2.0 EXECUTIVE SUMMARY

This section summarizes the information and analysis presented in the main body of the Environmental Impact Report (EIR). Section 15123 of the *California Environmental Quality Act (CEQA) Guidelines* requires an EIR to include a brief summary of the proposed project and its impacts in language as clear and simple as reasonably practical. In accordance with *CEQA Guidelines*, this summary presents information on the proposed Beverly Hilton Revitalization Project, the potential environmental effects of this project, and measures identified to mitigate these effects. A summary of the alternatives contained in the EIR is also provided.

2.1 PURPOSE

It is the intent of the Executive Summary to provide the reader with a clear and simple description of the proposed project and its potential environmental impacts. Section 15123 of the California Environmental Quality Act (CEQA) Guidelines *requires that the summary identify each significant effect, recommended mitigation measure(s), and alternatives that would minimize or avoid potential significant impacts (**Table 2.0-1, Summary Table of Project Impacts and Mitigation Measures**). The summary is also required to identify areas of controversy known to the lead agency, including issues raised by agencies and the public and issues to be resolved, including the choice among alternatives and whether or how to mitigate significant effects. This section focuses on the major areas of the proposed project that are important to decision makers and utilizes non-technical language to promote understanding.*

2.2 SITE LOCATION AND DESCRIPTION

The project site occupies the eastern end of the 17-acre "Robinsons-May/Beverly Hilton Triangle," considered the western gateway to Beverly Hills because of its location at the Beverly Hills-Los Angeles City boundary. The site is bounded by Wilshire Boulevard on the north, Santa Monica Boulevard on the south, the intersection of Wilshire and Santa Monica Boulevards on the east, and Merv Griffin Way, a private road connecting Wilshire and Santa Monica Boulevards, on the west. The site is 9 acres in size and is currently developed with The Beverly Hilton and ancillary hotel facilities including an executive conference center, hotel administrative offices, professional offices, a five-story parking structure with one subterranean level, retail uses, hotel restaurants, and the former Trader Vic's Restaurant.

2.3 PROJECT DESCRIPTION

The proposed Beverly Hilton Revitalization Plan (project) would redevelop and reconfigure the property through the addition of 50 guestrooms to The Beverly Hilton as well as new hotel support, retail and

office facilities, a conference center, outdoor landscaped areas; a new five-star, 120-room Waldorf=Astoria Hotel; and 120 condominium units. Project implementation would remove the Palm Oasis Court (181 guestrooms) and Cabana/Lanai Rooms (36 guestrooms), while the Wilshire Tower and its 352 guestrooms would remain. There would be an overall net reduction of 47 hotel rooms on the site.

The following existing buildings and features on the hotel property would be demolished and/or removed by the proposed redevelopment:

- Palm/Oasis Court;
- Cabana/Lanai Rooms;
- 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 Offices, and Professional Offices, as well as retail uses and a portion of the Lobby Bar and Lobby area;
- Parking Structure;
- The former Trader Vic's Restaurant and adjacent surface parking lot; and
- Landscaping.

The following new components would be constructed as a part of the proposed project:

- Two new buildings containing a total of 90 condominium units (Residences A and B);
- A new building occupied by a new 120-room Waldorf=Astoria Hotel, a new restaurant, and 30 condominium units;
- New hotel wing containing a total of 50 Beverly Hilton rooms;
- New hotel retail and hotel office space (no net increase in square footage);
- New hotel conference center (no net increase in square footage);
- Reconstructed pool, pool deck, and cabanas;
- Two subterranean parking structures containing a total of 1,422 parking spaces (net increase of 604 spaces); and
- Landscaping and pedestrian amenities.

2.4 TOPICS OF KNOWN CONCERN

City of Beverly Hills Planning staff circulated a Notice of Preparation (NOP) between September 11, 2006 and October 12, 2006 in order to receive input from interested public agencies and private parties. A public scoping meeting to receive input on the contents of the Draft EIR was held on September 18, 2006. A copy of the NOP is provided in Appendix 1.0 of the Draft EIR. Copies of all written responses to the NOP are also presented in Appendix 1.0 of the Draft EIR.

Based on the NOP and comments received at the scoping hearing, this EIR addresses the following topics:

- Aesthetics
- Air Quality
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Transportation/Traffic/Parking and Circulation
- Utilities and Service Systems

2.5 ALTERNATIVES

The following project alternatives were identified to reduce or avoid the severity of potentially significant impacts identified through the environmental analysis included in **Section 4.0, Environmental Impact Analysis,** of the Draft EIR.

- **Alternative 1 – No Project Alternative.** Under the No Project Alternative, The Beverly Hilton Revitalization Plan would not be implemented. The Beverly Hilton Hotel would remain in operation and could undergo routine improvements and minor remodels in the future and office uses, but the hotel property would not be redeveloped as proposed under the project.

- **Alternative 2 – Code-Compliant Office/Retail Alternative.** This alternative would evaluate redevelopment of The Beverly Hilton Hotel property in compliance with the current City of Beverly Hills Municipal Code commercial (C-3) zoning designation for the property. Redevelopment of the site would, accordingly, be restricted to mixed office and retail uses, the maximum permitted floor:area ratio (FAR) of 2:1, a 45-foot/three-story height restriction, and compliance with other applicable development standards. Accordingly, under this alternative no residential uses would be developed. The number of new hotel rooms planned would be fewer than under the proposed project (131) but would be distributed across the site in buildings no more than three stories and 45 feet in height. The hotel brand and class could vary under this alternative, and a Waldorf=Astoria Hotel may not be developed. A restaurant would still be developed as under the proposed project, and hotel retail and hotel office space would be developed as under the proposed project. This

alternative would introduce new office and retail space in addition to hotel-related uses, and would substantially reduce the area of landscaping and gardens associated with the proposed project.

- **Alternative 3 – Reduced Density Alternative.** Under this Alternative, the residential component only of the proposed project would be reduced by 30 percent, from 120 to 85 condominium units. The number of hotel rooms proposed would likewise be reduced 30 percent from 170 guestrooms to 119 guestrooms. Residential building heights, the height of the Wilshire Boulevard building proposed to house the new Beverly Hilton hotel rooms and/or the Waldorf=Astoria building, and the number of parking spaces on site would be reduced correspondingly. Under this alternative, the new hotel may not be a Waldorf=Astoria hotel.

- **Alternative 4 – Modified Residential Building Height Alternative.** This alternative would be similar to the proposed project, including the same number of Beverly Hilton and Waldorf=Astoria hotel rooms, the same ancillary uses including new hotel retail and hotel office space and a new executive conference center, and the same number of residential units. The site would be developed to the same FAR as under the proposed project. However, the maximum height of the Residence A building, in the northwest corner of the project site near the intersection of Merv Griffin Way and Wilshire Boulevard, would be reduced from 150 feet and 13 stories to 112 feet and 10 stories. The height of the Residence B Building, in the southwest corner of the project site, would be increased from 150 feet and 13 stories to 184 feet and 16 stories. The buildings would be constructed in the same locations as under the proposed project.

- **Alternative 5 – Preservation Alternative.** Under this alternative, the Wilshire Boulevard frontage of the hotel, also known as the Wilshire Edge, would be retained and adaptively reused in conjunction with future hotel operations. The Wilshire Edge is considered the second most architecturally significant feature on the property, after the Wilshire Tower, and extends from the intersection of Wilshire Boulevard and Santa Monica Boulevard on the east to Merv Griffin Way on the west. It presently houses the former Trader Vic's Restaurant, hotel support and office space, the Wilshire Boulevard hotel entrance/drop-off area, and the Executive Conference Center. Under this alternative, the proposed improvements to Beverly Hilton retail, extensive landscape improvements, conference center, and additional Beverly Hilton hotel rooms would not be built. Proposed additional lanes on Wilshire Boulevard would not be included, although some of the proposed roadway improvements for Santa Monica Boulevard would be implemented under this alternative. As a result of the preservation of the Wilshire Edge, the new hotel would be relocated to the southwest and Residence A would be moved to the south. There would be 80 fewer hotel rooms, 6 fewer condominium units and 232 fewer parking spaces built under this alternative. Under this alternative, the new hotel may not be a Waldorf=Astoria hotel.

2.6 SUMMARY OF ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

A summary of the environmental impacts associated with implementation of the proposed project, as well as mitigation measures included to avoid or lessen the severity of potentially significant impacts, is provided in **Table 2.0-1**, below.

Table 2.0-1
Summary Table of Project Impacts and Mitigation Measures

Project Impacts	Mitigation Measures	Significance After Mitigation
AESTHETICS		
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 Impacts	Mitigation Measures	Significance After Mitigation
AESTHETICS (continued)		
Views (continued)		
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.	None 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.	None 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

Project Impacts	Mitigation Measures	Significance After Mitigation
AESTHETICS (continued)		
Shade and Shadow		
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. 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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
AESTHETICS (continued)		
Shade and Shadow (continued)		
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 Projects 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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
AESTHETICS (continued)		
Shade and Shadow (continued)		
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. 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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
AIR QUALITY		
Short-Term Construction Impacts		
During the demolition, grading and excavation, and building construction phases of project construction, oxides of nitrogen emissions (NOx) 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.	**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 per CARB regulations. **AQ-2** The Contractor shall ensure that the use of all construction equipment is suspended during first-stage smog alerts. **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. **AQ-4** The Contractor shall maintain construction equipment by conducting regular tune-ups according to the manufacturers' recommendations. **AQ-5** The Contractor shall promote the use of electric welders to avoid emissions from gas or diesel welders, to the extent feasible. **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.	Significant and Unavoidable

Project Impacts	Mitigation Measures	Significance After Mitigation
AIR QUALITY (continued)		
Short-Term Construction Impacts (continued)		
	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. **AQ-8** The Contractor shall ensure that traffic speeds on all unpaved roads are reduced to 15 miles per hour or less. **AQ-9** The Contractor shall ensure that the project site is watered at least three times daily during dry weather. **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. **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). **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.	

Project Impacts	Mitigation Measures	Significance After Mitigation
AIR QUALITY (continued)		
Short-Term Construction Impacts (continued)		
	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.	

Project Impacts	Mitigation Measures	Significance After Mitigation
AIR QUALITY (continued)		
Localized Significance Thresholds (LST) – Construction		
The Localized Significance Threshold (LST) analysis shows that maximum 24-hour PM_{10} (particulate matter less than 10 microns in diameter) and $PM_{2.5}$ (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), PM_{10}, or $PM_{2.5}$. Operational air quality impacts would be less than significant.	None required.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
AIR QUALITY (continued)		
Localized Carbon Monoxide Emissions – Operations (continued)		
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.	None 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.	None 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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
AIR QUALITY (continued)		
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.	None required.	Less Than Significant
Cumulative Impacts		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
AIR QUALITY (continued)		
Cumulative Impacts		
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, PM_{10}, and $PM_{2.5}$. Because the Basin is nonattainment for ozone (NOx is a precursor to ozone), PM_{10}, and $PM_{2.5}$, 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.	None required.	Significant and Unavoidable
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.	See **Table 4.2-12**.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
CULTURAL RESOURCES		
Historical Resources		
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.	**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.	Significant and Unavoidable
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.	See mitigation measure **CR-1**. No additional feasible mitigation measure is available.	Significant and Unavoidable

Project Impacts	Mitigation Measures	Significance After Mitigation
CULTURAL RESOURCES (continued)		
Historical Resources (continued)		
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.	See mitigation measure **CR-1.**	Significant and Unavoidable
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.	**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.	Less Than Significant
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.	**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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
CULTURAL RESOURCES (continued)		
Archaeological Resources		
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.	**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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
CULTURAL RESOURCES (continued)		
Archaeological Resources (continued)		
	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.	

Project Impacts	Mitigation Measures		Significance After Mitigation
CULTURAL RESOURCES (continued)			
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

Project Impacts	Mitigation Measures	Significance After Mitigation
CULTURAL RESOURCES (continued)		
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.	**CR-1** Components of The Beverly Hilton to be demolished shall be photographed with large-format black-and-white photography, and a written report prepared, 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. **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 applicant, the City of Beverly Hills, and an architectural historian qualified under the Secretary of the Interior's Standards. **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, in consultation with the project proponents, the City of Beverly Hills, and an architectural historian qualified under the Secretary of the Interior's Standards.	Significant and Unavoidable

Project Impacts	Mitigation Measures	Significance After Mitigation
GEOLOGY AND SOILS		
Surface Rupture		
The project site is not located within an Alquist-Priolo Earthquake Zone. The closest Alquist-Priolo Earthquake Fault Zone is approximately 2.93.4 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

Project Impacts	Mitigation Measures	Significance After Mitigation
GEOLOGY AND SOILS (continued)		
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 mitigation measure **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 mitigation measure **GEO-1.**	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
GEOLOGY AND SOILS (continued)		
Cumulative Impacts		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
HAZARDS AND HAZARDOUS MATERIALS		
Asbestos – Lead Paint – Mold – PCBs		
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.	**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. **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. **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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
HAZARDS AND HAZARDOUS MATERIALS (continued)		
Hazardous Materials within 0.25 Mile of a School		
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.	**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. **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. **HAZ-6** All personnel workers potentially exposed to lead-containing materials shall be trained and protected in accordance with federal OSHA regulations. **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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
HAZARDS AND HAZARDOUS MATERIALS (continued)		
Listed Hazardous Materials Sites		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
HAZARDS AND HAZARDOUS MATERIALS (continued)		
Cumulative Impacts		
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.	**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. **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. **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. **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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
HAZARDS AND HAZARDOUS MATERIALS (continued)		
Cumulative Impacts (continued)		
	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. **HAZ-6** All personnel workers potentially exposed to lead-containing materials shall be trained and protected in accordance with federal OSHA regulations. **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.	

Project Impacts	Mitigation Measures	Significance After Mitigation
HYDROLOGY AND WATER QUALITY		
Surface Water Quality – Construction		
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.	**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. **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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
HYDROLOGY AND WATER QUALITY (continued)		
Surface Water Quality – Operations		
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.	See mitigation measures **HYDRO-1** and **HYDRO-2**.	Less Than Significant
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.	See mitigation measures **HYDRO-1** and **HYDRO-2**.	Less Than Significant
Groundwater Depletion		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
HYDROLOGY AND WATER QUALITY (continued)		
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

Project Impacts	Mitigation Measures	Significance After Mitigation
HYDROLOGY AND WATER QUALITY (continued)		
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

Project Impacts	Mitigation Measures	Significance After Mitigation
LAND USE AND PLANNING		
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. 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.	No feasible mitigation measures are available.	Significant and Unavoidable.
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.	See mitigation measure **CR-1**. No additional feasible mitigation measure is available.	Significant and Unavoidable
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.	No feasible mitigation is available.	Significant and Unavoidable

Project Impacts	Mitigation Measures	Significance After Mitigation
LAND USE AND PLANNING (continued)		
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.	See mitigation measure **CR-1**. No additional feasible mitigation measure is available.	Significant and Unavoidable
NOISE		
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.	**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: • 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.**	Significant and Unavoidable

Project Impacts	Mitigation Measures	Significance After Mitigation
NOISE (continued)		
	NOISE-1 (continued) 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-inch 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 Community Development Director. • 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. • 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.	

Project Impacts	Mitigation Measures	Significance After Mitigation
NOISE (continued)		
	NOISE-1 (continued) • 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 Impacts	Mitigation Measures	Significance After Mitigation
NOISE (continued)		
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
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
NOISE (continued)		
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.	**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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
NOISE (continued)		
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.	**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.	Less Than Significant
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

Project Impacts	Mitigation Measures	Significance After Mitigation
NOISE (continued)		
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: • 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

Project Impacts	Mitigation Measures	Significance After Mitigation
POPULATION AND HOUSING		
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
Fire Protection and Emergency Services		
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.	**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.	Less Than Significant

Project Impacts	Mitigation Measures		Significance After Mitigation
PUBLIC SERVICES (continued)			
Fire Protection and Emergency Services (continued)			
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.	**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 proposed project.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
PUBLIC SERVICES (continued)		
Cumulative Impacts		
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.	None required.	Less Than Significant
Police Protection		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
PUBLIC SERVICES (continued)		
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

Project Impacts	Mitigation Measures	Significance After Mitigation
PUBLIC SERVICES (continued)		
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

Project Impacts	Mitigation Measures	Significance After Mitigation
PUBLIC SERVICES (continued)		
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

Project Impacts	Mitigation Measures	Significance After Mitigation
PUBLIC SERVICES (continued)		
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

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION		
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. 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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	**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. **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. **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. **TRAF-4** The Developer and Environmental Monitor shall each provide monthly project updates to the City, unless otherwise warranted due to resident complaints.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
Construction Traffic (continued)	**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: • 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;	

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
Construction Traffic (continued)	**TRAF-5** (continued) • 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 Transit 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.	

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
Construction Traffic (continued)	**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: • 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;	

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
Construction Traffic (continued)	**TRAF-6** (continued) • 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.	
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.	See mitigation measures **TRAF-1** through **TRAF 6**.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant
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.	See mitigation measures **TRAF-1** through **TRAF 6**.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	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.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant
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. 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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
Off-Site Intersection Collision Risk 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.	None required.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
As stated above, the following five intersections have a reported accident rate exceeding the statewide average: ◦ 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. 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.	None required.	Less Than Significant
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
TRANSPORTATION, TRAFFIC, PARKING AND CIRCULATION (continued)		
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.	**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: • 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.	Less Than Significant
Cumulative Operation Impacts Cumulative impacts associated with the proposed project and related projects would be less than significant.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
UTILITIES AND SERVICE SYSTEMS		
Water		
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.	None required.	Less Than Significant
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.	**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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
UTILITIES AND SERVICE SYSTEMS (continued)		
Cumulative Impacts		
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.	None required.	Less Than Significant
Wastewater		
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.	**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.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
UTILITIES AND SERVICE SYSTEMS (continued)		
Wastewater		
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.	None required.	Less Than Significant
Cumulative Impacts		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
UTILITIES AND SERVICE SYSTEMS (continued)		
Solid Waste		
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. 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.	None required.	Less Than Significant
Cumulative Impacts		
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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
UTILITIES AND SERVICE SYSTEMS (continued)		
Energy		
Electricity 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.	None required.	Less Than Significant
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.	**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.	

Project Impacts	Mitigation Measures	Significance After Mitigation
UTILITIES AND SERVICE SYSTEMS (continued)		
Electricity Cumulative Impacts		
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.	None required.	Less Than Significant
Natural Gas 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.	None required.	Less Than Significant

Project Impacts	Mitigation Measures	Significance After Mitigation
UTILITIES AND SERVICE SYSTEMS (continued)		
Electricity Cumulative Impacts (continued)		
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.	**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.	Less Than Significant
Natural Gas Cumulative Impacts		
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.	None required.	Less Than Significant