 25 percent of the projected increase. Therefore, the anticipated water demand of Citywide related projects is accounted for within the planning horizon. The 2005 UWMP indicates that the City has sufficient water supplies to meet demand during the planning period. Based on the availability of supply to meet the anticipated water demand, cumulative impacts to water services would be less significant.</p>	None Required	Less Than Significant
Wastewater		
<p>The project is estimated to result in gross wastewater generation of approximately 49,579,136 gallons per year, which represents a net increase in wastewater generation of 5,717,688 gallons per year over wastewater generation from the existing uses on the project site. The City Public Works Department anticipates that the existing wastewater system would be able to accommodate the additional flow generated by the project and that the project would not require the construction of new wastewater treatment facilities or an expansion of existing facilities. However, the proposed restaurant use has the potential to generate a heavier discharge of fats, oils, and grease. This is a potentially significant impact.</p>	<p>WW-1: The proposed restaurant shall install a Fat, Oil, and Grease (FOG) Interceptor to remove these substances from its wastewater before entering the sanitary sewer system. This device helps prevent these substances from clogging the sanitary sewer system. The device shall be regularly inspected by the Los Angeles County Department of Public Works.</p>	Less Than Significant
<p>Sufficient treatment capacity exists at the Hyperion Wastewater Treatment Plant to accommodate the wastewater discharged by the proposed project. Because Hyperion has adequate capacity to meet the anticipated demand in addition to existing demand, impacts on the wastewater treatment system would be less than significant.</p>	None Required	Less Than Significant

Table 25. Summary of Utilities and Service Systems Impacts, Mitigation Measures, and Significance from the Approved Project Beverly Hills Garden and Open Space Initiative Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Cumulative Impacts		
<p>The City will require capacity upgrades to the sewer conveyance system prior to occupancy of each project to avoid overloading the system on a project-by-project basis. Developer fees will also be assessed on each project to pay for these improvements. Similarly, the City will also require that temporary sewer lines be installed and operational prior to construction to avoid service interruptions on a project-by-project basis. Therefore, given that the total anticipated wastewater increase would represent less than 1 percent of excess treatment capacity, that the above requirements would apply to all proposed projects and that each project would be responsible for ensuring that adequate sewage conveyance infrastructure is in place to handle anticipated sewage loads, the impact of the proposed project and citywide related projects on wastewater service would be less than significant.</p>	None Required	Less Than Significant
Solid Waste		
<p>The anticipated volume of debris generated from demolition activities on the project site has been estimated at approximately 23,000 cubic yards, of which over 50 percent would be diverted from landfills in compliance with AB 939. Given that the four landfills serving the City of Beverly Hills have adequate capacity to accommodate the demolition and construction debris, impacts to solid waste during construction would be less than significant.</p> <p>During project operation, the project would generate approximately 789 tons of solid waste per year, which represents a net increase of 167 tons per year in comparison to current hotel operations on the project site. Project-generated waste would result in a negligible increase in total disposal at the four landfills. Impacts would be less than significant.</p>	None Required	Less Than Significant
Cumulative Impacts		
<p>The Solid Waste Division of the Department of Public Works further indicates that adequate landfill capacity exists to accommodate citywide related projects and that no service problems are anticipated. Due to sufficient landfill capacity and waste diversion measures, cumulative impacts to solid waste services would be less than significant.</p>	None Required	Less Than Significant
Energy		
Electricity		
<p>The project's gross electricity demand is estimated at approximately 3,678,729 kilowatt-hours (kWh) per year. The annual electricity demand of the existing hotel is estimated to be approximately 3,196,116 kWh. Therefore, the project is estimated to result in a net increase of approximately 482,613 kWh in electricity demand when compared to the existing hotel. This represents an approximately 15 percent increase in electricity demand over the existing hotel demand; therefore, the project would not result in a substantial increase in energy demand, would not exceed the existing or planned capacity of energy facilities, and would not require the provision of new or altered facilities. Impacts would be less than significant.</p>	None Required	Less Than Significant
<p>The project could require alterations to existing distribution facilities or the installation of new facilities or equipment such as transformers. This is a potentially significant impact.</p>	<p>ENG-1: Prior to submittal of final plans, the applicant shall make necessary alterations to the generation or distribution system as required by Southern California Edison (SCE). The applicant shall then provide to the Beverly Hills Community Development Department a letter from SCE that states that electricity will be provided to the proposed project and that all applicable energy conservation features have been incorporated into the project design.</p>	

Table 25. Summary of Utilities and Service Systems Impacts, Mitigation Measures, and Significance from the Approved Project
 Beverly Hills Garden and Open Space Initiative
 Beverly Hills, California

Project Impacts	Mitigation Measures	Significance After Mitigation
Electricity Cumulative Impacts		
<p>The implementation of each of the proposed citywide projects is accounted for within statewide projections prepared by the California Energy Commission, and operation of the proposed project in combination with each of the identified related projects would not result in a substantial increase in electricity demand relative to the availability of supply such that impacts would be significant. Therefore, Impacts would be less than significant.</p>	None Required	Less Than Significant
Natural Gas		
<p>The project's gross natural gas demand is estimated at approximately 233 million cubic feet (mcf) per year. The annual gas demand of the existing hotel is estimated to be approximately 248 mcf. Therefore, implementation of the project is estimated to result in a net decrease of 15 mcf in natural gas demand per year within the City when compared to the existing hotel. The Gas Company has adequate supply to serve the project in addition to its existing commitments. Impacts would be less than significant.</p>	None Required	Less Than Significant
<p>Although the project is projected to have a lower gas demand than the existing hotel, minor alterations to local distribution facilities, including conveyance infrastructure, may be required. This is a potentially significant impact.</p>	<p>ENG-2: Prior to submittal of final plans, the applicant shall complete a load survey in accordance with the Gas Company procedures and make any necessary alterations to the distribution system as required by the Gas Company. The applicant shall then provide to the Beverly Hills Community Development Department a letter from the Gas Company, which states that natural gas will be provided to the proposed project and that all applicable energy conservation features have been incorporated into the project design.</p>	Less Than Significant
Natural Gas Cumulative Impacts		
<p>Cumulative project demand would result in an additional 142.5 mcf per year, which represents 0.6 percent of the projected increase during the 2005 to 2025 planning period. Given that cumulative project demand is accounted for within the planning period, the Gas Company has adequate supply to serve the project in addition to its existing commitments. The project would not result in a substantial increase in energy demand relative to the availability of supply. Furthermore, as with the proposed project, alterations to distribution facilities would be implemented based on the specific needs of the project as determined by a load survey through consultation with the Gas Company. Therefore, the cumulative impact to natural gas would be less than significant.</p>	None Required	Less Than Significant

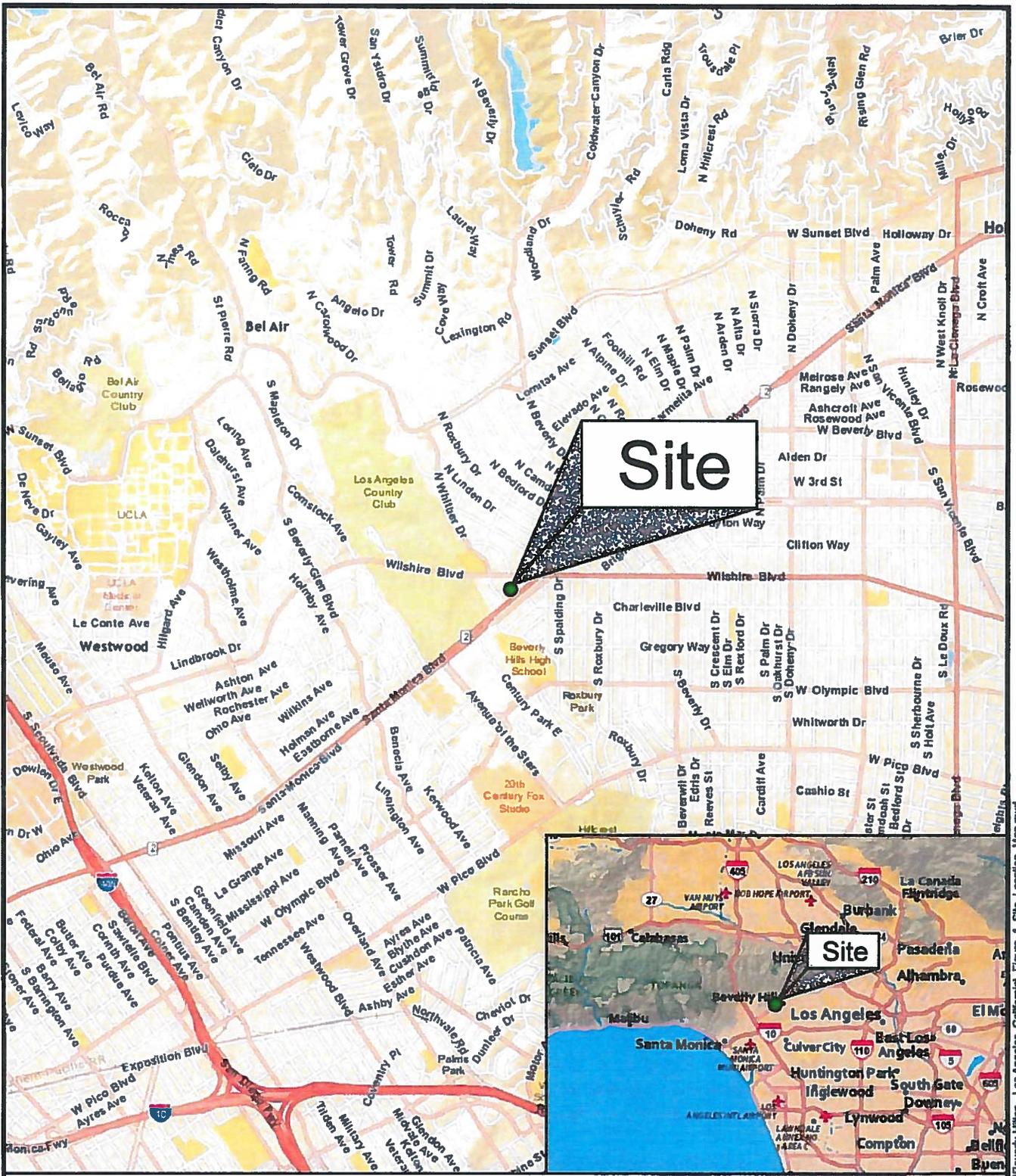
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Environmental Assessment of the Beverly Hills Garden
and Open Space Initiative
Beverly Hills, California

FIGURES



SOURCE:
 National Geographic World Map
 ESRI ArcGIS Online
 © 2010 National Geographic Society
 Reference Data: National Geographic, Esri,
 DeLorme, HERE, IPC, NRCAN, METI

Map Created with ESRI ArcMap and National Geographic World Map ©1996-2015 National Geographic Holdings [maps.nationalgeographic.com]



CONTOUR INTERVAL 40 FEET
 NATIONAL GEODETIC VERTICAL DATUM OF 1929
 140,000



Path: Z:\01_Projects\Beverly Hills - Los Angeles, California\Figure_1_Site_Location_Map.mxd

	<h2>Site Location Map</h2>	<h2>Figure 1</h2>
<p>DRAFTED BY: KMY</p>	<p>Date: 3/4/2018</p>	<p>The Beverly Hilton Hotel 9876 Wilshire Boulevard Beverly Hills, California 90210</p>
		<p>PROJECT: 04-38559A</p>



Site Layout and Surrounding Properties

Figure 2

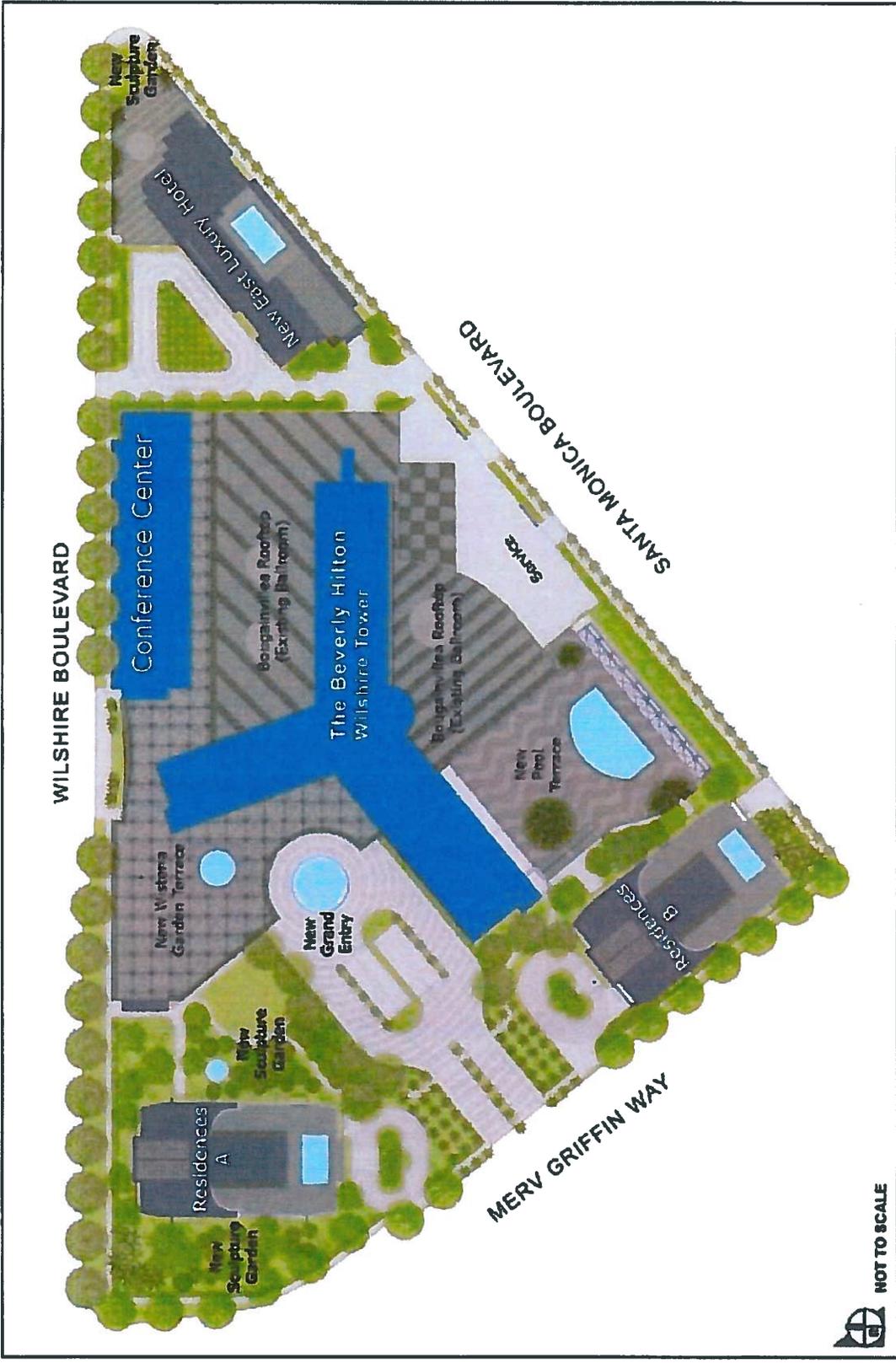
The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210



DRAFTED BY: KMY

Date: 3/4/2016

PROJECT: 04-38559A



 NOT TO SCALE

SOURCE: Ocaso West Realty, LLC - February 2016

RAMBOLL ENVIRON

DRAFTED BY: KMY

Date: 5/16/2016

Approved Project Site Plan

The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

Figure
3

PROJECT: 04-38559A

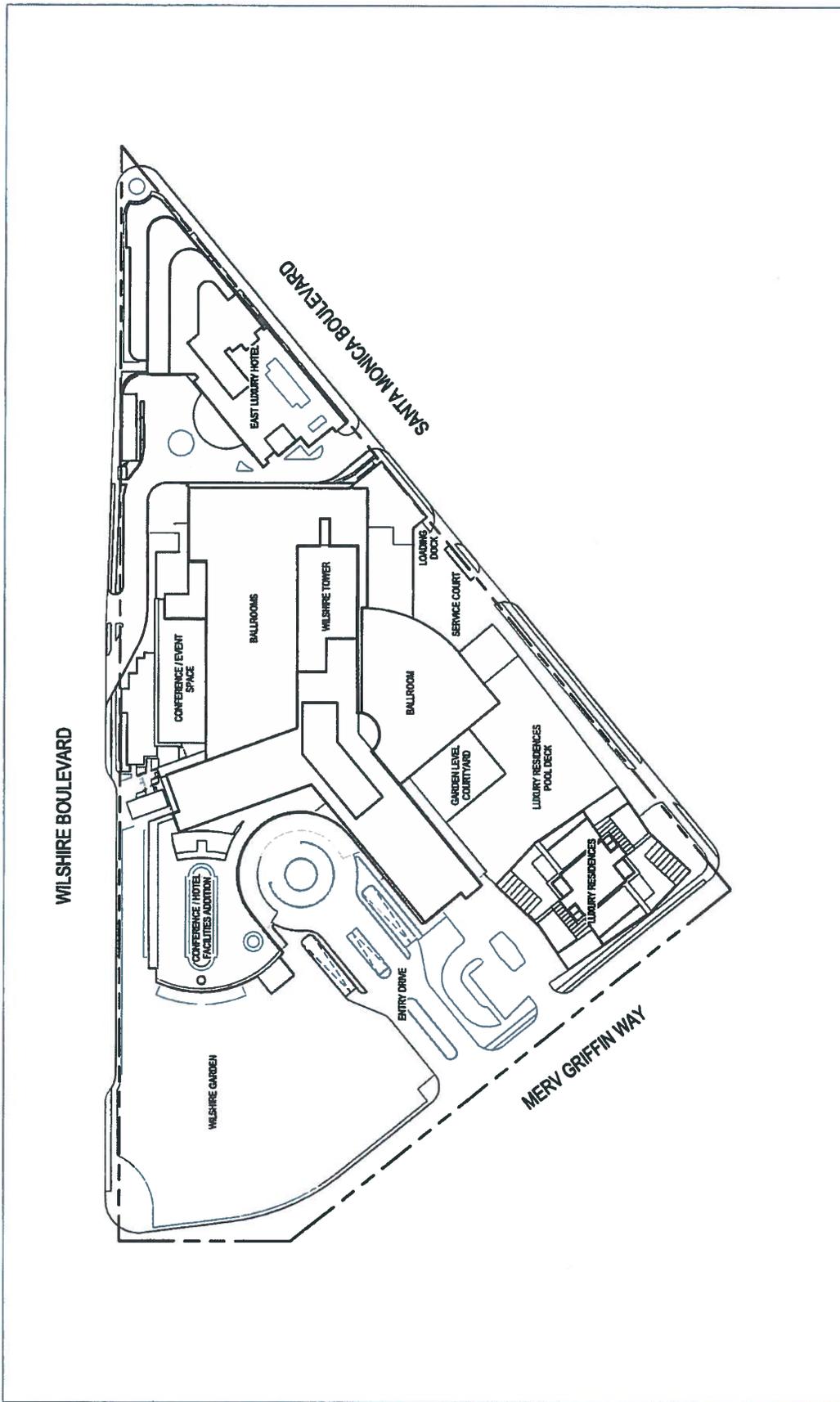


Figure
4

Modified Project Site Plan

The Beverly Hilton Hotel
9876 Wilshire Boulevard
Beverly Hills, California 90210

PROJECT: 04-38558A

RAMBOLL ENVIRON

DRAFTED BY: KMY

DATE: 2/12/2016



Figure 5

Location of the Sensitive Land Uses in the Vicinity of the Project Site

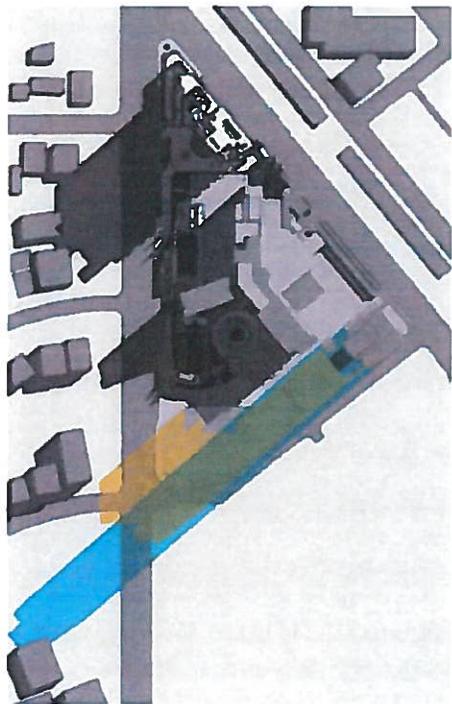
The Beverly Hilton Hotel
9876 Wilshire Boulevard
Beverly Hills, California 90210

RAMBOLL ENVIRON

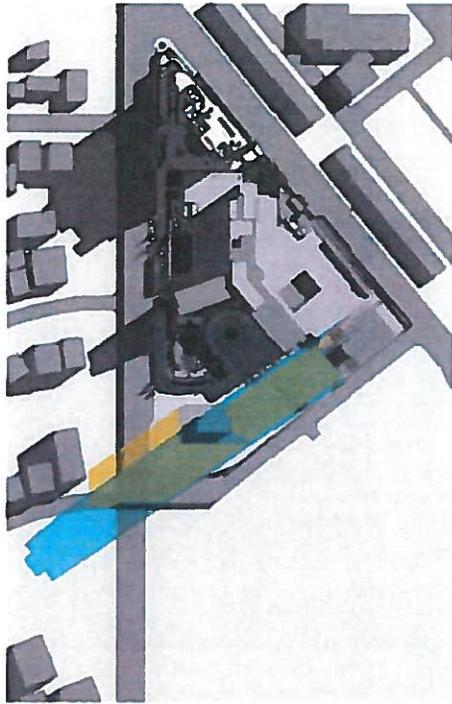
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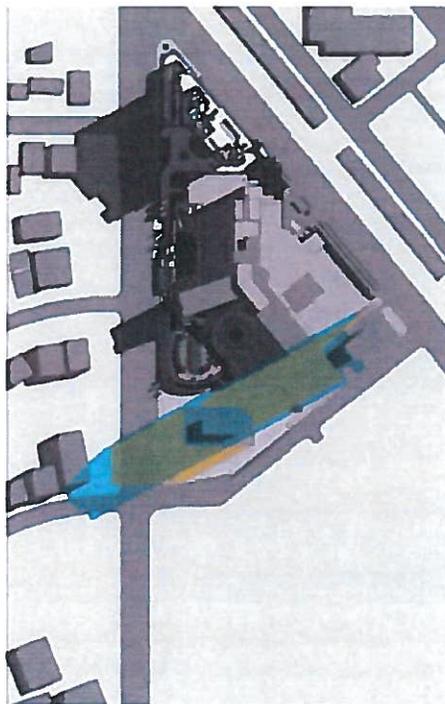
PROJECT: 04-38559A



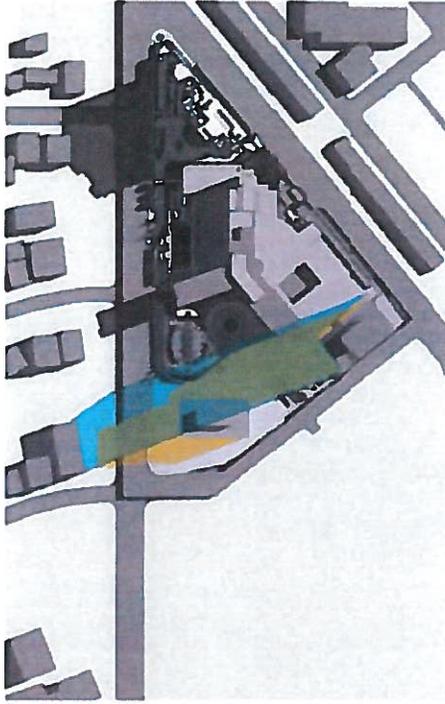
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2008 Approved Residential Building Shadows
 2016 Proposed Initiative Residential Building Shadows

RAMBOLL ENVIRON

DRAFTED BY: KMY

DATE: 5/12/16

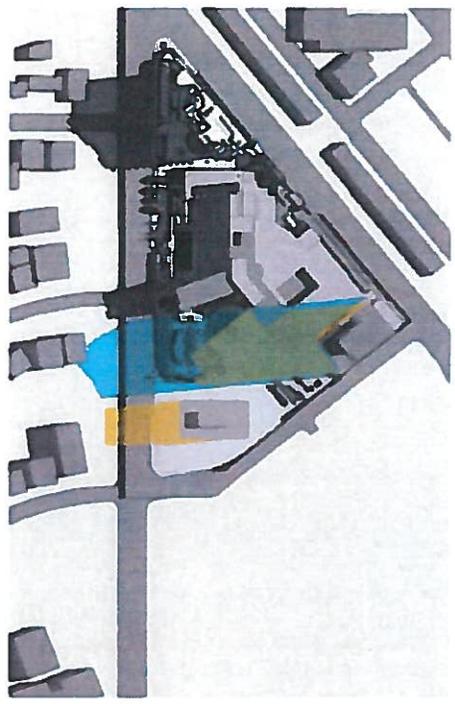
Winter Solstice

The Beverly Hilton Hotel
9876 Wilshire Boulevard
Beverly Hills, California 90210

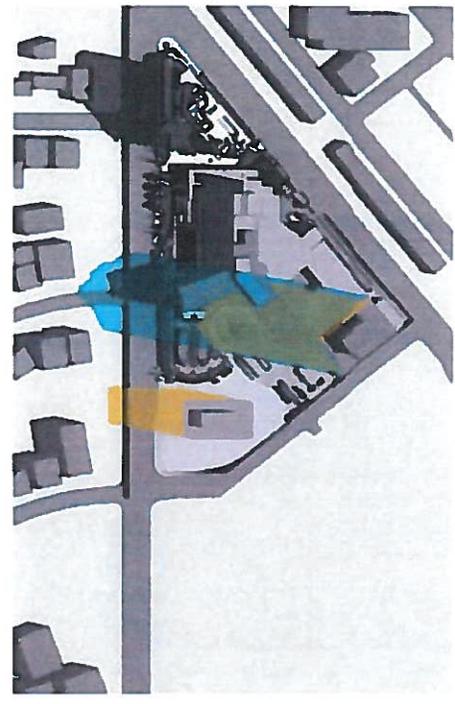
Figure

6a

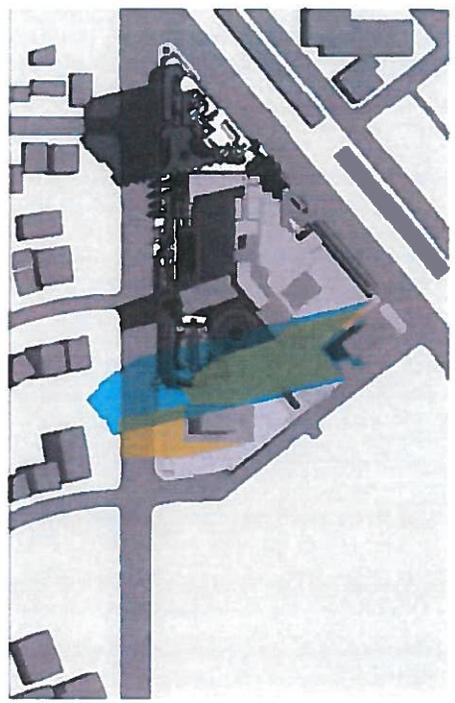
PROJECT: 04-38559A



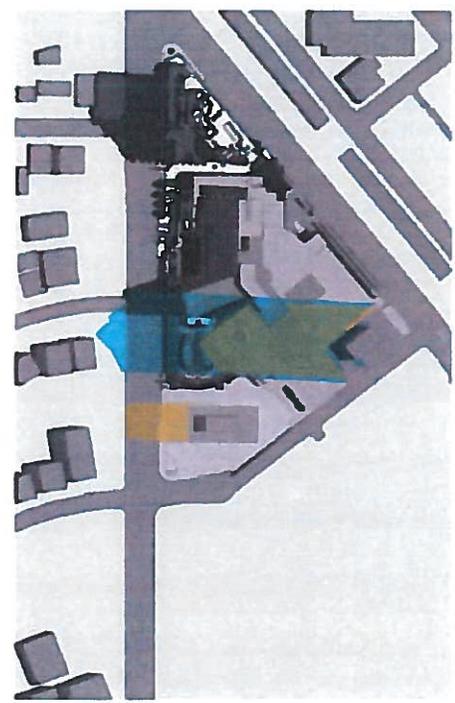
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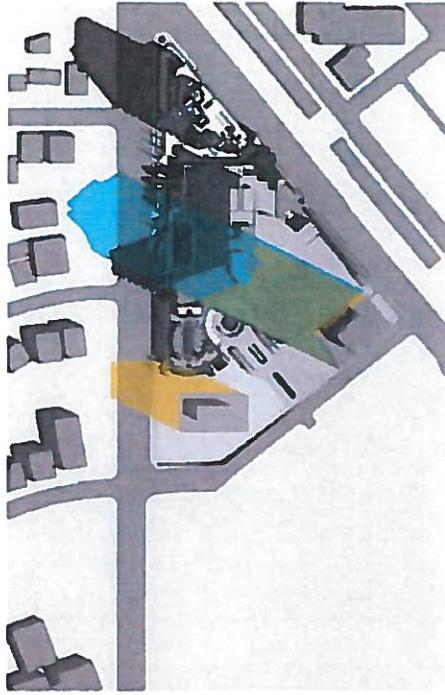
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2008 Approved Residential Building Shadows
 2016 Proposed Initiative Residential Building Shadows

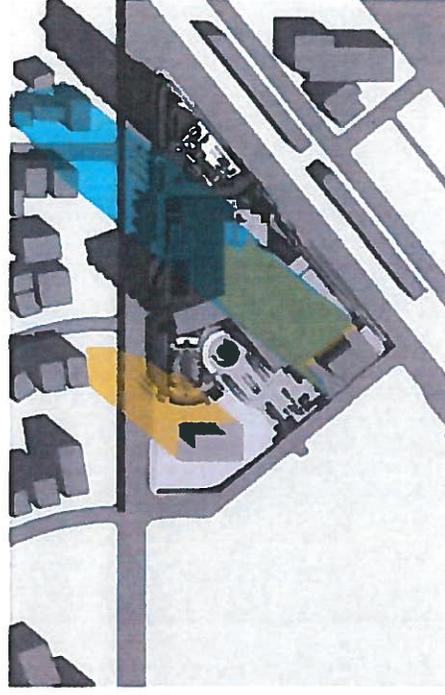
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 PROJECT: 04-38559A

Winter Solstice
 The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

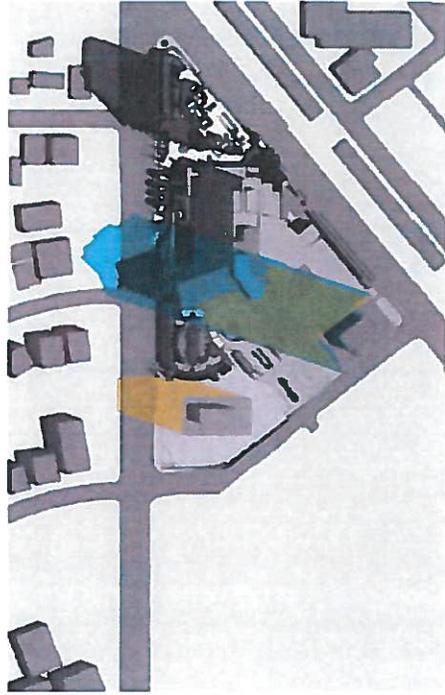
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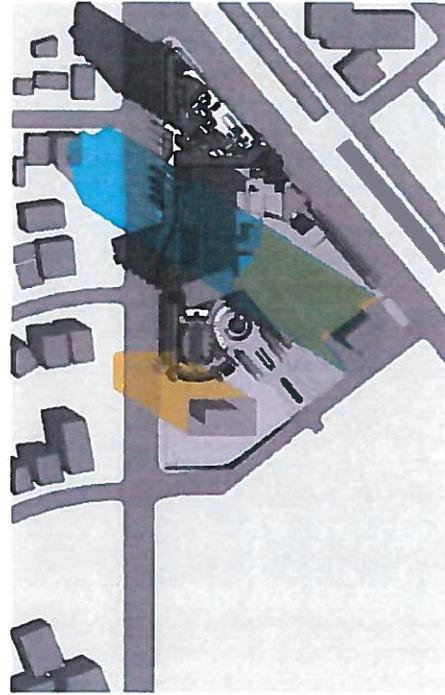
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2008 Approved Residential Building Shadows
 2016 Proposed Initiative Residential Building Shadows

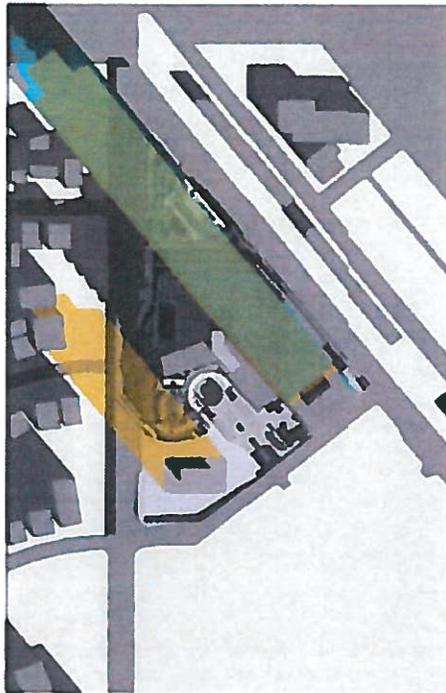
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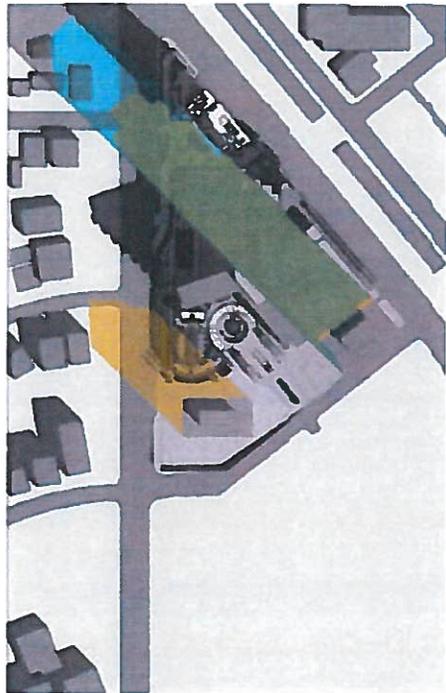
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Winter Solstice
 The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

Figure
6C
 PROJECT: 04-38559A



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- 2006 Approved Residential Building Shadows
- 2016 Proposed Initiative Residential Building Shadows

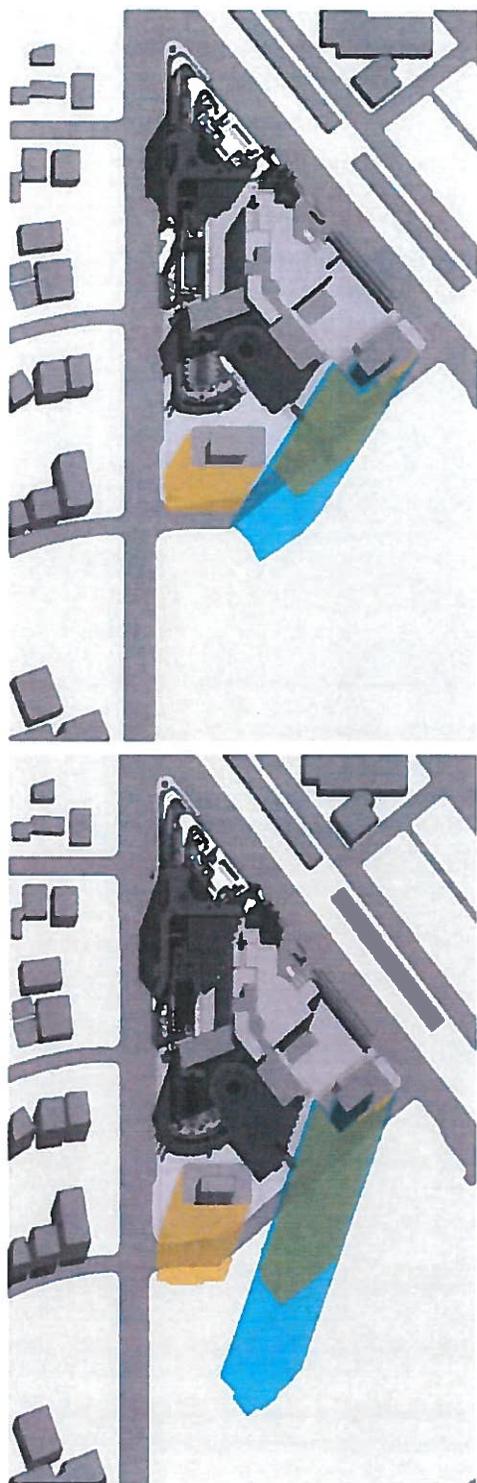
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6d

PROJECT: 04-38559A

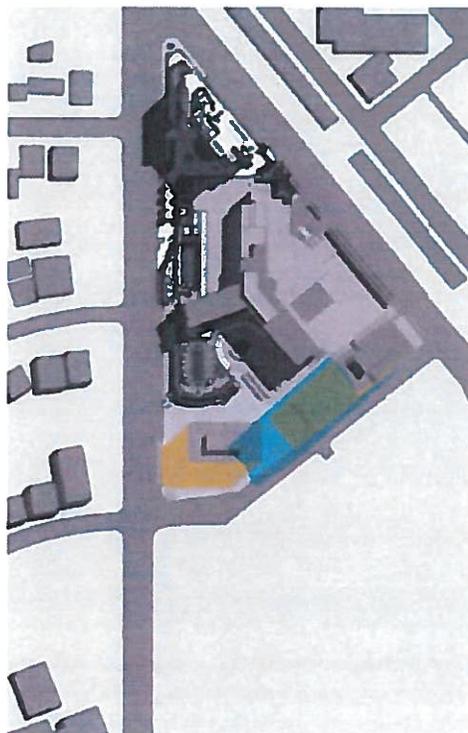
Winter Solstice
 The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

RAMBOLL ENVIRON

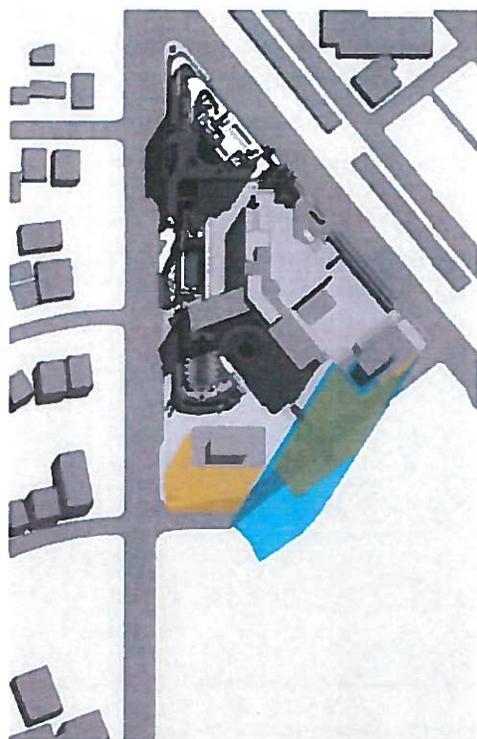
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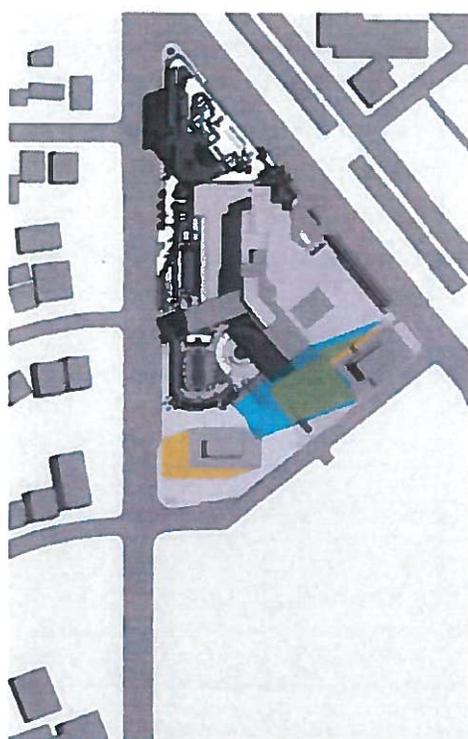
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2008 Approved Residential Building Shadows
 2016 Proposed Initiative Residential Building Shadows

RAMBOLL ENVIRON

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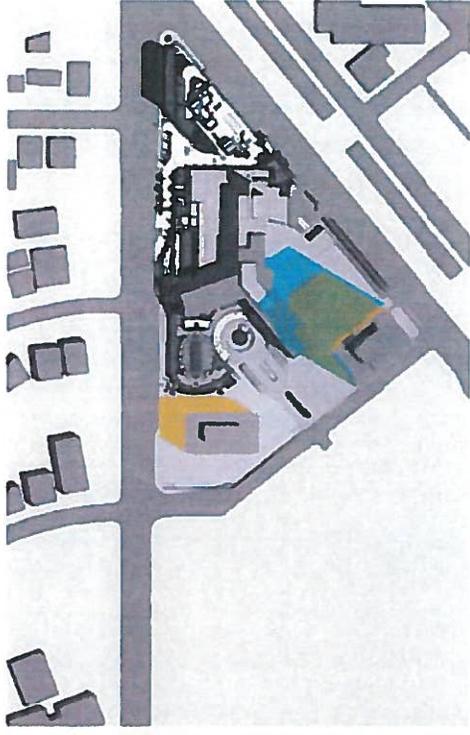
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Autumn/Spring Equinox

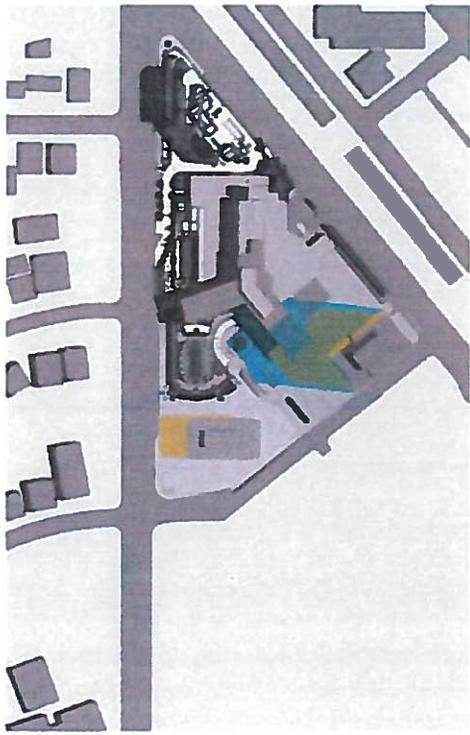
The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

Figure
7a

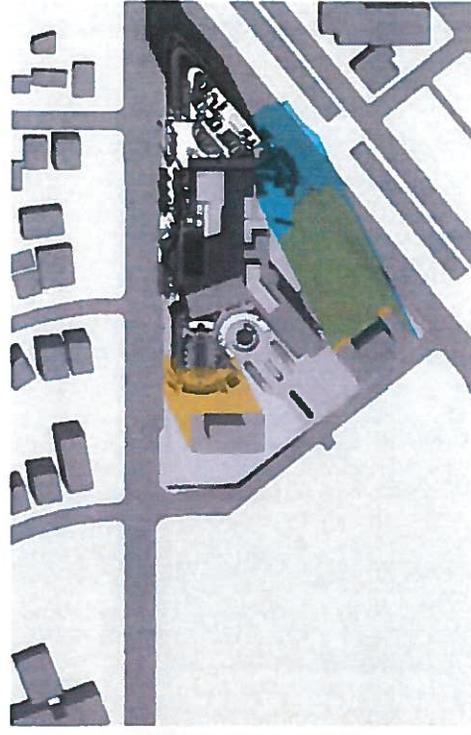
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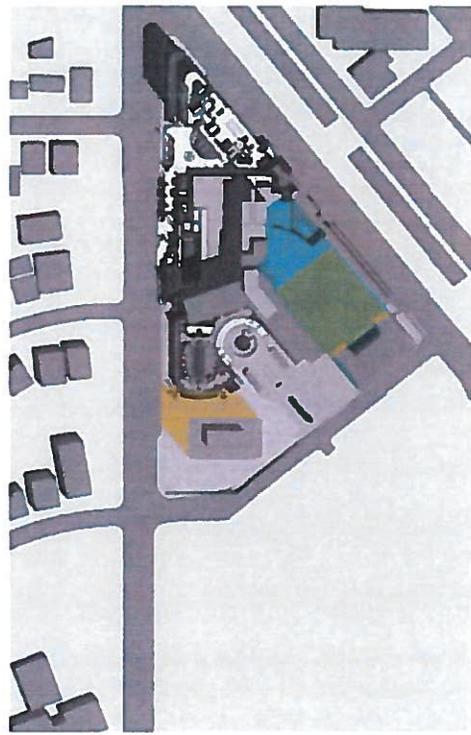
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- 2008 Approved Residential Building Shadows
- 2016 Proposed Initiative Residential Building Shadows

RAMBOLL ENVIRON

DRAFTED BY: KMY

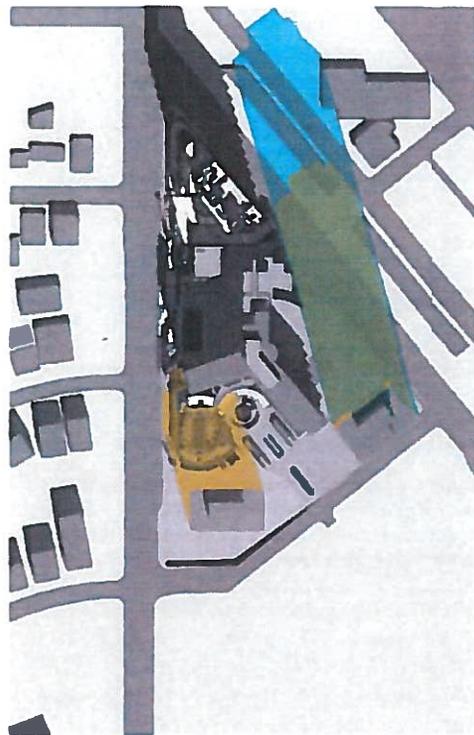
DATE: 5/12/16

Autumn/Spring Equinox

The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

Figure
7b

PROJECT: 04-38559A



4 PM



2008 Approved Residential Building Shadows



2016 Proposed Initiative Residential Building Shadows

Autumn/Spring Equinox

The Beverly Hilton Hotel
9876 Wilshire Boulevard
Beverly Hills, California 90210

Figure

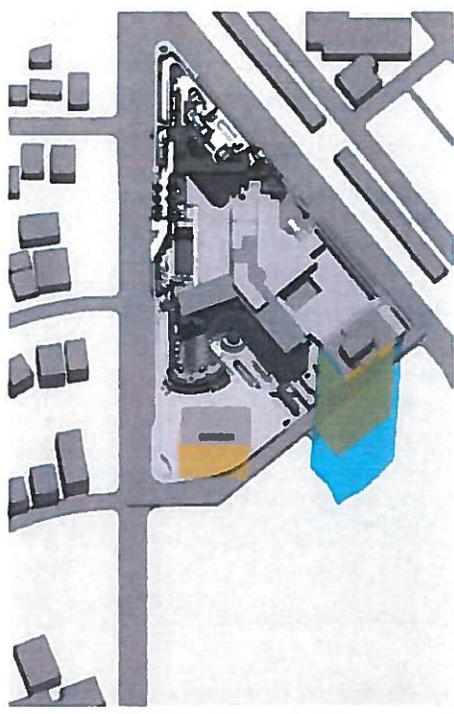
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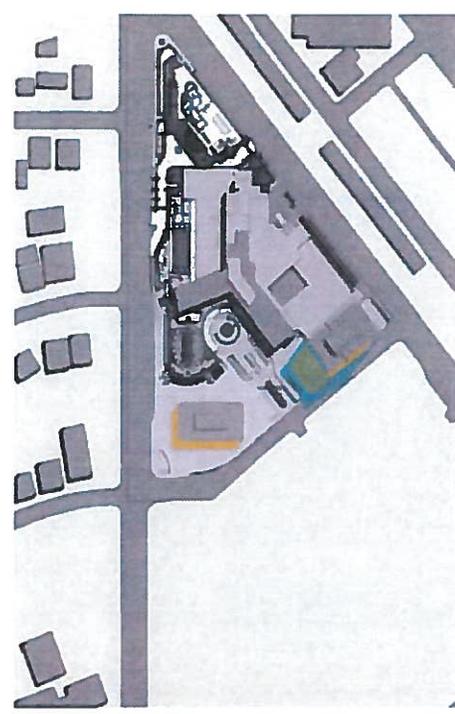
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PROJECT: 04-38559A

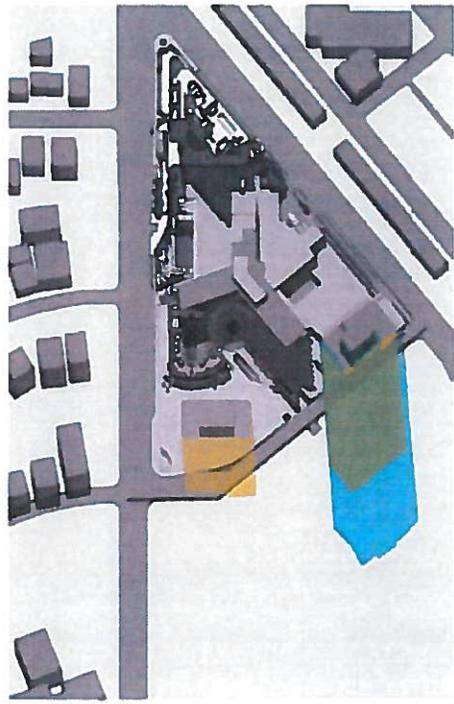




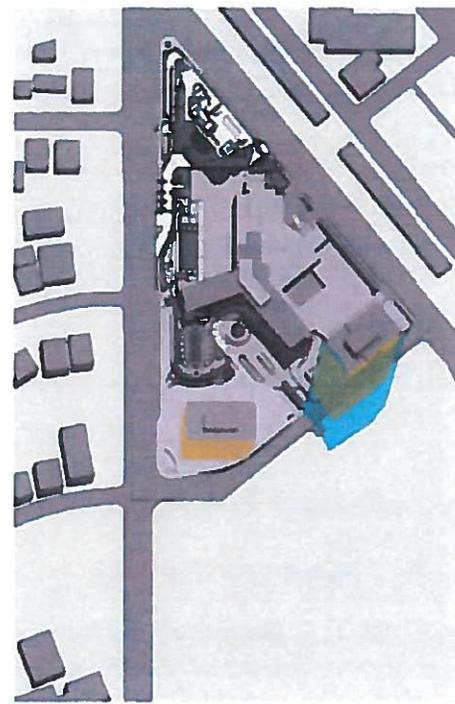
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2008 Approved Residential Building Shadows
 2016 Proposed Initiative Residential Building Shadows

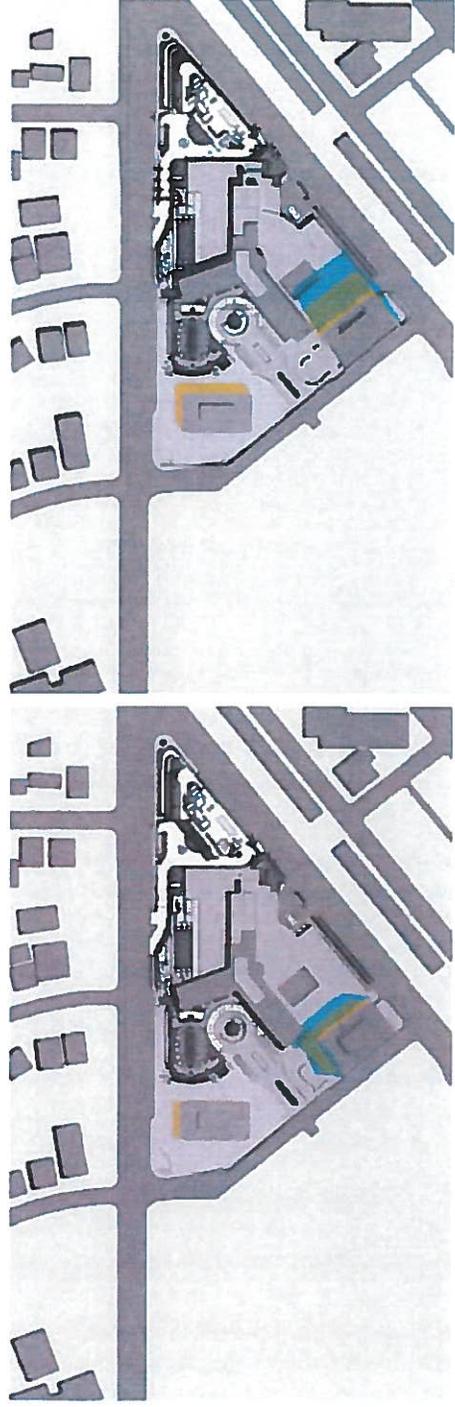
Summer Solstice
 The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

Figure 8a

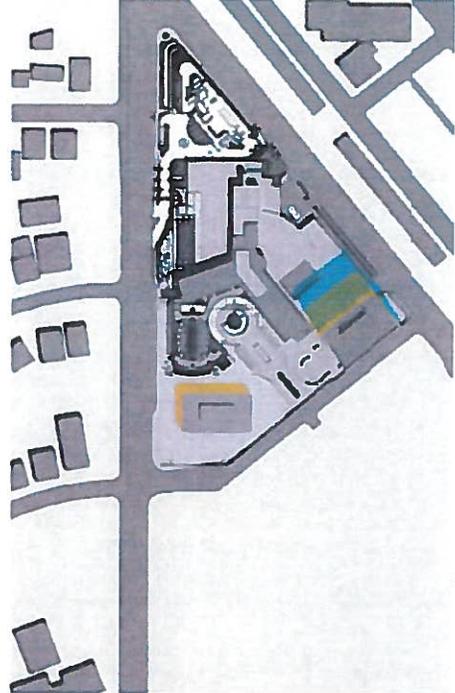
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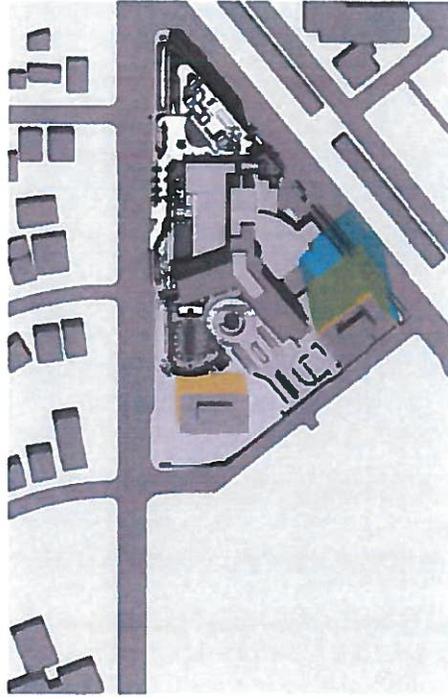
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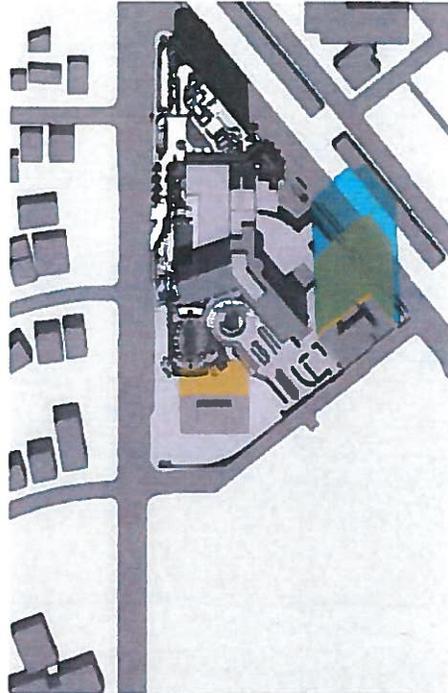
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2008 Approved Residential Building Shadows
 2016 Proposed Initiative Residential Building Shadows

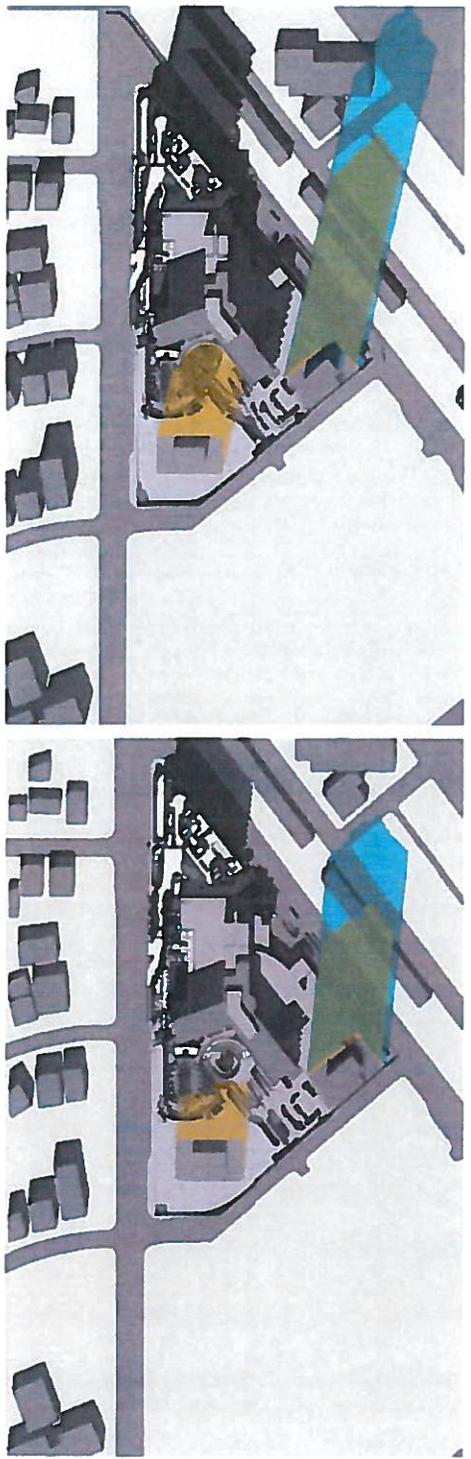
RAMBOLL ENVIRON

DRAFTED BY: KMY DATE: 5/12/16

Summer Solstice
 The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

Figure 8b

PROJECT: 04-38559A



5 PM

4 PM

- 2008 Approved Residential Building Shadows
- 2016 Proposed Initiative Residential Building Shadows

RAMBOLL ENVIRON

DRAFTED BY: KMY

DATE: 5/12/16

Summer Solstice
 The Beverly Hilton Hotel
 9876 Wilshire Boulevard
 Beverly Hills, California 90210

Figure
8C

PROJECT: 04-38559A

Privileged and Confidential
Attorney Work Product

Environmental Assessment of the Beverly Hills Garden
and Open Space Initiative
Beverly Hills, California

**APPENDIX A
TRAFFIC EVALUATION FOR THE PROPOSED
SITE PLAN MODIFICATIONS**



Overland Traffic Consultants, Inc.
952 Manhattan Beach Boulevard #100
Manhattan Beach, CA 90266
Phone (310) 930 - 3303
E-mail: otc@overlandtraffic.com

March 30, 2016

Mr. Douglas Moreland
Oasis West Realty, LLC
1800 Century Park East, Suite 500
Los Angeles, CA 90067

RE: Traffic Evaluation for the Proposed Site Plan Modifications
(The Beverly Hills Garden and Open Space Initiative)

Dear Mr. Moreland,

Overland Traffic Consultants, Inc. has evaluated the changes in traffic associated with the site plan modifications proposed by The Beverly Hills Garden and Open Space Initiative.

The modifications considered in this evaluation consist of removing the north residential condominium Building A, access, and loading and replacing it with garden and open space. Building A's residential units would be relocated to a single Residences Building located on the Santa Monica Boulevard frontage at Merv Griffin Way. Figure 1 illustrates the current and proposed site plans.

This assessment evaluates the site plan revisions and analyzes whether the modified site plan is consistent with the original conclusions contained in the EIR for The Beverly Hilton Revitalization Plan.

Our consistency evaluation considers the Project's traffic generation, the Project's residential access points and the Project's traffic impact and mitigation.

Traffic Generation

The Project is approved for 110 condominium units; 36 units in Building A and 74 units in Building B. The EIR prepared for the Project by the City of Beverly Hills analyzed trips generated by 120 condominium units in Residences A and B in addition to the other development proposed for the site.

The EIR concluded that the Project would have no significant unmitigated operational impacts to transportation, circulation, or parking.

A Traffic Engineering and Transportation Planning Consulting Services Company

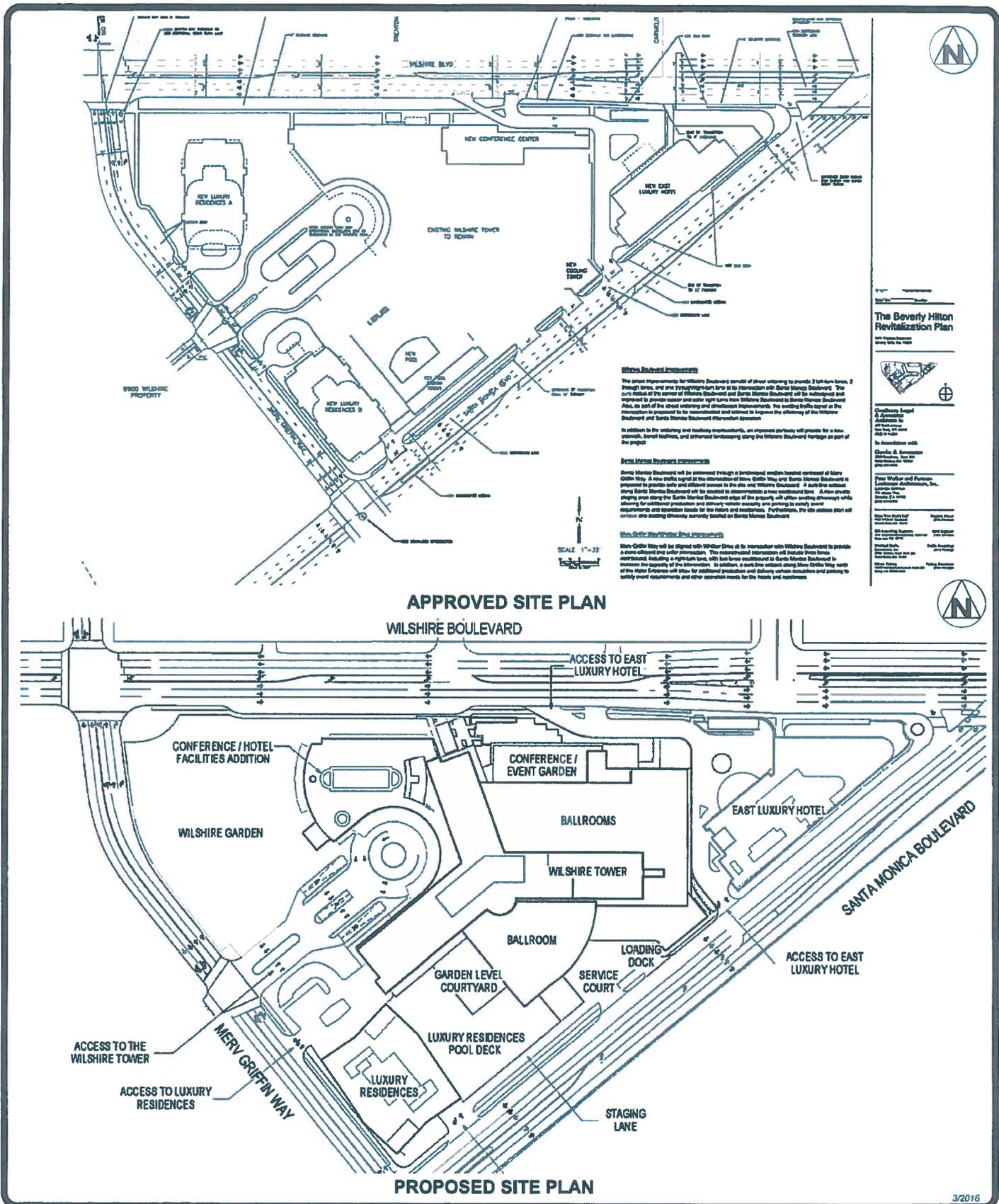


FIGURE 1
THE BEVERLY HILLS GARDEN AND OPEN SPACE INITIATIVE

Overland Traffic Consultants, Inc.
 24325 Main Street #202, Santa Clarita, CA 91371
 (661)799-8423, OTC@overlandtraffic.com



Trips - As with the approved Project, a total of one hundred twenty (110) units are planned for the Residences Building. Using the condominium trip generation rates developed for the Project EIR, the 110 condominium are estimated to generate 391 weekday vehicle trips with an estimated 31 morning weekday peak hour trips, 36 mid-day and afternoon weekday peak hour trips, and 36 mid-day Saturday peak hour trips, as shown in Table 1.

**Table 1
Condominium Trip Generation ¹**

	<u>Daily</u>	<u>AM</u>	<u>Mid-day</u>	<u>PM</u>	<u>Saturday Mid-day</u>
Trip Rate (per unit) ²	3.55	0.28	0.33	0.33	0.29
Approve Project Trips (110 units)	391	31	36	36	32
Modified Project Trips (110 units) ³	391	31	36	36	32
EIR Trips (120 units)	426	34	40	40	35

¹The new garden and open space area is not expected to generate a measureable number of daily trips or during peak hours.

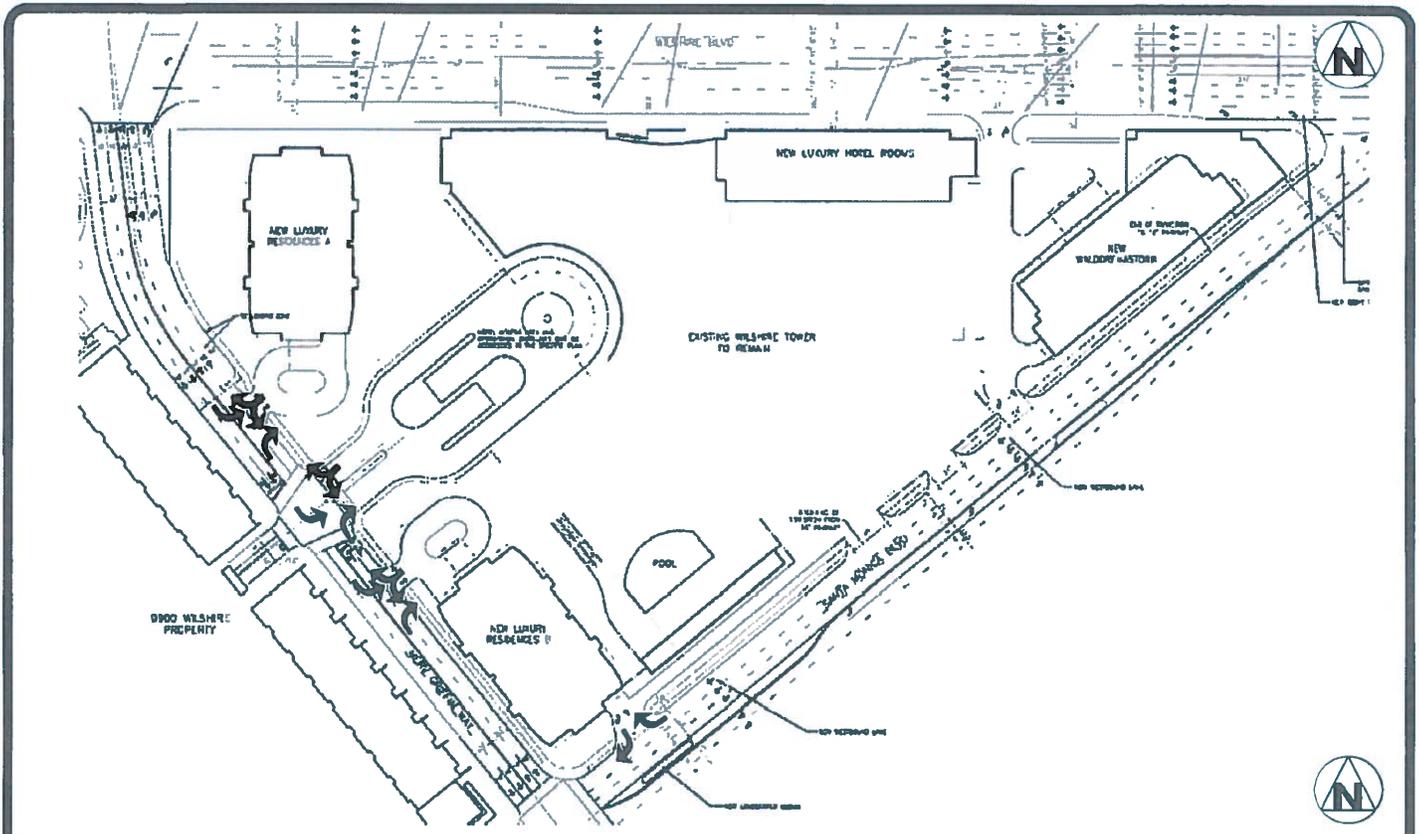
²Trip rates from 2007 Fehr & Peers transportation analysis completed for City of Beverly Hills as part of City's environmental review process for The Beverly Hilton Revitalization Plan.

³Ten (10) staff rooms of less than 500 square feet, to be provided as sleeping quarters, are not separate residential units under The Beverly Hills Garden and Open Space Initiative. The staff rooms may be used only in conjunction with one of the 110 residential units and will not generated trips not already assumed in the residential trip rate.

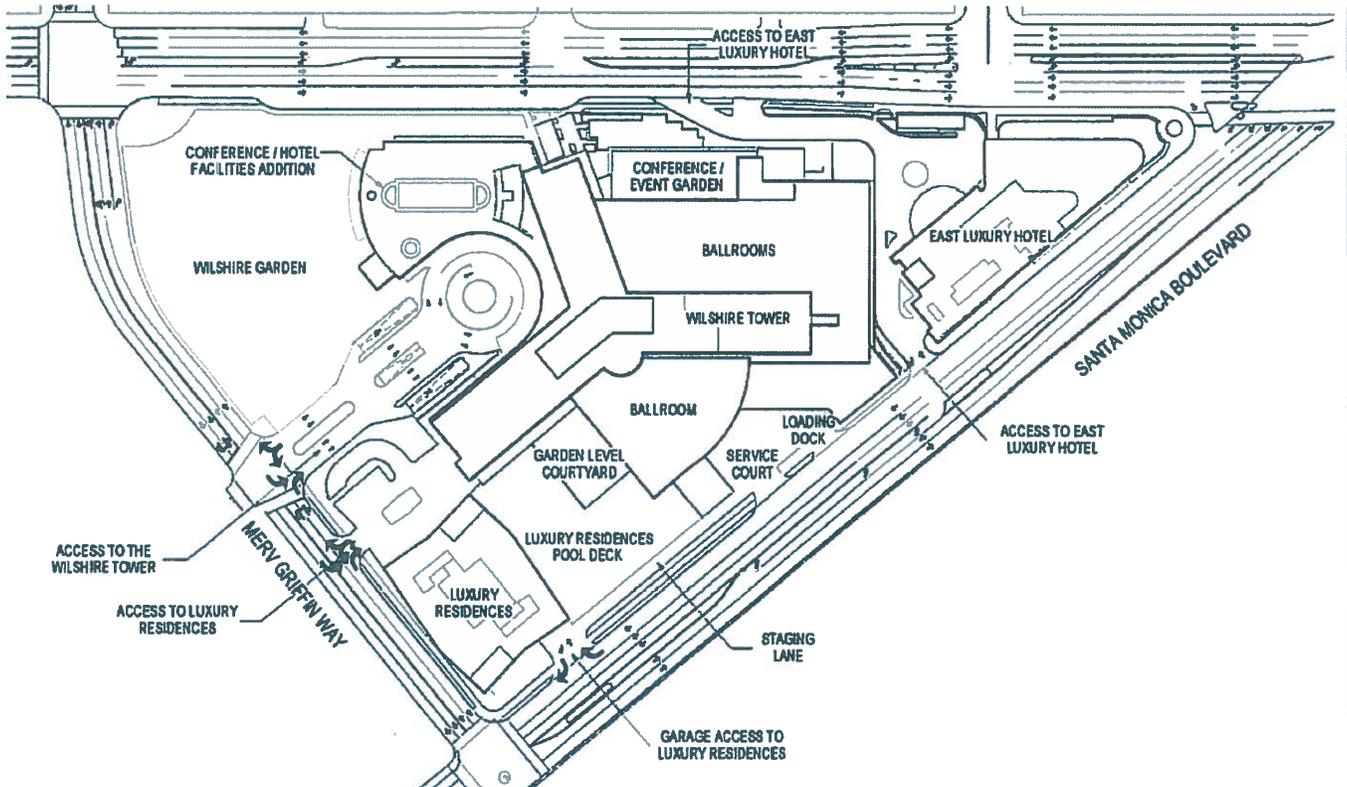
Access and Loading

Access - Consolidation of the residential units into one building simplifies the vehicular movements along Merv Griffin Way. Figure 2 illustrates the site access on Merv Griffin Way and Santa Monica Boulevard for the current and proposed Project.

One less driveway on Merv Griffin Way will reduce traffic conflicts turning onto and from Merv Griffin Way. Removing these vehicle conflicts benefits motorists traveling on the roadway as well as trips associated with The Beverly Hilton.



APPROVED ACCESS PLAN



PROPOSED ACCESS PLAN WITHOUT RESIDENCE A

3/2016

**FIGURE 2
THE BEVELY HILLS GARDEN AND OPEN SPACE INITIATIVE**


Overland Traffic Consultants, Inc.
 24325 Main Street #202, Santa Clarita, CA 91321
 (661)799-8423, OTC@overlandtraffic.com

Vehicular access to and from the new Residences Building will remain unchanged. There will be one full access driveway on Merv Griffin Way with access to the valet service and parking garage, and one right in / right out driveway on Santa Monica Boulevard with access to and from the parking garage.

The EIR analyzed all Project driveways and determined that adequate site distance would be provided at all driveways and on – site circulation impacts would be less than significant. No new driveways are proposed, therefore this determination is equally applicable to the proposed site plan.

Loading - Removing Building A will eliminate loading activities associated with Building A. Loading activities were proposed for the east side of Merv Griffin Way north of the Building A driveway. This on – street loading activity and truck traffic will no longer occur. Eliminating this on – street loading will benefit traffic flow.

Delivery vehicles for the Residences Building will occur in an off – street staging area adjacent to Santa Monica Boulevard. No new on – street loading areas are proposed for the Residences Building.

The EIR reviewed the delivery and service access and determined the site plan provides adequate accessibility and facilities for service and delivery vehicles. The EIR's conclusion is equally applicable to the proposed site plan.

Traffic Impact and Mitigation

Trips generated by the residential component of the Project are less than analyzed in the EIR and access points are simplified. As compared to the Project analyzed in the EIR, the only differences are the removal of the residential Building A access point, removal of the on – street loading and consolidation of the residential units.

Project trip distribution patterns and impacts will not change as a result of the consolidation of the two residential buildings. Residential trips will take the same routes to and from the Project site as identified and analyzed in the EIR.

Building A relocated trip volume is nominal, less than 1 vehicle every 5 minutes during the peak hour of traffic. The Project's total residential traffic is a maximum of 36 peak hour trips which can easily be served by the two access points proposed for the Residences Building.

The circulation plan in Figure 1 will provide adequate circulation and access to the Project and motorists traveling on Santa Monica Boulevard, Wilshire Boulevard and Merv Griffin Way.

Conclusions

The changes to the site plan do not change the conclusions reached in the City's EIR for the Project. The already approved Project as modified by The Beverly Hills Garden and Open Space Initiative will not result in any significant impacts to transportation, circulation or parking with the implementation of the adopted mitigation measures.

The mitigation measures adopted by the City of Beverly Hills to reduce traffic impacts associated with the construction of The Beverly Hilton Revitalization Project will adequately mitigate the modified residential component of the Project since no substantial changes are being made to the Project's trip generation or traffic flow.

Eliminating an access driveway and on – street loading area on Merv Griffin Way has the potential to improve traffic flow and accessibility on Merv Griffin Way.

With the implementation of already imposed mitigation, no unavoidable significant impacts to transportation, circulation and parking would occur as a result of Project's changes.

Please contact me if you have questions or comments.

Sincerely,



Jerry T Overland