

**Attachment 4**

**Exhibit C**



2008-2014 Housing Element and  
2010-2015 Hazard Mitigation Action Plan

City of Beverly Hills  
Negative Declaration and Environmental Initial Study

October 2011

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

<b>SCH #</b>
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**Project Title:** 2008-2014 Housing Element and 2010-2015 Hazard Mitigation Action Plan

Lead Agency: Beverly Hills Contact Person: Peter Noonan  
 Mailing Address: 455 North Rexford Drive Phone: 310.285.1127  
 City: Beverly Hills Zip: 90210 County: Los Angeles

**Project Location:** County: Los Angeles City/Nearest Community: Beverly Hills  
 Cross Streets: Within entire city jurisdiction Zip Code: 90210  
 Longitude/Latitude (degrees, minutes and seconds): 34 ° 4 ' 23 " N / 118 ° 23 ' 58 " W Total Acres: 2,791  
 Assessor's Parcel No.: NA Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_  
 Within 2 Miles: State Hwy #: 2 Waterways: \_\_\_\_\_  
 Airports: \_\_\_\_\_ Railways: \_\_\_\_\_ Schools: Beverly Hills USD

**Document Type:**

CEQA:  NOP  Draft EIR NEPA:  NOI Other:  Joint Document  
 Early Cons  Supplement/Subsequent EIR  EA  Final Document  
 Neg Dec (Prior SCH No.) \_\_\_\_\_  Draft EIS  Other: \_\_\_\_\_  
 Mit Neg Dec Other: \_\_\_\_\_  FONSI \_\_\_\_\_

**Local Action Type:**

General Plan Update  Specific Plan  Rezone  Annexation  
 General Plan Amendment  Master Plan  Prezone  Redevelopment  
 General Plan Element  Planned Unit Development  Use Permit  Coastal Permit  
 Community Plan  Site Plan  Land Division (Subdivision, etc.)  Other: Hazard Mitigation

**Development Type:**

Residential: Units \_\_\_\_\_ Acres \_\_\_\_\_  
 Office: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Transportation: Type \_\_\_\_\_  
 Commercial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Mining: Mineral \_\_\_\_\_  
 Industrial: Sq.ft. \_\_\_\_\_ Acres \_\_\_\_\_ Employees \_\_\_\_\_  Power: Type \_\_\_\_\_ MW \_\_\_\_\_  
 Educational: \_\_\_\_\_  Waste Treatment: Type \_\_\_\_\_ MGD \_\_\_\_\_  
 Recreational: \_\_\_\_\_  Hazardous Waste: Type \_\_\_\_\_  
 Water Facilities: Type \_\_\_\_\_ MGD \_\_\_\_\_  Other: No specific development proposed

**Project Issues Discussed in Document:**

Aesthetic/Visual  Fiscal  Recreation/Parks  Vegetation  
 Agricultural Land  Flood Plain/Flooding  Schools/Universities  Water Quality  
 Air Quality  Forest Land/Fire Hazard  Septic Systems  Water Supply/Groundwater  
 Archeological/Historical  Geologic/Seismic  Sewer Capacity  Wetland/Riparian  
 Biological Resources  Minerals  Soil Erosion/Compaction/Grading  Growth Inducement  
 Coastal Zone  Noise  Solid Waste  Land Use  
 Drainage/Absorption  Population/Housing Balance  Toxic/Hazardous  Cumulative Effects  
 Economic/Jobs  Public Services/Facilities  Traffic/Circulation  Other: \_\_\_\_\_

**Present Land Use/Zoning/General Plan Designation:**

Includes all land uses/zoning/General Plan designations within the City of Beverly Hills

**Project Description:** *(please use a separate page if necessary)*  
 See attached sheet.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

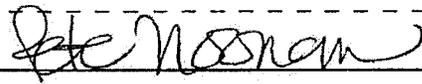
<input checked="" type="checkbox"/> Air Resources Board	<input checked="" type="checkbox"/> Office of Emergency Services
<input type="checkbox"/> Boating & Waterways, Department of	<input checked="" type="checkbox"/> Office of Historic Preservation
<input checked="" type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Office of Public School Construction
<input checked="" type="checkbox"/> Caltrans District # <u>7</u>	<input checked="" type="checkbox"/> Parks & Recreation, Department of
<input type="checkbox"/> Caltrans Division of Aeronautics	<input type="checkbox"/> Pesticide Regulation, Department of
<input type="checkbox"/> Caltrans Planning	<input checked="" type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Central Valley Flood Protection Board	<input checked="" type="checkbox"/> Regional WQCB # <u>4</u>
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> Resources Agency
<input type="checkbox"/> Coastal Commission	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input checked="" type="checkbox"/> Conservation, Department of	<input type="checkbox"/> San Joaquin River Conservancy
<input type="checkbox"/> Corrections, Department of	<input checked="" type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> State Lands Commission
<input checked="" type="checkbox"/> Education, Department of	<input type="checkbox"/> SWRCB: Clean Water Grants
<input checked="" type="checkbox"/> Energy Commission	<input checked="" type="checkbox"/> SWRCB: Water Quality
<input checked="" type="checkbox"/> Fish & Game Region # <u>5</u>	<input type="checkbox"/> SWRCB: Water Rights
<input type="checkbox"/> Food & Agriculture, Department of	<input type="checkbox"/> Tahoe Regional Planning Agency
<input checked="" type="checkbox"/> Forestry and Fire Protection, Department of	<input checked="" type="checkbox"/> Toxic Substances Control, Department of
<input type="checkbox"/> General Services, Department of	<input checked="" type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> Health Services, Department of	Other: _____
<input checked="" type="checkbox"/> Housing & Community Development	Other: _____
<input checked="" type="checkbox"/> Integrated Waste Management Board	
<input checked="" type="checkbox"/> Native American Heritage Commission	

### Local Public Review Period (to be filled in by lead agency)

Starting Date October 4, 2011 Ending Date November 3, 2011

### Lead Agency (Complete if applicable):

Consulting Firm: AECOM Applicant: City of Beverly Hills  
Address: 1420 Kettner Boulevard, Suite 500 Address: 455 North Rexford Drive  
City/State/Zip: San Diego, CA 92101 City/State/Zip: Beverly Hills, CA 90210  
Contact: Yara Fisher Phone: 310.285.1127  
Phone: 619-233-1454

Signature of Lead Agency Representative:  Date: 10/03/2011

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

## **Project Description**

The project includes the adoption and implementation of two City of Beverly Hills (City) planning documents. The first is the 2008–2014 Housing Element of the City of Beverly Hills General Plan (General Plan). The second is the 2010–2015 Hazard Mitigation Action Plan (HMAP). Neither of the updated plans includes modifications to development patterns or changes in the pattern of land uses established in the General Plan. These plan updates also do not propose or contemplate specific development projects; however, goals and policies of the plans may result in future actions that could have environmental affects. The 2008–2014 Housing Element is attached as Appendix A and the HMAP is attached as Appendix B. Both plans are summarized below.

### **2008–2014 Housing Element**

The 2008–2014 Housing Element is an update of the City’s 1998–2005 Housing Element of the General Plan. The Housing Element is a guide for expanding housing opportunities and services for all household types and income groups, and policy guidance for local decision–making related to housing. The City of Beverly Hills Housing Element details programs that the City intends to implement as a means of encouraging more affordably priced housing in the City and ensuring that the community’s housing needs are met. The updated Housing Element is consistent with the policies and programs set forth in the adopted General Plan.

State Housing Element law requires each city and county to identify and analyze existing and projected housing needs within their jurisdiction and to prepare goals, policies, and programs to encourage the development, improvement, and preservation of housing (Government Code Sections 65580–65589). Each city and county is required to develop local housing programs to meet its “fair share” of existing and future housing needs for all community members, as determined by the jurisdiction’s Council of Governments. The Regional Housing Needs Assessment (RHNA) is the minimum number of “adequate sites” for housing units each community is required to provide through zoning, and is one of the primary threshold criteria necessary to achieve approval from the State Department of Housing and Community Development. In total, per RHNA requirements, the City is required to plan for the creation of 554 new housing units during the 2006–2014 planning period, including 146 very–low–income units (half, or 73, units of which are for extremely low–income households), 113 low–income units, 117 moderate income units, and 178 above moderate–income units.

The City has developed the following numeric objectives for housing production, housing rehabilitation, and housing preservation based on the policies and programs set forth in the Housing Element, as shown in Table 1. The City’s quantified housing construction objective meets the RHNA allocation of 554 units, including carry–over from the prior planning period. The City will work toward meeting its RHNA through development of entitled projects and new units on multi–family infill sites, development of second units, and support of affordable housing through a

new Housing Trust Fund. No General Plan land use designation or zoning district changes are necessary to meet the RHNA requirements. The ability to achieve the RHNA allocation of 554 units can be met within the existing development capacity identified in the General Plan.

**Table 1  
2008–2014 Summary of Quantified Housing Objectives**

<b>Income Group</b>	<b>New Construction</b>	<b>Rehabilitation</b>	<b>Conservation</b>
Extremely Low	73	-	75
Very Low	73	110	75
Low	113	110	-
Moderate	117	-	-
Above Moderate	178	-	-
<b>Total</b>	<b>554</b>	<b>220</b>	<b>150</b>

As directed by the updated Housing Element, the City would continue to provide sites for a mix of multi-family housing, supported by a variety of programs to enhance affordability to accommodate its RHNA and contribute toward addressing the growing demand for housing in the Southern California region.

The focus of this analysis is on those implementation programs that could change development standards from current standards and practices of the existing Housing Element or design review process. The implementation programs that could directly remove barriers to, or encourage the construction or redevelopment of, additional residential units within the City include:

- Imp 10.1 Density Bonus
- Imp 10.4 Second Units
- Imp 10.7 Partnerships with Affordable Housing Developers
- Imp 11.2 Senior Housing Development
- Imp 12.1 Zoning Text Amendments for Special Needs Housing
- Imp 12.2 Adjust Development Standards
- Imp 12.3 Reduced Fees for Affordable Housing

**2010–2015 Hazard Mitigation Action Plan**

The HMAP provides a required 5-year update to the existing plan adopted in 2004. Hazard mitigation, also known as prevention before the occurrence of a disaster, is now considered to be the first step in preparing for natural and human-made emergencies. The mission of the HMAP is to promote sound public policy and programs designed to protect the public, critical facilities, infrastructure, private and public property, and the environment from natural and human-made hazards. The HMAP provides a list of activities that may assist the City in reducing risk and preventing loss from future hazard events. The strategies address multi-hazard issues, as well as activities for earthquakes, wildfires, terrorism, earth movements, flooding, and wind

storms. By preparing this plan, the City is eligible for federal mitigation funding after disasters and can apply for mitigation grants before disasters strike. The mitigation strategies for each of the hazard issues are briefly summarized below.

Earthquake: Continue to require upgrades of existing unreinforced masonry buildings, offer assistance programs for older adults who need to seismically retrofit their homes, and establish more seismic data collection sampling stations within Beverly Hills.

Fire: Update existing City codes; increase water pressure and access to water in Zone 9 near Coldwater Canyon; educate residents regarding potential fire hazards of wood roofs; educate the community about “firewise” and “waterwise” plants; develop public education materials regarding vegetation management around homes; revise the zoning code to reflect General Plan permitted uses and development standards; design driveways and roadways to maintain fire department access; develop and educate residents about a City-wide evacuation route; and evaluate and implement recommendations of the Firewise Communities Program.

Terrorism: Conduct analysis of critical infrastructure areas and how each area interfaces with cyber or physical components if attacked and possible cascade affects; obtain a high-level security system to prevent cyber attacks on City systems and databases.

Flood: Update the City’s Urban Water Master Plan and Capital Improvement Program, adopt state-of-the-art water monitoring systems, and continue to implement existing flood mitigation activities and programs; remove the locally designated flood ordinance.

Landslide: Conduct geotechnical investigation to update landslide hazard maps.

Windstorm: Continue to use the Street Tree Master Plan as a mechanism to eliminate structurally defective trees to minimize potential danger.

Multi-Hazard: Study cost-effective ways to offer a Citizen Emergency Response Team to the community; conduct periodic fire emergency management exercises with City personnel and surrounding jurisdictions; continue to update the City’s building and fire codes to reflect the highest and best available standards for seismic design; continue to coordinate with local jurisdictions and agencies in carrying out inspections, emergency response, enforcement, and site mitigation oversight of hazardous materials and waste; ensure joint effort and responsibility in emergency disaster management; educate the community on how to find information during a disaster; conduct disaster preparedness for all City commissions to be prepared to assist the City during a hazard event; conduct outreach to all City residents on how to properly store and secure hazardous materials; identify all possible medical facilities in the City that are capable of providing medical services during a hazard event.



1. **Project Title:** 2008–2014 Housing Element and 2010–2015 Hazard Mitigation Action Plan
2. **Lead Agency Name and Address:** City of Beverly Hills, 455 North Rexford Drive, Beverly Hills, CA 90210
3. **Contact Person and Phone Number:** Peter Noonan, AICP, 310–285–1127
4. **Project Location:** City of Beverly Hills, County of Los Angeles, California
5. **Project Sponsor's Name and Address:** City of Beverly Hills, 455 North Rexford Drive, Beverly Hills, CA 90210
6. **General Plan Designation:** The entirety of the land use designations in the City of Beverly Hills General Plan Land Use Map, which remain unchanged as a part of this project.
7. **Zoning:** The entirety of the zoning districts as set forth on the City of Beverly Hills Zoning Map, which remain unchanged as a part of this project.
8. **Project Description:**

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Imp 10.1 Density Bonus

Modify the residential density bonus ordinance and promote the use of density bonus incentives through the City’s Affordable Housing Brochure.



#### Imp 10.4 Second Units

To further encourage the provision of second units, the Housing Element includes a program to evaluate modifications to its second unit ordinance:

- Greater flexibility in second unit standards in R-1 zones south of Santa Monica Boulevard
- Allowances for larger sized second units, of up to 1,000 square feet by right to reduce processing times and facilitate the provision of second units with bedrooms
- For second units built above a garage, allowance for an increase in the permitted height up to the height of the primary residence
- Allowances for reduced setback requirements where privacy is not compromised

#### Imp 10.7 Partnerships with Affordable Housing Developers

The City will initiate a partnership and continue to work with non-profit developers to assist in the development of housing affordable to extremely low and lower income senior households. The City will select a non-profit developer to develop an affordable senior housing project, and will support this effort through leveraging local Housing Trust Funds, assisting in the application for state and federal financial resources, facilitating project entitlement, and providing a package of incentives such as fee deferrals and relaxed development standards.

#### Imp 11.2 Senior Housing Development

The City intends to issue a Request for Qualifications (RFQ) and select a developer to build an affordable senior project (Imp 10.7), and will provide the following incentives to facilitate development:

- Flexible development standards
- Density bonuses
- City support in affordable housing funding applications
- Deferral/Reduction in development fees and waiver of any potential Conditional Use Permit fee
- Direct financial assistance through the Housing Trust Fund
- Project entitlement assistance

#### Imp 12.1 Zoning Text Amendments for Special Needs Housing

Amend the zoning code to make explicit provisions for a variety of special needs housing, including community care facilities with six or fewer occupants, transitional housing, supportive housing, and emergency shelters.

#### Imp 12.2 Adjust Development Standards

Certain development standards may have the effect of constraining the provision of certain housing types. The City will commit to reducing its minimum lot size requirements. The City will implement revisions to include, but not limited to, an evaluation of the following:

- Replacing the current density calculation for multi-family projects in the zoning code with a maximum floor area ratio
- Modifying development standards for single-lot projects
- Allowing greater flexibility in the type and location of multi-family parking



- Allowing the same number of units to be rebuilt on properties that have more units than currently would be allowed
- Providing additional incentives for workforce housing over and above those contained in the provisions of the State Density Bonus

#### Imp 12.3 Reduced Fees for Affordable Housing

The City will evaluate the economic benefit of providing waivers or reductions of certain fees for developments containing very low-, low-, and moderate-income housing units.

### **2010–2015 Hazard Mitigation Action Plan**

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**Flood:** Update the City’s Urban Waster Master Plan and Capital Improvement Program, adopt state-of-the-art water monitoring systems, and continue to implement existing flood mitigation activities and programs; remove the locally designated flood ordinance.



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9. **Location, Plan Area, and Regional Access:** The City of Beverly Hills is surrounded by the City of West Hollywood to the northeast and the City of Los Angeles to the south, west, and north.

**Location.** The City is located in Los Angeles County, approximately 10 miles west of downtown Los Angeles and 6 miles east of the Pacific Ocean, as shown in Figure 1. The City extends into the southern foothills of the Santa Monica Mountains, which form the City's northern boundary. Surrounding communities in the City of Los Angeles are Bel Air and Westwood to the west, Hollywood and the Fairfax district to the east, and West Los Angeles and Century City to the southwest and south. The City of West Hollywood is located adjacent to the northeast.

**Planning Area.** The City covers 3,656 square acres or 5.7 square miles. The City's boundaries are shown in Figure 2. Beverly Hills is a built-out urban community with a central commercial core, civic center, established residential neighborhoods, parks, schools, and other community-serving facilities, and a well-developed public service and utility infrastructure. Opportunities for additional growth and development are limited and primarily confined to the redevelopment of existing developed properties.

**Regional Access.** Regional access is provided primarily by three freeways and four major arterials.

**Freeways:** The Santa Monica Freeway (Interstate 10 [I-10]) is located approximately 2 miles south of the City and runs east/west. The San Diego Freeway (Interstate 405 [I-405]) to the west and the Hollywood Freeway (Interstate 101 [I-101]) to the east of the City both run north/south. I-10 intersects I-405 approximately 2 miles west of the City.

**Major Arterials:** Wilshire Boulevard, North Santa Monica Boulevard, and Olympic Boulevard are major east/west arterials that link Beverly Hills to the coast, the Los Angeles Westside to the west, and the



Miracle Mile and downtown Los Angeles on the east. Coldwater and Benedict Canyons provide access to the City from the San Fernando Valley to the north.

10. **Environmental Setting:** The City is located in the middle of Los Angeles County and is a well established, urbanized community. The areas surrounding the City are generally highly urbanized. There is minimal natural area remaining and most of the City is developed with impervious urban surfaces. The majority of vegetation in the City is maintained landscaping. Generally, to construct a new building in the City, an existing structure must first be removed.

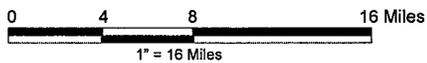
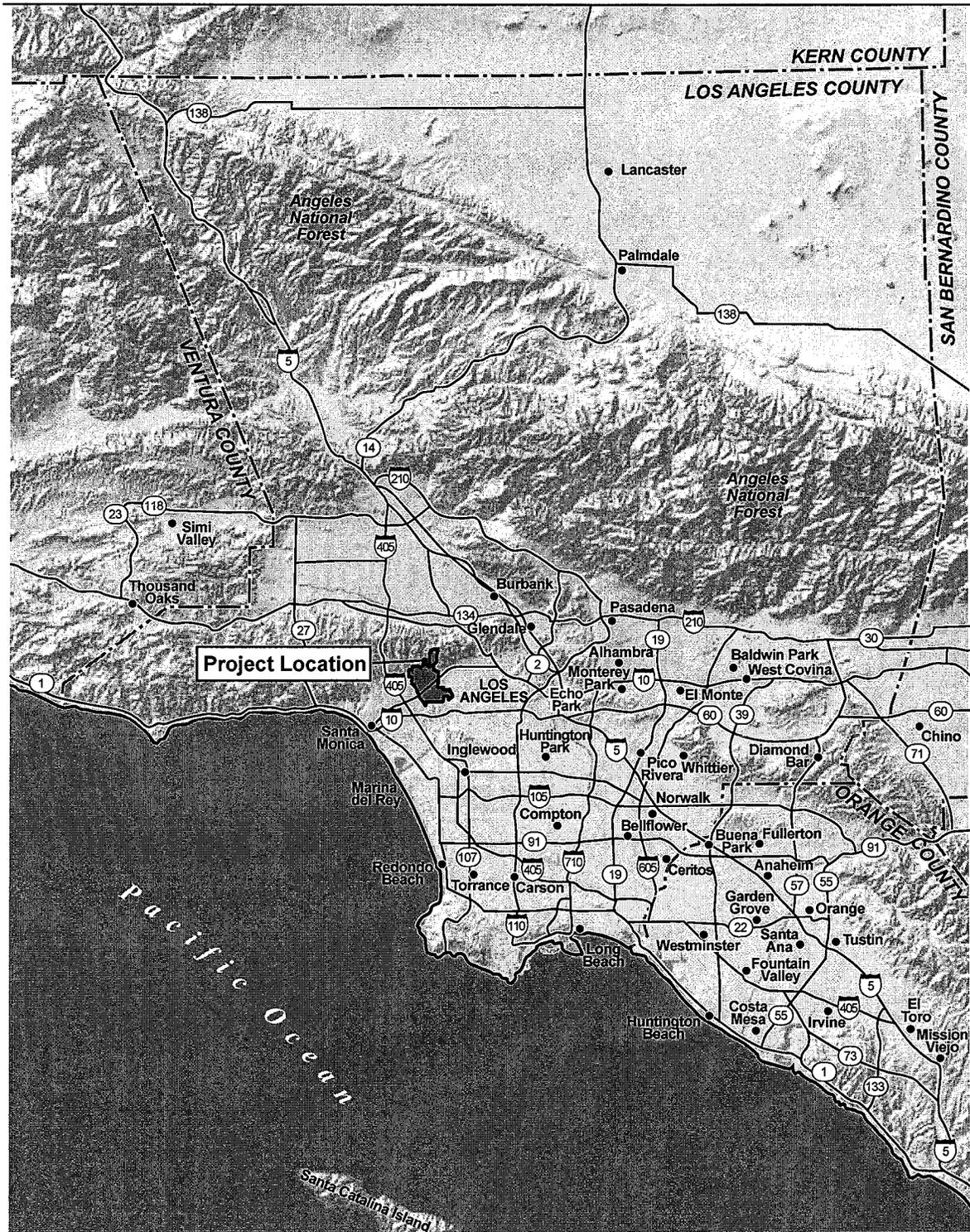
The City has more than 34,200 residents with a daytime population estimated to be 150,000 to 200,000. Approximately 90% of the City is zoned for residential use. Police, fire, water treatment, refuse collection, and other services are provided directly by the City. Beverly Hills has its own school district. Private automobiles are the dominant means of transportation in the region and within the City. Because the City is located in the middle of a large metropolitan area, a large number of buses and cars travel through the City each day on their way to bordering cities and regions.

The City is at the southern edge of the Santa Monica Mountain range and approximately 6 miles east of the Pacific Ocean. The City is characterized by rugged hillside areas to the north with relatively flat areas in the remainder of the City. The City is located within a region that is subject to high seismic activity. There are several active faults in or near the City. The City is located within the South Coast Air Basin and is situated within the Ballona Creek Watershed. Within the City, there are approximately 77 acres of developed parkland and close to 100 acres of open space area.

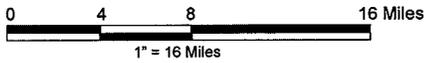
11. **Other Public Agencies whose Review/Approval Is Required:** (e.g., permits, financing approval, or participation agreement)

Approving Agency: The City of Beverly Hills is the approving agency. The State Department of Housing and Community Development is responsible for certification of the Housing Element. The Federal Emergency Management Agency (FEMA) has already approved the HMAP. No other agency approvals are required. The City is responsible for all future permits and approvals.

Reviewing Agencies: The following agencies will be sent a copy of this document at the commencement of the review period as a courtesy in the event they would like to provide comments. California Air Resources Board; California Highway Patrol; California Department of Transportation (Caltrans), District 7; Department of Conservation; Department of Education; California Energy Commission; California Department of Fish and Game, Region 5; Integrated Waste Management Board; Native American Heritage Commission; Office of Emergency Services; Office of Historic Preservation; Department of Parks and Recreation; Public Utilities Commission; Regional Water Quality Control Board (RWQCB), Region 4; Santa Monica Mountains Conservancy; State Water Resources Control Board: Water Quality; Department of Toxic Substances Control; Department of Water Resources, District 7; California Department of Forestry and Fire Protection (Cal Fire).



**Figure 1**  
**Regional Location Map**



**Figure 2**  
**Vicinity Map**



**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

No environmental factors were found to be potentially affected.

Aesthetics	Greenhouse Gas Emissions	Population/Housing
Agriculture Resources	Hazards & Hazardous Materials	Public Services
Air Quality	Hydrology/Water Quality	Recreation
Biological Resources	Land Use/Planning	Transportation/Traffic
Cultural Resources	Mineral Resources	Utilities/Service Systems
Geology/Soils	Noise	Mandatory Findings of Significance

**DETERMINATION:** (To be completed by the Lead Agency).

On the basis of this initial evaluation:

X	I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
	I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because mitigation for the project will be made by or agreed to by the City and/or future project proponents. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
	I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
	I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

*Peter Noonan*

Peter Noonan, AICP  
Associate Planner

*October 3, 2011*

Date



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**Introduction.**

Neither the Housing Element nor the HMAP includes modifications to development patterns or changes in the pattern of land uses established in the General Plan. These plan updates also do not propose or contemplate specific development projects; however, goals and policies of the plans may result in future actions that could have environmental effects.

Environmental impacts have been evaluated in relation to the baseline of the physical environment as it currently exists in the City today. As allowed by the California Environmental Quality Act (CEQA), this document tiers off of the Negative Declaration and Environmental Initial Study for the Amendment and Policy Update of the City of Beverly Hills General Plan. As detailed in CEQA Section 15152, "Tiering" refers to using the analysis of general matters contained in a broader environmental impact report (EIR) (such as one prepared for a general plan or policy statement) with later EIRs and negative declarations on narrower projects, incorporating by reference the general discussions from the broader EIR and concentrating the later EIR or negative declaration solely on the issues specific to the later project. The focus of the environmental analysis is on those elements of the plans that could change development standards from current standards and practices of the existing Housing Element or design review process, directly remove barriers to, or encourage the construction or redevelopment of, additional residential units within the City, or require other action as a result of a mitigation strategy that may result in an adverse environmental effect.

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<b>1. AESTHETICS. Would the project:</b>				
a) Have a substantial adverse effect on a scenic vista?			<b>X</b>	

There are no officially designated scenic vistas in the City; however, visual resources such as hillsides and ridgelines are visible from various properties and neighborhoods. The General Plan includes a policy in the Open Space element that states, "seek to protect scenic views and vistas from public places" (Policy OS 6.1) (City of Beverly Hills 2010a). The adoption and update of the Housing Element would provide implementation programs to allow for housing requirements in the City to be met, and would not modify development patterns or change the pattern of land uses established in the General Plan. The implementation programs would change some development standards and remove barriers to, or encourage the construction or redevelopment of, additional residential units; however, these changes would not be of the scale or magnitude to allow for development that may cause a substantial affect on the visual environment. Thus, because there are no designated scenic vistas in the City, and the Housing Element would not create or allow for substantial visual changes, the impact on scenic vistas would be **less than significant**.



The strategies in the HMAP are generally updates to codes, retrofitting existing structures for safety, disseminating public education, analysis of systems and infrastructure, and similar actions. The HMAP does not include actions that would create substantial visual changes to the existing aesthetic environment; thus, **no impact** to scenic vistas would result from adoption and implementation of the HMAP.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
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There are currently no designated state scenic highways in the City, and the Scenic Highway Element was removed from the General Plan when it was updated in 2010. Because the City is generally built-out, and most construction is generally redevelopment of existing developed property, there is limited potential to damage scenic resources such as trees, rock outcroppings, and other scenic elements. Therefore, because there are no designated scenic highways in the City, and the Housing Element would not create or allow for substantial visual changes, there would be **no impact** to scenic resources from a state scenic highway.

As described in 1a above, the HMAP does not include actions that would create substantial visual changes to the existing aesthetic environment. Because there are no designated scenic highways in the City, and no substantial visual impacts would result from the HMAP, **no impact** to scenic resources from a state scenic highway would result.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
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The City of Beverly Hills is a well established, urbanized area. New development or redevelopment are required to be consistent with the General Plan standards and policies addressing aesthetic quality, and are subject to a thorough design review process prior to permitting, ensuring project compatibility with the existing visual setting. Visual character may be altered with new development as a result of the Housing Element implementation policies, such as the addition of a second unit to a property or the development of a senior living community. However, required adherence to City design guidelines and policies would ensure that visual character and quality of the surrounding community is maintained. Thus, a **less than significant impact** to visual character and quality would result from implementation of the Housing Element.

As described in 1a above, the HMAP does not include actions that would create substantial visual changes to the existing aesthetic environment. Visual character and quality of the City would not be adversely affected by the mitigation strategies and **no impact** would result.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
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The City is generally built-out with urban development, including commercial and residential uses that generate a significant amount of ambient light. Sources of light and glare include glass building facades, building signage, security lighting, streetlights, parking lot lighting, and automobile headlights. Policy LU 12.2 of the



Land Use Element of the General Plan requires that properties in commercial and office districts be designed with non-glare external lighting (City of Beverly Hills 2010b). The City Municipal Code regulations require that light be shielded and confined within site boundaries to prevent spillage (Section 10-4-314 of the City’s Municipal Code—Lighting of Premises). In addition, Section 10-3-3104 (Standard Review of Development Plan Review) of the City’s Municipal Code requires that development applications be reviewed to ensure that light and glare, among other potential impacts, would not create any significant adverse effects on neighboring properties. Some new light and glare sources may be associated with housing development that would result from implementation of the Housing Element, such as outside security lighting or landscape lighting. However, all new or redevelopment would be required to adhere to City policies and codes to minimize potential lighting issues and glare. As future projects come forward, they will be reviewed for consistency with these requirements. Thus, implementation of the Housing Element would have a **less than significant impact** on day and nighttime views due to creation of light or glare.

As described in 1a above, the HMAP does not include actions that would create new sources of light or glare. For this reason, the HMAP would have **no impact** on day or nighttime views due to creation of light or glare.

e) Create a new source of shade or shadow that would adversely affect shade/shadow sensitive structure or uses?			X	
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The creation of shadows and the resultant shading of nearby land and buildings are not formally regulated in the City planning documents. The Beverly Hills Zoning Code addresses visual effects in sections that set standards for building construction, height, setback, landscaping, lighting, and signage, although the Zoning Code does not directly address shadow creation or shading. As future projects come forward, they will be reviewed for consistency with these requirements. No changes are proposed in existing land use classification or developable areas. Therefore, only minor changes in shading and shadow are anticipated with projects that may add a second unit or other new structure as a result of the policies of the Housing Element. Thus, **less than significant impacts** related to shade or shadow would result from implementation of the Housing Element.

As described in 1a above, the HMAP does not include actions that would enlarge or expand structures that might generate shade or shadows. For this reason, the HMAP would have **no impact** on shade/shadow sensitive structures or uses.

**2. AGRICULTURE AND FOREST RESOURCES.** Would the project:  
*(In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state’s inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board.)*



a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?				X
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The City is almost entirely built-out, and there is minimal land that is not already in urban use. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide importance. The City is located outside of the survey area of the Farmland Mapping and Monitoring Program (California Department of Conservation 2009). Thus, there would be **no impact** from implementation of either the Housing Element or HMAP.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?				X
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There is no zoning for agricultural use in the City, and there are no Williamson Act contracts (City of Beverly Hills 2008). There would be **no impact** on zoning for agricultural use from implementation of either the Housing Element or HMAP.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)) or timberland (as defined in Public Resources Code section 4526)?				X
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There is no zoning for forest land or timberland in the City (City of Beverly Hills 2008). There would be **no impact** on zoning of forest land or timberland from implementation of either the Housing Element or HMAP.

d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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There is no forest land in the City, as it is almost entirely built-out and there is minimal land that is not already in urban use. There would be **no impact** regarding the loss of forest land from implementation of either the Housing Element or HMAP.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
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There is no farmland in the City, and the areas surrounding the jurisdiction of the City are also developed with urban uses. There would be **no impact** regarding the conversion of agricultural land or forest land from implementation of either the Housing Element or HMAP.



<b>3. AIR QUALITY. Would the project:</b>				
a) Conflict with or obstruct implementation of the applicable air quality plan?			X	

The project site is located within the Los Angeles County Air Basin and is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). SCAQMD is responsible for preparing the Regional Air Quality Management Plan (AQMP), which helps direct the regions into compliance with national and state clean air standards. The 2007 AQMP is the most recent plan prepared by SCAQMD, and projects are considered to be consistent with the AQMP if they do not result in the exceedance of AQMP growth estimates and would not jeopardize attainment of the air quality levels identified in the AQMP. The Housing Element does not include specific development projects, but facilitates new development to comply with RHNA requirements. Implementation of the Housing Element would not modify development patterns or change the pattern of land uses established in the General Plan. Development resulting from the Housing Element is not beyond the existing available development capacity or growth anticipated in the General Plan and, thus, would be considered consistent with the AQMP, as the growth was accounted for in the AQMP growth projections.

Additionally, any future development projects would have to be assessed at the time of project proposal to show consistency with the most recent version of the AQMP. Projects would be evaluated for construction and operational impacts to air quality plans, standards, and sensitive receptors. For the reasons outlined above, implementation of the Housing Element would not conflict with or obstruct implementation of the applicable air quality plan and impacts would be **less than significant**.

The HMAP does not include actions that would necessitate substantial construction or other development activities that might generate air quality emissions that could conflict with or obstruct the implementation of the AQMP. For this reason, implementation of the HMAP would result in a **less than significant impact**.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
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New development anticipated in the Housing Element would generate emissions from construction activities, including equipment, worker vehicle trips, site preparation, and construction. Operational emissions would occur through mobile sources, such as increased vehicle trips, and stationary sources, such as natural gas and electricity use and wood-burning fireplaces.

As described above, implementation of the Housing Element would not modify development patterns or change the pattern of land uses established in the General Plan. Development resulting from the Housing Element is not beyond the growth anticipated in the General Plan, and would not result in additional emissions above levels that have been previously considered.

Additionally, to minimize construction- and operation-related air quality impacts, future development projects would be required to comply with applicable SCAQMD regulations, including the following:



- Rule 1113: Architectural Coatings, to reduce volatile organic compounds
- Rule 403: Fugitive Dust, to reduce dust generated during construction

At the local level, in 2011, the City adopted the State of California’s Green Building Code (known as Calgreen). In adopting the Calgreen building code, the state’s code was modified to preserve the City’s original green building program. The City’s modifications of Calgreen include requiring new multi-family and commercial buildings to be constructed to 15% greater energy efficiency than the state’s Energy Code (Title 24), and to include solar energy collection systems. Further, the Housing Element includes policies and implementation programs that seek to minimize air quality impacts. The Housing Element proposes that new development be infill and has a policy that promotes development near transit stops and anticipated transit stations (H 2.8). Infill development and development near transit generally results in lower vehicle miles traveled and, therefore, fewer exhaust emissions. Implementation programs 9.4, “Home Repair and Improvement,” and 10.6, “Sustainability and Green Building,” promote energy efficiency, which would lower emissions associated with energy consumption. It is expected that air quality may improve with implementation of the above-mentioned policies. For these reasons, implementation of the Housing Element would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts would be **less than significant**.

The HMAP does not include actions that would necessitate substantial construction or other development activities that might generate air quality emissions that could violate any air quality standard or contribute substantially to an existing or projected air quality violation. For this reason, implementation of the HMAP would result in a **less than significant impact**.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in a state of non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
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The Los Angeles County Air Basin is currently designated as non-attainment for ozone, carbon monoxide (CO), and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>). As described above, implementation of the Housing Element would not modify development patterns or change the pattern of land uses established in the General Plan. Development resulting from the Housing Element would not be beyond the growth anticipated in the General Plan and would not result in additional emissions above levels that have been previously considered. Additionally, the Housing Element includes policies and implementation programs that promote minimizing air quality impacts, as outlined in 3b, above. For these reasons, implementation of the Housing Element would not result in a cumulatively considerable net increase of any criteria pollutant, and impacts would be **less than significant**.

The HMAP does not include actions that would necessitate substantial construction or other development activities that might generate air quality emissions that could result in a cumulatively considerable net increase of any criteria pollutant. For this reason, implementation of the HMAP would result in a **less than significant impact**.



d) Expose sensitive receptors to substantial pollutant concentrations?			X	
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Implementation of the Housing Element would not modify development patterns or change the pattern of land uses established in the General Plan; thus, it would not place sensitive receptors in new areas or different areas that may be subject to substantial pollutant concentrations. As described above for 3a and 3b, implementation of the Housing Element would not generate substantial air emissions that could affect sensitive receptors. Additionally, air quality pollutants may be reduced due to the policies and requirements listed in 3b. For these reasons, the Housing Element would not expose sensitive receptors to substantial pollutant concentrations, and the impact would be **less than significant**.

The HMAP does not include actions that would necessitate substantial construction or other development activities that might generate air quality emissions that could violate any air quality standard or contribute substantially to an existing or projected air quality violation. For this reason, implementation of the HMAP would result in a **less than significant impact**.

e) Create objectionable odors affecting a substantial number of people?			X	
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The development of residential housing would generate typical construction-related odors such as diesel exhaust and architectural coatings. These temporary odors are generally not considered to be highly offensive and would be limited to people in the immediate construction area. As is typical of residential developments, operation of the housing units would not generate objectionable odors. Thus, implementation of the Housing Element would not create objectionable odors that would affect a substantial number of people, and the impact would be **less than significant**.

The HMAP does not include actions that would necessitate substantial construction or other development activities that might generate odors. For this reason, implementation of the HMAP would result in a **less than significant impact** regarding odor generation.

<b>4. BIOLOGICAL RESOURCES.</b> Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	

Lands in the City are largely urbanized and contain few significant biological resources. There is minimal natural area remaining, and the majority of vegetation in the City is maintained landscaping. Areas that may provide habitat for special-status species are primarily located in the chaparral areas in the Santa Monica Mountains north of Sunset Boulevard. Within the Open Space Element of the General Plan, Figure OS2 shows that the California Natural Diversity Database indicates that one plant species, Braunton's milk vetch,



and two wildlife species, coast horned lizard and hoary bat, have the potential to occur within the City’s jurisdiction (City of Beverly Hills 2010a). The Housing Element would provide implementation programs to allow for housing requirements in the City to be met, and would not modify development patterns or change the pattern of land uses established in the General Plan. The implementation programs would change some development standards and remove barriers to, or encourage the construction or redevelopment of, additional residential units; however, any resulting development would likely occur on properties with existing development or be a reuse of an existing development. As future projects come forward, they will be reviewed for consistency with federal, state, and local policies addressing special-status species. Because there is minimal natural land or habitat within the City to support sensitive biological resources, and development as a result of the implementation policies in the Housing Element would generally result in modifications to existing development or reuse of urbanized properties, there would be a **less than significant impact** to special-status species.

The mitigation strategies in the HMAP generally include updates to codes, retrofitting existing structures for safety, disseminating public education, analysis of systems and infrastructure, and similar type actions. The HMAP does not include actions that would necessitate substantial construction or other development activities that might adversely affect sensitive biological resources. For this reason, implementation of the HMAP would result in a **less than significant impact** to special-status species.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
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There are no riparian or sensitive habitats that are known to occur in the City. There is minimal natural area remaining, and the majority of vegetation in the City is maintained landscaping; other areas are covered with hard urban surfaces. Within the Open Space Element of the General Plan, Figure OS2 shows that the California Natural Diversity Database identifies three sensitive vegetation communities within 5 miles of the City: California walnut woodland, southern coast live oak riparian forest, and southern sycamore alder riparian woodland. None of these sensitive vegetation communities are located within or adjacent to the City. Therefore, implementation of the Housing Element would have **no impact** on riparian or other sensitive natural communities.

Similarly, because there are no riparian or sensitive habitats that are known to occur in the City, implementation of the HMAP would have **no impact** on riparian or other sensitive natural communities.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
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The majority of the City is developed with urban uses with minimal natural surfaces. Based on the U.S. Fish and Wildlife Service National Wetland Inventory, there are no known wetlands within or adjacent to the City



(USFWS 2011). Therefore, implementation of the Housing Element would have **no impact** on federally protected wetlands.

Similarly, because there are no riparian or sensitive habitats that are known to occur in the City, implementation of the HMAP would have **no impact** on federally protected wetlands.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites.			X	
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Although some local movement of wildlife would be expected to occur through the canyons and greenbelts within the City, the majority of the area is developed with urban uses and has little or no potential to support local migratory movement or wildlife nursery sites due to the highly urbanized nature of the City and surrounding areas. Implementation policies of the Housing Element would change some development standards and remove barriers to, or encourage the construction or redevelopment of, additional residential units. However, any resulting development would likely occur within existing developed properties, and no expansion or change to the existing developable areas would occur, thus minimizing the potential to interfere with a wildlife corridor. Additionally, the Open Space Element of the General Plan states in Policy OS 1.1, "Encourage new development on hillsides and in canyon areas to preserve natural land formations and native vegetation, and to set aside areas as greenbelts and wildlife corridors when feasible" (City of Beverly Hills 2010a). New or redevelopment would be subject to this policy addressing wildlife corridors. For these reasons, implementation of the Housing Element would not substantially interfere with wildlife corridors or wildlife nursery sites, and a **less than significant impact** would result.

Similarly, for the reasons outlined above, implementation of the HMAP would not substantially interfere with wildlife corridors or wildlife nursery sites, and a **less than significant impact** would result.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
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Implementation of the Housing Element would be subject to all applicable federal, state, regional, and local policies and regulations related to the protection of important biological resources. Specifically, any development resulting from the implementation programs of the Housing Element would be required to comply with the following policies and regulations:

- *Federal Endangered Species Act*
- *Federal Migratory Bird Treaty Act*
- *California Endangered Species Act*
- *California Fish and Game Code*
- *California Environmental Quality Act* — Treatment of Listed Plant and Animal Species
- *City of Beverly Hills Municipal Code* — Regulations of Trees on Private Property
- *City of Beverly Hills Open Space Element* — Natural and Open Space Protection



The updated Housing Element does not include changes in land use or allowable development areas, and future development would be required to comply with the provisions of federal, state, regional, and local laws, regulations, and plans. Further, all existing policies related to protection and preservation of biological resources in the City would remain in place. For these reasons, implementation of the Housing Element would not conflict with plans or policies protecting biological resources, and a **less than significant impact** would result.

Similarly, for the reasons outlined above, implementation of the HMAP would not conflict with plans or policies protecting biological resources, and a **less than significant impact** would result.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, and other approved local, regional, or state habitat conservation plan?				X
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There is no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that applies to the City. Thus, implementation of the Housing Element would not conflict with such plans, and **no impact** would result.

Similarly, implementation of the HMAP would not conflict with such plans, and **no impact** would result.

<b>5. CULTURAL RESOURCES.</b> Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?			X	

The Historic Preservation Element of the General Plan states that there are six properties in Beverly Hills that are listed on the National Register of Historic Places (National Register): one residence, two public parks, two commercial properties, and one government property, as well as one additional site that is eligible, but not listed on the National Register. In addition, the Historic Resource Inventory compiled by the City in 1985/1986 includes 371 properties, 53 of which were designated 3 or higher by the State Office of Historic Preservation's rating scale. Since the compilation of the inventory, three additional sites were listed on the California Register of Historical Resources that were rated 3 or higher, bringing the number of sites designated 3 or higher within the City to 56. The Historic Resource Inventory has not been adopted by the City as a local register, but it serves as a guide to potentially significant historic properties that may have historic or cultural significance to the City (City of Beverly Hills 2010c). The Historic Preservation Element contains goals and policies aimed at protecting the City's historic resources, including HP1, which is to value and preserve significant cultural resources, and HP2, which is promotion of the City's historic resources.

Implementation policies of the Housing Element would change some development standards and remove barriers to, or encourage the construction or redevelopment of, additional residential units. It is possible that new or redevelopment could affect a historic resource within the City. However, all development would be required to adhere to regulations protecting historic resources, such as the National Historic Preservation Act, CEQA, local General Plan policies, and review by the Beverly Hills Architectural Commission acting as the City's Landmarks Advisory Commission. Compliance with these and other regulatory requirements would minimize the potential for development to cause a substantial adverse change in the significance of a historic



resource. Thus, a **less than significant impact** would result.

The HMAP does not include actions that would necessitate substantial construction or other development activities that might adversely affect historic resources. Similar to the analysis of the Housing Element, implementation of the HMAP would not cause a substantial adverse change in the significance of a historic resource, and a **less than significant impact** would result.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?			X	
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Ground-disturbing activities, particularly in areas that have not previously been excavated, have the potential to damage or destroy historic or prehistoric archaeological resources that may be present on or below the ground surface. Implementation programs of the Housing Element may result in new or redevelopment requiring excavation into previously undisturbed areas. This ground disturbance could have the potential to impact an unknown archeological resource. However, the Historic Preservation Element of the General Plan provides a requirement to protect archeological resources during construction activities. Policy HP 1.8 of the Historic Preservation Element states, “Temporarily suspend all earth-disturbing activity within 100 feet of a potential resource if any such resources are discovered during construction-related earth-moving activities to assess the significance of the find, and require appropriate mitigation before work” (City of Beverly Hills 2010c). Required adherence to this policy would reduce the potential for an adverse change to an unknown archaeological resource during ground-disturbing activities by halting work if a resource is discovered. Thus, resulting development from implementation of the Housing Element would have a **less than significant impact** regarding an adverse change in the significance of an archeological resource.

The HMAP does not specifically include actions that would necessitate substantial construction or other development activities that may require excavation into previously undisturbed ground. Similar to the analysis of the Housing Element, any construction associated with implementation of the HMAP would be required to comply with Historic Preservation Element Policy HP 1.8 and, thus, would not cause a substantial adverse change in the significance of an archeological resource; a **less than significant impact** would result.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
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Paleontological resources may be present in fossil-bearing soils and rock formations below the ground surface. Ground-disturbing activities in fossil-bearing soils and rock formations have the potential to damage or destroy paleontological resources that may be present below the ground surface. Therefore, construction-related and earth-disturbing actions could damage or destroy fossils in these rock units. Implementation programs of the Housing Element may result in new or redevelopment requiring excavation into previously undisturbed rock units. This disturbance could have the potential to impact an unknown paleontological resource. However, the Historic Preservation Element of the General Plan provides a requirement to protect archeological resources during construction activities. Policy HP 1.9 of the Historic Preservation Element states, “In the event that excavation reveals any paleontological resources, suspend earth-disturbing work until the resource is evaluated. Allow work to resume only after the find has been appropriately mitigated” (City of Beverly Hills 2010c). Required adherence to this policy would reduce the potential for an adverse change to an unknown



paleontological resource during ground-disturbing activities by halting work if a resource is discovered. Thus, resulting development from implementation of the Housing Element would have a **less than significant impact** regarding unique paleontological resources.

The HMAP does not specifically include actions that would necessitate substantial construction or other development activities that may require excavation into previously undisturbed rock units. Similar to the analysis of the Housing Element, any construction associated with implementation of the HMAP would be required to comply with Historic Preservation Element Policy HP 1.9 and, thus, would result in a **less than significant impact** regarding unique paleontological resources.

d) Disturb any human remains, including those interred outside of formal cemeteries?			X	
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Human burials outside of formal cemeteries often occur in prehistoric archeological contexts. Although the majority of the City is built-out and has been previously disturbed, the potential still exists for these resources to be present. Although human remains are not expected to be found, new ground disturbance during construction resulting from implementation programs of the Housing Element could potentially disturb unknown human remains. If human remains are encountered during grading and excavation, State Health and Safety Code Section 7050.5 requires that no further disturbance occurs until the County Coroner has made a determination of origin and disposition, pursuant to Public Resources Code Section 5097.98. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the County Coroner will notify the Native American Heritage Commission (NAHC), who will notify a Most Likely Descendent (MLD). With the permission of the landowner, the MLD may inspect the site of discovery. The MLD will complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Adherence to these required regulations would reduce any potential impact related to the discovery of human remains to **less than significant**.

The HMAP does not specifically include actions that would necessitate substantial construction or other development activities that may require excavation into previously undisturbed ground. However, if ground disturbance is necessary, similar to the analysis of the Housing Element, adherence to the regulations detailed above would reduce any potential impact related to the discovery of human remains to **less than significant**.

<b>6. GEOLOGY AND SOILS.</b> Would the project				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? ( <i>Refer to Division of Mines and Geology Special Publication 42</i> )			X	



The City of Beverly Hills is located in the Los Angeles Basin at the southern edge of the Transverse Range in an area exposed to risk from multiple earthquake fault zones. The Alquist–Priolo Earthquake Fault Zoning Map does not show a known earthquake fault located within the City (California Department of Conservation 1986). However, the Safety Element of the General Plan identifies several active faults in or near the City, including the Hollywood and Santa Monica Faults, which converge within the City, and the Newport–Inglewood Fault, located approximately 2 miles south of the City (City of Beverly Hills 2010d). Each fault has the potential to generate moderate to large earthquakes that could cause rupture and ground shaking in Beverly Hills and nearby communities.

The Housing Element includes implementation programs that would change some development standards and remove barriers to, or encourage the construction or redevelopment of, additional residential units, but it would not modify land use or allowable development areas. The Safety Element of the General Plan includes Policy S5.1, which requires all new development and redevelopment to be in compliance with seismic and geologic hazard safety standards. Additionally, required adherence to regulatory codes, such as the Uniform Building Code (UBC) and California Building Code (CBC), would ensure that all new or redevelopment would be built to adequately withstand seismic activity through proper engineering and design. Required adherence to these regulatory standards would limit any potential adverse effects to people or structures due to fault rupture, and the potential impact would be **less than significant**.

The HMAP provides specific strategies to prevent damage from the rupture of an earthquake fault. The strategies work toward providing safety measures to protect the public, critical facilities, infrastructure, private and public property, and the environment from natural and built hazards before the occurrence of a disaster. Specific to earthquake–related disasters, the HMAP would continue to require upgrades of existing unreinforced masonry buildings, provide assistance programs for older adults who need to seismically retrofit their homes, and establish more seismic data collection sampling stations within the City. No specific project is proposed that would expose people or structures to substantial hazards from rupture of a known fault, and the HMAP strategies would serve to better protect the community from seismic–related hazards. Thus, **no impact** from fault rupture would result.

ii)	Strong seismic ground shaking?			X	
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The description of the seismic setting of the City provided in 6ai, above, is applicable to the analysis of strong seismic ground shaking. Similar to the discussion above, Housing Element implementation programs may result in the construction or redevelopment of additional residential units that would be subject to seismically induced ground shaking. However, required adherence to regulatory codes, such as the Safety Element of the General Plan, UBC, and CBC, would ensure that all new and redevelopment would be built to adequately withstand seismic ground shaking through proper engineering and design. Required adherence to these regulatory standards would limit any potential adverse effects to people and structures due to ground shaking, and the potential impact would be **less than significant**.

The HMAP provides specific strategies to prevent damage from earthquake activity. As described above in 6ai, specific earthquake–related mitigation strategies would work toward protecting the public from hazards due to earthquakes. No specific project is proposed that would expose people and structures to substantial hazards



from seismically induced ground shaking, and the HMAP strategies would serve to better protect the community from seismic-related hazards. Thus, **no impact** from seismic ground shaking would result.

iii)	Seismic-related ground failure, including liquefaction?			X	
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Liquefaction results from the loss of soil strength due to a sudden increase in pore water pressure during shaking. Liquefaction causes foundations of structures to move, leading to varying degrees of structural damage. Figure S4 of the Safety Element of the General Plan identifies a portion of the City, mainly along the southeastern boundaries and in the very northern portion of the City within the foothills, to be subject to liquefaction. Most of the areas subject to liquefaction are already developed with existing urban uses, such as residential and commercial development. The City’s proximity to active seismic faults creates a high potential for liquefaction to occur. The actual hazard posed at any given site within the liquefaction zone is dependent on the type of building foundation, structural design, and the as-graded compaction coefficient of the soil on which the structure is built. Any new or redevelopment resulting from implementation programs of the Housing Element would be required to adhere to regulatory codes such as the UBC and CBC; this would ensure that all new development would be designed and built to adequately avoid potential liquefaction hazards. This would limit any potential adverse effects to people or structures due to liquefaction, and the potential impact would be **less than significant**.

The HMAP does not provide a specific measure to address liquefaction hazards. However, the mitigation strategies outlined to prevent damage from earthquake activity would also reduce liquefaction hazards, as liquefaction often results from seismic activity. The upgrades of existing unreinforced masonry buildings and assistance programs to seismically retrofit homes would reduce potential liquefaction hazards to structures and residents. No specific project is proposed that would expose people or structures to substantial hazards from liquefaction, and the HMAP strategies would serve to better protect the community from these hazards. Thus, **no impact** from liquefaction would result.

iv)	Landslides?			X	
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As described in the Safety Element of the General Plan, landslides in the City are often associated with earthquakes, but other factors may also influence their occurrence, including the slope, the moisture content of the soil, and the composition of the subsurface geology. Heavy rains or improper grading may trigger a landslide. As shown in Figure S4 of the Safety Element of the General Plan, a portion of the City’s hillside areas, north of Sunset Boulevard, are susceptible to landslides (City of Beverly Hills 2010d). The Housing Element implementation programs may result in the construction or redevelopment of additional residential units that would be subject to landslide hazards if located in areas of steep slopes such as those in the northern limits of the City. However, required adherence to regulatory codes, such as the UBC, CBC, and other grading requirements, would ensure that all new or redevelopment would be built to avoid landslide hazards through proper engineering and design. Required adherence to these regulatory standards would limit any potential adverse effects to people or structures due to landslides, and the potential impact would be **less than significant**.



The HMAP provides specific strategies to prevent damage from landslides. The mitigation strategy includes geotechnical investigations to update landslide hazard maps. By investing the potential for landslides and updating the landslide hazard map, the City could better anticipate areas subject to landslide hazards and take necessary precautions with new or redevelopment in those areas, as well as consider preventive measures for existing development. No specific project is proposed that would expose people or structures to substantial hazards from landslides, and the mitigation strategy would serve to better protect the community from landslide hazards. Thus, **no impact** from landslides would result.

b) Result in substantial soil erosion or the loss of topsoil?			X	
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Topsoil is the very uppermost layer of soil and has the highest concentration of organic matter and microorganisms, making it very fertile and valuable for plant growth. Soil erosion can occur when the soil layer is left exposed to wind or water and is not held in place through means such as vegetation or other stabilization methods. Since most of the City is built-out, and most surfaces are covered with urban uses or landscaping, there is minimal potential for substantial soil erosion or loss of topsoil. During construction, ground-disturbing activities can result in potential erosion; however, construction projects that are more than 1 acre in size are required to prepare a Storm Water Pollution Prevention Plan to prevent erosion and sedimentation of storm water, as required by the City's Storm Water Program (City of Beverly Hills 2011a). Compliance with this and other erosion-reducing requirements, such as the General Construction Permit issued by the State Water Resources Control Board, would minimize erosion impacts from future development projects that may result from implementation of the Housing Element; therefore, a **less than significant impact** would result.

The HMAP does not specifically include actions that would necessitate substantial construction or other development activities that may result in ground disturbance and potential soil erosion. However, if ground disturbance were necessarily, similar to the analysis of the Housing Element, adherence to the regulations detailed above would reduce any potential impact related to loss of topsoil or substantial soil erosion to **less than significant**.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
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Lateral spreading occurs as a result of liquefaction. As such, liquefaction-prone areas could also be susceptible to lateral spreading. The City has experienced limited subsidence over the years; however, it is still a potential hazard within the City (City of Beverly Hills 2010d). Individual properties within the City may be developed or redeveloped as a result of implementation programs of the Housing Element, and it is possible that unstable soil conditions may exist within future development or redevelopment sites that could cause hazards or damage related to lateral spreading, subsidence, liquefaction, or collapse. However, unstable soil conditions would be controlled through proper engineering and adherence to required building standards, such as City construction codes and standards, the UBC, and the CBC. Therefore, any unstable soil impacts associated with implementation of the Housing Element would be **less than significant**.



The HMAP does not specifically include actions that would necessitate substantial construction or other development activities that may result in hazards due to unstable soil conditions. However, if construction were necessary, similar to the analysis of the Housing Element, adherence to the regulations detailed above would reduce any potential impact related to unstable soil conditions to **less than significant**.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
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Soils that expand when exposed to water are considered expansive soils. Expansion and contraction of soils can cause structural damage to foundations and roads without proper structural engineering. Clay soils in Beverly Hills have potential for expansion and would swell and shrink with changes in moisture content (City of Beverly Hills 2010d). The City requires a site-specific foundation investigation and report for any new development that identifies potentially unsuitable soil conditions and contains appropriate recommendations for foundation type and design criteria that conform to the analysis and implementation criteria described in the City's Building Code. Individual properties within the City may be developed or redeveloped as a result of implementation programs of the Housing Element, and it is possible that expansive soil conditions may exist within future development or redevelopment sites that could cause hazards or damage. However, expansive soil conditions would be controlled through proper engineering and adherence to required building standards, such as City construction codes and standards, the UBC, and the CBC. Therefore, any impacts from expansive soils associated with implementation of the Housing Element would be **less than significant**.

The HMAP does not specifically include actions that would necessitate substantial construction or other development activities that may result in hazards due to expansive soil conditions. However, if construction were necessary, similar to the analysis of the Housing Element, adherence to the regulations detailed above would reduce any potential impact related to expansive soils to **less than significant**.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			X	
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The City of Beverly Hills is almost entirely built-out with established utility services, including sewer systems. The use of septic tanks or alternative waste water disposal systems are not anticipated with any future project that may result from the implementation programs of the Housing Element, as new or redevelopment would likely not expand to areas not served by sewer systems. Thus, implementation of the Housing Element would have **no impact** relative to the use of septic tanks or other waste water disposal methods.

The HMAP does not include actions that would necessitate development that would rely on septic tanks or other waste water disposal methods. Thus, **no impact** would result.



<b>7. GREENHOUSE GAS EMISSIONS.</b> Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	

The Housing Element does not contain specific development projects, but is intended to facilitate equitable housing in the City through compliance with RHNA requirements. The Housing Element does not change any land use designations or areas of development to meet these requirements. Rather, the Housing Element focuses on housing infill, rehabilitation, and conservation. New development could result in 554 new housing units within the City. Although most development typically results in increased energy consumption, vehicular travel, water consumption, and waste production, infill development provides an opportunity for the development to occur in areas located near transit or near employment centers. These types of infill projects provide residents with more feasible transportation alternatives such as public transit, walking, biking, and carpooling, which reduce regional greenhouse gas (GHG) emissions.

The state has not adopted thresholds for what would constitute a significant impact for GHG, but the CEQA Guidelines allow a lead agency to consider thresholds previously adopted or recommended by other agencies. The City does not currently have adopted thresholds of significance for GHG emissions. The City is located within the jurisdiction of the SCAQMD, which, in 2008, released “Interim GHG Emissions Significance Thresholds” (SCAQMD 2008). SCAQMD’s interim guidance suggests a tiered approach to determining significance, with Tier 3 including quantitative thresholds for industrial, commercial, and residential projects. The threshold for industrial projects is 10,000 metric tons (MT) of carbon dioxide equivalent per year (CO<sub>2</sub>e/yr), and the threshold for residential and commercial projects is 3,000 MT CO<sub>2</sub>e/yr. Since 2008, SCAQMD has proposed revisions to these thresholds (SCAQMD 2010). The Tier 3 proposed screening threshold for residential projects was revised to 3,500 MT CO<sub>2</sub>e/yr. If a project generates GHG emissions lower than the threshold, it may be considered less than significant. If a project’s GHG emissions exceed the threshold, mitigation measures must be identified to reduce GHG emissions to a less-than-significant level. Tier 4 recommends using performance standards to evaluate a project’s GHG impact. SCAQMD has suggested an efficiency threshold of 6.6 MT CO<sub>2</sub>e/yr per service population (SP) (employees plus residents) for plan-level thresholds, and 4.8 MT CO<sub>2</sub>e/yr per SP for project-level documents. This is a plan-level document; thus, if the Housing Element’s GHG efficiency is less than the 2020 GHG efficiency threshold of 6.6 MT CO<sub>2</sub>e/yr per SP by 2020, it would not conflict with existing plans intended to lower GHG emissions, such as the Assembly Bill (AB) 32 Scoping Plan, and the impact would be **less than significant**.

GHG emissions can occur during both the construction phase of a project and the operational phase. These two phases are discussed below.

Construction Emissions

The Housing Element does not include specific development projects; however, full implementation of the Housing Element could result in increased emissions through construction and operation of additional housing units. Estimation of emissions resulting from full implementation was conducted using CalEEMod, a California land-use emissions computer model developed by SCAQMD that quantifies potential criteria pollutants and GHG emissions associated with land-use projects.



Construction-related GHG exhaust emissions would be generated by sources such as heavy-duty off-road equipment, trucks hauling materials to the site, and worker commutes. Total construction emissions for full implementation of the Housing Element were estimated using CalEEMod. Emissions related to construction were estimated to be approximately 2,560 MT CO<sub>2</sub>e. Construction emissions are considered finite and, in SCAQMD’s Interim Guidance, construction emissions are amortized over 30 years, leading to an annual rate of 85 MT CO<sub>2</sub>e/yr.

Operational Emissions

Operational emissions were calculated using the CalEEMod model as described for construction emissions. According to the Southern California Association of Governments (SCAG), the average household size in Beverly Hills in 2010 was 2.4 occupants (SCAG 2011). Therefore, full implementation of the Housing Element could lead to a maximum of approximately 1,330 additional residents. RHNA housing units have higher occupancy rates, but 2.4 residents per household would be considered a conservative estimate. No additional jobs would be expected as a result of the Housing Element; therefore, the service population consists only of residents.

Table 2 provides the annual operational GHG emissions associated with full implementation of the Housing Element in year 2020. The total GHG emissions shown in Table 2 (7,559 MT CO<sub>2</sub>e/yr in 2020) includes typical operational emissions (e.g., mobile sources, area sources, electricity consumption, water consumption, and solid waste generation) as well as amortized construction emissions over 30 years. Using this total annual emission level and the proposed population increase, this is equivalent to a GHG efficiency of 5.7 MT CO<sub>2</sub>e/yr in 2020.

**Table 2**  
**Summary of Modeled Greenhouse Gas Emissions (CO<sub>2</sub>e)**  
**from Full Implementation of the Housing Element (Year 2020)**

Sector	CO <sub>2</sub> e (MT/yr)
Operational Emissions	7,474
Electricity and Natural Gas	1,689
Transportation	6,739
Water	244
Waste	132
Amortized Construction Emissions <sup>1</sup>	85
Total Emissions	7,559
Efficiency (MT CO <sub>2</sub> e/SP)	5.7
SCAQMD Proposed Threshold (MT CO <sub>2</sub> e/yr per SP)	6.6
Does the Housing Element Exceed the Proposed Threshold?	No

<sup>1</sup> SCAQMD recommends amortizing construction emissions over the life of the project, estimated to be 30 years.

<sup>2</sup> SCAG estimates the average household size in Beverly Hills in 2010 was 2.4 persons (SCAG 2011). Modeled by AECOM. See Appendix C for details.



Transportation emissions were the largest emissions sector and were estimated to be 6,739 MT CO<sub>2</sub>e/yr in 2020 using CalEEMod default trip rates and distances. The transportation emission estimates include state-level GHG emissions-reducing regulations AB 1493 and The Low Carbon Fuel Standard (LCFS), which would reduce GHG emissions through lower vehicle emission standards and reduced carbon intensity of fuels. AB 1493 requires the California Air Resources Board (ARB) to develop and adopt regulations that reduce GHG emissions from passenger vehicles, light-duty trucks, and other non-commercial vehicles for personal transportation. The LCFS is a performance standard with flexible compliance mechanisms that incentivizes the development of a diverse set of clean, low-carbon transportation fuel options to reduce GHG emissions. EO-S-01-07 reduces the carbon intensity of California's transportation fuels by at least 10% by 2020.

In addition, infill development generally locates housing closer to public transit opportunities or employment centers, which reduces the need for single-occupancy vehicle travel and reduces trip distances to reach employment and other commercial amenities. Infill development also allows residents to more conveniently use alternative modes of transport (e.g., walking, biking, transit). Furthermore, the Housing Element recommends that development occur through infill. The default trip rates and trip distances included in CalEEMod do not account for the trip reduction and trip distance reduction associated with in-fill projects and, therefore, the vehicle-related GHG emissions may be lower than those estimated.

The Housing Element describes the City's efforts to promote alternative transportation such as walking and bus service. The Housing Element contains Policy H 2.8, Transit-Oriented Housing, which promotes development in proximity to transit stops and anticipated transit stations. Additionally, the City's General Plan includes multiple goals and supporting policies aimed at promoting alternative transportation, such as those within Circulation Element Goal 2, which is the development of a safe, comprehensive, and integrated transit system that serves as an essential component of a multi-modal mobility system within the City.

Electricity and natural gas were the second-largest operational emissions sector, estimated to be 1,689 MT CO<sub>2</sub>e/yr in 2020. The state has adopted a Renewable Portfolio Standard (RPS) that is not included in the emissions estimates, but would reduce GHG emissions associated with electricity production and consumption. Senate Bill (SB) 1078, SB 107, EO-S-14-08, and SB X1-2 have established increasingly stringent RPS requirements for California utilities. RPS-eligible energy sources are wind, solar, geothermal, biomass, and small-scale hydro.

- SB 1078 required investor-owned utilities to provide at least 20% of their electricity from renewable resources by 2020.
- SB 107 accelerated the SB 1078 timeframe to take effect in 2010.
- EO-S-14-08 increased the RPS further to 33% by 2020. Southern California Edison, the City's electricity provider, currently provides 19.4% of its electricity from renewable sources.
- SB X1-2 codified the 33% RPS by 2020 requirement established by EO-S-14-08.

Within the Housing Element, two implementation programs have been identified that would promote energy-efficient development. These are Imp 9.4, Home Repair and Improvement, which would provide assistance to low-income households for a variety of repairs and improvements, including energy conservation activities, and would provide \$2,000 to \$5,000 to 40 households per year, and Imp 10.6, Sustainability and Green

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Building, which describes the City’s 2011 adoption and modification of the State of California’s Green Building Code (known as Calgreen) to require new multi-family and commercial buildings to be constructed to 15% greater energy efficiency than the state’s Energy Code (Title 24) and to include solar energy collection systems.

In accordance with Table 2, the water and waste sectors are estimated to account for a total of 376 MT CO<sub>2</sub>e/year in 2020. Current legislation (SB 7x) requires that the state achieve a 20% reduction in urban per-capita water use by December 31, 2020. SB 7x requires each urban retail water supplier to develop both long-term urban water-use targets and an interim urban water-use target. SB 7x also creates a framework for future planning and actions for urban and agricultural users to reduce per-capita water consumption 20% by 2020, which would lower the emissions associated with water consumption. This measure was not included in the emissions estimates, but would provide additional reductions due to lower energy (and related GHG emissions) from transport, conveyance, and treatment of water as consumption is reduced.

Based on the modeled GHG emissions and analysis presented above, implementation of the Housing Element would result in GHG emissions with an efficiency of 5.7 CO<sub>2</sub>e/yr, which is less than the 2020 GHG efficiency threshold of 6.6 MT CO<sub>2</sub>e/yr. Thus, it would not result in GHG emissions that exceed the SCAQMD threshold. Additionally, emissions would be reduced further through state law requirements and City policies, as described. For these reasons, the Housing Element would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment; the resulting impact would be **less than significant**.

The HMAP includes policies related to disaster preparedness. Building reinforcements may result in construction emissions that would result in GHG emissions. As discussed above, construction emissions are finite and are amortized over the life of the project. Specific projects are not described in the HMAP; therefore, the number of buildings and the level of construction that would be necessary for adequate reinforcement or other activities related to disaster preparedness are unknown at this time. Projects that will be subject to additional construction would have to comply with building codes and emissions thresholds at the time of project implementation. Therefore, the impact is **less than significant**.

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			X	
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As shown in Table 2 above, the increased dwelling units associated with the updated Housing Element would operate at a GHG efficiency lower than the suggested SCAQMD threshold. In addition, the GHG analysis does not account for all of the factors that would reduce operational GHG emissions beyond those shown in Table 2 (e.g., lower vehicle trip rates, reduced trip distances). If a project would operate below the suggested GHG efficiency, it would be considered to accommodate future growth while helping achieve the goal of AB 32. Therefore, the Housing Element would not conflict with the AB 32 Scoping Plan, or any other plans, policies, or regulations for the purpose of reducing GHG emissions. Neither the City nor any other agency with jurisdiction over the project has adopted climate change or GHG reduction measures with



which the General Plan Amendments would conflict. The impact would be **less than significant**.

The HMAP does not include actions that would necessitate substantial development or generate extensive vehicle trips that may cause GHG emissions. The HMAP would not conflict with an applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs, and the impact would be **less than significant**.

c) Would the project require or result in the construction of new energy production or transmission facilities, or expansion of existing facilities the construction of which could cause a significant environmental impact?			X	
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Electricity in the City is supplied by Southern California Edison (SCE), and natural gas is provided by Southern California Gas Company (SCGC). Implementation of the Housing Element would result in additional energy demand within the City; however, policies and programs included in the Housing Element, as well as the Sustainable City Plan adopted in 2009 (City of Beverly Hills 2009a), ensure that the additional energy demand is used efficiently. The City's adoption of Calgreen, as modified by the City, requires that new multi-family housing exceed Title 24 energy requirements by 15% and that new developments install photovoltaics, further reducing the demand to existing energy providers. The General Plan EIR Section 4.14.1 indicates that current energy needs are met by SCE and SCGC. Implementation of the Housing Element is not expected to result in the construction or expansion of production or transmission facilities. Therefore, the impact is **less than significant**.

The HMAP does not include actions that would necessitate development that would require additional energy production or transmission facilities. Therefore, **no impact** would result.

d) Would the Proposed Project encourage the wasteful or inefficient use of energy?			X	
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Under full implementation of the Housing Element, development requiring additional energy, both during construction and operation, would occur. Energy consumption is used in residential units for lighting, heating, cooling, cooking, transportation, water delivery, and other activities. Energy consumption would be required during the finite construction period for transportation, lighting, and other activities. The policies and implementation programs discussed above include providing grants for home energy efficiency (Imp 9.4), and require new development to exceed Title 24 energy standards (Imp 10.6) by 15% and to install photovoltaics. In addition, the City adopted a Sustainable City Plan in 2009 that includes a goal to encourage the use of energy in a clean and efficient manner, and the use of renewable energy sources, with the following policies:

1. Maximize energy efficiency in both City operations and Citywide.
2. Maximize the use of renewable-energy-generating systems and other energy efficiency technologies on City, other agency, residential, and commercial buildings.
3. Minimize the use of nonrenewable, polluting transportation fuels.
4. Strive for energy independence as a City.



Other goals in the Sustainable City Plan would also lead to more efficient use of energy through reducing water use, encouraging walkability, and promoting reduction of waste production. The implementation programs in the Housing Element and goals and policies in the Sustainable City Plan would ensure that energy is being used efficiently and would not lead to wasteful or inefficient use of energy. Therefore, the impact would be **less than significant**.

The HMAP includes actions, such as new monitoring systems, that may result in energy consumption. However, the Sustainable City Plan contains policies, as described above, to minimize energy consumption. These actions are not of the magnitude or type to result in wasteful or inefficient energy use. Therefore, the impact would be **less than significant**.

8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	

The existing layout of the City locates residential and commercial uses relatively close to one another and, in some instances, residential uses co-exist with commercial uses. Specific development projects are not contemplated within the update to the Housing Element. The implementation programs would change some development standards and remove barriers to, or encourage the construction or redevelopment of, additional residential units, but they do not modify existing land use or allow for heavy industrial uses or other types of facilities that would generate substantial hazardous material risks.

Generally, hazardous materials associated with residential use include use of household pesticides, fertilizers, paints, petroleum products, and similar household chemicals. An increase in residential units within the City would not create a substantial hazard due to hazardous materials transport, use, or disposal. Additionally, all hazardous material handling, transport, use, or disposal is regulated through federal, state, and local laws. The Safety Element of the General Plans contains Goal S6, which is “To ensure that the health, safety, and general welfare of residents, visitors, and the overall natural environment is protected to the maximum extent feasible from harmful exposure to hazardous materials” and includes Policies S 6.1 through S 6.6 to implement the goal. Any use of hazardous materials would be required to adhere to all regulations and policies, which would minimize the potential for hazards to the public. Therefore, a **less than significant impact** regarding the use, transport, or disposal of hazardous materials would result.

The HMAP includes two individual mitigation strategies specific to hazardous material safety and hazard prevention. One mitigation strategy is to continue to coordinate with and support the Los Angeles County Certified Unified Program Agency and the Los Angeles County Fire Department and their Health & Hazardous Materials Division in carrying out inspections, emergency response, enforcement, and site mitigation oversight of hazardous materials and waste. The second mitigation strategy is to conduct outreach to City residents on how to properly store and secure hazardous materials to avoid spillage during a hazard event. The HMAP does not include a specific project that would have the potential to create such hazards. The mitigation strategies included in the HMAP would serve to further protect and guard against risk from hazardous materials. **No impact** regarding use, transport, or disposal of hazardous materials would result.



b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
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As described above for 8a, the implementation programs of the Housing Element may result in the development of additional residential units in the City, but they would not modify existing land uses or allow for heavy industrial-type development that would generate increased hazardous materials risks. Additional residential units could generate an increase in the use of typical residential chemicals and other household hazardous materials, but this would not be of the scale or magnitude to create a significant hazard regarding an accidental release of hazardous materials into the environment. Additionally, the handling, transport, use, disposal, and storage of hazardous materials are regulated through federal, state, and local laws. Any use of hazardous materials would be required to adhere to all regulations and policies, which would minimize the potential for release into the environment. For these reasons, a **less than significant impact** regarding the release of hazardous materials into the environment as a result of the Housing Element would result.

As detailed in 8a above, the HMAP includes two individual mitigation strategies specific to hazardous material safety and hazard prevention. The HMAP does not include a specific project that would have the potential to result in an accidental release of hazardous materials into the environment. Additionally, the mitigation strategies included in the HMAP would serve to further protect and guard against hazards from hazardous materials. Thus, **no impact** regarding the release of hazardous materials into the environment would result.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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As described above for 8a, the implementation programs of the Housing Element may result in the development of additional residential units in the City and possibly within 0.25 mile of a school, but would not modify existing land uses or allow for heavy industrial-type development that would generate increased hazardous materials risks. Additional residential units could generate an increase in the use of typical residential chemicals and other household hazardous materials, but this would not be of the scale or magnitude to create a significant hazard regarding release of hazardous materials. Additionally, schools and residential land uses are typically considered compatible and desirable, and the typical residential use of hazardous materials is not considered a substantial risk to schools. Additionally, the handling, transport, use, disposal, and storage of hazardous materials are regulated through federal, state, and local laws. For these reasons, a **less than significant impact** regarding hazardous materials near a school would result with implementation of the Housing Element.

As detailed in 8a above, the HMAP includes two individual mitigation strategies specific to hazardous material safety and hazard prevention. The HMAP does not include a specific project that would have the potential to result in the release of hazardous materials near a school. Additionally, the mitigation strategies included in the HMAP would serve to further protect and guard against hazards from hazardous materials. Thus, **no impact** regarding the release of hazardous materials near a school would result.



d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
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The City contains sites that have been contaminated by the release of hazardous substances into the soil or groundwater, including sites containing leaking underground storage tanks, voluntary cleanup sites, and small-quantity generators of hazardous waste. Although no individual development project is contemplated by the Housing Element, the implementation program could result in the development or redevelopment of additional residential units, potentially on a hazardous materials site. Current federal, state, and local regulations require remediation and cleanup of such sites before development can take place. Policy S 6.5 of the Safety Element requires proponents of projects in known areas of contamination to perform comprehensive soil and groundwater contamination assessments and, if contamination exceeds regulatory action levels, requires the proponent to undertake remediation procedures prior to grading and development (City of Beverly Hills 2010d). Mandatory adherence to federal, state, and local regulations requiring the adequate cleanup of contaminated sites would minimize potential risks from development of a hazardous materials site. Thus, implementation of the Housing Element would result in a **less than significant impact** regarding development on a hazardous materials site.

As detailed in 8a above, the HMAP includes two individual mitigation strategies specific to hazardous material safety and hazard prevention. The HMAP does not include a specific project that would have the potential to be located on a hazardous materials site. Additionally, the mitigation strategies included in the HMAP would serve to further protect and guard against hazards from hazardous materials. Thus, **no impact** regarding development on a hazardous materials site would result from implementation of the HMAP.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
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The City is not within any airport land use plan or within 2 miles of a public use airport. The nearest public airport is Los Angeles International Airport, approximately 7 miles south of the City limits. Therefore, there would be **no impact** regarding safety hazards from an airport with implementation of either the Housing Element or HMAP.

f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
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There are no existing private airstrips within or adjacent to the City. Therefore, there would be **no impact** regarding safety hazards from a private airstrip with implementation of either the Housing Element or HMAP.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
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The Beverly Hills Office of Emergency Management published a Hazard Mitigation Plan in 2004 (the 2010–2015 update to which is being considered as part of this project and environmental analysis). As part of the strategies identified in the 2004 Hazard Mitigation Plan, there is an evacuation plan for the North End of the City to address a wildland–urban interface fire. Also, multi-hazard evacuation plans were completed in 2009 (City of Beverly Hills 2010e). In addition, as part of its aggressive outreach campaign, the City mails to residents the “Operation Evacuation” brochure to help every resident of the City, especially those who live in the Santa Monica Mountains in the canyon regions of Beverly Hills, learn how to help save their lives and property in case of a fire.

Although no specific development project is considered at this time, development of additional residential units could result from implementation programs of the Housing Element. As detailed in 13a Population and Housing, implementation of the Housing Element would not generate substantial new local population that would add to congestion during evacuation operations. Some resulting new resident population would be expected throughout the City, but would not be a significant enough amount to create substantial new traffic volumes of the magnitude to interfere with evacuation plans. Existing evacuation plans would be applicable to any new residential units. Additionally, any major development project would be required to consult with the Office of Emergency Management to address project-specific impacts as they relate to potential impacts with the City’s emergency mitigation and operations plan. For these reasons, implementation of the Housing Element would result in **less than significant impacts** to emergency response and evacuation plans. magnitude

The HMAP includes a mitigation strategy specific to emergency evacuation. The mitigation strategy related to fire hazards would develop an evacuation route and material to educate the public about which route to take during a disaster. The HMAP does not include a specific project that would have the potential to interfere with evacuation response or plans. Thus, **no impact** regarding impairment of emergency response or evacuation plans would result with implementation of the HMAP.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	
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Figure S1 of the Safety Element shows that the entire northern portion of the City is within a Very High Fire Severity Hazard Zone (City of Beverly Hills 2010d). Although no individual development project is contemplated by the Housing Element, the implementation program could result in the development or redevelopment of additional residential units, potentially within the high fire hazard zone in the northern portion of the City. The Housing Element would not change land use or allowable development areas. Residents in new or redeveloped residential units in the northern portion of the City would be exposed to the same level of wildland fire risk as current residential development in the area.

The City maintains fire prevention and suppression plans and programs to prepare for and mitigate potential fire hazards. Mutual aid agreements with other agencies allow for increased equipment and staffing in emergencies. In addition, the City’s Fire Code includes standards for building construction, renovations, and additions, and for the maintenance and clearance of vegetative growth. The Safety Element of the General



Plan includes three goals specific to fire safety: Goal S1 addresses protection of human life and property from the risks of wildfires and urban fires; Goal S2 addresses an efficient, well-equipped, and responsive fire department that offers maximum feasible personal safety and protection from loss of life and property caused by wildfires and urban fires; and Goal S3 requires all development to address the provision of fire protection in a proactive and preventive manner (City of Beverly Hills 2010d). Required adherence to the City’s Fire Code and the Safety Element goals and associated policies addressing fire safety would minimize potential hazards from wildland fires. For this reason, a **less than significant impact** regarding the exposure of people to risk from wildland fires would result with implementation of the Housing Element.

The HMAP includes a section devoted to mitigation strategies related to fire prevention and preparedness. Mitigation strategies specific to fire prevention and preparedness include the following: update existing City codes; increase water pressure and access to water in Zone 9 near Coldwater Canyon; educate residents regarding the potential fire hazards of wood roofs; educate the community about Firewise and Waterwise plants; develop public education material regarding vegetation management around homes; revise the Zoning Code to reflect General Plan permitted uses and development standards; design driveways and roadways to maintain Fire Department access; develop and educate residents about a Citywide evacuation route; and evaluate and implement recommendations of the Firewise Communities Program. These strategies will aid in reducing potential hazards and risk from wildland fires in the City; thus, **no impact** would result with implementation of the HMAP regarding exposure of people to wildland fires.

9. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?			X	

Construction and operation of new residential units that may be developed as a result of the implementation programs of the Housing Element would have the potential to generate polluted runoff and create additional volumes of wastewater. However, all development would be subject to applicable regulations and requirements that serve to protect water quality and minimize water quality degradation. For example, Title 9, Chapter 4, Section 5 of the Municipal Code addresses storm water and urban runoff pollution control. Specifically, Section 9-4-506 of the Municipal Code requires urban runoff and storm water mitigation plans for new development and redevelopment projects. Development that would disturb more than .1 acre would be subject to the General Construction Permit issued by the RWQCB that requires preparation of a Storm Water Pollution Prevention Plan and implementation of best management practices. Waste discharge requirements may also include the Municipal Stormwater National Pollutant Discharge Elimination System (NPDES) Permit, which was designed to be protective of water quality. Additionally, the Conservation Element of the General Plan includes Goal CON 7, which addresses a wastewater collection and treatment system that supports existing and planned development (City of Beverly Hills 2010f).

The City discharges wastewater to the Los Angeles Hyperion Wastewater Treatment Plant, which provides secondary treatment to wastewater and dry-weather storm water within its service area. The Hyperion Wastewater Treatment Plant has an available capacity of about 110 MGD (City of Los Angeles Storm Water Program 2011). Any wastewater discharge associated with new residential development would be accommodated through the existing wastewater facilities.



Compliance with the Municipal Stormwater NPDES Permit requirements, the City's Municipal Code (specifically Section 9-4-506 pertaining to urban runoff mitigation plans), the General Construction Permit, and policies included in the General Plan, would reduce the risk of water quality degradation from new or redevelopment to the maximum extent practicable. For this reason, the amendment would not violate any water quality standard or waste discharge requirement, and impacts would be **less than significant**.

The HMAP does not include mitigation strategies specific to water quality issues, and it does not include actions that could adversely affect water quality or water discharge. Thus, **no impact** would result.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
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The City provides for protection of groundwater supplies through multiple regulations. The Municipal Code regulates the use of groundwater and dewatering activities in Title 9, Chapter 4, Article 6. The Conservation Element of the General Plan includes a goal and associated policies that address groundwater. Goal CON 6 establishes a system that recharges groundwater resources (City of Beverly Hills 2010f).

The City is almost entirely built-out with urban uses and has extensive impervious surfaces. Due to the urban nature of the City, the new residential development associated with the Housing Element would create only minimal increases in impermeable surfaces because, in most cases, existing impervious areas would be replaced with new impervious areas, as there is very minimal vacant property with pervious surfaces available for development. Therefore, groundwater recharge would not be affected, as there would be only a minimal potential increase in impervious surfaces. The new residential units would result in an increase in water demand. However, the majority of water supply is obtained through imported water, and implementation of the Housing Element would not necessitate increased production of water supply from local groundwater resources. For these reasons, along with compliance with regulations addressing groundwater, the potential impact to groundwater supply or recharge would be **less than significant**.

The HMAP does not include mitigation strategies specific to groundwater, and it does not include actions that could impact groundwater supply or recharge. Thus, **no impact** would result.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			X	
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The Housing Element does not contain policies that would change land use patterns or the allowable development areas. There are no streams or rivers that pass through or are immediately adjacent to the City.



The City does not discharge to a water body that would be susceptible to erosion and siltation caused by alteration of drainage properties, as runoff is directed into storm water drainage facilities.

Drainage patterns in the City are well established due to the highly urbanized and generally built-out condition of the City. The construction of new residential development would most often occur on properties with existing urban development, and would not substantially change the drainage pattern of a site in a manner that could lead to increased erosion or siltation. For these reasons, implementation of the Housing Element and associated new residential development would result in a **less than significant** impact regarding the alteration of drainage patterns.

The HMAP does not include mitigation strategies specific to drainage patterns, and it does not include actions that could alter drainage patterns of an area. Thus, **no impact** would result.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
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As described for 9c above, construction of new residential units through implementation of the Housing Element would not substantially alter the drainage pattern due to factors such as the highly urban and built-out nature of the City and the likely development of new residential uses on existing urbanized properties. Additionally, as described for 9b above, there is very minimal vacant property with pervious surfaces available for development. Thus, a minimal increase in surface runoff is anticipated with development of new residential units because in most cases existing impervious areas would be replaced with new impervious areas. For these reasons, the Housing Element would not result in on- or off-site flooding due to the alteration of drainage patterns or increased surface runoff, and the impact would be **less than significant**.

The HMAP does not include mitigation strategies specific to drainage patterns or surface runoff, and it does not include actions that could substantially alter either of these issues. Thus, **no impact** would result.

e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
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The City is almost entirely built-out with urban uses and has extensive impervious surfaces. Due to the urban nature of the City, the new residential development associated with the Housing Element would result in minimal increases in impermeable surfaces because, in most cases, existing impervious areas would be replaced with new impervious areas. Thus, the change in quantity of storm water runoff associated with new residential development would be minor and would not contribute substantially to existing or planned storm water drainage systems.

In most cases, it is likely that new or redeveloped residential units resulting from implementation of the Housing Element would occur on existing impervious areas that are already generating runoff. Residential



development can result in polluted runoff from the use of lawn fertilizers, pesticides, oil, grease, and other chemicals associated with vehicles. Title 9, Chapter 4, Section 5 of the Municipal Code addresses storm water and urban runoff pollution control. Specifically, Section 9–4–506 of the Municipal Code requires urban runoff and storm water mitigation plans for new development and redevelopment projects, and provides requirements for construction projects to minimize polluted runoff. The Conservation Element of the General Plan provides goals to address polluted storm water runoff. Goal CON 10 addresses a storm drainage system that reduces pollutants from entering the ocean, CON 11 addresses the provision of a storm drainage system that does not degrade the quality of surface waters or groundwater systems, and CON 12 addresses a storm drainage system that minimizes the amount of toxicity of discharge into the system (City of Beverly Hills 2010f). Any residential development resulting from implementation of the Housing Element would be required to comply with these goals and the associated policies. Compliance with codes and policies addressing runoff would minimize the potential for substantial new sources of polluted runoff to result from implementation of the Housing Element. Thus, a **less than significant impact** would result.

The HMAP does not include strategies specific to surface runoff, and it does not include actions that could substantially alter runoff volumes or quality. Thus, **no impact** would result.

f) Otherwise substantially degrade water quality?			X	
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Common sources of groundwater contamination during construction include earth–disturbing activities, such as trenching for underground utilities and pile driving for foundations. These activities could penetrate the water table and potentially result in minor groundwater contamination. Compliance with the City’s Municipal Code, specifically Sections 9–4–601 and 9–4–611, would ensure that earth–disturbing activities would not result in adverse groundwater conditions.

Another source of groundwater contamination is from spillage resulting from improper handling or storage of hazardous materials used during construction, which could contaminate surface water or percolate into the groundwater. Careful monitoring of construction activities to ensure compliance with the Construction General Permit and Municipal Code Section 9–4–507 requirements would ensure that groundwater degradation during construction is not substantial. For these reasons, construction of residential units in association with the Housing Element would not substantially degrade water quality, and a **less than significant impact** would result.

The HMAP does not include mitigation strategies specific to water quality issues, and it does not include actions that could adversely affect water quality. Thus, **no impact** would result.

g) Place housing within a 100–year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?				X
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The City of Beverly Hills is not located within a 100–year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map (FEMA 2008). Therefore, there would be **no impact** resulting from implementation of either the Housing Element or the HMAP regarding the placement of housing in a designated 100–year flood hazard area.



h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
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The City is not located within a 100-year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map (FEMA 2008). As described in the HMAP, the City previously had two locally designated areas with flooding conditions in the southeast sector. However, the Los Angeles County Department of Public Works in 2005 completed a massive storm water relief upgrade to the Hollyhills Unit 7 drainage system, and the City has not experienced flooding in this area since this project was completed (City of Beverly Hills 2011b). Because this area is no longer subject to flooding, one mitigation strategy proposed in the HMAP is to remove the locally designated flood ordinance from the Municipal Code. Any new residential development located within these flood hazard areas would not redirect or impede flood flows, as this area is no longer prone to flooding and the designations simply have not been removed from the City ordinance yet. Therefore, any impacts associated with placing structures that would impede or redirect flood flows as a result of the Housing Element would be **less than significant**.

The HMAP does not include mitigation strategies specific to the placement of structures in a flood hazard area. As described in the paragraph above, one mitigation strategy is to remove the locally designated flood ordinance from the Municipal Code, as the designated areas are no longer subject to flooding. Thus, **no impact** would result.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	
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The Greystone Reservoir is considered by the State Department of Water Resources a reservoir and dam. The drinking water reservoir is a concrete structure partially below ground with a capacity of 19 million gallons. It is inspected by the state annually. The Greystone Reservoir is located in the lower Trousdale Estates area, north of Sunset Boulevard. If the reservoir were to fail, the escaping water would flow in a southerly direction. The inundation area would include Doheny Road and Foothill Road to the west, Doheny Drive to the east, and Sunset Boulevard and Santa Monica Boulevard, the termination point, to the south. The City also has 10 above- and partially below-ground storage reservoirs. Some of these reservoirs are located in the proximity of residential structures, which could be adversely impacted by the discharge of escaping water in the event of structural failure. Because reservoir failure can have severe consequences, FEMA requires that all reservoir owners develop Emergency Action Plans (EAP) for warning, evacuation, and post-flood actions. Although there may be coordination with county officials in the development of the EAP, the responsibility for developing potential flood inundation maps and facilitation of emergency response is the responsibility of the reservoir owner (City of Beverly Hills 2011b).

The City of Beverly Hills also lies in the inundation path of the Lower Franklin Canyon Dam, which is located north of the City. The Lower Franklin Reservoir has a 200 acre-feet capacity and can be drained to half capacity in 72 hours and completely emptied in 216 hours. Dams with significant hazard potential are



“those dams where failure [breach] or misoperation [unscheduled release] would result in no probable loss of human life but can cause economic loss, environmental damage, and disruption of lifeline facilities or can impact other concerns” (FEMA 2004). In the event of a breach of the Lower Franklin Reservoir, the residential area north of Carmelita Drive would be exposed to immediate and severe danger. Below that point, the danger diminishes rapidly, although flooding of most structures in this section of the inundation path would occur. Approximately 1,200 people live in the sector of the inundation area subject to severe danger, and provision for evacuation of this population is required in the event of a breach in the structure (City of Beverly Hills 2009b). This reservoir, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure.

The City provides specific goals and policies addressing protection from flood hazards in the Safety Element. Goal S 4 is to reduce the potential of flood hazards to human life and property. Specifically, Policy S 4.1 requires that new development incorporate sufficient measures to mitigate flood hazards and S 4.5 requires the development and maintenance of a program for periodically assessing, monitoring, and maintaining the structural integrity of reservoirs (City of Beverly Hills 2010d).

Although there is the potential for flooding to result in portions of the City where new residential development might occur as a result of implementation of the Housing Element, the risk is not considered to be significant, as all areas of the City are generally built-out and subject to these same flooding hazards that could result from dam or reservoir failure. Thus, potential flooding impacts to new residential development would be **less than significant**.

The HMAP includes strategies to reduce flooding impacts, including updating the City’s Urban Water Master Plan and Capital Improvement Program, adopting state-of-the-art water monitoring systems, and continuing to implement existing flood mitigation activities and programs. No actions associated with the mitigation strategies would result in exposure of people or structures to flooding hazards, and **no impact** would result.

j) Inundation by seiche, tsunami, or mudflow?			X	
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Development in Beverly Hills is subject to hazards associated with seiche, tsunami, and mudflow. A seiche is a wave generated on the surface of a landlocked body of water, such as a lake, reservoir, or swimming pool. A tsunami is a great sea wave produced by submarine earth movement or volcanic eruption. Seiches and tsunamis are known to occur following earthquakes.

As described above, there are numerous reservoirs that could potentially result in a seiche wave and potentially result in damage to nearby properties; however, this is not anticipated to be substantial. The City is located 6 miles east of the Pacific Ocean and, at the lowest point, is 120 feet above median sea level along Olympic Boulevard (City of Beverly Hills 2011b). As described in the HMAP, a tsunami has never occurred within the City. Although the City enjoys a close proximity to the ocean, there is no record of a tsunami or repercussions from a tsunami. State modeling data shows that the City would sustain no water if a tsunami hits the Southern California coast, which would have little to no affect on the City (City of Beverly Hills 2011b). Due to the City’s distance from the ocean and its elevation, there would be little to no risk of flooding from a tsunami.



Mudflows are often triggered by periods of heavy rainfall. Topography of the City is greatly influenced by the Santa Monica Mountains and the Los Angeles Coastal Basin. Hillside areas north of Sunset Boulevard are characterized as rugged topography with steep-sided ridges and narrow ravines, and these areas have the highest potential of landslide. Areas south of Sunset Boulevard are flat with a mild slope approximately 2 to 3% in the south-southwest direction, and these areas have little or no danger of landslide (City of Beverly Hills 2011b). Building codes require adequate design and engineering to minimize the potential for unstable soils that could contribute to a mudslide, and the Conservation Element of the General Plan includes Goal CON 24, which addresses the creation of new hazards from unwise grading and drainage procedures, and specifically includes Policy CON 24.1, which requires all of the recommendations of geologists to be incorporated into the construction plans prior to issuance of a building permit. With adherence to these measures and building code requirements, potential impacts from unstable soils that could result in mudslides would be minimized.

Based on the location of development of residential units within the City, there could be a potential for impacts from a seiche or mudflow; however, a seiche from a local reservoir is not anticipated to be of substantial magnitude, and potential mudslide impacts are minimized through adherence with building codes and General Plan policies. Thus, a **less than significant impact** from inundation from seiche, tsunami, or mudslide would result with implementation of the Housing Element.

The HMAP does not include mitigation strategies specific to inundation by seiche, tsunami, or mudslide, and includes no actions that would result in impacts from these events. Thus, **no impact** would result.

k) Would the proposed project require or result in the construction and/or expansion of new storm drain infrastructure that would cause significant environmental effects?			X	
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The City is almost entirely built-out with urban uses, and has extensive impervious surfaces. Due to the urban nature of the City, new residential development associated with the Housing Element would create only minimal increases in impermeable surfaces because, in most cases, existing impervious areas would be replaced with new impervious areas. Thus, the quantity of storm water runoff associated with new residential development would be extremely minor and would not contribute substantially to existing storm drain facilities. Because most of the City is built-out with urban uses, residential development resulting from the Housing Element would use existing storm drain infrastructure. The Conservation Element of the General Plan includes goals and policies, specifically CON 10, to address maintenance of the storm drain system (City of Beverly Hills 2010f). Implementation of the Housing Element would not necessitate new storm drain infrastructure that could cause a significant environmental effect, and a **less than significant impact** would result.

The HMAP does not include mitigation strategies specific to surface runoff or storm drain infrastructure, and it does not include actions that could result in the need for new or expanded storm drain facilities. Thus, **no impact** would result.



<b>10. LAND USE AND PLANNING.</b> Would the project:				
a)	Physically divide an established community?			X

The Housing Element includes implementation programs that would change some development standards and remove barriers to, or encourage the construction or redevelopment of, additional residential units, but it would not modify land use or allowable development areas. There are no specific projects contemplated that could result in land use changes or other development, such as extensions of roadways, that could result in the physical division of the established community. Rather, the Housing Element details programs that the City intends to implement as a means to encourage more affordably priced housing in the City and to ensure that the community's housing needs are met. The updated Housing Element is consistent with the policies and programs set forth in the adopted General Plan. Because there would be no land use changes with implementation of the Housing Element, and no projects that could result in large development features that could result in the physical division of the established community, the impact would be **less than significant**.

The HMAP does not include changes to land use or allowable development areas, and does not propose actions that would necessitate development that could physically divide an established community. Thus, **no impact** would result.

b)	Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X
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The Housing Element update is prepared in response to the RHNA requirement to develop local housing programs to meet the City's "fair share" of existing and future housing needs for all community members, as determined by the jurisdiction's Council of Governments. As stated in the project description, the updated Housing Element is consistent with the policies and programs set forth in the adopted General Plan. All development resulting from the implementation programs of the Housing Element would be required to adhere to applicable plans, policies, and regulations of agencies with jurisdiction over the project. Therefore, implementation of the Housing Element would not conflict with applicable land use plans, and a **less than significant impact** would result.

The HMAP does not include changes to land use or allowable development areas, and does not propose actions that would have the potential to conflict with an applicable land use planning document. Thus, **no impact** would result.

c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?			X
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The City does not have any habitat conservation or natural community conservation plans. Additionally, as described under the Biological Resource analysis, Section 4 of this Initial Study, the City does not contain any significant habitat capable of supporting sensitive species or any significant ecological areas. A majority of the City has been developed with impervious urban surfaces or landscaped, and is generally void of natural



vegetation. Because there are no applicable habitat conservation plans or natural community conservation plan, implementation of the Housing Element would have **no impact** regarding conflicts with these types of plans.

Similarly, because there are no applicable habitat conservation plans or natural community conservation plan, implementation of the HMAP would have **no impact** regarding conflicts with these types of plans.

<b>11. MINERAL RESOURCES.</b> Would the project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			X

The State Mining and Geology Board (SMGB) classifies significance of mineral resources in accordance with the California Surface Mining and Reclamation Act of 1975 using a system that classifies land into one of four possible Mineral Resources Zones (MRZ) based on quality and significance of mineral resources (California Department of Conservation, n.d.). As shown in Figure CON 4 of the Conservation Element of the General Plan, the City has areas classified as MRZ-1 and MRZ-3 (City of Beverly Hills 2010f). MRZ-1 is defined as areas where adequate geologic information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence. MRZ-3 is generally defined as areas of known or inferred mineral occurrence (California Department of Conservation, n.d.).

Oil and gas deposits are not considered “minerals”; however, a summary of impacts to oil and gas production has been provided because the City is within a region underlain by oil deposits. As shown in Figure CON 5 of the Conservation Element of the General Plan, the City is located on the San Vicente, Beverly Hills, Salt Lake, and South Salt Lake Oil Fields, which actively produce oil and natural gas (City of Beverly Hills 2010f). The Conservation Element of the General Plan has two policies aimed at ending oil and gas extraction operations within the City. Policy CON 21.1 prohibits new drill sites in new locations within the City for production of oil, gas, or other hydrocarbon substances, and Policy CON 21.2 seeks to develop a plan to phase out existing oil drilling sites as soon as practicable. The Housing Element may result in the development of additional residential units, but it does not propose any land use changes or modifications to allowable development areas and would not impede or conflict with General Plan policies to end oil or gas extraction within the City.

The City is located in a highly urbanized area and is almost completely built-out; therefore, any potential to access and extract mineral resources, such as gravel and sand, is severely limited. Implementation of the Housing Element would not change land use or the allowable development areas; thus, the Housing Element would not create urban expansion or other irreversible land uses that would preclude mineral extraction. For these reasons, the development of additional residential units as a result of implementation of the Housing Element within the existing developed areas of the City would not cause the loss of availability of a known mineral resource, and a **less than significant impact** would occur.

Similarly, the HMAP does not include changes to land use or allowable development areas, and does not propose actions that would have the potential to cause the loss of availability of a known mineral resource; a **less than significant impact** would occur.



b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X
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The General Plan and other land use plans do not designate any locally important mineral resource recovery sites within the City. Thus, neither the Housing Element nor HMAP would result in the loss of availability of a locally important mineral recovery site as delineated on a land use planning document; **no impact** would result.

**12. NOISE.** Would the project result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
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Development of additional residential projects in response to implementation programs of the Housing Element may require construction activities and the use of heavy equipment for demolition, site excavation, site grading, paving, and building fabrication. During each stage of construction there would be a different mix of equipment operating, and noise levels would vary based on the nature of the project, the amount of equipment in operation, and the location of the activity. Specific development is not contemplated; however, there is the potential that future construction activities as a result of the implementation programs of the Housing Element could be in proximity to sensitive noise receptors, such as adjacent residential dwellings. After construction, new residential units would be similar to the existing urban residential uses and not expected to generate substantial new noise sources that might exceed applicable standards. Traffic generated by the addition of residential units in various locations throughout the City would not be of the scale or magnitude to substantially increase noise levels.

The Noise Element of the General Plan serves to ensure that City residents are protected from excessive noise. Goals of the Noise Element are to minimize land use conflicts between various noise sources and other human activities, minimize motor vehicle traffic noise impacts on sensitive noise receptors, minimize non-transportation-related noise impacts on sensitive noise receptors, and minimize excessive construction-related noise (City of Beverly Hills 2010g). To achieve these goals, the Noise Element contains policies intended to reduce the potential exposure of sensitive receptors to noise-related impacts. Additionally, the City Noise Ordinance, detailed in Section 5-1-206 of the City's Municipal Code, states that no construction that requires a City permit can occur between 6 p.m. and 8 a.m. of any day, or at any time on a Sunday or a public holiday unless the project has been issued an after-hours construction permit. In addition, no person can engage in such work within a residential zone, or within 500 feet of a residential zone, at any time on a Saturday unless such person has been issued an after-hours construction permit. Adherence to these policies, as well as compliance with the City Noise Ordinance, would ensure that potential impacts to sensitive receptors due to exposure to noise levels that exceed the established local standards are minimized. The Housing Element would not modify existing land uses or developable areas, thus it would not result or cause incompatible noise-sensitive land uses. For these reasons, potential construction and operation noise generated by additional residential units would not expose people to noise levels in excess of established standards, and



impacts would be **less than significant**.

The HMAP does not include changes to land uses or allowable development areas, and does not propose actions that would have the potential to generate substantial noise levels in excess of applicable standards. Any potential actions as a result of the HMAP would be subject to the noise regulations and policies described above. Thus, implementation of the HMAP would not expose people to noise levels in excess of established standards, and a **less than significant impact** would result.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
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Potential sources of groundborne vibrations include construction activities such as pile driving, concrete demotion, rock breaking, and blasting. The construction of new residential units as a result of the Housing Element would require construction activity that is assumed to be typical of urban development, and would not create excessive groundborne vibration or groundborne noise levels. Additionally, any construction activity that might cause groundborne vibrations would be short in duration, lasting only the length of time necessary to complete the construction task. For these reasons, implementation of the Housing Element would not expose people to excessive groundborne vibration or groundborne noise, and a **less than significant impact** would result.

The HMAP does not propose actions that would have the potential to generate excessive groundborne vibrations or groundborne noise levels. Additionally, if any construction activity were to occur as a result of the HMAP that could cause groundborne vibrations, it would be short in duration, lasting only the length of time necessary to complete the construction task. Thus, implementation of the HMAP would not expose people to excessive groundborne vibration or groundborne noise, and a **less than significant impact** would result.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
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Ambient noise levels within the City are generally dominated by vehicular traffic on adjacent roadways. There are also many stationary noise sources such as restaurant, bar, and entertainment establishments; operation of mechanical equipment; active recreational facilities; and other human activity throughout the City (City of Beverly Hills 2010g). The permanent operation of additional residential units as a result of implementation programs of the Housing Element, such as density bonus units or second units, would generate typical noise associated with a residential dwelling. A larger senior living facility may generate slightly higher noise levels due to additional traffic in the local vicinity; however, an increase in vehicle traffic from this type of facility would not be on the scale or magnitude to cause substantial increases in the ambient traffic noise. Additionally, as described in 12a, any new development or redevelopment would be subject to noise regulations of the Noise Element of the General Plan and City Noise Ordinance. For example, the City Noise Ordinance places restrictions on noise levels from air conditioning and other machinery, as detailed in Section 5-1-202 of the City's Municipal Code. Conformance to these noise policies and ordinances would ensure that potential noise generated by the residential units is minimized. Therefore, development of new residential units in association with the Housing Element would not create substantial permanent increases in ambient noise levels, and would result in a **less than significant impact**.



The HMAP does not propose actions that would have the potential to generate substantial noise levels in excess of applicable standards. Any potential actions as a result of the HMAP would be subject to the noise regulations and policies described above. Thus, implementation of the HMAP would not create substantial permanent increases in ambient noise levels, and a **less than significant impact** would result.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
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As detailed in 12a, development of additional residential projects in response to implementation programs of the Housing Element may require construction activities that could temporarily increase ambient noise levels. Specific development is not contemplated; however, there is the potential that future construction activities as a result of the implementation programs of the Housing Element could be in proximity to sensitive noise receptors such as adjacent residential dwellings. Construction of new or redeveloped residential units, including individual units or larger senior living communities would generate noise typical of construction activities that currently occur throughout the City. These temporary construction activities would be subject to all noise-related policies of the General Plan and the City Noise Ordinance, as detailed above. Adherence to these policies and ordinances would ensure that potential temporary increases in noise levels would not be substantial or excessive. For these reasons, potential temporary increases in noise levels due to construction of additional residential units would not be considered substantial and impacts would be **less than significant**.

The HMAP does not propose actions that would have the potential to generate substantial temporary noise levels. Any potential actions as a result of the HMAP would be subject to the noise regulations and policies described above. Thus, implementation of the HMAP would not create substantial temporary increases in ambient noise levels and a **less than significant impact** would result.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
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The City is not in the vicinity of any commercial airport nor is any area of the City within an airport land use plan. Thus, implementation of the Housing Element or the HMAP would not expose people residing or working in the City to excessive noise levels related to airport operations and **no impact** would result.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X
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There are no private airstrips in the vicinity of the City. Thus, implementation of the Housing Element or the HMAP would not expose people residing or working in the City to excessive noise levels related to private airstrip operations and **no impact** would result.



13. POPULATION AND HOUSING. Would the project:			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X

The City has a total population of more than 34,000 people and more than 15,700 housing units (City of Beverly Hills 2011c). The numeric objective for housing production to meet the RHNA requirement is 554 residential units. The addition of residential units to the City could result in an increase in the population of the City. However, one purpose of the Housing Element is to address the current shortfall of affordable housing in response to anticipated growth in the City and region. Additionally, it is likely that some future residents of the new housing units that would result from implementation of the Housing Element already reside within the City (such as a family member who currently lives within homes that may construct a second unit on their property for that family member). Although implementation of the Housing Element would likely cause some population growth within the City due to new residential units, this resulting increase in population would not be substantial for the reasons outlined above and in relation to the existing population of the City and anticipated future growth that would occur with or without the new residences. No indirect population growth would result, as the Housing Element does not propose any projects that could induce population increases such as extension of roads or infrastructure. Thus, implementation of the Housing Element would likely cause some population growth, but this growth would not be substantial and a **less than significant impact** would result.

The HMAP does not include actions or policies that would affect population growth within the City. For this reason, **no impact** would result from implementation of the HMAP regarding substantial population growth.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?			X
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While Housing Element implementation programs may result in the demolition of some existing residential units, those units would be replaced with new or redeveloped housing in an effort to achieve the RHNA housing requirements of 554 additional residential units. The purpose of the Housing Element is to detail programs that the City intends to implement as a means to encourage more affordably priced housing in the City and to ensure that the community's housing needs are met. Thus, the Housing Element would serve to facilitate the provision of more residential units in the City and would not displace a substantial number of existing housing units or necessitate construction of replacement housing elsewhere; a **less than significant impact** would result.

The HMAP does not include actions or policies that would displace housing or necessitate the construction of replacement housing elsewhere. For this reason, **no impact** would result.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?			X
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Similar to the discussion above in 13b, Housing Element implementation programs may result in the demolition of some existing residential units and displace existing residents. Those units would be replaced with new or redeveloped housing in an effort to achieve the RHNA housing requirements of 554 additional residential units. Thus, the Housing Element would serve to facilitate the provision of more residential units in the City and would not displace a substantial number of people or necessitate construction of replacement housing elsewhere. Therefore, a **less than significant impact** would result.

The HMAP does not include actions or policies that would displace people or necessitate the construction of replacement housing elsewhere. For this reason, **no impact** would result.

**14. PUBLIC SERVICES.** Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a) Fire protection?				X	
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The Beverly Hills Fire Department (BHFD) provides fire protection service for the City with three fire stations, as shown on Figure PS 1 of the Public Service Element of the General Plan. Station #1, Headquarters, is located at 445 North Rexford Drive; Station #2, Coldwater Canyon, is located at 1100 Coldwater Canyon Drive; Station #3, Doheny, is located at 180 South Doheny Drive. A comprehensive organizational and management audit of the BHFD in 2010 found that the department is currently operating at acceptable levels of fire protection services best practices, with 4-minute travel-time coverage provided to all areas of the City except the upper hillside areas (CityGate 2010).

The Housing Element would facilitate the provision of additional residential housing units within the City. The Housing Element would not modify land uses or developable areas; thus, there would be no need to expand or alter the service area protected by the BHFD. The development of new residential units would generate an increase in demand for fire protection services. However, the new residential development would occur within the existing urban area and would be a similar land use to surrounding development. Some of the development may replace existing uses that previously generated demand for fire protection or be within existing residential property, such as a second unit, which already requires fire protection needs. The increase in demand for fire protection services due to the new residential development that may occur with implementation of the Housing Element would not be of the magnitude to create substantial physical adverse impacts due to the need for new or altered facilities to maintain adequate service.

Additionally, goals and policies contained in the General Plan require that adequate infrastructure be provided as new development occurs. For example, Safety Element Goal S 2 addresses an efficient, well-equipped, and responsive fire department that offers maximum feasible personal safety and protection from loss of life and property caused by wildfires and urban fires, and Goal S 3 requires all existing and new development and redevelopment to address the provision of fire protection in a proactive and preventive manner. Policies specific to adequately assessing and responding to impacts of new development include S 3.2, S 3.3, and S 3.5. These goals and policies help to ensure that fire staffing and facilities are expanded commensurably to



adequately serve the needs of the City’s growing population and business community to maintain or enhance the City’s emergency fire response times.

Additionally, any new development would be required to comply with all applicable federal, state, and local regulations governing the provision of fire protection services, such as the California Fire Code and City Fire Code. For these reasons, additional fire service demand resulting from implementation of the Housing Element would have a **less than significant impact** on the ability of the BHFD to adequately serve the community, and would not necessitate provision of new or expanded facilities that might result in adverse environmental effects.

The strategies within the HMAP would promote sound public policy and programs designed to protect the public, critical facilities, infrastructure, private and public property, and the environment from natural and built hazards. Better advanced protection of the public and property from disasters would reduce the burden placed on fire protection services during a disaster event. For this reason, implementation of the HMAP would result in **no impact** to the provision of adequate fire protection service.

b) Police protection?			X	
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The City of Beverly Hills currently maintains a ratio of 3.8 sworn officers per 1,000 residents, but does not use a standard personnel-to-population ratio to determine optimum staffing levels because there is a significant disparity between actual resident population (approximately 36,000 residents) and the City’s daytime population (approximately 250,000 people). The agency’s main indicator of effectiveness is its response time to emergency calls. The Beverly Hills Police Department’s (BHPD) average response time is 3 minutes. Other indicators of effectiveness include the volume of calls for service and number of officers available at any given time. The BHPD is funded through general fund revenues generated by property and sales taxes, which are expected to increase in proportion to the City’s growth (City of Beverly Hills 2009b).

The Housing Element would facilitate the provision of additional residential housing units within the City. The Housing Element would not modify land uses or developable areas; thus, there would be no need to expand or alter the service area protected by the BHPD. The development of new residential units would generate a slight increase in population, resulting in an increase in demand for police protection. However, it is likely that some of the residents who would occupy the new residential developments already reside in the City, as described in the Population and Housing Section, 13a above. The increase in demand for police services due to the new residential development that may occur with implementation of the Housing Element would not be of the magnitude to create substantial physical adverse impacts due to the need for new or altered facilities to maintain adequate service. For these reasons, additional police service demand resulting from implementation of the Housing Element would have a **less than significant impact** on the ability of the BHPD to adequately serve the community, and would not necessitate the provision of new or expanded facilities that might result in an adverse environmental effect.

The mitigation strategies within the HMAP would promote sound public policy and programs designed to protect the public, critical facilities, infrastructure, private and public property, and the environment from natural and built hazards. Better advanced protection of the public and property from disasters would reduce the burden placed on police service during a disaster event. For this reason, implementation of the HMAP would result in **no impact** to the provision of adequate police service.



c) Schools?			X	
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School services are provided by the Beverly Hill Unified School District (BHUSD) and various private schools throughout the City. The BHUSD consists of four K-8 elementary schools, one 9-12 high school, and one adult school. The K-12 enrollment is approximately 4,702 (BHUSD 2011). Historic enrollment data provided in the District-Wide Five-Year Master Plan shows that, in the most recent years considered (2006-2007), enrollment at all four of the elementary schools was below capacity, and enrollment at the high school just slightly exceeded capacity. Total enrollment during that same time frame was almost 5,200 students (BHUSD 2008). The current enrollment figure of approximately 4,700 is 500 students less, and indicates a general decline in student population and a resulting increase in current school capacities.

Additional demand for school services would result with the increased residential development associated with the Housing Element. The increase in school-aged population resulting from new residential development attributable to the Housing Element would likely be lower than typically associated with residential development, as a large focus of the implementing programs is on senior living communities and would not accommodate school-aged children. As described in Section 13, Population and Housing, some of the future occupants of the new residential developments may already reside in the community and, thus, new development would not necessarily add new students to the school system. Additionally, all new development is required to pay City of Beverly Hills School Impact (Developer) fees to offset any impacts to school services.

Because BHUSD has experienced declining enrollment and is operating below the allowable capacity, the increased student population resulting from implementation of the Housing Element would create a **less than significant** impact, as students could be accommodated without the need for additional or expanded school facilities.

The HMAP does not include actions or policies that would affect the need for or use of school facilities. For this reason, **no impact** would result.

d) Parks?			X	
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The City has approximately 77 acres of developed parkland and close to 100 acres of open space area (City of Beverly Hills 2010a). With 77 acres of parkland, the City is currently deficient by approximately 15 acres of parkland, according to the state Quimby Act standard of 3 acres per 1,000 residents. The additional housing units that may result from implementation of the Housing Element and associated small increase in population would slightly increase demand for public parks. However, continued implementation of the recreation policies in the Open Space Element would serve to help minimize impacts to recreation facilities. Policies provide for the preservation and enhancement of City open space and recreational facilities, and also promote the maintenance of existing amenities and the coordination of joint use agreements to increase the amount of park space available to residents. Specifically, Policy OS 8.2, which could be applicable to a large senior living facility, requires that large developments provide on-site open space or recreational amenities accessible to the public, contribute in-lieu fees for the development of new recreation facilities or enhancement of existing facilities, or a combination of both to meet the demands generated by the development's resident population or employment base. This requirement would be over and above current



open space requirements and current park assessment fees. Goal S8 of the Open Space Element and the associated policies aim to increase parkland and recreational facilities within the City.

The slight potential increase in population that would use existing recreational facilities would not create such demand that the amount of deficient parkland acres would substantially increase. Policies in the Open Space Element provide for maintenance and enhancement of City parklands. Although no specific development is proposed with the Housing Element, as development proposals are submitted in the future the larger projects, such as a living community for seniors, these would be evaluated under Policy OS 8.2 to determine if new park space or payment of in-lieu fees would be required as part of the project. For these reasons, increased demand for and use of City parks would not cause a substantial adverse physical impact, and a **less than significant impact** would result.

The HMAP does not include actions or policies that would affect the need for or use of park facilities. For this reason, **no impact** would result.

e) Other public facilities?			X	
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The City is served by the Beverly Hills Public Library located at 444 North Rexford Drive. Additional demand for library services would result with the increased residential development associated with the Housing Element. The increase in library patrons due to the residential development would not be of the magnitude to require expansion or new library facilities. Within the Public Services Element of the General Plan, Goals PS 5, PS 6, and PS 7 address the improvement of library facilities and programs. Policy PS 5.3 would require large-scale commercial or residential projects to contribute fees for the impact that their projects would have on library facilities due to increased population or daytime traffic. As such, the amendments would not impact or create the need for additional library facilities. For these reasons, implementation of the Housing Element would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities to accommodate additional demand, and a **less than significant impact** would result.

The HMAP does not include actions or policies that would affect the use of library facilities. For this reason, **no impact** would result.

<b>15. RECREATION.</b> Would the project:				
a) Increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	

The City has approximately 77 acres of developed parkland and close to 100 acres of open space area (City of Beverly Hills 2010a). With 77 acres of parkland, the City is currently deficient by approximately 15 acres of parkland, according to the state Quimby Act standard of 3 acres per 1,000 residents. The additional housing units that may result from implementation of the Housing Element and associated small increase in population would slightly increase demand for public park and recreational services and facilities. However, continued implementation of the recreation policies in the Open Space Element would serve to help minimize impacts to recreation facilities. Policies provide for the preservation and enhancement of City open space and recreational facilities, and also promote the maintenance of existing amenities and the coordination



of joint use agreements to increase the amount of park space available to residents. Specifically, Policy OS 8.2, which could be applicable to a large senior living facility, requires that large developments provide on-site open space or recreational amenities that are accessible to the public, contribute in-lieu fees for the development of new recreation facilities or enhancement of existing facilities, or a combination of both to meet the demands generated by the development's resident population or employment base. This requirement would be over and above current open space requirements and current park assessment fees. Goal S8 of the Open Space Element and the associated policies aim to increase parkland and recreational facilities within the City.

The slight potential increase in population that would use existing recreational facilities would not create a substantial physical increase in demand for the facilities. Policies in the Open Space Element provide for maintenance and enhancement of City recreation facilities. Although no specific development is proposed by the Housing Element, larger projects that implement the Housing Element, such as senior living communities, would be evaluated under Policy OS 8.2 to determine if new recreational facilities or payment of in-lieu fees would be required. For these reasons, increased demand for and use of recreational facilities would not substantially accelerate the deterioration of existing recreational facilities, and a **less than significant impact** would result.

The HMAP does not include actions or policies that would affect the need for recreation facilities. For this reason, **no impact** would result.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	
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There are no specific development proposals included in the Housing Element. Resulting development would often be second units on existing residential properties or redevelopment of existing residential units; thus, these future projects would not include or necessitate the construction or expansion of recreation facilities. However, if a project is proposed as part of the Housing Element that is of the size to require on-site recreation facilities, such as a large senior living community, analysis of that development proposal would be required to determine any potential impacts. For these reasons, implementation of the Housing Element is not anticipated to result in impacts related to the construction or expansion of recreational facilities, and a **less than significant impact** would result.

The HMAP does not include actions or policies that would affect the use of recreation facilities. For this reason, **no impact** would result.

16. TRANSPORTATION/TRAFFIC. Would the project:				
a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X	



Beverly Hills is located along a densely developed part of the Wilshire Corridor and adjoins many heavily travelled areas. The City’s street pattern provides limited opportunities for all of the required trip demands. Since the road system was not designed for the high traffic volumes associated with current development and the complex patterns of origins, destinations, and turning movements, there is limited capability for adaptation and improvement of the existing circulation system (City of Beverly Hills 2010h). Implementation of the Housing Element would not interfere or conflict with goals and policies provided in the Circulation Element that work toward the expeditious travel of vehicles through the City and emphasize walking, bicycle riding, and public transit. The Housing Element would not change land use or the allowable development areas, and would not modify the transportation network within the City. Development resulting from the Housing Element would not be in excess of the development capacity currently available in the existing General Plan. Because no specific development project is proposed by the Housing Element, it is speculative to estimate trip generations or potential impacts to congested roadways and thresholds for acceptable roadway segment and intersection operations as established by the City or contained within the Congestion Management Program (CMP). Specific development projects would be required to undergo appropriate review once proposed. Thus, the potential impact to capacity of the circulation system would be **less than significant**.

The HMAP does include strategies for improving evacuation plans during emergency situations, but does not include actions or policies that would generate traffic that could exceed the capacity of the existing circulation system. For this reason, **no impact** would result.

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			X	
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The City of Beverly Hills is required to comply with the CMP, a state–mandated program administered by the Los Angeles County Metropolitan Transportation Authority/METRO, the regionally designated CMP agency. Section 10–7–201 of the City Municipal Code specifies compliance with the CMP for those projects requiring an EIR under CEQA. The City Council recently found the City to be in conformance with the CMP, and adopted the CMP Local Development Report in accordance with Government Code Section 65089 (City of Beverly Hills 2011d). The Housing Element would not change land use or the allowable development areas, and would not modify the transportation network within the City. Development resulting from the Housing Element would not be in excess of the development capacity currently available in the existing General Plan. Because no specific development project is proposed by the Housing Element, it is speculative to estimate trip generations or potential impacts to congested roadways and thresholds for acceptable roadway segment and intersection operations as established by the CMP. Specific development projects would be required to undergo appropriate review once proposed. Therefore, the potential impact to capacity of the circulation system would be considered **less than significant**.

The HMAP does include strategies for improving evacuation plans during emergency situations, but does not include actions or policies that would generate traffic or affect compliance with the CMP. For this reason, **no impact** would result.



c) Result in a change in air traffic patterns, including either an increase in traffic levels, or a change in location, that result in substantial safety risks?				X
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Development resulting from implementation of the Housing Element would include new or redeveloped residential units, similar to the residential development that currently exists, and would not interfere with or alter air traffic patterns in or near the City. The Housing Element contains no policies related to air travel and **no impact** would result.

The HMAP contains no strategies related to air travel and has no specific actions that could impact air traffic. Thus, **no impact** would result.

d) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment)?				X
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The Housing Element would not change transportation routes or general traffic patterns. Further, the Housing Element does not include goals or policies that would introduce new safety hazards at intersections or along roadway segments. No incompatible uses would result from the Housing Element, as it would encourage residential development similar to what currently exists and would not modify land use patterns. For these reasons, implementation of the Housing Element would have **no impact** regarding hazardous design features or incompatible uses.

Similarly, the HMAP includes no strategies that would increase hazards to a design feature or create an incompatible use. **No impact** would result.

e) Result in inadequate emergency access?			X	
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The Housing Element would not change transportation routes or general traffic patterns. Further, none of the goals or implementation programs would reduce emergency access, as they promote the development of new residential units and any new development would be required to meet all applicable local and state regulatory standards for adequate emergency access and comply with applicable Municipal Code and Fire Code requirements regarding emergency access. For these reasons, implementation of the Housing Element would result in **less than significant impacts** regarding inadequate emergency access.

The HMAP includes strategies for improving evacuation during emergency situations. No strategies within the HMAP or actions that may result would result in inadequate emergency access. For this reason, **no impact** would result.

f) Conflict with adopted policies supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X	
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The Circulation Element of the General Plan provides an emphasis on alternative modes of transportation, including Goal CIR 2, which promotes transit; CIR 7, which promotes pedestrian facilities; and CIR 8, which promotes a bicycle system. These Circulation Element goals have policies placing requirements regarding



design and provision of alternative transportation facilities on new development, which would be applicable to any residential development occurring as a result of the Housing Element. Implementation of the Housing Element and any resulting residential development would not create conflicts or inconsistencies with adopted transit system plans, guidelines, policies, or standards. The Housing Element would not disrupt existing or planned transit services or facilities. The development of new residential units may result in a slight increase in demand for alternative transportation, but would not be of a magnitude to deteriorate the operation of those transportation services or facilities. For these reasons, there would be a **less than significant impact** to policies supporting alternative transportation.

Similarly, the HMAP does not include strategies and would not result in actions that would conflict with alternative transportation policies. **No impact** would result.

g) Result in inadequate parking capacity?			X	
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The City has specific regulations regarding parking within the Circulation Element of the General Plan. Goal CIR 4 addresses a parking system that balances goals for economic development, advanced Intelligent Transportation Systems technology, reduced travel through Transportation Demand Management measures, livable neighborhoods, sustainability, and public safety within the City (City of Beverly Hills 2010h). Parking provisions are also addressed in Title 7, Article 1 of the Municipal Code.

The Housing Element would consider potential adjustments to development standards, including modification of parking requirements. This is detailed in Implementation Program 12.2, which states, “allowing greater flexibility in the type, and location of multi-family parking.” This potential modification to parking standards would not necessarily reduce the amount of parking required for a multi-family residential development; rather, it would allow for consideration of different types of parking solutions and the location of associated parking capacity. Beyond this adjustment to development standards, all future development activity that may result from implementation of the Housing Element would be subject to all City policies and requirements for provision of adequate parking capacity. For these reasons, there would be a **less than significant impact** regarding parking capacity.

The HMAP does not include strategies or specific actions that would interfere with parking capacity. **No impact** would result.

<b>17. UTILITIES AND SERVICE SYSTEMS.</b> Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	

New development would be required to comply with all provisions of the NPDES, as enforced by the RWQCB. All future projects would be required to comply with all applicable wastewater discharge requirements issued by the State Water Resources Control Board and RWQCB. Future development under the Housing Element would be required to adhere to existing regulations and the policies regarding wastewater treatment.

The Conservation Element of the General Plan provides goals and policies to reduce the volume and contamination of wastewater generated within the City. Goal CON 9 addresses a high-quality sewer system to minimize adverse affects to water quality, CON 10 addresses a storm drainage system that reduces pollutants



from entering the ocean, CON 11 addresses the provision of a storm drainage system that does not degrade the quality of surface waters or groundwater systems, and CON 12 addresses a storm drainage system that minimizes the amount of toxicity of discharge into the system (City of Beverly Hills 2010f). Any residential development resulting from implementation of the Housing Element would be required to comply with these goals and the associated policies.

Potential development associated with the Housing Element would be new or redeveloped residential units. The wastewater generated by this type of development would be similar to that produced by existing residential uses and would not create high volumes of highly contaminated wastewater that might be associated with a heavy industrial use. The Housing Element does not modify land uses and would not result in the development of other land use types that might generate substantial amounts of polluted wastewater. For these reasons, including the required compliance with applicable regulations and policies regarding wastewater, development associated with implementation of the Housing Element would not exceed wastewater treatment requirements of the RWQCB and a **less than significant impact** would result.

The HMAP does not include any strategies specific to water or wastewater treatment or any specific actions that might generate a need for water or wastewater treatment. Thus, **no impact** regarding wastewater treatment requirement would result.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
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The City of Beverly Hills contracts with the City of Los Angeles to treat wastewater at the Hyperion Treatment Plant (City of Beverly Hills 2011e). The Hyperion Treatment Plant has a dry-weather capacity of 450 MGD for full secondary treatment and an 850 MGD wet weather capacity. Current flow is 340 MGD, well below the facility's design capacity (City of Los Angeles Stormwater Program 2011).

The City's existing water treatment facility can treat up to 3 MGD and can further increase its capacity within the existing plant to 5.4 MGD, if needed. The water treatment facility was sized to accommodate development anticipated within the City, and also provides for additional expansion, as needed, to treat more water, whether it is required to treat increased water demand or decreased availability from other sources (City of Beverly Hills 2009b).

The Housing Element does not provide specific development plans; however, implementation programs would promote the development of new residential units in the City. The actual number of new units that might be constructed as a result of the Housing Element is not known, but the specific objective is to provide the 554 units in response to the existing shortfall identified by RHNA. The potential addition of these residential units would generate a volume of wastewater that is extremely minimal in comparison to the capacity at the Hyperion Treatment Plan and would not exceed or make a substantial change in the facility's capacity. Additionally, demand for water treatment services would slightly increase with development of new residential units. However, as described above, the City's water treatment facility has substantial additional capacity and has planned for anticipated growth and additional expansion, such as these new residential units. Thus, the



increase in demand for wastewater or water treatment due to implementation of the Housing Element would not exceed capacity of the treatment facilities and a **less than significant impact** would result.

The HMAP does not include any strategies specific to water or wastewater treatment or any specific actions that might generate a need for water or wastewater treatment. Thus, **no impact** to treatment facilities would result.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
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The Housing Element does not provide specific development plans; however, implementation programs would promote the development of new residential units in the City. The City is almost entirely built-out, with the majority of properties available for development already covered with impervious surfaces. The construction of new residential units in association with the Housing Element would most often occur on properties already in urban use and currently producing storm water runoff, as there are few vacant properties in the City. For this reason, new development or redevelopment within the City likely would not result in new areas of impervious surfaces and, thus, would not generate substantial new volumes of storm water runoff that could necessitate the construction of new storm water drainage facilities. Thus, implementation of the Housing Element would not necessitate new or expanded storm water drainage facilities to handle increased volumes of runoff. A **less than significant impact** related to storm water drainage facilities would result.

The HMAP does not include any strategies specific to storm water or any specific actions which might generate storm water runoff. Thus, **no impact** to treatment facilities would result.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			X	
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As described in the Draft 2010 Urban Water Management Plan (UWMP), as the City's population increases slightly and as water conservation measures continue to be implemented, the City should experience moderate increases in its water consumption. The future projections contained in the UWMP take into account only the currently adopted Housing Element, which lists 259 low- and very-low-income housing units to meet the City's Housing Needs Assessment. This is 295 units short of the current need of 554 units. The estimated residential per-unit water demand is 1.2 acre-feet per unit per year. Thus, the UWMP calculates the demand from 259 units listed in the currently adopted Housing Element as 311 acre-feet per year and includes that volume in the projected water demand. Using the same per-unit water demand, the additional 295 units identified in the updated Housing Element being evaluated here would require an additional 354 acre-feet per year beyond the amount anticipated in the UWMP (City of Beverly Hills 2011b).

The UWMP estimates that the City would need to import about 13,790 acre-feet of water in year 2015, assuming a multiple dry year. This is considerably less than the preferential right of 22,705 acre-feet under the same conditions. The UWMP concludes that the City can expect to meet future demands through 2035 for all climatologic conditions (City of Beverly Hills 2011b). The addition of up to 354 acre-feet per year to



meet the demand of the unaccounted for residential units that may result from implementation of the Housing Element would not exceed the City's available water supplies. Therefore, a **less than significant impact** would result regarding water supply.

The HMAP includes strategies to update the UWMP and obtain a state-of-the-art monitoring systems for City water storage facilities. These strategies would not impact water supply availability, but could provide state-of-the-art water monitoring systems to remotely monitor the City's water usage, leaks, and ruptures of the water reservoirs. Thus, **no impact** to treatment facilities would result.

e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
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The City of Beverly Hills contracts with the City of Los Angeles to treat wastewater at the Hyperion Treatment Plant (City of Beverly Hills 2011e). As previously described, the Hyperion Treatment Plant has a dry-weather capacity of 450 MGD for full secondary treatment and 850 MGD wet-weather capacity. Current flow is 340 MGD, well below the facility's design capacity (City of Los Angeles Stormwater Program 2011).

The Housing Element does not provide specific development plans; however, implementation programs would promote the development of new residential units in the City. The actual number of new units that might be constructed as a result of the Housing Element is not known, but the specific objective is to provide the 554 units in response to the existing shortfall identified by the RHNA. The potential addition of these residential units would generate a volume of wastewater that is extremely minimal in comparison to the capacity at the Hyperion Treatment Plant, and would not exceed or make a substantial change in the facility's capacity. For this reason, an increase in demand for wastewater treatment due to implementation of the Housing Element would not exceed capacity of the treatment facility and a **less than significant impact** would result.

The HMAP does not include any strategies specific to wastewater treatment or any specific actions that might generate need for wastewater treatment. **No impact** to wastewater treatment capacities would result.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
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Landfills currently serving the city of Beverly Hills are Puente Hills Landfill, Chiquita Canyon Sanitary Landfill, Sunshine Canyon Landfill, and Calabasas Sanitary Landfill. The Puente Hills Landfill is planned to close on October 31, 2013; the Chiquita Canyon Sanitary Landfill has a closure date of November 24, 2019. The Sunshine Canyon is expected to remain open until December 31, 2037, and the Calabasas Sanitary Landfill is scheduled to remain open until September 30, 2025. These landfills have a combined remaining capacity of 194,900,000 cubic yards (CalRecycle 2011). These landfill facilities provide adequate capacity to accommodate solid waste disposal needs of any new residential development that may result from implementation of the Housing Element. Thus, there would be a **less than significant impact** on solid waste disposal as a result of the Housing Element.



The HMAP does not include any strategies specific to solid waste disposal or any specific actions that might generate solid waste. Thus, **no impact** to landfills due to solid waste disposal needs would result.

g) Comply with federal, state, and local statutes and regulations related to solid waste?				X
---	--	--	--	---

State law requires a 50% diversion of solid waste from landfills. The City has developed an integrated approach to waste collection services, which includes trash, green waste, and recycling collection, and has achieved a waste diversion rate of 60% (City of Beverly Hills 2011f). Therefore, the City is in compliance with state law.

The Conservation Element of the General Plan includes goals and policies specific to reduction of solid waste. Goal CON 14 addresses a solid waste collection system that maximizes source reduction, recycling, and composting; CON 15 promotes public education about source reduction, recycling, and composting; and CON 16 addresses a waste management program and reduces that amount of waste entering landfills (City of Beverly Hills 2010f). The Housing Element would not interfere with or modify these goals and policies, and any resulting new development would be required to comply with all regulations. Additionally, as described above in 17f, solid waste generated within the City is disposed of in permitted landfills. For these reasons, no conflict with a federal, state, or local statutes or regulations related to solid waste disposal would occur with implementation of the Housing Element, and **no impact** would result.

The HMAP does not include any strategies specific to solid waste disposal or any specific actions that might generate solid waste. Thus, **no impact** to federal, state, or local statutes or regulations related to solid waste disposal would result.

18. MANDATORY FINDINGS OF SIGNIFICANCE. Would the project:				
a) Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	

Degrade the quality of the environment. The City is a built-out community that has very little natural environment left. The addition of residential units within the existing urban setting would not degrade the quality of the remaining natural environment. Any residential development associated with the Housing Element would be subject to all policies and requirements that are in place to maintain and enhance the existing quality of the urban environment. Thus, implementation of the Housing Element would not degrade the quality of the environment and a **less than significant impact** would result.

The HMAP includes mitigation strategies that generally involve actions such as updates to codes, retrofitting existing structures for safety, public education, analysis of systems and infrastructure, and similar types of



actions. The quality of the environment would not be degraded from these types of actions and a **less than significant impact** would result.

Substantially reduce the habitat of a fish or wildlife species. As summarized above and previously in Section 4 "Biological Resources," lands in the City are largely urbanized and contain few significant biological resources. No native plant communities are present within the City's boundaries. There is minimal natural area remaining, and the majority of vegetation in the City is maintained landscaping; other areas are covered with hard urban surfaces. No riparian areas are located within the City. The Housing Element would not change allowable development areas. For these reasons, residential development resulting from the implementation of the Housing Element would not substantially reduce the habitat of a fish or wildlife species. Thus, a **less than significant impact** to habitat would result.

The HMAP includes mitigation strategies that generally involve actions such as updates to codes, retrofitting existing structures for safety, public education, analysis of systems and infrastructure, and similar types of actions. These types of actions would not impact fish or wildlife habitat. For this reason, and those outlined above, implementation of the HMAP would have a **less than significant impact** on habitat.

Cause a fish or wildlife population to drop below self-sustaining levels. As summarized above and in Section 4 "Biological Resources," the City is largely urbanized, contains few significant biological resources, and contains no native habitat. No native plant communities are present within the City's boundaries. There is minimal natural area remaining, and the majority of vegetation in the City is maintained landscaping; other areas are covered with hard urban surfaces. No riparian areas are located within the City. The Housing Element would not change allowable development areas. For these reasons, the addition of new residential units to the existing urban setting of the City would not cause fish and wildlife populations to drop below self-sustaining levels, and a **less than significant impact** would result.

The HMAP includes mitigation strategies that generally involve actions such as updates to codes, retrofitting existing structures for safety, public education, analysis of systems and infrastructure, and similar types of actions. These types of actions would not impact fish or wildlife populations or their habitat. For this reason, and those outlined above, implementation of the HMAP would have a **less than significant impact** on fish and wildlife populations.

Threaten to eliminate a plant or animal community. As summarized above and in Section 4 "Biological Resources," the City is largely urbanized, contains few significant biological resources, and contains no native habitat. No native plant communities are present within the City's boundaries. There is minimal natural area remaining, and the majority of vegetation in the City is maintained landscaping; other areas are covered with hard urban surfaces. No riparian areas are located within the City. The Housing Element would not change allowable development areas. For these reasons, the addition of new residential units to the existing urban setting of the City would not threaten to eliminate a plant or animal community, and a **less than significant impact** would result.

The HMAP includes mitigation strategies that generally involve actions such as updates to codes, retrofitting existing structures for safety, public education, analysis of systems and infrastructure, and similar types of actions. These types of actions would not impact plant or wildlife populations or their habitat. For this reason



and those outlined above, implementation of the HMAP would have a **less than significant impact** on plant and animal communities.

Reduce the number or restrict the range of a rare or endangered plant or animal. As summarized above and in Section 4 “Biological Resources,” the City is largely urbanized, contains few significant biological resources, and contains no native habitat or rare or endangered plants or animals. The Housing Element would not change allowable development areas. For these reasons, the addition of new residential units to the existing urban setting of the City would not reduce the number or restrict the range of a rare or endangered plant or animal.

The HMAP includes mitigation strategies that generally involve actions such as updates to codes, retrofitting existing structures for safety, public education, analysis of systems and infrastructure, and similar types of actions. These types of actions would not impact plant or wildlife populations or their habitat. For this reason and those outlined above, implementation of the HMAP would not reduce the number or restrict the range of a rare or endangered plant or animal, and would result in a **less than significant impact**.

Eliminate important examples of the major periods of California history or prehistory. As summarized in Section 5 “Cultural Resources,” the potential existence of cultural resources is low due to previous construction-related ground-disturbing activities. However, all development would be required to adhere to regulations protecting historic resources, such as the National Historic Preservation Act, CEQA, local General Plan policies, and review by the Beverly Hills Architectural Commission acting as the City’s Landmarks Advisory Commission. Compliance with these and other regulatory requirements would minimize the potential for development to eliminate important examples of California history or prehistory, and a **less than significant impact** would result from implementation of the Housing Element.

The HMAP includes mitigation strategies that generally involve actions such as updates to codes, retrofitting existing structures for safety, public education, analysis of systems and infrastructure, and similar types of actions. These types of actions would not impact cultural resources, and a **less than significant impact** would result.

b) Have impacts that are individually limited, but cumulatively considerable? ( <i>"Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects</i> )			X	
---	--	--	---	--

It is possible that the development of new residential units within the City as a result of the Housing Element would result in environmental effects that could combine with the effects of other projects, either during construction or operation. Issues such as noise, traffic, public services, hydrology and water quality, air quality, and utilities are likely to have the types of effects that might incrementally add to impacts of other projects. Because this type of infill development that may result from implementation of the Housing Element would generally be located in previously disturbed areas within existing urban locations, it would reduce the potential for impacts to these issue areas through minimized vehicle miles traveled, minimal disturbance of land, minimal creation of new impervious surfaces, and continued utilization of existing public



services and utilities. Additionally, because any development associated with the Housing Element and other cumulative projects would be subject to all policies, regulations, and ordinances aimed at reducing potential impacts and minimizing any adverse environmental effects from project development and operation, impacts would be systematically reduced across all projects. This would decrease the potential for impacts to combine together and result in cumulatively considerable effects. In addition, the Housing Element is consistent with the 2008 SCAG Regional Comprehensive Plan. For this reason, the limited impacts associated with implementation of the Housing Element would not combine with other projects to result in cumulatively considerable effects, and the impact would be **less than significant**.

The HMAP includes mitigation strategies that generally involve actions such as updates to codes, retrofitting existing structures for safety, public education, analysis of systems and infrastructure, and similar types of actions. These are generally not the type of actions that could combine with other projects and cause substantial cumulative impacts. For this reason, implementation of the HMAP would result in **less than significant** cumulative impacts.

c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	
--	--	--	---	--

As described throughout the analysis of this Initial Study, most potential environmental impacts that might result from development of new residential units during the implementation of the Housing Element would be less than significant or could be mitigated to below a level of significance. Most resulting effects of the Housing Element would cause minor nuisances such as audible temporary construction noise, slight increases in traffic, or other similar-type issues, which are not considered to be substantial adverse effects. Thus, implementation of the Housing Element and its implementation programs would not result in environmental effects that would cause substantial adverse effects to human beings.

The HMAP would implement strategies to provide advanced preparation and protection of human life and property from natural and human-caused/created disasters and hazards. Many of the strategies involve actions such as updates to codes, retrofitting existing structures for safety, public education, analysis of systems and infrastructure, and similar types of actions. These strategies would not result in environmental effects that would adversely affect humans; rather, they would serve to protect and minimize potential harm. Implementation of the HMAP would have a **less than significant impact** regarding adverse effects on humans.



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**APPENDIX A**  
**2008-2014 HOUSING ELEMENT**

# HOUSING

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## Overview

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The Housing Element is a guide for expanding housing opportunities and services for all household types and income groups, and policy guidance for local decision-making related to housing. The City of Beverly Hills Housing Element details programs which the City intends to implement as a means of encouraging more affordably priced housing in the City, and assuring that the community's housing needs are met.

The 2006–2014 Housing Element is an update of the City's 1998–2005 Housing Element. Update of the City's Housing Element would typically be sequenced with the State's 2006–2014 planning cycle for housing, which is better known as the "Regional Housing Needs Allocation", or RHNA (pronounced "rhee-nah"). RHNA occurs every 5 years, with Housing Element updates following. The last RHNA was completed in 2008 (2 years after the official beginning of the current planning cycle began in 2006). RHNA, and other State requirements are discussed at length later in the document.

The Element also includes detailed information on the community's housing needs, housing stock in the City, factors affecting the development of housing, and an inventory of multi-family housing sites in the City which have a potential to be redeveloped during the current planning cycle (2006–2014).

The Housing Element is consistent with the policies and programs set forth in the General Plan. The City will ensure that future updates of other General Plan elements include review and, if necessary, modification of the Housing Element in order to maintain consistency within the General Plan.

## Housing Element Organization

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The Housing Element is organized into the following sections:

1. **Overview:** Summarizes organization of the document, public participation in the process, and the housing needs of the community, purposes of the Housing Element and statutory requirements and a description of data sources used in the update process.
2. **Community Profile:** Analysis of housing needs in Beverly Hills, including population demographics, residents with special needs, housing characteristics, and current rent and ownership trends.
3. **Potential Constraints on Housing Production and Conservation:** Review of potential market, governmental, and environmental constraints which may impact the community's ability to meet housing needs.

4. **Housing Resources:** Analysis of land, financial, and organizational resources available to address housing needs.
5. **Review of Past Accomplishments:** Evaluation of accomplishments toward meeting the goals and policies of the prior Housing Element (1998-2005).
6. **Housing Plan:** Housing strategy to address the community's housing needs. Includes housing goals, policies, and programs.
7. **Appendix A - Housing Sites Inventory:** Summary of the potential housing sites inventory and lists of potential sites.

**Public Outreach and Participation**

The City encourages and solicits the participation of its residents and other local agencies in the process of identifying housing and community development needs, and prioritizing expenditure of City funds.

The Public outreach and involvement in forming the Housing Element update was initiated in conjunction with the City's comprehensive update to its General Plan, and was part of included the extensive community outreach conducted in support of this effort following actions. The City follows a standard noticing process. This standard process includes direct noticing of stakeholders, affected agencies, and persons. The following chart describes the City's typical noticing process.

**Public Outreach**

<u>Noticing in local newspapers</u>	<p><u>Notices of availability of document drafts and final versions are announced in the two local papers in town - the Beverly Hills Courier, and the Beverly Hills Weekly. Typically notices are run as close to the date the document is released as possible.</u></p> <p><u>Notices of study sessions, and public hearings on documents are also noticed in both papers at least 10 days prior to the meeting.</u></p>
<u>Noticing in public places</u>	<p><u>Availability of document drafts is posted at the City's library, in the municipal parking garage, and in City hall.</u></p> <p><u>Notices of study sessions, and public hearings are also posted in the same places at least 10 days prior to the meeting.</u></p>

<u>Direct noticing</u>	<u>The City maintains a list, and sends email announcements, to all persons who have expressed interest in receiving notifications. Any interested person may sign up to be included on the list through the City's website.</u>
<u>Advertising</u>	<u>In addition to the standard newspaper and posted noticing, the City includes the availability of documents, study sessions and public hearings in a monthly announcement run in the papers. The City's monthly announcement advertises public events and opportunities for public participation.</u>

The draft housing element was released on November 19, 2010. As part of that release, hard copies of the draft document were also sent to the following agencies, non-profits and persons who had previously submitted comment letters, or requested copies.

**Public Release of Draft Housing Element – November 19, 2010**

Drafts of the City's Housing Element update were made available at the following locations in the City.

- City of Beverly Hills Public Library Reference Desk
- City of Beverly Hills Permit Center Counter
- City of Beverly Hills City Clerk's Office
- City's Website (for view or download)

In addition, hardcopies of the document draft were sent directly to the following agencies, non-profits and individuals with expressed interest in the element update. These include groups who represent lower income populations, as well as affordable housing advocacy groups.

City of West Hollywood

City of Culver City

City of Santa Monica

City of Los Angeles

County of Los Angeles

- County Supervisor
- Regional Planning Office
- Housing Authority

SCAG

- Housing and EIRs
- Comprehensive Planning
- Land Use and

Environmental Planning

West Hollywood Community  
Housing Corporation

Public Counsel Law Center

Shelter Partnership

P.A.T.H. (People Assisting the  
Homeless)

Dawson, Tilem and Gould

California Native American  
Heritage Commission

Gabrielino/Tongva Nation

Gabrielino/Tongva San Gabriel  
Band of Mission

Menorah Housing Foundation

The Housing Element update was originally anticipated to be completed with the City's recent general plan amendments. Those amendments, adopted on January 11, 2010, were initiated in the following public outreach and involvement for the General Plan update, adopted on January 11, 2010, followed by a description of the public outreach conducted solely on the 2008-2014 Housing Element.

***Plan Day***

Community involvement in the current Housing Element Update planning process began in 2001 with Plan Day, which was an all day event that engaged the community in a visioning process for an upcoming update to the City's General Plan.

***General Plan Topic Committees***

In 2002, Topic Committees were formed by the City Council. The seven topic committees were made up of 175 interested community members representing a cross-section of the community. The task of these committees was to identify issues and opportunities important to the community that should be incorporated into the updated General Plan. The committees spent a year studying issues facing the City, and needs of the community.

In early 2004, the topic committees presented final reports to the City Council. The final reports included many suggestions on how the City could best address the needs of the community and the issues facing the City. Almost all of the topic committees

touched on an aspect of housing in the City; however the topic committee that focused the most on housing was the Residential Issues Committee.

### ***Public Input Outreach Meetings***

In 2006, ten community outreach meetings/workshops were conducted to input on possible land use alternatives that included new residential and mixed-use opportunities. These workshops provided opportunities for residents to recommend strategies, review and comment upon housing issues, and discuss new opportunities for housing.

Subsequent to adoption of the General Plan in January 2010, the City began a focused public outreach effort for the 2008-2014 Housing Element update.

### ***Planning Commission Study Sessions on Housing Element***

The Planning Commission reviewed the City's accomplishments from the previous housing element planning cycle (1998-2005) and recommended programs to be continued or modified, and new programs to be initiated in the current planning cycle. The Planning Commission held seven meetings during development of the 2008-2014 draft housing element in the spring and summer months in 2010. Meetings were open to the public, and comments from the public were taken. The City provides advance notice of meetings and makes copies of all related materials available for public review 10 days in advance of meetings.

### ***Second Unit Survey***

In July of 2010, the City mailed a second unit survey to all single-family property owners in the City. This mailing served to obtain information on the extent of second units in Beverly Hills, who resides in them and their affordability. The survey was also used to elicit comments from residents on second units, and had the dual purpose of informing residents that second units are both legal and encouraged in Beverly Hills, as well as informing them about the Housing Element update.

### ***Public Noticing and Summary of Comments Received***

The City follows a standard noticing process for public outreach which includes making documents available at the City's library and in City Hall at the City Clerk's Office and at the Permit Center Counter. Documents are also available on the City's website and are sent to the County Recorder's Office. In addition to the City's standard process, the Housing Element draft was directly noticed to stakeholders, affected agencies, the Planning Commission, City Council and all interested persons. The chart below describes the City's noticing process followed for the Housing Element update.

**Public Noticing**

Noticing in local newspapers      Notices of availability of document drafts and final versions are announced in the two local papers in town - the Beverly Hills Courier, and the Beverly Hills Weekly. Typically notices are run as close to the date the document is released as possible.

Notices of study sessions, and public hearings on documents are also noticed in both papers at least 10 days prior to the meeting.

Direct noticing      The City maintains a list, and sends email announcements, to all persons who have expressed interest in receiving notifications. Any interested person may sign up to be included on the list through the City's website.

Advertising      In addition to the standard newspaper and posted noticing, the City will include the availability of documents, study sessions and public hearings in a monthly announcement run in the papers. The City's monthly announcement advertises public events and opportunities for public participation occurring in the City.

The following comments have been received through the Housing Element public outreach process:

**Public Comments Received**

**Community Members**

Joseph N. Tilem  
 Dawson, Tilem & Gole  
 (Sept. 2, 2008)      The proposed housing program establishing a bi-annual housing maintenance inspection program should be limited to only include property owners who are in violation.

The City Council removed the program at this time out of concern that due to past and anticipated future budget cuts that the city would not have the ability to institute a new inspection program.

**Community Groups**

Kenneth Goldman  
 Southwest Home Owners      Rezoning for additional residential housing units will reduce the city's ability to

### **Public Comments Received**

Association  
(Sept. 5, 2008)

provide adequate police and fire protection, and will have various impacts on hydrology and water supply. These issues need to be discussed further in the final EIR. Further the draft plan does not adequately explain how the number of new residential units that would result from rezoning was determined.

At the time this comment was received, the City had released a draft general plan update that included the housing element update and a number of changes to the scale and density of development throughout the city's commercial areas. Several commercial areas were proposed to be rezoned to commercial/residential use.

The city subsequently conducted an analysis of additional housing potential in the R-4 zones that indicated that the city has the capacity to meet both its previous housing needs and future housing needs within its existing R-4 zones. This is further discussed in the sections "Meeting Regional Housing Needs Allocation (RHNA)".

Additional information was added and more in-depth analysis was conducted to address these comments.

### **Public Advocacy Groups**

The following summarizes the major comments raised by the public and housing advocacy groups throughout development and review of the draft Housing Element. Following each comment is reference to how the issue was addressed within the Housing Element.

1. The City needs to more proactively encourage the development of affordable housing, and identify programs for development of housing to address the needs of extremely low income households.
  - The draft Housing Element has been revised to identify specific actions to support in the development of an affordable housing project which targets extremely low and lower income senior renter households. Programs 10.7 (Partnership with Affordable Housing Developers) and 11.2 (Senior Housing Development) outline the City's actions, including issuing an RFQ, selecting an affordable developer, and providing a variety of regulatory and financial incentives for development. (Pages 162, 163)

### Public Comments Received

2. By requiring a conditional use permit (CUP) for siting multi-family dwellings for the elderly and handicapped in high density residential zones, the City's zoning ordinance serves as a constraint to the provision of housing for persons with disabilities. The public notice and hearing process required with a CUP can become a lightning rod for community opposition against housing for persons with disabilities, and the fees associated with the CUP can become cost prohibitive for an affordable housing developer.

- Multi-family housing serving seniors and disabled is permitted by right in all multiple-family residential zones and subject to the same standards as other residential uses. In order to take advantage of a potential doubling in density (up to 165 units/acre) and other modified development standards, the City requires discretionary review through a CUP process to ensure neighborhood compatibility. In order to address concerns regarding the cost impact of the CUP on affordable housing, the City has added a program action to waive the CUP fees for affordable senior and disabled housing. (Page 168)

3. The Housing Element proposes to limit transitional and supportive housing to the R-4 overlay district for elderly and disabled persons, subject to the same standards and permitting procedures as other residential uses. The City should not limit these uses to an overlay district, but instead, should allow these uses in all zones allowing residential uses.

- California Housing Element Law states that "transitional housing and supportive housing shall be considered a residential use of property, and shall be subject to those restrictions that apply to other residential dwellings of the same type in the same zone." Gov. Code 65583(a)(5). Given the broad latitude granted to cities in determining the location of housing uses, we believe that the City retains some discretion in determining which residential zones transitional and supportive housing may be developed. In order to comply with the state policy that development standards encourage the development of these types of facilities, but in light of the City's interest in ensuring that the housing type be compatible with the surrounding neighborhood, the City has identified the R-4 overlay as an appropriate zone for transitional and supportive housing. An expanded discussion has been added to the Element which describes the appropriateness of the R-4 overlay zone and

**Public Comments Received**

availability of sites for transitional and supportive housing.  
(Pages 82, 83, 89, 166, 191)

Remy De La Peza  
Public Counsel Law Center  
(Sept. 19, 2008)

Provided a series of comments  
identifying inadequacies in the  
information and analysis  
provided in the housing element  
section of the general plan  
update.

At the time these comments were received, the City had released a  
draft general plan update that included the housing element  
update and a number of changes to the scale and density of  
development throughout the city's commercial areas. Several  
commercial areas were proposed to be rezoned to  
commercial/residential use. The city was anticipating meeting all of  
its new housing needs required under the RHNA in the rezoned  
areas. As a result of public comments, the city opted not go  
forward with this project, opting rather to update the general plan  
without the housing element or any changes to scale and density of  
development. Subsequently, an analysis of additional housing  
potential was conducted in the city's R-4 zones that indicated that  
the city has the capacity to meet both its previous housing needs  
and future housing needs within its existing R-4 zones. This is further  
discussed in the sections "Meeting Regional Housing Needs  
Allocation (RHNA)". (Page 113 – 126)

Nicky Viola  
Shelter Partnerships  
(Jan. 13, 2011)

Provided a series of comments  
identifying inadequacies in the  
information and analysis  
provided in the housing element

At the time these comments were received the city had revised the  
housing element update that had been provided as part of the  
general plan update. This revised draft housing element update  
was released separately and had been sent to HCD for review and  
comment.

The City subsequently met with Shelter Partnerships to further discuss  
their comments and incorporated revisions to the draft update to  
better explain the City's senior and disabled housing incentives and  
proposal for meeting the provisions of SB 2, which were the focus of  
Shelter Partnership's comments:

- The City's housing element update should quantify and  
analyze the needs of extremely low-income households.

A section discussing extremely low-income households has been  
included in the community profile section of the document.

### **Public Comments Received**

*(Page 39)*

- The City requires a CUP for housing for persons with disabilities.

The City only requires a CUP for housing for persons with disabilities if the developer would like to utilize the City's incentives offered for the development of housing for disabled persons. These incentives include a density of 165 units per acre and reductions in parking and unit size requirements. Additionally, the City intends to comply with State requirements given in the Health and Safety Code 11834.23. The City currently defers to the State definition for disability. As an alternative to developing a reasonable accommodations ordinance, the City proposes to institute a process for requesting reasonable accommodation (Program 11.5). (Page 165)

- The City's CUP requirement for "elderly and handicapped" housing projects is a barrier to development

The City only requires a CUP if a developer wishes to take advantage of the incentives the City offers for the development of senior and disabled housing. In the most recent cycle a developer, utilizing the City's incentives, constructed an 88-bed congregate care facility in the "Multi-family Congregate Housing for Elderly and Disabled Persons" overlay zone.

- The cost of a CUP is prohibitive to affordable housing providers

The City proposes to waive fees associated with the CUP (Program 12.3) (Page 168)

- The City should allow senior and disabled housing by right

The City allows senior and disabled as a use by right. If a housing developer would like to take advantage of the City's incentives for developing senior and disabled housing, the City requires a CUP, realizing costs may be prohibitive the City will waive the associated fees. (Page 168)

- Please provide more information on the Multi-family Congregate Housing for Elderly and Disabled Persons

Additional information has been included on the overlay zone in the section titled "Provisions for a Variety of Housing" and a map of the zone is provided at the end of the document. (Page 82, 83, 89, 166, 191)

- Multi-family Congregate Housing for Elderly and Disabled Persons is not discussed in the element or in the municipal code. The City cannot single out a particular zone for

### **Public Comments Received**

transitional and supportive housing

*Multi-family Congregate Housing for Elderly and Disabled Persons Overlay Zone is discussed in the section titled "Provisions for a Variety of Housing" and a map is included at the end of the document. The overlay zone is codified in the City's Municipal Code (BHMC 10-3-12.8). The City's municipal code is available online at:*

*[http://www.sterlingcodifiers.com/codebook/index.php?book\\_id=466](http://www.sterlingcodifiers.com/codebook/index.php?book_id=466). The City's legal department has reviewed the housing element update and no changes were deemed necessary for compliance with State law.*

### **State Department of Housing and Community Development**

Housing and Community  
Development

On January 21, 2011 the State Department of Housing and Community Development (HCD) provided a comment letter to the City. In the letter, the State requested additional analysis of potential sites and government constraints among other additional information. The following revisions were incorporated into the draft document to address HCD's comments.

- Please analyze housing needs for extremely low-income households

The section titled "Community Profile" now includes an analysis of "Needs of Extremely Low Income Households". (Page 39)

- City must demonstrate that it rezoned adequate housing sites in the previous housing cycle or at the beginning of this housing cycle.

A new section has been added to the housing element titled "Addressing Unaccommodated RHNA from the Prior Planning Period" in which the City quantifies that in the prior cycle/ beginning of the current cycle (2005-2008) 19.96 acres of land was rezoned from commercial to residential and entitled for 483 new residential units and providing a future \$4.83 Million towards the housing trust (Program 10.3). Additionally, the City reevaluated the housing potential in the existing R-4 zone (> 30 units/acre), calculating unit density based on the zoning code and assuming an 85% build out. This reevaluation indicates that

### **Public Comments Received**

the City has the potential to meet its current RHNA as well as the carry over amount. Since there were no changes in zoning development standards that resulted in greater unit density, and the City experienced continued redevelopment of R-4 zoned properties during the prior cycle, it can be assumed that the unit potential found in the City's R-4 zone during the prior cycle was at least as much as what is existing today. Based on the reevaluation of unit potential and the rezoning of lands for residential use the City feels that it has met the State's requirements for accommodating the needs from the prior planning period. (Pages 113 - 126, 148)

- Please provide additional information on the suitability of non-vacant sites.

The City has revised its sites inventory, providing a section on the analysis and results in the Housing Inventory section, and updated tables at the end of the document (Appendix A). Although maps visually demonstrating where potential sites are located were provided in the first draft of the element, the City was not able to update those maps and so no maps are provided with this draft. (Pages 77, 118, 119, 169 - 173)

- Please provide additional information on the suitability of small sites

The sites inventory has been narrowed and the new analysis is presented in the Housing Resources section ("Sites Inventory"). The results of the analysis suggest that four sites in the City meet the State's threshold for affordable housing projects using State and Federal funding (50-80 units). When the unit densities offered in the incentives for senior and disabled housing are applied however the number of sites meeting that criterion is over 45. (Pages 74, 77, 172, 174, 176 - 188)

- Please provide more information on the zone overlay district proposed for emergency shelters

Additional information is presented on the City's congregate care overlay zone, its location and the City's reasoning in proposing to allow other special needs housing types in this overlay zone. (Pages 82, 83)

- Governmental constraints analysis. Fees and Exactions

A comprehensive list of fees has been provided in this draft and all fees have been provided for representative multi-family housing project. A typical single family housing project has not been included because the City does not see many speculative single family projects. The typical single family project in the City is an owner-builder renovation or tear-down-new construction

### **Public Comments Received**

project. (Pages 98 - 112)

- Governmental constraints analysis. Local Processing and Permit Procedures

Additional information is presented on the City's processing and permit procedures (Pages 90 - 96)

- Governmental constraints analysis. Architectural Commission Review

Additional information is presented on the City's processing and permit procedures (Page 95)

- Governmental constraints analysis. On/Off Sites Improvements

Additional information is presented on the City's on and off site improvement requirements (Page 104)

- Governmental constraints analysis. Codes and Enforcement Amendments to the California Building Code are presented along with an analysis on their impact on the provision of housing (Pages 97, 133, 134)

- Governmental constraints analysis. Constraints on Persons with Disabilities

Additional information is presented on the City's reasonable accommodations process. Program 11.5 presents the City's process in written form and provides it in outreach materials to the public. (Pages 84 - 87, 165)

- Please provide a greater analysis of energy conservation opportunities in existing housing stock, such as promoting the use of utility programs or other potential opportunities

Additional information is presented on the City's energy conservation programs (Page 132)

- Additional information is requested on the City's housing inventory. As such, a determination on whether the City has adequate capacity to accommodate the RHNA during this planning cycle has not been determined. A determination will be made once sufficient information is provided. Depending on what conclusions are drawn from the revised housing inventory the City may need to expand its housing programs to address any shortfall in sites or zoning available to encourage a variety of housing types.

The City has revised its housing inventory and that inventory is presented in the beginning of the "Housing Resources" section of the document. The full inventory is also provided at the end

### Public Comments Received

of the document in Appendix A. Based on this further analysis the City feels that its share of the RHNA can be accommodated within the City's existing and rezoned residential areas. The City realizes for affordable housing to be successfully constructed promotional and incentive programs need to be offered. A greater presentation of the City's current unit density incentives for senior and disabled housing has been provided and the City is in the process of bringing forward additional incentives for affordable housing listed in the programs. These include reduced or waived fees, relaxed development standards and requirements, outreach and marketing, and partnerships. (Pages 39, 40, 82 - 87, 89, 113 - 126, 148, 160 - 163, 170 - 188, 191 - 193)

- Since the City has identified underutilized and small sites in relation to meeting the RHNA, the City must include specific program actions to promote redevelopment and lot consolidation.

The City encourages lot consolidation by offering greater unit densities based on the number of lots consolidated. The City also has a second unit ordinance that allows by-right units of up to 650 feet in most of the City, and is looking to expand that allowance to all single-family areas. Additionally the City is looking at modifying the multi-family development standards by reducing, or eliminating the minimum unit size, moving to an FAR calculation for residential buildings as opposed to unit density, reduced parking requirements and other development standard modifications. (Pages 74, 77, 97, 98, 168)

- Transitional and supportive housing should not be limited to one zone.

The City's legal department has reviewed the housing element update and no changes were deemed necessary for compliance with State law.

- Please provide a date for expanding the City's second unit ordinance.

The City allows second units by-right in most single-family areas of the City. Program 10.4 will expand that provision to the City's remaining single-family areas, and will increase the by-right size from 650 square feet to 1,000 square feet. The timeline has been revised to complete the program within one year of adoption of the housing element. The following provides a summary of background on second units in the City. The City sent a survey to all single-family homeowners in 2010 asking questions on second units, whether they had a second unit, who was living in

**Public Comments Received**

it if they did, and whether they thought second units were a good idea. The results were resounding support for second units and indicated that a substantial number of second units in the City provide housing at no cost to aged family members and caregivers providing support for aged homeowners. The City sees second units as a form of housing that meets, in part, the need for housing of members of the community who fall into the extremely low- and low-income categories. (Pages 120 – 123, 160)

- Please provide greater incentives and concessions for the development of housing for the extremely low income.

The City has revised programs to offer greater incentives and concessions for senior housing; especially for extremely low income seniors (Seniors constitute the largest population bracket of extremely low income community members in the City). (Pages 39, 40, 155 – 169)

- Please increase outreach for partnerships in affordable housing (Program 10.7)

The City is in talks with the West Hollywood Community Housing Corporation and is finalizing outreach and informational brochures that will provide information on housing incentives and programs. A target date for hosting an outreach meeting later this year, and continue this on an annual basis. (Pages 162)

- Please further evaluate governmental constraints as part of this housing element update and provide programs to remove those constraints.

A greater analysis of governmental constraints has been provided in the document in the "Potential Constraints on Housing Production and Conservation" section and programs to remove constraints have been revised to provide direct actions. (Pages 64 – 112)

- Allow Care Facilities of seven or more in all residential zones

The City's legal department has reviewed the housing element update and no changes were deemed necessary for compliance with State law.

- If the City adopts an inclusionary housing program, please analyze it as a constraint on the development of housing

The City has not adopted an inclusionary housing program and therefore the program has not been analyzed as a constraint.

- Please demonstrate diligent efforts to achieve public participation of lower- and moderate income households

### Public Comments Received

*A more complete presentation of the City's outreach process and the public comments received is included at the beginning of this draft. (Pages 4 - 18)*

- *Please analyze safety element and conservation element policies in relation to flood hazard management information and this housing element.*

*The City does not have any flood hazard areas. The general plan safety and conservation elements were recently updated in 2010, as was the City's hazard mitigation action plan. These documents discuss hazards in the City and identify a series of policies and programs to address them. The policies and programs contained in those documents are consistent with the policies and programs in the draft housing element.*

### Summary of Community Profile and Housing Needs

The section provides a summary of the community profile and housing needs.

#### **Community Profile Summary**

- The City of Beverly Hills is in a high-rent area and average wages and income are higher than the county's averages.
- Most residents in the City are renters, most seniors rent.
- The population is relatively stable; however the number of families with children is growing, while the number of seniors and young adults are decreasing.
- Average rents are high, and seniors and young adults may be having trouble finding affordable places to rent.
- Most residential units are multi-family buildings (apartments) and most multi-family buildings were constructed prior to 1960.
- 17.2% of the residents in the City qualify for Low and Very Low affordable housing, many of these residents are seniors.

- **Population is stable**

The Beverly Hills community has approximately 36,000 full-time residents. The resident population grew approximately 6-percent in the last 20 years. Although the resident population was relatively stable, the last 20 years saw some changes in the distribution of ages.

- **Number of children in the City is growing**
- **Seniors and young adults are leaving for cheaper rent Outside of the City**

Between 1990 and 2000, the proportion of the population that was under 18 years of age (children) in the City grew by 65%, while

the proportion of seniors (over 65 years of age) and young adults (between 19 - 35 years of age) decreased. The decrease in the proportion of young adults and seniors in the population between the years 1990 and 2000 may be directly related to the cost of rental housing, which in 2007 averaged \$1,500 a month for a one bedroom apartment. This combined with the low vacancy rate of 3% suggests that Beverly Hills is a high-demand housing market, making it difficult for lower income individuals to remain in the City.

- **There are more jobs than housing units in the City**
- **Most jobs are well paying, median household income in the City is higher than average wages for the Westside sub-region**

There are approximately 46,000 jobs in the City. The total number of housing units is close to 16,000. The following chart lists the most common jobs by job sector and annual pay, ranked by most common job sector to least common job sector.

<u>Job Sector</u>	<u>Average Annual Pay</u>
Retail	\$45,000
Health	\$60,000
Entertainment	\$242,000
Business Services	\$68,000
Restaurants	\$22,000

The most common jobs in the City pay on average \$45,000 and \$60,000 annually. Whereas the median income in the City is about \$70,000; this suggests that people earning lower wages may be commuting in from areas immediately outside of the City, or farther, and not living within the City boundaries.

### **Housing Needs Summary**

The community's housing needs are further expanded below and discussed in greater depth in the Community Profile, Potential Constraints on Housing Production and Conservation, and Housing Resources sections.

The community's most pressing housing need is for affordable housing for seniors and young adults. There is also a need for housing for families with school-aged children. However, it appears that this need is currently being met as the number of families with children is increasing, whereas the number of seniors and young adults in the City is decreasing.

- **17.2% of City Residents Qualify for Low or Very Low Affordable Housing**

Average wages and median income in the City are more than the Area Median Income (AMI) for Los Angeles County of approximately \$54,000. That being said, the average annual salary of a person living in a shared living situation (with a roommate) is about \$50,000 (proportionally this applies to about 6% of the City's population). In addition to this, approximately 8.8% of the City's residents would qualify for Very Low housing (earning less than 30% of the AMI), and 8.4% would qualify for Low housing (earning between 30% – 50% of the AMI).

- **Most Residents in the City Rent**
- **Most Seniors Rent**
- **Most Rental Housing Was Constructed Prior to 1960**

Most residents in the City rent (68% of residents); while most of the City's rental housing was constructed before 1960 (76% of housing). 27-percent of households in the City are headed by a senior (over 65 years of age), and 64% of senior households rent. 40% of persons living with disabilities in the City are also senior.

...

### **Purpose and Statutory Requirements**

State Housing Element law requires each City and County to identify and analyze existing and projected housing needs within their jurisdiction and prepare goals and policies, and programs to encourage the development, improvement, and preservation of housing (Government Codes Sections 65580 – 65589).

State housing element law:

- *Identify adequate sites to facilitate and encourage the development, maintenance and improvement of housing for households of all economic levels, including persons with disabilities;*
- *Remove, as legally feasible and appropriate, governmental constraints to the production, maintenance, and improvement of housing for persons of all income levels including persons with disabilities;*
- *Assist in the development of adequate housing to meet the needs of low- and moderate-income households;*
- *Conserve and improve the condition of housing and neighborhoods, including existing affordable housing;*
- *Promote housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability; and*
- *Preserve for lower-income households the publicly assisted multi-family housing developments within each community."*

### **Regional Housing Needs Assessment (RHNA)**

Each city and county is required to develop local housing programs to meet its "fair share" of existing and future housing needs for all

community members (based on income group), as determined by the jurisdiction's Council of Governments.

In the six-county southern California region, which includes Beverly Hills, the agency responsible for assigning these regional housing needs to each jurisdiction is the Southern California Association of Governments (SCAG). The regional growth allocation process begins with the State Department of Finance's projection of statewide housing demand for the planning period, which is then apportioned by the State Department of Housing and Community Development (HCD) among each of the State's official regions.

This "fair share" allocation concept seeks to ensure that each jurisdiction accepts responsibility for the housing needs of not only its resident population, but also for the jurisdiction's projected share of regional housing growth across all income categories. Regional growth needs are defined as the number of units that would have to be added in each jurisdiction to accommodate the forecasted number of households, as well as the number of units that would have to be added to compensate for anticipated demolitions and changes to achieve an "ideal" vacancy rate.

SCAG has determined the projected housing need for Southern California Region for the 2006-2014 Housing Element cycle<sup>1</sup>, and has allocated this housing need (by income category) to each jurisdiction. This is the "Regional Housing Needs Assessment" or RHNA. The RHNA is the minimum number of housing units each community is required to provide "adequate sites" for through zoning and is one of the primary threshold criteria necessary to achieve approval from the State Department of Housing and Community Development.

In allocating the region's future housing needs to jurisdictions, SCAG is required to take the following factors into consideration:

- Market demand for housing
- Employment opportunities
- Availability of suitable sites and public facilities
- Commuting patterns
- Type and tenure of housing
- Loss of units in assisted housing developments
- Over-concentration of lower income households
- Geological and topographical constraints

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<sup>1</sup> The 2008-2014 SCAG Housing Element planning period extends beyond the typical five-year planning cycle to provide consistency with projections contained within SCAG's Integrated Growth Forecast

As defined by the RHNA, Beverly Hills' new construction need for the 2006-2014 period been established at 554 new units.

**Chart 1 Cumulative Regional Housing Needs Allocation (RHNA) for Current Planning Cycle (2006-2014)**

	Total Units	Number of Units to Plan for Based on Affordability (Area Median Income (AMI) for Los Angeles County)			
		Very Low (50% and below)	Low (51-80%)	Moderate (81-120%)	Above Moderate (Greater than 120%) - e.g. "Market-Rate"
Prior 1998-2005 RHNA	256	35	42	40	139
1998-2005 Units Approved	460	0	0	0	460
Carry-Over Units from prior RHNA	117	35	42	40	0
New 2006-2014 RHNA	437	111	71	77	178
<b>Total 2006-2014 RHNA (carry-over + new)</b>	<b>554</b>	<b>146*</b>	<b>113</b>	<b>117</b>	<b>178</b>

\* An estimated half (73 units) of the City's RHNA need for 146 very low income units are for units affordable to extremely low income households.

With the passage of AB 1233 in 2005, jurisdictions which failed to identify adequate sites (as determined by the State Department of Housing and Community Development (HCD)) in their prior housing elements are now required to make up the shortfall in sites in the updated Element. In other words, any shortfall in sites designated to meet the prior RHNA becomes additive to the RHNA for the current planning period.

Beverly Hills' self-certified its Housing Element in the past cycle and in so doing took on the responsibility of both planning for, and assuring that the units planned for were created. The number of "above moderate" (market-rate) units allotted to the City were created during the past cycle, however the number of affordably-priced units (very low, low, and moderate income) were not. Therefore, because HCD had determined the City had not provided adequate sites in its past Housing Element and no affordable units were produced, the 117 very low, low and moderate income units from the past RHNA carry-over and are added to the number of units that the City is required to plan for during this Housing Element cycle. In total, the City is required to plan for the creation of 554 new housing units during the 2006-2014 planning period, including 146 very low income units (half, or 73 units of which are for extremely low income households), 113 low income units, 117 moderate income units, and 178 above moderate income units (refer to Chart 1).

The City will continue to provide sites for a mix of multi-family housing, supported by a variety of programs to enhance affordability, to accommodate its RHNA and contribute towards addressing the growing demand for housing in the southern California region.

### **Data Sources and Methods**

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Data and reference materials were obtained from the following sources:

- *Census Data* – The 2000 Census provides the basis for population and household characteristics. In addition, the 1990 Census and 2005 American Community Survey were also used in the Housing Element to provide additional data and ensure consistency with other regional, state, and federal housing plans.
- *City of Beverly Hills:*
  - *City of Beverly Hills General Plan Technical Background Report (2005)* – Information on infrastructure and environmental constraints.
  - *Economic Profile (2006)* – Economic trends and analysis
  - *Building and Safety Records* – Building permit records and housing complaints.
- *Beverly Hills Unified School District* – population and demographic data.
- *DataQuick Real Estate Information* – Housing Market information, such as rental rates and home sales data.
- *Los Angeles County Assessor's Office* – Parcel map and information on lot size and type of existing structures (apartment buildings, condominiums, single-family homes, etc).
- *Los Angeles Services Authority* – Information regarding special needs populations and their housing needs.
- *Financial Lending Institutions* – Lending patterns for home purchase and home improvement loans.
- *RealQuest* – Information on number of residential units and age of multi-family structures (collected 3/25/2009).
- *State of California:*
  - *California Department of Finance* – population and demographic data.
  - *California Employment Development Department* – population and demographic data.
  - *California Department of Housing and Urban Development (HUD)* – population and demographic data.

## COMMUNITY PROFILE

To better understand the housing needs of Beverly Hills community members, a community profile was completed. This profile provides population estimates, household and income characteristics, and an analysis of housing needs. This assessment serves as part of the foundation on which housing programs for the 2006-2014 planning cycle may be based.

### Population Characteristics

The City's resident population has remained relatively stable over time, sustaining a steady increase since the 1930s, with a leveling off during the 1970s. Table 1 shows Beverly Hills' population as enumerated over the last 27 years and compares its population changes with those of neighboring cities, and Los Angeles County. Between 1980 and 1990, Beverly Hills experienced a slight decrease in population. Specifically, the City's population decreased approximately 1 percent between 1980 and 1990. More recently however, Beverly Hills has experienced a modest increase in the level of growth. Between 1990 and 2000, the City's population grew by almost 6-percent and increased another 6 percent from 2000 to 2007.

**Table 1 Population Growth 1980-2007, Neighboring Communities and Los Angeles County**

Jurisdiction	1980	1990	% Change '80-'90	2000	% Change 1990-2000	2007	% Change '00-'07
Beverly Hills	32,367	31,971	-1.2%	33,784	5.7%	36,084	6.8%
Santa Monica	88,314	86,905	-1.6%	84,084	-3.2%	91,124	8.3%
Culver City	38,139	38,793	1.7%	38,816	0.1%	40,792	5.1%
West Hollywood	*2	36,118	n/a	35,716	-1.1%	37,653	5.4%
LA City	2,966,850	3,485,398	17.5%	3,694,820	6.0%	4,018,080	8.7%
LA County	7,477,503	8,863,164	18.5%	9,519,338	7.4%	10,331,939	8.5%

SOURCE: U.S. Census of Population and Housing 1980, 1990, 2000 and California Department of Finance, January 2007

The Southern California Association of Governments (SCAG), as part of its mandated planning functions, has developed population and employment projections for each jurisdiction in the region.

<sup>2</sup> West Hollywood was not incorporated until 1984, prior to this the West Hollywood area was included in the Los Angeles County population growth estimates.

According to SCAG projections, Beverly Hills is expected to experience only moderate levels of new growth over the next decade, with population levels increasing by 2 percent to 36,642 persons by 2015.

### **Age Composition**

The age characteristics of a community have important effects on housing demand. Different age groups have distinct lifestyles, income levels, and family types and sizes that influence preferences and ability to afford housing. These housing choices evolve over time; therefore, evaluating the age characteristics of a community is important in addressing housing needs of residents.

Several trends with regard to age characteristics have occurred in the community from 1990 to 2000. One of the most dramatic changes was the size of the preschool and school age children population, which increased significantly both in proportion and number from 1990 to 2000 (Table 2). The number of children less than five years old increased by 22-percent during 1990 to 2000. During the same period, school-aged children (ages 5-18) increased by 43-percent. Collectively, the proportion of children under age 18 increased by 39-percent, representing an increase of approximately 2,082 children in the community.

<b>Age</b>	<b>1990</b>		<b>2000</b>		<b>% Change 1990-2000</b>
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>	
Preschool 0-4	1,038	3.2	1,266	3.7	22.0
School Age 5-18	4,305	13.5	6,161	18.2	43.1
Young Adults 19-34	6,892	21.5	6,237	18.5	(9.5)
Older Adults 35-64	13,291	41.6	14,171	41.9	6.6
Seniors 65/+	6,445	20.2	5,949	17.6	(7.7)
<b>Total</b>	<b>31,971</b>	<b>100.0</b>	<b>33,784</b>	<b>100.0</b>	<b>5.3</b>

SOURCE: U.S. Census 1990 and 2000

In contrast, the number of young adults between ages 19 and 34 decreased by approximately 9-percent between 1990 and 2000. This age group typically consists of students, recent graduates, or adults in the early stages of their careers that are seeking more affordable housing opportunities such as rental units, condominiums, or smaller single-family homes. However, older adults between ages 35 and 64 increased by almost 7 percent between 1990 and 2000. Adults in the lower range of this age group are typically more settled in their careers, starting to raise families and may seek larger, move-

up housing opportunities. Persons age 65 or more decreased between 1990 and 2000, for an overall decrease of almost 8 percent. However, while the overall proportion of seniors decreased in Beverly Hills, this age group remains a significant portion of the community, accounting for almost 18 percent of residents. Attention must be paid to the housing needs of older residents who as they age, may require smaller, more affordable housing near transportation and supportive services

### ***Race and Ethnicity***

Los Angeles County has become increasingly diverse in terms of race, culture, and ethnicity over the past decade. These changes can have important implications on the nature and extent of housing needs since different racial and ethnic groups may have different household characteristics and cultural backgrounds that affect their needs and preferences for housing.

As displayed in Table 3, although the population of Beverly Hills remains primarily comprised of non-Hispanic White residents, it has become more ethnically and racially diverse since 1990. In 1990, non-Hispanic White residents comprised 91 percent of the population, compared to 85 percent in 2000. In contrast, the share of Asian residents increased from 5 percent in 1990 to 7 percent in 2000. The proportion of African American or Hispanic residents did not increase substantially over this time period. Compared to Los Angeles County as a whole, the City's share of African-American, Asian, Hispanic, and other minority residents is significantly lower.

A slightly larger percentage of Beverly Hills residents were foreign born (38-percent) in 2000 than in the county as a whole (36-percent). Although not a racial category, the ancestries of Beverly Hills residents are quite diverse although the Census categories do not provide the ancestries of many—over 48-percent of residents selected the category “other ancestry.” The next largest group reported was Russian ancestry (9-percent), followed by American ancestry (6-percent) and German ancestry (5-percent). The remaining 32-percent reported a wide range of ancestries.

Many different first languages are spoken by Beverly Hills residents, with 44-percent of the population over the age of five reporting a language other than English spoken at home. Of this group, 37-percent are described as speaking English less than very well.

**Table 3 Ethnicity of Population for Beverly Hills and Los Angeles County, 1990-2000**

Race	2000		1990	
	Percent	Number	Percent	Number
<b>Beverly Hills</b>				
White	85.10%	28,735	91.30%	29,182
African American	1.80%	597	1.70%	543
American Indian	0.10%	43	0.20%	59
Asian	7.10%	2,383	5.50%	1,745
Native Hawaiian	0.00%	10	0	n/a
Other	1.50%	508	1.40%	442
Two or more	4.5%	1,507	n/a	n/a
<b>Total</b>	<b>100.00%</b>	<b>33,784</b>	<b>100.00%</b>	<b>31,971</b>
Hispanic	4.60%	1,565	5.40%	1,725
<b>Los Angeles County</b>				
White	48.70%	4,637,062	56.80%	5,035,103
African American	9.80%	930,957	11.20%	992,974
American Indian	0.80%	76,968	0.50%	45,508
Asian	11.90%	1,137,500	10.80%	954,485
Native Hawaiian	0.30%	27,053		n/a
Other	23.50%	2,239,997	20.70%	1,835,094
Two or more	4.90%	469,781	n/a	n/a
<b>Total</b>	<b>100.00%</b>	<b>9,519,338</b>	<b>100.00%</b>	<b>8,863,164</b>
Hispanic	44.60%	4,242,213	37.80%	3,351,242

SOURCE: 1990, 2000 U.S. Census of Population and Housing

Because of increasing marriage among members of different racial/ethnic groups, resulting in the growing number of multi-race children, the 2000 Census introduced a new category—"two or more races." This marked the first time that respondents were allowed to select more than one race in the Census. This recent Census category has become more important, particularly in ethnically and racially diverse areas such as Southern California. According to the 2000 Census, approximately 4-percent of Beverly Hills residents identified themselves as being of mixed racial/ethnic heritage.

As displayed in Table 4, the trend of greater racial and ethnic diversity in the community is reflected in an examination of school enrollment data from the Beverly Hills Unified School District since 1995. The District operates one high school, one alternative high school (grades 9-12), four elementary schools (grades K-8), and one adult school within the District that provide school services to Beverly Hills residents. In addition, there are eight private schools operating

in the City of Beverly Hills. Information on racial and ethnic composition is not available from these schools.

Ethnicity	1995/96		2005/06		% Change 1990-2000
	Number	Percent	Number	Percent	
White	4,205	81.2%	3,930	74.2%	-6.5%
Asian	550	10.6%	790	14.9%	43.6%
Hispanic	194	3.7%	224	4.2%	15.5%
African American	225	4.3%	238	4.5%	5.7%
American Indian	4	0.1%	2	0.0%	-50%
Multiple/No Response	n/a	n/a	113	2.1%	n/a
<b>Total</b>	<b>5,178</b>	<b>100%</b>	<b>5,297</b>	<b>100%</b>	<b>2.3%</b>

SOURCE: California Department of Education, 2006

According to school enrollment data, there have been changes in the racial and ethnic composition of Beverly Hills students over the past ten years. While non-Hispanic Whites students remain the majority of all students enrolled, the proportion of non-Hispanic White students decreased from 81-percent in 1995/96 to 74-percent in 2005/06. In contrast, the number of Asian students enrolled during the same period increased from 11-percent to 15-percent. The number of Hispanic and African American students remained relatively stable, each accounting for approximately 4 percent of all students enrolled.

### **Employment**

Highly correlated to household income, employment has an important impact on housing needs. Higher-paying jobs provide broader housing opportunities for residents, while lower-paying jobs limit housing options. In addition, employment growth is a major factor affecting the demand for housing in a community.

Beverly Hills is a major employment center and part of a larger concentration of economic activity in the Westside area of Los Angeles County. Beverly Hills has a high concentration of jobs due in part to its central location along the Wilshire Boulevard corridor. There are 3.8 jobs per housing unit in Beverly Hills as compared to 1.4 in Los Angeles County as whole in 2006.<sup>3</sup> As shown in Table H 5 (Beverly Hills Jobs and Pay by Industry Group, 2004 Industry Employers Jobs Payroll Avg. Pay), a variety of employment opportunities are available in Beverly Hills; many of these employers pay high wages.

<sup>3</sup> *Beverly Hills Economic Profile: Sharpening the Competitive Edge*. MBIA MuniServices Co. June 2006.

The average wage in Beverly Hills was approximately \$80,000 in 2004; by comparison, the average wage in Los Angeles County was \$44,000. Not all jobs in Beverly Hills are targeted towards upper-income occupations however, and so the average wage in Beverly Hills being higher than the county average does not mean that all jobs in the city earn a higher income. Many service industry jobs are also located within the community and these industries typically pay lower wages.

The largest industry group in Beverly Hills based on number of jobs is the retail sector, followed by the health industry, entertainment, business services, restaurants, professional, and finance occupations. Retail pay levels are relatively low compared with other large industry groups, so this industry ranks fifth in terms of payroll levels. The health care sector employs 12-percent of workers in Beverly Hills. These employers include doctors, nursing facilities, health aides, laboratories, and outpatient health services. Average pay is also below average in this sector due to the many low-skilled workers who perform basic service jobs. Most of these workers likely commute from places outside the City. Eight-percent of workers are employed by restaurants. Restaurants are the lowest paying industry group. The average pay for this sector is \$22,000; by comparison, the average pay citywide is over \$80,000.

Higher paying jobs include those in the entertainment industry, professional service, and finance sectors. Together, these three sectors provide 25-percent of jobs in the City. The Entertainment sector, which includes talent agents, entertainers, producers, and post production, provides eleven-percent of jobs. The Professional Services sector, which includes law firms, architects, engineers, accountants, advertising agencies, and consultants, provides seven-percent of jobs. While the finance sector, which includes security brokers, investment advisers, portfolio managers, holding companies, and banks provides another seven-percent of jobs.

<b>Table 5 Beverly Hills Jobs and Pay by Industry Group, 2004 Industry Employers Jobs Payroll Average Pay</b>				
<b>Industry</b>	<b>Employers</b>	<b>Jobs</b>	<b>Payroll</b>	<b>Average Pay</b>
Retail	392	6,487	\$293,262,052	\$45,208
Health	897	5,216	\$312,838,444	\$59,981
Entertainment	813	5,048	\$1,220,890,314	\$241,860
Business Services	484	3,978	\$270,321,796	\$67,958
Restaurants <sup>4</sup>	142	3,550	\$79,090,851	\$22,278
Finance	264	3,113	\$490,517,826	\$157,596
Professionals	726	3,282	\$309,822,061	\$94,408
Real Estate	481	2,356	\$146,691,576	\$62,260
Services	204	1,987	\$51,386,337	\$25,858
Tourism	63	2,873	\$96,627,911	\$33,636
Government	2	1,684	\$120,258,647	\$71,412
Household	1,039	1,481	\$39,253,878	\$26,512
Education	18	902	\$36,218,158	\$40,168
Beauty	93	797	\$22,517,354	\$28,247
Construction	49	626	\$61,493,898	\$98,159
Wholesale	144	625	\$39,528,598	\$63,240
Computer	74	483	\$34,136,212	\$70,647
Industrial	48	308	\$15,326,101	\$49,809
Insurance	64	269	\$23,508,448	\$87,239
Nonprofit	37	206	\$9,075,372	\$43,966
Recreation	31	197	\$6,882,965	\$34,934
Transportation	21	121	\$4,974,329	\$41,157
Communications	10	110	\$6,776,069	\$61,601
<b>Total</b>	<b>6,103</b>	<b>45,719</b>	<b>\$3,692,106,435</b>	<b>\$80,757</b>

SOURCE: *Beverly Hills Economic Profile: Sharpening the Competitive Edge*. MBIA MuniServices Co. June 2006, based on QCEW and Beverly Hills data.

## Household Characteristics

The characteristics of a community's households impact the type of housing needed in that community. Household type, income level, and the presence of special needs populations are all factors that affect the housing needs of a community. The U.S. Census defines a household as all persons who occupy a housing unit, that may include families, an nonfamily households such as unrelated individuals living together (such as roommates), and persons that live alone. Persons living in group environments such as convalescent homes, dormitories, or other group living environments are not considered households.

<sup>4</sup> Restaurant pay excludes tips.

**Household Composition and Size**

As shown in Table 6, over half (55-percent) of all households in Beverly Hills in 2000 were comprised of families. Single person households comprised 38-percent of households while 7-percent were nonfamily households. Households of all types that include children under age 18 comprised over one quarter of all households in 2000. Among all family types, families with young children have shown the greatest increase since 1990. Married couple families with children increased from 16-percent in 1990 to 18-percent in 2000, while female-headed households with children increased from 4-percent to 8-percent. Male-headed households within children continued to comprise 1-percent of all households in the community.

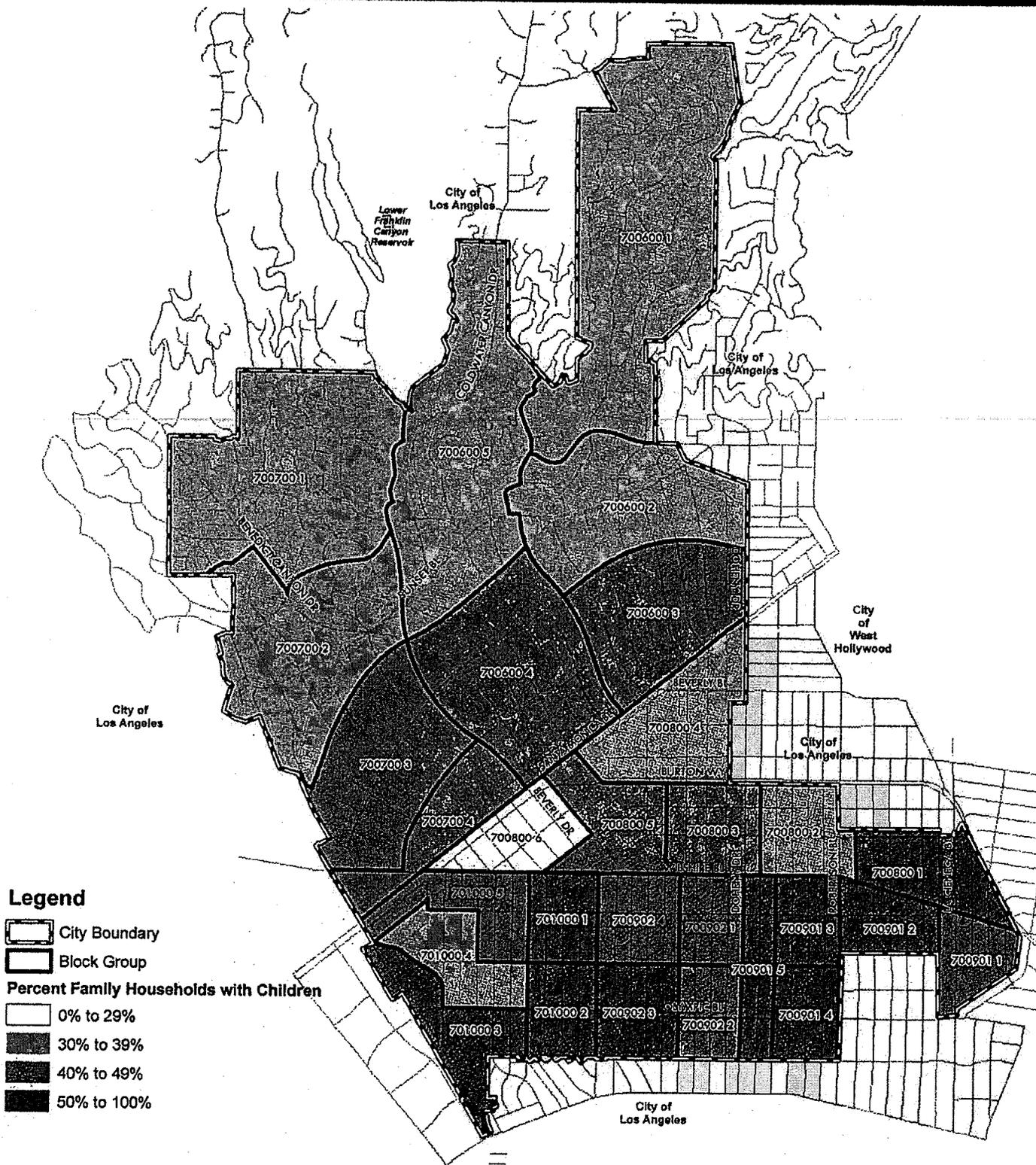
Table 6 Household Size and Type, 1990-2000, City of Beverly Hills				
Type of Household	1990		2000	
	Number of Households	Percent of Total Households	Number of Households	Percent of Total Households
<b>1 Person</b>	<b>5,548</b>	<b>38.1%</b>	<b>5,737</b>	<b>38.2</b>
Male	1,727	11.8%	2,012	13.4%
Female	3,821	26.2%	3,725	24.8%
<b>2+ Persons</b>	<b>8,024</b>	<b>55.1%</b>	<b>8,263</b>	<b>55.0%</b>
Married Couple Family	6,463	44.4%	6,584	43.8%
-With children < 18 yrs	2,305	15.8%	2,822	18.8%
-With no children < 18	4,158	28.5%	3,762	25.0%
<b>Nonfamily Households<sup>5</sup></b>	<b>992</b>	<b>6.8%</b>	<b>1,035</b>	<b>6.9%</b>
Male Householder	481	3.3%	480	3.2%
Female Householder	511	3.5%	555	3.7%
<b>Total Households</b>	<b>14,564</b>	<b>100%</b>	<b>15,035</b>	<b>100%</b>
<b>Other Families</b>	<b>1,561</b>	<b>10.7%</b>	<b>1,679</b>	<b>11.2%</b>
Male householder (no wife)	385	2.6%	456	3.0%
-With children < 18 yrs	148	1.0%	180	1.2%
-With no children < 18 yrs	237	1.6%	276	1.8%
Female householder (no husband)	1,176	8.1%	1,223	1.8%
-With children < 18 yrs	590	4.1%	661	8.1%
-With no children < 18 yrs	586	4.0%	562	3.7%

SOURCE: 1990 and 2000 U. S. Census of Population and Housing (SF3 P10)

<sup>5</sup> A non-family household consists of a householder living alone, or a householder who shares the home exclusively with people to whom he or she is not related such as roommates.

# FAMILY HOUSEHOLDS WITH CHILDREN

Beverly Hills General Plan



Source: US Census Bureau, Census 2000 Summary File 1

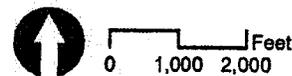


Figure H 1



As shown in Figure H 1 (Family Households with Children), most census tracts in the community have a significant proportion of households with children. Census tracts with a high concentration of family households (over 50 percent) are located south of Wilshire Boulevard.<sup>6</sup>

Table 7 displays the total number of households in Beverly Hills in 1990 and 2000 by household size. Household size can be another important indicator of housing need. The presence of families with children, students, and elderly persons, among other groups, can have different effects on the household size in a community. For example, household size is larger on average in communities where many households are families with children, compared to those where the elderly population is significant. In either case, understanding the average household size can help identify the type of housing necessary in a community.

The vast majority (68-percent) of all households in Beverly Hills is comprised of one and two-person households, with the remaining 32-percent of households consisting of three or more persons. This proportion of one-person households has remained relatively stable from 1990 and 2000. However, the share of households of three or more has increased from 29-percent in 1990 to 32-percent in 2000. Conversely, the share of two-person households decreased from almost 33-percent to 30-percent during the same time period.

<b>Table 7 Household Size, 1990 and 2000 City of Beverly Hills</b>				
<b>Persons in Household</b>	<b>Households</b>			
	<b>1990</b>		<b>2000</b>	
	<b>Number</b>	<b>Percent</b>	<b>Number</b>	<b>Percent</b>
1	5,548	38.1	5,737	38.2
2	4,741	32.6	4,515	30.0
3	1,739	11.9	1,897	12.6
4	1,498	10.3	1,678	11.2
5	710	4.9	846	5.6
6 or more	328	2.2	362	2.4
<b>Total</b>	<b>14,564</b>	<b>100.00</b>	<b>15,035</b>	<b>100.0</b>
Average Household Size	2.19		2.24	

SOURCE: Compiled by Beverly Hills Community Development Dept. from U.S. Census of Population and Housing 1990 (SF-1) and 2000 (SF1 H13)

According to the 2000 Census, average household size in Beverly Hills was 2.24, increasing from 2.19 in 1990. This trend is

<sup>6</sup> It is important to note that while there are no residential uses in the western most portion of Block Group 700700 3, the map is showing a concentration in that portion of the City since the entire Block Group is displayed.

reflective of the growing number of family households with children in the community. However, it should be noted that the average household size in Beverly Hills remains significantly lower than the countywide average of 2.98.

### ***Overcrowding***

A housing unit that is occupied by more than one person per room (excluding kitchens, bathrooms, hallways and porches) is defined by U.S. Department of Housing and Urban Development (HUD) as being overcrowded. A housing unit with more than 1.5 persons per room is considered to be severely overcrowded.

Overcrowding occurs when the relatively high cost of housing either forces a household to double up with another household or live in a smaller housing unit to be able to afford food and other basic needs. Overcrowding can also occur if a community lacks housing units of adequate size to meet the need of large households. In either case, overcrowding can potentially lead to more rapid deterioration of homes, more traffic, and a shortage of on-site parking.

In 2000, 1,000 dwelling units in Beverly Hills, or 7 percent of the 15,032 occupied units, had more than 1.01 persons per room. Of the overcrowded units in Beverly Hills, 81-percent were renter-occupied dwellings. The amount of overcrowded dwellings in the City has increased since 1990 when 5-percent (653) of all units were overcrowded. The increase in overcrowding has also occurred countywide. In 2000, the countywide overcrowding rate was 23-percent, rising from 19-percent in 1990. Approximately 5-percent of renter households and less than 1-percent of owner households were severely overcrowded.

### ***Household Employment Characteristics***

The ability of a household to acquire adequate housing is almost solely dependent on the income of the household. Household income is oftentimes the crucial factor in evaluating the size and type of housing available for any given household. Household income can vary greatly across many demographic factors, including race, gender, and household type.

According to the 2000 Census, the per capita income in Beverly Hills was \$65,507, more than three times the county per capita income of \$20,683. The median household income in the community was \$70,945; the 17<sup>th</sup> highest in Los Angeles County. The 2000 Beverly Hills median household, family, and nonfamily

household incomes are compared with the county and state in Table 8.

Area	Median Household Income	Median Family Income	Median Nonfamily Household Income
Beverly Hills	\$70,945	\$102,611	\$49,394
Los Angeles County	\$42,189	\$46,452	\$30,917
California	\$47,493	\$ 53,025	\$32,024

SOURCE: 2000 US Census

Table 9 provides information on median-family income by household family type. As shown, household type and income levels vary considerably by household family type. Within Beverly Hills, the lowest income levels are for families headed by women who have children and no spouse (\$35,294). The highest household income is for married-couple families with children (\$120,987).

Family Type	Median Income
All families	\$102,611
<i>Married-Couple Families</i>	
-With Children	\$120,987
-No Children	\$114,929
<i>Other Family</i>	
Male Householder, no spouse:	
-With Children	\$83,945
-No Children	\$84,420
Female Householder, no spouse:	
-With Children	\$35,294
-No Children	\$45,179

SOURCE: 2000 U.S. Census of Population and Housing

### **Income**

In discussing lower-income households, it is important to identify the income levels associated with labels such as “extremely low,” “very low,” “low” or “moderate” income. These are usually defined as annual household incomes not exceeding a percentage of the median family income identified annually by the Department of Housing and Urban Development (HUD) for the Los Angeles-Long Beach Metropolitan area, which was \$63,000 in 2010.

For planning and funding purposes, the California Department of Housing and Community Development (HCD) categorizes households into five income groups based on county area median income (AMI):

- Extremely Low Income—up to 30 percent of county area median income
- Very Low Income—31-50 percent of county area median income
- Low Income—51-80 percent of county area median income
- Moderate Income—81-120 percent of county area median income
- Above Moderate Income—greater than 120 percent of county area median income

Special-income data based on the 2000 Census developed by the Department of Housing and Urban Development (HUD) is used to provide an overview of income distribution by household type, tenure and cost burden in Beverly Hills. According to HUD data, 8-percent of the City's total households in 2000 were Extremely Low Income (0 to 30 percent AMI), 6-percent were Very Low Income (31 to 50-percent AMI), and 8-percent were Low Income (51 to 80 percent AMI). Approximately 77-percent of the households had incomes above 80 percent of the median in 2000 (Table 10, next page).

Certain groups had higher proportion of lower-income households. As shown in Table 10, elderly households had higher proportions of lower-income households than any other household type. Approximately 55-percent of all elderly renter households and 16-percent of elderly owner households earned lower-income levels (earned less than 80 percent AMI).

**Table 10 Household Income Profile and Cost Burden<sup>7</sup> by Household Type, Beverly Hills 2006**

Households	Renters				Owners				Total Households
	Elderly	Small Families	Large Families	Total Renters	Elderly	Small Families	Large Families	Total Owners	
<b>Extremely Low Income (0-30% AMI)</b>	<b>313</b>	<b>305</b>	<b>55</b>	<b>942</b>	<b>139</b>	<b>94</b>	<b>25</b>	<b>318</b>	<b>1,260</b>
Housing Cost Burden >30%	229	160	45	584	105	79	25	219	63.7
<b>Very Low Income (31-50% AMI)</b>	<b>295</b>	<b>125</b>	<b>24</b>	<b>779</b>	<b>79</b>	<b>39</b>	<b>19</b>	<b>147</b>	<b>926</b>
Housing Cost Burden >30%	260	115	24	714	79	39	19	133	802
<b>Low Income (51-80% AMI)</b>	<b>308</b>	<b>210</b>	<b>33</b>	<b>951</b>	<b>169</b>	<b>69</b>	<b>40</b>	<b>308</b>	<b>1,259</b>
Housing Cost Burden >30%	258	210	33	817	119	59	40	247	1,065
<b>Moderate Income and Upper Income (81%+ AMI)</b>	<b>740</b>	<b>1,700</b>	<b>305</b>	<b>5,825</b>	<b>2,089</b>	<b>2,569</b>	<b>720</b>	<b>5,752</b>	<b>11,577</b>
Housing Cost Burden >30%	205	479	125	1,520	319	943	330	1,731	3,253
<b>Total</b>	<b>1,656</b>	<b>2,340</b>	<b>417</b>	<b>8,497</b>	<b>2,476</b>	<b>2,771</b>	<b>804</b>	<b>6,525</b>	<b>15,022</b>
Housing Cost Burden >30%	952	964	223	3,637	621	1,122	414	2,349	5,979

SOURCE: 2006 HUD CHAS Data Book. Based on 2000 Census  
Definitions: Small Renter households (2 to 4 members)  
Large Families (5 or more members)

Figure H 2 (Low/Moderate-Income Areas) shows the areas of concentrated low and moderate-income households in Beverly Hills. Areas with a concentration of low and moderate income are census block groups with 51-percent or more of households earning low and moderate income (120-percent or less of AMI). These four census blocks are located south of North Santa Monica Boulevard.

*Needs of Extremely Low Income Households*

Housing Element statutes now require an analysis of the needs of extremely low income (<30% AMI) households, and programs to assist in the creation of housing for this population. Table 10A highlights the existing housing needs of Beverly Hills' extremely low income (ELI) population. As indicated by this Table, Beverly Hills had an estimated 1,260 ELI households in 2000, representing eight percent of the community's total households. Three-quarters of ELI households are renters (942 households) and one-quarter are homeowners (318 households). Both ELI renters and owners

<sup>7</sup> **Cost burden** is the fraction of a household's total gross income spent on housing. For renters, housing costs include rent paid by the tenant plus utilities. For owners, housing costs include the mortgage payment, taxes, insurance, and utilities.

experience a high degree of housing problems<sup>8</sup> primarily related to housing overpayment.

**Table 10A Housing Needs for Extremely Low Income Households**

	Renters	Owners	Total
<b>Total Number of ELI Households</b>	942	318	1,260
<b>Percent with Any Housing Problems</b>	65%	69%	66%
<b>Percent with Cost Burden (&gt;30% Income on housing)</b>	62%	69%	64%
<b>Percent with Severe Cost Burden (&gt;50% Income on housing)</b>	61%	69%	63%
<b>Total Number of Households</b>	8,497	6,525	15,022

**Source: HUD Comprehensive Housing Affordability Strategy (CHAS), based on 2000 Census.**

As indicated earlier in Table 10, seniors comprise over one-third of ELI households in the City. The Housing Element establishes the following programs to help address the housing affordability needs of this group:

- Senior Housing Development
- Rent Stabilization
- Senior Case Management
- Senior Home Sharing
- Second Units
- Home Repair and Improvement
- Monitoring Affordable Housing
- Housing Trust Fund

In addition to these programs, many of which assist non-seniors, the following Housing Element programs are focused on providing a variety of affordable housing options for Beverly Hills' non-senior ELI households: Zoning for Special Needs Housing (including transitional housing, supportive housing, emergency shelters, SROs, and community care facilities); and Funding for Homeless Services.

### **Housing Cost Burden**

Housing cost burden occurs when the cost of a desired unit is greater than the monthly affordable rent or mortgage payment for that household. Though it is not uncommon to overpay for housing, maintaining a reasonable level of cost burden, especially among

<sup>8</sup> The fact that between 60 to 70 percent of ELI renters and owners are spending greater than half their income on housing cost (severe cost burden) indicates housing affordability is a significant issue for Beverly Hills' ELI population.

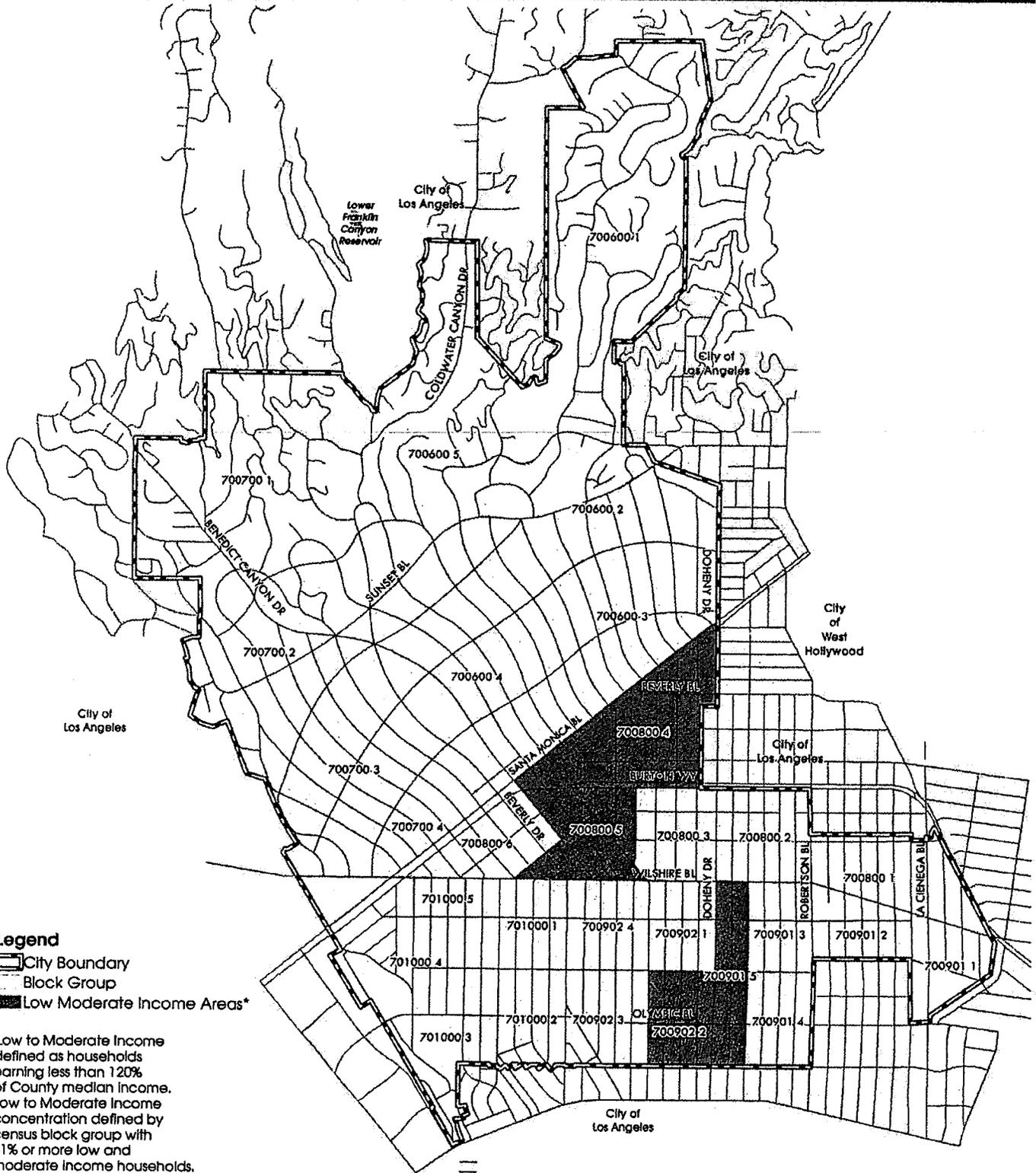
lower-income households, is an important goal. Housing cost burden is defined as a

According to the 2007 CHAS data presented in Table 10, 36-percent of Beverly Hills home owners and 43-percent of renter households had a housing cost burden in 2000. This translates into 3,637 renter households and 2,349 owner households in the community.

However, this level of cost burden for households is not unique to Beverly Hills. Housing costs have been rising in California and Los Angeles County as a whole over the past decade. In 2000, 38-percent of all Los Angeles households paid more than 30-percent of their income on housing, including 33-percent of owners and 42-percent of renter households. Approximately 34-percent of all California households paid more than 30-percent of their income towards housing costs according to 2007 CHAS data.

# LOW/MODERATE INCOME AREAS

## Beverly Hills General Plan



Source: US Census Bureau, Census 2000 Summary File 1

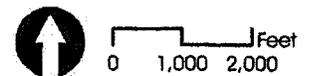


Figure H 2



### Special Needs Groups

There are certain segments of the population that may have greater difficulty in finding decent, affordable housing due to special circumstances. Special circumstances may be related to employment and income, family characteristics, disability, and household characteristics among others. State Housing Element law defines "special needs" groups to include the following: senior households, disabled persons, large households, single-parent families with children, homeless people, and farm workers.

#### **Senior Households**

The special housing needs of the elderly (age 65 and older) are an important concern for the City of Beverly Hills, due to the significant proportion of senior households in the community and since many retired persons are likely to be on fixed incomes. In addition, the elderly may have special requirements related to housing construction and location.

According to the 2000 Census 27-percent (4,060) of households in Beverly Hills were headed by persons aged 65 years and older. Figure H 3 (Senior-Headed Households) displays the location of senior-headed households in the City.<sup>9</sup> Of these households, 64-percent were renters and 36-percent owned their own home. Over 66-percent of residents aged 65 or more lived in family households, while 30-percent lived alone. Of those residents aged 65 or more who lived alone, 77-percent were women. As mentioned earlier, among all household types, a higher proportion of seniors earned very low- and low-incomes than any other household type. Approximately 55-percent of all senior renter households and 16-percent of owner households earned less than 80-percent of the area median income.

To help meet the special housing needs of senior households, the City offers a variety of programs and services for senior residents. These include the Senior Case Management Program administered by Jewish Family Services that assists seniors to live as independently as possible in the community. Seniors are linked to various services such as shuttle buses and discount taxi coupons, meal services, caregivers, assistance with government forms, and counseling. The City also contracts with Jewish Family Services to offer a senior

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<sup>9</sup> It is important to note that while there are no residential uses in the western most portion of Block Group 700700 3, the map is showing a concentration in that portion of the City since the entire Block Group is displayed.

Handworker Program for low income tenants and homeowners. A roommate matching service for seniors is offered through Alternative Living for the Aged. Through the Beverly Hills Community Services Department, a variety of programs and supportive services are also offered including classes and information programs, free transit shuttle services, case management, legal counseling, and lunch services.

The City's existing assisted housing stock includes the 150 unit Beverly Hills Senior Housing project that provides affordable housing to very low-income senior/handicapped residents. The project was constructed in 1987 and fully rented in 1988. Located at 225 N. Crescent Drive (Wholefoods Grocery), the project was a joint development by the City and the nonprofit Beverly Hills Senior Citizen Housing Corporation (now Menorah Housing). In addition to funding the public parking and market portions of the structure, the City provided the housing portion the nine-lot site and funding (general fund, CDBG, and Jobs Bill funds) to support feasibility studies, environmental review, legal fees, site clearance and preparation, partial excavation, off-site improvements, and amenities beyond those allowed by the federal Section 202 program.

### Persons with Disabilities

Disabled persons have special housing needs because of their typically fixed- and lower-income, the lack of accessible and affordable housing, and the higher health care costs associated with their disability.

The Census defines a "disability" as a long lasting physical, mental, or emotional condition. According to the Census, 15,922 persons with one or more disabilities resided in Beverly Hills in 2000, representing almost 18-percent of the City's residents over five years of age. Of the population with disabilities, 2,274 were seniors; seniors comprise 38-percent of the City's population with disabilities (Table 11).

<b>Age</b>	<b>Persons</b>	<b>Percent</b>
5-15	96	2.1%
16-64	3,383	15.3%
65+	2,274	37.9%
<b>Total</b>	<b>5,753</b>	<b>17.6%</b>

SOURCE: 2000 Census SF3: P53, P77, P80

The living arrangement of disabled persons depends on the severity of the disability. Many persons with disabilities live at home

In an independent fashion or with other family members. Independent living can be furthered through special housing features for the disabled, income support for those who are unable to work, and in-home supportive services for persons with medical conditions, among others. Other persons with disabilities live in group homes or other institutionalized settings.

For individuals unable to live in a primarily independent setting, two elderly residential community-care facilities are located within Beverly Hills:

- Bridge Port Assisted Living (75 units)
- Sunrise Assisted Living (127 units)

These facilities provide residential support and supportive services for such daily tasks as medication management, coordination of health care services and customized diets, housekeeping, laundry and transportation needs.

### **Single-Parent Households**

Single-parent households, especially female-headed households, are generally characterized by lower-incomes and a greater need for affordable housing. In addition, these households can have needs such as accessible day care and health care, as well as other supportive services. The relatively low incomes earned by single-parent households, combined with the need for supportive services, severely limit the housing options available to them.

The 2000 Census reported 841 single-parent households with children under age 18 in Beverly Hills, representing approximately 5.5-percent of all households in the City. Of these single-parent households, 661 were female-headed households and 180 were male-headed households with children.

The number and proportion of single-parent families in Beverly Hills had increased modestly since 1990. In 1990 738 single-parent (148 male-headed and 590 female-headed) households resided in the community, representing 5 percent of all households. In 2000, 11-percent of all Los Angeles County households were comprised of single parent households raising children under the age of 18. In contrast, 9-percent of all households countywide were comprised of single parent households with children in 1990.

### **Large Households**

Large households, defined as households with five or more members, have special needs due to the limited availability of adequately sized affordable housing units. Larger units can be very expensive,

which often results in large households residing in smaller, less expensive units or doubling up with another family or other persons to save on housing costs, both of which result in unit overcrowding.

The 2000 Census identified 1,208 large households in Beverly Hills, representing approximately 8 percent of all households. Among the City's large households, 69-percent were owner-households, while 31-percent rented their home. While the proportion of large households in the community has not increased significantly since 1990, the overall share of large renter households in Beverly Hills has increased. In comparison, Beverly Hills had 1,038 large households, accounting for 7-percent of all households in the community in 1990. Of these households, 74-percent of the large households were owners and 26 percent were renters in 1990.

In comparison to Los Angeles County as a whole, the proportion of large households in Beverly Hills remains small. Countywide in 1990, 17-percent of all households had five or more members; by 2000, this proportion had increased to 19-percent.

### **Farm Workers**

Farm workers are identified as persons whose primary income is earned through seasonal agricultural labor. Housing needs for farm workers are a function of their relatively low incomes and the unstable nature of their jobs. In 2000, 22 persons were employed in farming, forestry, and fishing occupations, accounting for only 0.1 percent of the City labor force. These occupations include gardeners, landscapers, and persons who work in plant nurseries. Given that no farming operation is located in or near Beverly Hills, housing for farm workers is not identified as a need in the City.

### **Homeless Persons**

During the period of January 27 to 29, 2009, the Los Angeles Homeless Services Authority (LAHSA) conducted the 2009 Greater Los Angeles Homeless Count. This homeless census was one of the largest community enumerations ever performed and involved canvassing over 500 census tracts over the three-night period, information collected from shelters and institutions, telephone surveys, in-person surveys and a sophisticated statistical analysis used to project homelessness in non-enumerated areas.

According to the Greater Los Angeles Homeless Count, the overall homeless population of the Los Angeles Continuum of Care

(CoC) at a given point in time is estimated to be 42,694 people.<sup>10</sup> This represents a decrease of 38 percent when compared to the total number of homeless persons in LAHSA's 2007 Homeless Count, a reflection both of enhancements to the data collection process and new and expanded homeless programs implemented by the CoC network of housing and service providers.

Among the approximately 43,000 homeless within the Los Angeles CoC, two-thirds were unsheltered and one-third was living in either emergency shelters or transitional housing programs at the time of the census. As shown in Table 12, according to LAHSA, the West Los Angeles Service Planning Area (SPA 5) which includes the cities of Beverly Hills, Culver City, Santa Monica, Malibu and west Los Angeles, has an estimated 5,538 point-in-time homeless individuals, approximately 70 percent who are unsheltered. The most prevalent subpopulation of homeless in West Los Angeles is persons with substance abuse problems (43%), followed by persons with mental illness (27%), veterans (16%), and victims of domestic violence (9%).

Within the City of Beverly Hills, the 2009 Homeless Count estimated there to be 42 homeless. Similarly, the CLASP homeless outreach team estimates there to be 40 to 50 homeless who regularly reside in Beverly Hills, many of whom struggle with mental illness. Beverly Hills launched the CLASP (Changing Lives and Sharing Places) program in January 2008, providing street outreach workers through Step up on Second to assess the particular needs of homeless individuals, and to refer them to the appropriate services. Depending on individual needs, social service referrals include mental health counseling, medical care and access to benefits, vocational training, drug rehabilitation and transitional housing.

The City of Beverly Hills contracts with PATH (People Assisting the Homeless) to provide emergency housing for homeless individuals going through the CLASP program. In 2010/11, the City awarded PATH over \$50,000 in Community Assistance Grant funding (General Fund) to provide 1,000 bed nights to the homeless. PATH operates three facilities, totaling 195 beds; it utilizes to house homeless on the Westside, and directs individuals to the appropriate facility based on the nature of their needs. Table 12 provides an

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<sup>10</sup> An additional 5,359 homeless people counted in the cities of Pasadena, Glendale, and Long Beach (distinct separate Continuums in Los Angeles County) increase the estimated homeless population for the entire county of Los Angeles at a point in time to 48,053.

inventory of these and other local shelters and services which serve the homeless in the Westside area.

Throughout the years, the City has provided both Community Assistance Grant and Community Development Block Grant funds to various homeless service providers. These funds have been used to support the construction of the New Directions' Regional Center for Homeless Veterans at the West Los Angeles Administration facility, and to support PATH's Regional Homeless Center in Los Angeles. Most recently, the City pledged \$200,000 to support the opening of Upward Bound House, a transitional living center for families with children located in Culver City.

Through its annual Community Services Assistance Grant application, the City allocates General Fund monies to a variety of service organizations that support the City's commitment to the provision of a social service safety net for the most vulnerable members of the community. Many of these organizations serve the homeless and at-risk homeless population. For example, in 2010/11, the All Saints Homeless Assistance Program, the Westside Food Bank, PATH (People Assisting the Homeless), and The Maple Mental Health Counseling Center were among the agencies awarded more than \$275,000 in City funds.

Table 12 Estimated Homeless Population <sup>11</sup> in West Los Angeles (SPA 5), 2009	
Subpopulation	Point-In-Time Results
Total	5,538
Sheltered	1,707
Unsheltered	3,831
Chronic Homeless	1,779
Families (Members of)	329
Individuals (Single)	5,209
Persons with AIDS or HIV-related illness	140
Persons with Mental Illness	1,501
Persons with Substance Abuse Problems	2,400
Veterans	891
Victims of Domestic Violence	489
Youth - Unaccompanied (Under 18)	47

SOURCE: Los Angeles Services Authority, 2009 Homeless Count.

<sup>11</sup> A person may fall within more than one identified sub-populations, and therefore the sum of sub-populations exceeds the total homeless estimate.

Table 13 Homeless Services and Facilities, Beverly Hills and Nearby Areas		
Organization	Services	Beds
PATH-Westside Center Transitional Housing 2346 Cotner Ave., Los Angeles	Provides emergency beds to homeless men, women and families. Offers jobs program, case management, life skills and money management workshops.	32
PATH- Hollywood Center 5627 Fernwood Avenue Hollywood	Provides beds for chronically homeless men and women. Residents receive personalized support services that emphasize permanent housing placement.	65
PATH – Regional Homeless Center Transitional Housing 340 N. Madison, Los Angeles	Provides 39 beds for men, 21 beds for individual women, 18 beds in private rooms for men with special needs, and 20 beds for mothers and their children.	98
Upward Bound House Family Shelter, Culver City	Opened in 2010. Provides short term housing for families in crisis. Families undergo case management, counseling and other stabilization services.	18 units (60 beds)
Barrington House New Directions, Inc. Confidential site on the Westside	Provides transitional housing to chronic substance abusing veteran women with multiple disorders.	17
The Serra Project Scattered sites – 1 group home on the Westside	Provides permanent supportive housing to homeless persons and families living with HIV/AIDS or dual diagnosed.	6
The Sober Inn, CLARE Foundation 905 Pico Blvd. Santa Monica	Provides 16-bed transitional housing facility with outreach, intake, and assessment for drug addicted homeless men.	16
All Saints Episcopal Church Homeless Assistance Program 405 N. Camden Dr., Beverly Hills	Provides weekly hot meals, case management and alternatives to living on the street to homeless and at-risk individuals.	
The Los Angeles Free Clinic Beverly Clinic 8405 Beverly Blvd, Los Angeles	The Los Angeles Free Clinic provides high-quality medical and dental care, social services and education and outreach to men, women and children in need.	
Maple Counseling Center 9107 Wilshire Blvd., Beverly Hills	Provides low fee mental health counseling. Senior peer counseling is provided at Roxbury Park for seniors undergoing life transitions related to loss and aging.	
Ocean Park Community Center Santa Monica	Provide emergency housing and services as well as hotel/motel vouchers for the target population. The length of stay in shelters or hotels/motels is 120 days.	
New Directions, Inc. 11303 Wilshire Blvd., VA Bldg. 116 Los Angeles	Provides supportive services, including employment services to homeless veterans with chronic substance abuse and other disorders.	
Westside Food Bank 1710 22nd Street, Santa Monica	Westside Food Bank is a nonprofit agency that serves virtually all Westside nonprofit agencies that have kitchens or food pantry programs.	

SOURCE: Los Angeles Services Authority, 2007. City of Beverly Hills, 2010.

### Housing Stock Characteristics

The Census defines a housing unit as a house, an apartment, a mobile home or trailer, a group of rooms, or a single room occupied as separate living quarters. Separate living quarters are those in which the occupants live separately from any other individuals in the building and which have direct access from outside the building or through a common hall.

According to the California Department of Finance, Beverly Hills had 16,110 housing units as of January 1, 2007 (Table 14). This represents a gain of 387 new homes since 1990. This modest rate of new housing growth over the past 16 years is reflective of the limited amount of residential land remaining in the community. Nearby urbanized communities of Santa Monica, Culver City, and West Hollywood also experienced limited new housing growth over the same period. In contrast, the City of Los Angeles and Los Angeles County experienced greater levels of new housing construction.

### Composition

Housing growth in Beverly Hills was largely constrained by the regional economic recession in the early 1990s and the limited remaining vacant residential land. However, through the recycling of underutilized commercial properties and land made available through mixed-use development, several new housing developments could be realized over the next few years.

Jurisdiction	1990	2000	2007	%Change 1990-2000	% Change 2000-2007
<b>Beverly Hills</b>	<b>15,723</b>	<b>15,855</b>	<b>16,110</b>	<b>0.8%</b>	<b>1.6%</b>
Santa Monica	47,753	47,863	49,409	0.2%	3.2%
Culver City	16,943	17,130	17,135	1.1%	0.03%
West Hollywood	23,821	24,110	24,450	1.2%	1.4%
Los Angeles City	1,299,963	1,337,668	1,386,169	2.9%	3.6%
Los Angeles County	3,163,343	3,270,909	3,382,356	3.4%	3.4%

SOURCE: 1990, 2000 Census and California Department of Finance January, 2007.

Approximately 36-percent of Beverly Hill's housing stock consists of single-family detached homes, and slightly over 1 percent is comprised of single-family attached units (Table 2). Multi-family dwellings account for 63-percent of homes in Beverly Hills, with the majority of these units consisting of complexes with five or more units. Due to the limited amount of new housing growth in the community since 1990, the proportion of single-family homes and multi-family housing has remained relatively stable.

Housing Type	1990		2000		2007	
	# Units	%	# Units	%	# Units	%
Single-Family Single-family Detached	5,611	35.7%	5,664	35.7%	5,747	35.7%
Single Family Attached	220	1.4%	236	1.5%	236	1.5%
<i>Total Attached and Detached</i>	<i>5,831</i>	<i>37.1%</i>	<i>5,900</i>	<i>37.2%</i>	<i>5,983</i>	<i>37.1%</i>
Multi-Family 2-4 Units	1,643	10.4%	1,802	11.4%	1,802	11.2%
Multi-Family 5+ Units	8,172	51.9%	8,125	51.2%	8,297	51.4%

Housing Type	1990		2000		2007	
	# Units	%	# Units	%	# Units	%
Total Multi-Family	9,815	62.4%	9,927	62.6%	10,099	62.7%
Mobile Homes, Traller & Other	77	0.5%	28	0.2%	28	0.2%
<b>Total</b>	<b>15,723</b>	<b>100%</b>	<b>15,855</b>	<b>100%</b>	<b>16,110</b>	<b>100%</b>

SOURCE: 1990, 2000 Census and California Department of Finance, January 2007.

There are no manufactured or mobile homes existing in Beverly Hills. The 1980 U.S. Census included five mobile homes, which have carried over into Department of Finance estimates, and the 2006 Department of Finance housing estimates indicate 28 mobile homes in the City, but City staff indicates these figures are in error.

### Tenure and Vacancy

The tenure distribution (owner-occupied versus renter-occupied) of a community's housing stock influences several aspects of the local housing market. Residential mobility is influenced by tenure, with ownership housing evidencing a much lower turnover rate than rental housing. Tenure is primarily related to household income, composition, and age of the householder, with housing cost burden being generally more prevalent among renters than among owners.

As indicated in Table 3, the majority of housing occupied in Beverly Hills is by renter households. Renter households are those occupying any type of housing, including apartments, condominiums, and single-family houses. Housing tenure did not change substantially between 1990 and 2000. Renter households increased slightly from 56-percent renter in 1990 to 57-percent in 2000. The tenure in Beverly Hills is similar to most other Westside cities in 2000. In the City of Los Angeles, 61-percent of households were renters, while 70-percent were renters in Santa Monica and 78-percent were renters in West Hollywood. The exception to this pattern among Westside cities is Culver City, where only 44-percent of households rent their home.

As shown on Figure H 4 (Owner-Occupied Housing Units) and Figure H 5 (Renter-Occupied Housing Units), the majority of owner occupied housing in the City is located north of North Santa Monica Boulevard. Homes in this area are almost exclusively large lot, single-family residential except for some local schools, a hotel and some neighborhood parks. In contrast, the area to the south contains higher-density single-family homes and multi-family uses. Consequently, the majority of the census tracts located south of

North Santa Monica Boulevard contains a significant amount of renter households.<sup>12</sup>

Tenure	1990		2000	
	Number	% of Total	Number	% of Total
Total Occupied	14,731	100%	15,035	100%
Owner Occupied	6,482	44%	6,518	43%
Renter Occupied	8,249	56%	8,517	57%
Rental Vacancy Rate	6.2		3.2	
Owner Vacancy Rate	2.7		1.6	
Overall Vacancy Rate	7.3		5.2	

SOURCE: 1990 and 2000 Census.

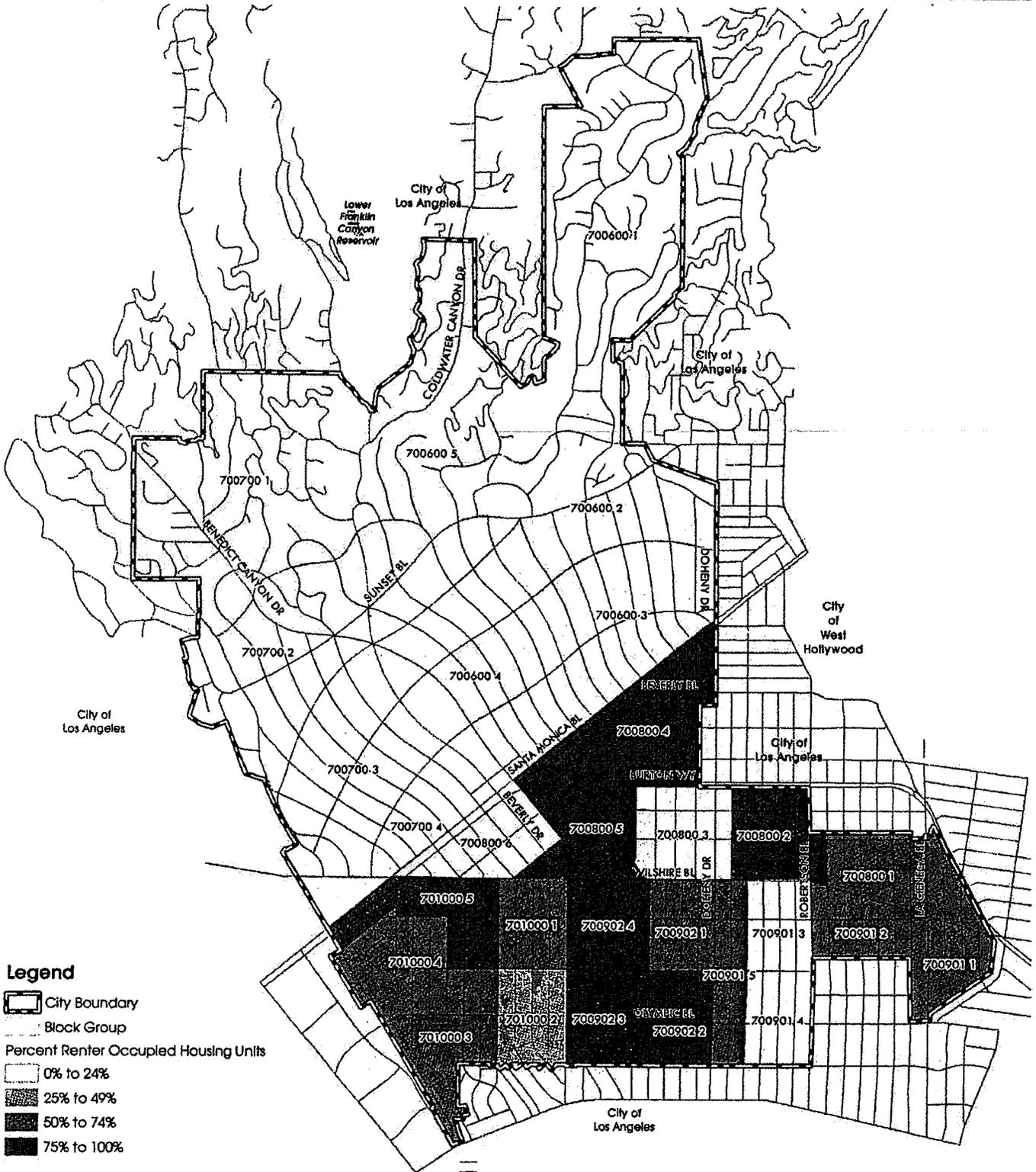
The housing market in Beverly Hills and throughout Los Angeles has become increasingly tight, as the vacancy rate continues to shrink. A vacancy rate is often a good indicator of how effectively for-sale and rental units are meeting the current demand for housing in a community. Vacancy rates of 5-percent to 6-percent for rental housing and 1-percent to 2-percent for ownership housing are generally considered optimum, where there is balance between the demand and supply for housing. A higher vacancy rate may indicate an excess supply of units and therefore price depreciation, while a low vacancy rate may indicate a shortage of units and resulting escalation of housing prices.

The housing vacancy rate in Beverly Hills has decreased noticeably since 1990. The 2000 city vacancy rates of 3-percent for rental housing and approximately 1-percent for ownership housing indicate a high demand for housing in the City. The low vacancy rates also mean that finding affordable and appropriate housing maybe difficult for many households in the community.

<sup>12</sup> It is important to note that while there are no residential uses in the western most portion of Block Group 700700 3 the map is showing a concentration in that area since the area is depicted by the entire Block Group.

# RENTER-OCCUPIED HOUSING UNITS

## Beverly Hills General Plan



Source: US Census Bureau, Census 2000 Summary File 1

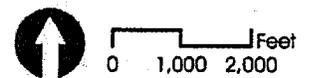
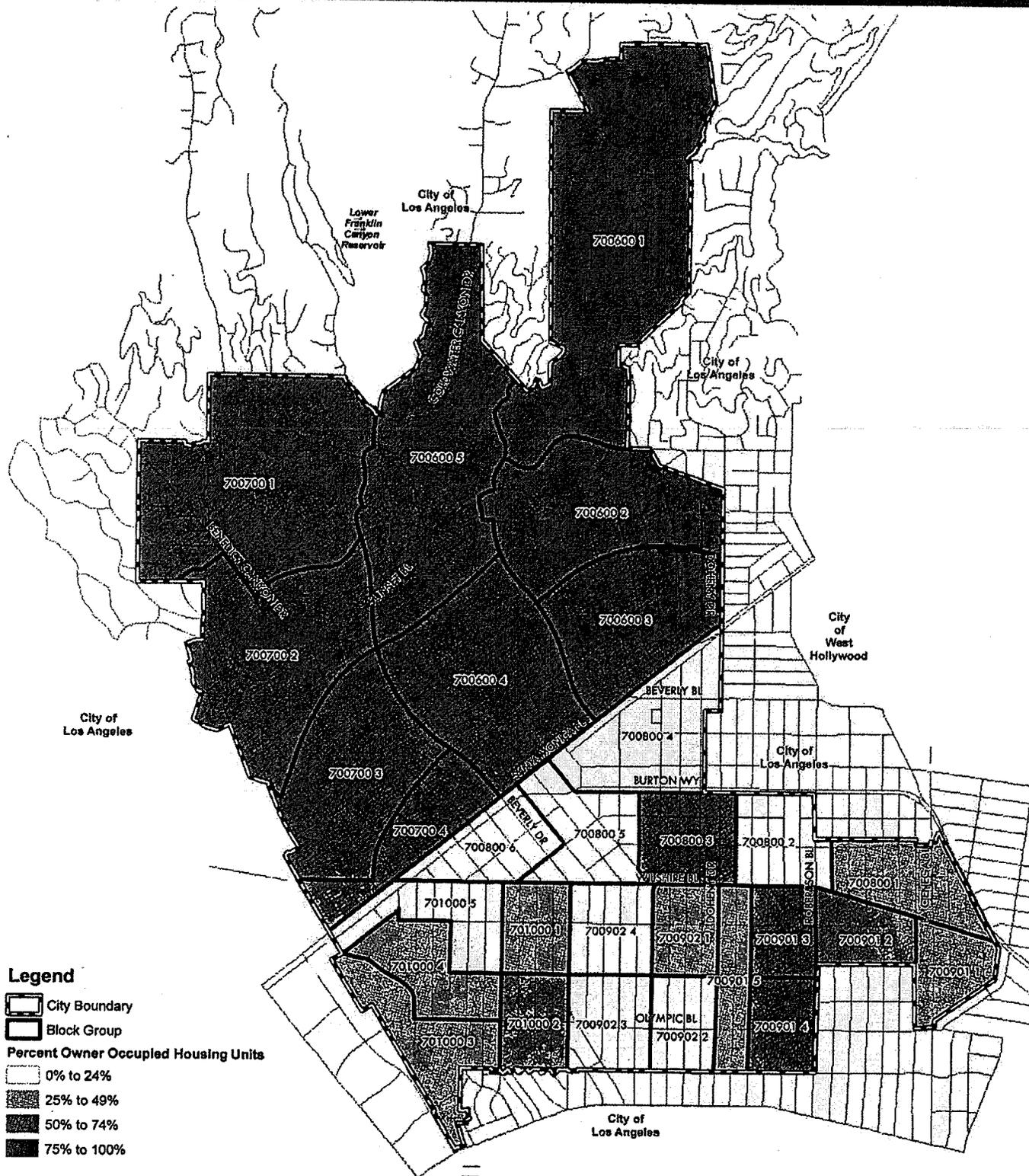


Figure H 4

# OWNER-OCCUPIED HOUSING UNITS

Beverly Hills General Plan



Source: US Census Bureau, Census 2000 Summary File 1

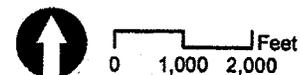


Figure H 5

## Age and Condition

The age and condition of the housing stock in a community is an important indicator of need. Housing units deteriorate over time, discouraging reinvestment, depressing neighborhood property values, and eventually impacting the quality of life in the community. Maintenance of existing housing units is especially important in Beverly Hills, given the older age of the community's housing stock.

Like several other Southern California communities, the City of Beverly Hills was created as a real estate development, with the original subdivision dating from 1907. There are a substantial number of single-family houses in the City that were constructed prior to 1920 (prior to the period in which the City became associated with the entertainment industry), a few dating from before 1910. The City experienced its greatest residential development and growth during the period from the late 1920s through the 1930s.

In general, housing over 30 years of age is usually in need for some major rehabilitation, such as a new roof, foundation work, plumbing, etc. As of 2000, nearly 35-percent of the City's housing stock was built before 1940 and approximately 47-percent of the City's units were constructed prior to 1950 (Table 17). The median year of construction was 1952. Approximately 44-percent of owner-occupied housing and 28-percent of renter-occupied housing was constructed prior to 1940.

<b>Year Structure Built</b>	<b>Number</b>	<b>Percent of Total</b>
2001–2006	255	1.6%
1990–2000	771	4.8%
1980–1989	1,188	7.4%
1970–1979	1,615	10.0%
1960–1969	2,356	14.7%
1940–1959	4,441	27.6%
1939 or earlier	5,484	34.0%
<b>Total</b>	<b>16,110</b>	<b>100%</b>

SOURCE: 2000 Census and California Department of Finance, January 2007

Deficient units are defined as deteriorated, dilapidated units, as well as those units inadequate in original construction, or which were under extensive repair. Some of the older, multi-family rental properties have need of minor and major rehabilitation, particularly

in the interior (such as plumbing, electrical, and aesthetics).<sup>13</sup> The Building and Safety Division estimates that units requiring substantial rehabilitation constitute approximately 3-percent of the City’s housing stock. The City currently has a reactive code enforcement program but is in the process of becoming more proactive and is developing a rental housing inspection program to address this issue. There are no structures in the community that require demolition.

**Assisted Housing at Risk of Conversion**

State law requires an analysis of existing assisted rental units that are at risk of conversion to market rate. This includes conversion through termination of a subsidy contract, mortgage prepayment, or expiring use restrictions. The following at-risk analysis covers the period of January 1, 2006, through June 30, 2016.

The City of Beverly Hills has one assisted senior housing project financed under the HUD Section 202 program. This project is the Beverly Hills Senior Housing that has 150 units for disabled and senior residents (Table 5). The project was developed in 1988 and has a 40 year affordability covenant. It is owned and operated by the Menorah Housing Foundation, a nonsectarian, nonprofit 501(c) (3) corporation that develops and manages affordable independent-living senior apartment units throughout Los Angeles. Residents must be 62 years of age or older and must earn 50-percent or less of the area median income. Discussion with the Menorah Housing Foundation indicates that there is a need for senior housing in community and there is currently a long wait list for the project. The Beverly Hills Senior Housing project is not at-risk of converting to market-rate housing during the current RHNA planning period.

Table 18 Assisted Housing Inventory					
Project Name	Tenant Type	Project Owner	Funding Source(s)	Units Subject to Conversion	Earliest Date of Conversion
Beverly Hills Senior Housing	Senior/disabled— Very low income	Menorah Housing	202/811	150	10/26/2028

SOURCE: Menorah Housing Foundation, 2007

**Section 8 Housing**

The Housing Authority of the County of Los Angeles administers the Section 8 Housing Choice Voucher Program for sixty-one jurisdictions throughout the county including the City of Beverly Hills. The Section 8 program provides rent subsidies to lower-income households (earning 80 percent or less than the county’s area

<sup>13</sup> Nestor Otazu. Code Enforcement Officer, City of Beverly Hills. 11/02/07

median income) in the form of vouchers. According to the County of Los Angeles 2003–2008 Consolidated Plan, a total of 19,563 households throughout the county of Los Angeles receive Section 8 assistance from the Housing Authority. Within Beverly Hills, three households receive Section 8 vouchers. Of these households, two are senior residents and one is a family household.

### Housing Costs and Affordability

Affordability is determined by comparing the cost of housing to the income of the local households. If the costs are high relative to the incomes, housing problems such as overcrowding and cost burden are more likely to occur. This section details the costs of housing in Beverly Hills and examines the overall affordability of housing within the City.

#### For Sale Housing

Table 19 summarizes all home and condominium sales during calendar year 2009 within the three Beverly Hills zip codes. The median price for single-family homes ranges from \$1,335,000 in Zip Code 90211 to \$2,775,000 in Zip Code 90210. Condominiums offer buyers a slightly lower-priced alternative to the single-family homes. Although fewer condominiums were sold in the City during 2009, the median price for condominiums ranged from \$680,000 in Zip Code 90211 to \$830,000 in Zip Code 90210.

**Table 19: Home Sales, 2009 – Single-Family and Condominiums**

Zip Code	Number of Sales	Median Price
<b>Single-family Homes</b>		
90210*	212	\$2,775,000
90211	36	\$1,335,000
90212	24	\$1,800,000
<b>Condominiums</b>		
90210	26	\$830,000
90211	24	\$680,000
90212	21	\$740,000

• SOURCE: DataQuick Information Systems (2009)

\* 90210 also includes hillside communities north of the Beverly Hills city limits.

Table 20 provides a more detailed breakdown of all homes and condominiums sold within the Beverly Hills City limits. 272 total single family homes were sold in 2009. As can be expected, sales prices generally increased with the size of the unit, with three bedroom units selling for a median of \$1,470,000, compared to \$4,260,000 for a

home with five or more bedrooms. The smaller homes tended to be older, built primarily in the 1930s, with the larger homes encompassing a broader mix of older and more recent construction.

Condominiums comprised one-quarter of all units sold during 2009. Sales prices ranged from \$350,000 to \$2.35 million, with an overall median price of \$845,000 for a 1,900 square foot unit built in 1987.

**Table 20 Single-Family and Condominium Home Sales in Beverly Hills, 2009**

Bedrooms	Units Sold	Price Range	Median Price	Avg. Unit Size (sq ft)	Av. Parcel Size (sq ft)	Av. Year Built
<b>Single-family Homes</b>						
2	18	\$615,000 - \$3,200,000	\$1,170,000	1,700	8,200	1936
3	48	\$765,000 - \$6,700,000	\$1,470,000	2,500	12,100	1939
4	50	\$1,080,000 - \$8,200,000	\$2,460,000	3,600	12,100	1946
5+	46	\$1,200,000 - \$10,000,000	\$4,260,000	5,900	20,300	1953
Total	162	\$615,000 - \$10,000,000	\$2,350,000	3,725	14,000	1945
<b>Condominiums</b>						
1	6	\$400,000 - \$699,000	\$560,000	1,050	–	1963
2	52	\$350,000 - \$1,400,000	\$760,000	1,700	–	1984
3	23	\$710,000 - \$2,300,000	\$1,470,000	2,400	–	2003
4	5	\$600,000 - \$2,350,000	\$1,050,000	3,100	–	1982
Total	86	\$350,000 - \$2,350,000	\$845,000	1,900	–	1987

SOURCE: Dataquick On-Line Real Estate Database. Compiled by Karen Warner Associates.

Table 21 presents the maximum affordable purchase price for moderate income households<sup>14</sup> and compares this with 2009 market sales prices for single-family homes and condominiums in Beverly Hills.

<sup>14</sup> Moderate income households are households which earn less than 110% of the Area Median Income or "AMI". AMI is calculated by the US Department of Housing and Urban Development (HUD) annually for every metropolitan area, and was \$62,100 in Los Angeles County for a family of four in 2009.

For example, a moderate income three person household can afford to pay up to \$222,000 to purchase a home, which is well below the median priced two-bedroom condominium (\$760,000) and two-bedroom single-family home (\$1,170,000) in Beverly Hills. Even the lowest priced, two-bedroom condominiums were in the mid \$300,000 range which is more than \$100,000 above the level of affordability to moderate income households.

**Table 21 Maximum Affordable Purchase Price, 2009 for Moderate Income Households**

	2 Bedroom (3 persons)	3 Bedroom (4 persons)	4 Bedroom (5 persons)
Household Income @ 110% Median	\$61,490	\$68,310	\$73,755
Income Towards Housing @ 35% Income	\$21,522	\$23,908	\$25,814
Maximum Monthly Housing Cost	\$1,794	\$1,992	\$2,151
<i>Less Expenses:</i>			
Utilities	(\$95)	(\$115)	(\$135)
Taxes (1.1% affordable hsg price)	(\$205)	(\$225)	(\$245)
Insurance	(\$100)	(\$115)	(\$130)
HOA Fees & Other	(\$180)	(\$180)	(\$180)
Monthly Income Available for Mortgage	\$1,214	\$1,357	\$1,461
Supportable Mortgage @ 6.0% Interest	\$202,000	\$226,000	\$244,000
Homebuyer Down payment (10%)	\$20,000	\$23,000	\$24,000
<b>Maximum Purchase Price for Moderate Income Households:</b>	<b>\$222,000</b>	<b>\$249,000</b>	<b>\$268,000</b>
Beverly Hills Median Single-Family Sales Price	\$1,170,000	\$1,500,000	\$2,460,000
Beverly Hills Median Condo Sales Price	\$760,000	\$1,470,000	\$1,050,000

SOURCE: Karen Warner Associates.

## Rental Housing

Current rental information as of March 2010, for Beverly Hills was obtained from internet rental listings on Craig's List and Westside Rentals websites. Table 22 summarizes the results of this survey by unit type, including apartments, second units, and room rentals within single-family homes.

A total of 58 apartment units were advertised for rent in Beverly Hills, with one-bedroom units comprising over 60 percent of the available stock. The median monthly rent was \$1,520 for a one-bedroom, \$2,375 for a two-bedroom, and \$3,100 for a three-bedroom unit. In comparison to the City's 2006 rent survey, apartment rents have remained relatively stable for one and two bedroom units, with 2006 median rents of \$1,600 and \$2,400 respectively. Rents on three bedroom units dropped by over 15

percent from the 2006 level of \$3,700, although the sample size was somewhat limited, with only four units advertised for rent.

A portion of advertised rentals also included second units. The monthly median rent for a second unit was \$1,100, with rents ranging from \$900 to \$1,695. However, as documented in the second unit survey, the majority of occupied second units in Beverly Hills are provided rent free and a significant percentage are occupied by family members or caregivers.

In addition to second units, there were also a number of individual rooms advertised for rent within single-family homes. Rooms with a private bath rented for a median of \$940 per month, with tenants also having access to the kitchen, common areas and outdoor space. At approximately \$150 per month less expensive than second units and \$600 less than a one-bedroom apartment, room rentals provide a relatively lower cost rental option for single individuals.

**Table 22 Survey of Vacant Rental Listings March 2010**

Unit Type/ Bedrooms	# Units Advertised	Rental Range	Median Rent
<b>Apartments</b>			
1	36	\$1,000 - \$3,000	\$1,520
2	18	\$1,500 - \$3,800	\$2,375
3	4	\$2,400 - \$4,800	\$3,100
<b>Second Units</b>			
1	6	\$900 - \$1,695	\$1,100
<b>Rooms for Rent in Single-Family Homes</b>			
1	6	\$850 - \$1,260	\$940

SOURCE: [www.craigslist.org](http://www.craigslist.org); [westsiderentals.com](http://westsiderentals.com).

Table 23, on the following page, compares apartment rents in Beverly Hills with the maximum affordable rent for very low, low and moderate income households based the standard of spending no greater than 30% of income on housing.

**Table 23 2010 Maximum Affordable Rents<sup>15</sup>**

Income Range Level	Max Affordable Rent After Utilities			
	Studio (1 person)	1 Bedroom (2 person)	2 Bedroom (3 person)	3 Bedroom (4 person)
Very Low Income (50% AMI)	\$510	\$789	\$643	\$704
Low Income (80% AMI)	\$841	\$956	\$1,068	\$1,177
Moderate Income (120% AMI)	\$1,282	\$1,460	\$1,635	\$1,807
Beverly Hills Median Apartment Rents		\$1,520	\$2,375	\$3,100

In aggregate, the median apartment rent exceeds the level of affordability to households earning low and moderate incomes. However, the rent survey documents a number of units with rents below the midpoint which fall within the affordability threshold to moderate income households. For example, of the 36 vacant one-bedroom units advertised, 15 units rented for less than \$1,400 and are thus considered affordable to households earning moderate incomes. As the unit size increases, however, so does the affordability gap, with no three-bedroom units renting at affordable levels.

### Rent Control

All apartment units in Beverly Hills are subject to rent control. Rent control of apartment units first went into effect March 31, 1979. The initial rent control ordinance rolled back rent to May 1978 levels and applied only to those apartments renting for \$600 or less as of May 31, 1978. Regulations governing just cause evictions and pass-through of capital improvements were adopted as well. Under this ordinance, rent levels may be annually increased by 8 percent or the average Consumer Price Index, whichever is less. Unit are no longer controlled once voluntarily vacated (or tenants are evicted for just cause) and may be rented at market levels. However upon the re-rental of the unit, those renting for \$600 or less continue to be subject to the ordinance.

In 1986, in response to complaints about exorbitant rent increases from tenants whose units were not rent controlled, a second rent control ordinance was enacted. This ordinance regulates rental of all apartment units not otherwise regulated by the first ordinance and limits annual rent increases to 10 percent.

<sup>15</sup> Income levels reflect the 2010 Official State Income Limits published by State HCD. Maximum affordable rent reflects deduction of LACDC utility allowance for Valley sub-region

\$52 - 1 bdrm, \$66 - 2 bdrm, \$83 - 3 bdrm (assumes water and trash included in rent).

Vacancy de-control or rent levels to market levels is also permitted, although units continue to be subject to the ordinance's provisions governing evictions as well as the maximum 10 annual rent increase.

The rent control ordinances do not require registration of apartments and consequently the number of units initially regulated by each ordinance is not known, nor is the extent of change in the numbers of the units governed by each of the ordinances.

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## **POTENTIAL CONSTRAINTS ON HOUSING PRODUCTION AND CONSERVATION**

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Several factors can constrain the production and conservation of housing. These factors include potential market-driven and governmental influences that could affect the City's ability to address its future housing needs and secure adequate and affordable housing for very low-, low-, and moderate-income households. This "Potential Constraints on Housing Production" section discusses these constraints and offers strategies the City can employ to mitigate the impacts of potential constraints on housing, where possible.

### **Non-governmental Constraints**

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State law defines nongovernmental constraints as "market factors which may hinder the development, improvement, and maintenance of housing." Nongovernmental constraints can have a negative effect on the availability and affordability of housing and supportive services, thereby potentially constraining the City's ability to achieve its housing objectives. This section describes typical nongovernmental constraints including economic factors, construction costs, land acquisition, and the availability of financing, all of which are primarily market-driven and generally outside the direct control of the City. However, through programs and policies, the City of Beverly Hills may be able to influence and offset the impacts of potential nongovernmental constraints.

### **Construction Costs**

Construction factors such as the type of construction, custom versus tract development, materials, site conditions, finishing details, amenities, square footage, and structural configuration can increase the cost of housing. In general, multi-family housing is less expensive to construct than single-family housing. However, construction costs vary significantly, depending on the size of the unit and the number and quality of amenities offered. This includes items such as fountains, swimming pools, underground parking, gyms, and other less obvious decisions based on the type of flooring, types of appliances, light fixtures, and quality of cabinetry and woodwork.

The average per-square-foot cost for good-quality housing in nearby communities is approximately \$200 for multi-family housing and \$200 to \$250 for single-family homes, including labor. Estimates

are based on “good quality” construction, providing for materials and fixtures well above the minimum required by state and local building codes.<sup>16</sup>

Though construction costs comprise a large portion of the total development cost of a project, these costs are fairly consistent throughout the county and therefore would not constitute an actual constraint on housing production in Beverly Hills.

### **The Cost and Availability of Land**

Land costs include the cost of raw land, site improvements, and all costs associated with obtaining government approvals. Land costs typically account for a large share of the total housing production costs. All other things being equal, very high land costs may make housing development infeasible unless expected rents or sales prices are high enough to recuperate the additional land costs. In Beverly Hills one of the primary market constraints to producing affordable housing is land cost. This is directly attributable to the City’s desirable location and limited availability of vacant and developable land for residential development. According to recent data, the price for single-family residential land approximately ranges from \$4 million to \$18 million an acre. No multi-family residential vacant land was listed for sale in the City of Beverly Hills during the survey period (May 2007).<sup>17</sup>

### **The Cost and Availability of Financing**

Historically, communities have experienced a pattern where households seeking to finance the purchase of a home have had more difficulty in lower-income neighborhoods. The Community Reinvestment Act was passed in 1977 in an effort to address this issue. In tandem with the Home Mortgage Disclosure Act (HMDA), lending institutions are required to make annual public disclosures of their home mortgage lending activity. This applies to all loan applications for home purchases, improvements, and refinancing, whether financed at market rate or with government assistance. The most current HMDA available data for Beverly Hills is for 2005.

As shown in Table 24 (Disposition of Home Purchase Loans and Home Improvement Loans in Beverly Hills by Census Tract, 2005), mortgage financing and improvement financing is generally

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<sup>16</sup> Reed Construction Data. Los Angeles Times. July 15, 2007.

<sup>17</sup> Sources: [www.loopnet.com](http://www.loopnet.com), [www.trulia.com](http://www.trulia.com), and [www.prudentialproperties.com](http://www.prudentialproperties.com) (accessed May 2, 2007)

available to homebuyers in Beverly Hills and is not considered a constraint. The annual HMDA report for 2005 indicates that 752 conventional home purchase loan applications and 104 home improvement applications were submitted for homes in Beverly Hills. Approximately 61 percent of home purchase loans and 57 percent of home improvement loans were approved by the lenders and accepted by the applicants.

Tract	Home Purchase Loans				Home Improvement Loans			
	Total	Percent			Total	Percent		
		Orig	Denied	Other		Orig	Denied	Other
7006.00	127	59.8%	14.2%	25.9%	31	51.6%	41.9%	6.5%
7007.00	79	64.6%	17.7%	17.7%	5	80.0%	20.0%	0%
7008.00	284	58.9%	20.4%	20.7%	28	50.0%	17.9%	32.1%
7009.01	104	64.4%	18.2%	17.3%	17	64.7%	11.8%	23.5%
7009.02	91	58.2%	19.8%	21.9%	10	60.0%	20.0%	20.0%
7010.00	67	64.2%	25.4%	10.4%	13	84.6%	15.4%	0%
<b>City Total</b>	<b>752</b>	<b>60.8%</b>	<b>19.1%</b>	<b>20.1%</b>	<b>104</b>	<b>57.1%</b>	<b>21.0%</b>	<b>22.1%</b>

SOURCE: Federal Institutions Examination Council (FFIEC) 2005 (accessed 06/25/07)  
*Orig = Originations; loans approved by the lending institutions and purchased by the applicants*

### **Governmental Constraints**

Local government can affect the production of housing in a variety of ways through its police powers as generally expressed in its land use and development regulations. Some commonly used practices include limiting the land designated for residential development and/or the densities at which that development can occur, imposing fees or exactions, and requiring review periods prior to approval of a project. Local land use regulations can also help to define residential character and facilitate housing production.

It is important to recognize that the goal of producing housing may at times conflict with other City goals, such as the desire to provide open space and recreation facilities, the desire to protect environmental features and historic resources, and the desire to ensure the health and safety of residents by maintaining the current level of community services and infrastructure. This section evaluates the extent to which government regulation in Beverly Hills acts as a constraint to the production, maintenance, or improvement of housing for all income groups, and whether such constraints would prevent the City from achieving its assigned share of the regional housing need.

### **Land Use Controls and Zoning Standards**

The Beverly Hills General Plan establishes maximum residential densities throughout the community based upon the availability of public services, circulation capacities, and the desire to maintain the character of existing neighborhoods. The City has three single-family land use districts, ranging in density from one to six units per acre, and five multi-family districts, accommodating densities from 22 up to 50 units per acre. As indicated in Table 25 (General Plan Land Use Categories for Residential Areas), the General Plan also designates three areas for Planned Development, providing greater flexibility by regulating development density/intensity through floor area ratios (FAR) rather than units per acre. Specific Plans have been adopted for each of the three Planned Developments.

Table 26 General Plan Land Use Categories for Residential Areas			
Category		Uses	Density/ Intensity
<b>Residential Land Use Designations (General Plan)</b>			
Single Family	Low	Single-family detached dwelling units on a single legal lot; with second units in accordance with state law.	1 du/ac
	Medium	Single family detached dwelling units on a single legal lot; with second units in accordance with state law.	4 du/ac
	High	Single family detached dwelling units on a single legal lot; with second units in accordance with state law.	6 du/ac
Multi family	Very Low	Multi-family residential development containing attached or detached residential units.	22 du/ac
	Low	Multi-family residential development containing attached or detached residential units.	40 du/ac
	Low-Medium	Multi-family residential development containing attached or detached residential units.	40 du/ac
	Medium	Multi-family residential development containing attached or detached residential units.	45 du/ac
	High	Multi-family residential development containing attached or detached residential units.	50 du/ac
<b>Planned Development</b>			
	Robinsons-May	Residential, with supporting retail and services	31 du/ac : 2.6 FAR
	Hilton	Hotel, with residences, retail and supporting restaurant and commercial	2.5 FAR
	Beverly Hills Garden/Montage	Hotel, with residential, retail and supporting restaurant and commercial, and public plaza	

a. Incentives specified in Table LU 1 for additional development density and height exceeding existing baseline standards, as indicated by an asterisk (\*), shall not be applied "by right" and considered only in very limited and special circumstances for the specific purpose of accommodating "key industries" that provide substantial community benefit, including, but not limited to: (a) support and enhance Beverly Hills key business sectors (such as entertainment Class-A offices, high-end retail, hotel, technology, and comparable uses); (b) provide high-paying employment opportunities; (c) contribute significant revenue for City services; (d) exhibit a high level of architectural design excellence; and (e) are scaled and massed to complement and "fit" with adjoining residential neighborhoods. Criteria shall be established in the Municipal Code for the types of uses that qualify and the process to be used in considering additional density and height, which, at a minimum, shall require public comments regarding their appropriateness. Developer obligations and community benefits shall be confirmed by a Development Agreement with the City.

Zoning is an implementation tool that establishes districts to control the physical development of land consistent with the General Plan. Zoning regulations identify land uses and activities that are permitted, prohibited, or are permitted only with a conditional use permit or other discretionary permit within the zoning designations. In addition to permitted uses, zoning establishes development standards relating to intensity, lot coverage, setbacks, and height requirements. As shown in Table 26 (Zoning Designations), Beverly Hills has seven single-family and five multi-family residential zoning designations, with 86 percent of all land devoted to residential uses.

<b>Table 25 Zoning Designations</b>			
<b>Zoning</b>	<b>Parcels</b>	<b>Acres</b>	<b>Percent of City's Land Area</b>
<b>Single-Family Residential</b>			<b>76.84</b>
R-1	1373	492.7	17.64
R-1.5X	451	76.3	2.73
R-1.5X2	359	49.0	1.76
R-1.6X	451	62.6	2.24
R-1.7X	162	21.5	0.77
R-1.8X	426	70.8	2.54
R-1.X	2,968	1,372.8	49.16
<b>Multiple Family Residential</b>			<b>9.20</b>
R-3	6	1.0	0.04
R-4	1,410	222.9	7.98
R-4-P	10	1.0	0.04
R-4X1	116	18.0	0.65
R-4X2	79	14.0	0.50
<b>Commercial</b>			<b>8.37</b>
<b>Other (Parks, Public Facilities, etc...)</b>			<b>5.59</b>
<b>Total</b>		<b>2,792.2</b>	<b>100%</b>

SOURCE: General Plan Technical Background Report, October, 2005

The City's zoning regulations establish standards for residential development including minimum lot sizes, density (based on amount of site area) unit size, height, setback and parking standards, as well as additional standards related to hillside areas. The City's residential development standards are presented in the following tables:

- Table 27 (City of Beverly Hills Residential Zoning Requirements—Single Family)
- Table 28 (City of Beverly Hills Residential Zoning Requirements—Multiple Family)
- Table 29 (Site Area Standards).

In general, rehabilitation or reconstruction of older units does not require conformance with current zoning standards unless over 50 percent of the value of the structure is involved. In order to address the potential loss of units on properties developed with more units than currently permitted under zoning, the Housing Element establishes a program (Imp. 12.2) for the City to consider allowing the same number of units to be rebuilt as currently exist.

***Single-Family Development Standards***

The City has development standards that apply to all single-family housing in the community and those that are unique to three different single family areas of the City:

- Hillside Area and Trousdale: (north of Sunset Boulevard)
- Central Area of the City, north of Santa Monica (north of Blvd., below Sunset Boulevard)
- Central Area of the City, south of Santa Monica (all areas south of North Santa Monica Boulevard)

Single-family dwellings must be a minimum of 1,600 square feet in size. There is no maximum size per se for single-family dwellings. Maximum size is a function of the lot size, setback, height limit, size of buildable pad, etc. Projects in excess of 1,500 square feet plus 40 percent of lot size (or over 15,000 square feet plus in the Hillside Area) must be first reviewed by the Planning Commission, which has the authority to establish a maximum size. The maximum floor area is further regulated in the Hillside Area by the topography and buildable area.

The maximum allowable height for single-family homes varies from 14 to 32 feet depending on the location, slope, roof style and other conditions. These standards are further identified in Table H 27.

Table 27 City of Beverly Hills Residential Zoning Requirements—Single Family				
	Central, North of Santa Monica	Central, South of Santa Monica	Hillside	Trousdale
Minimum Site Area (sf)	1,600 sf	1,600 sf	1,600 sf	1,600 sf
Density Range (units/acre)	3.4 du/acre	5.8 du/acre	1.0 du/acre	
Minimum lot Size	13,000 sf	7,500 sf	43,560 sf	None; FAR limited to 1,500 sf plus 40% of site area
Minimum Front Yard Setback	As established in the records for each property <sup>a</sup>		As established in the records for each property <sup>a</sup>	15 ft
Minimum Side Yard Setback	Min. 7 to 6 ft on each side; for lots wider than 70 ft the sum is 15 ft plus 30% of lot wide in excess of 70 ft	5 feet on each side; one side shall be 9 ft for first 38 ft behind front setback line <i>South of Olympic Blvd. west of Roxbury Dr.:</i> 5 ft on each side; sum min. 20% of lot width <i>South of Olympic Blvd. east of Doheny Dr.:</i> 5 feet on each side	10 ft or 12% of the lot width for each setback	5 ft Exception: For buildings on sites consisting of two or more lots as subdivided on July 3, 1984, side setback shall be 20 ft If width of a site area exceeds one hundred 100 ft, then the side setback shall be increased by 10% of the width in excess of 100 ft.
Minimum Rear Yard Setback	30% of lot depth minus 9 ft <sup>b</sup>		15% of the lot depth or 20 ft, whichever is greater	10 ft
Height Limit (dwellings)	28 ft	Sloped roof: 30 ft Flat roof: 25 ft	26 ft <sup>c</sup>	14 ft
Lot width and depth	Maximum width and depth shall not exceed the average depth of the lots in the same block			—

SOURCE: City of Beverly Hills May 2007.

- a. If no record, the distance between the front lot line and the closest element of the existing primary residence; or the average of the front setbacks of the other site areas on the same side of the street in the same block.
- b. Doheny Drive and Olympic Boulevard; Lots located easterly of Doheny Drive and southerly of Olympic Boulevard; a maximum of four hundred fifty (450) sf of floor area of the principal residential building may encroach into the rear yard provided that a 10' rear setback is provided.
- c. A structure may exceed this height if the structure is constructed within a height envelope that begins at 22' in height at the front setback line and increases toward the rear of the site at a 33° slope to a maximum height of 30'.

### ***Multi-Family Development Standards***

The number of dwelling units that may be constructed on any individual multi-family residential property is determined by applying a combination of standards to the specific site, summarized in Tables 28, and 29. The development standards for condominiums and rental apartments are the same. The City's multi-family development standards permitted densities ranging from 26 units per acre to 48 units per acre.

Minimum front and rear yard setbacks are generally 15 feet although there are site-specific exceptions. Minimum side yard setbacks are calculated at a rate of 5 feet for a one-story structure with increments of two additional feet for each additional story or 12 feet in height of the structure. No structure may exceed 175 feet in length. A minimum of 200 square feet plus of living area is required for each unit.

### ***Dwelling Unit Size***

The City of Beverly Hills Zoning Code currently requires the following minimum individual dwelling unit sizes:

- 0 Bedroom: 600 square feet
- 1 Bedroom: 1,000 square feet
- 2 Bedrooms: 1,300 square feet
- 3 or more Bedrooms: 1,500 square feet

These minimum unit sizes can act to limit the achievable densities to less than that otherwise permitted under zoning. As a means of better facilitating the provision of smaller, and more affordable units, the City has included a program in the Housing Element (Imp 12.2) to decrease the minimum unit size and potentially replace the current density calculation with a maximum floor area ratio. The City already provides for reduced dwelling unit sizes for senior and disabled housing.

Table 28 City of Beverly Hills Residential Zoning Requirements—Multiple Family					
	R-3 <sup>b</sup>	R-4 <sup>b</sup>	R-4X-1 <sup>c</sup>	R4X-2 <sup>c</sup>	R-4P4
Minimum Front Setback <sup>a</sup>	As established in the records for each site area. If not shown, than 15 feet. <sup>b</sup>				
Minimum Side Yard Setback	<p>Three stories or less or 33 feet or less: sum of side setback from the two longest side lot lines must be at least 17 feet In addition, each side setback shall be at least 8 feet</p> <p>Four stories or 33 feet to 45 feet: sum of side setback from the two longest side lot lines must be at least 19 feet. In addition, each side setback shall be at least 8 feet</p> <p>More than four stories or greater than 45 feet: sum of side setback from the two longest side lot lines must be at least 23 feet In addition, each side setback shall be at least 9 feet</p>				
Modulation Requirement <sup>c,d</sup>	<p>Three stories or less: the area of modulation shall be 3 percent of the aggregate principal building or 1,500 sf</p> <p>Four stories: the area of modulation shall be 3.5 percent of the aggregate principal building or 1,500 sf</p> <p>Five stories: the area of modulation shall be 4 percent of the aggregate principal building or 1,500 sf</p>	<p>For lots that do not exceed 50 feet In width: The front façade shall be modulated so that a portion of the building are set back at least 5 feet from the front setback line.</p> <p>For lots that exceed 50 feet in width: The front façade shall be modulated so that a portion of the building are set back at least 10 feet from the front setback line.</p>			
Minimum Rear Yard Setback	15 feet from the rear lot line or 22½ feet from the centerline of the abutting alley, whichever is greater				
Height Limit (dwellings)	<p>No building or structure located on a site that is less than or equal to sixty feet (60') in width shall exceed 3 stories or 33 in height.</p> <p>In addition, no building or structure shall exceed the relevant height limitation imposed by Height districts (refer to Table 30)</p>				
Minimum Unit Size	<p>0 Bedroom: 600 sf</p> <p>1 Bedroom: 1,000 sf</p> <p>2 Bedrooms: 1,300 sf</p> <p>3 or more Bedrooms: 1,500 sf</p> <p><i>Note: These standards are reduced for senior and disabled housing.</i></p>				
Structure Width	Maximum of 175 feet				
Outdoor Living Area	Minimum of 200 sf of outdoor living each for each unit				

a. Large scale multi-family developments (width of 100 feet or more) shall have a minimum of 60% and maximum of 70% of the front façade of the first two stories built back to the front setback line.

b. Exceptions are properties previously zoned R1.5: Not withstanding any other provision, the front sent back is 15 feet.

c. A reduction of the modulation requirement may be permitted if the development does not adversely impact on the scale and massing of the streetscape.

d. Large scale multi-family developments (width of 100 feet or more) must provide an additional area of front modulation based on the following formula: Area of Modulation= Width of the principle buildable area x 5 feet x the number of stories.

Maximum Zoning Unit Density / Site Area Standards

Each area zoned for multi-family residential use is subject to one of three possible minimum site area requirements for each dwelling unit, depending on the number of contiguous lots comprising the site, the proximity of the block to single-family zoned areas, and the street width (referred to as “conditions”). The City’s standards provide increased densities for parcel assembly, thereby reducing the number of driveway curb cuts, decreasing the cost of parking by increasing the number of parking spaces possible on each subterranean level and decreasing the percentage of garage area devoted to ramps and aisles. The standards are listed in Table H 29 (Site Area Standards).

Table 29		Site Area Standards <sup>18</sup>	
Condition (this is not height district)	Number of Lots on Site (assuming a lot width along the street of up to 60-feet)	Minimum Site Area per Unit	Resulting Density (units/acre)
A	1	1,700 sf	26
	2	1,450 sf	30
	3	1,200 sf.	36
B	1	1,500 sf	29
	2	1,200 sf.	36
	3	1,000 sf	44
C	1	1,300 sf.	34
	2	1,100 sf	40
	3	900 sf	48

The City’s Zoning Code further refines the unit densities allowable in the General Plan. The intention of this refinement is to provide decreased densities near single-family residences and on smaller width streets. Conditions A, B, and C, as included in the chart above are used to refine the allowable General Plan density. These conditions are defined as follows:

Condition A: All multiple-family properties within 170 feet of a single-family property.

Condition B: All multiple-family properties on streets less than 34-feet wide.

Condition C: All other multiple-family properties which do not meet the previous two criteria.

<sup>18</sup> An exception of these site area requirements is a small R-3 zoned area on North Doheny Drive where a minimum of 1,700 square feet of site area is required for each additional unit.

Zoning Unit Density – Bonus Unit

In order to encourage the provision of smaller, more affordable units, the City's development standards allow one additional efficiency unit (no bedroom) per project above the maximum densities defined in Table 29 above. This "efficiency bonus" has not been utilized since its adoption during the prior Housing Element cycle due in large part to the lack of apartment development during the period. The Housing Element includes a program (Imp. 10.5) to promote the availability of the efficiency unit bonus.

*Height Limits*

No building or structure located on a site that is less than or equal to 60 feet in width may be more than three stories or 33 feet in height.

In addition, there are maximum heights for multi-family development depending on the designated Height District. Maximum heights are the lesser of the indicated number of stories or height in feet:

**Table 30 Building Height Districts with Maximum Buildings Height (to Ceiling Plate)<sup>^</sup>**

District A: Three stories, and 33 feet

District B: Four stories, and 45 feet

District C: Five stories, and 55 feet

<sup>^</sup> All properties with less than 60' feet of width along the street are limited to three stories and 33 feet in height regardless of district.

The Building Height Districts are located in the City's Zoning Code and modify the maximum height allowances given in the City's General Plan. District A, which allows three stories and 33 feet in height, is located adjacent to single family residential properties and is intended as a graduated buffer between the maximum height allowed in the single family districts (two stories and 30 feet for a pitched roof, 25 feet for a flat roof) and the heights in District B and District C. District B is an intermediary buffer, providing greater height than is allowed in District A, but not as much height as allowed in District C. The City's multiple-family height districts are not related to the City's zoning unit density conditions. Unit density is calculated by the City zoning unit density conditions (10-3-2801). The height districts are defined in the City's Zoning Code (10-3-2804) and identified on the City's Multi-Family Height District Map.

A program has been included (Imp 12.2) that would consider modifying the height district standards to allow projects on properties with narrower lot widths along the street to be constructed to the heights and number of stories allowable in the height district.

### *Deviations from Multi-Family Development Standards*

The City has established an "R-4 Permit" to accommodate projects that deviate from the basic development standards within specified criteria. The R-4 permit allows for modifications to building height, length, setbacks and articulation, depth of garages that encroach into the front yard setback, and permitted paving in the front yard.

The R-4 permit also allows for "bonus units" to be developed above existing carports or garages where the rear property line abuts an alley. One-bedroom units ranging between 400 to 999 square feet in size are permitted, with heights of up to 28 feet, or the height of the principal building. Housing Element Program 10.5 will advertise the City's zoning provisions for developing bonus units above free-standing garages.

### **Cumulative Impact of Development Standards**

As a means of assessing the cumulative impact of the City's development standards on achievable densities, the City reviewed multi-family projects built in the R-4 zone over the past several years. Table 32 below summarizes the characteristics of five multi-family projects, and compares the maximum densities permitted under the General Plan, and zoning code, with the actual built project.

**Table 31 Comparison of Actual R-4 Units Built to the Allowable Densities in the General Plan, and Zoning Code (2008-09 Projects)**

Date	Project APN(s)	Number of Lots	Parcel Size (Acres)	Max. Units (Gen. Plan)	Max Unit <sup>^</sup> (Zoning)	Number of Units Built as % of:				
						Units Built	Built Density	Gen. Plan Density	Zoning Code Density	Units Demo'd
<b>Multi-Family Residential – High Density (50 Units/Acre)</b>										
2008	4333028006 4333028005 4333028004	3	0.39	19	18	4	17	44 du/acre	90%	100%
2008	4334021089	1 <sup>19</sup>	0.30	15	13	2	13	43 du/acre	87%	100%
2009	4342036009 4342036008 4342036007	3	0.48	24	24	16	20	42 du/acre	83%	87%
2009	4328026021	1	0.18	9	6	8	7	39 du/acre	78%	100%
<b>Multi-Family Residential – Medium Density (45 Units/Acre)</b>										
2008	4331003063	4	0.55	25	25	8	23	42 du/acre	93%	89%

<sup>^</sup> Maximum Units allowable on the site takes into account height district limits, zoning unit density calculation, required setbacks, and building modulation requirements.

Table 31 illustrates that multi-family buildings constructed in 2008 and 2009 typically were built to at least 85-percent of the maximum zoning code density. In addition, the table above illustrates how the City's zoning density incentive for assemblage of properties incentivizes greater unit density. The five R-4 projects presented also illustrate the feasibility of developing on small parcels (< .5 acres).

### Parking Requirements

The number of parking spaces required per dwelling unit is dependent upon the type of residential use, number of bedrooms, and for single-family dwellings, location in the community. Table 32 (Residential Parking Requirements) presents the required parking spaces necessary for residential development.

<sup>19</sup> This was a single parcel development that consisted of two legal lots.

<b>Table Residential Parking Requirements</b>		
<b>Use Type</b>	<b>Required Parking Spaces</b>	<b>Covered Spaces</b>
<b>Single-Family Central Area</b>		
No more than 4 Bedrooms	2	None
5 Bedrooms	3	
6 or more Bedrooms	4	
<b>Single-Family Hillside Area</b>		
<6,000 sqe	4	2
>6,000 sqe	3	2
<b>Single-Family Trousdale Estates</b>		
No more than 4 Bedrooms	2	None
5 Bedrooms	3	
6 or more Bedrooms	4	
<b>Multiple-Family<sup>a,b</sup></b>		
Efficiency Unit (<1,000 sf)	1	None
1 Bedroom	2	
2 Bedrooms	2.5	
3 Bedrooms	3	
4 Bedrooms	3	
5 or more Bedrooms	4	
Congregate Housing for Elderly and Disabled	Studio or 1 bdrm – 1 space 2 bdrm – 1½ space (May be reduced to 1/2 a space per unit)	
Multi-family Housing for Elderly and Disabled (Affordable)	1 space per unit (May be reduced to 4/10 <sup>th</sup> of a space per unit)	

SOURCE: City of Beverly Hills, Municipal Code, December 2006.

a One guest space for each four units.

b Up to 20% of parking spaces may be tandem. The Planning Commission may increase the percentage of tandem parking spaces as part of an application for an R-4 permit.

The City requires multi-family housing to provide structured parking and to screen all parking spaces from view of public streets. These requirements have resulted in most multi-family projects providing subterranean parking. In order to reduce development costs by providing alternatives to subterranean parking, the Housing Element includes a program (Imp 12.2) for the City to evaluate revisions to its standards to allow greater flexibility in the type and location of multi-family parking.

## **Provisions for a Variety of Housing**

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Housing Element law specifies that jurisdictions must identify adequate sites to be made available through appropriate zoning and development standards to encourage the development of a variety of housing types for all economic segments of the population. This includes single-family homes, multi-family homes, mobile homes, second units, emergency shelters, and transitional housing among others. The Beverly Hills Zoning Code designates permitted (P), use permit (UP), regulatory permit (RP) or conditional uses (CUP) for all developable use types in the City in relation to the City's zoning designations. Table 33 (City of Beverly Hills Residential Allowable Residential Development Land Use Regulations) summarizes housing types permitted within the City's zoning districts.

Residential uses are not permitted in commercial zones pursuant to the current zoning code, although the City assesses the potential for mixed residential/ commercial uses in commercial areas on a case by case basis and has approved four projects since 2006 (9900 Wilshire, 9876 Wilshire, 9200 Wilshire, and 8600 Wilshire). Mixed use projects involving the construction of a new building require General Plan amendments and Zone Changes for approval. The conversion (adaptive reuse) of an existing office building on Wilshire Boulevard (Commercial Zone) to residential use with ground floor retail use was approved without a General Plan amendment (8601 Wilshire).

The City has a multi-family residential-commercial parking (RMCP) zone to provide a transition between residential and commercial zone districts. The RMPC zone allows for R-4 residential, commercial and parking uses, and is currently applied to a six acre area located on North Crescent Drive between Wilshire Boulevard and north of Brighton Way. The area is developed with the City's affordable senior project, and a mix of local serving commercial uses, offices, assisted living elderly units, a newly developed market rate apartment development, and public parking.

**Table 33 City of Beverly Hills Residential Allowable Residential Development Land Use Regulations**

	Single-Family								Multiple-Family					
	R-1	R-1X	R-1.5	R-1.5X	R-1.5X2	R-1.6X	R1-7X	R-1-8X	R-3	R-4	R-4X-1	R4X-2	R-4P4	RMCP*
Single-Family Dwelling	P	P	P	P	P	P	P	P	P	P				P
Duplex									P	P	P	P	P	P
Multi-Family									P	P	P	P	P	P
Second Units	P	P	P	P	P	P	P	P						
Congregate Housing for Elderly and Disabled**									CUP**	CUP**	CUP**	CUP**	CUP**	CUP**
Multi-Family Residences for Elderly and Handicapped^									CUP^	CUP^	CUP^	CUP^	CUP^	CUP^
Manufactured/Mobile Homes	P	P	P	P	P	P	P	P						
Community Care Facilities	Not currently specified in Zoning – addressed in Housing Element program 12.1													
Transitional and Supportive Housing														
Emergency Shelters														
Single Room Occupancy (SRO)														
Small-Family Day Care	P	P	P	P	P	P	P	P						
Large-Family Day Care Home	UP	UP	RP	RP	RP	UP	UP	UP						

SOURCE: City of Beverly Hills, Municipal Code 2010

P Permitted Use                      UP Use Permit  
RP Regulatory Permit                CUP Conditional Use Permit

- \* RMCP: Residential Multi-Family-Commercial Parking zone. Allows residential uses and commercial uses. Allows mixed uses in buildings with a conditional use permit (CUP).
- \*\* Conditional Use Permit (CUP) required to utilize the reduced development standards offered in this overlay zone. Intended to reduce development costs for assisted living facilities. Specific requirements apply. The project site must be located in an area with four- or five-story height limits; located adjacent to commercially zoned areas; separated from adjacent commercial areas by an alley; and located on a street greater than thirty feet (30') in width. Unit density up to 165 units/ acre. Reduced minimum unit sizes and parking requirements apply (450 square feet minimum unit size, unit must have private bathroom). (BHMC 10-3-12.8). A map indicating the approximate Congregate housing overlay is included at the end of the document.
- ^ Conditional Use Permit (CUP) required to utilize the reduced development standards offered in this overlay zone. Intended to reduce development costs of housing for seniors and persons with disabilities. Specific requirements apply. Housing limited to households with head of household 62 years and older and families with handicapped member. Maximum unit density 150 units/ acre. Minimum unit size as defined by HUD. Maximum number of bedrooms per unit is 2. Only 5% of units can be 2-bedroom units (BHMC 10-3-12.5).

## Second Units

The City's Zoning Code defines second units as an attached or detached residential dwelling unit that provides complete, independent living facilities for one or more persons including permanent provisions for living, sleeping, eating, cooking, and sanitation, and is located on the same site area as the primary dwelling. In compliance with AB 1866, Beverly Hills has developed both a ministerial approval process for second units that are less than 650 square feet in size on minimum 6,000 square foot R-1 parcels, and a discretionary review process for larger second units proposed on R-1 properties located north of Santa Monica Boulevard. Each second unit can be provided with one parking space in addition to the parking spaces required for the primary dwelling, which additional parking space can be provided behind the front setback line of the site area.

The City has received and approved an average of 3 discretionary applications annually since the current ordinance was adopted in 2003, and is in the process of identifying building permits for second units less than 650 feet in size not required to undergo discretionary review. In order to collect information on second units to determine who lives in them, rent ranges, size, and additional steps the City can take to encourage construction of second units, the City recently completed (July, 2010) a Citywide survey of residential property owners (refer to Residential Sites section for further discussion of the survey results). One of the questions posed in the survey is the amount of rent charged on existing second units (if any), as a means of assessing affordability and contribution towards addressing the community's regional housing needs (RHNA). Of the 40 occupied second units in the survey, 81 percent were provided rent free or for a rental amount affordable to very low income households. The results of the survey indicate that the majority of second units in Beverly Hills are occupied by caregivers or elderly parents of the primary homeowner.

To further encourage the provision of second units, the Housing Element includes a program (Imp 10.4) to evaluate modifications to its second unit ordinance, including:

- Consider greater flexibility in second unit standards in R-1 zones south of Santa Monica Boulevard.
- Consider allowing larger sized second units, of up to 1,000 square feet by right, to eliminate the need for a second unit permit, thereby reducing processing times and development costs.

- For second units built above a garage, consider allowing an increase in the permitted height up to the height of the primary residence.
- Consider allowing reduced setback requirements where privacy is not compromised

### **Senior and Disabled Housing**

Beverly Hills has established modified standards to specifically encourage the provision of higher density rental housing for seniors and persons with disabilities at costs lower than could otherwise be achieved. While housing which serves seniors and the disabled is permitted in any residential zone district subject to the same standards as other residential uses, for such housing to take advantage of a potential doubling in density and other modified standards, a conditional use permit is required. The City's Municipal Code specifies the following two distinct types of senior and disabled housing: 1) Multiple-Family Congregate Housing for Elderly and Disabled Persons (Article 12.8); and 2) Multiple-Family Residences for Elderly and Handicapped Persons (Article 12.5). The definition and zoning incentives for each are described in the following section.

### **Multiple-Family Congregate Housing for Elderly and Disabled Persons, Emergency Shelters, Transitional and Supportive Housing, Community Care Facilities for Seven or more Persons**

Congregate housing provides a range of support services for residents, including all meals, housekeeping and laundry service, private transportation, planned activity programs, and 24 hour emergency in-house call system. Emergency shelters, transitional and supportive housing programs, and community care facilities for seven or more persons offer similar amenities and support networks. Currently, to use the City's incentives to develop an elderly or disabled congregate care facility the City requires at least one household member to be 65 years of age or older, or to have a substantial physical impairment. Through program 12.1 incentives for congregate care housing would be offered without an age requirement to emergency shelters, transitional and supportive housing, and community care facilities of seven or more persons. In addition, the CUP requirement would not be required of transitional and supportive housing or emergency shelters. Additionally, the fees associated with the CUP for other forms of housing in this zone would be waived under program 12.3. The Multi-Family Congregate Housing for Elderly and Disabled Persons Overlay Zone applies to R-4 zones on sites which meet the following criteria:

- Site is located in area with 4 or 5 story height limits
- Site is located adjacent to commercial zoned areas, and is separated by an alley from commercial uses

- Site is located on a street greater than 30 feet in width

A map of the Multi-Family Congregate Housing overlay zone is provided at the end of this document. A total of 37.8 acres on 172 parcels within the R-4 zone meets these criteria for congregate housing. Of these parcels, the City sees 136 or 23.1 acres as having a potential for the development of congregate housing. Two senior living homes (i.e., nursing homes), with a total of 269 residential units, already exist in the congregate housing overlay area.

The City's development standards for congregate housing provide for densities of up to 165 units per acre, with up to 113 units permitted on any one site. In addition, the City provides significant reductions in the minimum unit size for congregate housing:

- 450 square feet for an efficiency unit
- 500 square feet for a one-bedroom unit
- 800 square feet for a two-bedroom unit

As presented earlier in Table 32, the City has adopted a reduced parking ratio for congregate housing of one space for one-bedroom units and 1.5 spaces for two bedroom units. The Planning Commission is authorized to provide further reductions of one-half space per unit.

The City is committed to providing opportunities for special needs housing and realizes that such housing forms typically require additional incentives to be viable. The incentives offered in the City's existing congregate care overlay zone offer greater unit numbers in a project and relax the requirements for parking and unit size. This offers greater potential to actually getting a project built as opposed to allowing these housing forms throughout the R-4 zone but in conformance with R-4 standards. Additionally costs for the CUP (if applicable) would be waived. A map of the overlay area is provided in the back of this document and shows that the overlay zone properties are in close proximity to public transportation, and areas with businesses to support daily needs and services. The overlay zone is residential and so provides the look and feel of living in a neighborhood, as opposed to alternative locations in the commercial zones. For these reasons the City feels that this overlay zone in concert with the incentives offered is a viable location for special needs housing.

#### ***Multiple-Family Residences for Elderly and Handicapped Persons (Deed-Restricted Affordable)***

Affordable independent multi-family housing for the elderly (age 62+) and disabled persons is permitted by conditional use permit in any zone allowing multiple-family residential uses. Densities of up to 165 units per acre are permitted, with a maximum project size of 150

units. Minimum unit sizes are not less than the maximum allowable under HUDs Section 202 senior housing program, with no more than five percent of project units permitted to be two-bedrooms. Building height shall be consistent with the prevailing height of surrounding buildings, and not greater than 60 feet. A reduced parking ratio of one space per unit is provided, with further reductions to 4/10 of a space per unit permitted at the discretion of the Planning Commission.

If the rental rates for any such senior or disabled housing are not under the provision of a federal, state, or other public agency, then the rental rates for any this housing will be set by the Planning Commission at affordable rental rates as a condition of issuing the conditional use permit.

### **Housing for Persons with Disabilities**

SB 520, signed into law in 2001, requires that Housing Elements analyze potential and actual governmental constraints on the development, maintenance and improvement of housing for persons with disabilities. The following analysis addresses Beverly Hills' regulations and procedures for housing for persons with disabilities with regards to: 1) zoning and development standards; 2) building codes; and 3) processing procedures. Based on the outcome of this analysis, the City's Housing Element establishes programs that address identified constraints and/or provide reasonable accommodations for housing designed for persons with disabilities.

### **Zoning and Development Standards**

Definition of Family: The California courts have invalidated the following definition of "family" within jurisdictions Zoning Ordinances: (a) an individual, (b) two or more persons related by blood, marriage or adoption, or (c) a group of not more than a certain number of unrelated persons as a single housekeeping unit. Court rulings state that defining a family does not serve any legitimate or useful objective or purpose recognized under the zoning and land planning powers of the city, and therefore violates rights of privacy under the California Constitution. A zoning ordinance also cannot regulate residency by discrimination between biologically related and unrelated persons.

While the Beverly Hills Zoning Ordinance does not contain an explicit definition of "family", the lack of such a definition has not functioned to preclude community care facilities from single or multi-family zone districts. Nonetheless, to address this potential constraint, the City will develop a definition of "family" which is inclusive and non-discriminatory for incorporation into the Zoning Code, as indicated in Housing Element Program 12.1.

Community Care Facilities: The Lanterman Developmental Disabilities Services Act (Lanterman Act) is that part of California law that sets out the rights and responsibilities of persons with developmental disabilities. The Lanterman Act impacts local zoning ordinances by requiring the use of property for the care of six or fewer disabled persons to be classified as a residential use under zoning. More specifically, a State-authorized, certified or licensed family care home, foster home, or a group home serving six or fewer disabled persons or dependent and neglected children on a 24-hour-a-day basis is considered a residential use that is to be permitted in all residential zones. No local agency can impose stricter zoning or building and safety standards on these homes. Due to the unique characteristics of larger community care facilities (housing more than six persons), most jurisdictions require a Use Permit to ensure neighborhood compatibility in siting. Smaller care facilities (housing up to six persons) are permitted by-right.

The Beverly Hills Zoning Ordinance makes no specific reference to community care facilities, and imposes no spacing or concentration requirements on such facilities. By way of practice and consistent with the Lanterman Act, the City permits small care facilities in residential zones and treats them as a residential use. Review of the California Community Care Licensing Division inventory of community care facilities (July 2010) identifies two residential care facilities for the elderly in Beverly Hills, providing capacity for over 200 seniors age 60 and above. As evidenced by the presence of these facilities, the City's regulations have not precluded the provision of community care facilities. Nonetheless, in order to better facilitate the provision of care facilities for persons with disabilities by providing greater certainty to protect applicants, a program (Imp 12.1) has been added to the Housing Element to amend the Zoning Ordinance to define and establish parameters for small and large Community Care facilities in compliance with the Lanterman Act. This will include: 1) identifying small Community Care facilities with six or fewer occupants as permitted in residential zones; and 2) identifying large Community Care facilities with seven or more occupants -as conditionally permitted in the same all multi-family residential zoning overlay districts as congregate housing for elderly and disabled persons.

#### **Other Zoning Provisions**

The City's Zoning Code facilitates housing for persons with disabilities in several ways, including:

- Allowances for property owners to build handicapped ramps into residential structures which encroach into the front, or side yard setbacks to allow first floor access for physically disabled residents.

- Allowances for elevators to encroach in the side yard setbacks on single-family properties to allow persons no longer able to climb stairs to remain in their homes.
- Reduced parking and unit size standards for multi-family congregate housing for elderly and disabled persons, and for affordable multi-family residences for elderly and handicapped persons.

The City permits housing for special needs groups, including for individuals with disabilities, without regard to distances between such uses or the number of uses in any part of the City.

### **Building Codes**

The City of Beverly Hills ensures that new housing developments comply with California building standards (Title 24 of the California Code of Regulations) and federal requirements for accessibility. For example, any new apartment development is subject to requirements under the Americans with Disabilities Act (ADA) for unit "adaptability" on ground floor units. Adaptable units are built for easy conversion to disabled access, such as doorway and hallway widths, and added structural support in the bathroom to allow the addition of handrails.

The City also allows residential retrofitting to increase the suitability of homes for persons with disabilities in compliance with accessibility requirements. Such retrofitting is permitted under Chapter 11, 1998 version of the California Code. Further, the City works with applicants who need special accommodations in their homes to ensure that application of building code requirements does not create a constraint.

### **Permits and Processing**

The City does not impose special permit procedures or requirements that could impede the retrofitting of homes for accessibility. The City's requirements for building permits and inspections are the same as for other residential projects and are straightforward and not burdensome. City officials are not aware of any instances in which an applicant experienced delays or rejection of a retrofitting proposal for accessibility to persons with disabilities.

The City of Beverly Hills implements procedures to ensure that reasonable accommodations are made for persons with disabilities. Individuals with disabilities and/or their family member(s), caretaker(s), or designee(s), on behalf of the disabled applicant, can telephone the City, send an e-mail, write a letter, stop by City offices, or appear at a Planning Commission or City Council meeting to request special accommodations or variances from the requirements of City Zoning or Building Codes for disability

accommodations. However, the City has not developed specific written procedures for requesting a reasonable accommodation, and therefore, as a means of facilitating such requests, has included a program in the Housing Element to develop procedures for reasonable accommodation requests with respect to zoning, permit processing, and building laws.

### **Summary of Constraints to Persons with Disabilities and Program Response**

The City has conducted a review of zoning, and building code, and processing requirements, and has not identified any actual barriers to the provision of accessible housing. However, to address potential barriers and better facilitate housing for persons with disabilities, the Housing Element sets forth the following program actions:

- Add a definition of “family” which is inclusive and non-discriminatory to the Zoning Code. (Program 12.1)
- Add a “Community Care Facility” category and definition to the Code. List community care facilities with six or fewer occupants as permitted in residentially zoned areas. Permit care facilities with 7 or more occupants with a conditional use permit in the all multi-family residential R-4 zoning overlay districts where congregate housing for elderly and disabled persons is allowed. (Program 12.1)
- Develop and adopt written procedures for reasonable accommodation requests with respect to zoning laws, permit processing, and building laws. Procedures will specify who may request an accommodation, time frames for decision-making and specific modification provisions. (Program 11.5)

### **Housing for Persons who are at Risk of Homelessness**

#### ***Transitional and Supportive Housing***

Transitional housing is typically defined as temporary (often six months to two years) housing for a homeless individual or family who is transitioning to permanent housing or for youth that are moving out of the foster care system.

Supportive housing is generally defined as permanent, affordable housing linked to on- or off-site services and occupied by a target population (i.e. persons with disabilities, suffering from mental illness or chronic health conditions).

Services typically include assistance designed to meet the needs of the target population in retaining the housing, living and working in the community, and/or improving health. Currently,

Beverly Hills' Zoning Ordinance does not contain specific provisions for the siting and development of transitional or supportive housing facilities. The City recently participated in the opening of a three month transitional living center, Upward Bound House, in Culver City, pledging \$200,000 in project support.

SB 2, effective January 2008, amended Housing Element law regarding planning and approval for transitional and supportive housing. Specifically, SB 2 requires transitional and supportive housing to be treated as a residential use and only subject to those restrictions that apply to other residential uses of the same type in the same zone.

In order to comply with the provisions of SB 2 and to clarify the City's intent with regard to treating transitional and supportive housing as a residential use, a program has been added to the Housing Element (Imp 12.1) to: 1) include transitional and supportive housing within the definition section of the Code; ~~and 2) treat as a residential use subject to the same requirements as other residential uses of the same type in the same zone;~~ 3) permit transitional and supportive housing that is configured as a single-family use by right in all residential zone districts, and permit such housing that is configured as multi-family use by right in the R-3 and R-4 zone districts. ~~list transitional and supportive housing as permitted uses within the same multi-family residential zoning overlay district as congregate housing for elderly and disabled persons subject to the same standards and permitting procedures as other residential uses.~~

### ***Emergency Shelters***

SB 2 also requires the Housing Element to address new planning and approval requirements for emergency shelters, defined as a facility that provides shelter to homeless families and/or individuals on a limited short-term basis.

Jurisdictions with an unmet need for emergency shelters for the homeless are required to identify a zone(s) where emergency shelters will be allowed as a permitted use without a conditional use or other discretionary permit. The identified zone must have sufficient capacity to accommodate the shelter need, and at a minimum provide capacity for at least one year-round shelter. Permit processing, development and management standards for emergency shelters must be objective and facilitate the development of, or conversion to, emergency shelters.

There are an estimated 47 chronically homeless persons that spend the majority of their days and nights in Beverly Hills, according to a homeless count the City conducted in January 2009. Beverly Hills has no emergency shelters within its City limits; however, the City

has provided funds for the construction and ongoing operation of emergency shelters operated by People Assisting the Homeless, and by Network of Care for Veterans and Service Members. Although nearby Westside shelters are over-capacity, it is not clear at this time whether Beverly Hills can be considered to have an unmet need for an emergency shelter.

Pursuant to SB 2, Beverly Hills has conducted a staff level review of its zoning districts and has determined that areas within the R-4 multi-family residential zoning overlay district where congregate housing for elderly and disabled persons is allowed are the most conducive to provision of an emergency homeless shelter by right. This district is characterized as a high density multi-family zone consisting of a variety of existing apartment buildings and condominiums. Within the approximately 37.8 acre (172 properties) area there are four vacant parcels, as well as numerous older and/or underutilized residential properties. In summary, there are sufficient properties within the proposed area to provide opportunities for an emergency shelter, either through conversion of an existing building or new construction on a vacant or underutilized parcel. Additionally, the overlay zone provides close access to needs and services such as grocery stores, pharmacies, and transportation.

The City has included a program within the Housing Element (Imp. 12.1) to modify the Zoning Code to permit shelters within the multi-family residential zoning overlay district where congregate housing for elderly and disabled persons is allowed. Development standards within the district located in the Southerly Zone of the City (BHMC 10-2-303; LOTS: A.) are appropriate to facilitate emergency shelters, and can be summarized as follows:

- Height: up to 60 feet, or five stories
- Minimum Lot Size: 7,500 square feet
- Minimum Public Street Frontage: 55 feet
- Setbacks:
  - Front - 15 feet
  - Side (total) 19 - 23 feet

Pursuant to SB 2, the City can specify written, objective standards to regulate the following aspects of emergency shelters to enhance compatibility:

- The maximum number of beds or persons permitted to be served nightly by the facility;
- Off-street parking based on need, but not to exceed requirements for other residential or commercial uses in the same zone;

- The size and location of exterior and interior onsite waiting and client intake areas;
- The provision of onsite management;
- The proximity of other emergency shelters, provided that shelters are not required to be more than 300 feet apart;
- The length of stay;
- Lighting; and
- Security during hours that the emergency shelter is in operation.

### ***Single Room Occupancy (SRO)***

Single Room Occupancy (SRO) residences are small, one room units occupied by a single individual, and may either have shared or private kitchen and bathroom facilities. SROs are rented on a monthly basis typically without rental deposit, and can provide an entry point into the housing market for extremely low-income individuals, formerly homeless and disabled persons.

Beverly Hills' Zoning Code does not currently define single room occupancy uses. The City has reviewed the Zoning Code, and similar to emergency shelters, has determined that within the multi-family residential zoning overlay district where congregate housing for elderly and disabled persons is allowed are the most conducive to the provision of SROs. The Housing Element includes a program (12.1) to define and establish parameters within this area for the development of SRO residences.

### **Mobile Homes**

No mobile homes or mobile home parks are located in the community. Pursuant to state law, the City permits manufactured housing placed on a permanent foundation in all residential zones.

### **Farm Employee Housing**

The Census identifies 22 Beverly Hills residents employed in farming, fishing and forestry occupations, accounting for only 0.1 percent of the City's labor force. These occupations include gardeners, landscapers, and person who work in plant nurseries. Given the extremely limited presence of "farmworkers" in the community, the City has not identified a need for specialized farmworker housing beyond overall programs for housing affordability.

### **Development Review Process**

All residential development is reviewed by City staff for zoning, building, and fire code compliance prior to issuance of construction permits.

### **Single-Family Housing Review Process**

New single family homes that overpower the general local neighborhood scale "lot to house size" ratio ("mansionization") are a concern to the community. To address this issue, all single-family residential development located in the "Central Area of the City" (basically all areas below Sunset Blvd.) must be first reviewed and approved by the Director of the Community Development Department, or the Design Review Commission, based on whether the project complies with the City's published design guidelines.

#### ***Director Review***

A proposed residential development is reviewed to determine whether it substantially adheres to the architectural style as outlined in the Single-family Design Review Catalogue. If the required review determines that the proposed development adheres to the architectural style within the catalogue, and meets all of the applicable development standards, the development may be granted a design review entitlement by the Director of Community Development without further design review.

#### ***Commission Review of Single Family Projects***

Projects that do not comply with a style in the City's guidelines are reviewed by the Design Review Commission. The Design Review Commission reviews proposed single-family residential development and its impact on the streetscape by controlling the mansionization of the City's residential neighborhoods, which would degrade and depreciate the character, image, beauty, and reputation of the City's residential neighborhoods with adverse consequences for the quality of life of all residents. Design Review Commission decisions involve a noticed public hearing, and decisions are appealable to the Planning Commission and ultimately to the City Council.

#### ***Design Guidelines***

The City provides guidelines to the public on what would constitute acceptable design. This City's design guidelines, titled the "Residential Design Style Catalog", are available for reviewing and download on the City's website. The catalogue includes the following housing design styles:

- American Colonial
- Rural European Revival
- Spanish Colonial
- Contemporary
- Period Revival

Other design styles can be considered if the design is architecturally true to textbook definitions.

### Review Process

The City has a dedicated staff person who works with applicants on single-family related design. The City provides an application packet that includes a process flowchart and instructions for submitting a complete set of plans. Decisions made by City staff or the Design Review Commission are rarely appealed.

1. The first step in the process is for City staff to determine if the proposed project can be reviewed by the director, or if it warrants review by the Design Review Commission.
2. Once a determination is made, the applicant is informed in writing and they are invited to submit either a "Track 1", or a "Track 2" application. Track 1 applications are reviewed by City staff and ultimately, the director. Track 2 applications are reviewed by the Design Review Commission.
3. Staff-level project reviews are typically processed within 30 days.
4. Commission reviewed projects are typically processed within 60 days.
5. The Design Commission review includes a public hearing. The Commission considers the following findings in their review:
  - a. The proposed development's design exhibits an internally compatible design scheme;
  - b. The proposed development's design appropriately minimizes the appearance of scale and mass and enhances the garden like quality of the city and appropriately maximizes the use of required open space within the proposed architectural style;
  - c. The proposed development will enhance the appearance of the neighborhood;
  - d. The proposed development is designed to balance the reasonable expectation of development for the owner with the reasonable expectation of privacy of neighbors; and
  - e. The proposed development respects prevailing site design patterns, carefully analyzing the characteristics of the surrounding group of homes, and integrates appropriate features that will ensure harmony between old and new.

### **Multi-Family Housing Review Process**

#### ***Development Plan Review Entitlement Required***

All multi-family residential projects are subject to the City's Development Plan Review (DPR) process. Projects with five or more units are reviewed by the Planning Commission; projects with four or fewer units are reviewed at the staff-level. Development Plan

Review involves evaluating the proposed development for General Plan consistency and compatibility to the area in which the development is proposed to be located. The review focuses on site plan, building layout, and building amenities. Use of multi-family properties are considered to be for multi-family residential purposes and therefore, use is not part of the review.

#### ***Other Entitlements that May Be Required***

In addition to the Development Plan Review requirements, if a building does not meet all of the basic R-4 Zone standards, the applicant may apply for an R-4 permit. If the deviation from the basic standards meets specific criteria, an R-4 Permit allows for the reduction in development standards for setbacks, building height, articulation of the building façade, building length, depth of garages that encroach into the front yard setback and the amount of paving in the front yard. An R-4 permit is also required to allow residential units to be constructed above existing detached garages. The Planning Commission typically reviews the R-4 permit at the same time as the development plan and the tentative map.

#### ***Incentives for Development of Assisted Living or Independent Living for the Elderly or Disabled Housing***

The City's municipal code allows for the development of senior and disabled housing anywhere housing is allowed in the City. In the City's multi-family districts, senior and disabled housing can be constructed at a unit density greater than would be allowed for other types of housing (up to 165 units/ acre), provided that the project obtains a conditional use permit and units are deed-restricted as affordable. In select areas of the City's multi-family districts, congregate care facilities for the elderly and persons with disabilities can also be constructed at unit densities greater than would otherwise be allowed (up to 165 units/ acre) with a conditional use permit. Furthermore, the City's Code provides for significant reductions in parking and minimum unit sizes for senior and disabled housing.

#### ***Commission Review of Multi-Family Projects***

Most multi-family residential and some single-family residential development require review by the Planning Commission. The Community Development Department offers a "one-step" process where the formal Planning Commission review application will be made through the City's Permit Center and routed to all applicable departments such as Fire and Engineering. A concept meeting is held with the applicant within 30 days from acceptance of a complete application. If there are no revisions to the plans, a hearing is scheduled before the Planning Commission.

### *Planning Commission Review*

The Planning Commission reviews development plans for all multi-family projects with more than four units, second unit permits, condominium conversions, and all requests for modifications to the City's development standards. The Planning Commission review process involves a public hearing, findings, resolution, and covenant. Typically, projects move through the process, from initial submittal to approval in 90 days (30 days to determine if the application is complete, 60 days to process).

The findings used by the Planning Commission in the Development Plan Review process are:

- A. The proposed plan is consistent with the general plan and any specific plans adopted for the area.
- B. The proposed plan will not adversely affect existing and anticipated development in the vicinity and will promote harmonious development of the area.

For those proposed plans to be located in the C-5 zone that are reviewed by the planning commission, the commission shall consider the factors set forth in section 10-3-2021 of this chapter as part of the commission's determination regarding whether a project will promote harmonious development of the area.

- C. The nature, configuration, location, density, height and manner of operation of any commercial development proposed by the plan will not significantly and adversely interfere with the use and enjoyment of residential properties in the vicinity of the subject property.
- D. The proposed plan will not create any significantly adverse traffic impacts, traffic safety hazards, pedestrian-vehicle conflicts, or pedestrian safety hazards.
- E. The proposed plan will not be detrimental to the public health, safety or general welfare.

The Planning Commission reviews the tract map and site plan, and confirms that the project conforms to the general plan and zoning code. This includes a review of vehicle flow and pedestrian access. In areas served by alleys, the Planning Commission encourages new projects to orient vehicle access off the alley to limit the number of vehicles crossing the sidewalk. The Planning Commission also encourages new projects to be designed with a main entrance facing the street to continue the existing pedestrian-orientation of buildings to the sidewalk.

The Planning Commission was established more than 50 years ago and the Commission's review is based on site planning and potential traffic generation. Potential uncertainty in the City's review

process related to meeting the finding of "... (promoting) harmonious development of the area" is addressed through a focused review of site plan orientation and traffic generation, and a reliance on past precedence. The findings used by the Planning Commission to evaluate applications for development plan review entitlements have been in place since the early 1990's and constitute a substantial body of cases to reference in determining the appropriateness of future applications.

In addition, the City has six professionals dedicated to working with project applicants on zoning entitlement submittals. One of those professionals is dedicated to staffing the City's public counter and is a resource made available to assist applicants with zoning conformity and entitlement submittal requirements in advance of submitting a project.

Recently the City has established a development review taskforce to review and assure that development applications progress efficiently through the City's review processes. Part of the taskforce's oversight with focus on assurances in the development review process and will result in an expansion of the City's current system. The City's current system includes the dedicated public counter zoning professional, along with the five dedicated entitlement processing professionals, informational materials, and application submittal requirements. The current system will be evaluated annually in conjunction with the Annual Housing Element Report to HCD and any uncertainty in the development review process will be identified and procedures will be modified as needed to increase certainty (Imp. 12.4 Monitor the Development Review Process).

As additional streamlining effort the City will be implementing is priority review of projects that include affordable housing units.

Program 12.4 ensures that an applicant will be able to use the City's available informational resources, meet with public counter staff and entitlement case management staff, submit an application and all necessary supporting materials, and with certainty be assured their project will proceed through the review process in an efficient manner.

#### *Architectural Commission Review*

The Architectural Commission reviews the architectural qualities of all multi-family projects, and all commercial or mixed-use projects. The Architectural Commissions review focuses only on the outside of the building and the building's landscaping and includes a review of architectural features, final finishes and colors.

Typically, a project is scheduled for review by the Architectural Commission as soon as it is approved by the Planning Commission. From start to finish, the Architectural Commission's review takes a maximum of 60 days. The Commission's review includes a public hearing and approval is provided in a letter to the applicant.

The findings used by the Architectural Commission in the Architectural Review process are:

- A. The plan for the proposed building or structure is in conformity with good taste and good design and, in general, contributes to the image of Beverly Hills as a place of beauty, spaciousness, balance, taste, fitness, broad vistas, and high quality;
- B. The plan for the proposed building or structure indicates the manner in which the structure is reasonably protected against external and internal noise, vibrations, and other factors which may tend to make the environment less desirable;
- C. The proposed building or structure is not, in its exterior design and appearance, of inferior quality such as to cause the nature of the local environment to materially depreciate in appearance and value;
- D. The proposed building or structure is in harmony with the proposed developments on land in the general area, with the general plan for Beverly Hills, and with any precise plans adopted pursuant to the general plan; and
- E. The proposed development is in conformity with the standards of this code and other applicable laws insofar as the location and appearance of the buildings and structures are involved.

The Architectural Commission was established more than 50 years ago and over the course of its existence a methodology to objectively reviewing applications has been developed based on precedent. The process includes the following:

The City has a planner dedicated to working with project applicants on architectural submittals and the City takes measures to assure that applicants are informed of submittal requirements at the time the application is initially submitted to the City. The City keeps a collection of sample review materials, such as material boards and renderings. The City also awards projects annually which possess exemplary architecture and those awarded projects are photographed and made available to the public on the City's website. By reviewing the City's examples of exemplary architecture and submittal samples, and meeting with the City's dedicated planner a project applicant can be assured their project will proceed through the review process in an efficient manner.

### **Expedited Plan Check**

At this time, the Planning Division does not provide an expedited review process for multi-family projects. The Building and Safety Division does provide an expedited plan check option which can reduce plan check times from six weeks to three weeks.

### **Environmental Review Process**

Residential projects developed consistent with the General Plan and Zoning Code in most cases are categorically exempt from environmental review. Only when the new project would demolish a building determined to be of historic significance would additional environmental review be performed (additional environmental review would also be required in some instances for projects that disrupt natural habitats, however, Beverly Hills is located in a dense urbanized area and there is very little to no natural habitat remaining in the city which would warrant additional review).

Typical timeframes for the environmental review is as follows:

<b>Type of Review</b>	<b>Processing Time</b>
Categorical Exemption	2 months
Negative Declaration/ Mitigated Negative Declaration	4 months
Environmental Impact Report	12 months

SOURCE: City of Beverly Hills, July 2010

### **Building Codes and Enforcement**

Building Codes regulate the physical construction of dwellings and include plumbing, electrical, and mechanical divisions. The purpose of the Building Code and its enforcement is to protect the public from unsafe conditions associated with construction. The City of Beverly Hills enforces the California Building Code standards (Title 24) for existing units, new construction, and residential rehabilitation. State law affords local government some flexibility when adopting the uniform codes; the building codes can be amended based on geographical, topographical, or climate considerations. Further, state housing law provides that local building departments can authorize the use of materials and construction methods other than those specified in the uniform code if the proposed design is found to be satisfactory and the materials or methods are at least equivalent to that prescribed by the building codes.

The Beverly Hills City Council finds that certain changes and modifications are necessary in the adoption of the California Building Code because specific local conditions in the city involve climatic conditions which present severe fire hazards to buildings, structures and occupants because of the semiarid climate; the city's location which is partially in a hillside and mountainous area and partially on an alluvial plain; topographical conditions which create a hazard because of steep hillsides and the proximity of hills and canyons; and because of soil conditions in some areas which require testing prior to construction. Modifications to the Building Code are designed to meet the requirements of local needs, and can be summarized as follows:

- Re-adoption of current amendments to the State Building Code requiring additional seismic standards
- Amendments to the State's 2010 Green Building Standards Code (CALGreen) and the State's 2010 California Residential Code establishing a tiered set of requirements for new development

The City doesn't believe these amendments to the State building codes will affect the cost and supply of housing in the City for the following reasons:

- Past development activity (both entitlement and construction) has demonstrated sufficient interest and ability within the building industry to continue development of housing units at amounts desired by the State through the RHNA process.
- The City offers unit size and parking reductions, and unit density incentives for the development of senior and congregate housing projects. It is expected these incentives should counter-balance additional project costs associated with meeting the City's added requirements. Additionally, the City intends to carry out the following programs, further incentivizing the production of affordable housing
  - 10.1 Density Bonus - modify the City's existing program to include specific waivers and incentives
  - 10.3 Housing Trust Fund - set aside money to be used in the development of affordable housing
  - 10.7 Partnerships with Affordable Housing Developers - increase the power of the City's investment in affordable housing by partnering with NGO's able to compete for other funding sources, such as affordable housing grants
  - 11.2 Senior Housing Development - further incentivize the development of affordable senior housing

- o 12.2 Adjust Development Standards - modify the City's multi-family development standards to incentivize a broader range of housing options
- o 12.3 Reduced Fees for Affordable Housing - provide additional incentives for affordable housing in the form of fee reductions

## Fees

The City of Beverly Hills requires all new residential projects to go through a zoning review for entitlements, and a plan review for building permits. The Community Development Department oversees both review processes in coordination with the City's Public Works Department (Engineering, and Public Services).

### Entitlement Processing Fees

The following charts identify the fees associated with the entitlement part of a new housing project. Tables 35 and 36 include fees associated with multiple family projects. Table 37 includes fees associated with single family projects.

#### Multi-Family Housing Projects - Fees

<b>Table 35 Planning Fees for New Multi-Family Residential Projects</b>	
<b>Project Type/ Entitlement</b>	<b>Cost</b>
<b>New Apartment Projects</b>	
Development Plan Review (10-3.2570)	
Commission-level (Planning Commission)	\$12,302.80
Architecture/ Landscape Plan Review (10-3.3016)	
Commission-level (Architectural Commission)	\$5,955.30
Environmental Review	\$276.50
Covenant Processing (upon entitlement)	\$447.00
Zoning Confirmation (upon submittal for building permits)	\$701.30
<b>Total Fees</b>	<b>\$19,682.90</b>
<b>New Condominium Projects</b>	
Tentative Parcel/ Tract Map Review (Vesting and Non-Vesting)	\$14,133.20
Development Plan Review (10-3.2570)	
Commission-level (Planning Commission)	\$2,522.50
Architecture/ Landscape Plan Review (10-3.3016)	
Commission-level (Architectural Commission)	\$5,955.30
Environmental Review	\$276.50
Covenant Processing (upon entitlement)	\$447.00
Zoning Confirmation (upon submittal for building permits)	\$701.30

<b>Table 35 Planning Fees for New Multi-Family Residential Projects</b>	
<b>Project Type/ Entitlement</b>	<b>Cost</b>
Final Parcel/ Tract Map Review (Vesting and Non-Vesting)	
Zoning Review	\$427.20
Engineering Review	\$3,100.00
<b>Total Fees</b>	<b>\$27,563.00</b>
<b>Conversion Projects (Apartments to Condominiums)</b>	
Common Interest Development Review <sup>a</sup>	\$16,748.10
Tentative Parcel/ Tract Map Review (Vesting and Non-Vesting)	\$2,522.50
Environmental Review	\$276.50
Final Parcel/ Tract Map Review (Vesting and Non-Vesting)	
Zoning Review	\$427.20
Engineering Review	\$3,100.00
<b>Total Fees</b>	<b>\$23,074.30</b>

<b>Table 36 Multi-Family Residential Projects Requiring Additional Discretionary Review</b>	
<b>Entitlement (Potential Entitlements and Fees in Addition to the Base Entitlements and Fees for projects not complying with the General Plan and Zoning Code)</b>	<b>Cost</b>
Multiple Application Fee (for projects with multiple applications for a single commission, the highest cost is applied and then all additional applications are set at this rate if actual cost would be higher) - the Multiple Application Fee does not apply to applications that are before separate commissions.	\$2,522.50
Character Contributing Structural Review (07-R-12338) (To request an Apartment to Condominium Conversion without upgrading the existing building to all current zoning, and building and safety code requirements. Evaluates an existing multi-family residential building's structure and identifies necessary upgrades for safety/ seismic safety.)	\$7,465.40
Density Bonus Permit (10-3.1524)	\$6,151.40
R-4 Permit -	
Commission Level (w/o another application)	\$6,151.40
Staff Level (w/o another application)	\$3,856.90
With Another Application	\$2,203.10
Variance (10-3.2804) (Reduction in parking, or set-backs based on irregularity of the site)	\$11,145.80
General Plan Amendment (Cal. Gov. Code) (plus full costs of processing the application)	\$12,224.30
General Plan Amendment with a Zone Change	\$9,350
General Plan Amendment without a Zone Change	\$6,190
Zone Change (10-3.3904) (plus full costs of processing the application)	\$16,872.20
Environmental Assessment (Negative Declaration)	\$1,130
Environmental Impact Report <sup>a</sup>	\$6,190

*Single-Family Housing Projects - Fees*

<b>Table 37 Planning Fees for Single-Family Residential Projects</b>	
<b>Project Type/ Fees</b>	<b>Cost</b>
<b>New Single-Family Residence Projects using an architectural type listed in the City's architectural design guidelines</b>	
Staff Level Plan Review (Development, Architectural, Landscape) (10-3.4612)	\$1,902.30
Environmental Review	\$276.50
<b>Total Fees</b>	<b>\$2,178.80</b>
<b>New Single-Family Residence Projects <u>not</u> using an architectural type listed in the City's architectural design guidelines</b>	
Commission Level Plan Review (Development, Architectural, Landscape) (10-3.4612)	\$6,210.30
Environmental Review	\$276.50
<b>Total Fees</b>	<b>\$6,486.80</b>
<b>Non-Compliant Single-Family Residential Projects</b> (Potential Fees In Addition to the Base Fees for projects not complying with the General Plan and Zoning Code)	
R-1 Permits (Single Family Review, Central R-1, Hillside, Trousdale)	\$6,430

SOURCE: City of Beverly Hills Community Development Department, May 2007  
a. Includes condominium conversions  
b. 50 percent of these fees will be credited towards any future fees for a substantially similar project submitted within 6 months  
c. For consultants for project requiring environmental impact review (EIR) or legislative/code changes  
d. Plus a deposit for staff time to be determined by staff with charges at the fully allocated hourly rates for the project for contract planner/engineer plus any outside costs. This fee would include any mitigation monitoring programs that are required.

**Development Plan Review/ Building Permits - Multi-Family and Single-Family Housing Projects - Fees**

Development review and building permit fees are summarized in the table on the following page. The City's fee structure is based on total valuation and the same fees are applied to multi-family and single-family projects.

Plan Check Review (Zoning Review)	\$701.30
Final Parcel/ Tract Map Review (Vesting and Non-Vesting)	
Zoning Review	\$427.20
Engineering Review	\$3,100.00
Building Permit Plan Check (Percent of total valuation)	12%

<b>Building Permit (Percent of total valuation)</b>	
\$0 - \$500	\$59.10
Each additional \$100 over the first \$100, up to \$1,000	\$9.50
Each additional \$1,000 over the first \$1,000, up to \$20,000	\$38.90
Each additional \$1,000 over the first \$20,000 up to \$50,000	\$22.70
Each additional \$1,000 over the first \$50,000 up to \$100,000	\$16.70
Each additional \$1,000 over the first \$100,000 up to \$500,000	\$15.30
Each additional \$1,000 over the first \$500,000	\$13.00
<b>Shoring Permit</b>	
0 < \$1 Million	4.5%
\$1 Million < \$5 Million	4.0%
\$5 Million < \$10 Million	2.1%
\$10 Million +	4.5%
<b>Grading Permit</b>	
0 < \$1 Million	2.5%
\$1 Million < \$5 Million	2.0%
\$5 Million < \$10 Million	2.0%
\$10 Million +	4.0%
<b>Mechanical Permit</b>	
Issuance of permit	\$51.80
Plus 8.33% of Building Permit Fee	
<b>Plumbing Permit</b>	
Issuance of permit	\$51.80
Plus 8.33% of Building Permit Fee	
<b>Electrical Permit</b>	
Issuance of permit	\$51.80
Plus 8.33% of Building Permit Fee	
<b>Utility Connections (not including replacement of sewer lateral)</b>	
	\$865.40
<b>Off Site Improvements</b>	
Replacement of Sewer Lateral	\$329.50
Sidewalk Replacement Use Permit	\$95.70
Curb and Gutter Permit	\$37.20
Curb Drain Use Permit	\$313.60
Paving Replacement Inspection (\$0.30/square foot x 2,000 sq ft)	\$600.00
Construction Barricade Permit	\$154.20
Utility Permit	\$154.20
Hauling/ Street Use (Heavy Haul Permit)	\$239.20
<b>Street Improvements (Street Tree Protection)</b>	
	\$2,026.35

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### **Impact Fees and Exactions**

Cities use exactions and impact fees to assure that a desired standard for public services and facilities is maintained. The City of Beverly Hills charges impact fees and exactions on all new residential development in the city to offset increased use of public infrastructure, public spaces, and services from future residents.

The effect that exactions and impact fees have on the cost of housing is proportional to the amenities and services provided by the exactions and impact fees. Exactions and impact fees do increase the cost of housing; however when implemented well the increased cost results in higher property values and greater public desirability for the housing. The public's desire results from the quality of the housing product, and from the public services and amenities available to the residents.

For housing sold at market rate, exaction and impact fees are a cost that is factored into the overall cost of the project. A market rate housing developer covers the increase in costs due to exactions and impact fees by building a higher quality product which in turn can be sold at a higher price. A person is more willing to pay the higher price for the housing because it is higher quality, and because of the services and amenities provided by the exactions and impact fees. Therefore, the cost of maintaining the City's standards for public amenities and services is shared in part by the future residents.

<b>Table 38 Exactions &amp; Impact Fees - Fiscal Year 2010-11</b>	
<b>Type of Fee</b>	<b>Fee</b>
Dwelling Unit Tax	\$1,041.30/unit + \$206.80/bedroom
Condo Conversion Fee	\$7,104.40/unit
School Fee—Residential	\$2.97/sf
Parks and Recreation Construction Tax	\$7.10/sf

SOURCE: City of Beverly Hills, July 2010

Exactions and impact fees can present a challenge in the development of affordable housing, since these costs cannot easily be passed on to the, would be, future resident as is the case with market rate housing. The City currently exempts dwelling units for very low, low and moderate income households from the dwelling unit tax and parks and recreation construction tax. Housing Element Program 12.3 calls for the City to conduct a fee study, and evaluate the economic benefit of providing additional waivers or reductions of certain fees for projects containing affordable units.

**Total Fees and Exactions for a Typical Multi-Family Project**

Total fees for a typical multi-family project are given in the following table. The City feels this project is a typical multi-family project based on the number of units and the lot size. This project involved three properties and produced 22 new condominium units. The total fees charged by the City amounted to \$822K, which is \$37,400 per

unit. Units in this building are being sold for \$3 Million dollars and so the City's fees amount to approximately 1.2% of a unit's sale price.

Project Description - 447 North Doheny Drive. 3 lot development (447, 449, 451). 0.48 acres total. 22 condominium units.	
Total Fees	\$822,901.76
Description	Cost
Tentative Parcel/ Tract Map Review (Vesting and Non-Vesting)	\$2,522.50
Development Plan Review (10-3.2570)	
Commission-level (Planning Commission)	\$9,439.70
Architecture/ Landscape Plan Review (10-3.3016)	
Commission-level (Architectural Commission)	\$1,032.10
Environmental Review	\$276.50
Public Noticing (On-site Signage)	\$150.30
Covenant Processing (upon entitlement)	\$447.00
Plan Check Review (Zoning Review)	\$701.30
Final Parcel/ Tract Map Review (Vesting and Non-Vesting)	
Zoning Review	\$427.20
Engineering Review	\$3,100.00
Building Permit Plan Check	\$97,883.48
Building Permit	\$611,315.22
Shoring Permit	\$4,267.60
Grading Permit	\$3,117.00
Mechanical Permit	\$7,704.13
Plumbing Permit	\$7,714.13
Electrical Permit	\$10,570.42
Utility Connections (not including replacement of sewer lateral)	\$865.40
Off Site Improvements	
Replacement of Sewer Lateral	\$329.50
Sidewalk Replacement Use Permit	\$95.70
Curb and Gutter Permit	\$37.20
Curb Drain Use Permit	\$313.60
Paving Replacement Inspection (\$0.30/square foot x 2,000 sq ft)	\$600.00
Construction Barricade Permit	\$154.20
Utility Permit	\$154.20
Hauling/ Street Use (Heavy Haul Permit)	\$239.20
Street Improvements (Street Tree Protection)	\$2,026.35
School Fees (\$2.97 sqft x 5,700 square feet)	\$16,929.00
Parks and Recreation (QUIMBY) Fee (\$7.10 sqft x 5,700 square feet)	\$40,470.00

### **On and Off-Site Improvements**

Site improvements encompass the range of water, sewer, circulation, and other infrastructure needed to support development. In Beverly Hills site improvements include water and sewer and storm drain laterals, streets, curbs, gutters, parkway, street trees, sidewalks and alleyways. The City uses a standard street width of 46-foot curb-to-curb within a 70-foot right-of-way for local residential (multi-family) streets and secondary arterial streets, and a standard street width of 36-foot curb-to-curb within a 60-foot right-of-way for local residential (single-family) streets. All residential streets are improved with 6-foot parkways and 6-foot sidewalks on both sides of the street.

To ensure that adequate improvements are in place, Beverly Hills requires pro-rata payments for off-site extension of the water, sewer and storm drain systems, and pro-rata payments for transportation improvements. In larger projects, the City requires developers to construct internal streets, sidewalks, curbs, gutters, and affected portions of off-site arterials. However, development in Beverly Hills typically occurs on small infill parcels where infrastructure is already in place.

While on and off-site improvements add to the cost of development and thus impact affordability, it is standard for jurisdictions to require development to “pay its own way.” Beverly Hills site improvement requirements are deemed necessary to maintain the quality of life desired by residents, and are consistent with General Plan goals to ensure that public services and facilities are in place at the time of need, thus avoiding the overloading of existing urban service systems.

### **Environment and Infrastructure**

Environmental and infrastructure constraints can limit or affect the type and density of housing development in a community. These constraints can include natural resources such as topography and flood areas, hazards/safety concerns, or lack of sufficient infrastructure capacity. However, as discussed in greater detail below, Beverly Hills is a built-out community with little remaining vacant land, with the majority of the City’s infrastructure systems already in place. Environmental and infrastructure concerns do not compose a significant constraint to housing production.

## ***Environmental Constraints***

### *Seismic Hazards*

The City of Beverly Hills contains both active and potentially active faults. Specifically, three active or potentially active faults are located within the city limits, including: the Hollywood Fault, the Santa Monica Fault, and the Newport-Inglewood Zone of Deformation. (Woodward-Clyde 1987) Since the 1987 Study was completed, work completed by Dolan, et al and the California Division of Mines and Geology maps show the Hollywood and Santa Monica faults as converging within the City, and the Newport-Inglewood fault located approximately two miles south of the City.

The City of Beverly Hills implements the most recent California Building Code. In addition, the City's Seismic Safety Program promotes public safety and welfare by reducing the risk of death or injury that may result from the effects of earthquakes on existing unreinforced masonry bearing wall buildings.

### *Landslides and Slope Hazards*

The hillside areas of Beverly Hills pose the greatest hazard of landslides. Surface movements in the hillside area could be triggered by heavy rain, a reservoir breach, pumping facilities or an earthquake. Hillside development has placed additional loads on the subsurface bedrock. Additionally, improper site grading, steep slopes, and loss of vegetation can increase the potential for localized landslides. In the canyon areas, the presence of subsurface water and geology composition provides the potential for liquefaction during earthquakes. Any significant hillside movement along canyon streets would potentially isolate populations in those areas due to limited ingress egress routs. Potential damage to underground utilities and fire hydrants could also result from landslide movement. Future growth in the canyon areas of the City may be limited due to safety factors.

### *Flooding Hazards*

There are not FEMA designated flood zones in the City of Beverly Hills. The City of Beverly Hills is located within the Ballona Creek Watershed; however most of the drainage is controlled by structural flood control measures along a mostly channelized watershed. Approximately 40 percent of the watershed within the City is covered by impervious surfaces leading to greater surface area for storm runoff and the potential for flooding.

FEMA has classified the City under Flood Zone "C," which does not require mandatory flood mitigation enforcement.<sup>20</sup> However, Beverly Hills is highly urbanized and as a result of increased paving, can lead to an increase in volume and velocity of runoff after a rainfall event, exacerbating the potential flood hazards. The City's steep hillside areas are also more susceptible to runoff and slope failures. New development in these areas will require careful adherence to current grading, soil compaction, maximum slope, and drainage regulations.

The Federal Emergency Management Agency (FEMA), as part of its statutory responsibilities to carry out the National Flood Insurance Program, has mapped most of the flood risk areas within the United States. The City of Beverly Hills is located in a FEMA Flood Zone "C", which does not require mandatory flood mitigation enforcement. Properties are not required to carry flood insurance (Hazard Mitigation Action Plan 2004 pp.149).

The City of Beverly Hills also lies in the inundation path of the Lower Franklin Canyon Dam which is located north of the City. The reservoir has a 200 acre-feet capacity and can be drained to half capacity in 72 hours and completely emptied in 216 hours. The National Inventory of Dams characterizes this dam with significant hazard potential. Dams with significant hazard potential are those in which failure or mis-operation would result in no probable loss of human life but can cause economic loss, environmental damage, and disruption of lifeline facilities. In the event of a breach of the Lower Franklin Reservoir, the residential area north of Carmelita Drive would be exposed to immediate and severe danger. Below that point, the danger diminishes rapidly although flooding of most structures in this section of the inundation path would occur. Approximately 1,200 people live in the sector of the inundation area subject to severe danger and provision for evacuation of this population is required in the event of a breach in the structure. This reservoir, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure.

The possibility of dam failures during an earthquake has been addressed by the California Division of Mines and Geology in the earthquake planning scenarios for a magnitude 8.3 earthquake on the San Andreas Fault zone and a magnitude 7.0 earthquake on the Newport-Inglewood fault zone (Davis 1982). These studies found that catastrophic failure of a major dam as a result of a scenario earthquake is regarded as unlikely (Davis 1982). Current design and

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<sup>20</sup> City of Beverly Hills Hazard Mitigation Plan, September 2004.

construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake (MCE) for the Incentive Area. FEMA requires that all reservoir owners develop Emergency Action Plans (EAP) for warning, evacuation, and post-flood actions. Although there may be coordination with county officials in the development of the EAP, the responsibility for developing potential flood inundation maps and facilitation of emergency response is the responsibility of the reservoir owner.

The City recently updated its Safety Element and hazard mitigation plan. Those documents included flood hazard mitigation intended to minimize potential risks associated with flooding, including dam or reservoir failure inundation hazards. Furthermore, any project implemented would be required to undergo project-specific environmental review, at which time specific mitigation or design changes would occur to reduce the exposure of people or structures to flooding. Therefore, potential impacts associated with flooding were found to be less-than-significant in the General Plan environmental review and are not considered a constraint to new housing production.<sup>21</sup>

#### *Wildland Fire Hazard*

Beverly Hills is bounded on the north by hillside and canyon areas. Canyons that empty into the City's boundaries are Benedict, Franklin, Coldwater, and Trousdale Canyons. Benedict, Coldwater, and Trousdale Canyons are densely populated, with Franklin Canyon the least developed of the four. The dense wild brush of Franklin Canyon extends to the boundaries of the City. Due to the extensive hazards originating in the hills north of Sunset Boulevard, the area has been designated a Very High Fire Hazard Severity Zone (VHFHSZ).

Approximately 36 percent of the City is located in the VHFHSZ, with approximately 1,640 single-family residences and 3,700 people.

#### *Urban Fire Hazard*

In the built-out areas of the community, the primary fire hazard risks are man-made. Beverly Hills is home to three very large hotels having occupancies in excess of 500 persons per day, 33 high-rise buildings, and a densely populated retail and commercial district. Of particular concern are two high-rise buildings that are residential occupancies and did not fall under the 1998 retrofit sprinkler mandate imposed on buildings 55 feet or higher. These are the only

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<sup>21</sup>Beverly Hills General Plan EIR, 2008

two high-rise buildings in the City that are not equipped with sprinkler systems.

New affordable housing development within the City is expected to occur through the infill of existing sites and mixed-use development in commercial areas. Limited future market rate development is expected to occur in the hillside areas. Wildland fire risks for new development are mitigated by various City programs described below.

#### *Fire Prevention and Suppression Programs*

In 1998, the Beverly Hills Fire Department (BHFD) installed a Remote Automated Weather Station (RAWS) in the hillside area just outside the City in Franklin Canyon. Data from the RAWS assists fire officials in determining the need for augmenting or redeploying fire resources depending on current and anticipated weather conditions.

For the VHFHSZ, The BHFD has also developed "Pre-Attack Plans" that enable the fire suppression to predetermine required resource deployment, resources to locate combustible roofs, evacuation routes, safe refuge areas, and resident assemblage locations. These planning resources help firefighting forces make critical decisions during emergency situations. Pre-Attack Plans are also made available to outside agencies who are called for Mutual Aid assistance and that may not be familiar with the area.

In addition, in 2004, the BHFD and residents within the VHFHSZ initiated the FireWise Communities/USA Program, which is designed to enable communities to achieve a high level of protection against wildland/urban interface fire loss while maintaining a sustainable ecosystem balance.

#### *Biological Resources*

The City of Beverly Hills is fully developed with urban uses and has little undisturbed open space areas. Review of GIS databases and aerial photographs indicate that there is little native terrestrial vegetation within the City of Beverly Hills. The only relatively undisturbed areas within the City include those located near the foothills of the Santa Monica Mountains and the few open space areas located in the portion of the City north of Sunset Boulevard. The remaining open space within the City is located in public parks, which typically do not contain natural or native vegetation.

Some migratory bird species pass through the City. Due to their mobility and range of travel, avian species tend to be more abundant and conspicuous than other animals. There are migratory birds that pass through the City while moving from wintering grounds in the south to breeding grounds in the north. The number of resident bird species in the City is low due to the lack of undisturbed habitat.

As discussed in the Beverly Hills General Plan Amendments Environmental Review (2009), there are no riparian or sensitive habitats that are known to occur in the City of Beverly Hills. As no riparian or sensitive habitats are known to exist within the City, biological resources do not present a constraint to future housing development within the community.<sup>22</sup>

### ***Infrastructure Constraints***

Infrastructure needed to maintain and develop new housing includes water facilities, sewer facilities, streets, and sidewalks. The provision and maintenance of these facilities in a community enhances not only the character of the neighborhoods but also serves as an incentive to homeowners to routinely maintain the condition of their homes. In contrast, when public improvements are left to deteriorate or are overextended in use, the neighborhoods in which they are located become neglected and show early signs of deterioration.

Very little undeveloped residential land remains in the City. Most of the community's infrastructure is currently in place and adequately serves existing development. Future housing growth will occur within in-fill areas and construction of multi-family or mixed development within commercial areas. Therefore, the provision of infrastructure does not constitute a constraint to housing production.<sup>23</sup>

### ***Water System***

The City of Beverly Hills provides water service to approximately three quarters of the City's residents and to some residential parts of the City of West Hollywood. The remaining areas of the City of Beverly Hills that the City does not provide water service to are served by the Los Angeles Department of Water and Power.

The City of Beverly Hills imports about 90 percent of its water from the Metropolitan Water district (MWD) to approximately 9,400 customers. The remaining 10 percent of water need is met by the four groundwater wells in the City. Three are located in the Beverly Gardens Park and one in the Burton Way median and all are pumped to the treatment plant through a transmission main owned and maintained by the City. About 90 percent of the service area land use is residential in nature. The service area includes the city

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<sup>22</sup> Beverly Hills General Plan Amendments Environmental Review (2009)

<sup>23</sup> Ibid.

limits on the west and north San Vicente Boulevard on the east and Whitworth Drive on the south.<sup>24</sup>

As described in the Urban Water Management Plan (UWMP), the current and projected water supply and demand indicates that in average precipitation years the City has sufficient water to meet its customer's needs through 2030. Beverly Hills' water supply is anticipated to meet the demand for future population growth up to 2030. As per State Law (Gov Code Sec. 65589.7), the City will give priority for service hook-ups to projects that include affordable housing.

#### *Sewer System*

The Beverly Hills Department of Public Works maintains sewer collection and distribution system within the community. The existing sanitary sewer system consists of over 95 miles of sewer mains that connect to the sewer facilities of the City of Los Angeles at the southwestern border of the City. More than half of the existing sewer system within Beverly Hills is over fifty years old. To address this issue, the City of Beverly Hills has a rehabilitation program in place to repair, reline, and/or replace the existing waste water infrastructure. All of the City's wastewater flow is treated at the City of Los Angeles Hyperion Treatment Plant located in the City of El Segundo.<sup>25</sup> As per State Law (Gov Code Sec. 65589.7), the City will give priority for service hook-ups to projects that include affordable housing.

#### *Storm Drainage*

There are approximately 47 miles of improved storm drain system within and adjacent to the boundaries of the City of Beverly Hills, approximately two-thirds of which is owned and maintained by the City. The remaining one-third is under the jurisdiction of the Los Angeles County Department of Public Works. Roughly one third of the storm drain system was built before 1940 with the earliest construction taking place in the 1920s and the most recent in the 1970s. The 1999 Storm Drain System Master Plan identified 18 percent of the City's drainage links as insufficient to convey the runoff for the 10-year or 25-year storm. However, approximately 72 percent of the deficient links require a 1-foot diameter or less upgrade to the existing pipe size.

The 2002 Water System Master Plan recommends that the City establish a program to investigate each deficiency and coordinate this replacement work with other City projects in the area within the

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<sup>24</sup> Ibid.

<sup>25</sup> City of Beverly Hills General Plan Update Technical Background Report, October 2005.

recommended timeframes for each deficiency. Ongoing inspection of city storm drains, especially the older (pre-1960) drains and those where corrugated metal pipe was used, is recommended to monitor for unusual changes in structural integrity.

### *Street System*

The City of Beverly Hills is located along the densely developed Wilshire Corridor and is regionally placed in the middle of a variety of regional traffic generators that include Westwood, the University of California, Los Angeles (UCLA), Century City, Los Angeles International Airport (LAX), and Culver City to the west and West Hollywood, the Wilshire Miracle Mile, and downtown Los Angeles to the east. There are only two major facilities that provide regional transportation service for through traffic to bypass the City of Beverly Hills: the I-405 freeway in the north-south direction and the I-10 freeway in the east-west direction. This results in the use of many of the roadways in the City being used by through traffic to get to and from the various activity centers in the area.

The City of Beverly Hills promotes walking as a viable means of transportation. Recently, upgrades in urban design and pedestrian amenities have been completed in the Business Triangle, including mid-block signalized crosswalks and widened sidewalks. The Business District also features some diagonal pedestrian intersection crossings (with an exclusive pedestrian crossing phase) and an ordinance limiting ground floor street frontage of businesses not considered to be pedestrian-friendly. The City's pedestrian facilities include sidewalks, stairs, pedestrian promenades, and paths in the City's parks.

Four separate transit agencies provide bus service in the City of Beverly Hills. The Los Angeles County Metropolitan Transportation Authority (Metro or MTA) operates the majority of the fixed-route bus transit service, with sixteen bus lines within the City. The City of Santa Monica Big Blue Bus (SM), the Antelope Valley Transit Authority (AV), and the Los Angeles Department of Transportation (LADOT) also provide limited transit routes within and through the City.

As part of the General Plan update in 2010, the City conducted an examination of existing traffic volume/capacity conditions in Beverly Hills.<sup>26</sup> According to the report, up to fourteen of the intersections thirty-five intersections analyzed were operating at LOS E or LOS F during the weekday AM peak hour. The City will be comprehensively evaluating and updating existing policies and programs to relieve traffic congestion including examining policies to

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<sup>26</sup> Ibid.

encourage transit uses, pedestrian and bicycle access and construction of infill development as it updates its mobility and bicycle master plans.

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## **HOUSING RESOURCES**

Important components of the Housing Element are identification of sites for future housing development, and evaluation of the adequacy of these sites in fulfilling the City's share of regional housing needs (RHNA). This "Housing Resources" section describes the resources available for development, rehabilitation, and preservation of housing in Beverly Hills including land available for new housing construction, financial and other resources that the City uses to facilitate housing production and housing-related services, and opportunities for energy conservation in residential development as a means of reducing housing costs.

### **Meeting the Regional Housing Needs Allocation (RHNA)**

In order to assure that housing is available throughout the State in a proportion that meets the needs of the State's population over time, the State requires every city and county to plan for the potential future development of a specified number of new housing units. The specific number of new units that each city and county must plan for is given to them by the State at the beginning of each housing element planning cycle, and is unique to each city and county. The number of new housing unit that a city or county must plan for is referred to as their "Regional Housing Needs Allocation", or "RHNA". Further explanation of the RHNA process is presented on page 9.

### **Addressing Unaccommodated RHNA from Prior Planning Period**

California State Housing Law states:

"For housing elements due on or after January 1, 2006, if a city or county in the prior planning period failed to identify or make available adequate sites to accommodate the regional housing need allocated, then the city or county shall, within the first year of the planning period of the new housing element, zone or rezone adequate sites to accommodate the unaccommodated portion of the regional housing need allocation from the prior planning period." (Housing Element Law Implementation Requirement, Government Code 65584.09(a), Chapter 614, Statutes of 2005 (AB 1233))

In Beverly Hills' previous (2001) Housing Element, the City was unable to demonstrate to the satisfaction of the State Department of Housing and Community Development (HCD) that sufficient development capacity existed within its zoning districts to accommodate the number of new housing units required under the RHNA. Under AB 1233 (2005), any jurisdiction that HCD determines to have failed identify adequate sites in their prior housing elements to make up the shortfall in their next updated Element. Any rezoning

necessary to address the shortfall in sites from the prior planning period must be completed within the first year of the new 2008-2014 housing element planning period. As presented earlier in Chart 1 and in Table 40 below, Beverly Hills has a carry-over of 117 units from the prior 2001 Housing Element (35 very low, 42 low, 40 moderate).

As detailed in the Sites Inventory section which follows, the City has developed a thorough approach to identifying those underutilized sites most suitable for redevelopment during the planning period. Through this more refined sites inventory analysis, the City is able to demonstrate sufficient site capacity zoned at appropriate densities to accommodate its carry-over RHNA of 117 units, as well as its current RHNA of 437 units.

As such, no rezoning is required to address the identified RHNA shortfall from the prior Element. Table 40 summarizes how the City has addressed its prior RHNA shortfall through: a) units constructed during the prior planning period, b) rezoning of commercial sites, and c) the updated sites inventory. The City's actions are further described in the narrative, which follows.

**Table 40 Meeting the RHNA for the Previous Cycle (1998-2005)**

	Total Units	Very Low	Low	Moderate	Above Moderate
Prior 1998-2005 RHNA	256	35	42	40	139
Previously identified sites (2001 Housing Element)	904	-	-	-	904
Sites shortfall/carryover units from prior RHNA	117	35	42	40	0
<b>A. Units constructed 1998-2005</b>	222				222
<b>B. Commercial sites Rezoned</b>	483 <sup>27</sup>			3 3 entitled	480 419 entitled 61 constructed
<b>C. Updated sites analysis</b> 1. Vacant 2. Underutilized 3. Entitled Projects 4. Second Units 5. Permits Finaled	1527	819 78 vacant 725 underutilized 16 second units		10 7 entitled (including rezoned entitled above) 3 second units	698 459 entitled (including 419 <sup>28</sup> rezoned entitled above) 1 second unit 238 constructed from 1/1/06 – 7/1/10

<sup>27</sup> Unconstructed entitled units (422 units) are included in the updated sites analysis. 350 units were entitled at greater than 30 units per acre and meet the density criteria for a lower income site. However, the city is treating these units as entitled projects with no affordability controls, and so these units have been credited towards meeting the City's above moderate income requirements.

<sup>28</sup> At the beginning of this planning cycle, the City approved three above moderate development projects that included future affordable housing Trust Fund dollars (\$4.85 million). It is the City's intent to use the Housing Trust Fund to stimulate development of affordable housing.

**A. Units Constructed 1998-2005**

As presented in the following table, a total of 222 net new units were constructed in Beverly Hills during the prior planning period.

<u>Income Category</u>	<u>New Units Finaled Gross (Net) (1/1/1998-12/31/2005)</u>	<u>Total Units Finaled Gross (Net)</u>
Above Moderate	MFR - 242 (153) SFR - 218 (69)	460 (222)

**B. Commercial Sites Rezoned**

The City rezoned 19.96 acres of commercially zoned property to residential use in the previous cycle and the beginning of the current cycle. Total new units allowable on rezoned lands was 486 (350 units were at a density greater than 30 units per acre).

The following table lists commercial lands the City rezoned. With rezoning the City negotiated agreements that provide set aside money for affordable housing. Dollar amounts are listed and will be utilized under program 10.3 "Housing Trust Fund" to create affordable housing.

<b>Project Address</b>	<b>General Plan Designation</b>	<b>Permitted Units</b>	<b>Acres</b>	<b>Allowable Unit Density</b>
8600 Wilshire	Mixed Use 2	23	.60	39 units/ac
9200 Wilshire	Mixed Use	54	1.0	54 units/ac
9876 Wilshire <sup>^</sup>	Beverly Hilton Specific Plan	110	8.88	12 units/ac
9900 Wilshire	9900 Specific Plan	235	7.62	31 units/ac
402 Beverly <sup>^</sup>	Beverly Hills Gardens Specific Plan	25* (constructed)	1.47	17 units/ac
8601 Wilshire	Commercial	36* (constructed)	.39	93 units/ac
<b>Total</b>		<b>483</b>	<b>19.96</b>	

\* Not included in the City's potential sites inventory (Table 41) since already constructed

<sup>^</sup> Mixed use site: Condominiums, hotel, office, retail shops, restaurants, public park

**C. Updated Sites Analysis**

A more thorough detail of potential housing sites is presented in this Housing Element Update and indicates that, using a conservative

approach<sup>29</sup>, an additional 725 units could reasonably be developed in the City's R-4 residential districts during the planning cycle. The outcome that 725 additional units could reasonably be constructed in the City's R-4 district is a result of existing General Plan land use and zoning that was in effect during the prior cycle. The sites inventory analysis presented in the following section details the City's methodology used to demonstrate site suitability and redevelopment potential.

### Sites Inventory

The City has revised its housing sites inventory. The revised survey is provided at the end of the document and replaces the City's initial potential sites inventory. The City's original sites inventory took into consideration all parcels which had a potential for redevelopment during the planning cycle (2006-2013). Based on review of past development trends, the City feels that single-lot, and multiple-lot housing projects are common enough to consider both in the housing inventory. However, doing so would not address the State's concern that the City's housing sites inventory did not include project sites at a density sufficient enough to support affordable housing projects. The State indicated that "assisted housing developments utilizing State or federal financial resources typically include 50-80 units" in a letter dated January 21, 2011.

To address the State's concern that adequate large sites for housing exist in the City, the housing inventory was revised to:

#### Housing Sites Inventory

- Identify only sites with two or more parcels.
- Calculate residential unit density as 85-percent of allowable zoning density based on the number of parcels that can be assembled (the initial inventory calculated densities only at the lower zoning density for single lot redevelopment).
- Identify existing uses on each site (only properties with four or fewer units existing onsite were considered).
- Visually display properties that can be assembled.

Based on the revised housing sites inventory, and assuming 85% build out of zoning code density with no additional unit density incentive for building senior or congregate housing, four project sites are available for residential projects meeting the State's criteria of

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<sup>29</sup> Estimated at 85% of zoning density build-out, only including lots that could be assembled, where fewer than four units currently exist on each lot, and buildings were constructed more than 45 years ago and are maintained in average to poor condition. A more detailed summary of the potential sites inventory is presented later.

having a potential for more than 50 units. When unit densities are calculated utilizing the incentive for providing senior housing (150 units/acre), the number of potential sites meeting the State’s criteria is more than 45.

\_\_\_\_\_The following section presents a summary discussion, charts, and maps of the City’s housing sites inventory, tables included in the Appendix to the Element list out all parcels included in the inventory. As described in the prior section, Beverly Hills is including the unmet RHNA from the prior cycle with this cycle’s RHNA numbers and so is considering this cycle’s RHNA allocation to be 554 units distributed among the following income groups: 146 very low income; 113 low income; 117 moderate income; and 178 above moderate income.

\_\_\_\_\_Beverly Hills is a built-out City located in an urbanized metropolitan region, with very little land remaining that has not been developed in some form. Housing growth is primarily accommodated through the recycling of underutilized properties. Therefore, the inventory of potential new housing sites considers the redevelopment potential of existing multi-family properties, as well as vacant multi-family lands. Recent development trends suggest that, on average, multi-family projects in the City are built to at least 85% of the permitted General Plan density (refer to Table 31 for project examples). Therefore, in order to assess realistic development potential, identified sites have been assumed to develop at 85% of the maximum General Plan density.

\_\_\_\_\_Table 41 presents the City’s aggregate residential sites inventory (see further discussion of sites inventory and appendix for list of properties):

<u>Vacant multi-family (R-4) sites (&gt;30 units/ac)</u>	<u>78 units</u>
<u>Underutilized<sup>30</sup> multi-family (R-4) sites (&gt;30 units/ac)</u>	<u>725 units</u>
<u>Entitled Housing Projects (with affordable units, or money)</u>	<u>466 units</u>
<u>Second units in single-family districts</u>	<u>20 units</u>
<u>New<sup>31</sup> residential development projects finalized during the RHNA “gap period” (January 2006 - July 2010)</u>	<u>238 units</u>
<u>Total Unit Capacity</u>	<u>1,527units</u>

<sup>30</sup> The potential sites inventory was revised in response to comments from the State. The methodology use in the analysis is presented in Appendix A and a discussion of the inventory is provided in this section.

<sup>31</sup> Units built during the “gap” period are discussed further on in this section.

**Vacant Multi-Family (R-4) Sites (>30 units/ac)**

Utilizing Geographic Information Systems (GIS) and assessor parcel data, and confirmed by site inspections, the City identified a total of 6 vacant R-4 zoned sites (15 lots), providing capacity for 78 new multi-family units, as illustrated in Table 42 below, and Table 57 in Appendix A.

Table Vacant Multi-Family Residential (R-4) Properties <sup>6</sup>				
General Plan Designation	Allowable Unit Density	Vacant Sites (lots)	Vacant Acreage	Realistic Unit Potential*
High Density	50 units/ac	1 (8)	0.70	30
Medium Density	45 units/ac	1 (2)	.58	20
Low-Medium Density	40 units/ac	2 (2)	.31	11
Low Density	40 units/ac	1 (1)	.45	17
<b>Totals</b>		<b>15</b>	<b>2.04</b>	<b>78</b>

*\*Unit potential based on past development trend of 85% zoning code density*

**Underutilized Multi-family (R-4) Sites (>30 units/ac)**

Multi-family parcels were considered “underdeveloped” with a realistic potential for redevelopment during the 2008-2014 Housing Element planning period if all of the following could be met:

- Zoned R-4 (Multi-Family Residential)
- Permitted density of at least 30 units per acre
- Developed currently with apartments, single-family, or duplexes (condominiums eliminated)
- No more than 4 units existing on any single property
- Must consist of at least 2 adjacent properties (Table 31 includes recent multi-lot projects that have recently been built in the City)
- Building(s) constructed at least 40 years ago
- Building(s) in moderate condition or less (based on visual inspection)
- Current number of dwelling units on each site at least 4 units fewer than permitted under 85% of zoning code density.

As presented in Table 43 below, 284 R-4 parcels meet the City’s criteria of underdeveloped and suitable for intensification within the Housing Element planning period. Utilizing the 85% zoning density threshold and factoring in the specific site development standards for each parcel (refer to tables 28, 29, and 30); a total of 725 net new units could be built on underutilized parcels in the R-4 zone districts. The table on the following page presents the results of the underutilized sites inventory, the full inventory is presented at the end of this document in Appendix A.

<b>Table Underutilized Multi-family Residential (R-4) Properties</b>				
<b>General Plan Designation</b>	<b>Allowable General Plan Unit Density</b>	<b>Underutilized Sites (lots)</b>	<b>Underutilized Acres</b>	<b>Realistic Unit Potential' (Net New)</b>
High Density	50 units/ac	98	14.2	285
Medium Density	45 units/ac	75	10.2	193
Medium-Low Density	40 units/ac	94	13.6	203
Low Density	40 units/ac	17	2.5	44
<b>Totals</b>		<b>284</b>	<b>40.5</b>	<b>725<sup>^</sup></b>

<sup>†</sup> Net Unit potential based on past development trend of 85% General Plan density

<sup>^</sup> Net Building Potential at 85% zoning code density

Although many of the sites identified in the City's potential sites inventory are small (<.5 acres), as shown in Table 31, redevelopment in the City occurs on small sites, either as single lot projects or as multiple lot projects. The City provides incentives for lot aggregation in the R-4 development standards, namely greater unit density for projects occurring on multiple lots.

Although the City sees development on single lots, for the sake of using a conservative measure of redevelopment potential, the City only considered potential redevelopment of underutilized sites that consisted of two or more parcels. Single parcels, although viable for redevelopment, were not considered.

### **Entitled Housing Projects**

Since 2006, City has approved six projects that have either included affordable housing units or will provide monies for the City's future Housing Trust Fund. Five of those projects (9.2 acres) were approved at a residential density of greater than 30 units per acre (see table below). These projects are summarized in the text and table below.

Development agreements on two of the projects (9876 Wilshire Blvd., and 9900 Wilshire Blvd.) include funds for affordable housing totaling \$4.5 Million. Neither project has been submitted for building permits, but when they are, this money will be deposited in the City's - to be created - Housing Trust Fund (Imp. 10.3). An additional specific plan project (9200 Wilshire Blvd.) has been approved that includes \$3.25 million for public benefit. Although this money is not specifically allocated to affordable housing, it is anticipated that approximately 10% of the money will be deposited in the Housing Trust Fund (Affordable Housing monies included in the 9900 Wilshire project is equal to 10% of public benefit monies for that project).

The City has successfully incorporated affordable units within three recent market rate projects. One of the approved projects (8600 Wilshire Blvd.) is a residential/commercial project. The other two projects are residential R-4 projects that have utilized the City’s Density Bonus Ordinance. Affordable housing provided by these projects is summarized in the following table (Table 44).

<u>Project Address</u>	<u>General Plan Designation</u>	<u>Permitted Units</u>	<u>Acres</u>	<u>Allowable Unit Density</u>	<u>Affordability Component</u>
9936 Durant	MFR High Density	14	0.28	50 units/ac*	2 Moderate
309-325 S. Elm	MFR High Density	30	0.70	43 units/ac*	3 Low
8600 Wilshire	Mixed Use 2	23	0.60	39 units/ac	2 Moderate
9200 Wilshire	Mixed Use	54	1.00	54 units/ac	\$350K
9876 Wilshire	Beverly Hilton Specific Plan	110	8.88	12 units/ac^	\$1.5 Mil.
9900 Wilshire	9900 Specific Plan	235	7.62	31 units/ac	\$3 Mil.
<b>Total</b>		<b>466</b>	<b>19.08</b>	<b>Affordable Housing Dollars \$4.85Mil.</b>	

\* These projects utilized State density bonus incentives (SB 1818)

### **Second Units**

In addition to the potential sites identified in the housing sites inventory, there is a capacity to provide second units in many of the City’s single-family residential districts. Second units, also known as guest houses, pool houses, and granny flats, are small dwelling units that provide a kitchen, bathroom and sleeping area. Second units can be part of the main home, or can be a small building in the backyard.

Second units can provide affordable rental options for smaller households, such as caregivers or the elderly parents of the primary homeowner, and offer an important opportunity to help Beverly Hills address its regional housing needs. The City has adopted a ministerial approval process for second units less than 650 square feet in size, and allows larger second units, including units above garages, on R-1 properties located north of Santa Monica Boulevard subject to a second unit permit.

In order to collect information on second units, in June 2010 the City mailed a second unit survey to all single-family property owners in Beverly Hills (survey provided in the appendix). This mailing served to obtain information on the extent of second units in the City, their affordability and the populations they serve, and served the dual purpose of informing residents that second units are both legal and encouraged in Beverly Hills. The survey began with a clear definition of what qualifies as a bona fide second dwelling unit, and requested homeowners with a second unit on their property that

met this definition to complete the survey. A comment section was provided for property owners to share any thoughts they had on second units, regardless of whether they currently had a second unit or not. The following section summarizes the results of the survey.

The City received 183 surveys back from the public. Of the returned surveys, 110 respondents indicated they had a second unit on their property, whereas the other 73 respondents did not currently have a second unit but included written comments for the City. The vast majority of the 110 second units captured by the survey were detached (87%). Forty-two of the second units surveyed (38%) were currently occupied, indicating that many units are not being used for full time occupancy, but may be made available for visiting guests or function as a pool house.

**Table 45 Second Units Surveyed**

Surveys Returned	184
Surveys with 2nd Units	111
Unit Currently Occupied	43
<i>Offered Rent Free</i>	<i>31 (72%)</i>
<i>Units Occupants Related to Homeowner</i>	<i>19 (33%)</i>
Number of Occupants	56
<i>Occupant is a Caregiver</i>	<i>21 (38%)</i>

The 42 occupied second units in the survey housed a total of 54 residents. While most units had a single occupant, one-quarter of the units had two or three occupants. Nearly half the occupants were related to the primary homeowner (44%), and a majority were over the age of 55 (42%), indicative of the role second units play in providing housing for aging parents. Approximately one-third of second unit occupants were working age adults between the ages of 31-55 years old.

**Table 46 People Living in Surveyed Second Units - Demographics**

Number of People living in 43 Occupied 2nd Units Surveyed	55
Occupant Related to Homeowner	45%
Occupant Over 55	48%
Occupant 31-55	33%
Occupant 16-30	19%

By occupation, most occupants were caretakers (37%), illustrating another role second units play in Beverly Hills. Over-one

quarter of occupants were identified as professionals, followed by students and retirees.

**Table 47 People Living in Surveyed Second Units - Occupation**

Caretaker	38%
Professional	26%
Student	14%
Retired	12%
Other	10%

An additional question posed in the survey asked if rent was charged on currently occupied second units and if so, the amount of rent. A series of rental ranges were provided from which to choose, with ranges selected that generally correspond to the level of rent considered affordable to very low, low, moderate and above moderate-income households. This question was posed to assess the affordability of existing second units, and to estimate the proportion of new second units that may contribute towards addressing the community's regional housing needs (RHNA).

As indicated in the following table, 81 percent of occupied second units were provided rent free or for a rental amount affordable to very low income households. Another 3 percent of second units rented at levels affordable to low income households, and 12 percent at levels affordable to moderate income households. The survey also asked the age of the second unit to assess whether newer units tended to command higher rents; of the 4 units built 2006 or later, all were provided rent free to either family members or caretakers.

**Table 48 Surveyed Second Units - Rent Ranges**

Income Category	Rental Range	Percentage of Occupied 2 <sup>nd</sup> Units
Very Low	No Rent or Rent < \$400	81%
Low	\$401-\$700	3%
Moderate	\$701-\$1,100	12%
Above Moderate	Over \$1,100	4%

The City has received and approved an average of 3 discretionary second unit applications annually since the current ordinance was adopted in 2003, and is in the process of identifying building permits for second units less than 650 feet in size not required to undergo discretionary review. Projecting a slight increase in the

rate of second unit construction based on the proposed ordinance modifications and program publicity, the City estimates that approximately 5 new second units will be created annually, for a total of 20 new second units during the 2011-2014 period.

Based on the results of the City's second unit survey, it is estimated that 81%, or 16, of the total second units requiring discretionary approval that may be approved in the planning cycle, will be offered at a nominal rent or rent free and therefore count towards meeting the "very low" income RHNA housing requirement. Further information will be provided on second units that do not require discretionary approval when that information is available. To further encourage the provision of second units, the Housing Element includes a program (Imp 10.4) for the City to evaluate certain modifications to its second unit ordinance, followed by a brochure to disseminate information on the City's second unit standards. Ordinance revisions to be evaluated include:

- Greater flexibility in second unit standards in R-1 zones south of Santa Monica Boulevard.
- Allowing larger sized second units of up to 1,000 square feet by right, thereby eliminating the need for a second unit permit and reducing processing times.
- For second units built above a garage, allowing an increase in the permitted height up to the height of the primary residence.
- Allowing reduced setback requirements where privacy is not compromised.

It is anticipated that modifying the City's existing second unit ordinance will lead to additional second units being constructed during the current planning period.

**Residential Development Completed During the RHNA "Gap Period"  
(January 2006 - July 2010)**

The following table details multi-family projects completed during the initial part of the current Housing Element Cycle. Units demolished are also included in the table. Properties where units were demolished are not necessarily the same properties where units were constructed because this list only included finished projects. Sites where units were demolished that are not also listed as having new units are currently under construction.

**Table 49 Multi-Family & Second Unit Permits  
Finaled Between January 1, 2006 - July 1, 2010**

<u>Unit Type</u>	<u>Number of Units</u>
<u>Apartments</u>	
<i>8601 Wilshire (39 units)</i>	
<i>155 N Crescent (88 units)</i>	
<i>9355 Wilshire (12 units)</i>	
<i>320 N Oakhurst (33 units)</i>	
<i>115 N Swall (3 units)</i>	
	<u>175</u>
<u>Condominiums (new and converted)</u>	
<i>402 Beverly Drive (25 units)</i>	
<i>558 Hillgreen (9 units)</i>	
<i>140 S Oakhurst (11 units)</i>	
<i>437 N Palm (13 units)</i>	
<i>261 Reeves (23 units)</i>	
<i>133 Spalding (4 units)</i>	
<i>170 N Arnaz (5 units)</i>	
<i>136 S Camden (3 units)</i>	
<i>148 Peck (7 units)</i>	
<i>309 S Rexford (4 units)</i>	
	<u>104</u>
<u>Garage Bonus Units</u>	
<i>458 S Palm (2 units)</i>	
<i>309 S Rexford (1 unit)</i>	
<i>430 Smithwood (1 unit)</i>	
	<u>4</u>
<u>Second Units<sup>32</sup></u>	<u>25</u>
<u>Demolitions</u>	
<i>320 N Oakhurst (-8 units)</i>	
<i>322 N Oakhurst (-8 units)</i>	
<i>450 N Palm (-12 units)</i>	
<i>454 N Palm (-8 units)</i>	
<i>458 N Palm (-10 units)</i>	
<i>115 N Swall (-2 units)</i>	
	<u>-48</u>
<u>Apartments Lost (due to conversion)</u>	
<i>170 N Arnaz (-6 units)</i>	
<i>136 S Camden (-4 units)</i>	
<i>148 Peck (-8 units)</i>	
<i>309 S Rexford (-4 units)</i>	
	<u>-22</u>
<u>Total New Units Constructed</u>	<u>238 (net)</u>

In addition to the units built during the planning cycle, an 88-unit congregate care facility was constructed:

**Table 50 Senior Congregate Units Finaled  
Between January 1, 2006 - July 1, 2010**

<u>Senior Assisted Living (Congregate Care)</u>	<u>88 (net)</u>
<i>201 N Crescent (88 units)</i>	

<sup>32</sup> Represents finished second units that required a Second Unit Use Permit. Additional second units were constructed during this period under the City's by-right allowance for units 650 square feet and smaller.

### Current RHNA Requirement

Although the City believes there is evidence that suggests that it had the capacity needed to meet the number of units required in the past RHNA, and that through rezoning the City provided an additional 483 units and received guarantees for \$4.85 million dollars to be used to build affordable housing, the City is including the unmet RHNA from the prior cycle with this cycle's RHNA numbers. With the unmet need added to the current cycle's RHNA, the City needs to demonstrate the opportunity to develop an additional 554 units distributed among the following income groups: 146 very low income; 113 low income; 117 moderate income; and 178 above moderate income.

Housing Element statutes now provide for use of "default densities" to assess affordability while evaluating the adequacy of sites to address the affordability targets established by the RHNA. Based on its population, Beverly Hills falls within the default density of 30 units/acre for providing sites affordable to very low-, and low-income households. For moderate income households, the City has chosen a threshold of 15 units/acre to reflect a reasonable density with which moderate income development can be achieved. Allocating Beverly Hills' residential sites inventory based on these density thresholds, combined with affordable units with entitlements and the affordability mix in anticipated second units, results in a sufficient unit capacity to address the City's very low, low and moderate income needs.

The City is in the process of developing an affordable housing policy. As proposed in the Housing Element, this policy includes an inclusionary housing requirement, as well as an option to contribute fees in-lieu (Imp. 10.2), to an affordable Housing Trust Fund (Imp. 10.3). While the inclusionary housing program is being developed, the City has negotiated development agreements on three projects to require contributions of more than \$4.5 million to the Housing Trust Fund (Program 10.3)

Table 42 on the next page compares Beverly Hills' RHNA for 554 new units with the City's aggregate residential sites inventory numbers.

Table Comparison of Regional Housing Growth Need and Residential Sites						
Income Category	State's Min. Density Guidelines	Building Permits Finaled (1/2006-/2010)	Entitled Projects & Specific Plans <sup>33</sup> (Pending Building Permits)	Vacant and Underutilized R-4 Units (Net, 85% GP Density)	Anticipated Second Units	Total RHNA
Very Low	>30 units/acre	20	3	791	16	146
Low						113
Moderate	> 15 units/acre	4	4		3	117
Above Moderate	< 15 units/acre	214	459		1	178
<b>Totals</b>		<b>238</b>	<b>466<sup>34</sup></b>	<b>791</b>	<b>20</b>	<b>554</b>

Based on a review of the results of the sites inventory the City feels that there are adequate sites in the City to fulfill its regional needs by income category. The city will further encourage and facilitate production of affordable units on these sites through regulatory incentives and direct financial assistance through the Affordable Housing Trust Fund as well as institute the programs presented further in this document.

### **Availability of Public Services and Facilities**

Beverly Hills is an urbanized community with a comprehensive system of public facilities. All areas of the City are served by streets, sewer and water, storm drains, and gas and electrical infrastructure, with maintenance and periodic upgrades provides as needed. The existing infrastructure and service systems are sufficient to accommodate the additional housing development anticipated to occur during this Planning period.

### **Financial Resources**

A limited number of financial resources are available to assist the City in providing support for the production, preservation, improvement, and maintenance of affordable housing. The financial resources currently available or proposed to be available based upon the implementation of new programs during this Housing Element planning period, for distribution to property owners,

<sup>33</sup> Entitled specific plans pending building permits include 9900 Wilshire (235), 9876 Wilshire (110), 9200 Wilshire (54), 8600 Wilshire (23/ 2 moderate), and Elm Dr (25/ 3 Very Low).

<sup>34</sup> These are entitled specific plan only. The entitled sites inventory includes these projects and all other entitled multi-family residential projects current to July 1, 2010

homeowners, developers, social service agencies, landlords, or tenants have been summarized below:

***Community Development Block Grant (CDBG)***

Through the CDBG program, the federal Department of Housing and Urban Development (HUD) provides funds to local governments to fund a wide range of housing and community development activities for low-income persons. The CDBG program provides formula funding to larger cities and counties, while smaller cities (less than 50,000 in population) generally compete for funding that is administered by the County. Each year, Beverly Hills receives approximately \$260,000 in CDBG funds through the Los Angeles County Community Development Commission.

***Community Assistance Grant Funding (CAGF)***

Through its annual Community Services Assistance Grant Funding application, the City allocates General Fund monies to a variety of service organizations that support the City's commitment to the provision of a social service safety net for the most vulnerable members of the community. In 2010/11, City Council allocated approximately \$275,000 in CAGF funds, with \$300,000 allocated in 2009/10 and \$470,000 allocated in 2008/09.

The City utilizes its annual CDBG and CAGF allocations to fund a variety of agencies and services, including:

- The Senior Case Management Program operated by Jewish Family Services
- A Handyworker Program for lower income tenants and homeowners
- CLASP (Changing Lives and Sharing Places) Homeless Outreach Team
- Emergency housing offered through PATH (People Helping the Homeless)
- All Saints Homeless Assistance Program
- The Westside Food Bank
- The Los Angeles Free Clinic
- The Maple Mental Health Counseling Center

The City has also utilized these funds to support in the development of emergency housing, including New Directions' Regional Center for Homeless Veterans, Path's Regional Homeless Center, and Upward Bound House's Family Shelter, which opened its doors in 2010.

***Section 202***

The City has one assisted senior housing project financed under the HUD Section 202 program. This project has 150 units for disabled and

senior residents (Table H 23 (Assisted Housing Inventory)). The project was developed in 1988 and has a 40 year affordability covenant. It is owned and operated by the Menorah Housing Foundation, a nonsectarian, nonprofit 501(c)(3) corporation that develops and manages affordable independent-living senior apartment units throughout Los Angeles. Residents must be 62 years of age or older and must earn 50 percent or less of the area median income. Discussion with the Menorah Housing Foundation indicates that there is a need for senior housing in community and there is currently a long wait list for the project.

### ***Section 8 Rental payment Assistance***

The Housing Authority of the County of Los Angeles administers the Section 8 Housing Choice Voucher Program for sixty-one jurisdictions throughout the county including the City of Beverly Hills. The Section 8 program provides rent subsidies to lower-income households (earning 80 percent or less than the county's area median income) in the form of vouchers. Within Beverly Hills, three households receive Section 8 vouchers. Of these households, two are senior residents and one is a family household.

### **Additional Resources Available to the City**

Other potential resources available to the City include grants and other competitive federal, state, and local programs. A summary list of these programs are presented below and will be considered as potential funding resources, as appropriate, independently, or in conjunction with housing developers to leverage City and private funds in support of the production of affordable housing.

#### ***Federal Programs and Funding Sources***

- Section 202/Section 822 Housing for Seniors and Disabled Persons
- Housing Opportunities for Persons with AIDS
- Supportive Housing Program
- Federal Emergency Shelter Grants
- Shelter Plus Care
- Home Ownership for People Everywhere (HOPE I, HOPE II, and HOPE III)
- Section 108 Program
- State Programs and Funding Sources
- Low-Income Housing Tax Credits
- California Housing Finance Agency
- Multi-Family Rental Housing Mortgage Program
- Building Equity and Growth in Neighborhoods (BEGIN)
- Workforce Housing Reward Program (WFH)
- Infill Incentive Grant Program

- Transit-Oriented Development Program
- Multi-Family Housing Program
- Local Programs and Funding Sources
- Los Angeles County Mortgage Certificate Program

### **Potential Resources Offered by the City**

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In addition to funding that provides financial assistance for the production, maintenance, preservation, or rehabilitation of affordable housing, the City offers a range of other programs and incentives to promote affordable housing conservation and production. The programs summarized below are a combination of existing and new incentives that are described in further detail in "Housing Plan" section.

#### ***Rent Control/Stabilization***

The City of Beverly Hills enforces two rent control ordinances (Title 4, Chapter 5, and Chapter 6, Beverly Hills Municipal Code). All apartment units and duplexes in the City are subject to and fall under one of the two existing regulations. Tenants who, at any time during their tenancy, paid \$600 or less per month are subject to Chapter 5 regulations. Tenants who paid \$600 or more per month at move-in are subject to Chapter 6 regulations.

#### ***Housing Trust Fund***

Since the City does not have a Redevelopment Agency and has limited access to federal resources for housing development, the City has faced financial constraints in the ability to facilitate the construction of affordable housing. To create a more viable funding source, the City will create a Housing Trust Fund that will be used to construct or help leverage housing construction for seniors and the workforce. Possible financial streams include in-lieu fees from the City's Inclusionary Housing Program, hotel taxes, increase to real estate transfer fees, and/or the creation of a commercial linkage fees program.

#### ***Inclusionary Housing Program***

A major focus of Beverly Hills' Housing Element is to adequately provide a balance inventory of housing types, styles, and prices to allow the City to meet the housing needs of all residents in the community. In addition, providing financial and regulatory assistance will be essential to facilitate the production of housing not provided through the private market. This new program will be designed to require a proportion of affordable housing in new residential developments or levy an in-lieu fee. The program goal over the 2008–2014 planning period is for an average of 15 percent of all new housing units to be affordable to very low-, low-, and

moderate-income households. The City will either (a) require the payment of an in-lieu fee or (b) require provision of affordable housing on-site. As an initial step, the City will retain a consultant to determine the appropriate levels of in-lieu fees and to assist in drafting the inclusionary requirements. It is anticipated that the Inclusionary Housing program will be implemented through the development of an Affordable Housing Ordinance.

1. Projects of 25 or fewer units would have the option of preparing a paying the in-lieu fee or providing the housing on site.
2. Projects where more than 25 units are proposed would be required to provide affordable housing on site.

### ***Density Bonus Ordinance***

On September 16, 2005, the City's revised Density Bonus Ordinance, 05-O-2482, became effective. The ordinance is in compliance with state legislation. To further facilitate housing within the community, the City will revise the Density Bonus Ordinance to include other incentives such as:

Allowing reduction in parking standards for units reserved for the elderly

Providing additional incentives for set-aside units of three bedrooms to increase the supply of affordable units large enough for families

Revising zoning standards to permit replacement of free-standing garages of existing multifamily residential structures with garages with one or more additional dwelling units on the second story

### ***Condominium Conversion Incentives***

The City will continue to monitor the conversion or demolition of apartment units subject to Ordinance 82-O-1839, which limits the rate at which apartment units may be demolished or converted to condominium units. In addition, the City will revise this ordinance to require the preservation of some of the existing rental units as affordable unit or the payment of an in-lieu fee for any condominium conversion or demolition of apartment units.

### ***Senior, and Workforce Housing***

Providing adequate and affordable housing for senior residents and the local workforce is an important goal for the City of Beverly Hills. As the City's senior population ages, the City will begin to experience an increase in the demand for senior needs and services. The high costs of rental housing in the City coupled with low vacancy rates has increased the need for adequate rental housing particularly for adequate rental housing affordable to the local

workforce. Workforce occupations which may be precluded from residing in Beverly Hills due to high housing costs include teachers, emergency personnel such as firefighters and police officers, nurses and many City employees.

As a means of facilitating senior and workforce housing development within the community, the City will explore incentives appropriate to the project. The following are among the types of incentives that may be provided:

- Flexible development standards (reduced parking requirements, modified setbacks, etc)
- Density bonuses
- City support in affordable housing funding applications
- Reduction in development fees

#### ***Revised Minimum Unit Size***

Currently the City's Zoning Code requires minimum individual dwelling unit sizes for multi-family housing as follows:

- Studio: 600 square feet
- One Bedroom: 1,000 square feet
- Two Bedrooms: 1,300 square feet
- Three or more Bedrooms: 1,500 square feet

These standards are reduced for senior and disabled housing. However, these standards may be a constraint for interested housing developers that want to develop a product that is more affordable than high-end housing, particular for one-bedroom units. The City will amend the Zoning Code to reduce the minimum individual dwelling unit sizes for affordable multi-family housing in the community.

#### ***Streamlined Development Review and Waiver of Fees for Developments with Affordable Housing Units***

As a tool to be used alone or in conjunction with other incentives and programs that facilitate affordable unit production, the City will expedite the review process for proposed affordable housing developments.

As a tool that may be used in conjunction with other incentives to facilitate affordable housing production, the City will establish a program, in accordance with state law, for waiver of planning fees, and modification of development standards, (e.g., setbacks, lot coverage, etc.) at the discretion of City Council and Planning Commission for developments containing very low, low- and moderate-income housing.

### **Energy Conservation Programs**

As energy costs rise, increasing utility costs reduce the affordability of housing. Further, the potential environmental, economic, and public health benefits of achieving greater energy efficiency and the increased use of cleaner energy sources present significant opportunities for the City to promote sustainability and to reduce housing construction and operation costs.

Greenhouse gases are components of the atmosphere that contribute to the greenhouse effect. The natural greenhouse effect allows the earth to remain warm and sustain life. Greenhouse gases trap the sun's heat in the atmosphere, like a blanket, and influence the climate. Examples of greenhouse gases include carbon dioxide, methane, nitrous oxide, and fluorinated gasses. The increased consumption of fossil fuels (wood, coal, gasoline, etc.) has substantially increased atmospheric levels of greenhouse gases. ~~New housing development may contribute to greenhouse gas emissions, but careful site planning and design, and the selection of environmentally friendly building materials and equipment can significantly reduce these emission levels.~~ On September 27, 2006, AB 32 was adopted requiring the California Air Resources Board (ARB) to monitor and reduce greenhouse gas emissions. In 2009 the City adopted a sustainability plan that includes programs for reducing air emissions. The sustainable city plan also lists out helpful tips that the reader can follow to achieve greater energy efficiency in day to day activities. The City also participates in, and disseminates information on, State and local energy provider rebates and other energy conservation programs for weatherizing and improving energy efficiency in existing homes. In addition, the City amended the 2010 State Building Code (CALGreen) to include a mandatory, and two voluntary tiers of greater energy efficiency. Requirements included in the amendments are summarized in the following section and listed on the City's website.

### **Green Building Program**

In 2010 the City adopted the State's green building program (CALGreen). In adopting the program, the City amended the requirements so that green-building programs the City had adopted prior to the State's program could continue through in the CALGreen program. The result is the City's amended CALGreen building code includes additional mandatory measures in new residential projects. The table on the next page summarizes the City's amendments to CALGreen.

**Table 52- City of Beverly Hills Adopted Amendments to the State of California 2010 Building Codes for Green Building (CALGreen)**

Mandatory	Tier 1	Tier 2
	Building plans must include a summary of all green elements incorporated	
New buildings to be electric vehicle ready. Apartment buildings exempt		
Exceed California Energy Code Requirements by 15%		Exceed California Energy Code Requirements by 30%
Install photovoltaic system in compliance with the California Energy Commission New Solar Homes Partnership (NSHP)		
	Exceed energy efficiency standards by 15%	Exceed energy efficiency standards by 30%
Pipes installed to allow future grey-water system		

The tiered approach amended into CALGreen was similar in structure and requirements to the City's pre-existing green building codes. As amended, the City's administered CALGreen building code requires greater building efficiencies and therefore results in greater cost savings to occupants. Tier 1 and Tier 2 are voluntary measures that a developer can install to achieve greater energy efficiency. Mandatory measures represent those measures that every project must meet. Amendments to the mandatory measures that the City adopted are presented in the chart above. The amendments made by the City to the mandatory measures are intended to continue energy and water efficiencies, and natural areas conservation programs the City has in place forward in the CALGreen building code. The City expects that compliance with the amendments to the mandatory measures could result in up to a 3-percent increase in development costs, but would represent less than 1-percent of a unit's selling price.

The following paragraph provides background on the City's pre-existing green building programs. In May 2008, the Beverly Hills City Council approved an ordinance establishing a green building program which incorporates aggressive environmental building techniques into the design, construction, and maintenance of all new commercial, multi-family residential and mixed-use buildings in the City. The new requirements were effective from July 7, 2008 to February 11, 2011. The intent of the ordinance was to increase the energy efficiency of buildings, encourage resource conservation, reduce waste generated by construction projects, and promote the health and productivity of residents, workers, and visitors to Beverly Hills. The ordinance creates a series of requirements for developers similar to the green building measures outlined in the US Green

Building Council's LEED program (Leadership in Energy & Environmental Design). Although green buildings tend to produce more cost initially for construction, over time, the long-term cost of the buildings is less than traditional buildings due to lower utility and operational costs. In addition, the ordinance provided for hardship and infeasibility exemptions, as well as a specific exemption for affordable housing projects where full compliance with the green building standards would frustrate the ability to provide affordable units. This ordinance was removed from the City's zoning code in 2011 and was replaced by the State's mandatory green building program (CalGreen).

### **Sustainable City Plan**

Beverly Hills has adopted a number of innovative measures to address environmental sustainability including water conservation programs, environmentally friendly procurement policies, and a waste recycling program that accepts food waste. In February 2009, the City adopted a Sustainable City Plan which builds upon this foundation. The purpose of this Plan is to provide a comprehensive approach to reducing Beverly Hills' carbon footprint by providing a framework for the City to model sustainable practices for the environment, the economy, and social equity. The Plan establishes guiding principles, goals, objectives and policies which address the following topic areas:

- Community Participation & Civic Duty
- Climate Protection & Air Quality
- Energy
- Water
- Land-use, Transportation & Open Space
- Materials & Waste
- Environmental & Public Health
- Sustainable local Economy
- Social Equity

The Sustainable City Plan provides an implementation framework along with a means of prioritizing the order in which policies and programs should be advanced in order to meet the goals. The Plan identifies the following next steps upon its adoption:

- Development of an implementation and monitoring program
- Compilation of baseline information on City operations
- Standardization of reporting
- Identification of measures
- Modification of city activities, operations and programs
- Initiation of new activities, operations and programs
- Monitoring, periodically reporting and modifying City activities, operations and programs

As a landowner, employer, building manager, fleet operator, consumer, and service provider, the City has both the opportunity and the capacity to bring about significant improvements in environmental quality. By integrating environmentally sustainable practices into City policies, procedures, operations, and fostering collaboration across City government, the Sustainable City Plan will work to protect and enhance the quality of life for present and future generations in the City of Beverly Hills. Leading by example, the Plan is designed to promote responsible management and effective stewardship of the City's built and natural environments; transforming the City into a model government agency that is clean, healthy, resource-efficient, and environmentally conscientious.

Additionally, by calling for future improvements to City infrastructure, and new development projects to be designed for pedestrian and non-motorized mobility, implementation of the sustainable city plan will result in a street-level aesthetic that is walkable, with goods and services necessary to daily living available a short distance from new housing. Ultimately, these infrastructure and site design changes will result in less reliance on automobiles and greater cost savings to the future occupants. Therefore, for the above reasons, the Sustainable City Plan is not considered a constraint.

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## **REVIEW OF PAST ACCOMPLISHMENTS (1998-2006)**

An important step in developing future housing strategies that meet the needs of residents is an evaluation of the success of the prior housing element in addressing identified needs. State law requires Housing Elements to be updated at least every five years and report on the progress in meeting the goals, policies, and objectives set forth in the prior Housing Element. The Element must review the progress made in implementation of the adopted housing programs, and evaluate the effectiveness and continued appropriateness of these identified housing programs.

The City's prior Housing Element was adopted in 2001. In reviewing and updating the Housing Element, HCD requires jurisdictions to report on progress made in implementing programs since the last Housing Element was adopted. Therefore, information presented in this "Review of Housing Element Past Performance" section reports on the City's progress on housing programs from 2000 to 2005. However, HCD requires that an assessment on housing production should be reported since the last Regional Housing Needs Assessment (RHNA) cycle. Therefore, the assessment of progress towards housing production and rehabilitation goals is reported from 1998 to 2005.

The following section evaluates the City's progress in producing housing since 1998 and in implementing the programs set forth in the 2000-2005 Housing Element update.

### ***Housing Production: RHNA Accomplishments for 1998-2005 Housing Element***

The City of Beverly Hills collects data on new housing construction and demolition. As of June 30, 2005, 460 total housing units were constructed in the City of Beverly Hills, exceeding the 1998-2005 RHNA allocation of 256 units. During the same period, 238 units were demolished, resulting in a net gain of 222 homes.

#### ***Multi-Family Housing***

Between January 1, 1998, and June 30, 2005, 153 net multi-family units were completed, per information compiled by the Community Development Department. The vast majority were condominium units that were affordable to above-moderate-income households (Table 53 (Multi-Family Units Completed January 1, 1998, to December 30, 2005)).

Table Multi-Family Units Completed January 1, 1998, to December 30, 2005			
Demolished	Constructed	Net	Income Level: Above Moderate
89	242	153	153

*Single-Family Housing*

In addition to the multi-family residential activity described above, a few single-family homes were built in the City of Beverly Hills during the planning period of the previous housing element. The City's database shows that 69 net new single-family homes were constructed. These homes were located throughout the community and were affordable to above-moderate-income households (Table 54 (Single-Family Units Completed January 1, 1998, to December 30, 2005)).

Table Single-Family Units Completed January 1, 1998, to December 30, 2005			
Demolished	Constructed	Net	Income Level: Above Moderate
149	218	69	69

Due to the high cost of housing in the community, all of the 222 units constructed during the prior planning period were affordable to above-moderate-income households (Table 55 (Units Completed January 1, 1998, to December 30, 2005, and RHNA Accomplishments)). The City's remaining RHNA allocation for the 1998-2005 RHNA period is 117 units that are affordable to very low-, low-, and moderate-income households.

Table Units Completed and RHNA Accomplishments January 1, 1998, to December 30, 2005,					
Data as of December 31, 2005	Number of Units	Very Low	Low (51-80%)	Moderate (81-120%)	Above Moderate
Completed Units	222	0	0	0	222
RHNA Allocation	256	35	42	40	139
<b>Remaining RHNA</b>	<b>117 affordable units</b>	<b>35</b>	<b>42</b>	<b>40</b>	<b>0</b>

SOURCE: City of Beverly Hills Community Development Department, 2008

Housing rehabilitation plays an important role in maintaining the quality of housing, preserving the overall quality of neighborhoods, and contributing to a higher quality of life. The City of Beverly Hills goal for the prior Housing Element was to provide rehabilitation assistance to 210 lower-income households. The City has more than

exceeded this goal. The City has continued to fund the Handyworker program, which provides assistance for repairs, security improvements, and mobility assistance for low-income tenants and homeowners. Approximately 240 households were served by the program in the last planning period.

Other accomplishments the City has achieved towards achieving its housing goals are summarized in Table 47.

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**Table Housing Program Accomplishments (1998 – 2005)**

**Program**

**Progress/Appropriateness**

**Prior Goal 1:** Maintain the community's housing stock; preserve the viability and stability of residential neighborhoods.

*Objective 1.1: Develop, continue, and pursue programs to maintain and improve the physical condition of existing housing stock.*

**Program 1.1** Continue and expand federally funded Handyworker Program (minor repairs/improved security/mobility assistance for low-income tenants and homeowners. The goal is to serve approximately 48 households per year; however, based on the actual total of 84 households served between July 1, 1998, and June 30, 2000, it is expected that approximately 210 households will be served between July 1, 2000, and June 30, 2005.

**Progress:** The City has continued to fund these programs. The funding amounts have remained fixed at approximately \$190,000 for the City's Handyworker program and \$40,000 for Senior Services for the time period of July 1, 2000, to June 30, 2008. While the number of households served has decreased to approximately 40 households per year, approximately 240 households were served by the program in the last cycle.

**Appropriateness:** This program remains appropriate for the element, but has been divided into two programs to better track program funding and success. The programs are now 9.4 "Home Repair and Improvement" and 11.3 "Senior Case Management Program".

**Program 1.2** Continue program under rent stabilization ordinances of investigation of tenant complaints about rent increases, service reductions, evictions, relocations and increase notices at a rate of approximately five per month, based on the actual total of 117 between July 1, 1998, and June 30, 2000. It is expected that approximately 380 tenant complaints will be investigated between July 1, 2000, and June 30, 2005.

**Progress:** For the period between July 1, 2000, and June 30, 2005, the total rent control complaints received and addressed was 196. The total number of Chapter 5 tenants that have displaced as a result of a multi-family building demolition or conversion during the planning period was 13. This number reflects only the complaints received by code enforcement, since there is no requirement to register rent controlled units with the City, the actual total may be higher.

**Appropriateness:** This program remains appropriate for the element, and is continued as program 9.6 "Rent Stabilization".

**Program 1.3** Continue program of enforcing property maintenance standards and investigating tenant complaints about property maintenance at a rate of approximately 23 per month, based on an actual total of 539 between July 1, 1998, and June 30, 2000. It is expected that approximately 1,380 tenant complaints will be investigated between July 1, 2000, and June 30, 2005.

**Progress:** For the period between July 1, 2000, and June 30, 2005, the total number of property maintenance complaints received and addressed was 1,310.

**Appropriateness:** This program remains appropriate for the element, and is continued as program 9.2 "Property Maintenance".

**Program 1.4** Continue to require that the exterior of vacated multifamily structures which will be demolished for condominium development are adequately maintained as a condition of extension of tentative map approval for the site. Explore feasibility of a

**Progress:** The City currently requires all vacated buildings and properties to be maintained in a manner that meets certain safety, and aesthetic standards.

**Appropriateness:** Program is revised as program 9.1 "Upkeep and Maintenance of Vacated Buildings" and now applies to all projects that would demolish an existing multi-family building, not just condominium projects. Additionally, the program is now pro-active. The

**Table Housing Program Accomplishments (1998 – 2005)**

Program	Progress/Appropriateness
program to encourage aesthetic maintenance standards for exterior yards and the front of residential structure.	City's code enforcement office maintains a list of properties and regularly visits the sites to ensure compliance.
<b>Program 1.5</b> Encourage residential property owners to rehabilitate empty units using federal, state, or local funds in exchange for limiting rent levels for target groups of low and moderate incomes.	<p><b>Progress:</b> No units were rehabilitated through this program.</p> <p><b>Appropriateness:</b> Discontinue program. The vacancy rate of multi-family units in the City remains around 3%. Given this significantly low rate, and the reality that there are very few empty rental units in the City, this program is being discontinued as it has not been effective.</p>
<i>Objective 1.2: Stabilize older multifamily areas and at the same time renew selected areas.</i>	
<b>Program 1.6</b> Review the scale and nature of existing multifamily residential development to determine whether development standards should be modified to encourage development in some areas, and protect the existing scale of development in others. In the event that residential zoning is proposed for the south side of North Santa Monica Boulevard east of Beverly Boulevard, a substantial setback and buffer from North Santa Monica Boulevard should be incorporated.	<p><b>Progress:</b> The City has explored ways of retaining the existing character of multi-family neighborhoods while also allowing for some amount of redevelopment. A result of this study was to allow additional residential units to be constructed above existing detached garage structures on multi-family properties. The City has not seen this incentive used often however, and would like to continue to explore ways of retaining existing neighborhood character while allowing a certain amount of redevelopment to occur.</p> <p><b>Appropriateness:</b> This program remains appropriate to the element, and is continued as program 12.2 "Adjust Development Standards". The program is modified to apply only to existing multi-family areas, as opposed to considering residential uses in commercial areas as well.</p>
<b>Program 1.7</b> Continue study of parking-deficient multifamily residential areas; evaluate permit parking zones and overnight parking in areas of deficient off-street residential and nonresidential parking.	<p><b>Progress:</b> This program did not occur.</p> <p><b>Appropriateness:</b> This program is being discontinued from the housing programs because it does not address the creation of new housing units or continued affordability of existing housing units.</p>
<i>Objective 1.3: Continue to refine development standards for single-family residential zones to assure compatibility of new, large development with established neighborhoods.</i>	
<b>Program 1.8</b> Continue study of all aspects of the maximum zoning envelope for single-family residential development, including standards for accessory structures (as distinct from secondary units), lot coverage, setbacks, basements, possible reduction in minimum unit size, etc.	<p><b>Progress:</b> In 2003 the City adopted language that allows second units by right, provided that the units are less than 650 square feet in size. In this language, the City references the minimum unit size allowed by California Health and Safety Code 17950.1.</p> <p><b>Appropriateness:</b> From time to time, the City continues to review and refine development standards for single family homes. This program is being discontinued from the housing</p>

**Table Housing Program Accomplishments (1998 - 2005)**

Program	Progress/Appropriateness
<p><b>Program 1.9</b> Develop standards for lots with substandard widths or sizes.</p>	<p>programs because it does not address the creation of new housing units or continued affordability of existing housing units.</p> <p><b>Progress:</b> This has been addressed on a case-by-case basis as the need has occurred.</p> <p><b>Appropriateness:</b> There are very few lots in the City which have substandard lot widths and area. Most of these lots are located above Sunset Boulevard, which is a single-family residential area with a minimum lot size of 1 acre. Lots below Sunset Boulevard tend to be of standard width and size. As a part of program 12.2 "Adjust Development Standards" the City will explore revisions to standards for projects proposed on single lots in the City's multi-family areas, which may allow those lots to be developed in much the same way as projects on multiple lots in the same area.</p>
<p><b>Prior Goal 2:</b> Maintain, preserve and seek opportunities to expand rental housing affordable to lower-income households, including the elderly, young households, households with children and single parent households.</p>	
<p><i>Objective 2.1: Maintain and preserve existing housing affordable to lower-income households.</i></p>	
<p><b>Program 2.1</b> If funding permits, continue and if feasible expand the Handyworker Program which provides minor repair/improved security/mobility aids to lower-income households. Continue priority scheduling of elderly, handicapped, and single parent households. (See Program 1.1 for goals for the planning period.)</p>	<p><b>Progress:</b> Refer to 1.1. Priority scheduling for the elderly, handicapped, and single parent households to receive Handyworker aids did not occur. The City continues to operate this program for lower-income households based on eligibility and the timing of the application.</p> <p><b>Appropriateness:</b> This program remains appropriate for the element; however, this program was a duplicate of program 1.1. Program is being combined with program 1.1, and is continued as program 9.4 "Home Repair and Improvement".</p>
<p><b>Program 2.2</b> Continue to monitor existing assisted housing (Section 202 project and Section 8 Existing/vouchers). Seek ways to increase access of qualified Beverly Hills residents to available rental support programs.</p>	<p><b>Progress:</b> The City has traditionally had a low number of Section 8 voucher holders due to high cost of housing in the community. The City has not examined means of increasing access to available rental support programs; however, the City, as a member of the Westside Cities Subregion, is currently assembling a number of strategies and outreaching to local large employers to identify and develop means of providing housing options to the areas workforce.</p> <p><b>Appropriateness:</b> This program remains appropriate for the element, and is continued as program 9.7 "Monitoring Affordable Housing".</p>

**Table Housing Program Accomplishments (1998 – 2005)**

Program	Progress/Appropriateness
<p><b>Program 2.3</b> Continue to monitor the conversion or demolition of apartment units subject to the Condominium Conversion Ordinance (Ordinance 82-O-1839, which limits the rate at which apartment units may be demolished or converted to condominium units). Evaluate the effect of this ordinance and make changes as appropriate.</p>	<p><b>Progress:</b> Through ordinance 06-O-2497, effective 4/6/2006, the City requires discretionary review of all common-interest-developments including the conversion of existing apartment buildings to condominiums. The ordinance is designed to maintain the architectural look of certain multi-family areas in the City which were lots were developed all in the same period. Discretionary review allows existing multi-family buildings to be converted to condominiums without meeting all of the current development standards (including a reduction in parking requirements) if the building is determined to contribute to the character of the neighborhood.</p> <p><b>Appropriateness:</b> Revise Program.</p>
<p><b>Program 2.4</b> Investigate legal ways of delaying demolitions of older apartment buildings until new projects approved for these sites are ready to be implemented, for example upon issuance of construction permits or funding.</p>	<p><b>Progress:</b> No progress has been made on this.</p> <p><b>Appropriateness:</b> This program remains appropriate for the element, and is continued as program 9.5 "Condominium Conversions". Through the revised program the current ordinance will be evaluated and new requirements for affordability may be considered.</p>
<p><i>Objective 2.2: Expand supply of housing affordable to lower-income households.</i></p>	
<p><b>Program 2.5</b> Encourage use by for-profit and nonprofit housing developers of available federal and state financing and tax credit programs for development of affordable housing.</p> <ol style="list-style-type: none"> <li>1. Promote utilization of City's existing density bonus, low-income senior housing, second unit, and efficiency unit bonus ordinances.</li> <li>2. Consider permitting second units without a discretionary permit provided standards for size, parking, etc. are applied.</li> <li>3. Consider feasibility of permitting only one kitchen per dwelling unit in order to encourage creation of legal second units.</li> <li>4. Assist developers of low-income housing by providing or encouraging use of such federal and state funding as is available (e.g., Community Development Block Grant, HOME funds, etc. See</li> </ol>	<p><b>Progress:</b> The following is a bulleted summary of progress of this program.</p> <ul style="list-style-type: none"> <li>• <u>Promote Utilization of Existing Ordinances</u> - The City encourages use of the existing density bonus, efficiency unit bonus, and second unit ordinances. The City has seen use of the second unit ordinance, has approved two projects which utilized the density unit bonus. No project has made use of the efficiency unit bonus and no new senior housing has been constructed in this housing cycle.</li> <li>• <u>Second Unit Ordinance</u> - The City adopted a second unit ordinance that allows second units by right provided that the second units meet certain standards. The ordinance (Ordinance 03-O-2427) took effect on 9/23/2003; this ordinance addressed both item 2 and item 3 in the list. Use of the ordinance has been successful, resulting in 20 discretionary level second units approved and additional non-discretionary level second units constructed. The department estimates an average of three second units requiring discretionary level review are approved annually.</li> <li>• <u>Assist Developers in Using Available Funding Sources</u> - The City has been in talks with a local nonprofit housing group, and both are exploring opportunities. The main issue facing both the City and non-profit developers is the base cost of land in the city.</li> </ul>

**Table Housing Program Accomplishments (1998 – 2005)**

Program	Progress/Appropriateness
<p>Appendix 5.4).</p> <p>5. Analyze feasibility of eliminating Park and Recreation tax and the Dwelling Unit tax for new units reserved for low- and moderate-income households.</p>	<ul style="list-style-type: none"> <li>• <u>Elimination of the Park and Recreation and Dwelling Unit Tax</u> – Any new dwelling unit used exclusively to house very low-, low-, or moderate-income persons, elderly or persons living with disabilities are exempted from Park and Recreation and Dwelling Unit taxes (Ordinance 02-O-2419, Adopted January 17, 2003).</li> </ul> <p><b>Appropriateness:</b> This program remains appropriate for the element; however, because the subject matter covered by this program is extensive, the program has been divided into several programs in the new element. The programs that replace this program include:</p> <p>10.1 “Density Bonus” –updates the existing ordinance to include specific lists of development incentives and concessions.</p> <p>10.4 “Second Units” –explores options for modifying the development standards for second units on properties located below Santa Monica Boulevard as a means of further encouraging second units.</p> <p>10.5 “Affordable Housing Brochure and Outreach” – develops a brochure and downloadable handouts on the City’s affordable housing incentives.</p> <p>10.7 “Partnerships with Affordable Housing Developers” – explores further means of collaborating with and encouraging housing developers to develop affordable housing options.</p> <p>11.2 “Senior Housing Development” –explores options for modifying existing incentives for senior housing in order to encourage greater use of the ordinance.</p> <p>12.2 “Adjust Development Standards” – explores options for modifying existing development standards to maintain and enhance the quality of neighborhoods while encouraging a greater variety of housing affordability in multi-family areas.</p> <p>12.3 “Reduced Fees for Affordable Housing” – The City currently waives the Parks and Recreation and Dwelling Tax fees for affordable housing projects. This program explores other means of reducing overall fees for affordable housing projects.</p>
<p><b>Program 2.6</b> Create a local fund to assist developers of housing affordable to lower-income households. Possible methods of creating this fund could include requiring an in-lieu fee where commercial or residential redevelopment above some minimum size results in a net loss of residential units, or could include an inclusionary requirement on new, market rate multifamily residential development above some</p>	<p><b>Progress:</b> Currently the City has required money be provided for affordable housing from three major development projects. These projects are still in the permitting process and no money has been deposited yet, although it is the intention to establish a Housing Trust Fund when funds from those projects come in.</p> <p><b>Appropriateness:</b> This program remains appropriate for the element. The City will explore other means of providing funds to a Housing Trust Fund, and will begin collecting and accumulating funds for future use through program 10.3 “Housing Trust Fund”.</p>

**Table Housing Program Accomplishments (1998 – 2005)**

Program	Progress/Appropriateness
<p>minimum size with the requirement met by a choice of development of low-income units or an in-lieu payment to the housing fund.</p> <p>Review appropriateness of utilizing City-owned property for low-income housing, possibly as part of a mixed-use development.</p>	
<p><b>Program 2.7 #1</b> Continue to use CDBG funds to support a Senior Case Management program which assists frail elderly persons to remain in their homes. The program served 125 persons between January 1, 1998, and June 30, 2000, and is expected to serve 250 persons between July 1, 2000, and June 30, 2005.</p> <p><b>#2</b> The Senior Homeshare program that provides screened referrals of prospective roommates to seniors who wish to share housing to reduce costs and increase companionship and sense of security, has served 301 seniors between January 1998 and June 2000, and is expected to serve 582 between July 2000 and June 2005.</p> <p><b>#3</b> Consider reducing cost of certain City services for seniors with incomes not exceeding some pre-established level.</p>	<p><b>Progress:</b> Discussion of the City’s CDBG funding Senior Case Management program is included in the current programs – program 11.3 “Senior Case Management Program”. The City contracts with Jewish Family Services to provide comprehensive case management to assist frail elderly residents remain in their homes. Approximately 4,000 seniors were served through the Senior Case Management and Senior Homeshare program from 2000-2005.</p> <p><b>#3:</b> The City offered free senior recreation and fitness classes (\$1.00 dollar was charged to non-residents) during the 1998-2005 planning cycle. Due to budget cuts, in 2010 the City began charging \$1.00 dollar to all participants. Proceeds go directly to the class instructor. The City makes the Roxbury fitness center and all fitness equipment available free of charge. The City is served by Southern California Edison and the Gas Company. Both of these utility providers offer reduced rates for low income customers. The City of Beverly Hills operates its own water district. Due in part of the small size of the water district, the City has not been able to offer a reduced rate program at this time.</p> <p><b>Appropriateness:</b> This program remains appropriate for the element and the City will continue to offer low cost recreation and fitness classes and opportunities to seniors. The City will also continue to explore means of reducing costs for City services through program 12.3 “Reduced Fees for Affordable Housing”.</p>
<p><b>Program 2.8</b> As funds permit, continue to provide support to organizations assisting the homeless through the provision of services and housing.</p>	<p><b>Progress:</b> The City currently provides funds to two programs that serve homeless persons: CLASP and a family emergency shelter located in Culver City. Beverly Hills launched the CLASP (Changing Lives and Sharing Places) program in January 2008, providing street outreach workers through Step Up On Second to connect homeless persons with services and shelter; the program currently has 46 homeless on its active case management list. The City contracts with PATH (People Assisting the Homeless) to provide emergency housing for homeless individuals going through the CLASP program. The City provided \$200,000 to support Upward Bound House, a transitional living center for families with children which opened in 2010. Through its annual Community Services Assistance Grant application, the City continues to fund service agencies that assist the homeless and at-risk homeless populations.</p> <p><b>Appropriateness:</b> An expanded Homeless Assistance Program has been incorporated into the</p>

**Table Housing Program Accomplishments (1998 – 2005)**

Program	Progress/Appropriateness
<p><b>Program 2.9</b> Revise the City’s density bonus ordinance to bring it into compliance with recently enacted state legislation that includes conversion of office space to residential units as an eligible project.</p> <p>Allow reduction in parking standards for units reserved for elderly; permit one additional story above right of zone in some areas.</p> <p>Study providing additional incentives for set-aside units of three bedrooms to increase the supply of affordable units large enough for families.</p> <p>Revise zoning standards to permit replacement of free-standing garages of existing multifamily residential structures with garages with one or more additional dwelling units on the second story.</p>	<p>updated Element to better reflect the City’s commitment to assisting the homeless.</p> <p><b>Progress:</b> On September 16, 2005, the City’s revised Density Bonus Ordinance, 05-O-2482, became effective. The ordinance is in compliance with state legislation. The City has approved one project under the new ordinance –a project on Elm Drive with three low income units – with a second project on Durant Drive with two low income units pending approval.</p> <p>The City has established modified standards to specifically encourage the provision of higher density rental housing for seniors and persons with disabilities, including increased densities and height, and reduced parking and unit sizes. The housing needs assessment identifies seniors and the local workforce as the primary groups with affordable housing needs, a program to incentivize large family affordable housing is no longer appropriate.</p> <p>By ordinance 01-O-2388, and 02-O-2394, the City allows existing, free-standing garages serving MFRs to be replaced with garages that include one or more dwelling units as a second story. These zoning provisions allow the development of additional, small sized units, appropriate to serve the community’s workforce.</p> <p><b>Appropriateness:</b> The density bonus program remains appropriate to the updated Element. To provide better information to the development community, the City will modify its ordinance to specify the types of development incentives to be offered, and promote density bonus opportunities through the City’s Affordable Housing Brochure.</p> <p>Provision of modified standards to encourage housing for seniors remains appropriate, and has been included as Program 11.2 in the updated Element.</p>
<p><b>Prior Goal 3:</b> Maintain the general scale and character of the City through directed revitalization. Include in the review of any proposed revisions consideration of the City’s history, its evolution to its current character, and what the residents’ future housing needs may be.</p>	
<p><i>Objective 3.1: Maintain the general height and density limits, while permitting selected, limited increases in height or other standards to meet other objectives, provided such modifications result in development generally compatible with the surrounding area.</i></p>	
<p><b>Program 3.1</b> Permit a limited increase in maximum allowable heights, taking into consideration road width and other factors, in selected multifamily residential areas. Limited height increases can act to compensate for the propensity of developers to build less than the</p>	<p><b>Progress:</b> The maximum allowable heights in the three-story area east of Maple Drive and north of Burton Way have been increased to four stories or 45 feet. The area around Hamilton, Gale, and Tower Drives has also been increased to four stories or 45 feet.</p> <p><b>Appropriateness:</b> This program remains appropriate for the element, and is continued as part</p>

**Table Housing Program Accomplishments (1998 – 2005)**

Program	Progress/Appropriateness
<p>maximum number of units possible where large units are desired, so that the full development potential of sites may be achieved. Such areas could include:</p> <ul style="list-style-type: none"> <li>■ Areas where existing two-story multifamily residential height limits about three-story commercial streets: increase height limit to three stories (involving approximately 49 lots);</li> <li>■ Three-story areas currently surrounded by five- and four-story height limits (east of Maple Dr. north of Burton Way): increase to five stories (involving approximately 96 lots); and</li> <li>■ The area surrounded by commercial development and La Cienega Park (Hamilton, Gale and Tower Drives south of Wilshire Boulevard): increase the existing height limit to four stories (involving approximately 76 lots)</li> </ul>	<p>of program 12.2 "Adjust Development Standards".</p>
<p><i>Objective 3.2: Revitalize older residential areas with new development which provides environments consistent with the character and quality of life generally associated with the City's single- and multiple-family residential areas.</i></p>	
<p><b>Program 3.2</b> Continue review by the Architectural Commission of multifamily development to assure high-quality design. By ensuring high-quality design, the City hopes to lower effective housing costs in the longer term by reducing the need for costly maintenance, repairs, and upgrades after multifamily developments are occupied.</p>	<p><b>Progress:</b> Ongoing</p> <p><b>Appropriateness:</b> Although this program is on-going, it is being removed from the housing programs because it does not create new housing units. Potential constraints resulting from this program will continue to be studied through programs 12.2 "Adjust Development Standards" and program 12.3 "Reduce Fees for Affordable Housing" to assure that the benefits provided by this program do not have the unwanted effect of discouraging affordably priced housing options.</p>

**Table Housing Program Accomplishments (1998 – 2005)**

Program	Progress/Appropriateness
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**Prior Goal 4:** Expand the variety of housing product on a limited basis beyond single-family detached, rental apartment and condominium units.

*Objective 4.1: Create a new single-family residential zone: "single-family attached."*

**Program 4.1** Develop standards for a new single-family residential zone (CR-1A) in which attached owner units would be permitted in selected R-1 zoned areas, with standards to be compatible with existing R-1 standards, but which maximize open space and emphasize security. Such developments would require that a minimum of two lots be developed at the same time. In identified areas, include consideration of locating the new zone in such a way as to improve existing transitions between commercial and single-family detached residential areas and border areas in locations where such adjacencies have been identified as a problem. Also study appropriateness of R-1A zone on substandard sized R-1 zoned lots. Analyze effect of the existence or lack of an alley separating commercial and residential land uses

**Progress:** No progress has been made on this program.

**Appropriateness:** This program does not create new housing and is being removed from the housing programs. The City will explore other programs such as program 10.1 "Density Bonus", program 10.2 "Inclusionary Housing" and program 12.2 "Adjust Development Standards", as these programs have a greater chance of encouraging more affordably priced housing options in the City.

*Objective 4.2: Create a new multifamily residential zone: "townhouse."*

**Program 4.2** Develop standards for a new multifamily residential zone (R-4T) in which dwelling units would be required to be constructed in the townhouse style, i.e., units would be constructed side-by-side with no other units above or below. Consider feasibility of locating the R-4T zone in such a way as to encourage limited redevelopment of older areas. Initial study areas could include but not be limited to:

- The north side of Clifton Way between Amaz Drive and Le Doux Road
- Small, substandard sized legally nonconforming lots currently zoned for multi-family residential for which current R-4 development standards are

**Progress:** No progress has been made on this program.

**Appropriateness:** This program is continued in program 12.2 "Adjust Development Standards", which includes a list of options that the City will consider to encourage more affordable housing in the City. The City is able to meet the requirements of RHNA with the capacity in existing multi-family residential areas and so may not consider the creation of entire new R-4 areas, but will consider a series of development options for current multi-family areas that will ensure that the existing neighborhood character is maintained while also allowing for some redevelopment to occur.

**Table Housing Program Accomplishments (1998 – 2005)**

Program	Progress/Appropriateness
<p>inappropriate</p> <ul style="list-style-type: none"> <li>■ N. Doheny Dr. between Wilshire Boulevard and Burton Way</li> </ul> <p>(Although the legally nonconforming lots were not inventoried, the potential rezoning of these R-1 zoned areas could result in a net increase of approximately 94 units.)</p>	
<i>Objective 4.3: Develop standards for mixed commercial and residential uses.</i>	
<p><b>Program 4.3</b> Develop standards for mixed residential-commercial structures, with and without low-income housing components, including additional height, in areas currently zoned for commercial use and consider appropriateness of various areas, such as:</p> <ul style="list-style-type: none"> <li>■ South side of Wilshire Blvd., east of Beverly Dr. (Between Stanley Dr. and Le Doux Rd., extend to north side of Charleville Blvd.)</li> <li>■ Eastern area of Business Triangle</li> <li>■ South side of Burton Way (commercially zoned parcels)</li> <li>■ Olympic Boulevard (commercially zoned parcels)</li> <li>■ La Cienega Boulevard north of Wilshire Boulevard</li> <li>■ City-owned property where some or all of the residential units would be for lower-income households</li> <li>■ East side of South Beverly Drive</li> </ul>	<p><b>Progress:</b> Standards have been developed for mixed commercial-residential structures through development agreements and specific plans adopted for several projects.</p> <p>In the 1998-2005 planning cycle two commercial property were re-designated/ re-zoned for residential/ commercial uses:</p> <ul style="list-style-type: none"> <li>• <u>Beverly Gardens Specific Plan</u> (202-240 Beverly Dr) – Establishment of a new land use designation “Beverly Gardens Specific Plan Area” (Hotel, 25 condominiums, office, retail, public park, public parking garage)</li> <li>• <u>Blu Apartments</u>, 8601 Wilshire (2 lots, 93 units/ acre) – 36 units over retail/commercial</li> </ul> <p>In the 1998-2005 planning cycle the final property on North Crescent that is designated and zoned for residential/ commercial uses was developed:</p> <ul style="list-style-type: none"> <li>• <u>Crescent Project</u> (131-191 N Crescent) – 88 apartments and 40,000 square feet office/retail.</li> </ul> <p>In the 2006-2014 planning cycle several other commercial properties were re-designated/re-zoned for residential/ commercial uses:</p> <ul style="list-style-type: none"> <li>• 8600 Wilshire – 23 condominium units, 3 affordable, over retail/commercial</li> <li>• 402 Beverly (Beverly Hills Gardens Specific Plan) – 25 condominium units, new hotel, quarter acre public park and retail/commercial space.</li> <li>• 9200 Wilshire – 54 condominium units over retail/commercial (with contribution to housing trust fund).</li> <li>• 9872 Wilshire (Beverly Hilton) – 110 new condominium units, hotel and retail/commercial uses (with significant contribution to housing trust fund).</li> </ul>

Table Housing Program Accomplishments (1998 - 2005)	
Program	Progress/Appropriateness
	<ul style="list-style-type: none"> <li>• 9900 Wilshire (Rob-May Department Store) - 235 condominium units over retail/commercial, (with significant contribution to housing trust fund)</li> </ul> <p><b>Appropriateness:</b> This program has been successful in increasing the overall amount of property in the City available for residential uses. However, the total lands in the City available exclusively for commercial uses is less than 9% of the City's total land area and the City's budget is highly-dependent on business revenues. Additionally, the City has adequate capacity to meet the requirements of the RHNA within the existing multi-family areas. Therefore, this program is being discontinued.</p>
<p><b>Program 4.4</b> Develop new standards for and enact an ordinance which would permit and regulate home occupations in residential zones.</p>	<p><b>Progress:</b> On November 2, 2001, the City adopted ordinance 01-O-2383 that allowed home occupations in residential zones provided that certain standards</p> <p><b>Appropriateness:</b> This program has been completed.</p>

## HOUSING PLAN

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The Housing Plan is the City's goals and policies, and programs and quantified objectives to meet the community's housing needs.

### 2008-2014 Goals and Policies

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**H1 Maintenance and Conservation.** Maintain and enhance the quality and character of existing housing and residential neighborhoods.

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H 1.1 **Neighborhood Character.** Maintain the character and quality of residential neighborhoods. (Imp. 9.1, 9.2)

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H 1.2 **Healthy and Safe Housing.** Support healthy neighborhoods by addressing public health and safety issues, performing property inspections, and eliminating threats to public health. (Imp. 9.3)

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H 1.3 **Home Repair Assistance.** Provide assistance to low- and moderate-income households to encourage the adequate maintenance and rehabilitation of existing housing, such as through the Handy-worker program. (Imp. 9.4)

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H 1.4 **Historic Preservation.** Promote the preservation of historically and architecturally significant buildings and the quality of historic neighborhoods through land use, design and housing policies.

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H 1.5 **Conservation of Existing Rental Housing.** Regulate the conversion of rental apartments to condominium ownership. (Imp. 9.5)

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H 1.6 **Rent Stabilization.** Continue to provide tenant protections through the City's Rent Stabilization Ordinance. (Imp. 9.6)

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H 1.7 **Preservation of Affordable Housing.** Support preservation of publicly subsidized rental housing to maintain affordability to lower income households. (Imp. 9.7)

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**2008 – 2014 Housing Element  
Goals and Policies**

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**H2 Housing Supply and Diversity.** Provide a variety of housing types and adequate affordable housing supply to meet the existing and future needs of the community.

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H 2.1 **Affordable Housing Incentives.** Offer incentives, including density bonuses, where feasible to offset or reduce the costs of developing affordable housing. Proactively seek out new approaches in the provision of affordable housing. (Imp. 10.1, 11.2, 12.2)

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H 2.2 **Inclusionary Housing.** Pursue adoption of an inclusionary housing program to integrate affordable units within market rate developments, and increase the availability of affordable housing throughout the community. (Imp. 10.2)

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H 2.3 **Housing Trust Fund.** Create a Housing Trust Fund to financially assist nonprofit and for-profit developers in the creation of affordable housing. (Imp. 10.3)

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H 2.4 **Second Units.** Promote second units as a means of providing lower cost housing options for seniors, caretakers, and others. (Imp. 10.4)

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H 2.5 **Adaptive Reuse.** Support innovative strategies for the adaptive reuse of residential and commercial structures to provide for a wide range of housing types. (Imp. 12.2)

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H 2.6 **Site Information.** Provide information to residential developers regarding sites that may be suitable for new affordable housing development. (Imp. 10.5)

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H 2.7 **Environmentally Sustainable Housing.** Promote conservation of water and energy, use of sustainable building materials and drought-resistant landscaping to reduce the operating costs and carbon emissions associated with housing. (Imp. 10.6)

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## **2008 – 2014 Housing Element Goals and Policies**

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H 2.8 **Transit-Oriented Housing.** Promote access, where feasible, from residential neighborhoods and new residential development to existing transit stops and to the anticipated subway stations. (Imp. 12.2)

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H 2.9 **Jobs/ Housing Balance.** Promote programs seeking to provide housing opportunities for people who work in the City as a means of reducing long commutes, easing local traffic, improving air quality and helping to achieve a balanced regional jobs/housing distribution for the western portion of Los Angeles County. (Imp. 10.7)

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H 2.10 **Workforce Housing.** Study and develop programs to increase the amount of rental and ownership housing affordable to the local workforce. (Imp. 10.7, 12.2)

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H 2.11 **Partnerships for Affordable Housing.** Explore opportunities for partnerships with adjacent jurisdictions and other governmental agencies in the provision of housing. Collaborate with non-profit organizations to provide greater access to affordable housing funds. (Imp. 10.7)

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**H3 Fair Housing and Special Needs Residents.** Promote equal housing opportunities for all residents; including Beverly Hills' special needs populations, so residents have a choice of appropriate housing.

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H 3.1 **Fair Housing Practices.** Promote fair housing and non-discrimination in the sale and rental of housing by coordinating with organizations that provide information, counseling and mediation on fair housing laws and landlord-tenant disputes. (Imp. 11.1)

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H 3.2 **Senior Housing.** Support the provision of a variety of housing options for seniors to foster independence and the ability of seniors to remain in the community as they age. (Imp. 11.2)

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**2008 – 2014 Housing Element  
Goals and Policies**

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H 3.3 **Senior Support Services.** Continue to offer housing support services for seniors, including case management and home-share programs. (Imp. 11.2, 11.3)

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H 3.4 **Housing Accessibility.** Address the special housing needs of persons with disabilities through adoption of reasonable accommodation procedures, homeowner’s assistance grants, and supportive housing. (Imp 11.4)

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H 3.5 **Homeless Programs.** Continue to provide support to community service organizations that assist the homeless through provision of housing and services. (Imp. 11.5)

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**H4 Constraints.** Mitigate potential governmental constraints on the maintenance, improvement and development of housing, while maintaining community character.

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H 4.1 **Zone for a Variety of Housing Types.** Amend the Zoning Ordinance, as required by State law, to facilitate the provision of a variety of housing types for special needs populations, including persons with disabilities, the homeless, and persons at risk of homelessness. (Imp. 12.1)

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H 4.2 **Adjust Development Standards.** Evaluate and modify development standards as appropriate to better facilitate the provision of affordable housing. (Imp. 12.2)

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H 4.3 **Fee Reduction.** Establish a process to provide fee waivers to facilitate the production of affordable, senior, and workforce housing. (Imp 12.3)

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## **2008-2014 Housing Programs**

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The Housing Element programs have been numbered to following sequentially behind the City's other General Plan Programs, which are numbered 1.0 - 8.0.

Housing Element statutes now require an analysis of the needs of extremely low income (<30% AMI) households, and programs to assist in the creation of housing for this population. The Beverly Hills Housing Element sets forth numerous programs which help to address the needs of extremely low income households, including: Home Repair and Improvement (Imp 9.4); Rent Stabilization (Imp 9.6); Monitoring Affordable Housing (Imp 9.7); Housing Trust Fund (Imp 10.3); Second Units (Imp 10.4); Partnerships with Affordable Housing Developers (Imp 10.7); Senior Housing Development (Imp 11.2); Senior Case Management (Imp 11.3); Senior Homesharing (Imp 11.4); Funding for Homeless Services (Imp 11.6); and Zoning Text Amendments for Special Needs Housing.

## **9.0 Conserve and Improve Existing Housing Stock**

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### ***Imp 9.1 Upkeep and maintenance of vacated buildings***

The City requires the exterior of vacated multi-family structures that will be demolished for redevelopment to be adequately maintained as a condition of tentative map approvals and extensions.

The City's Code Enforcement Office (Community Preservation) maintains a list of all vacant properties in the City, monitors the sites, and works with the property owners to assure that the properties are maintained in an appropriate manner.

Timeline: Ongoing

Funding Source: Department Budget

Responsible City Section: Community Development Department

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### ***Imp 9.2 Property Maintenance***

The City requires housing to be maintained in an aesthetic, safe and habitable manner consistent with City codes. The program is run as part of the City's comprehensive Code Enforcement program (Community Preservation) and is structured as a reactive, complaint-driven inspection process.

Timeline: On-going

Funding Source: Department Budget

Responsible City Section: Community Development Department

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***Imp 9.4 Home Repair and Improvement***

The Handyworker Program provides minor home repair, and improved security and mobility assistance to low income tenants and homeowners in single and multi-family units. The program is administered by Jewish Family Services at no cost to the qualifying low-income owner or tenant. Jewish Family Services provides community outreach, applicant screening, pre-construction site visits, repairs and remodeling, and confirmation that the property meets the City's standards for habitability.

Population Served: Extremely Low, Very-Low and Low- income (up to 80% AMI) households

Eligible Repairs: Interior/ Exterior Repairs, Energy Conservation Activities, Security/ Safety Improvements

Managed By: Jewish Family Services

Maximum Award Amount: \$2,000 grant. Award amount may increase up to \$5,000 if additional repairs are required to meet the City's standards for habitability.

Target: Serve 40 low income households per year.

Timeline: On-going

Funding Source: CDBG

Responsible City Section: City Manager's Office

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***Imp 9.5 Condominium Conversions***

This program limits loss of rental housing units due to the conversion of existing apartment buildings to condominiums by setting an annual cap and providing protections for tenants.

Currently, apartment buildings proposed for conversion to condominium ownership are subject to the City's condominium conversion regulations (Beverly Hills Municipal Code Sections 10-2-710, 711, and 712). These regulations set forth a series of tenant protections including tenant noticing, relocation provisions, right of first purchase, and extended lease provisions for senior and disabled households. These regulations also set an annual limit on the number of conversions allowed.

The City will evaluate the effectiveness of the existing ordinance, and consider modifying it to require a number of units in any building converted to be set aside as affordable rental or ownership housing. The City will also evaluate the benefit of offering an in-lieu fee option that would go into the City's Housing Trust Fund and be used to provide affordable housing elsewhere in the City.

Timeline: Evaluate ordinance revisions to address affordability in 2011, and, as appropriate, amend the ordinance in 2012.

Funding Source: Departmental Budget

Responsible City Section: Community Development Department

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***Imp 9.6 Rent Stabilization***

Continue the City's rent stabilization ordinance to investigate tenant complaints regarding unlawful rent increases, service reductions, evictions and relocations.

The Community Preservation Office administers the rent stabilization program which affects approximately 12,800 apartment units in the City. The ordinance limits annual rent increases to no more than ten percent and provides tenant protections through required noticing of rent increases and evictions. Community Preservation officers respond to approximately 480 inquires from residents annually, with approximately 30 complaints requiring follow-up investigation. Most complaints are resolved within 45 days, with the remainder being referred to "stepped up enforcement action", including but not limited to citations and further legal action.

Timeline: On-going

Funding Source: Departmental Budget

Responsible City Section: Community Preservation

Target: Investigate 30 complaints per year.

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***Imp 9.7 Monitoring Affordable Housing***

The City of Beverly Hills currently has one assisted housing project providing 150 units of affordable rental housing to very low income seniors. This project was originally financed under the HUD Section 202 program with project-based Section 8 certificates providing ongoing affordability. Although this project is not currently at risk of being converted to market rate housing, the City will continue to coordinate with the service provider to monitor Section 8 renewals, advise tenants in advance of any potential conversion dates, and provide opportunities to continue affordability covenants.

Number of Units: 150

Number of Affordable Units: 150 (Extremely Low and Very Low Income, Senior/ Disabled)

Year Built: 1988

Affordability Covenant: 40 years

Owner/Operator: Menorah Housing Foundation

Timeline: On-going

Funding Source: Departmental Budget

Responsible City Section: Human Services Division, Community Services Department

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## 10.0 Provide New Housing Opportunities

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### ***Imp 10.1 Density Bonus***

Beverly Hills updated its residential density bonus ordinance in 2005 consistent with current State requirements as specified under SB 1818. In summary, applicants of residential projects of five or more units may apply for a density bonus and additional incentive(s) if the project provides for one of the following, per State policy:

- *10% of the total units for lower income households; or*
- *5% of the total units for very low income households; or*
- *A senior citizen housing development that limits residency based on age requirements for housing for older persons; or*
- *10% of the total dwelling units in a condominium for moderate income households.*

The amount of density bonus varies according to the amount by which the percentage of affordable housing units exceeds the established minimum percentage, but generally ranges from 20-35% above the specified General Plan density. In addition to the density bonus, eligible projects may receive 1-3 additional development incentives, depending on the proportion of affordable units and level of income targeting.

The State requires the following incentives to be offered in conjunction with the density bonus:

- *A reduction in parcel development standards (coverage, setback, zero lot line and/or reduced parcel sizes)*
- *Approval of mixed use zoning in conjunction with the housing project*
- *Other regulatory incentives or concessions proposed by the applicant, or the City that would result in identifiable cost reductions*

By the City's ordinance, incentives offered are determined by the Planning Commission during the review process.

Pursuant to State requirements and at the request of the developer, the City will also permit a reduced parking ratio for density bonus projects. To the extent the density bonus cannot be accommodated due to the City's development standards, the City will waive or modify applicable standards to accommodate the bonus.

In order to provide greater certainty in the type of development incentives and concessions that could be requested, the City will modify the current ordinance to include specific lists of options.

Timeline: Modify the ordinance and promote the use of density bonus incentives through the City's Affordable Housing Brochure (Imp 10.5) by 2012.

Funding Sources: Department Budgets

Responsible City Section: City Manager's Office; Community Development

Department

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### ***Imp 10.2 Inclusionary Housing***

Beverly Hills will pursue adoption of an inclusionary housing program to require a minimum percent of units in development to be price-restricted as affordable to lower and moderate income households. The Ordinance will require either: (a) provision of affordable housing on-site; (b) provision of affordable units off-site; or (c) payment of an affordable housing in-lieu fee. Current case law (*Palmer/Sixth Street Properties v. City of Los Angeles*) limits the application of inclusionary requirements to: 1) for-sale housing projects, 2) rental projects receiving financial or regulatory assistance from the city subject to a written development agreement.

The City will conduct an inclusionary housing nexus study to document the relationship between residential development and demand for affordable housing, and to determine both the maximum supportable and recommended in-lieu fee amount. Based on the study's findings, the City will develop and adopt an inclusionary housing ordinance structured to offer incentives to help offset the cost of providing affordable units. In-lieu fees generated from the program will be contributed to the City's Housing Trust Fund.

Incentives offered under the Inclusionary Housing program will be linked with incentives offered under the City's Density Bonus program (Imp 10.1a)

Timeline: Conduct Inclusionary Housing Nexus and In-Lieu Fee Study in 2011, and adopt Ordinance by 2012.

Funding Sources: Department Budgets; future Inclusionary Housing In-lieu Fees.

Responsible City Section: City Manager's Office; Community Development Department

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### ***Imp 10.3 Housing Trust Fund***

Because the City does not have a Redevelopment Agency and has limited access to state and federal housing resources, the City faces practical and financial constraints in its ability to facilitate the construction of affordable housing. To create a more viable funding source, the City will establish a Housing Trust Fund that will be used to construct or help leverage construction of affordable housing. Potential Trust Fund resources include development agreements and in-lieu fees from an Inclusionary Housing Program. An Affordable Housing Program will be established to manage the Trust Fund and establish parameters for allocation of funds towards projects. Since January 1, 2006, the City has entered into three development agreements that included over \$4 million in funds allocated for the Housing Trust Fund. To date, none of these projects has submitted for building permits, and therefore, no funds have yet been collected. This program will move forward once a funding source has been identified, and will coincide with the collection of fees.

Timeline: 2012, to coincide with the adoption of an Inclusionary Housing Ordinance

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Funding Sources: Inclusionary Housing In-lieu Fees, Development Agreements

Responsible City Section: City Manager's Office

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### ***Imp 10.4 Second Units***

In compliance with AB 1866, Beverly Hills has developed both a ministerial approval process for second units that are less than 650 square feet in size, as well as a discretionary review process for larger second units proposed on properties above Santa Monica Boulevard. The City has received and approved an average of 3 discretionary applications annually since the current ordinance was adopted in 2003. In order to collect information on second units to determine who lives in them, rent ranges, size, and additional steps the City can take to encourage construction of second units, the City conducted a Citywide survey of residential property owners. One of the questions posed in the survey is the amount of rent charged on existing second units (if any), as a means of assessing affordability and contribution towards addressing the community's regional housing needs (RHNA). Of the 40 occupied second units in the survey, 81 percent were provided rent free or for a rental amount affordable to very low income households. The results of the survey indicate that the majority of second units in Beverly Hills are occupied by caregivers or elderly parents of the primary homeowner.

To further encourage the provision of second units, the City will evaluate modifications to its second unit ordinance, including:

- Greater flexibility in second unit standards in R-1 zones south of Santa Monica Boulevard
- Allowances for larger sized second units, of up to 1,000 square feet by right to reduce processing times, and facilitate the provision of second units with bedrooms (all other review requirements would remain). This may encourage housing options for single parent families and care-givers.
- For second units built above a garage, allowance for an increase in the permitted height up to the height of the primary residence.
- Allowances for reduced setback requirements where privacy is not compromised

The Community Development Department will develop a brochure to provide information on the City's second unit standards, and promote their development.

Timeline: Conduct Second Unit Survey in 2010. Evaluate revisions to current second unit standards, and amend the ordinance within one year of adoption of the Housing Element.

Funding Sources: Department Budgets

Responsible City Section: Community Development Department

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***Imp 10.5 Affordable Housing Brochure and Outreach***

The City will develop a brochure to summarize available incentives offered for the development of affordable housing, including fee waivers, density bonuses and inclusionary housing requirements. The brochure will also summarize development standards for all multi-family residential areas in the City, and will highlight the “efficiency bonus” and “bonus units above garages” provisions in the Zoning Code. A series of web page and downloadable handouts will be made available on the City’s website, in the permit center, and in other public information areas. (As an initial step, all materials will be mailed to major for-profit and nonprofit housing and mixed-use developers, and informational materials directing the development community to the webpage will be broadly distributed to increase awareness.)

Timeline: Develop and disseminate outreach materials in 2012.

Funding Sources: Departmental Budget

Responsible City Sections: Community Development Department

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***Imp 10.6 Sustainability and Green Building***

“Green buildings” are structures that are designed, renovated, re-used or operated in a manner that enhances resource efficiency and sustainability. These structures reduce water consumption, improve energy efficiency, and lessen a building’s overall environmental impact. The City of Beverly Hills adopted a local green building program in 2008, establishing requirements similar to the green building measures under the US Green Building Council’s LEED Program (Leadership in Energy & Environmental Design). The program ~~applies~~ applied to all new multi-family, mixed-use and commercial buildings, and renovations of multi-family, mixed-use and commercial buildings totaling over 50% in cost of the building’s valuation. In 2011, the City modified its existing green building program in light of the State of California’s Green Building Code (known as Calgreen). In adopting the Calgreen building code local amendments were adopted in order to preserve aspects of the City’s original green building program. Modifications of Calgreen include requiring new multi-family and commercial buildings to be constructed to 15% greater energy efficiency than the State’s Energy Code (Title 24), and include solar energy collection systems. If compliance with the program would frustrate the ability to provide affordable housing in a project, some or the entire program can be waived.

Beverly Hills has also adopted a Sustainable City Plan in conjunction with recent amendments to its General Plan. The overall goal of the Sustainable City Plan is to reduce the City’s carbon footprint by providing a model framework for sustainable practices for the environment, the economy and social equity.

Timeline: Ongoing.

Funding Sources: Departmental Budget

Responsible City Sections: Community Development, Public Works

Departments

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***Imp 10.7 Partnerships with Affordable Housing Developers***

In today's housing market, creative approaches are required to finance and build affordable and special needs housing. Beverly Hills successfully partnered with the non-profit Menorah Housing Foundation to achieve development of 150 units of affordable senior housing, and has contracted with Alternative Living for the Aging for implementation of the senior shared housing program in the past. Both of these organizations own and manage numerous affordable housing developments for seniors in greater Los Angeles and can serve as potential resources for future senior housing in Beverly Hills. Several other local non-profits have an excellent track record in securing State and federal funds to build quality, affordable housing, including -Abode Communities (formerly LA Community Design Center), West Hollywood Housing Corporation, Jamboree Housing, and National Community Renaissance. The City has recently been in talks with local non-profit housing providers and is actively pursuing partnership opportunities.

The City will initiate a partnership and continue to work with non-profit developers to assist in the development of housing affordable to extremely low and lower income ~~senior~~ households. The City will annually invite non-profit developers to discuss the City's plans, resources, site development opportunities and RFQ process. The City will select a non-profit developer to develop an affordable ~~senior~~ housing project, and will support in this effort through leveraging local Housing Trust Funds, assisting in the application for State and federal financial resources, facilitating project entitlement, and providing a package of incentives such as fee deferrals and relaxed development standards.

Timeline: Make initial contact with local nonprofits by the end of 2011. Conduct an annual meeting with builders and nonprofits to review resources, incentives and City goals. Initiate an RFQ process by the end of 2012, select a developer and pursue development of an affordable ~~senior~~ housing project. Provide priority assistance to projects which include a portion of units affordable to extremely low income households.

Funding Source for Administrative Costs: Departmental Budget

Funding Source for Development Cost: Housing Trust Fund

Responsible City Section: City Manager's Office, Community Development Department

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**11.0 Promote Equal Housing Opportunities and Special Needs Housing**

***Imp 11.1 Fair Housing Program***

As a participating jurisdiction in the Los Angeles County CDBG program, fair

housing services are coordinated by the County Community Development Commission on behalf of the City. The County currently contracts with the Housing Rights Center (HRC) to serve as the provider of fair housing and tenant-landlord information for its participating jurisdictions, including Beverly Hills. HRC provides fair housing investigation and coordinates referral services to assist individuals who may have been the victims of discrimination. Many of the people who contact HRC have basic questions about landlord and tenant rights and responsibilities; HRC's housing counselors provide clients with comprehensive information to help resolve tenant/landlord issues.

The City will continue to promote fair housing practices, and refer fair housing complaints to Housing Rights Center. As a means of furthering fair housing education and outreach in the local community, the City will advertise the fair housing program through placement of fair housing services brochures at public counters in City Hall and the library, at the Beverly Hills Senior Center, and on the City's website.

Timeline: Initiate advertising in 2011.

Funding Source: CDBG

Responsible City Section: Human Services Division, Community Services Department

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### ***Imp 11.2 Senior Housing Development***

The need for senior housing in the City is significant and growing, with nearly 30 percent of households in Beverly Hills headed by a senior citizen. Of the City's 1,600+ senior renter households, 45 percent are lower income (<80% AMI). Extremely low income (ELI) seniors (<30% AMI) face acute affordability problems, with two-thirds spending more than half their incomes on rent. The City will actively pursue development of an affordable housing project targeted towards Beverly Hills' extremely low and lower income seniors. As indicated in Program 10.7 (Partnerships with Affordable Housing Developers), the City intends to issue an RFQ and select a developer to build an affordable senior project, and will provide the following incentives to facilitate development:

- Flexible development standards (reduced parking requirements, modified setbacks, etc)
- Density bonuses
- City support in affordable housing funding applications (targeting those that support deeper targeting to ELI households)
- Deferral/Reduction in development fees, including waiver of any potential CUP fee
- Direct financial assistance through Housing Trust Fund
- Project entitlement assistance

Timeline: Initiate an RFQ process by the end of 2012, select a developer and pursue development of a senior housing project affordable to the City's lower and extremely low income seniors.

Funding Source for Administrative Costs: Departmental Budget

Funding Source for Development Cost: Housing Trust Fund

Responsible City Section: City Manager's Office, Community Development

Department

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***Imp 11.3 Senior Case Management Program***

The City contracts with Jewish Family Services to provide a comprehensive case management program to assist frail elderly residents to remain independent and in their homes.

The following continuum of supportive services are provided to seniors who are frail, economically needy, and/or socially isolated:

- Comprehensive assessment – In-home psycho-social assessment of functional abilities, health status, mental and cognitive abilities, support network, financial health, safety risks, eligibility for government benefits and other programs. The comprehensive assessment includes:
  - Development of an individual care plan – Identifies senior’s needs and associated services that will allow continued independence.
  - Service coordination – Coordination with appropriate services, including in-home care-workers, ERS, home delivered meals, assistance to obtain governmental benefits, arranging for other community based services, transportation assistance, and coordination of services with medical providers, family, and social supports.
  - Emergency Response Systems (ERS) – ERS are medical devices placed in a senior’s home and connected to a central emergency location.
  - Monitoring/ home visits: Social workers make regularly scheduled home visits to assure quality of services, and that changing needs are met.
- Additional Services: Information, referral and crisis intervention, consultation and advocacy, and assistance to families to further support the senior’s independent living.

Approximately 28 Beverly Hills seniors are served annually under the comprehensive case management program. In addition, Jewish Family Services provides broad case management services through the Beverly Hills Senior Center, including information, referral and crisis intervention, serving approximately 200 seniors per year.

Timeline: On-going

Funding Source: CDBG, City of Beverly Hills Community Assistance Fund

Responsible City Section: City Manager’s Office

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#### ***Imp 11.4 Senior Homesharing Program***

Alternative Living for the Aging (ALA) provides a free shared housing program which matches older people with others (younger and older) interested in sharing their homes. Housing counselors at ALA interview each potential roommate and obtain references, leaving the decision to the potential roommates whether to make a match. Sharing a home promotes independent living, provides additional income for the provider, an affordable rent for the seeker, and the potential for deeper relationships for both. The average age of community members in Beverly Hills is growing older, and over 750 seniors currently live alone in single-family homes in the City. Shared housing promotes the efficient use of the housing stock, and can help address the housing needs of seniors in our community. The City has provided funds to ALA in the past to help fund their roommate matching service, and anticipates the program will be funded again in future years when there are fewer budget constraints. Beverly Hills residents continue to have access to ALA's home sharing program.

Timeline: Evaluate Community Assistance Funds and determine grant amount annually.

Funding Source: City of Beverly Hills Community Assistance Grant Funds

Responsible City Section: Human Services Division, Community Services Department

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#### ***Imp 11.5 Accessible Housing***

Pursuant to Senate Bill 520, jurisdictions are required to analyze constraints to the development, maintenance, and improvement of housing for persons with disabilities, and take measures to remove constraints. As part of this Housing Element, Beverly Hills has conducted a review of zoning, building codes, and permit processing procedures, and while the City has not identified any institutional barriers to the provisions of accessible housing, the City does not have in place specific procedures for requesting reasonable accommodations. As a means of facilitating such requests and removing potential constraints for persons with disabilities, the City will develop and adopt written procedures for reasonable accommodation requests with respect to zoning laws, permit processing, and building laws. Procedures will specify who may request an accommodation, time frames for decision-making and specific modification provisions.

Timeline: By 2011, develop and adopt specific written procedures for reasonable accommodation requests, and inform and educate the public on the process of requesting an accommodation.

Responsible City Section: Community Development Department

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### ***Imp 11.6 Funding for Homeless Services***

Beverly Hills launched the CLASP (Changing Lives and Sharing Places) Homeless Outreach and Engagement Program in January 2008. The program provides street outreach workers (through Step Up On Second) to assess the needs of homeless individuals in the City, provide case management, and to refer them to the appropriate services and shelter. The CLASP program currently has 46 homeless people in the City on its active case management list. Shelter is offered through People Assisting The Homeless (PATH), funded by the City to provide approximately 1,000 shelter bed nights per year.

Through its Community Assistance Grant Program, the City funds a variety of service organizations that serve the homeless and persons at-risk of homelessness. These organizations/programs include the All Saints Homeless Assistance Program, the Westside Food Bank, the Los Angeles Free Clinic, and the Maple Mental Health Counseling Center.

Service Providers: Step Up on Second; PATH; various other service agencies

Timeline: Annual funding allocations

Funding Source: City of Beverly Hills Community Assistance Grant Funds; Community Development Block Grant

Responsible City Section: Human Services Division, Community Services Department

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## **12.0 Remove Governmental Constraints**

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### ***Imp 12.1 Zoning Text Amendments for Special Needs Housing***

As part of the governmental constraints analysis for the Housing Element update, the following revisions to Beverly Hills' Zoning Code have been identified as required under State law:

- Add a definition of "family" which is inclusive and non-discriminatory to the Code.
  - Add a "Community Care Facility" category and definition to the Code. List community care facilities with six or fewer occupants as permitted by-right in residentially zoned areas.
  - Permit Community Care Facilities with seven or more occupants with a conditional use permit in all multi-family residential zoning districts with a conditional use permit.
  - Add a Single-Room Occupancy (SRO) definition, use category, and development standards for SRO's to the Code. Permit SRO's with a conditional use permit within the multi-family residential R-4 zoning overlay district where congregate housing for elderly and disabled persons is allowed. Develop standards to regulate SROs.
  - Add a definition for Transitional Housing, and Supportive Housing to
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~~the Code and treat them as residential uses subject to the same requirements as other residential uses of the same type in the same zone and allow as a permitted use in the multi-family residential R-4 zoning overlay district where congregate housing for elderly and disabled persons is allowed subject to the same standards and permitting procedures as other residential uses, and without undue special regulatory requirements.~~

- Establish an Emergency Shelter definition and use category, and allow as a by-right, permitted use in the multi-family residential R-4 zoning overlay district where congregate housing for elderly and disabled persons is allowed. Shelters will be subject to the same development and management standards as other uses permitted in the specific zone. The City will develop written objective standards for emergency shelters to regulate the following as permitted under SB 2:
  - o The maximum number of beds/persons permitted to be served nightly;
  - o Off-street parking based on demonstrated need, but not to exceed parking requirements for other residential or commercial uses in the same zone;
  - o The size/location of exterior and interior onsite waiting and client intake areas;
  - o The provision of onsite management;
  - o The proximity of other emergency shelters, provided that emergency shelters are not required to be more than 300 feet apart;
  - o The length of stay;
  - o Lighting;
  - o Security during hours that the emergency shelter is in operation.

~~Timeline: Amend the zoning code by in 2012 (within one year of adoption of the Element) to make explicit provisions for a variety of special needs housing.~~

~~Funding Source: Departmental Budget~~

~~Responsible City Section: Community Development Department~~

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### ***Imp 12.2 Adjust Development Standards***

While the City's development standards are aimed at ensuring the quality of development, certain standards may have the effect of constraining the provision of certain housing types. The Housing Element constraints analysis identifies the City's minimum unit size as a disincentive to the construction of smaller, more affordable units for the City's workforce. In addition, the

Element identifies the City's height districts and parking location requirements as potential constraints to development. The City will commit to reducing its minimum unit size requirements, and will conduct an analysis of its multi-family development standards and establish measurable parameters to assess which other standards serve as an actual constraint to development of housing for a range of housing types. For those standards identified as a constraint, the City will implement revisions to mitigate, to include, but not limited to an evaluation of the following:

- Replacing the current density calculation for multi-family projects in the zoning code with a maximum floor area ratio
- Modifying development standards for single-lot projects
- Allowing greater flexibility in the type, and location of multi-family parking
- Allowing the same number of units to be rebuilt on properties which have more units than currently would be allowed
- Providing additional incentives for workforce housing over and above those contained in the provisions of the State Density Bonus.

Timeline: Conduct a comprehensive analysis of multi-family development standards in 2012. Amend the zoning code by 2013 to reduce minimum unit sizes and other development standards as supported by the analysis.

Funding Source: Departmental Budget

Responsible City Section: Community Development Department

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### ***Imp 12.3 Reduced Fees for Affordable Housing***

Beverly Hills collects various fees from development to cover the costs of processing permits and providing services and facilities. The City will evaluate the economic benefit of providing waivers or reductions of certain taxes, and fees including certain project fees for developments containing very low, low- and moderate-income housing units, including the Park and Recreation tax and the Dwelling Unit tax. In addition as well as for housing developed under the City's modified standards for Multiple-family Residences for Elderly and Handicapped Persons (Deed Restricted), the City will waive the CUP fee.

The California legislature passed AB 641 in 2007 which helps to address the cash flow problems inherent in many affordable housing projects during the construction phase. For affordable housing developments in which at least 49 percent of the units are affordable to lower income households, AB 641 prohibits local governments from requiring the payment of local developer fees prior to receiving a certificate of occupancy.

Timeline: Conduct fee study in 2012, and adopt modified development fees for affordable housing.

Funding Source: Departmental Budget

Responsible City Section: Community Development Department

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### ***Imp 12.4 Monitor the Development Review Process***

Beverly Hills has formed a Development Review Taskforce. Members of the Taskforce will review the City's development review processes, identify inefficiencies and uncertainties in the City's review, and promote alternative

techniques intended to streamline the process and to add greater levels of certainty in the development review process.

The City's Development Plan Review process for housing projects will be evaluated on a project-level basis to identify, and to the extent possible reduce any potential points of uncertainty in the process. All points in the review process will be evaluated; including application of the Development Plan Review findings, specifically Finding "B", which relates to a project's potential to promote harmonious development. This evaluation will be conducted in conjunction with the Annual Housing Element Report to HCD. Procedures will be modified as appropriate to assure certainty in the City Development Plan Review process.

Timeline: Annually, 2011 - 2013.

Funding Source: Departmental Budget

Responsible City Section: Community Development Department

### Quantified Objectives

Beverly Hills has developed the following numeric objectives for housing production, housing rehabilitation, and housing preservation based on the policies and programs set forth in the Housing Element.

<u>Income Group</u>	<u>New Construction</u>	<u>Rehabilitation</u>	<u>Conservation</u>
<u>Extremely Low</u>	<u>73</u>		<u>75</u>
<u>Very Low</u>	<u>73</u>	<u>110</u>	<u>75</u>
<u>Low</u>	<u>113</u>	<u>110</u>	
<u>Moderate</u>	<u>117</u>		
<u>Above Moderate</u>	<u>178</u>		
<u>Total</u>	<u>554</u>	<u>220</u>	<u>150</u>

The City has set forth objectives for housing production which meet the fair share planning targets assigned by SCAG. Therefore, the City's quantified housing construction objective mirrors the RHNA allocation of 554 units, including carry over from the prior planning period. Beverly Hills will work towards meeting its RHNA through development of entitled projects and new units on multi-family infill sites, through second units, and support of affordable housing through a new Housing Trust Fund.

Housing rehabilitation plays an important role in maintaining the quality of housing, preserving the overall quality of neighborhoods, and contributing to an overall higher quality of life. The City provides rehabilitation assistance through the Handyworker Program that provides minor repairs/improved security/mobility assistance for low income tenants and homeowners. The goal is to

serve approximately 40 very low and low income households annually, or 220 over the planning period.

With respect to housing conservation, the City currently does not have any publicly assisted rental units that are at high risk of conversion to market rates. The City's goal will be to continue to coordinate with the non-profit owner of the 150 units of senior rental housing to maintain long term affordability.

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## **Appendix A - Housing Sites Inventory**

The State requires jurisdictions to identify sites for the development of housing within the planning period. The State also requires jurisdictions to inventory those sites and demonstrate that the sites identified are sufficient to accommodate the jurisdictions share of the regional housing need for all income levels (Regional Housing Need Allocation). Land suitable for residential development includes:

### State Potential Housing Site Categories

- Vacant land zoned for residential use
- Vacant land zoned for nonresidential use that allows residential use
- Underutilized residential sites capable of being developed with more residential units
- Sites zoned for nonresidential use that can be redeveloped for residential use

When the City released its draft housing element on November 19, 2010 the housing inventory included the following three inventories:

### Housing Site Categories Included in The Beverly Hills' Housing Element

- Vacant residential land
- Rezoned nonresidential land
- Underutilized residential sites

The City's original sites inventory took into consideration all parcels which had a potential for redevelopment during the planning cycle (2006-2013). Based on review of past development trends, the City feels that single-lot, and multiple-lot housing projects are common enough to consider both in the housing inventory. However, doing so would not address the State's concern that the City's housing sites inventory did not include project sites at a density sufficient enough to support affordable housing projects. The State indicated that "assisted housing developments utilizing State or federal financial resources typically include 50-80 units" in a letter dated January 21, 2011.

To address the State's concern that adequate large sites for housing exist in the City, the housing inventory was revised to:

### City's Revised Housing Sites Inventory

- Identify and include only sites consisting of two or more parcels.

- Calculate residential unit density as 85-percent of allowable zoning density based on the number of parcels that can be assembled (the initial inventory calculated densities only at the lower zoning density for single lot redevelopment).
- Identify existing uses on each site (only properties with four or fewer units were considered).
- Visually display properties that can be assembled, and includes calculations for total acres and units.

How the City developed its housing sites inventory and the process taken is presented in the following section.

### **Data Sources and Baseline Information**

1. **Base Information** for all properties in the Multi-Family Residential areas of the City on March 25, 2009. Any land use changes that occurred from January 1, 2009 to January 1, 2010 were updated in the dataset based on the City's building records; therefore building information for all Multi-Family Residential areas in the City is current in the survey as of January 1, 2010.

- i. **Data** was provided by Realquest. Realquest is a third-party information provider. Realquest's data is derived from the Los Angeles County Assessor's Office, and is updated monthly.

Realquest's building information included the following:

- a) Assessor's Parcel Number (APN)
- b) Address
- c) Size of parcel (square feet)
- d) Date of original construction/ Date of major renovation
- e) Number of units

- ii. **Base Parcel Map** of all properties in the City was provided by the Los Angeles County Assessor's Office. The parcel map obtained is current to January 1, 2009.

The Real Quest data was linked to the map as follows:

- a) The Realquest data was successfully linked, by APN, to the Los Angeles County Assessor's Office data in ESRI's ArcGIS software with no mismatches.
- b) The lack of mismatches indicates that the APN's, and therefore, the Realquest data was accurately matched to its respective property on the County's parcel map (ESRI Shapefile format).

2. **General Plan/ Zoning Information Added** to the base information data using ESRI's ArcGIS. The general plan and zoning information included:

**General Plan Density** (Residential Units/ Acre, maximum building height.)

- a) MFR, High-Density (50 du/ac, 60 feet)
- b) MFR, Medium-Density (45 du/ac, 60 feet)
- c) MFR, Low-Medium (40 du/ac, 40 feet)
- d) MFR, Low (40 du/ac, 30 feet)
- e) MFR, Very Low (22 du/ac, 33-45 feet)

**Zoning Density** (Residential Units/ Square Foot). Only R-4 zoned properties were considered. Zoning unit density for properties were calculated based on the following criteria:

Zoning Density Category (BHMC: 10-3-2801)

A. Within 170 feet of Single-family Residential Properties:

Street Width <sup>35</sup> of Project Site (feet)	Density (Units / Square Feet)
Less than 60' <sup>36</sup>	1/ 1,700
60'to 120'	1/ 1,450
120'or greater	1/ 1,200

B. Fronting on Streets less than 34 feet in width:

Street Width of Project Site (feet)	Density (Units / Square Feet)
Less than 60'	1/ 1,500
60'to 120'	1/ 1,200
120'or greater	1/ 1,000

C. All others

Street Width of Project Site (feet)	Density (Units / Square Feet)
Less than 60'	1/ 1,300
60'to 120'	1/ 1,100
120'or greater	1/ 900

<sup>35</sup> **Street Widths.** Zoning Unit Density is calculated based on the width of the street. The definition for Street Width is given in the Subdivision Ordinance of the Beverly Hills Municipal Code (BHMC 10-2-101: Words Defined) as "the distance between property lines".

<sup>36</sup> **Typical Multi-family lots are 55'-60' in width.** So a project site less than 60' in width is a single lot, a project site between 60' and 120' is a two lot site, and project sites greater than 120' are three-plus lot sites.

### **Identification of Housing Sites**

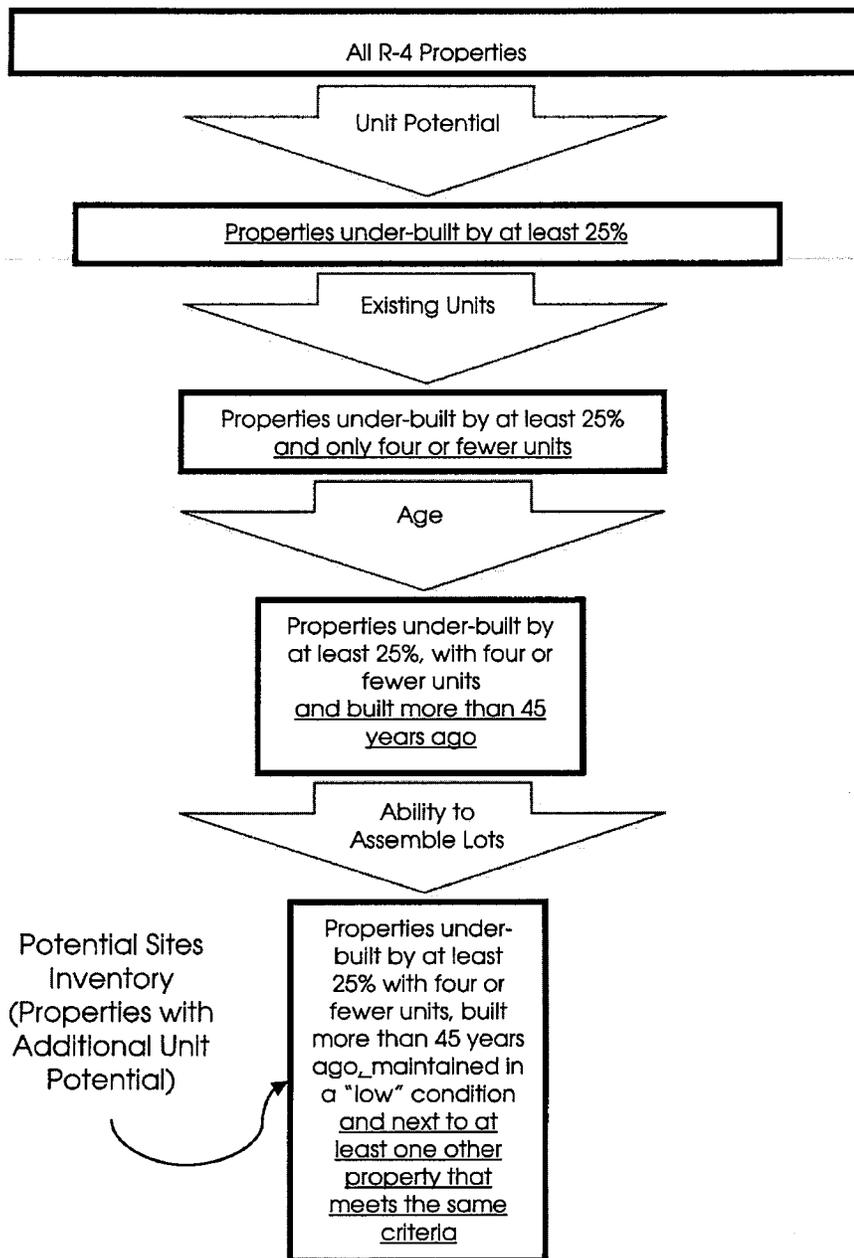
All R-4 multi-family properties in the City were inventoried. The results of the survey are presented in the tables following this section, which is arranged by the State category of housing site type (vacant, rezoned, and underutilized). Properties were identified as potential housing sites only if they met the following criteria:

- **Table 57 Vacant Properties** - All vacant R-4 properties are included. The city has a total of 13 vacant parcels. These properties are unique in that no demolition would be required in advance of redevelopment.
- **Table 58 Rezoned Properties** - All nonresidential zoned properties that were rezoned to residential uses are included in this chart. One of these projects includes affordable units (10% of entitled units, moderate). Three other projects include money for the City's future affordable housing trust fund (\$4.85 Mil.).
- **Table 59 Underutilized Properties** - Underutilized multi-family properties were identified that met the following criteria:
  - **Zoned R-4 Multi-family Residential** - Only R-4 zoned properties were included in the survey
  - **Unit Potential** - The above properties were further refined by extracting only properties that were under-built by at least 25-percent
  - **Existing Units on Site** - The above properties were further refined by extracting only properties with fewer than four units
  - **Age of existing structure** - The above properties were further refined by extracting only properties that were constructed more than 45 years ago
  - **Quality of upkeep** - The above properties were further refined by extracting only properties that were maintained in a poor condition based on visual surveys using the following criteria:
    - **High** - property is maintained in excellent condition, buildings are freshly painted, all windows appear to be functioning, balconies and staircases are not leaning, and there doesn't appear to be any maintenance needs.
    - **Medium** - property is maintained in an acceptable condition, paint is acceptable, windows are functioning, balconies and staircases are not leaning, there doesn't appear to be any maintenance needs.
    - **Low** - property is not being maintained well, paint is flaking, windows may not be functioning, balconies and staircases have a noticeable lean, the buildings are in need of maintenance.

- o Potential to Assemble Properties - The above properties were further refined by extracting only properties where at least two properties meeting all of the above criteria were located side by side.

The process followed to identify underutilized sites described above is representing in the following diagram:

**Flow Chart Depicting the Identification of Under Utilized Housing Sites**



City of Beverly Hills General Plan  
2008 - 2014 Draft Housing Element Update

Table Potential Sites Inventory - VACANT PROPERTIES (Zoned R-4)					
AIN	Acres	General Plan	General Plan Density (Units/Ac)	Zoning Density Category	Unit Potential (85% of Zoning Density)
4342035013					
4342035014					
4342035015					
4342035016	0.70	MFR Hi Density	50	C	30
4342035017					
4342035018					
4342035019					
4342035020					
4331023033	0.28	MFR Med Density	45	B	9
4331023034					
4333016059	0.45	MFR Low Density	40	A	17
4343003004	0.17	MFR Low-Med	40	B	6
4331015023	0.14	MFR Low-Med	40	B	5
4332004037	0.30	MFR Med Density	45	C	11
4332004038					
<b>Totals</b>	<b>2.04</b>	<b>6 Sites</b>			<b>78 Units (85% of Zoning Density)</b>

Table Potential Sites Inventory - REZONED PROPERTIES (Rezoned between 2005 - 2008)						
AIN	Acres	General Plan Land Use Designation	Density (Units/Ac)	Zoning Designation	Units Entitled	
4327028001	8.88	Beverly Hilton Specific Plan (9876 Wilshire)	12	Beverly Hilton Specific Plan	110	
4343013031	1.47	SP Mixed Use (402 Beverly)	17	Beverly Gardens Specific Plan	25 <sup>^</sup>	
4327028002	7.62	9900 Wilshire Specific Plan (9900 Wilshire)	31	9900 Wilshire Specific Plan	235	
4333018032	0.60	Mixed Use # 2 (8600 Wilshire)	39	M-PD-3	23	
4333018033						
4333018034						
4331018023	1.0	Mixed Use (9200 Wilshire)	58	M-PD-4	54	
4331018024						
4331018025						
4334014045	0.39	Commercial	93	C-3(AR) Adaptive Reuse Overlay	36 <sup>^^</sup>	
<b>Totals</b>	<b>19.96</b>	<b>5 Sites</b>			<b>483 Units (61 Units Constructed 422 Units entitled)</b>	

<sup>^</sup> Beverly Gardens Specific Plan has been constructed

<sup>^^</sup> Conversion of an existing office building to residential apartments, completed

Table 59. Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
								40.6	733	1815	1082	977	725
<b>Prefix "North"</b>													
<b>ALMONT</b>													
<b>Eastside of Street</b>													
4335022014	Quadruplex	MFR Medium Density	45	R-4	B	1935	0.13						
4335022015	Duplex	MFR Medium Density	45	R-4	B	1926	0.13						
4335022016	Quadruplex	MFR Medium Density	45	R-4	B	1931	0.13						
4335022017	Duplex	MFR Medium Density	45	R-4	B	1942	0.13	0.53	12	24	12	12	8
4335029018	Triplex Single Family	MFR Medium Density	45	R-4	B	1928	0.13						
4335029019	Home	MFR Medium Density	45	R-4	B	1948	0.13	0.26	4	12	8	6	5
4335029023	Single Family Home	MFR Medium Density	45	R-4	B	1939	0.13						
4335029024	Quadruplex	MFR Medium Density	45	R-4	B	1927	0.13	0.26	5	12	7	5	4
<b>Westside of Street</b>													
4335023006	Duplex	MFR Low-Medium	40	R-4	A	1930	0.13						
4335023007	Duplex	MFR Low-Medium	40	R-4	A	1925	0.13						
4335023008	Duplex	MFR Low-Medium	40	R-4	A	1931	0.13	0.39	6	15	9	12	9
<b>ARNAZ</b>													
<b>Eastside of Street</b>													
4334010043	Duplex	MFR Low Density	40	R-4	C	1938	0.15						
4334010044	Duplex	MFR Low Density	40	R-4	C	1929	0.15						
4334010045	Duplex	MFR Low Density	40	R-4	C	1934	0.15						
4334010046	Quadruplex	MFR Low Density	40	R-4	C	1927	0.15						
4334010047	Duplex	MFR Low Density	40	R-4	C	1934	0.15						
4334010048	Duplex	MFR Low Density	40	R-4	C	1948	0.15						
4334010049	Quadruplex	MFR Low Density	40	R-4	C	1930	0.15						
4334010050	Quadruplex	MFR Low Density	40	R-4	C	1928	0.15						
4334010051	Quadruplex	MFR Low Density	40	R-4	C	1937	0.15	1.34	26	54	28	40	30

Table Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
4334010053	Quadruplex	MFR Low Density	40	R-4	C	1926	0.15						
4334010054	Duplex	MFR Low Density	40	R-4	C	1935	0.15	0.30	6	12	6	7	5
<b>Westside of Street</b>													
4334008029	Duplex	MFR High Density	50	R-4	C	1928	0.15						
4334008030	Duplex	MFR High Density	50	R-4	C	1927	0.15						
4334008031	Duplex	MFR High Density	50	R-4	C	1928	0.15						
4334008032	Duplex	MFR High Density	50	R-4	C	1933	0.15						
4334008033	Duplex	MFR High Density	50	R-4	C	1934	0.14						
4334008034	Quadruplex	MFR High Density	50	R-4	C	1927	0.16						
4334008035	Duplex	MFR High Density	50	R-4	C	1929	0.15	1.04	16	50	34	35	27
<b>CLARK</b>													
<b>Eastside of Street</b>													
4334003031	Triplex	MFR Medium Density	45	R-4	C	1933	0.14						
4334003032	Duplex	MFR Medium Density	45	R-4	C	1934	0.14	0.28	5	12	7	7	5
4334004037	Quadruplex	MFR Medium Density	45	R-4	C	1928	0.15						
4334004041	Duplex	MFR Medium Density	45	R-4	C	1926	0.14						
4334004042	Quadruplex	MFR Medium Density	45	R-4	C	1941	0.14	0.28	6	12	6	6	4
<b>Westside of Street</b>													
4335029047	Duplex	MFR Medium Density	45	R-4	B	1928	0.13						
4335029048	Duplex	MFR Medium Density	45	R-4	B	1936	0.13						
4335029049	Duplex	MFR Medium Density	45	R-4	B	1934	0.13						
4335029050	Duplex	MFR Medium Density	45	R-4	B	1934	0.13	0.53	8	24	16	18	14
<b>DOHENY</b>													
<b>Westside of Street</b>													
4335006024	Quadruplex	MFR High Density	50	R-4	C	1938	0.16						
4335006037	Triplex	MFR High Density	50	R-4	C	1935	0.16	0.32	6	16	10	7	5

Table 59 Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
<b>GALE</b>													
<b>Westside of Street</b>													
4334022074	Duplex	MFR High Density	50	R-4	C	1932	0.15						
4334022075	Duplex	MFR High Density	50	R-4	C	1935	0.12	0.27	4	13	9	7	5
<b>HAMILTON</b>													
<b>Eastside of Street</b>													
4334022051	Duplex	MFR High Density	50	R-4	C	1926	0.15						
4334022052	Duplex	MFR High Density	50	R-4	C	1928	0.15						
4334022053	Duplex	MFR High Density	50	R-4	C	1940	0.15						
4334022054	Triplex	MFR High Density	50	R-4	C	1939	0.15	0.60	9	28	19	21	17
<b>Westside of Street</b>													
4334021068	Triplex	MFR High Density	50	R-4	C	1946	0.15						
4334021069	Quadruplex	MFR High Density	50	R-4	C	1950	0.15						
4334021070	Duplex	MFR High Density	50	R-4	C	1937	0.15	0.45	9	21	12	14	11
<b>LA PEER</b>													
<b>Eastside of Street</b>													
4335021016	Duplex	MFR Medium Density	45	R-4	B	1932	0.13						
4335021017	Quadruplex	MFR Medium Density	45	R-4	B	1936	0.13						
4335021018	Triplex	MFR Medium Density	45	R-4	B	1940	0.13						
4335021019	Duplex	MFR Medium Density	45	R-4	B	1933	0.13						
4335021020	Duplex	MFR Medium Density	45	R-4	B	1934	0.13	0.66	13	30	17	16	12
4335029077	Duplex	MFR Medium Density	45	R-4	B	1936	0.13						
4335029078	Quadruplex	MFR Medium Density	45	R-4	B	1924	0.13						
4335029079	Duplex	MFR Medium Density	45	R-4	B	1934	0.13	0.39	8	18	10	10	7
4335029081	Duplex	MFR Medium Density	45	R-4	B	1935	0.13						
4335029082	Triplex	MFR Medium Density	45	R-4	B	1928	0.13						
4335029083	Duplex	MFR Medium Density	45	R-4	B	1948	0.13						
4335029084	Duplex	MFR Medium Density	45	R-4	B	1932	0.13	0.53	9	24	15	15	11

Table Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
<b>Westside of Street</b>													
4335019022	Quadruplex	MFR Medium Density	45	R-4	B	1927	0.13						
4335019023	Duplex	MFR Medium Density	45	R-4	B	1936	0.13						
4335019024	Duplex	MFR Medium Density	45	R-4	B	1940	0.13	0.39	8	18	10	10	7
4335022003	Duplex	MFR Medium Density	45	R-4	B	1935	0.13						
4335022004	Duplex	MFR Medium Density	45	R-4	B	1933	0.13						
4335022005	Duplex	MFR Medium Density	45	R-4	B	1936	0.13	0.39	6	18	12	12	9
4335029005	Duplex	MFR Medium Density	45	R-4	B	1926	0.13						
4335029006	Duplex Single Family	MFR Medium Density	45	R-4	B	1940	0.13						
4335029007	Home	MFR Medium Density	45	R-4	B	1954	0.13	0.39	5	18	13	13	10
<b>MAPLE Eastside of Street</b>													
4342033001	Quadruplex	MFR High Density	50	R-4	C	1937	0.16						
4342033002	Quadruplex	MFR High Density	50	R-4	C	1937	0.17	0.33	8	16	8	6	4
<b>OAKHURST Westside of Street</b>													
4342002022	Single Family Home	MFR High Density	50	R-4	C	1924	0.06						
4342002023	Single Family Home	MFR High Density	50	R-4	C	1924	0.06						
4342002024	Single Family Home	MFR High Density	50	R-4	C	1924	0.08	0.19	3	10	7	7	6
<b>SWALL Eastside of Street</b>													
4335029064	Quadruplex	MFR Medium Density	45	R-4	C	1929	0.13						
4335029065	Duplex	MFR Medium Density	45	R-4	C	1930	0.13						
4335029066	Duplex	MFR Medium Density	45	R-4	C	1930	0.15	0.41	8	19	11	13	10

Table 59 Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
<b>Westside of Street</b>													
4335021002	Triplex	MFR Medium Density	45	R-4	C	1926	0.13						
4335021003	Triplex	MFR Medium Density	45	R-4	C	1953	0.13						
4335021004	Triplex	MFR Medium Density	45	R-4	C	1954	0.13						
4335021005	Duplex	MFR Medium Density	45	R-4	C	1927	0.13						
4335021006	Duplex	MFR Medium Density	45	R-4	C	1925	0.13	0.66	13	30	17	20	15
4335029068	Quadruplex	MFR Medium Density	45	R-4	C	1931	0.13						
4335029069	Duplex	MFR Medium Density	45	R-4	C	1957	0.13	0.26	6	12	6	8	6
<b>Prefix "South"</b>													
<b>ARNAZ Eastside of Street</b>													
4333016001	Duplex	MFR Low Density	40	R-4	A	1934	0.13						
4333016002	Duplex	MFR Low Density	40	R-4	A	1938	0.11						
4333016028	Quadruplex	MFR Low Density	40	R-4	A	1940	0.15	0.40	8	16	8	7	5
4333016020	Duplex	MFR Low Density	40	R-4	A	1934	0.15						
4333016021	Quadruplex	MFR Low Density	40	R-4	A	1940	0.15						
4333016022	Quadruplex	MFR Low Density	40	R-4	A	1928	0.15	0.45	10	18	8	7	4
<b>Westside of Street</b>													
4333016034	Duplex	MFR High Density	50	R-4	C	1945	0.15						
4333016035	Duplex	MFR High Density	50	R-4	C	1929	0.15						
4333016038	Duplex	MFR High Density	50	R-4	C	1933	0.15						
4333016039	Triplex	MFR High Density	50	R-4	C	1931	0.15						
4333016040	Quadruplex	MFR High Density	50	R-4	C	1928	0.15						
4333016041	Quadruplex	MFR High Density	50	R-4	C	1929	0.15						
4333016057	Duplex	MFR High Density	50	R-4	C	1935	0.15	1.04	19	49	30	32	24

Table Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
<b>BEDFORD</b>													
<b>Eastside of Street</b>													
4328021014	Quadruplex	MFR High Density	50	R-4x2	C	1940	0.18						
4328021015	Duplex	MFR High Density	50	R-4x2	C	1949	0.18	0.35	6	18	12	9	7
4330015007	Duplex	MFR Low-Medium	40	R-4x1	A	1936	0.15						
4330015008	Duplex	MFR Low-Medium	40	R-4x1	A	1933	0.15						
4330015009	Duplex	MFR Low-Medium	40	R-4x1	A	1929	0.15						
4330015010	Duplex	MFR Low-Medium	40	R-4x1	A	1929	0.15						
4330015011	Duplex	MFR Low-Medium	40	R-4x1	A	1935	0.15						
4330015012	Duplex	MFR Low-Medium	40	R-4x1	A	1932	0.15						
4330015013	Duplex	MFR Low-Medium	40	R-4x1	A	1929	0.15						
4330015014	Duplex	MFR Low-Medium	40	R-4x1	A	1929	0.15						
4330015015	Duplex	MFR Low-Medium	40	R-4x1	A	1931	0.15						
4330015016	Duplex	MFR Low-Medium	40	R-4x1	A	1938	0.15						
4330015017	Duplex	MFR Low-Medium	40	R-4x1	A	1936	0.15	1.61	22	66	44	37	28
<b>Westside of Street</b>													
4328020010	Quadruplex	MFR High Density	50	R-4x2	C	1936	0.15						
4328020020	Quadruplex	MFR High Density	50	R-4x2	C	1929	0.18	0.32	8	16	8	6	4
4330011031	Duplex	MFR High Density	50	R-4x1	C	1927	0.15						
4330011032	Duplex	MFR High Density	50	R-4x1	C	1935	0.15	0.29	4	14	10	8	6
4330011036	Duplex	MFR High Density	50	R-4x1	C	1949	0.15						
4330011037	Duplex	MFR High Density	50	R-4x1	C	1929	0.15						
4330011038	Duplex	MFR High Density	50	R-4x1	C	1935	0.15						
4330011039	Duplex	MFR High Density	50	R-4x1	C	1950	0.15						
4330011040	Duplex	MFR High Density	50	R-4x1	C	1934	0.15						
4330011041	Duplex	MFR High Density	50	R-4x1	C	1930	0.15						
4330011044	Duplex	MFR High Density	50	R-4x1	C	1929	0.15						
4330011052	Duplex	MFR High Density	50	R-4x1	C	1947	0.15	1.17	16	56	40	41	32

Table 59 Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
<b>CAMDEN</b>													
<b>Westside of Street</b>													
4328026010	Single Family	MFR High Density	50	R-4x2	C	1957	0.15						
4328026017	Triplex	MFR High Density	50	R-4x2	C	1938	0.18						
4328026018	Quadruplex	MFR High Density	50	R-4x2	C	1953	0.18	0.50	8	25	17	17	13
<b>DOHENY</b>													
<b>Eastside of Street</b>													
4332006019	Triplex	MFR Low-Medium	40	R-4	A	1940	0.13						
4332006020	Duplex	MFR Low-Medium	40	R-4	A	1936	0.13						
4332006021	Duplex	MFR Low-Medium	40	R-4	A	1936	0.13	0.39	7	15	8	8	6
4332006024	Single Family	MFR Low-Medium	40	R-4	A	0	0.13						
4332006025	Duplex	MFR Low-Medium	40	R-4	A	1937	0.13	0.26	3	10	7	6	5
<b>Westside of Street</b>													
4331021001	Duplex	MFR Low-Medium	40	R-4	A	1929	0.14						
4331021002	Duplex	MFR Low-Medium	40	R-4	A	1936	0.13	0.27	4	11	7	5	4
4331022007	Duplex	MFR Low-Medium	40	R-4	A	1935	0.14						
4331022008	Duplex	MFR Low-Medium	40	R-4	A	1935	0.14						
4331022009	Duplex	MFR Low-Medium	40	R-4	A	1933	0.14	0.42	6	18	12	10	8
<b>ELM</b>													
<b>Eastside of Street</b>													
4331013040	Single Family	MFR Medium Density	45	R-4	B	1948	0.14						
4331013041	Quadruplex	MFR Medium Density	45	R-4	B	1929	0.14	0.28	5	12	7	6	4
<b>Westside of Street</b>													
4331010001	Duplex	MFR Low-Medium	40	R-4	A	1936	0.17						
4331010002	Duplex	MFR Low-Medium	40	R-4	A	1960	0.16	0.32	4	13	9	6	5
<b>GALE</b>													
<b>Eastside of Street</b>													
4333030033	Duplex	MFR High Density	50	R-4	C	1926	0.15						
4333030027	Quadruplex	MFR High Density	50	R-4	C	1952	0.15	0.30	6	14	8	7	5

Table Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
4333030037	Duplex	MFR High Density	50	R-4	C	1935	0.15						
4333030038	Duplex	MFR High Density	50	R-4	C	1926	0.15	0.30	4	14	10	9	7
4333030046	Quadruplex	MFR High Density	50	R-4	C	1930	0.19						
4333030014	Quadruplex	MFR High Density	50	R-4	C	1965	0.16	0.35	8	17	9	7	5
<b>Westside of Street</b>													
4333029003	Triplex	MFR High Density	50	R-4	C	1947	0.13						
4333029004	Duplex	MFR High Density	50	R-4	C	1935	0.13						
4333029005	Duplex	MFR High Density	50	R-4	C	1934	0.15						
4333029006	Quadruplex	MFR High Density	50	R-4	C	1926	0.15	0.57	11	28	17	17	13
4333029012	Quadruplex	MFR High Density	50	R-4	C	1935	0.15						
4333029013	Triplex	MFR High Density	50	R-4	C	1939	0.15	0.30	7	14	7	8	6
<b>HAMILTON</b>													
<b>Eastside of Street</b>													
4333029021	Duplex	MFR High Density	50	R-4	C	1935	0.12						
4333029022	Triplex	MFR High Density	50	R-4	C	1941	0.12	0.24	5	12	7	5	4
<b>Westside of Street</b>													
4333028009	Duplex	MFR High Density	50	R-4	C	1938	0.12						
4333028010	Duplex	MFR High Density	50	R-4	C	1935	0.12	0.24	4	12	8	6	5
4333028012	Duplex	MFR High Density	50	R-4	C	1936	0.12						
4333028013	Duplex	MFR High Density	50	R-4	C	1936	0.12	0.24	4	12	8	6	5
<b>LASKY</b>													
<b>Eastside of Street</b>													
4328006019	Quadruplex	MFR High Density	50	R-4	C	1935	0.15						
4328006020	Triplex	MFR High Density	50	R-4	C	1936	0.15	0.31	7	16	9	6	4
4328006022	Quadruplex	MFR High Density	50	R-4	C	1930	0.15						
4328007011	Triplex	MFR High Density	50	R-4	C	1933	0.15						
4328007012	Duplex	MFR High Density	50	R-4	C	1926	0.15						
4328007013	Duplex	MFR High Density	50	R-4	C	1928	0.15						
4328007014	Quadruplex	MFR High Density	50	R-4	C	1936	0.15	0.77	15	40	25	23	17

Table 59 Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
<b>MAPLE</b>													
<b>Westside of Street</b>													
4330034005	Duplex	MFR Medium Density	45	R-4	B	1946	0.14						
4330034006	Duplex	MFR Medium Density	45	R-4	B	1934	0.14	0.28	4	12	8	7	5
4330034008	Duplex	MFR Medium Density	45	R-4	B	1937	0.14						
4330034009	Quadruplex	MFR Medium Density	45	R-4	B	1930	0.14						
4330034010	Quadruplex	MFR Medium Density	45	R-4	B	1937	0.14	0.42	10	18	8	9	6
<b>OAKHURST</b>													
<b>Eastside of Street</b>													
4332004023	Duplex	MFR Medium Density	45	R-4	B	1926	0.12						
4332004024	Duplex	MFR Medium Density	45	R-4	B	1936	0.12	0.24	4	10	6	5	4
<b>Westside of Street</b>													
4332003007	Duplex	MFR Medium Density	45	R-4	B	1934	0.14						
4332003008	Triplex	MFR Medium Density	45	R-4	B	1949	0.14	0.28	5	12	7	6	4
<b>PALM</b>													
<b>Eastside of Street</b>													
4332003016	Duplex	MFR Medium Density	45	R-4	B	1940	0.19						
4332003017	Duplex	MFR Medium Density	45	R-4	B	1928	0.14						
4332003018	Single Family Home	MFR Medium Density	45	R-4	B	1926	0.14						
4332003021	Duplex	MFR Medium Density	45	R-4	B	1926	0.14						
4332003032	Duplex	MFR Medium Density	45	R-4	B	1933	0.14	0.75	9	33	24	11	8
<b>REEVES</b>													
<b>Eastside of Street</b>													
4331002027	Duplex	MFR Medium Density	45	R-4	B	1934	0.14						
4331002028	Quadruplex	MFR Medium Density	45	R-4	B	1959	0.14						
4331002029	Duplex	MFR Medium Density	45	R-4	B	1935	0.14	0.42	8	18	10	11	8
4331005027	Duplex	MFR Medium Density	45	R-4	B	1940	0.14						
4331005028	Quadruplex	MFR Medium Density	45	R-4	B	1929	0.14						
4331005029	Duplex	MFR Medium Density	45	R-4	B	1934	0.14	0.42	8	18	10	11	8

Table Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
<b>Westside of Street</b>													
4331004003	Quadruplex Single Family	MFR Medium Density	45	R-4	B	1928	0.14						
4331004004	Home	MFR Medium Density	45	R-4	B	1941	0.14						
4331004005	Duplex	MFR Medium Density	45	R-4	B	1942	0.14						
4331004006	Quadruplex	MFR Medium Density	45	R-4	B	1929	0.14						
4331004007	Duplex	MFR Medium Density	45	R-4	B	1934	0.14						
4331004008	Duplex	MFR Medium Density	45	R-4	B	1959	0.14	0.84	15	36	21	22	16
<b>REXFORD</b>													
<b>Eastside of Street</b>													
4330034022	Duplex	MFR Low-Medium	40	R-4	B	1938	0.14						
4330034023	Duplex	MFR Low-Medium	40	R-4	B	1932	0.14	0.28	4	12	8	7	5
4331014022	Duplex	MFR Low-Medium	40	R-4	A	1928	0.14						
4331014023	Duplex	MFR Low-Medium	40	R-4	A	1932	0.14						
4331014024	Duplex	MFR Low-Medium	40	R-4	A	1955	0.14						
4331014039	Quadruplex	MFR Low-Medium	40	R-4	A	1927	0.14	0.56	10	24	14	11	8
4331014029	Quadruplex	MFR Low-Medium	40	R-4	A	1929	0.14						
4331014030	Duplex	MFR Low-Medium	40	R-4	A	1926	0.14						
4331014031	Duplex	MFR Low-Medium	40	R-4	A	1929	0.14	0.42	8	18	10	8	6
4331014034	Quadruplex	MFR Low-Medium	40	R-4	A	1946	0.14						
4331014035	Duplex	MFR Low-Medium	40	R-4	A	1931	0.14						
4331014036	Quadruplex	MFR Low-Medium	40	R-4	A	1931	0.14						
4331014037	Triplex	MFR Low-Medium	40	R-4	A	1931	0.14	0.56	13	24	11	8	5
<b>Westside of Street</b>													
4330033007	Quadruplex	MFR Low-Medium	40	R-4	A	1936	0.14						
4330033008	Duplex	MFR Low-Medium	40	R-4	A	1927	0.14						
4330033009	Quadruplex	MFR Low-Medium	40	R-4	A	1929	0.14						
4330033010	Quadruplex	MFR Low-Medium	40	R-4	A	1929	0.14	0.56	14	24	10	7	4

Table 59. Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
4330033012	Triplex	MFR Low-Medium	40	R-4	A	1961	0.14						
4330033013	Quadruplex	MFR Low-Medium	40	R-4	A	1927	0.14						
4330033014	Duplex	MFR Low-Medium	40	R-4	A	1935	0.14	0.42	9	18	9	7	5
<b>ROXBURY</b>													
<b>Eastside of Street</b>													
4330011007	Duplex	MFR High Density	50	R-4x1	C	1929	0.15						
4330011008	Duplex	MFR High Density	50	R-4x1	C	1936	0.15						
4330011009	Duplex	MFR High Density	50	R-4x1	C	1932	0.15						
4330011010	Duplex	MFR High Density	50	R-4x1	C	1937	0.15						
4330011011	Duplex	MFR High Density	50	R-4x1	C	1930	0.15	0.73	10	35	25	10	7
4330011014	Duplex	MFR High Density	50	R-4x1	C	1934	0.15						
4330011018	Duplex	MFR High Density	50	R-4x1	C	1931	0.15						
4330011019	Quadruplex	MFR High Density	50	R-4x1	C	1940	0.15						
4330011047	Duplex	MFR High Density	50	R-4x1	C	1930	0.15	0.59	10	28	18	6	4
<b>SPALDING</b>													
<b>Eastside of Street</b>													
4328010019	Quadruplex	MFR Low-Medium	40	R-4	A	1936	0.14						
4328010020	Duplex	MFR Low-Medium	40	R-4	A	1930	0.15						
4328010021	Duplex	MFR Low-Medium	40	R-4	A	1933	0.15	0.45	8	18	10	9	6
4328010023	Duplex	MFR Low-Medium	40	R-4	A	1930	0.15						
4328010024	Duplex	MFR Low-Medium	40	R-4	A	1931	0.15						
4328010025	Duplex	MFR Low-Medium	40	R-4	A	1956	0.15						
4328010026	Duplex	MFR Low-Medium	40	R-4	A	1934	0.15						
4328010027	Duplex	MFR Low-Medium	40	R-4	A	1934	0.15						
4328010028	Duplex	MFR Low-Medium	40	R-4	A	1941	0.15						
4328010029	Triplex	MFR Low-Medium	40	R-4	A	1944	0.15						
4328010030	Quadruplex	MFR Low-Medium	40	R-4	A	1935	0.15						
4328010031	Quadruplex	MFR Low-Medium	40	R-4	A	1939	0.15						
4328010032	Duplex	MFR Low-Medium	40	R-4	A	1936	0.15						
4328010033	Duplex	MFR Low-Medium	40	R-4	A	1942	0.14	1.69	27	66	39	35	26

Table Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
4328011024	Duplex	MFR Low-Medium	40	R-4	A	1934	0.14						
4328011025	Duplex	MFR Low-Medium	40	R-4	A	1934	0.17						
4328011026	Quadruplex	MFR Low-Medium	40	R-4	A	1935	0.17						
4328011027	Quadruplex	MFR Low-Medium	40	R-4	A	1935	0.17						
4328011028	Duplex	MFR Low-Medium	40	R-4	A	1930	0.17						
4328011031	Duplex	MFR Low-Medium	40	R-4	A	1934	0.14	0.96	16	40	24	19	14
4330009014	Triplex	MFR High Density	50	R-4	C	1942	0.15						
4330009015	Triplex	MFR High Density	50	R-4	C	1950	0.16						
4330009016	Triplex	MFR High Density	50	R-4	C	1944	0.15	0.46	9	24	15	14	11
<b>Westside of Street</b>													
4328006004	Duplex	MFR High Density	50	R-4	C	1929	0.15						
4328006005	Duplex	MFR High Density	50	R-4	C	1930	0.15						
4328006006	Quadruplex	MFR High Density	50	R-4	C	1940	0.15						
4328006007	Duplex	MFR High Density	50	R-4	C	1937	0.15	0.62	10	32	22	13	10
<b>Prefix "West"</b>													
<b>OLYMPIC</b>													
<b>Southside of Street</b>													
4330011001	Triplex	MFR Low-Medium	40	R-4x1	C	1934	0.15						
4330011002	Quadruplex	MFR Low-Medium	40	R-4x1	C	1937	0.13						
4330011005	Duplex	MFR Low-Medium	40	R-4x1	C	1935	0.13						
4330011050	Duplex	MFR Low-Medium	40	R-4x1	C	1937	0.13	0.53	11	26	15	15	11
4330029001	Quadruplex	MFR Low-Medium	40	R-4	A	1936	0.14						
4330029002	Quadruplex	MFR Low-Medium	40	R-4	A	1936	0.14						
4330029026	Duplex	MFR Low-Medium	40	R-4	C	1941	0.15						
4330029027	Triplex	MFR Low-Medium	40	R-4	A	1936	0.14	0.56	13	24	11	10	7
4330030001	Quadruplex	MFR Low-Medium	40	R-4	A	1946	0.14						
4330030002	Quadruplex	MFR Low-Medium	40	R-4	A	1946	0.14						
4330030003	Quadruplex	MFR Low-Medium	40	R-4	A	1934	0.15	0.42	12	18	6	4	6

Table 59 Potential Sites Inventory - PROPERTIES WITH ADDITIONAL UNIT POTENTIAL

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Acres	Assembled Acreage	Existing Units on Site	Total Units Possible (General Plan)	Additional Units Possible (General Plan)	Additional Units Possible (Zoning Code)	Additional Units Possible (85% of Zoning Density)
<b>Northside of Street</b>													
4331010015	Duplex	MFR Low-Medium	40	R-4	A	1936	0.15						
4331010016	Quadruplex	MFR Low-Medium	40	R-4	A	1951	0.14						
4331010017	Duplex	MFR Low-Medium	40	R-4	A	1940	0.14						
4331010018	Quadruplex	MFR Low-Medium	40	R-4	A	1937	0.15						
4331010019	Triplex	MFR Low-Medium	40	R-4	A	1936	0.14	0.71	15	30	15	12	8
4331011016	Duplex	MFR Low-Medium	40	R-4	A	1960	0.14						
4331011017	Duplex	MFR Low-Medium	40	R-4	A	1935	0.14	0.42	4	14	10	9	7
<b>No Prefix</b>													
<b>DURANT</b>													
<b>Southside of Street</b>													
4328004011	Duplex	MFR High Density	50	R-4	C	1936	0.14						
4328004012	Triplex	MFR High Density	50	R-4	C	1937	0.14						
4328004013	Quadruplex	MFR High Density	50	R-4	C	1937	0.14						
4328004014	Quadruplex	MFR High Density	50	R-4	C	1937	0.14	0.55	13	28	15	14	10
<b>Northside of Street</b>													
4328002022	Duplex	MFR High Density	50	R-4	C	1940	0.13						
4328002023	Duplex	MFR High Density	50	R-4	C	1938	0.13	0.26	4	12	8	7	5
4328002028	Duplex	MFR High Density	50	R-4	C	1935	0.13						
4328002029	Triplex	MFR High Density	50	R-4	C	1940	0.10	0.23	5	11	6	5	4
<b>ROBBINS</b>													
<b>Southside of Street</b>													
4328005011	Quadruplex	MFR High Density	50	R-4	C	1938	0.16						
4328005012	Quadruplex	MFR High Density	50	R-4	C	1965	0.15	0.31	8	16	8	8	6
<b>SMITHWOOD</b>													
<b>Eastside of Street</b>													
4330027013	Quadruplex	MFR Low-Medium	40	R-4	A	1936	0.17						
4330027014	Triplex	MFR Low-Medium	40	R-4	A	1937	0.14						
4330027015	Triplex	MFR Low-Medium	40	R-4	A	1940	0.15	0.46	10	19	9	8	5
4330027018	Duplex	MFR Low-Medium	40	R-4	A	1933	0.15						
4330027020	Duplex	MFR Low-Medium	40	R-4	A	1940	0.15						
4330027021	Duplex	MFR Low-Medium	40	R-4	A	1950	0.15						
4330027022	Duplex	MFR Low-Medium	40	R-4	A	1928	0.15						
4330027023	Triplex	MFR Low-Medium	40	R-4	A	1929	0.15						
4330027024	Triplex	MFR Low-Medium	40	R-4	A	1935	0.17						
4330027026	Triplex	MFR Low-Medium	40	R-4	A	1936	0.15	1.07	17	43	26	23	17

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## Appendix B - Review of R-4 Housing Development

The following section provides additional analysis and discussion of the city's potential site inventory - specifically in relation to lot assembly, redevelopment potential, unit density of past development, and development potential of emergency shelters in the city's "multi-family congregate housing for elderly and disabled persons" overlay district.

### Past Multi-Family Housing Development

#### Analysis of Multi-Family Housing Development July 1, 2005 - July 1, 2010

Date	Address	Description	Number of Lots	Build/Approved Number of Units / % Allowable	Allowable Units (Zoning Density)	Prior Number of Units	% Underbuilt (Zoning Density)
Pipeline	432 N Oakhurst Dr	Condominiums	4	34 / 100%	34	26	76%
Pipeline	450 N Palm Dr	Condominiums	4	35 / 88%	40	30	75%
Pipeline	309 S Elm Dr	Condominiums	5	30 / 100%	30	25	83%
Pipeline	9200 Wilshire Blvd	Condominiums	5	54 / 100%	54	0*	n/a
Pipeline	9900 Wilshire Blvd	Condominiums	4	235 / 100%	235	0*	n/a
Pipeline	8600 Wilshire	Condominiums	3	23 / 100%	23	0*	n/a
Pipeline	9936 Durant Dr	Condominiums	2	13 / 93%	14	11	79%
Pipeline	154 N La Peer Dr	Condominiums	3	16 / 89%	18	2	11%
Pipeline	9601 Charleville Bl	Condominiums	3	23 / 85%	27	21	78%
Pipeline	9221 Whitworth Dr	Condominiums	1	8 / 89%	9	7	78%
2011	140 S Oakhurst Dr	Condominiums	2	11 / 92%	12	8	67%
2008	261 Reeves Dr	Condominiums	4	23 / 92%	25	22	88%
2007	558 Hillgreen	Condominiums	2	9 / 100%	9	8	89%
2007	225 S Hamilton Dr	Condominiums	5	25 / 100%	25	7	28%
2006	201 N Crescent Dr	Senior Housing	3	80 / 100%	80	0**	n/a
2006	313 Reeves Dr	Condominiums	2	10 / 83%	12	7	58%
2005	155 N Crescent Dr	Apartments	9	88 / 100%	88	0**	n/a

\* Property was rezoned from "Commercial - C-3" to "Residential - Mixed Use"

\*\* Property was a parking lot prior to development as housing

The city reviewed past multi-family development projects built or entitled between July 1, 2005 - July 1, 2010. This analysis we conducted to confirm the following:

- That the city's policies adequately incentivized assembly of lots
- That the threshold of "at least 25% underbuilt" in the city's potential sites inventory adequately represented past development potential
- That the city's projected unit density of 85% of zoning code density is consistent with past development densities.

Analysis indicates that multi-family residential development projects typically occur on at least two assembled lots. Of the ten projects that have been entitled in the city recently, only one project involves a single lot, and this particular lot is a corner lot with an alley. The adjacent property is a condominium building. Based on this review, the city's current incentives for lot assembly appear to be adequate.

Analysis also indicates that using the threshold of "at least underbuilt by 25%" adequately represents the development potential of lots in the city. In the past the city has seen redevelopment occur on properties that were built to almost 90% of the unit density allowable in the city's zoning code. The typical development site consists of two or more parcels side by side, each property having up to 4-5 units each. Based on review of past development practice, it is fair to assume that any property that is built to 75% of the zoning code density or less has a potential for redevelopment.

Lastly, this analysis indicates that assuming a unit density of 85% of zoning code density is consistent with past development densities. A separate analysis is included in the Housing Element in table 31 on page 78. This review further confirms the findings included in that chart and write up.

#### **Development Potential within the Multi-Family Congregate Housing for Elderly and Disabled Persons Overlay District**

The redevelopment potential in the city's Multi-Family Congregate Housing for Elderly and Disabled Persons Overlay District was surveyed using the same methodology used in analyzing the redevelopment in the city's Multi-Family Residential R-4 District. The chart on the next page presents the findings of that survey. The survey suggests there are six potential housing sites of at least two side-by-side lots, and that an approximate 536 units could result if all six potential sites were developed. Additionally, the survey suggests that there are two possible sites for development of more than 80 residential units. Additionally, existing buildings were surveyed, indicating that there are up to 60 existing units that could potentially be converted to emergency housing in the overlay zone.

The 2009 Homeless Count conducted by the Los Angeles Homeless Services Authority (LAHSA) indicated that on any given night of the year there are up to 42 homeless persons living in Beverly Hills. Based on the survey of the redevelopment potential in the Congregate Care Overlay Zone, there are adequate sites to locate an emergency shelter that would support the housing needs of the City's homeless population.

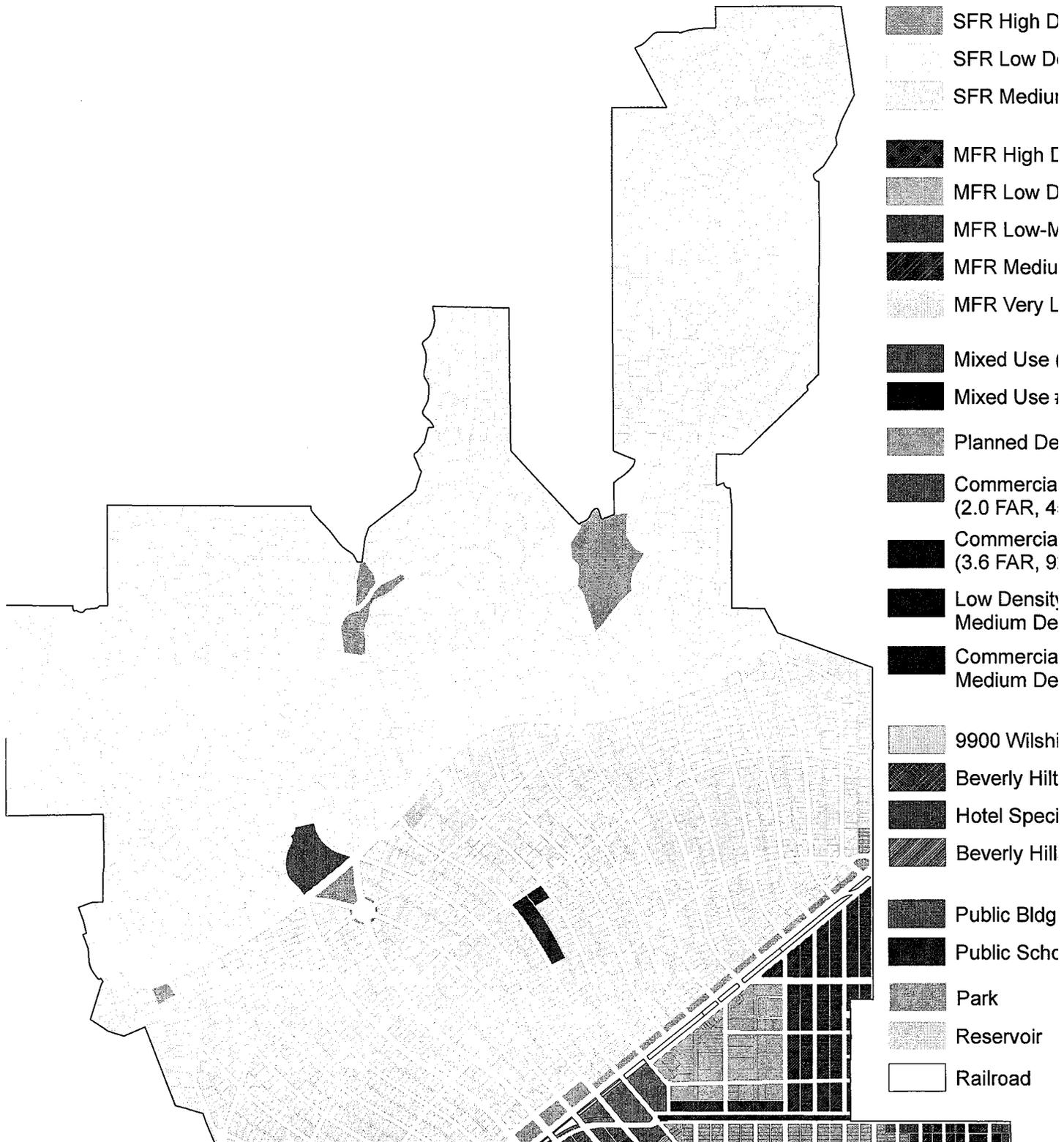
Potential Sites Inventory for the Multi-Family  
Congregate Care Housing for Elderly and Disabled Persons Overlay District

APN	Existing Use	General Plan Land Use Designation	General Plan Density	Zoning District	Zoning Density Category (A, B, or C)	Age of Structure	Existing Units	Acres	Assembled Acreage	Assembled Existing Units	Units Possible (Multi-Family Congregate Housing Overlay)			
<b>Prefix "North"</b>														
<b>ELM</b>														
<b>Eastside of Street</b>														
4331013040	Single Family Home	MFR Medium Density	45	R-4	B	1948	1	0.14	0.28	5	46			
4331013041	Quadruplex	MFR Medium Density	45	R-4	B	1929	4	0.14						
<b>GALE</b>														
<b>Eastside of Street</b>														
4333030033	Duplex	MFR High Density	50	R-4	C	1926	2	0.15	0.30	6	49			
4333030027	Quadruplex	MFR High Density	50	R-4	C	1952	4	0.15						
4333029012	Quadruplex	MFR High Density	50	R-4	C	1935	3	0.15	0.30	7	49			
4333029013	Triplex	MFR High Density	50	R-4	C	1939	4	0.15						
<b>REEVES</b>														
<b>Westside of Street</b>														
4331004003	Quadruplex	MFR Medium Density	45	R-4	B	1928	4	0.14	0.84	15	138			
4331004004	Single Family Home	MFR Medium Density	45	R-4	B	1941	1	0.14						
4331004005	Duplex	MFR Medium Density	45	R-4	B	1942	2	0.14						
4331004006	Quadruplex	MFR Medium Density	45	R-4	B	1929	4	0.14						
4331004007	Duplex	MFR Medium Density	45	R-4	B	1934	2	0.14						
4331004008	Duplex	MFR Medium Density	45	R-4	B	1959	2	0.14						
<b>No Prefix</b>														
<b>SMITHWOOD</b>														
<b>Eastside of Street</b>														
4330027013	Quadruplex	MFR Low-Medium	40	R-4	A	1936	4	0.17	0.46	10	76			
4330027014	Triplex	MFR Low-Medium	40	R-4	A	1937	3	0.14						
4330027015	Triplex	MFR Low-Medium	40	R-4	A	1940	3	0.15						
4330027018	Duplex	MFR Low-Medium	40	R-4	A	1933	2	0.15	1.07	17	177			
4330027020	Duplex	MFR Low-Medium	40	R-4	A	1940	2	0.15						
4330027021	Duplex	MFR Low-Medium	40	R-4	A	1950	2	0.15						
4330027022	Duplex	MFR Low-Medium	40	R-4	A	1928	2	0.15						
4330027023	Triplex	MFR Low-Medium	40	R-4	A	1929	3	0.15						
4330027024	Triplex	MFR Low-Medium	40	R-4	A	1935	3	0.17						
4330027026	Triplex	MFR Low-Medium	40	R-4	A	1936	3	0.15						
							<b>TOTALS</b>	<b>60</b>				<b>3.25</b>	<b>60</b>	<b>536</b>

# City of Beverly Hills - Land Use

## LAND USE DESIGNATION

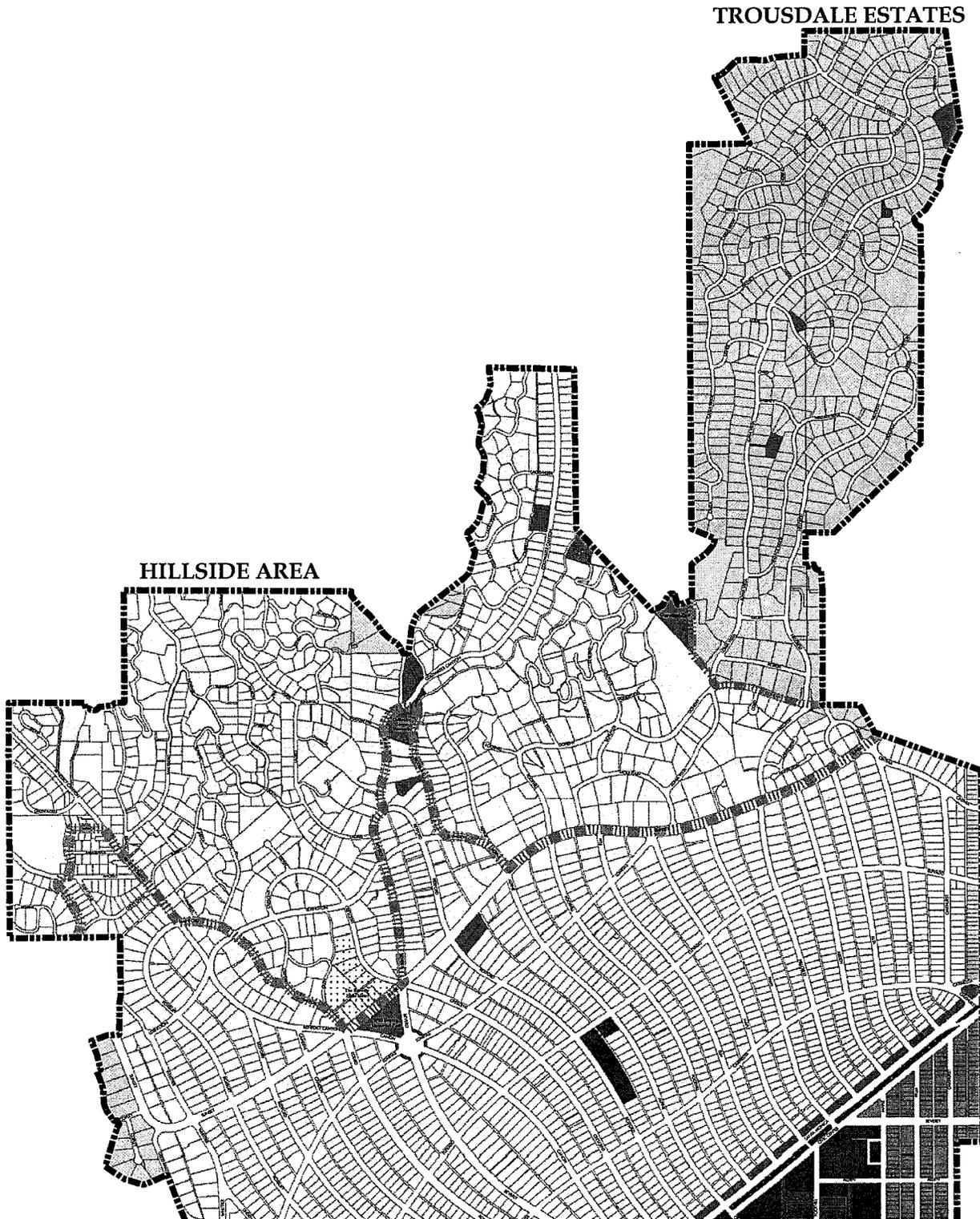
d/ac = Dwellings per acre





# City of Beverly Hills Zoning Map

Planning



**ZONES:**

**SINGLE-FAMILY RESIDENTIAL**

- R-1 One-Family Residential
- R-1.X One-Family Residential
- R-1.5X One-Family Residential
- R-1.5X2 One-Family Residential
- R-1.6X One-Family Residential
- R-1.7X One-Family Residential
- R-1.8X One-Family Residential

**MULTI-FAMILY RESIDENTIAL**

- R-3 Multiple Residential
- R-4 Multiple Residential
- R-4X1 Residential In
- R-4X2 Multiple Residential
- R-4-P Residential Pa
- RMCP Multiple-Fan

**COMMERCIAL**

- C-3 Commercial Zone
- C-3A Commercial Zone
- C-3B Commercial Zone
- C-3T-1 Commercial-
- C-3T-2 Commercial-
- C-3T-3 Commercial-
- C-5 Commercial Zone

**INSTITUTIONAL/GOVERNMENT**

- Church Zone
- P-S Public Service Zone
- S School
- T-1 Transportation 2
- Parks, Reservoirs, G

**SPECIFIC PLAN AREAS**

- 9900 Wilshire Specific
- Beverly Hills Garden
- Beverly Hills Hotel
- Beverly Hilton Specific
- C-3(AR) Adaptive R
- C-H(O) Commercial
- C-R Commercial-Re
- C-R-PD Commercial
- E-O-PD Entertainment
- M-PD-2 Mixed Use
- M-PD-4 Mixed Use
- T-O Transportation
- Area Boundary
- City Boundary

# MULTI-FAMILY CONGREGATE FOR ELDERLY AND DISABLED

## Gross Area

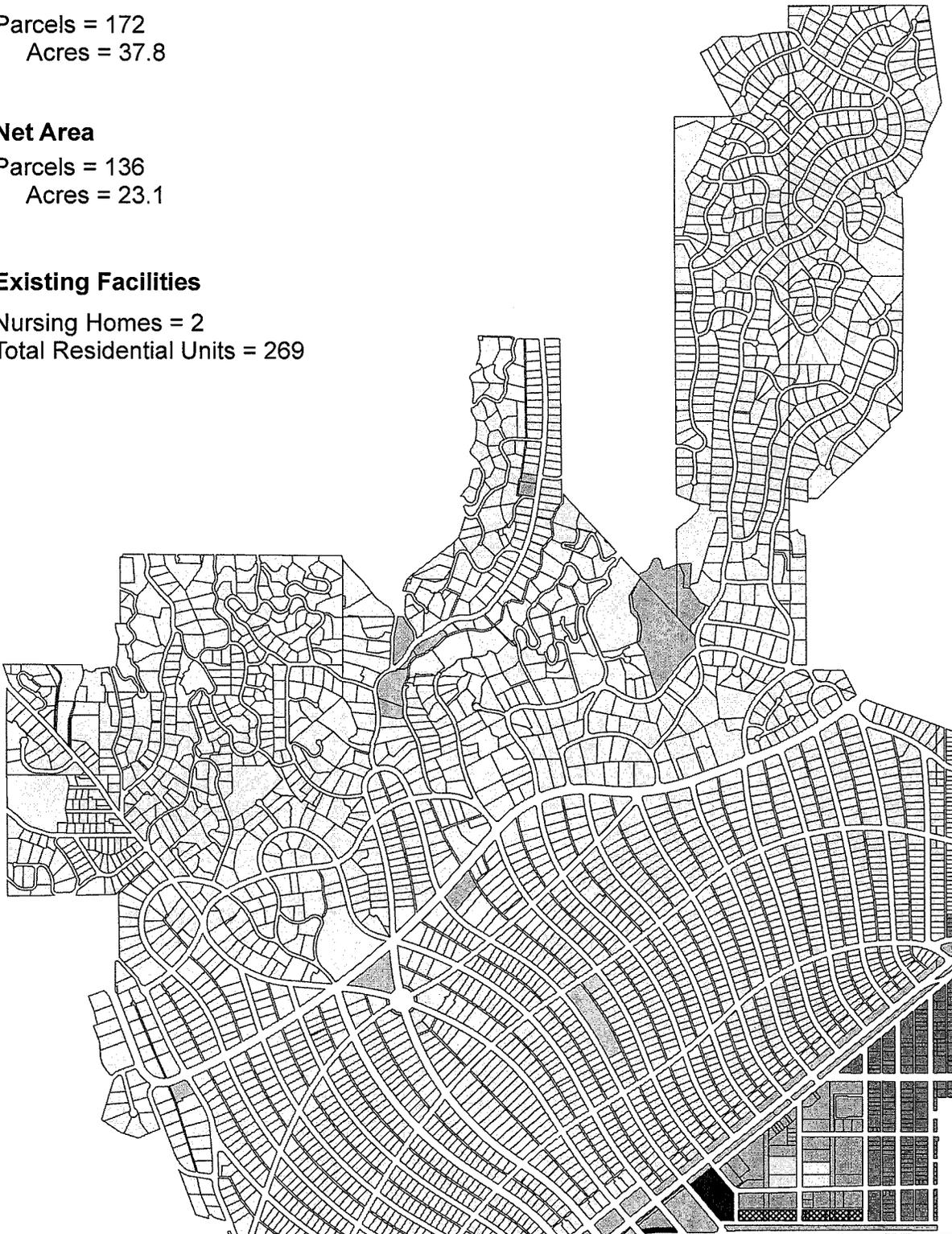
Parcels = 172  
Acres = 37.8

## Net Area

Parcels = 136  
Acres = 23.1

## Existing Facilities

Nursing Homes = 2  
Total Residential Units = 269



## Legend

 Multi-Fa  
Housing  
and Dis

## ZONE

-  C-3
-  C-3A
-  C-3T-1
-  C-3T-2
-  C-3T-3
-  C-5
-  R-1
-  R-1.5X
-  R-1.5X2
-  R-1.6X
-  R-1.7X
-  R-1.8X
-  R-1.X
-  R-3
-  R-4
-  R-4-P
-  R-4X1
-  R-4X2
-  RMCP
-  P-S
-  S
-  T-1
-  UNZONE
-  OPENSF