

4.10 PUBLIC SERVICES

INTRODUCTION

This section addresses the potential impact of the proposed Beverly Hilton Revitalization Plan on fire protection and emergency medical, police protection, school, recreational, and library services. Information included in this section was provided by the City of Beverly Hills Fire Department (BHFD), the City of Beverly Hills Police Department (BHPD), the Beverly Hills Unified School District (BHUSD), the Beverly Hills Recreation and Parks Department, and the Beverly Hills Public Library. Each section includes an introduction, methodology for the environmental impact analysis, existing conditions, regulatory setting, significance criteria, environmental impact analysis, mitigation measures, and adverse impacts discussions.

4.10.1 Fire Protection and Emergency Services

4.10.1.1 INTRODUCTION

This section describes the impact of The Beverly Hilton Revitalization Plan on existing and future fire protection and emergency services and facilities in the City of Beverly Hills due to the increase in the number of residents and the introduction of new multi-story structures.

4.10.1.2 METHODOLOGY

This section was prepared by evaluating the residential and structural components of the proposed project for its potential to increase demand on existing fire protection and emergency services and facilities. Information regarding existing services and facilities was obtained from the General Plan Update, Technical Background Report¹ and consultation with the Beverly Hills Fire Department.

4.10.1.3 EXISTING CONDITIONS

Staffing and Facilities

The Beverly Hills Fire Department (BHFD) provides comprehensive emergency services for the City of Beverly Hills, including fire, rescue, and emergency medical (paramedic) services, as well as fire prevention and code enforcement functions. The BHFD consists of three fire stations housing four engine companies, one truck company, two rescue ambulances, and various specialty response vehicles.² The fire department also has one Urban Search and Rescue Team that utilizes on-duty personnel. A daily contingent of 25 firefighter personnel is on duty at all times with a combined staff of 75 fire suppression officers and 7 administrative personnel.³ Based on a January 1, 2006 population estimate for Beverly Hills provided by the State Department of Finance of 35,813 residents, the ratio of firefighters to residents in the City presently stands at approximately 2.1 firefighters per 1,000 residents.

The BHFD has three fire stations that have primary responsibility for providing fire protection and emergency medical services to the City. The equipment and personnel at each of these facilities is summarized in Table 4.10.1-1, and the locations of these stations in relation to the project site are shown in Figure 4.10.1-1. Fire Station No. 1, located at 445 North Rexford Drive is located nearest the proposed

¹ *City of Beverly Hills General Plan Update, Technical Background Report*, Chapter 6, Community Health and Safety, prepared by EIP Associates in association with Kaku Associates, Inc. and Keyser Marston Associates, Inc., October 2005. The report is available for review at the City of Beverly Hills, Community Development and Planning Department and online at the City website, www.beverlyhills.org.

² *City of Beverly Hills General Plan Update, Technical Background Report*, Table 6.7-1, p. 6-68.

³ Communication with Fire Marshal Tim Scranton, City of Beverly Hills Fire Department, December 7, 2006.

project site with a traveling distance of 1.1 miles. The City of Beverly Hills has mutual aid agreements with the City of Los Angeles and the County of Los Angeles. The City has no plan to establish additional fire stations within the City. The BHFD recently purchased two new ambulances, one command vehicle, and one utility pickup to replace older vehicles. The City also seeks to replace one fire prevention van and one fire prevention sedan.⁴

Statistics and Response Times

The Insurance Service Organization (ISO) has developed a point system that evaluates a community's fire suppression delivery system, including dispatch service, staff and facilities, and fire hydrant water supply. The BHFD is designated Class 1 (highest) by the ISO.⁵ In 2005, the BHFD reported a total of 6,277 incidents, which is likely higher than the actual number of incidents that took place within the City.⁶ On average the BHFD receives approximately 5,300 to 5,500 calls for service per year. Approximately 50 percent of these calls are for medical emergencies and 50 percent are for fires, fire alarms, false alarms, and assistance with non-medical emergencies.⁷ Based on a total of 6,277 incidents, this equated to approximately 176 incidents per 1,000 residents in 2005.⁸ Alternatively, based on the average total of 5,400 incidents, this would equate to 151 incidents per 1,000 residents. Other types of reported incidents included hazardous conditions standby, bomb scares, physical rescues, and false alarms. Response times, the time between when a call is received and the first unit arrives, average 4.0 minutes for a fire engine company and 3.5 minutes for an ambulance.⁹

The BHFD considers existing service, including staffing, facilities and response times, to be adequate.¹⁰ The BHFD has achieved the highest level of public protection, the Class 1 ISO fire rating, by maintaining a pro-active approach to fire protection and emergency services.

⁴ Communication with Captain Craig Reinhardt, BHFD, December 8, 2006.

⁵ *City of Beverly Hills General Plan Update, Technical Background Report*, p. 6-70. ISO collects information on municipal fire-protection efforts in communities throughout the United States. In each of those communities, ISO analyzes the relevant data using their Fire Suppression Rating Schedule (FSRS). They then assign a Public Protection Classification from 1 to 10. Class 1 represents exemplary public protection, and Class 10 indicates that the area's fire-suppression program doesn't meet ISO's minimum criteria.

⁶ In 2005 the BHFD switched from one records management system to another. In doing so, some of the calls were entered into both systems during an overlapping period of time. As a result, an unknown number of incidents were double-counted.

⁷ Communication with Captain Craig Reinhardt, BHFD, December 7, 2006.

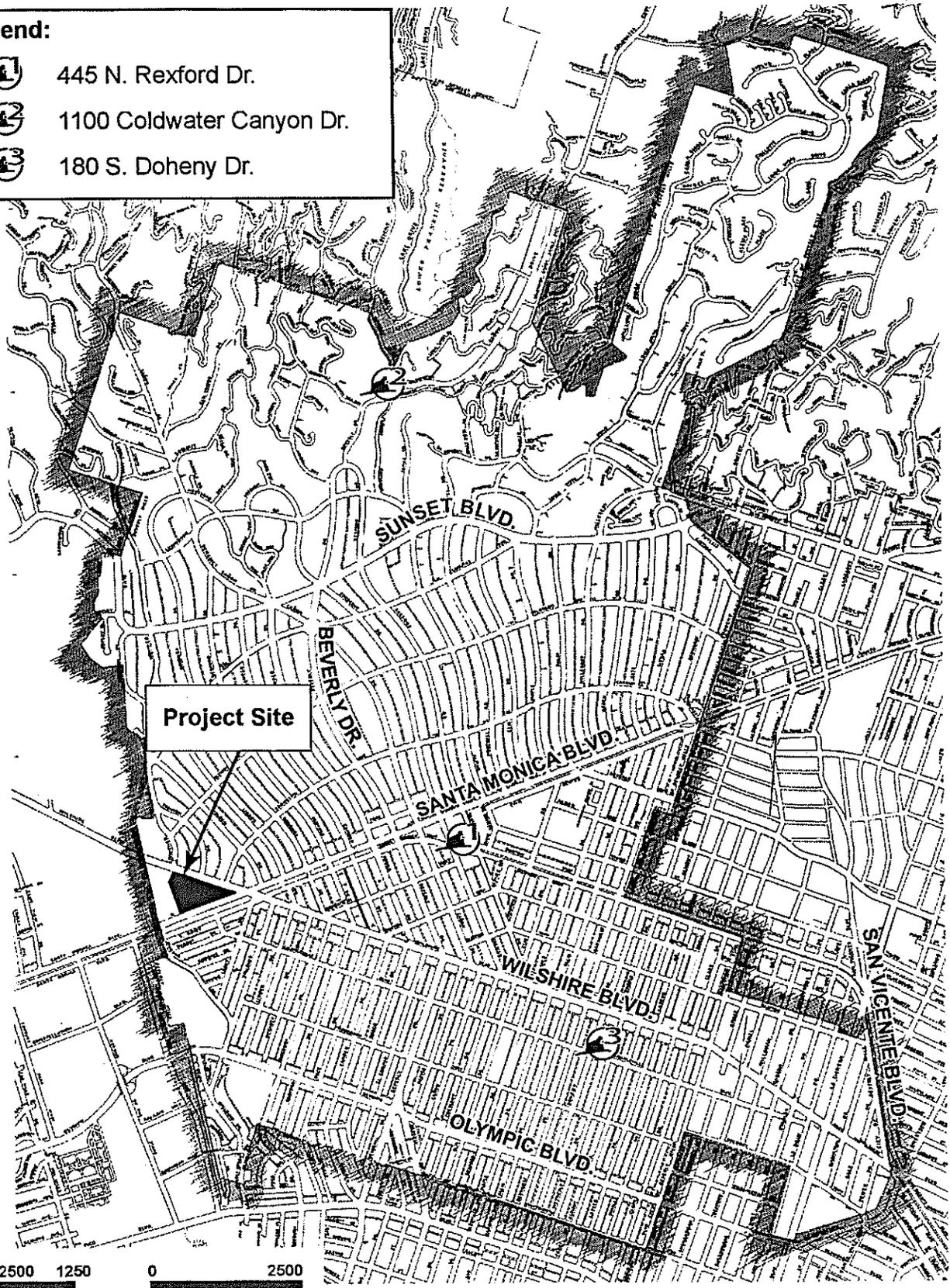
⁸ Calculation is based on the January 1, 2005 population of 35,754, provided by the Department of Finance.

⁹ *City of Beverly Hills General Plan Update, Technical Background Report*, p. 6-69.

¹⁰ Communication with Deputy Fire Marshal Gregory Barton, Beverly Hills Fire Department, February 15, 2007.

Legend:

-  445 N. Rexford Dr.
-  1100 Coldwater Canyon Dr.
-  180 S. Doheny Dr.



2500 1250 0 2500

APPROXIMATE SCALE IN FEET

SOURCE: City of Beverly Hills, Department of Public Works – 1997, Impact Sciences, Inc. – February 2007

FIGURE 4.10.1-1

**Table 4.10.1-1
Fire Protection and Emergency Services Stations and Equipment**

Station Number	Location	Distance From Site	Equipment
1	445 N. Rexford Drive	1.1 miles	Engine No. 1 and No. 5 (+1 reserve); Truck No. 4 (+1 reserve); Paramedic Rescue Ambulance No. 1 and No. 2 (+2 reserve); Command Vehicle (+1 reserve)
2	1100 Coldwater Canyon Drive	1.8 miles	Engine No. 2 (+1 reserve)
3	180 S. Doheny Drive	1.5 miles	Engine No. 3 (+1 reserve)

Sources: City of Beverly Hills General Plan Update, Technical Background Report, Table 6.7-1, p. 6-68.
City of Beverly Hills Website, www.beverlyhills.org.

Fire Flow

Fire hydrants No. 339, No. 340, No. 341, No. 342, and No. 343, which are located along Wilshire Boulevard, are identified as those serving the project site. Based on the most recent flow tests conducted in 2000, each hydrant exhibits a flow of approximately 1,000 to 1,500 gallons per minute with a residual pressure of 68 to 70 pounds per square inch (psi). An 8-inch water main, fed by 10-inch and 12-inch lines, beneath Wilshire Boulevard supply water to the hydrants.¹¹

The area within the City north of Sunset Boulevard has been designated a Very High Fire Hazard Severity Zone (VHFHSZ). This area is most susceptible to potential wildfires. The project site is not located within the VHFHSZ. However, structure-to-structure fire spread may expose areas south of Sunset Boulevard to any wildfires. Historically, wildfires within the City have been infrequent. The only wildfire that spread within City limits occurred on August 7, 1929.¹²

4.10.1.4 REGULATORY SETTING

The project is required to comply with Title 24 of the California Code of Regulations. Title 24 contains the California Fire Code (Part 9), which incorporates fire codes and safety standards published by the International Fire Code Institute and supplements the Federal Uniform Fire Code. Provisions of the code that pertain to the proposed project include minimum fire flow requirements, fire department access, sprinkler and fire alarm systems, and standpipe locations. Additionally, the proposed project is required

¹¹ Communication with Kevin Watson, Water Operations Manager, Department of Public Works, February 21, 2007.

¹² City of Beverly Hills General Plan Update, Technical Background Report, p. 6-36.

to comply with the California Health and Safety Code, which includes regulations for fire protection devices, such as smoke alarms and fire extinguishers and high-rise building standards.

The proposed project is required to comply with Beverly Hills Municipal Code ordinances governing fire safety. Chapter 2, Sections 1003.2.1 and 1003.2.1.1, contains regulations for fire sprinkler installation in new and existing buildings and Section 1503.4 requires all roof coverings to be fire retardant Class A by July 1, 2013.

4.10.1.5 SIGNIFICANCE CRITERIA

Impacts to fire protection and emergency services in the City would be considered significant if the proposed project results in either of the following:

- FIRE-1 Increase in demand for the level of fire protection and emergency services that would reduce the level of protection or emergency services; and/or
- FIRE-2 Creation of demand for additional fire stations, department personnel, and/or equipment.

4.10.1.6 ENVIRONMENTAL IMPACT ANALYSIS

- FIRE-1 *Would the project increase demand for the level of fire protection and emergency services that would reduce the level of protection or emergency services?*

Construction Impacts

Construction of the proposed project would involve demolition of several buildings and structures including the Palm/Oasis Court, the Cabana/Lanai Rooms, the one-story "Wilshire Edge" building containing the conference center and offices, the parking structure, and the former Trader Vic's restaurant and adjacent surface parking lot. New buildings and structures proposed as part of the project include two condominium buildings, The Waldorf Astoria Hotel building, and subterranean parking. The existing Wilshire Tower would be retained with only minor upgrades and renovations. During construction, large amounts of wood framing would be erected on the project site. In association with the framing operations, electrical, plumbing, communications, and ventilation systems would be installed. Although rare, fires do occur at construction sites. Construction of all electrical, plumbing, and mechanical systems are subject to City codes and are subject to inspection by City inspectors. In addition, construction sites are subject to Beverly Hills Public Works Department and BHFD standards related to water availability and fire department and fire fighting equipment accessibility standards. Adherence to existing City codes and requirements during construction would reduce fire hazards during construction, and construction-related fire hazard impacts are anticipated to be less than significant.

Project construction would increase traffic on and adjacent to the project site during working hours because commuting construction workers, trucks, and other large construction vehicles would be added to normal traffic during buildout of the project. Slow-moving construction traffic on local roadways may temporarily reduce optimal traffic flows and could conceivably delay emergency vehicles traveling through the area.

The BHFD has indicated that it does not expect the project to impact its level of service in the project area during construction.¹³ Furthermore, a City-approved Construction Management Plan, included as Mitigation Measure MM-TRAFFIC-5 in Section 4.11, **Transportation, Traffic, Parking, and Circulation**, would be implemented and would reduce the potential for conflicts between construction activities and traffic in the project area. The Construction Management Plan would address fire safety, emergency access, construction equipment staging and worker vehicle parking, and construction traffic controls. With implementation of the Construction Management Plan, it is expected that the BHFD would maintain adequate levels of service to both the project site and surrounding land uses during the construction; therefore, impacts to fire protection services are anticipated to be less than significant during construction.

Operational Impacts

With the introduction of 120 new residential units, new buildings exceeding the height of the existing Wilshire Tower, and an approximately 79 percent net increase in building square footage, it is anticipated that demands for fire protection service would increase slightly above current levels. Based on a population factor of 2.24 persons per household, the residential component of the project would result in the addition of approximately 269 residents to the City of Beverly Hills.¹⁴

Incidents

Calls for service associated with development of the residential component of the project are expected to be those typical of residential uses. Examples of such calls would include kitchen/house fires, garbage bin fires, car fires, electrical fires, and emergency medical requests. The BHFD presently responds to these situations throughout the City with adequate service and anticipates that they would be able to maintain adequate service with implementation of the proposed project.¹⁵ Likewise, the calls for service associated with the proposed hotel uses are anticipated to be similar to those currently experienced by the hotel. No net increase in retail, hotel office, restaurant, meeting room, or ballroom space would occur,

¹³ Communication with Deputy Fire Marshal Greg Barton, City of Beverly Hills Fire Department, April 19, 2007.

¹⁴ 2000 U.S. Census.

¹⁵ Communication with Deputy Fire Marshal Greg Barton, City of Beverly Hills Fire Department, April 19, 2007.

but there would be a net decrease of 14,834 square feet in non-hotel office and hotel support space. Therefore, total commercial square footage on the site would be reduced with project implementation. Based on this, fires and medical emergency incidents expected to occur at the project site could be adequately addressed with the types of equipment typically found at City fire stations and impacts related to incident types would be less than significant.

Access

Refer to Section 4.11, **Transportation, Traffic, Parking, and Circulation**, for an evaluation of emergency access and internal circulation. As stated therein, the proposed project has the potential to increase traffic along Wilshire Boulevard and Santa Monica Boulevard, which could adversely affect BHFD emergency access and response times. The project site is generally accessible to emergency vehicles, with Santa Monica and Wilshire Boulevards providing direct access from the Santa Monica (I-10) Freeway to the west, Merv Griffin Way providing access to the hotel and western side of the property, and the proposed new driveways onto the site from those three roadways offering access to the site's interior. The proposed project also includes several off-site roadway improvements designed to better facilitate the flow of traffic in the project vicinity (see Figure 3.0-12, **Circulation and Off-Site Roadway Improvements**). Details of the roadway improvements include the following:

- Wilshire Boulevard will be widened by 2 feet along the south side adjacent to the project site from Merv Griffin Way easterly to The Beverly Hilton pedestrian entrance;
- As part of the Wilshire Boulevard roadway widening, the hotel pedestrian entrance will be enlarged for loading/unloading and emergency hotel access;
- From the hotel pedestrian entrance to approximately 160 feet west of the Santa Monica Boulevard intersection, an additional 7 feet of street widening along the south side of Wilshire Boulevard will be implemented to provide a new eastbound lane on Wilshire Boulevard;
- From approximately 160 feet west of Santa Monica Boulevard to the intersection with Santa Monica Boulevard, an additional 3 feet of street widening and removal of the raised median island on Wilshire Boulevard will be implemented to provide a new right-turn-only lane on Wilshire Boulevard;
- The curb radius at the corner of Wilshire Boulevard and Santa Monica Boulevard will be redesigned and improved to provide easier and safer right turns from Wilshire Boulevard to Santa Monica Boulevard;
- The existing traffic signal at the intersection of Wilshire and Santa Monica Boulevards will be reconstructed and retimed to improve the efficiency of intersection operations;
- Approximately 10 to 12 feet of new sidewalk and streetscape improvements will be provided along the Wilshire Boulevard perimeter of The Beverly Hilton;

4.10.1 Fire Protection and Emergency Services

- A new traffic signal will be installed at the intersection of Merv Griffin Way and Santa Monica Boulevard to improve access to the project site and Wilshire Boulevard;
- Merv Griffin Way will be aligned with Whittier Drive at its intersection with Wilshire Boulevard. The reconstructed intersection will include three northbound lanes, a right-turn lane, and two southbound lanes to increase the intersection capacity. In addition, a curb line setback along Merv Griffin Way north of the hotel entrance will allow for additional production and delivery vehicle circulation and parking; and
- Any of the City's historically significant streetlights in Wilshire Boulevard or Santa Monica Boulevard that are removed during project construction will be reinstalled.

These improvements, especially the addition of a traffic signal at Merv Griffin Way and Santa Monica Boulevard and the widening of Wilshire Boulevard to facilitate right turns onto Santa Monica Boulevard, are intended to help offset any increased vehicular congestion caused by project operation. Additionally, the project would be constructed in compliance with all applicable building and fire codes governing emergency access and fire safety.

The BHFD has identified the proposed traffic signal at Merv Griffin Way and Santa Monica Boulevard as having the potential to slow emergency response times and inhibit access to the site.¹⁶ If not fitted with a BHFD-approved Opticom device, a traffic signal pre-emption used by the BHFD to control signalized intersections, the proposed signal could reduce emergency response times and inhibit emergency vehicle access to the project site. This would conflict with industry standards for access, one of the Site Access, Circulation, and Parking (Emergency Vehicle Access) significance thresholds defined in **Section 4.11, Transportation, Traffic, Parking, and Circulation**. Since this could reduce the level of fire protection or emergency services, this is considered a potentially significant impact.

Fire Flow

As discussed above, the project site is currently served by Hydrants No. 339, No. 340, No. 341, No. 342 and No. 343 located along Wilshire Boulevard. The City Engineer has indicated that the fire flow of 1,000 to 1,500 gallons per minute (gpm) measured at hydrants serving the project site may not be adequate flow for the project, which is a potentially significant impact. Although specific fire flow requirements for the proposed project would not be determined until final plans are submitted, the City Engineer recommends that the 8-inch and 10-inch sections of the line beneath Wilshire Boulevard which feeds the hydrants be upgraded to a 12-inch line in order to achieve sufficient fire flow for the project and thereby meet the requirements outlined in the California Fire Code (Part 9 of Title 24).¹⁷ Replacement of the line

¹⁶ Communication with Fire Marshall Tim Scranton, Beverly Hills Fire Department, December 7, 2006.

¹⁷ Communication with from Kevin Watson, Water Operations Manager, City of Beverly Hills Public Works Department, February 16, 2007.

would extend from the intersection of Wilshire Boulevard and Santa Monica Boulevard to the western boundary of the project site.¹⁸

Funding

Funding for BHFD staffing comes from the City's General Fund, as allocated during the City's budget process. Occupancy and operation of the proposed project would generate revenues accrued to the City's General Fund from sales and property taxes that could be used to help meet the capital outlay required to maintain fire protection service.

Any upgrades to water mains would be completed by the City of Beverly Hills Public Works Department. The project applicant would pay its "fair share" of the cost to upgrade water mains required for operation of the proposed project.

FIRE-2 *Would the project create a demand for additional fire stations, department personnel, and/or equipment?*

As discussed in 4.10.1.3, **Existing Conditions**, the BHFD considers existing stations, personnel and equipment to be adequate. Table 4.10.1-1 shows that the City's three fire stations are between 1 and 2 miles from the project site. There are 25 firefighter personnel on duty at all times with a combined staff of 75 fire suppression officers and 7 administrative personnel. Response times are 4.0 minutes for a fire engine company and 3.5 minutes for an ambulance. Two new ambulances, one command vehicle, and one utility pickup were recently purchased to replace older vehicles.

The BHFD does not anticipate the need for additional fire stations, personnel, or equipment to serve the population increase associated with implementation of the proposed project.¹⁹ It is anticipated that the need for additional BHFD staff would be incremental because the inclusion of standard fire protection measures required for all new buildings would minimize the potential for a large fire. Moreover, since the project area is within an existing response beat, emergency response times to the site are not anticipated to exceed existing standards. Because the existing, adequate levels of service would be maintained, no additional stations, personnel, or equipment would be required. Therefore, impacts would be less than significant and no mitigation is required.

¹⁸ Communication with Vincent Chee, City Engineer, City of Beverly Hills, February 22, 2007.

¹⁹ Ibid.

4.10.1.7 PROJECT MITIGATION MEASURES

- MM-FIRE-1 The proposed signal at the intersection of Santa Monica Boulevard and Merv Griffin Way shall be outfitted with an Opticom device, a traffic signal pre-emption used to control signalized intersections to allow the BHFD to provide a safe response route and to decrease response times to emergencies.
- MM-FIRE-2 The 8-inch and 10-inch sections of the main feeding Hydrants No. 339, No. 340, No. 341, No. 342, and No. 343 along Wilshire Boulevard shall be replaced with a 12-inch main in order to achieve adequate fire flow for the project. The line shall be replaced from the intersection of Wilshire Boulevard and Santa Monica Boulevard to the western boundary of the project site. The project applicant shall pay its "fair share" of the cost to upgrade 8-inch and 10-inch sections of the main feeding Hydrants No. 339, No. 340, No. 341, No. 342, and No. 343 along Wilshire Boulevard. Payment for this upgrade shall be made prior to the issuance of any building permit. Upgrading of the main shall be completed concurrently with project construction and prior to building occupancy. The project applicant shall coordinate with the City so that construction of the upgraded main shall not conflict with construction of the proposed project.

4.10.1.8 CUMULATIVE IMPACTS

The potential for cumulative impacts to fire protection and emergency services was assessed based upon consideration of the proposed project and citywide related projects. An increase in population from the implementation of the proposed project as well as all citywide related projects identified in Table 4.0-1 would result in additional calls for fire protection services. Citywide related projects in combination with the proposed project would result in the addition of approximately 1,567 new residents (700 units x 2.24 residents/unit) to the City of Beverly Hills. Based on a future population of 37,380 (35,813 current residents + 1,567 new residents), the ratio of firefighters per 1,000 residents would decrease to 2.01, or by approximately 4.3 percent from the current ratio.²⁰

Funding for any needed additional fire department staffing comes from the City's General Fund, as allocated during the City's budget process. Implementation and operation of future development projects in the City would generate revenues accrued to the City's General Fund from property and sales taxes that could be used to help meet the capital outlay for fire service. As long as the City allocates adequate funding to the department so that it may continue to meet its service obligations and as long as the BHFD maintains ultimate review over building codes, emergency access and fire safety, no significant

²⁰ Calculation assumes no change in staffing.

cumulative environmental impacts would occur. Therefore, the proposed project's incremental contribution to cumulative impacts on fire protection and emergency services would be less than considerable and impacts would be less than significant.

4.10.1.9 CUMULATIVE MITIGATION MEASURES

Since no cumulative impacts would result from the proposed project in combination with related projects, no cumulative mitigation measures are required.

4.10.1.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With incorporation of MM-FIRE-1 and MM-FIRE-2, project impacts would be reduced to less than significant levels. No unavoidable significant project-specific or cumulative impacts to fire protection and emergency services would occur.

4.10.2.1 INTRODUCTION

This section describes the impact of The Beverly Hilton Revitalization Plan on existing and future police protection services and facilities in the City of Beverly Hills resulting from project construction and the anticipated increase in the number of residences.

4.10.2.2 METHODOLOGY

This section was prepared by evaluating the residential components of the proposed project for its potential to increase demand on existing police protection services and facilities. Information regarding existing services and facilities was obtained from the General Plan Update, Technical Background Report¹ and consultation with the Beverly Hills Police Department.

4.10.2.3 EXISTING CONDITIONS

Staffing and Facilities

The Beverly Hills Police Department (BHPD) provides police protection services in the City of Beverly Hills. Such services include emergency and non-emergency police response, routine police patrols, investigative services, traffic enforcement and investigation, and parking code enforcement. The BHPD considers existing service to be adequate.²

Equipment includes 29 black and white patrol vehicles, 15 police motorcycles, 11 Traffic Control Officer vehicles, 37 unmarked police vehicles, and 6 specialty vehicles.³

The Department currently employs 138 sworn officers, not including administrative and support personnel⁴. The BHPD is facing a nearly 10 percent retirement rate for its sworn officers and within the next few years, 80 percent of its management staff will be eligible for retirement.⁵ Therefore, the BHPD will continue aggressive recruitment efforts to respond to this forecast reduction in staff and officers.

¹ *City of Beverly Hills General Plan Update, Technical Background Report*, Section 6.6: Police Services, prepared by EIP Associates in association with Kaku Associates, Inc. and Keyser Marston Associates, Inc., October 2005. This report is available for review at the City of Beverly Hills, Community Development and Planning Department and online at www.beverlyhills.org.

² Communication with Sergeant Michael Publicker, Beverly Hills Police Department, January 16, 2007.

³ *Technical Background Report (TBR)*, p.6-61.

⁴ *Ibid.*, p. 6-55.

⁵ *Ibid.*, p. 6-64

As shown in Figure 4.10.2-1, Location of Police Station, BHPD headquarters is located approximately 1 mile from the project site at 464 North Rexford Drive. The BHPD has established a response system to efficiently allocate staff to calls for service by subdividing the City into five response beats. In this manner, the dispatcher can relay to patrol officers the district and beat, so officers will know precisely where in the City the call is being placed and a response can be provided in a timely fashion.

The intent is to create service beats that maintain response times that meet or exceed the target standards and provide the greatest law enforcement presence in those areas in which the highest proportion of criminal activity is occurring within the City. Parameters considered in establishing a beat boundary include the population of an area, the number and type of calls for service, response times, and the potential for future and current growth. The Beverly Hilton project site is located in Beat 4.

Statistics and Response Times

In 2006, the BHPD reported 1,197 repressible crimes, of which 1,144 incidents (or 96 percent) involved a form of burglary, theft, or robbery. Residential burglary accounted for 163 of these incidents. The remaining crimes comprised aggravated assault, arson, and forcible rape. There were no criminal homicides. Traffic incidents included 348 DUI arrests, 7 fatal traffic accidents, and 534 injury traffic accidents.⁶

In 2006, the BHPD received a total of 32,120 radio calls for service. The BHPD uses response time as the main indicator of its quality of service. The target response time for Priority 1 (911 emergency) calls is less than 3 minutes. Response time is measured as the time between when a call is received and when the first patrol car arrives. In 2006, the actual average response time for Priority 1 calls was 3.17 minutes. Response times for Priority 2 and 3 calls averaged 5.40 minutes and 4.88 minutes, respectively. Officer to population ratios are not used as indicators of quality of service since the City's daytime population (approximately 200,000 people) is dramatically higher than the nighttime population (approximately 36,000 people).⁷

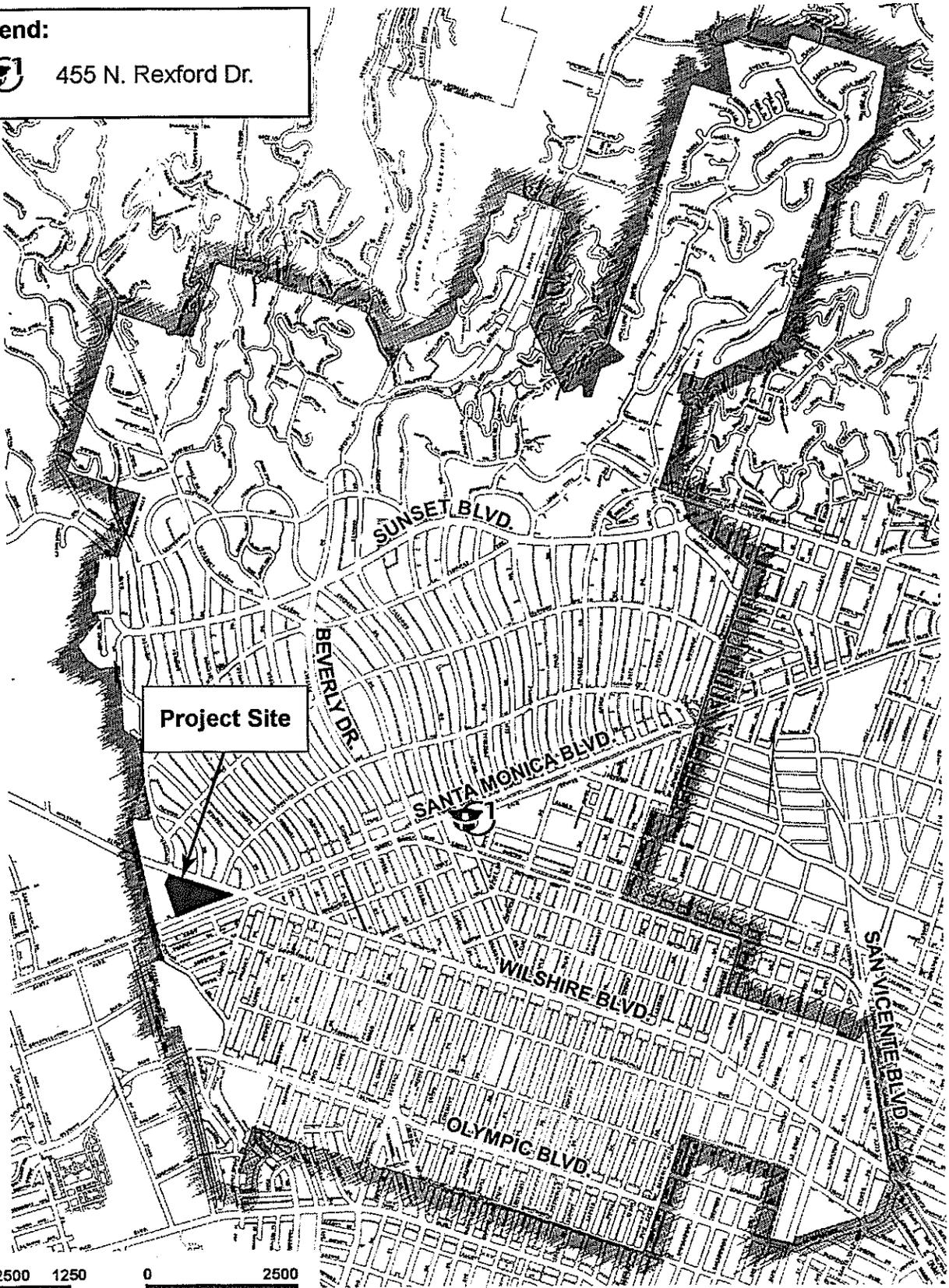
⁶ Communication with Sergeant Michael Publicker, Beverly Hills Police Department, January 16, 2007.

⁷ Ibid.

Legend:



455 N. Rexford Dr.



2500 1250 0 2500

APPROXIMATE SCALE IN FEET

SOURCE: City of Beverly Hills, Department of Public Works – 1997, Impact Sciences, Inc. – February 2007

FIGURE 4.10.2-1

4.10.2-3

Location of Police Station

4.10.2.4 REGULATORY SETTING

All law enforcement agencies within the State of California are organized and operate in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct, and training for peace officers. Under state law, all sworn municipal and County officers are state peace officers.

The County of Los Angeles is required by state law to organize a formal mutual aid agreement between all police departments within its jurisdiction. This agreement is set forth in the Mutual Aid Operations Plan for Los Angeles County. The Mutual Aid Operations Plan provides a structure of response should an emergency in Beverly Hills arise that requires immediate response by more law enforcement personnel than would be available to the BHPD using all available resources.

Funding for police department staffing comes from the City's General Fund, and funding is allocated to the BHPD through the City's budget process. Occupancy and operation of future development projects in the City would generate revenues accrued to the City's General Fund (i.e., sales tax, property tax, etc.) that could be used to help meet the capital outlay for police services.

4.10.2.5 SIGNIFICANCE CRITERIA

Impacts to police protection and emergency services in the City would be considered significant if the proposed project results in either of the following:

- POL-1 Increases demand for the level of police protection that would reduce the level of protection services; and/or
- POL-2 Creates demand for additional police stations, department personnel, and/or equipment.

4.10.2.6 ENVIRONMENTAL IMPACT ANALYSIS

- POL-1 *Would the project increase demand for the level of police protection that would reduce the level of protection services, and/or*
- POL-2 *Would the project create demand for additional police stations, department personnel, and/or equipment?*

Construction Impacts

Construction of the proposed project would involve demolition of several buildings and structures including the Palm/Oasis Court, the Cabana/Lanai Rooms, the one-story "plinth" building fronting Wilshire Boulevard containing the conference center and offices, the parking structure, and the former

Trader Vic's restaurant and adjacent surface parking lot. The new buildings and structures proposed as part of the project include two condominium buildings, the Waldorf Astoria Hotel building, and two subterranean parking structures. The existing Wilshire Tower would be retained with only minor upgrades and renovations. Construction activity would not normally require services from the police department, except in the cases of trespassing, theft, and vandalism. Such activities at a construction site are not unusual, but are only occasional and do not typically place undue demands on police protection services.

Construction of the project may increase traffic both on and adjacent to the project site during working hours because commuting construction workers, trucks, and other large construction vehicles would be added to normal traffic during the buildout. During construction, all construction-related vehicles and construction materials would be accommodated on the project site. Nonetheless, slow-moving, construction-related traffic on local adjacent roadways may temporarily reduce optimal traffic flows on local roadways and could conceivably delay police vehicles traveling through the area or contribute to a vehicle accident. However, this would not be expected to increase demand for the level of police protection and reduce the current level of service, or create demand for additional stations, personnel, or equipment.

Additionally, the use of private security at the construction site, the general safekeeping of construction equipment, the use of flagmen, and other standard construction practices would be implemented.

For these reasons, impacts on police protection services would be less than significant during project constructions.⁸

Operational Impacts

With the introduction of 120 new residential units and an approximately 79 percent net increase in building square footage, it is anticipated that demands for police protection service would increase slightly above current levels. Based on a population factor of 2.24 persons per household,⁹ the residential component of the project would result in the addition of approximately 269 residents to the City of Beverly Hills. Based on a BHPD estimate of 0.95 calls per resident per year, the annual call volume generated by the project would be approximately 256 calls. Based on the 2006 call volume of 32,120 calls, project generated calls would result in a less than 1 percent call increase. The BHPD considers this to be a less than significant increase in service demand; therefore the additional service calls generated by the residents, guests, and employees would not result a significant impact on the BHPD's ability to provide

⁸ - Communication with Sergeant Michael Publicker, Beverly Hills Police Department, March 29, 2007.

⁹ 2000 U.S. Census.

adequate police protection services and no additional police stations, personnel, or equipment would be required.¹⁰

Emergency access to the project site would be available via Wilshire Boulevard, Santa Monica Boulevard, and Merv Griffin Way. The proposed project has the potential to increase traffic along Wilshire Boulevard and Santa Monica Boulevard, which could adversely affect BHPD emergency access and response times. However, the project includes several off-site roadway improvements designed to better facilitate the flow of traffic in the project vicinity (see Figure 3.0-12, *Circulation and Off-Site Roadway Improvements*). Details of the roadway improvements include the following:

- Wilshire Boulevard will be widened by 2 feet along the south side adjacent to the project site from Merv Griffin Way easterly to The Beverly Hilton pedestrian entrance;
- As part of the Wilshire Boulevard roadway widening, the hotel pedestrian entrance will be enlarged for loading/unloading and emergency hotel access;
- From the hotel pedestrian entrance to approximately 160 feet west of the Santa Monica Boulevard intersection, an additional 7 feet of street widening along the south side of Wilshire Boulevard will be implemented to provide a new eastbound lane on Wilshire Boulevard;
- From approximately 160 feet west of Santa Monica Boulevard to the intersection with Santa Monica Boulevard, an additional 3 feet of street widening and removal of the raised median island on Wilshire Boulevard will be implemented to provide a new right-turn-only lane on Wilshire Boulevard;
- The curb radius at the corner of Wilshire Boulevard and Santa Monica Boulevard will be redesigned and improved to provide easier and safer right turns from Wilshire Boulevard to Santa Monica Boulevard;
- The existing traffic signal at the intersection of Wilshire and Santa Monica Boulevards will be reconstructed and retimed to improve the efficiency of intersection operations;
- Approximately 10 to 12 feet of new sidewalk and streetscape improvements will be provided along the Wilshire Boulevard perimeter of The Beverly Hilton;
- A new traffic signal will be installed at the intersection of Merv Griffin Way and Santa Monica Boulevard to improve access to the project site and Wilshire Boulevard;
- Merv Griffin Way will be aligned with Whittier Drive at its intersection with Wilshire Boulevard. The reconstructed intersection will include three northbound lanes, a right-turn lane, and two southbound lanes to increase the intersection capacity. In addition, a curb line setback along Merv Griffin Way north of the hotel entrance will allow for additional production and delivery vehicle circulation and parking; and

¹⁰ Communication with Sergeant Michael Publicker, Beverly Hills Police Department, March 29, 2007.

- Any of the City's historically significant streetlights in Wilshire Boulevard or Santa Monica Boulevard that are removed during project construction will be reinstalled.

These improvements, especially the addition of a traffic signal at Merv Griffin Way and Santa Monica Boulevard and the widening of Wilshire Boulevard to facilitate right turns onto Santa Monica Boulevard, would help offset any increased vehicular congestion caused by project operation. In response to the potential traffic impacts at the intersection associated with implementation of the proposed project, the Beverly Hills Fire Department has requested the installation of an Opticom device at all new traffic signals associated with the project, included as mitigation in Section 4.10.1, **Fire Protection and Emergency Services**.¹¹ The device controls the light to facilitate travel for emergency vehicles. The BHPD has recommended that Santa Monica Boulevard be widened between its intersection with Wilshire Boulevard and the western City limit in order to alleviate a portion of the congestion at the intersection. Nevertheless, according to the BHPD, no significant impact to police emergency access or response time to the project site and the vicinity is anticipated with implementation of the project.¹² Refer to Section 4.9, **Transportation and Circulation**, for further discussion of emergency access and internal circulation.

Based on the fact that the BHPD considers existing service to be adequate, that call volume is expected to increase by less than 1 percent with project implementation, and that adequate emergency access would be provided on the project site in conjunction with off-site roadway improvements, impacts related to the level of police protection would be less than significant.

4.10.2.7 PROJECT MITIGATION MEASURES

Since no significant impacts were identified, no mitigation measures are required.

4.10.2.8 CUMULATIVE IMPACTS

The potential for cumulative impacts to police protection was assessed based upon consideration of the proposed project and citywide related projects. An increase in population from the implementation of the proposed project as well as all citywide related projects identified in Table 4.0-1 would result in approximately 1,489 additional calls for police protection services. Citywide related projects in combination with the proposed project would result in the addition of approximately 1,567 new residents (700 units x 2.24 residents/unit) to the City of Beverly Hills. Based on a BHPD estimate of 0.95 calls per resident per year, annual call volume would increase by 1,489 calls or a 5 percent increase over the existing call volume of 32,120 calls. According to the BHPD, this increase in call volume is not considered

¹¹ Communication with Deputy Fire Marshal Greg Barton, Beverly Hills Fire Department, April 19, 2007.

¹² Communication with Sergeant Michael Publicker, Beverly Hills Police Department, March 29, 2007.

significant.¹³ Since the call volume is used by the BHPD to measure the demand for services, cumulative project impacts to police services are expected to be less than significant.

As with the proposed project, each identified related project would generate tax revenues accrued to the City's General Fund, which could then be used by the City to fund the capital outlay for police service. Additionally, payment of development impact fees may be required by the City. Based on the above, the project impacts, in combination with impacts associated with the cumulative projects within the City, would result in less than significant impacts on police protection services.

4.10.2.9 CUMULATIVE MITIGATION MEASURES

Since no significant cumulative impacts were identified, no cumulative mitigation measures are required.

4.10.2.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No unavoidable significant impacts to police services would with implementation of the proposed project.

¹³ Ibid.

4.10.3.1 INTRODUCTION

This section of the Draft EIR addresses public school service for the City of Beverly Hills and the project, identifying schools that serve the project site, their capacities, and their ability to accept new students resulting from development of the proposed project. Where impacts are identified, mitigation measures are recommended to reduce such impacts to acceptable levels.

4.10.3.2 METHODOLOGY

This section was prepared by evaluating the residential component of the proposed project for its potential to increase demand on existing school facilities. Information regarding existing facilities and enrollment was obtained from communications with the Beverly Hills Unified School District and the City of Beverly Hills General Plan Update, Technical Background Report.¹ This report is available for review at the City of Beverly Hills.

4.10.3.3 EXISTING CONDITIONS

The project site is located within the boundaries of the Beverly Hills Unified School District (BHUSD). BHUSD operates seven schools within the City, including one high school (grades 9–12), and four elementary schools (grades K–8). For purposes of this analysis, two schools, Moreno High Continuation School and Beverly Hills Adult School will not be considered in the calculations.² The location of each school, relative to the project site, is shown on Figure 4.10.3-1, Location of Schools, while the enrollment and capacity of each school is listed in Table 4.10.3-1, Beverly Hills Unified School District Schools. As illustrated in the table, Beverly Hills High School had an enrollment of 2,329 students with a capacity for 2,300 students during the 2005–2006 school year. The remaining K–8 grade schools had a combined enrollment of 2,933 students and a combined capacity of 2,972 students. As indicated below, both Hawthorne School and Beverly Hills High School operated over capacity during the 2005–2006 school year. Beverly Hills High School enrolled 29 students above capacity and Hawthorne School enrolled 18 students above capacity. The remaining three schools totaled an excess capacity of 57 students.³

¹ City of Beverly Hills General Plan Update, Technical Background Report, prepared by EIP Associates in association with Kaku Associates, Inc. and Keyser Marston Associates, Inc., October 2005.

² Moreno High Continuation School is not utilized by the majority of high school students (enrollment in the 2003–04 school year was 23 students) and Beverly Hills Adult School serves adults.

³ Communication with Christine Plotkin, Research Analyst, BHUSD, February 13, 2006. Ms. Plotkin further indicates that current 2006–2007 enrollment at Beverly Hills High School is 2,332 students (32 students above capacity).

**Table 4.10.3-1
Beverly Hills Unified School District Schools**

School	Grades	Capacity	Enrollment 2005-2006	Excess (Deficit) Capacity
Beverly Vista School 200 S. Elm Drive	K-8	762	726	36
El Rodeo School 605 N. Whittier Drive	K-8	782	771	11
Hawthorne School 624 N. Rexford Drive	K-8	695	713	(18)
Horace Mann School 8701 Charleville Boulevard	K-8	733	723	10
Elementary Schools Subtotals		2,972	2,933	39
Beverly Hills High School 241 S. Moreno Drive	9-12	2,300	2,329	(29)
All Schools Totals		5,272	5,262	10

Source: Communication with Christine Plotkin, Research Analyst, BHUSD, December 14, 2006.

In addition, the following private schools operate in the City: four daycare centers, one preschool-grade 6, two grades K-8, one preschool-grade 8, and one grades 7-12.

BHUSD anticipates the following improvements over the next four years: a new high school science technology center, the new Beverly Vista Building E (to house three new science labs, two new computer labs, a library, cafeteria and classrooms for the middle school), a new HVAC system at the high school, and modernization (seismic upgrades, lighting, electrical, painting, etc.) of the high school and all four elementary schools.⁴

Student enrollment at BHUSD schools has been increasing in recent years; however, not all students enrolled in BHUSD schools are residents of the City of Beverly Hills. During the 2006-2007 school year total enrollment was approximately 5,000 students, 800 of whom were "permitted" students from outside the City of Beverly Hills. All students within the City of Beverly Hills are accommodated within the BHUSD schools, and for schools with surplus capacity, permits are allocated randomly based on availability.⁵

⁴ Technical Background Report, p. 4-6.

⁵ Communication with James Hanson, BHUSD, July 12, 2007.

Legend:



Beverly Hills High School
241 S. Moreno Dr.



Beverly Vista School
200 S. Elm Dr.



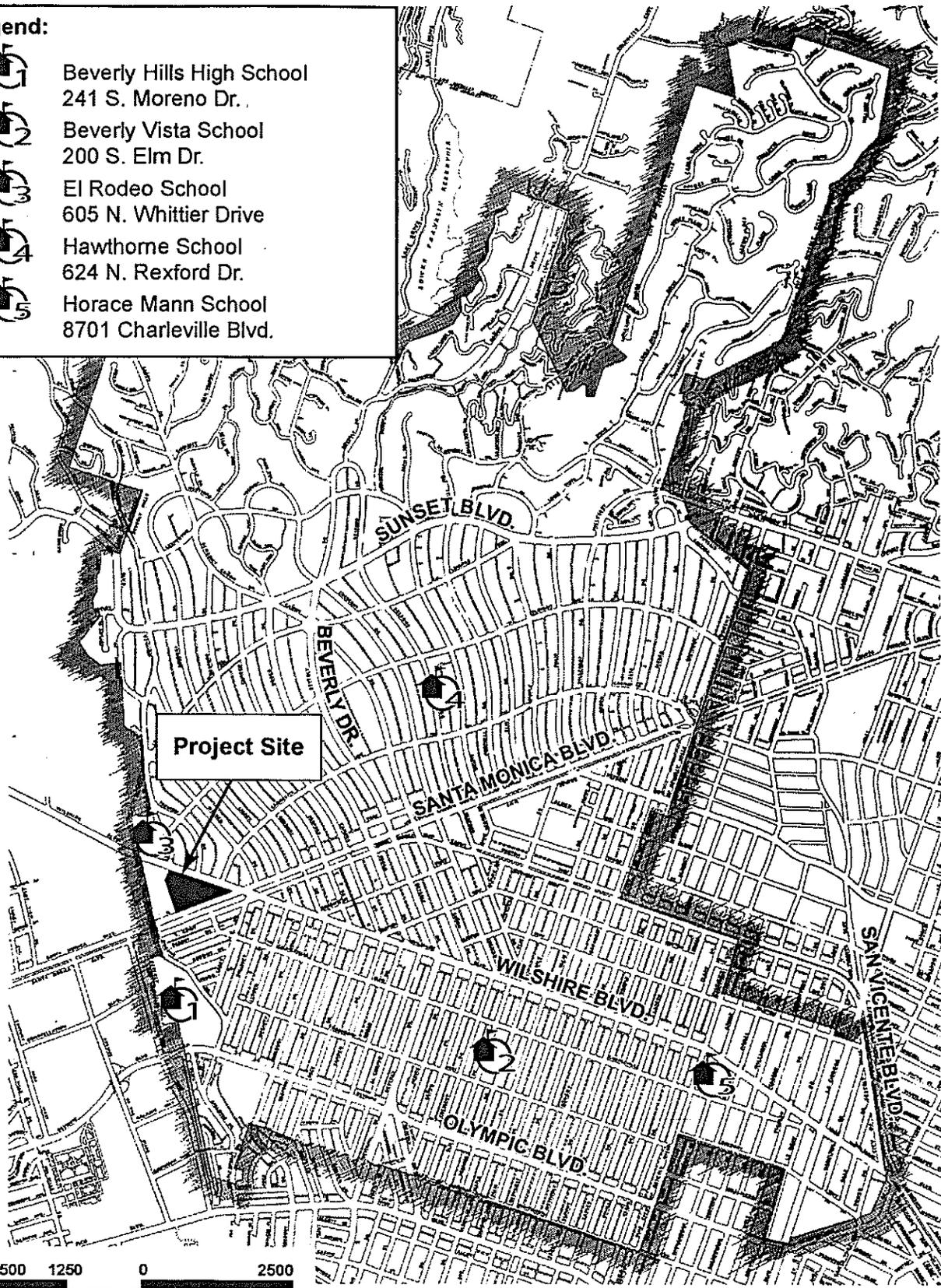
El Rodeo School
605 N. Whittier Drive



Hawthorne School
624 N. Rexford Dr.



Horace Mann School
8701 Charleville Blvd.



2500 1250 0 2500

APPROXIMATE SCALE IN FEET

SOURCE: City of Beverly Hills, Department of Public Works - 1997, Impact Sciences, Inc. - February 2007

FIGURE 4.10.3-1

Overall, enrollment within the district has been relatively stable. From the 2003–04 school year to the 2005–06 school year, total enrollment increased from 5,094 to 5,262 students. However, prior to the 2003–04 school year, total enrollment had been decreasing. In the 1997–98 school year, enrollment was 5,315 students. Therefore, student enrollment has decreased by 54 students, or 1 percent, between the 1997–98 and 2005–06 school year.⁶ Since state funding is based on average daily attendance, an increase or decrease in student enrollment impacts BHUSD’s revenue. To accommodate planned improvements, districts fund new school facilities through a combination of several state sources, including state bonds, local bonds, special taxes, developer fees, and various funding sources. Districts have also used multi-track, year-round education as a way to avoid or defer the cost of new construction.

4.10.3.4 REGULATORY SETTING

The state has traditionally been responsible for the funding of local public schools. In 1998, the state passed Senate Bill 50 (SB 50) and Proposition 1A to assist facilities with funding to serve students generated by new development projects. The provisions of SB 50 prohibit local agencies from denying either legislative or adjudicative land use approvals on the basis that school facilities are inadequate. Instead, the bill allows school districts to collect impact fees from developers of new residential and commercial/industrial building space. According to Government Code Section 65996, the development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation” for impact caused by new development. These fees are adjusted periodically for inflation. BHUSD currently collects developer fees in the amount of \$2.63 per square foot of residential construction and \$0.42 per square foot of commercial/non-residential construction.⁷

4.10.3.5 SIGNIFICANCE CRITERIA

Impacts to school services are evaluated using the following significance criteria.

- SCH-1 The proposed project would result in a significant impact to school services if the project would increase demand for the level of school services or create a substantial need for additional schools in the area.

⁶ Communication with Christine Plotkin, Research Analyst, BHUSD, February 13, 2006.

⁷ Communication with Christine Plotkin, Research Analyst, Beverly Hills Unified School District, December 14, 2006.

4.10.3.6 ENVIRONMENTAL IMPACT ANALYSIS

SCH-1 The proposed project would result in a significant impact to school services if the project would increase demand for the level of school services or create a substantial need for additional schools in the area.

The proposed project would involve the construction of 120 condominium units. Using a standard generation rate of 0.7 students per household, as recommended by BHUSD, the project would add approximately 84 new students within the City of Beverly Hills and thus within the BHUSD attendance area. A certain percentage of these students would be expected to attend private schools. In California, approximately 10 percent of students attend private school, although this percentage may be higher or lower in the City of Beverly Hills.⁸ However, the following analysis assumes that the project would add 84 students who would all attend BHUSD public schools.

Beverly Hills High School is currently operating above capacity and any additional students entering grades 9–12 have the potential to affect enrollment capacity at the high school. However, as discussed above, BHUSD accommodates all City residents first and allocates excess capacity to students residing outside the school district boundaries. As such, high school students generated by the proposed project could be accommodated at Beverly Hills High School.

El Rodeo School is located near the project site and would be the closest school for those students in grades K–8. During the 2005–2006 school year, this school only had room to accommodate 11 additional students before reaching maximum capacity. Horace Mann and Beverly Vista Schools had a combined excess capacity of 46 students. As previously stated, BHUSD accommodates all City residents first and allocates excess capacity to students residing outside the school district boundaries. As such, elementary school students generated by the proposed project could be accommodated at El Rodeo School, Horace Mann School, and Beverly Vista School.

Additionally, as required by SB 50, payment of fees to the school district will be required of the project applicant. Given that BHUSD has adequate capacity to accommodate all students residing within the City of Beverly Hills and that impact fees will be paid consistent with requirements set forth in SB 50, no significant impacts to schools would result from project implementation.

4.10.3.7 PROJECT MITIGATION MEASURES

No mitigation measures are required.

⁸ California Department of Education, 2006 *Fact Book: Handbook of Education*, [Online] 15 December 2006, <<http://www.cde.ca.gov>>.

4.10.3.8 CUMULATIVE IMPACTS

The potential for cumulative impacts to local schools was assessed based upon consideration of the proposed project and in combination with the list of citywide related projects identified in Table 4.0-1. Citywide related projects and the proposed project would result in the addition of approximately 1,567 residents (700 units x 2.24 residents/unit) to the City of Beverly Hills. Using the BHUSD suggested rate of 0.7 students per household, implementation of all citywide projects would result in the addition of approximately 490 school-aged children. As noted above, during the 2006-2007 school year, total enrollment was approximately 5,000 students, 800 of which were "permitted" students from outside the City of Beverly Hills. All students within the City of Beverly Hills are accommodated within the BHUSD schools, and for schools with surplus capacity, permits are allocated randomly based on availability.⁹ With the introduction of 490 additional school-aged children, all City of Beverly Hills students would be accommodated within BHUSD schools and excess capacity would continue to be allocated to students residing outside the City. As such, no significant cumulative impacts to schools would result from implementation of the proposed project in combination with related projects.

4.10.3.9 CUMULATIVE MITIGATION MEASURES

No mitigation measures are required.

4.10.3.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No unavoidable significant project-specific or cumulative impacts to schools would occur.

⁹ Communication with James Hanson, BHUSD, July 12, 2007.

4.10.4.1 INTRODUCTION

This section describes the impact of the proposed project on existing and future recreation and parks facilities in the City of Beverly Hills resulting from the anticipated increase in the number of residents.

4.10.4.2 METHODOLOGY

This section was prepared by evaluating the residential component of the proposed project for its potential to increase demand on existing parks and recreation facilities. Information regarding existing facilities was obtained from the General Plan Update, Technical Background Report.¹ Information regarding potential project impacts was obtained through consultation with the City Recreation and Parks Department.

4.10.4.3 EXISTING CONDITIONS

City Park and Recreation Facilities

The City of Beverly Hills Recreation and Parks Department operates and maintains public parks and recreation facilities in the City. The City of Beverly Hills' park system consists of 76.7 acres of developed parkland in 13 parks, including seven mini parks, six major parks, and two community centers.² The locations of these facilities are shown in Figure 4.10.4-1, **Location of Parks and Recreation Facilities**, and the amenities included at each park site are summarized in Table 4.10.4-1, **City of Beverly Hills Public Parks**.

The City is built-out with no major vacant tracts of land, leaving little space for additional parkland within the City boundaries. While no new parks are currently proposed, a new community center has been proposed within the light industrial area in the northwestern section of the City.³ The proposed community center would require approximately 2.5 acres of land and include 80,000 square feet of enclosed space. Proposed amenities include two basketball courts, a fitness center, group exercise/dance studio, large community hall, rock climbing wall, and a day care room. Proposed outdoor features include an eight-lane lap pool, patio/courtyard, enclosed play area, and a multi-purpose field. Membership would be required. Additionally, some funds have been allocated for the renovation of La

¹ *City of Beverly Hills General Plan Update, Technical Background Report*, Chapter 4.2, Recreation and Parks, prepared by EIP Associates in association with Kaku Associates, Inc. and Keyser Marston Associates, Inc., October 2005.

² *Technical Background Report*, p. 4-12.

³ *Ibid.*, p. 4-15.

Cienega Park and the design process is anticipated to commence in Fiscal Year 2007/2008. The City is also in the midst of planning the renovation of Roxbury Park.⁴

Based on a January 1, 2006 population estimate of 35,813 residents, provided by the State Department of Finance, the parkland-to-population ratio in the City of Beverly Hills is presently 2.14 acres of parkland per 1,000 residents. This ratio is based on a total parkland area of 76.7 acres, as presented in Table 4.10.4-1. The National Recreation and Parks Association (NRPA) recommends a ratio of 2.5 acres of neighborhood parkland per 1,000 residents, as defined in the City's General Plan. The NRPA defines neighborhood parks as those that are 5.0 to 20.0 acres in size. Total neighborhood parkland in the City of Beverly Hills is 74.1 acres.⁵ Therefore, the neighborhood parkland to population ratio is 2.07 acres per 1,000 residents, which falls below the recommended ratio. The NRPA does not set standards for parks smaller than 5.0 acres in size. No parks within the City are designated as district or community parks (20.0 to 100.0 acres); however, the NRPA recommends 2.5 acres of district or community parkland per 1,000 residents. Therefore, the City is currently deficient in both neighborhood and district or community parkland based on NRPA standards. However, the quantity of parkland calculated does not take into account open space provided at City schools. School recreational facilities are taken into account in the assessment of open space in the City's General Plan.⁶ With the inclusion of the 16 acres of school facilities, the parkland-to-population ratio in the City increases to 2.59 acres of parkland per 1,000 residents.

City residents also utilize private amenities including backyards, swimming pools, and fitness clubs to satisfy recreational needs. It should be noted that Beverly Hills is a built-out, urban community with limited opportunities, if any, to expand its available parkland. Although no new parks are proposed within the City, a new community center is under consideration, as discussed above.

Regional Facilities

There are a variety of recreational and park facilities in the vicinity of the City. They offer many different types of activities, including some that are unique to the region. These facilities include, but are not limited to, the Hollywood Bowl (summer outdoor concerts), the County Museum of Art, UCLA, the La Brea Tar Pits, Griffith Park, and the Santa Monica and San Gabriel Mountains.

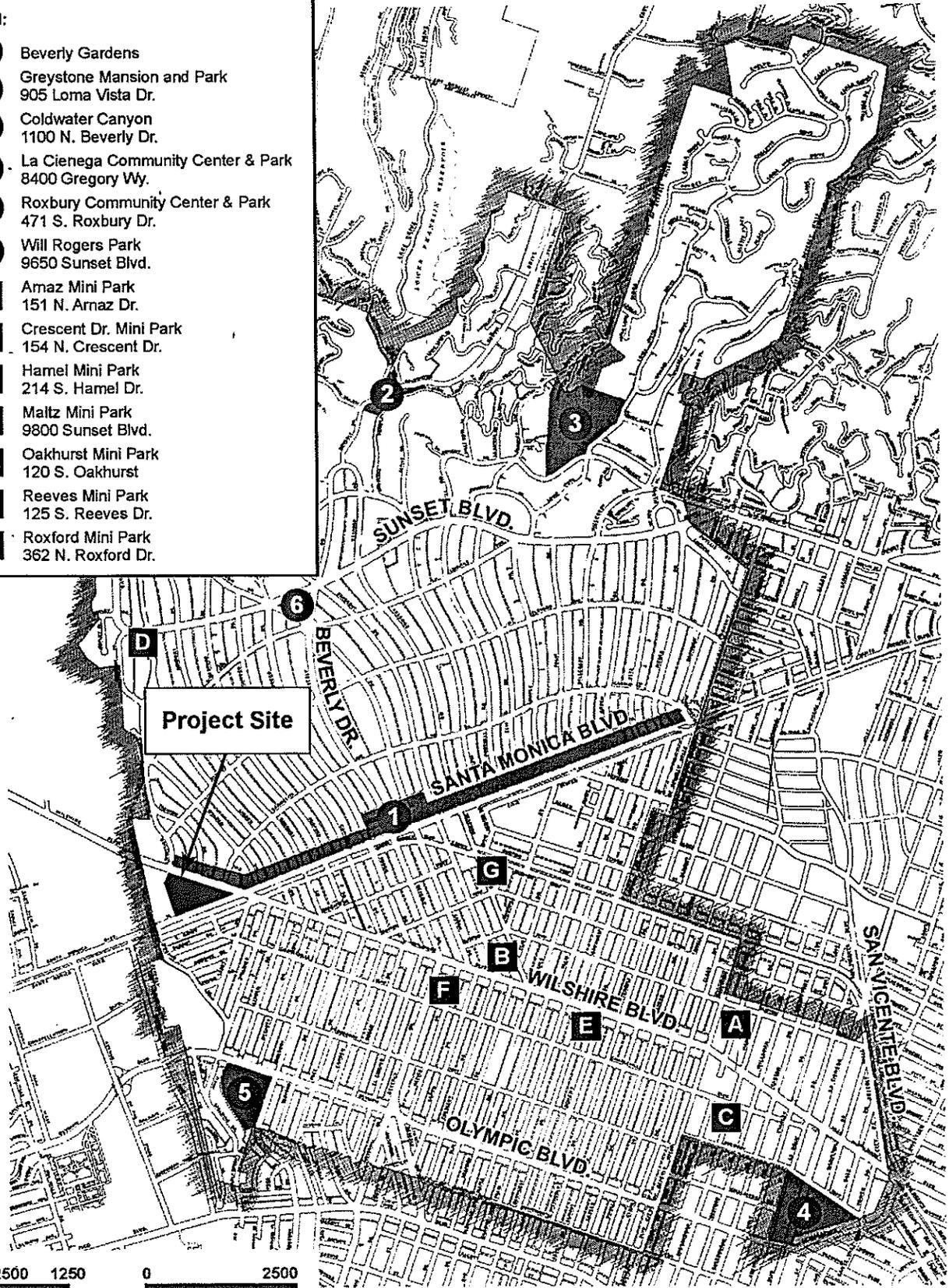
⁴ Communication with Pat Agnitch, Deputy Director of Beverly Hills Recreation and Parks Department, 30 November 2006.

⁵ For purposes of this analysis, Will Rogers Memorial Park, which is 3.2 acres, is considered a neighborhood park since the NRPA does not provide a category for parks between 1.0 and 5.0 acres in size. A park less than 1.0 acre in size is considered a mini park.

⁶ The City of Beverly Hills, General Plan, Open Space Element, adopted February 1, 1977, pg. 11.

Legend:

- 1** Beverly Gardens
- 2** Greystone Mansion and Park
905 Loma Vista Dr.
- 3** Coldwater Canyon
1100 N. Beverly Dr.
- 4** La Cienega Community Center & Park
8400 Gregory Wy.
- 5** Roxbury Community Center & Park
471 S. Roxbury Dr.
- 6** Will Rogers Park
9650 Sunset Blvd.
- A** Amaz Mini Park
151 N. Arnaz Dr.
- B** Crescent Dr. Mini Park
154 N. Crescent Dr.
- C** Hamel Mini Park
214 S. Hamel Dr.
- D** Maltz Mini Park
9800 Sunset Blvd.
- E** Oakhurst Mini Park
120 S. Oakhurst
- F** Reeves Mini Park
125 S. Reeves Dr.
- G** Roxford Mini Park
362 N. Roxford Dr.



SOURCE: City of Beverly Hills, Department of Public Works – 1997, Impact Sciences, Inc. – February 2007

FIGURE 4.10.4-1

**Table 4.10.4-1
City of Beverly Hills Public Parks**

Facilities	Acres	Features
Beverly Gardens Santa Monica & Wilshire Boulevards	16.3	22 block linear park along Santa Monica & Wilshire Boulevards featuring a cactus garden, a rose garden, Wilshire electric fountain, Doheny Fountain, a decomposed granite jogging and walking path, and arbors.
Coldwater Canyon Park 1100 N. Beverly Drive	5.7	Passive park featuring a preschool, a children's playground, an outdoor classroom, and a historic water feature.
Greystone Mansion & Park 905 Loma Vista Drive	18.5	Features formal gardens, vistas, large fountain, pool, and inner courtyard.
La Cienega Community Center, Park and Tennis Center 8400 Gregory Way	16.6	Features playground equipment for children, three baseball diamonds or two soccer fields, a 1/3 mile jogging track, barbecue grills, four picnic tables, and a community center offering classes for youth, adults and seniors. In addition, the La Cienega Tennis Center offers 16 well-lit professional tennis courts.
Roxbury Park Community Center, Park and Clubhouse 471 S. Roxbury Drive	13.8	Features picnic table rentals, large children's playground, 4 well-lit tennis courts, lawn bowling, croquet and putting green, baseball diamond/soccer field, 1-1/2 basketball courts, sand volleyball courts, senior adult programs and services, adult classes, and preschool classes.
Will Rogers Memorial Park 9650 Sunset Boulevard	3.2	Landscaped with fountain/pond, benches and restroom facilities.
Arnaz Mini Park 151 N. Arnaz Drive	0.2	Mini Park
Crescent Drive Mini Park	0.3	Mini Park
Hamel Mini Park 214 S. Hamel Drive	0.2	Mini Park
Maltz Mini Park 9800 Sunset Boulevard	1.0	Mini Park
Oakhurst Mini Park 120 S. Oakhurst	0.1	Mini Park
Reeves Mini Park 125 S. Reeves Drive	0.4	Mini Park
Rexford Rest Mini Park 362 N. Rexford Drive	0.4	Mini Park
Total	76.7	

Source: City of Beverly Hills General Plan Update, Technical Background Report, p.4-12.

Public School Facilities.

When not being used by the School District, most recreation facilities at the City's public schools are open to the public (i.e., residents of Beverly Hills). These facilities are operated by the City Recreation and Parks Department, which conducts various activities at each school. Collectively, approximately 16 acres of these facilities are open to the public after school hours.⁷ The public's use of these facilities varies according to the season. For example, the pool is used more during the water sports seasons in the spring and summer than it is during the fall and winter; similarly, during late summer and fall, the field is used by the school for football practice.

Private Facilities

There is a variety of private recreational facilities within the City of Beverly Hills. Examples of private facilities in the City include gymnasiums, athletic clubs, swimming pools, and open grass areas. While it is not possible to estimate the extent to which private recreation facilities reduce the demand upon public facilities, it is reasonable to assume that the availability of substantial private recreational resources provides an attractive alternative to public facilities, which does, in fact, lessen the demand on public facilities.

Although facilities within multi-family residential projects do not generally offer active recreation areas that reduce the dependency upon municipal facilities to a significant extent, they do provide a variety of active and passive recreation opportunities. To some extent, this has been dictated by the need for the housing market to be competitive and to provide amenities that have come to be expected in condominium and apartment living, and to some extent dictated by the zoning requirement for outdoor living space to be provided. Consequently, this adds some elasticity to the availability of recreation resources and helps maintain a sense of openness, even in the higher-density residential areas of the Community.

4.10.4.4 REGULATORY SETTING

Park Standards

The Open Space Element of the City's General Plan utilizes standards recommended by the NRPA as a basis for comparison to evaluate recreational needs in Beverly Hills.⁸ The NRPA standards listed in the element are 2.5 acres of neighborhood parkland and 2.5 acres of district or community parkland per 1,000

⁷ *Technical Background Report*, p. 4-16.

⁸ The NRPA standards are advisory only.

residents, 5.0 acres of suburban parkland per 1,000 residents and 20.0 acres of regional parkland per 1,000 residents. Regional and suburban parks (100+ acres) are not required to be within the City, but should be within a one-half hour drive of residences. All the parks within the City are considered neighborhood parks (5.0 to 20.0 acres) or mini parks (0.1 to 1.0 acre) by NRPA criteria.⁹ Regional and suburban parks are located within a one-half hour drive of the City.

Current ratios are below NRPA standards, as discussed in 4.10.4.3, **Existing Conditions**, and the ratios in 1977, at the time of adoption of the Open Space Element, were also below NRPA standards. However, the General Plan Open Space Element notes the large quantity of private recreational facilities already in existence and states that the NRPA standards are unrealistic due to the lack of space available for the development of new parkland.

Park Fees

Municipal Code Section 3-1-702 authorizes the Parks and Recreation Facilities Construction Tax of the City of Beverly Hills. Any person constructing a new building, or rebuilding, remodeling, or renovating any existing building in the City of Beverly Hills is required to pay this tax in the amount of \$6.50 for each square foot of floor area.¹⁰ The tax does not apply to the construction of parking structures or parking areas, government buildings, educational facilities, places of worship, and housing for the elderly and low-income families. The tax is payable upon issuance of any building permit. It is used solely for the acquisition, improvement, or expansion of public parks or recreational facilities.

4.10.4.5 SIGNIFICANCE CRITERIA

REC-1 The proposed project would result in a significant impact on recreation and parks if the proposed project would increase demand for the level of parks services or create a substantial need for additional parks in the area.

⁹ For purposes of this analysis, Will Rogers Memorial Park, which is 3.2 acres, is considered a neighborhood park since the NRPA does not provide a category for parks between 1.0 and 5.0 acres in size.

¹⁰ Phone conversation with Pat Agnitch, Deputy Director of Beverly Hills Recreation and Parks Department, 30 November 2006.

4.10.4.6 ENVIRONMENTAL IMPACT ANALYSIS

REC-1 The proposed project would result in a significant impact on recreation and parks if the proposed project would increase demand for the level of parks services or create a substantial need for additional parks in the area.

The proposed project would result in the construction of 120 new residential units. Based on a population factor of 2.24 persons per household,¹¹ the residential component of the project would result in the addition of approximately 269 residents to the City of Beverly Hills. Recreational amenities provided to the residents include pools and fitness facilities. In addition, approximately 47 percent of the site would be landscaped. This includes a series of gardens throughout the project site, as illustrated in **Figure 3.0-13, Illustrative Landscape Plan**, in Section 3.0, Project Description. As shown therein, new sculpture gardens are proposed adjacent to all new buildings and subtropical gardens are proposed between the Wilshire Tower and Residence A. Amenities to be included in the gardens include paved walkways, seating areas, a variety of plant materials, water features (i.e., fountains and ponds), and lighting. Plantings are proposed for building rooftops as well, including a rooftop Wisteria Garden Terrace atop the Wilshire Lobby and new executive conference center; rooftop bougainvillea gardens atop the existing ballrooms; and ornamental plantings on terraces atop the Residence A and B buildings and the Waldorf Astoria Hotel building. All landscaped areas at the ground level would be available to residents, hotel guests, and the general public. Access to rooftop gardens and terraces and the pool areas would be restricted to resident and hotel guest uses only.

Even with the inclusion of landscaping, gardens, terraces and recreational amenities in the project, project occupancy has the potential to incrementally increase the demand for existing public parks in the City. The proposed project site would be located immediately south of, and across Wilshire Boulevard from, the linear Beverly Gardens Park, which provides a popular route for walks, runs, and other forms of exercise. The proposed project may increase use of the linear park, as well as other parks in the City, but some of this demand would be offset by the private fitness facility and swimming pools provided on the project site and available to residents. These design features may lessen the demand on existing public recreational facilities.

As discussed above, the City has an existing parkland-to-resident ratio of approximately 2.14 acres of parkland for every 1,000 residents. The project-generated population increase would reduce the ratio to 2.13 acres per 1,000 residents, which represents a decrease of less than 1 percent. Therefore, this project would not substantially reduce the present parkland to resident ratio and would not require the

¹¹ 2000 U.S. Census.

expansion of existing facilities or construction of new facilities to accommodate this incremental increase in demand.

Considering the NRPA criteria for neighborhood parkland availability, the neighborhood parkland to population ratio would decrease by less than 1 percent from 2.05 to 2.04 acres per 1,000 residents. While the neighborhood parkland to population ratio would remain below the NRPA recommended standard of 2.50 acres per 1,000 residents, the project would not substantially reduce the present ratio. Furthermore, since the City does not consider NRPA standards applicable to the City's parks and recreational needs, the decrease in the neighborhood parkland to resident ratio would not be considered potentially significant.

Moreover, consistent with City requirements, the project applicant would pay the Parks and Recreation Facilities Construction Tax, which could be used to fund additional programs that compensate for substandard parkland availability. Based on total new floor area construction of approximately 631,432 square feet and a tax rate of \$6.50 per square foot, the proposed project would be required to contribute approximately \$4.1 million in Parks and Recreation Facilities Construction taxes. Based on the fact that the parkland to resident ratio would not substantially change in comparison to existing conditions, that the proposed project includes recreational amenities, and that the project would contribute to the Parks and Recreation Facilities Construction Tax, project impacts on park and recreation facilities would be less than significant.

4.10.4.7 PROJECT MITIGATION MEASURES

Since no significant project-related impacts were identified, no project specific mitigation measures are required.

4.10.4.8 CUMULATIVE IMPACTS

The potential for cumulative impacts to parks and recreation services was assessed based upon consideration of the proposed project in combination with Citywide related projects identified in Table 4.0-1, *Related Projects – City of Beverly Hills*. With implementation of the proposed project and citywide related projects, the associated increase in population would result in increased demand for and use of parks throughout the City. Citywide related projects and the proposed project would result in the addition of approximately 1,567 residents (700 units x 2.24 residents/unit) to the City of Beverly Hills. Based on a future population of 37,380 (35,813 current residents + 1,567 new residents), the parkland to resident ratio would be reduced from 2.14 to 2.05 acres for every 1,000 residents, which represents a 4 percent decrease from the current ratio.

Considering the NRPA criteria for neighborhood parkland availability, the neighborhood parkland to resident ratio would be reduced by 4 percent from 2.07 to 1.98 acres per 1,000 residents. However, since the City does not consider NRPA standards applicable to the City's parks and recreational needs, the decrease in the neighborhood parkland to resident ratio, which is already below the NRPA standard of 2.50 acres per 1,000 residents, is not considered potentially significant.

As with the proposed project, each identified related project would be subject to the Parks and Recreation Facilities Construction Tax, which would then be used by the City to fund additional programs that compensate for substandard parkland availability. Based on the availability of private recreational amenities to residents and the fact that the decrease in parkland to resident ratio is not substantial, cumulative project impacts on park and recreation facilities are considered to be less than significant.

4.10.4.9 CUMULATIVE MITIGATION MEASURES

Since no significant project impacts were identified and the project's contribution to potentially significant cumulative parks and recreation impacts would be rendered less than cumulatively considerable by contribution to the Parks and Recreation Facilities Construction Tax, impacts would not be significant and no cumulative mitigation measures are required.

4.10.4.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No unavoidable significant impacts to recreation and parks would occur.

4.10.5.1 INTRODUCTION

This section of the Draft EIR discusses public library resources within the project area. The primary resource within the project area is the Beverly Hills Public Library. This section analyzes the proposed project's impact on the local public library resulting from the anticipated increase in resident population.

4.10.5.2 METHODOLOGY

This section was prepared by evaluating the residential component of the proposed project for its potential to increase demand on existing library facilities. Information regarding existing facilities was obtained from the City of Beverly Hills General Plan Update, Technical Background Report¹ and from correspondence with the Beverly Hills Public Library.

4.10.5.3 EXISTING CONDITIONS

The City of Beverly Hills operates two libraries in the City: the 91,000-square-foot main library, located at the Civic Center at 450 North Rexford Drive, and the Roxbury Senior Library, which occupies part of a building at Roxbury Park, located at 471 South Roxbury Drive.² The locations of these two facilities relative to the project site are shown in **Figure 4.10.5-1, Location of Libraries**. At the end of fiscal year (FY) 2005–06, the main library had 313,066 items, including books, videos, DVDs, CDs, and CD-ROM software, audiocassettes, books on tape, informational pamphlets, as well as 593 magazine and newspaper subscriptions. The library has 77 full-time and full-time equivalent staff members.³

The City does not limit library use to residents of the City. At the end of FY 2005–06, the library had 46,372 registered borrowers and a total City population of approximately 35,700.⁴ Currently, about 70 percent of borrowers are non-residents mostly from within a 5-mile radius of the City.⁵ The circulation at the main library for FY 2005–06 was 517,293 in checkout usage.⁶ While the City does not use or enforce standards to measure the quality of services, the 91,000-square-foot library offers 2.54 square feet of

¹ *City of Beverly Hills General Plan Update, Technical Background Report*, prepared by EIP Associates in association with Kaku Associates, Inc. and Keyser Marston Associates, Inc., October 2005.

² Due to the limited selection at Roxbury Senior Library and the fact that its collection represents less than 1 percent of the main library's collection, this analysis focuses primarily on impacts to the main library.

³ Communication with Karen Buth, Senior Library Manager, Beverly Hills Public Library, 13 February 2007.

⁴ *Technical Background Report*, p.4-23.

⁵ Communication with Beverley Simmons, Director of Library Services, Beverly Hills Public Library, 19 December 2006.

⁶ Communication with Karen Buth, Senior Library Manager, Beverly Hills Public Library, 13 February 2007.

library space per resident, which far surpasses minimum standards used by other libraries.⁷ Therefore, according to the Beverly Hills Public Library, service is considered adequate for the existing demand.

The Roxbury Senior Library contains a small collection of approximately 2,200 items, including periodicals and newspapers, with a collection of large print and audio books. The total annual circulation for FY 2005–06 was 9,164 in checkout usage.⁸ The library is opened three hours per day, Monday through Friday, is operated by volunteers, and does not charge fines.

4.10.5.4 REGULATORY SETTING

The primary source of funding for the City's library services is the General Fund. Additional revenue is provided by library fines and fees, conference room rentals to the public at the main library, and contributions from organizations like Friends of the Library.⁹

4.10.5.5 SIGNIFICANCE CRITERIA

LIB-1 The proposed project would be considered to have a significant impact on library services if it would increase demand for the level of library services or create a substantial need for additional libraries in the area.

4.10.5.6 ENVIRONMENTAL IMPACT ANALYSIS

LIB-1 *The proposed project would be considered to have a significant impact on library services if it would increase demand for the level of library services or create a substantial need for additional libraries in the area.*

With the introduction of 120 new residential units, it is anticipated that demands for library services would increase slightly above current levels. Based on a population factor of 2.24 persons per household,¹⁰ the residential component of the project would result in the addition of approximately 269 residents to the City of Beverly Hills. This would reduce the present ratio of 2.54 square feet per capita by less than 1 percent to 2.52 square feet per capita. Any increased demand for library services may be alleviated by the presence of other libraries in the vicinity of the City, such as the Westwood Branch of the Los Angeles Public Library system, located approximately 2 miles from the project site.

⁷ Communication with Beverley Simmons, Director of Library Services, Beverly Hills Public Library, 19 December 2006. Calculation is based on a January 1, 2006 City population estimate of 35,813.

⁸ Communication with Karen Buth, Senior Library Manager, Beverly Hills Public Library, 13 February 2007.

⁹ Communication with Beverley Simmons, Director of Library Services, Beverly Hills Public Library, 19 December 2006.

¹⁰ 2000 U.S. Census.

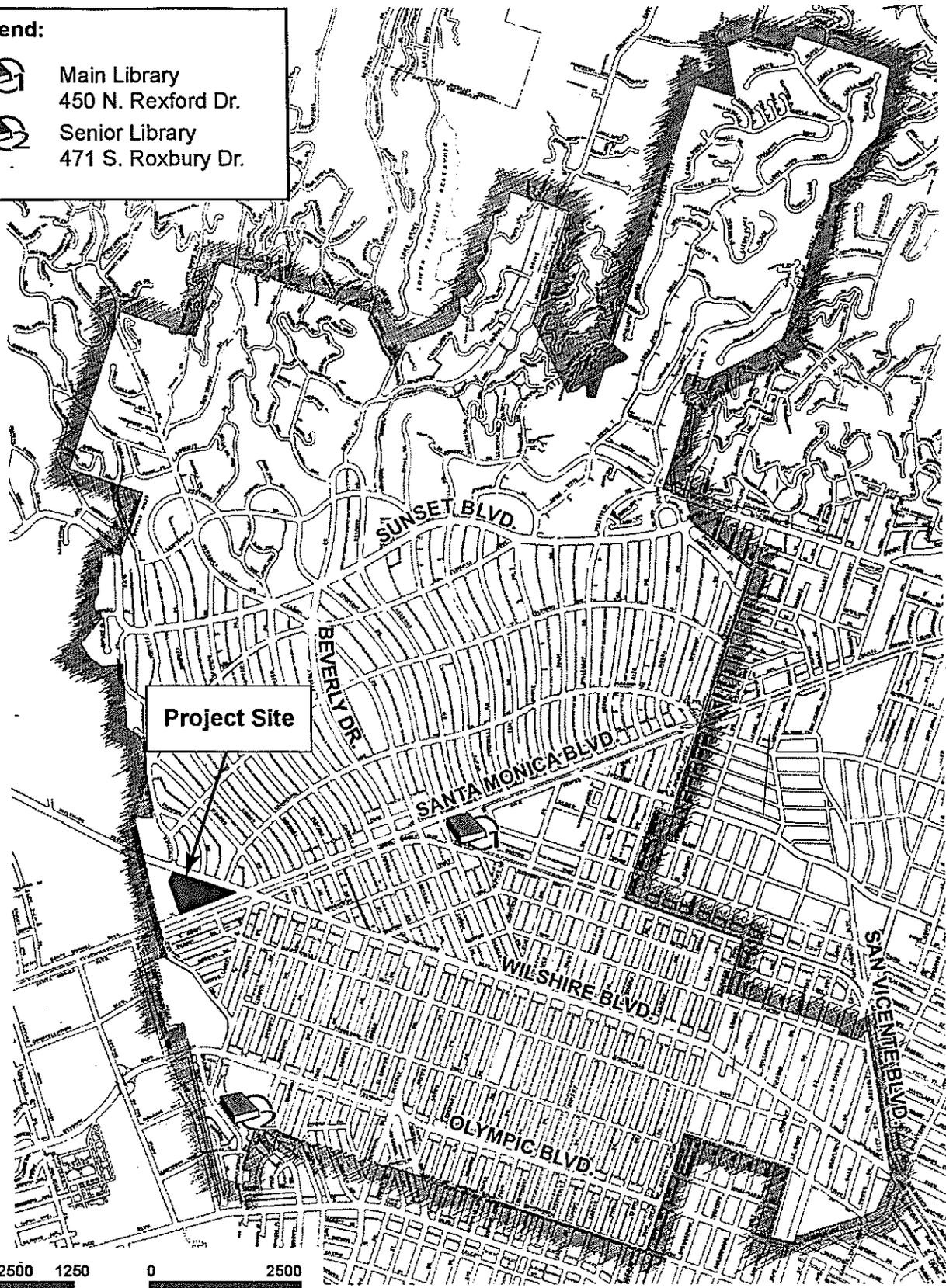
Legend:



Main Library
450 N. Rexford Dr.



Senior Library
471 S. Roxbury Dr.



Project Site



SOURCE: City of Beverly Hills, Department of Public Works - 1997, Impact Sciences, Inc. - February 2007

FIGURE 4.10.5-1

4.10.5-3

Location of Libraries

However, library usage has generally been trending down due to the impact of the internet, though, the state of the economy also influences patronage of the library's resources.¹¹

As a result of project implementation, there may be an increased demand on the library's reading program for children at the Pre-K through K level. Priority registration for the program is given to City residents and a limited number of spots are allocated for non-residents. The proposed project is anticipated to add approximately 84 students to the City, a percentage of whom would be at the Pre-K or K level. However, future residents of the proposed project would contribute revenue to the tax base that could be used to expand library services such as the reading program as allocated by the City Council's annual budget. Additionally, due to the availability of other libraries in the vicinity of the project site and the current adequacy of service at the City's main branch, the impact on library services is considered to be less than significant.

4.10.5.7 PROJECT MITIGATION MEASURES

As no project-specific significant impacts were identified, no project-specific mitigation measures are required.

4.10.5.8 CUMULATIVE IMPACTS

The potential for cumulative impacts to libraries was assessed based upon consideration of the proposed project in combination with all citywide related projects identified in Table 4.0-1, Related Projects – City of Beverly Hills. Citywide related projects and the proposed project would result in the addition of approximately 1,567 new residents (700 units x 2.24 residents/unit) to the City of Beverly Hills. Based on a future population of 37,380 (35,813 current residents + 1,567 new residents), the library size to resident ratio would decrease to 2.43 square feet per capita, or by approximately 4.3 percent, from the current ratio. All future residents of the related projects would contribute revenue to the tax base that could be used to expand library services. Based on this marginal decrease and the fact that the City Public Library determines the level of service to be adequate, the cumulative impact of the proposed project in combination with citywide related projects on library services is considered less than significant.

4.10.5.9 CUMULATIVE MITIGATION MEASURES

Since no significant cumulative impacts were identified, no cumulative mitigation measures are required.

¹¹ Communication with Beverly Simmons, Director of Library Services, Beverly Hills Public Library, 19 December 2006. When the economy is down, individuals are more likely to borrow books, periodicals, audiovisual items, etc., from libraries rather than purchase them. The reverse takes place when the economy is up.

4.10.5.10 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No unavoidable significant impacts to library services would occur.