



STAFF REPORT
CITY OF BEVERLY HILLS

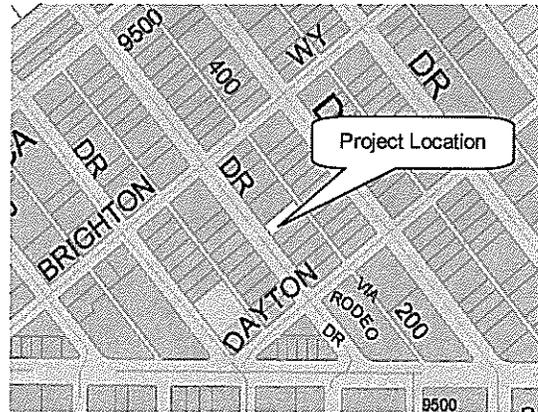
**For the Planning Commission
Meeting of December 11, 2008**

TO: Planning Commission

FROM: Michele McGrath,
Assistant Planner

THROUGH: Jonathan Lait, AICP,
City Planner

SUBJECT: A request for a Development Plan Review Permit to allow construction of an addition of 4,435 square feet of retail commercial space to an existing commercial building and a request for participation in the City's In-Lieu Parking District with the purchase of 20 parking spaces for the property located at 332 North Rodeo Drive.



RECOMMENDATION

It is recommended that the Planning Commission request a resolution approving the proposed project and its associated Development Plan Review Permit and In-Lieu Parking request with conditions including the mitigation measures as outlined in the Mitigated Negative Declaration and any other conditions as discussed by the Commission for review at the January , 2009 Planning Commission meeting.

EXECUTIVE SUMMARY

A Development Plan Review (DPR) application and request to participate in the City's In-Lieu Parking District has been submitted for the construction of an approximately 4,435 square-foot, 3-story commercial addition at the rear of the property located at 332 North Rodeo Drive. The first level of the proposed building would maintain parking and the two floors above would contain retail/service uses.

GENERAL INFORMATION	
Applicant	Milan Lojdi, Architect
Project Owner	Marc Ittah
Zoning District	Commercial (C-3)
Permit Streamlining Act Deadline	December 15, 2008

PROJECT DESCRIPTION AND AREA CHARACTERISTICS

Site Background. The subject site is located on the east side of Rodeo Drive, a well-know retail shopping street in the heart of the City’s commercial business area known as the “Business Triangle.” The adjacent buildings are two and three-story commercial buildings with an emphasis on high-end retail businesses on the ground floor. The properties immediately north and south of the subject site are developed with two-story commercial buildings. Access to the site is provided by a commercial alley at the rear and a City parking garage is located directly across the alley from the subject site. Rodeo Drive is bordered by major boulevards, Santa Monica Boulevard to the north and Wilshire Boulevard to the south.



Project Description. The project consists of the addition of 4,435 square feet of retail commercial space to an existing, 7,800 square-foot retail commercial building, known as the Anderton Court Shops, designed by preeminent American architect Frank Lloyd Wright, built in 1953 and listed in the National Register of Historic Places. The existing historic building is a 40’ high, three-story concrete building plus penthouse with six

small shops. The proposed addition would be built as a three-story (40' high) commercial building at the rear of the existing building, over the rectangular space now used for surface parking at the rear alley. The addition would be connected to the existing building in the back at elevator access points. The existing surface parking lot at grade behind the existing building would be maintained but reconfigured to allow a handicapped-accessible parking space and a van-loading zone, reducing the parking spaces from 14 to seven. The addition would be used for retail/service uses as required by the Beverly Hills Zoning Code for projects requesting in-lieu parking. The addition could be accessed from Rodeo Drive through new small hallways carved out of existing retail space in levels one through three of the existing building that connect to elevators and elevator lobbies included in the new addition.

The existing historic building will be maintained with only minor work performed so parking must be provided only for the addition which requires 13 parking spaces. The existing surface parking lot accessed from the rear alley contains 14 substandard parking spaces (8' wide x 17' long). The applicant is required to add a handicapped-accessible space (9' wide) and a van loading area (25' long x 10' wide) in this surface parking area, displacing seven of the 14 existing parking spaces. The applicant is requesting that the 13 new parking spaces as well as the seven displaced parking spaces (total of 20 spaces) be provided through the City's in-lieu parking program.

PUBLIC NOTICE AND COMMENTS

Notice of the proposed project and public hearing was mailed on December 1, 2008 to all property owners and residential tenants within a 300-foot radius of the property, and all single-family zoned properties within a 500-foot radius of the exterior boundaries of the subject property. The notice of completion of the Mitigated Negative Declaration and notice of this hearing was published in the *Beverly Hills Courier* on Friday, November 28, 2008 and in the *Beverly Hills Weekly* on Thursday, December 4, 2008. As of the date of preparation of this staff report, staff has received no inquiries or comments regarding the project.

ENVIRONMENTAL DETERMINATION

In reviewing the proposed project for potential environmental impacts, an initial environmental assessment was conducted in compliance with the authority and criteria contained in the California Environmental Quality Act (CEQA), the state CEQA Guidelines, and the environmental regulations of the City (Initial Study checklist attached). A Mitigated Negative Declaration has been prepared. The Notice of Intent to adopt a Mitigated Negative Declaration was posted and published in conformance with the CEQA noticing requirements. In addition, the notice of intent to adopt a mitigated negative declaration will be posted with the Los Angeles County Clerk on

December 8, 2008. The Initial Study/Mitigated Negative Declaration is being circulated for public review and the public review comment period will end December 28, 2008. To date, no comments have been received.

The Initial Study/Mitigated Negative Declaration evaluated the project for impacts in the sixteen (16) required environmental areas, including, but not limited to Cultural Resources and Transportation/Traffic, and also for the cumulative impacts associated with the proposed project in conjunction with other planned projects in the foreseeable future. The Initial Study/Mitigated Negative Declaration indicated that the project would not result in a potentially significant impact in any of the 16 impact areas except for Cultural Resources. An historic impact report was prepared by historic consultant Chattel Architecture, dated December 18, 2007 (attached). After analyzing the conceptual project plans for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards), the consultant concluded that the proposed work conforms to the Secretary's Standards and therefore would have a less than significant impact with implementation of required mitigation under CEQA.

The consultant identified two sets of recommendations; those that relate to the CEQA requirements pursuant to the addition and those that would rehabilitate the historic building so as to more closely resemble the original design. The first set has been incorporated as a mitigation measure in the Mitigated Negative Declaration and the second set is proposed as a condition of the project.

CEQA Mitigation Measure: Include the following design and building elements as an essential or priority part of the proposed program for the new addition:

1. Design and install the new elevator at the addition to provide for access to and from Rodeo Drive on the west elevation. The elevator may be located immediately adjacent to the east elevation of the historic building, limited openings in the historic building may be added to allow for elevator access at each floor elevation, but avoid any openings into the character-defining hexagonal-shaped stair in the historic building.
2. Implement access points to the new elevator either directly in retail lease space or as tenancies change. Develop a narrow corridor system within the south retail lease spaces at each level to provide direct elevator access. It is anticipated that the elevator may have as many as six stops, three in the historic building and three in the new building, including the ground level parking.
3. Do not use the existing stair in the historic building as the second means of egress from the addition. This will avoid code-required upgrades of the stair and allow for its continued use under provisions of the California Historical Building Code.
4. Incorporate a chase in the new elevator tower to accept new mechanical, electrical and plumbing equipment as the historic building is upgraded in the future.

5. Restore existing steel sash windows in the east elevation of the historic building. Ensure all windows are in good operating condition, working as intended historically.
6. Develop and implement a property-wide signage program and policy to be incorporated in tenant leases. The new signage program and policy would address existing signage as tenants change and allow for appropriate, compatible tenant signage for the new addition.

Proposed Project Condition: To further reduce impacts of new construction on the historic building implement the following recommendations:

1. Prepare photo documentation of the east elevation and character-defining stair of the historic building using large format archival quality processes. At least five photographs of four by five inch negatives and eight by ten inch prints shall be prepared and submitted to the Beverly Hills Public Library after acceptance by the Planning Department.
2. Restore the central spire to its original appearance including electrical lighting, finishes and finial or mast. Restore fascia and soffit to original appearance including electrical lighting and finishes.
3. Remove existing pierced metal false parapet screening mechanical equipment. Either relocate this existing element east as far as possible, following the shape of the roof footprint, paint it a darker color, or redesign it entirely to allow the leading edge of the south roof area to read as a thin horizontal member as intended.
4. Redesign and replace guardrails at the south lower and grade levels and north third floor levels to not detract from the historic character of the property. All glass or thin wire cable systems may be appropriate.
5. All future alteration of the exterior of the historic building and the addition will be required to be reviewed by the Architectural Commission.

The Initial Study/Mitigated Negative Declaration includes a Traffic Study based on current City standards that evaluates the proposed project's impact on local circulation and parking supplies. The study concludes that the project will not result in a significant impact.

No other impacts are anticipated from the establishment of the project.

ANALYSIS

Development Plan Review Permit

Pursuant to Section 10-3-3104 "Standard of Review of Development Plan Review Applications", the Planning Commission shall approve a development plan review application only if it makes all of the following findings:

1) The proposed plan is consistent with the general plan and any specific plans adopted for the area.

The proposed project meets all zoning requirements and has been determined to be consistent with the requirements and guidance of the General Plan for commercial uses located within the Business Triangle. The subject site is surrounded by commercial development, and the proposed project would therefore be a harmonious addition to the area. The proposed project is consistent with any specific plans adopted for the area.

2) The proposed plan will not adversely affect existing and anticipated development in the vicinity and will promote harmonious development of the area.

As discussed in Finding 1 above, the proposed project is consistent with the development standards established in the City's Municipal Code and General Plan. Existing uses along North Rodeo Drive consist of commercial buildings between one and three stories in height, which contain uses such as retail, restaurant, and office space.

The existing development on the site is considered an historical resource under CEQA; therefore, the proposed project must be analyzed for conformance with the Secretary's Standards (see Environmental Determination above). An historic analysis for the project by Chattel Architecture recommended mitigation measures for the project. The CEQA mitigation measures include a list of building design elements that have all been incorporated into the project by the applicant except #6 (prepare a unified sign program for the building) which would be part of the Architectural Commission's review of the project. The historic consultant proposed a second set of recommendations that would require minor historic rehabilitation work on the existing building so it more closely resembles the original design. Staff is proposing these recommendations be made conditions of project approval. Implementation of the mitigation measures and project conditions would ensure that the proposed development would not adversely effect the existing development on the site.

Construction of the proposed project is not anticipated to adversely affect existing and anticipated development on the adjacent, commercially-zoned properties, as the project would be consistent with the existing commercial uses.

- 3) 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.**

As proposed, the project meets all zoning requirements, including use, configuration, location, density, and height. Additionally, the subject site is located a minimum of 500 feet from the nearest properties zoned for multi-family residential uses. Based on the proposed project's location and adherence to the BHMC, the project is not expected to significantly and adversely interfere with the use and enjoyment of residential properties in the vicinity of the subject property.

- 4) The proposed plan will not create any significantly adverse traffic impacts, traffic safety hazards, pedestrian-vehicle conflicts, or pedestrian safety hazards.**

As part of the application for Development Plan Review the applicant prepared a traffic and parking study to analyze any potential impacts that might be generated by vehicles associated with the proposed project. The traffic study reviewed the number of vehicle trips expected to be generated by the project, and found that, based on existing traffic volumes and infrastructure capacities, the project would not generate any significant impacts related to traffic. The information contained in the traffic analysis was reviewed and confirmed by the City's traffic engineers, and the project is therefore not expected to generate any significantly adverse traffic impacts or traffic safety hazards.

- 5) The proposed plan will not be detrimental to the public health, safety or general welfare.**

The project has been designed to be consistent with surrounding development, and compatible with the existing retail and office uses along North Rodeo Drive. Because the project has been designed in conformance with the BHMC, and based on the discussions and analysis in Findings 1-4 above, the proposed project is not anticipated to be detrimental to the public health, safety, or general welfare, and staff feels that the finding could be made to support the project.

In-Lieu Parking

Pursuant to Section 10-3-3308 "Standard of Review", the Planning Commission shall approve an application for participation in the In-Lieu Parking District only if the Commission makes the following findings:

- A) Participation in the in-lieu parking district, as approved, will not adversely affect existing and anticipated development in the vicinity and will promote harmonious development of the area.**

The proposed project is consistent with the General Plan and Municipal Code. Although approval of the in-lieu parking request would generate additional demand on the existing parking facilities, the parking study prepared by the applicant suggests that a sufficient number of parking spaces are available both on-street and in existing public parking structures to accommodate the requested 20 in-lieu parking spaces.

The City's Parking Operations Division reviewed a previous version of the parking study that included an analysis of the City parking structure at 9510 Brighton Way. The Director of that Division recommended that the study should include an analysis of parking availability at the City's parking structure at 440 North Camden Drive as that structure has more parking availability and is in close proximity to the project. The traffic consultant revised the study accordingly and the study concludes there is sufficient parking availability in that structure.

The peak parking demand occurs between the hours of 12:00 p.m. and 2:00 p.m., but a minimum of 150 parking spaces remain available at all times at the 440 North Camden Drive parking structure, an amount sufficient to accommodate the proposed project. Because the project is in compliance with the General Plan and Municipal Code, and has been found not to generate an adverse impact on existing parking facilities, it is anticipated that participation in the in-lieu parking district would not adversely affect existing and anticipated development in the vicinity of the project site, and will promote harmonious development of the area.

B) Participation in the in-lieu parking district, as approved, will not create any significantly adverse traffic safety impacts, pedestrian-vehicle conflicts, or parking impacts.

Per City review and as discussed in the parking and traffic study prepared by the applicant, and in Finding A above, sufficient information is available to demonstrate that participation in the in-lieu parking district would not generate significantly adverse impacts related to traffic safety, pedestrian-vehicle conflicts, or parking. The project is not expected to impact traffic safety due to the fact that sufficient parking is available to accommodate the proposed project. Additionally, existing signage and roadways are in place to direct traffic and accommodate customers, while limiting the possibility of traffic safety impacts.

It is expected that customers of the proposed retail uses would be frequenting other buildings within the Business Triangle, in addition to the project site, and that the amount of parking demand generated specifically by the proposed project would be minimal, and therefore would not generate any significantly adverse parking impacts.

C) Participation in the in-lieu parking district will not be detrimental to the public health, safety and welfare.

As discussed in Findings A and B above, participation in the in-lieu parking district is not expected to create any significant adverse traffic safety impacts, pedestrian-vehicle conflicts, or parking impacts. Additionally, participation in the in-lieu parking district is not anticipated to adversely impact existing or future development, and therefore would not be detrimental to the public health, safety and welfare.

RECOMMENDATION

Based on the foregoing analysis and pending the information and conclusions that may result from testimony received at the public hearing and Planning Commission

deliberations, staff recommends that the Planning Commission request a resolution approving the project with the following conditions::

1. A total of 20 in-lieu parking spaces shall be purchased by the applicant.
2. Any use occurring on the second or third floors of the addition shall comply with §10-3-3303 (Eligible Uses) of the BHMC, as the in-lieu parking is only available to uses specified in the BHMC.
3. The project shall incorporate the mitigation measures outlined in the Mitigated Negative Declaration.
4. The project shall incorporate the following recommendations of the historic consultant to rehabilitate the existing historic building:
 1. Prepare photo documentation of the east elevation and character-defining stair of the historic building using large format archival quality processes. At least five photographs of four by five inch negatives and eight by ten inch prints shall be prepared and submitted to the Beverly Hills Public Library after acceptance by the Planning Department.
 2. Restore the central spire to its original appearance including electrical lighting, finishes and finial or mast. Restore fascia and soffit to original appearance including electrical lighting and finishes.
 3. Remove existing pierced metal false parapet screening mechanical equipment. Either relocate this existing element east as far as possible, following the shape of the roof footprint, paint it a darker color, or redesign it entirely to allow the leading edge of the south roof area to read as a thin horizontal member as intended.
 4. Redesign and replace guardrails at the south lower and grade levels and north third floor levels to not detract from the historic character of the property. All glass or thin wire cable systems may be appropriate.
 5. All future alteration of the exterior of the historic building and the addition will be required to be reviewed by the Architectural Commission.


Michele McGrath
Senior Planner

Planning Commission Staff Report
332 North Rodeo Drive
December 11, 2008

Attachments:

1. Initial Study and Mitigated Negative Declaration
2. In-Lieu Parking Study (traffic and parking study), Coco traffic Planners
3. Historic Impact Report, Chattel Architecture

Attachment 1

Initial Study and Mitigated Negative Declaration

ENVIRONMENTAL INITIAL STUDY CHECKLIST FORM

The following Environmental Checklist and discussion of potential environmental effects were completed in accordance with Section 15063(d)(3) of the *California Environmental Quality Act (CEQA) Guidelines* (October 1998) and recent case law to determine if the project may have any potentially significant effect on the environment.

1. Project title: Anderton Court Shops Building Addition

2. Lead agency name and address:

City of Beverly Hills
455 North Rexford Drive
Beverly Hills, California 90210

3. Contact person and phone number: Michele McGrath, Senior Planner, 310.285.1135

4. Project location: 332 North Rodeo Drive, Beverly Hills, CA

5. Project sponsor's name and address:

Marc Ittah, Owner
9538 Brighton Way
Beverly Hills, CA 90210
310.285.9701

6. General Plan designation: Commercial

7. Zoning: C-3

8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The project consists of the addition of 4,435 square feet of retail commercial space to an existing, 7,800 square-foot concrete, retail commercial building, known as the Anderton Court Shops, designed by preeminent American architect Frank Lloyd Wright, built in 1953 and listed in the National Register of Historic Places. The project involves a Development Plan Review Permit (DPR) for the construction of the addition and an In-Lieu Parking Permit to contribute to a parking fund rather than provide all Zoning Code-required parking onsite. The existing building, containing six small shops, is located at 332 North Rodeo Drive, the famed portion of Rodeo Drive in Beverly Hills known for luxury shops, hotels and restaurants. The existing building is approximately 40 feet tall, not including a spire at its crown, and is directly adjacent to other similarly-sized commercial retail-office buildings. The proposed addition would be built as a three-story (40' high) commercial building at the rear of the existing building, over the rectangular space now used for surface

Environmental Initial Study

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED (Continued):

November 28, 2008

parking at the rear alley. The addition would be connected to the existing building in the back at elevator access points. The existing surface parking lot at grade behind the existing building would be maintained but reconfigured to allow a handi-capped-accessible parking space and a van-loading zone (25' long x 10' wide), reducing the parking spaces from 14 to seven. The addition would be used for retail/service uses as required by the Beverly Hills Zoning Code for projects requesting in-lieu parking. The addition could be accessed from Rodeo Drive through new small hallways carved out of existing retail space in levels one through three of the existing building that connect to elevators and elevator lobbies included in the new addition.

9. Surrounding land uses and setting: Briefly describe the project's surroundings:

The subject property consists of an existing 40' high, three-story concrete commercial retail building plus penthouse with six small shops. The adjacent buildings are also two and three-story commercial-retail buildings with an emphasis on high-end retail businesses on the ground floor. The property is in the middle of Rodeo Drive, a well-know retail shopping street in the heart of the City's commercial business area known as the "Business Triangle." Rodeo Drive is bordered by major boulevards, Santa Monica Boulevard to the north and Wilshire Boulevard to the south.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement.)

None.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology / Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input type="checkbox"/> Hydrology / Water Quality | <input type="checkbox"/> Land Use / Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population / Housing |
| <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation / Traffic |
| <input type="checkbox"/> Utilities / Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | |

DETERMINATION: (To be completed by the Lead Agency)

Environmental Initial Study

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED (Continued):

November 28, 2008

On the basis of this initial evaluation:

- 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 revisions in the project have been made by or agreed to by the project proponent. 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.

Michele McGrath
Signature

November 28, 2008
Date

Michele McGrath
Printed Name

City of Beverly Hills
For

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial

Environmental Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS (CONTINUED):

September 19, 2007

evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
- 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
- 9) The explanation of each issue should identify:
 - a) the significance criteria or threshold, if any, used to evaluate each question; and
 - b) the mitigation measure identified, if any, to reduce the impact to less than significance

Issues:

	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. <u>AESTHETICS</u> -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS (CONTINUED):

September 19, 2007

Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>II. AGRICULTURE RESOURCES -- 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 Dept. of Conservation as an option model to use in assessing impacts on agriculture and farmland. Would the project:</p>				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:</p>				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS (CONTINUED):

September 19, 2007

Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IV. <u>BIOLOGICAL RESOURCES</u> -- 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Environmental Initial Study

EVALUATION OF ENVIRONMENTAL IMPACTS (CONTINUED):

September 19, 2007

Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
V. <u>CULTURAL RESOURCES</u> -- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VI. <u>GEOLOGY AND SOILS</u> -- 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? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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EVALUATION OF ENVIRONMENTAL IMPACTS (CONTINUED):

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Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VII. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
VIII. <u>HYDROLOGY AND WATER QUALITY</u> -- Would the project:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm-water drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IX. <u>LAND USE AND PLANNING</u> - Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. <u>MINERAL RESOURCES</u> -- 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XII. 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. PUBLIC SERVICES -- Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XIV. RECREATION --				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XV. TRANSPORTATION/TRAFFIC -- Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVI. UTILITIES AND SERVICE SYSTEMS -- Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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Issues:	Potentially Significant	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XVII. MANDATORY FINDINGS OF SIGNIFICANCE --				
a) Does the project 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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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DISCUSSION OF ENVIRONMENTAL EVALUATION:

I. AESTHETICS.

- a.-c. The proposed addition would be built over an existing surface parking lot at the rear of an existing commercial building along a service alley. The project has been designed to meet height, setback, density and other municipal code requirements. The addition would not be visible from the street. The proposed addition is compatible with the existing surrounding commercial development, much of which is built out to property lines as allowed by Code. The project is subject to review and approval by the City's Planning and Architectural Commissions which will help to ensure that the proposed exterior changes maintain a high standard of visual quality. There are no scenic vistas of significance nor scenic highways that would be affected by the proposed project.

- The project may generate some light at night but not to a significant degree. The project is subject to review and approval of the City's Architectural Commission and any proposed exterior lighting will be reviewed. The project must comply with community ordinances that limit the amount of spillover light relative to the ambient. In general, there are no aspects of the project that would result in substantial new light or glare that would adversely affect daytime or nighttime views in the area to a significant degree.
- d.

II. AGRICULTURE RESOURCES.

The project site is located in an urbanized area and there are no significant plots of rural land in the vicinity; therefore, the project is not expected to have any significant impacts to agricultural resources.

III. AIR QUALITY.

- a. The project is consistent with all local and regional planning standards on which the air quality plan was based and the project exceeds none of the thresholds of potential significance. As such, the project does not appear to conflict with or obstruct the implementation of the AQMP.
- b. c. Recent monitoring data show recurring violations of both the federal and State hourly standard for ozone and State standard for PM₁₀. First-

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stage smog alerts have been rare in recent years at nearby monitoring stations. While the summer ozone levels are occasionally unhealthful for all receptor populations, they are lower than inland communities. Levels of primary automobile pollutants, such as CO, have rarely exceeded their standards in recent years. In general, data shows that improvement has occurred throughout the 1990s in the western coastal portions of the Los Angeles Basin. However, desirable levels have not yet been attained for some pollutants.

No federal, state or regional air quality agency has adopted a methodology or quantitative threshold that can be applied to evaluate the significance of an individual project's contributions to CHG (California greenhouse gas) emissions, such as the quantitative thresholds that exist for criteria pollutants. Currently-available models lack the precision to evaluate global climate change implications of individual projects.

The project as proposed would not exceed any of the South Coast Air Quality Management District's (SCAQMD) thresholds of potential significance. It is therefore not expected to violate any air quality standard, contribute substantially to any air quality violation, or result in a cumulatively considerable net increase of any criteria pollutant in the South Coast Air Basin.

- d. The project is not located in the vicinity of any heavy stationary sources, nor would the project introduce any new, heavy stationary air emission sources. To the extent that the basin experiences poor air quality, the project would expose sensitive receptors to pollutants, but episodes where the one-hour and eight-hour State carbon monoxide standards are exceeded are infrequent and are not the result of the project.
- e. The project is a commercial addition that must house retail or service uses to be able to apply for the In-lieu Parking Permit and therefore does not propose or facilitate uses that are significant sources of objectionable odors.

IV. BIOLOGICAL RESOURCES.

- a., The project location is in a fully developed urban area, where there are
- b., no sizable, vacant tracts of land. No significant habitats or migratory
- d. wildlife corridors would be directly affected by the project and the project does not propose any policy changes that present significant

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impacts to endangered, threatened, or rare species or their habitats.

- c. The project involves no development in a federally protected wetland and involves no improvements that would impair or interrupt hydrological flow into such a wetland.
- e. The only trees located in the vicinity of the project site are City street trees which will not be disturbed as the project will be located at the rear of the existing building. As such, the project would not conflict with any local policies or ordinances protecting biological resources.
- f. There are no natural habitats or natural biological communities in the vicinity of the City's commercial areas. As the proposed project is not of such a scope as to pose a significant, wide-ranging effect on the natural environment, it appears to be consistent with all habitat conservation plans and natural community conservation plans that may be applicable to the area.

V. CULTURAL RESOURCES.

- a.,b. The existing building on the project site is a commercial building designed by Frank Lloyd Wright. The project involves minor alteration of the historic building and new infill construction at the rear of the subject property. The subject property is listed in the National register, is thus listed in the California Register, and is an historical Resource under CEQA (Public Resources Code Sec. 21084.1. Proposed project impacts were analyzed for conformance with the Secretary's Standards and local design guidelines. Work proposed in concept layouts conforms to the Secretary's Standards and therefore would have a less than significant impact with implementation of required mitigation under CEQA.

A report evaluating the impacts of the proposed project under applicable statutes and regulations of CEQA was prepared by Chattel Architecture and is dated December 18, 2007. That report is incorporated herein by reference.

As an historical resource has been identified, the project is reviewed for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties (Secretary's Standards). CEQA utilizes California Register criteria for identifying historical resources eligibility and provides that the effects of projects found to be "consis-

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tent with” the Secretary’s Standards “shall generally be considered mitigated below a level of significance and thus is not significant” under CEQA regulations Section 15126.4(b)(1).

Potential impacts to the historical resource and its setting should be evaluated in the context of the Secretary’s Standards and CEQA. Standard 9 states that, “New additions...or related new construction will not destroy...spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.” Standard 10 asserts, “New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.” In addition, CEQA defines substantial adverse changes to an historical resource or its immediate surroundings such that the significance of an historical resource would be materially impaired.”

As new construction is concentrated at the rear of the parcel facing the alley, does not extend higher than the historic penthouse structure and will only minimally connect to the historic building it appears to meet Secretary’s Standards 9 and 10.

In accordance with Secretary’s Standard 9, concentrating the new construction at the rear does not destroy spatial relationships that characterize the historic building. As the new building will not exceed the height of the historic building and will extend the limits of the site similar to the historic building, it appears to be compatible with the size and scale of the historic building. The new construction will be differentiated from the old and use of a smooth-troweled finish is compatible with historic materials. As required by Secretary’s Standard 10, the minimal connection of the addition to the historic building does not appear to impair the essential form and integrity of the historic building should the new construction be removed in the future.

Mitigation Measure –

Include the following design and building elements as an essential or priority part of the proposed program for the new addition:

1. Design and install the new elevator at the addition to provide for

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access to and from Rodeo Drive on the west elevation. The elevator may be located immediately adjacent to the east elevation of the historic building, limited openings in the historic building may be added to allow for elevator access at each floor elevation, but avoid any openings into the character-defining hexagonal-shaped stair in the historic building. (Included in Project Plans).

2. Implement access points to the new elevator either directly in retail lease space or as tenancies change. Develop a narrow corridor system within the south retail lease spaces at each level to provide direct elevator access. It is anticipated that the elevator may have as many as six stops, three in the historic building and three in the new building, including the ground level parking. (Included in Project plans).
3. Do not use the existing stair in the historic building as the second means of egress from the addition. This will avoid code-required upgrades of the stair and allow for its continued use under provisions of the California Historical Building Code. (included in plans; second means of egress from the addition is a second stairway in the addition)
4. Incorporate a chase in the new elevator tower to accept new mechanical, electrical and plumbing equipment as the historic building is upgraded in the future.
5. Restore existing steel sash windows in the east elevation of the historic building. Ensure all windows are in good operating condition, working as intended historically. This measure to be implemented prior to Project's receipt of Certificate of Occupancy.
6. Develop and implement a property-wide signage program and policy to be incorporated in tenant leases. The new signage program and policy would address existing signage as tenants change and allow for appropriate, compatible tenant signage for the new addition. This measure to be implemented prior to Project's receipt of Certificate of Occupancy.

The project site does not contain any known archeological resources.

- c. The proposed project is located in a developed setting that does not contain any unique geologic features or any identified paleontological resources.

- d. There is no evidence of any human remains on the project site or in the vicinity of the project.

VI. GEOLOGY AND SOILS.

- a. Seismic hazards.
 - i. There are no State designated Alquist-Priolo fault zones in Beverly Hills. There is no substantial evidence of any earthquake fault on or close to the project site. Therefore, there does not appear to be any significant potential for surface rupture.
 - ii. Southern California is a seismically active region and prone to earthquakes, which may result in hazardous conditions to people within the region. Earthquakes and ground motion can affect a wide-spread area. Nineteen individual faults or fault zones within 50 miles of the area, including the three local faults, are capable of generating earthquakes of Richter magnitude 6.25 to 8.5 (City of Beverly Hills Industrial Area Plan Draft EIR 1990). The potential severity of ground shaking depends on many factors, including the distance from the originating fault, the earthquake magnitude and the nature of the earth materials beneath the site. The most serious impacts associated with ground shaking would occur if the structures were not properly constructed according to seismic engineering standards. The existing building onsite was not constructed according to current seismic engineering standards and, due to that building's status as an historic resource, alterations to that building will be minimal. Any alterations to that building, as well as construction of the addition, will be required to adhere to the applicable building codes and undergo engineering checks in compliance with State and City standards. These necessary compliance strategies will reduce potentially significant impacts to less than significant levels.
 - iii. The project is not expected to result in any new, potentially significant, adverse impact from seismic ground failure. Although the density would be increased on the project site, the project would not facilitate new development in the City that exceeds the allowable density for that location. There is no evidence of potential seismic-related ground failure on the site. The site is not located in any mapped liquefaction area (1999 State of

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California Seismic Hazards Zone Map). Therefore, the project is not expected to have any potentially significant, adverse impact from seismic ground failure.

- iv. The City's commercial areas are located on relatively level terrain and there is no evidence of potential landslides in these areas. The City's commercial areas are not located in any mapped landslide area (1999 State of California Seismic Hazards Zone Map). Therefore, the proposed project is not expected to have any potentially significant, adverse impact from landslides.
- d. The project is not anticipated to result in impacts involving substantial soil erosion, unstable soil or expansive soils since the project involves construction on an established commercial site with an existing structure. The potential for expansive soils has not been identified and thus no significant impacts are anticipated.
- e. The community is served by a municipal waste water system and does not rely on septic tanks.

VII. HAZARDS AND HAZARDOUS MATERIALS.

- a. b. The project neither proposes nor facilitates any activity involving significant use, transport, use or disposal of hazardous materials.
- c.
- d. The project site is not on the State's Hazardous Waste and Substances Sites List and has no known history of use involving hazardous materials.
- e. f. The City's commercial areas are not located within two miles of any airport or private airstrip.
- g. The project poses no physical or operational barriers to City emergency plans.
- h. There are no significant areas of flammable brush, grass, or trees in the vicinity of the project site.

VIII. HYDROLOGY AND WATER QUALITY.

- a. The project involves no significant discharges beyond wastewater associated with ordinary commercial (retail/service) uses and will comply with all discharge requirements of State and Federal agencies.
- b. The project may result in minimal changes in absorption rates, drainage patterns or the rate and amount of surface runoff. Implementation of the project will result in a minimal increase in the amount of paved surfaces to the area. Overall, any change in groundwater recharge rates resulting from the project appears to be insignificant.
- c. d. The project would not result in changes in currents or the course or direction of water movements. While the project may contribute to storm drainage water flows, this would not affect water movements or currents, and there would not be a significant change in volume. No direct alterations to the water courses would be implemented. Changes in drainage would not be substantial enough to significantly change siltation or increase erosion. No significant impacts are anticipated.
- e. The project would result in a modest increase in commercial density that is not likely to degrade water quality and there would be little subsurface excavation as no subterranean construction is proposed. The City's Urban Runoff Mitigation Ordinance (BHMC 9-4-507) requires implementation of Best Management Practices (BMPs) for all construction sites in the City. These construction and erosion control practices would reduce the potential for significant water quality impacts from excavation and general construction. The proposed development will not result in substantial degradation of water quality. (See "b" above.)
- f. The Federal Emergency Management Agency (FEMA) classifies the City of Beverly Hills under Flood Zone C, which does not require mandatory flood mitigation enforcement. The project site is not located in a flood hazard zone (Flood Zones Map, City of Beverly Hills Technical Background Report, 2005), and therefore, would not be subject to flooding.
- g.-i. The project will not increase nor create new potential for exposure to problems associated with water related hazards such as flooding, seiche, tsunami, or mudflows.

IX. LAND USE AND PLANNING.

- a. The project would be located in an existing commercial zone and therefore would not have the effect of dividing an established community.
- b. The project is consistent with local zoning and General Plan policies. The City does not have an historic preservation ordinance; however, because the site is listed on the National Register of Historic Places, it is considered an historic resource for CEQA purposes and the proposed changes to the project site are being reviewed in accordance with that designation. The Zoning Code allows requests to pay an In Lieu Fee for parking rather than providing all Code-required parking on-site. A loading zone meeting Zoning Code requirements is proposed onsite but that location may not be the most practical and efficient location. The Planning Commission may wish to consider a variance that would allow the loading space to be located along the alley adjoining the site at the rear. The Zoning Code allows for requests for variances from the Code. Such variances require noticed public hearings. This request would be reviewed and determined by the Planning Commission at a public hearing with full public participation. The Planning Commission has the authority to place conditions on the project which they find necessary to protect the health, safety, and general welfare of the surrounding neighborhood.
- c. There is no habitat or natural community conservation plan area associated with the project site.

X. MINERAL RESOURCES.

- a. b. No mineral resource of value to the region and the residents of the State are known to be within the City's commercial areas other than petroleum, and the project proposes no policies that would have any effect on the petroleum resources located in the vicinity. The project involves no site designated for resource recovery.

XI. NOISE.

- a. b. There could be some high levels of noise during construction of the project, but construction noise is temporary and is restricted during the times of day by the City's construction noise ordinance. Given the relatively modest size of the building addition, there is only a small potential for increase in noise due to operation of the facility. Opera-

ENVIRONMENTAL INITIAL STUDY
DISCUSSION OF ENVIRONMENTAL EVALUATION
July 9, 2008

tional noise mitigation measures can be imposed by the Planning Commission as project conditions of approval to satisfy the requirements of the City's noise ordinance, should the Planning Commission find such conditions necessary.

- c.- There may be slight increase in noise from an increased level of activity on the site, but not to a significant degree. There would also be a marginal increase in noise associated with the traffic to and from the site; the increase being largely in recurrence and/or duration rather than in loudness. The traffic study, prepared by Coco Traffic Planners, Inc., estimates the project will add nine (9) new trips during the AM peak period and 19 new vehicle trips during the PM peak period.
- d.
- e., f. The City's commercial areas are not located within two miles of any airport or private airstrip.

XII. POPULATION AND HOUSING.

- a.- The project would be located in a developed commercial area and
- c. requires no significant changes to the local infrastructure to accommodate it.

XIII. PUBLIC SERVICES.

It can be anticipated that additional commercial development could have some impact on public services, particularly police and fire services. However, since the proposed development represents only a modest increase of 4,435 square feet, the project is not anticipated to have any effect upon or result in a need for new or altered maintenance of public facilities or other government services.

XIV. RECREATION.

The project would not substantially increase the use of existing neighborhood or regional parks, or recreational facilities.

XV. TRANSPORTATION/TRAFFIC.

- a. The project is not expected to result in a substantial increase in the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections. The anticipated traffic to be generated by the

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project is considered to be minimal, particularly since the project meets the allowable development standards of the City's Municipal Code and General Plan. Pursuant to the traffic analysis prepared by Coco Traffic Planners, Inc., the project will add nine (9) new trips during the AM peak period and 19 new vehicle trips during the PM peak period, which is not substantial in relation to the existing traffic load and capacity of the street system.

- b. Pursuant to the traffic analysis prepared by Coco Traffic Planners, Inc., the street system serving the subject site consists of approaches with capacities well in excess of the assumed theoretical value of 4,800 vehicles per hour. Consequently, the project's net traffic increase cannot reach the level of significant impact (1% of capacity at LOS E) at any location. As a result, the project is not expected to result in any level of service standards being exceeded.
- c. The project will not result in a change in air traffic patterns.
- d. The project does not propose any physical circulation improvements or make recommendations directly affecting vehicular right-of-way. It does not include design features such as sharp curves or dangerous intersections that would substantially increase hazards.
- e. The project neither proposes nor facilitates any physical improvements that affect access to emergency uses within or around the project area.
- f. The project will provide 7 on-site parking spaces (existing) and a van loading area in the location of the existing surface parking lot. All parking for the proposed commercial addition (13 spaces) as well as existing parking spaces that would be displaced (7 spaces), would be provided through in-lieu parking fees if the Planning Commission approves an In-Lieu Parking Permit. The provision of seven (7) onsite parking spaces, a handicapped-accessible space, a van loading area and 20 in-lieu parking spaces would meet the City's Zoning Code and adequately serve the parking needs of the project. This is further supported by the parking analysis performed by traffic and parking consultant, Coco Traffic Planners, Inc. which shows parking availability at nearby parking garages at 9510 Brighton Way and 440 North Camden Drive).
- g. The proposed project is not expected to conflict with adopted policies, plans, or programs supporting alternative transportation.

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XVI. UTILITIES AND SERVICE SYSTEMS.

- a.-e. The project will not exceed wastewater treatment requirements of the Regional Water Quality Control Board or require the construction or expansion of new or existing water, wastewater or stormwater drainage facilities. The proposed project would not result in the need for any new utilities or service systems.
- e.-f. The project will be served by existing landfills and comply with federal, state and local statutes and regulations with regard to solid waste.

XVII. MANDATORY FINDINGS OF SIGNIFICANCE.

- a. The project does NOT 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, threatened 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.
- b. The project does NOT have impacts that are individually limited, but cumulatively considerable.
- c. The project does NOT have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

SUPPORTING INFORMATION SOURCES:

Beverly Hills Municipal Code.

Beverly Hills General Plan.

Beverly Hills Official Zoning Map.

332 North Rodeo Drive Commercial Building In-Lieu Parking Study Beverly Hills - California, prepared by Coco Traffic Planners, Inc., October 2, 2008.

California Environmental Quality Act and CEQA Guidelines, prepared by CELSOC, 2008.

Geotechnical Report for Seismic Safety Element for the City of Beverly Hills, prepared by Woodward-Clyde Consultants, 1987.

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CEQA Air Quality Handbook, prepared by the South Coast Air Quality Management District, 1993.

Hazardous Waste and Substances Sites List, prepared by the California Environmental Protection Agency Hazardous Materials Data Management Program, 1998.

The Congestion Management Plan for Los Angeles County, Prepared by the Los Angeles County Metropolitan Transportation Authority, adopted December 1995.

City of Beverly Hills General Plan Update Technical Background Report. Prepared by EIP Associates, 2005.

Guidelines for Implementation of the California Environmental Quality Act, prepared by the Governor's Office of Planning and Research, 1997; updated 1998.

Seismic Hazards Zone Map, prepared by the State of California – The Resources Agency – Division of Mines and Geology, 1999.

CEQA Air Quality Handbook, prepared by the South Coast Air Quality Management District, 1993.

Endangered and Threatened Animals of California, California Department of Fish and Game, Resources Agency, October, 1996.

Endangered, Threatened and Rare Plants of California, California Department of Fish and Game, Resources Agency, January, 1996

"Historic Impact Report for 332 North Rodeo Drive," prepared by Chattel Architecture, Planning & Preservation, Inc., December 18, 2008

Attachment 2
In-Lieu Parking Study
Coco Traffic Planners

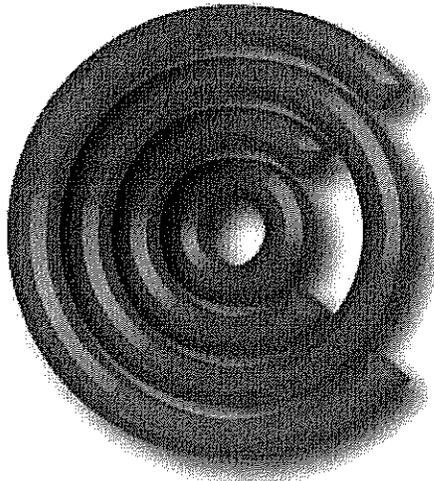
**332 NORTH RODEO DRIVE
COMMERCIAL BUILDING
IN-LIEU PARKING STUDY
BEVERLY HILLS - CALIFORNIA**

Prepared for:

**MILAN LOJDL ARCHITECTS
Beverly Hills, California**

Revised on:

December 4, 2008



COCO TRAFFIC PLANNERS, INC.



**332 NORTH RODEO DRIVE
COMMERCIAL BUILDING
IN-LIEU PARKING STUDY
BEVERLY HILLS - CALIFORNIA**

Prepared for:

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Revised on:

December 4, 2008

Prepared by:

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COCO TRAFFIC PLANNERS, INC.

TRAFFIC • DESIGN • PARKING • MODELING • URBAN PLANNING

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December 4, 2008

Mr. Milan Lojdl
Milan Lojdl Architects
9538 Brighton Way, Suite 326
Beverly Hills California 90210

**Subject: 332 NORTH RODEO DRIVE COMMERCIAL BUILDING IN-LIEU PARKING
STUDY - BEVERLY HILLS, CALIFORNIA**

Dear Mr. Lojdl,

As authorized, we have conducted a comprehensive parking analysis associated with your proposed commercial development located at 332 North Rodeo Drive, in the City of Beverly Hills, California. Specifically, we evaluated the level of occupancy, during two days of the week, of two public parking facilities existing in the vicinity of your development. The purpose of the analysis was to determine the adequacy of those facilities to support your proposed project's parking demand, "in lieu" of on site parking.

The general scope of work was determined through discussions with staff from the Engineering and Planning Departments of the City of Beverly Hills. For the purpose of this study it was determined that the area parking structures closest to your project site should be surveyed during one weekday within the Tuesday through Friday period of the week, and the subsequent Saturday. This report contains the findings and conclusions of our study with necessary supporting data.

PROJECT DESCRIPTION

The proposed project's site consists of a 7,625 square foot (sf) lot, located at 332 North Rodeo Drive. The lot has a 50 foot wide frontage along Rodeo Drive, and extends 152.5 feet to the alley east of that. The alley is one-way only, with a southbound direction. The lot currently is improved with a 3½ story commercial building with a gross floor area of about 7,800 sf of gross floor area. The site currently is supported by a surface parking area, located behind the building, providing 14 substandard parking stalls. Access to the parking area is provided by the above mentioned alley, which has a standard 20 foot width. Figure 1 shows the location of the subject site on a regional basis.



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SITE LOCATION MAP

The proposed expansion project pertains to the rear of the subject building, and consists of refurbishing the existing structure, and creating a larger footprint than the existing development by extending the second and the third floors over the parking lot. The project's current plans show that the building's expansion will have a net floor area of 4,435 sf, about evenly split between the second and the third floors. Specifically, the second floor will have 2,229 sf, with the balance of 2,206 sf at the third floor. This new space will consist of a mix of retail and office space, and does not include the revisions conducted in the parking area at the ground floor. The existing development's square footage was estimated at a net of about 7,638 sf. These values were used for analysis purposes.

Figure 2 shows the existing, and the proposed site plans and the parking lot, along with their relationship to the adjacent street system. As indicated in Figure 2, the existing supply of 14 substandard parking stalls will be reduced to seven stalls due to the loss of seven stalls associated with the construction of the proposed expansion, and the provision of one on-site loading space, and code-compliant handicap accessible parking space. Alley access to these stalls will be maintained.

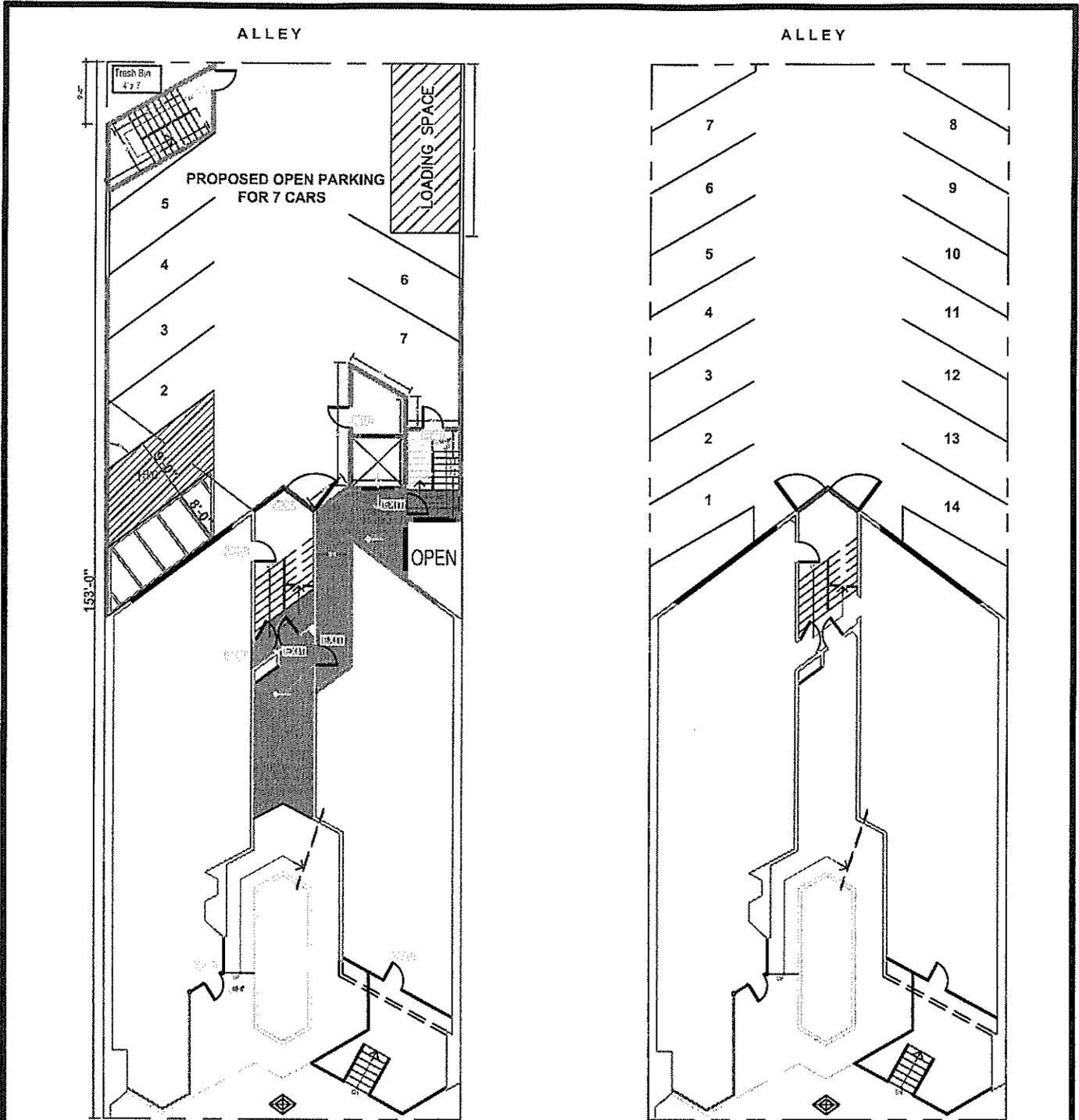
Based upon the City of Beverly Hills' Parking Code, which requires one stall per 350 sf of commercial space, the proposed project will need to provide 13 stalls for the proposed 4,435 sf expansion, in addition to the 14 existing parking stalls, for a total of 27 parking stalls. Given the loss of the seven on-site stalls mentioned earlier, it is expected that the project will satisfy the projected 20 stall parking shortage, by participating in the City of Beverly Hills In-Lieu parking program. The subject shortage will be accommodated by the existing public parking supply located within walking distance of the subject site.

Site plans and other pertinent information concerning the proposed project were provided by the project's architect, Mr. Milan Lojdl, of Milan Lojdl Architects.

DATA SOURCES

As indicated in Figure 1, several public parking facilities exist within walking distance from the proposed project's site. Parking accumulation surveys were conducted at two of those facilities, closest to the project's site. The location of the parking facilities surveyed is 9510 Brighton Way, and 440 North Camden Drive. The assumption behind this choice is that the proposed project's patrons will be willing to walk a few blocks in order to reach the site. This is a conservative assumption, as the site is located in a prime shopping area of the City of Beverly Hills, the "Golden Triangle", with a shopping center type of operations, and a high level of pedestrian traffic.





Proposed Development

Existing Development



NO SCALE



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**PROJECT SITE
 AND PARKING
 LAYOUT**

Field investigations were made by our personnel to ascertain the existing parking supply at the above mentioned parking structures, indicated in Figure 1 with a round marker. Surveys of available parking stalls were conducted at our direction at the Brighton parking structure, on: Thursday, August 14, and Saturday, August 16, 2008. The surveys at the Camden parking structure were conducted on: Thursday, September 25, and Saturday, September 27, 2008, both between 10:00 AM and 4:00 PM. Observations of the facility parking occupancy were conducted every 30 minutes.

It should be noted that additional surface public parking lots exist within walking distance from the proposed site. In addition, an extensive supply of curb parking exists within the Golden Triangle. This means that additional parking is available beyond that found within the public parking facilities surveyed. However, since no survey of the additional parking supply was required by the City, our analysis will evaluate a worst case scenario, assessing only the occupancy of the nearby parking structure.

SITE TRAFFIC GENERATION

Studies by the Institute of Transportation Engineers (ITE), Caltrans, ourselves and others have identified generalized factors which relate traffic characteristics with quantity and type of development. These traffic generation factors are useful in estimating the total future characteristics of a project yet to be constructed and occupied. Judgment is required on the part of the analyst to select the appropriate factors which best match the type of developments contemplated.

The quantity of floor area, number of employees, density of development, availability of public transportation, and regional location of the project all affect the traffic generation rate. While there are many different types of uses and many parameters upon which to estimate traffic (acreage, floor area square footage, employment, etc.) the best factors for the kind of development contemplated relate to the square footage of the commercial uses.

In order to evaluate the quantity of traffic generated by the site, ITE traffic generation factors from the 7th Edition of the Traffic Generation Manual were applied to the two land uses included in the proposed project, i.e. retail and office space, for the daily and the morning and evening peak periods. The AM and PM peak hours relate to a one-hour period within the 7:00 to 9:00 AM and the 4:00 to 6:00 PM periods respectively.

It should be noted that traffic generation surveys, conducted by our firm of other retail stores within the Golden Triangle, have shown that retail spaces in this area tend to generate traffic at rates that are significantly lower than those calculated through the factors provided by ITE equations. This is indicative of the fact that stores located



within the Golden Triangle, operate like in a shopping center environment. Hence, the ITE equations tend to overstate the traffic generation potential of smaller stores, considered individually. Our studies showed that, the traffic generation characteristics of small stores in the area are similar to those found with the ITE factors associated with larger shopping centers, which is consistent with the above mentioned considerations about the Golden Triangle traffic generation patterns. For this reason the ITE factors used in our analysis relate to the land use's "Average Vehicle Trips Ends", and are not based upon the above mentioned equations.

Table 1 shows in detail the generation factors used for analysis purposes along with the related volumes, both with an "all office", and an "all retail" scenarios for the proposed addition. The subject scenarios were included for the purpose of evaluating the proposed development's maximum traffic generation potential (worst case scenario). Specifically, the Maximum Site Traffic Generation reported in Table 1 is based upon the peak generation of either scenario, for each individual type of trips (inbound/outbound). The proposed project is expected to generate about 520 vehicle trips per day (260 inbound and 260 outbound). The AM peak was estimated at 16 vehicle trips (11 inbound and 5 outbound), The PM peak was estimated at 46 vehicle trips (22 inbound and 24 outbound).

As indicated, these are the numbers of vehicle trips generated by the proposed project. In order to estimate the quantity of traffic that the proposed project will actually add to the surrounding street system, the above volumes must be reduced by the trips associated with the site's existing development, which also are reported in Table 1. The site's existing retail was estimated to generate about 330 daily vehicle trips, (165 inbound and 165 outbound). The AM peak was estimated at 8 vehicle trips (5 inbound and 3 outbound). The PM peak was estimated at 29 vehicle trips (14 inbound and 15 outbound).

With the reductions described above, and based upon ITE traffic generation factors, the proposed project is expected to increase area traffic by about 190 vehicle trips on a daily basis (95 inbound and 95 outbound). During the AM peak the project will add 8 new vehicle trips (5 inbound and 3 outbound). The PM peak shows a total of 17 new vehicle trips (8 inbound and 9 outbound).

The street system serving the subject site consists of four-lane roadways, and intersections with two lanes, plus one left turn pocket lane per approach. These approaches have capacities well in excess of the assumed theoretical value of 4,800 vehicles per hour. Consequently, the proposed project's net traffic increase cannot reach the level of significant impact (1% of capacity at LOS E) at any location. Consequently, we can safely maintain that no significant traffic impacts will results from the development of the proposed project.



TABLE 1

**PROJECT TRAFFIC GENERATION
332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills**

LAND USE	SIZE	UNIT	LAND USE CODE	AVERAGE DAILY TRAFFIC		AM PEAK HOUR		PM PEAK HOUR					
				TE Rate (1)	Trip Ends (2)	TE Rate (1) In	TE Rate (1) Out	Trip Ends (2) In	Trip Ends (2) Out	TE Rate (1) In	TE Rate (1) Out	Trip Ends (2) In	Trip Ends (2) Out
Proposed Project													
Existing Retail	7.638	KGLA	820	42.94	328	0.63	0.40	5	3	1.80	1.95	14	15
All Office Addition	4.435	KGSF	710	11.01	49	1.36	0.19	6	1	0.25	1.24	1	5
All Retail Addition	4.435	KGLA	820	42.94	190	0.63	0.40	3	2	1.80	1.95	8	9
Max Site Traffic Generation				518		AM Total = 16		11		PM Total = 46		22 24	
Existing Project													
Existing Retail	7.638	KGLA	820	42.94	328	0.63	0.40	5	3	1.80	1.95	14	15
Existing Site Traffic Generation				328		AM Total = 8		5		PM Total = 29		14 15	
Maximum Proposed Project Net Traffic Addition				190		AM Total = 8		6		PM Total = 17		8 9	

1) TE Rate is the average number of Trip Ends generated per "SIZE" Unit (i.e. KGLA) per ITE Trip Generation Manual - 7th Edition.

2) Trip End is a one-way vehicle movement entering or leaving the traffic generator.

SITE PARKING DEMAND

Studies by the Institute of Transportation Engineers (ITE), ourselves and others have identified generalized factors which relate parking characteristics with the quantity and type of development. These parking generation factors are useful in estimating the total future parking characteristics of a project yet to be constructed and occupied. Judgment is required on the part of the analyst to select the appropriate factors which best match the type of developments contemplated.

Table 2 shows the parking generation factors used in the analysis and the resulting number of parking stalls needed to satisfy the project's parking demand. As reported in Table 2, the proposed project will have a peak parking demand of 18 stalls. This represents the estimated project's peak number of parking stalls occupied. Table 2 also reports the proposed project's parking needs based upon the City of Beverly Hills Parking Code, along with the actual parking supply, reported for comparison purposes.

The City Code requires the proposed development to provide 27 stalls. The proposed project currently is planned to provide 7 parking stalls in the surface parking lot located behind the building. This constitutes a shortage of 20 parking stalls. In order to comply with the City Parking Code requirements the development will need to provide 20 additional parking stalls. As indicated earlier, it is expected that the parking shortage will be addressed through the City of Beverly Hills "in-lieu parking" program, using available parking stalls at existing public parking facilities, located within walking distance of the subject site.

It should be noted that, like most parking codes, the City of Beverly Hills' Parking Code does not distinguish between employees and patrons parking. The code mandated supply of parking stalls is designed to accommodate a development's parking needs both for employees and patrons. The requirements set forth in the code are based upon surveys of actual parking stalls occupied conducted by various entities. No distinction is made between employees and patrons' parking demand.

PARKING SURVEYS DATA AND ANALYSIS

The 9510 Brighton Way structure provides a total of 248 parking stalls, and provides parking at no charge for the first two hours of parking. Table 3A shows the results of the parking accumulation survey conducted on Thursday, August 14, broken down by the structure's levels. As reported in Table 3A, the levels' combined peak parking occupancy at the facility occurred at 1:00 PM with 216 stalls occupied, out of a total supply of 248 stalls. That is about 87 percent of supply. At that time 32 stalls, or 13



TABLE 2
PROJECT PARKING GENERATION
332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

LAND USE	SIZE	UNIT	LAND USE CODE	MAXIMUM # OF STALLS OCCUPIED		CODE REQUIREMENT		ACTUAL PARKING SUPPLY	
				(1) Pkg Rate	(2) Stalls	Pkg Rate	Stalls	(1) Pkg Rate	(2) Stalls
Proposed Project									
Existing Retail	7.638	KGLA	820	1.5	12	1.83	14	1.83	14
Commercial Expansion	4.435	KGLA	820	1.4	6	2.86	13	N/A	(7)
In-lieu Parking	4.435	KGLA	820	N/A	N/A	N/A	N/A	4.51	20
Parking Totals				1.49	18	2.24	27	2.24	27
Existing Project									
Retail	7.638	KGLA	701	1.5	12	1.83	14	1.83	14
Parking Totals				1.52	12	1.83	14	1.83	14
Proposed Project Parking Totals				18	27				
Proposed Project In-Lieu Parking				N/A	N/A				
Proposed Project Parking Grand Totals				(100%)	18	(150%)	27	(150%)	27

Note: Parking generation factors per ITE Parking Generation - 3rd Edition.

1) Pkg Rate is the average number of parking stalls occupied per "SIZE" Unit (i.e. KGLA).

2) Stalls is the maximum number of occupied parking spaces associated with the generator.

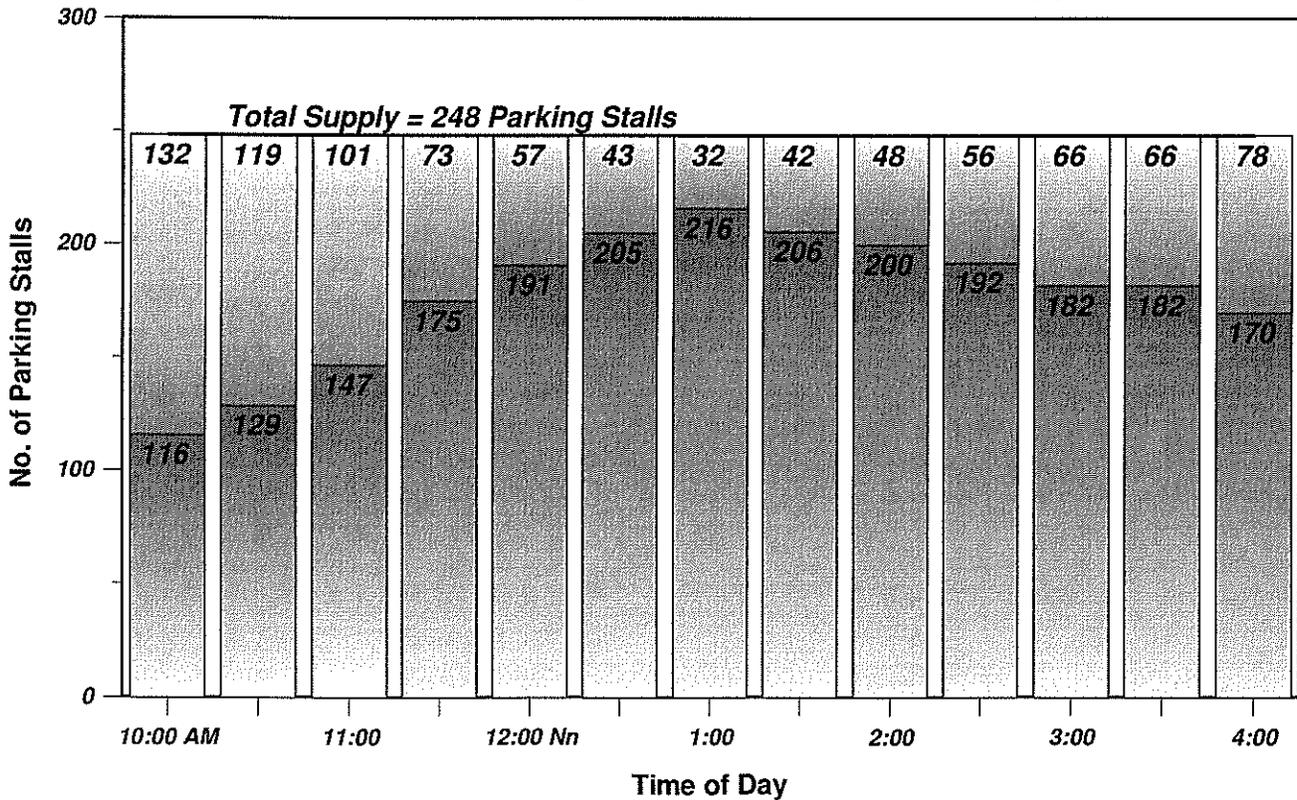
TABLE 3A

PARKING STRUCTURE ACCUMULATION SURVEY
 Thursday, August 14, 2008
 332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

SITE	9510 Brighton Way																				
FLOOR	1st West	2nd East	2nd West	3rd East	3rd West	4th East	4th West	5th East	5th West	6th East	Total										
SUPPLY	1	27	31	27	31	27	31	27	32	14	248	Stalls									
TIME START	Stalls Occupied											Stalls Occupied	% of Total	Stalls Avbl	% of Total						
10:00 AM	1	*	27	*	31	*	24	25	7	1	0	0	0	116	47%	132	* 53%				
30	1	*	27	*	30	24	27	17	3	0	0	0	0	129	52%	119	48%				
11:00	1	*	27	*	30	25	*	27	23	*	12	2	0	0	147	59%	101	41%			
30	1	*	27	*	31	*	25	*	28	*	22	25	14	1	1	175	71%	73	29%		
12:00 Nn	1	*	27	*	31	*	25	*	28	*	23	*	26	*	21	8	1	191	77%	57	23%
30	1	*	27	*	31	*	25	*	28	*	23	*	26	*	20	20	4	205	83%	43	17%
1:00	1	*	27	*	30	24	28	*	23	*	26	*	22	*	25	*	10	216	* 87%	32	13%
30	1	*	27	*	31	*	25	*	26	23	*	24	19	21	9			206	83%	42	17%
2:00	1	*	27	*	31	*	25	*	27	22	26	*	19	15	7			200	81%	48	19%
30	1	*	27	*	30	23	26	22	23	18	18	4						192	77%	56	23%
3:00	1	*	27	*	31	*	25	*	27	22	25	13	9	2				182	73%	66	27%
30	1	*	27	*	31	*	25	*	28	*	22	26	*	15	6	1		182	73%	66	27%
4:00	1	*	27	*	30	24	24	21	23	14	5	1						170	69%	78	31%
PEAK	1	27	31	25	28	23	26	22	25	10	216	87%	132	53%							

Note: The asterisk (*) indicates the occurrence of a parking peak.

9510 Brighton Way Parking Structure Accumulation - Thursday Survey
 332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills



percent of supply were available. A graphic rendering of the survey's results, is shown in the graph following Table 3A.

The 440 North Camden Drive structure provides a total of 364 parking stalls, and provides parking at no charge for the first one hour of parking. Table 3B shows the results of the parking accumulation survey conducted on Thursday, September 25, broken down by the structure's floors. As reported in Table 3B, the floors' combined peak parking occupancy at the facility occurred at 1:30 PM with 187 stalls occupied, out of a total supply of 364 stalls. That is about 51 percent of supply. At that time 177 stalls, or 49 percent of supply were available. A graphic rendering of the survey's results, is shown in the graph following Table 3B.

Similarly Table 4A shows the results of the parking accumulation survey of the Brighton parking structure, conducted on Saturday, August 16, 2008. As reported in Table 4A, the Saturday peak parking occupancy at the subject facility occurred at 3:00 PM with 205 stalls occupied. That constitutes an occupancy of about 83 percent of capacity. At that time 43 stalls, or 17 percent of capacity were available. A graphic rendering of the surveys' results, is shown in the graph following Table 4A.

Table 4B shows the results of the parking accumulation survey of the Camden parking structure, conducted on Saturday, September 27, 2008. As reported in Table 4B, the Saturday peak parking occupancy at the subject facility occurred at 12:30 PM with 124 stalls occupied. That constitutes an occupancy of about 34 percent of capacity. At that time 240 stalls, or 66 percent of capacity were available. A graphic rendering of the surveys' results, is shown in the graph following Table 4B.

In order to account for the added parking needs associated with the proposed 332 North Rodeo Drive Commercial Building, the results of the surveys for the two structures were combined, and increased by the 20 in-lieu parking stalls described above. The stalls were added for the entire day in order to evaluate a worst case scenario.

Table 5 is a summary of the Thursday parking occupancy for the two facilities surveyed, which along with the proposed project's 20 stalls in-lieu parking requirement, constitutes the structures' future peak parking occupancy. The table basically shows the surveyed facilities combined peak parking occupancy for the Thursday counts, with the above mentioned in-lieu parking requirement superimposed to those occupancies. As indicated in Table 5, the proposed project's two vicinity public parking facilities have a combined supply of 612 stalls, and will have a combined peak occupancy of 422 parking stalls, expected to occur around 1:00 PM. That constitutes an occupancy of about 69 percent of capacity. At that time the balance of 190 stalls or about 31 percent of supply still will be available. A graphic rendering of the table is shown in the graph following Table 5.



TABLE 3B

CAMDEN DRIVE PARKING STRUCTURE ACCUMULATION SURVEY
 Thursday, September 25, 2008
 332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

SITE	440 N. Camden Drive															
FLOOR	1st Floor	2nd Floor	3rd Floor	4th Floor	5th Floor	6th Floor	Roof	Total								
SUPPLY	19	62	64	64	64	62	29	364	Stalls							
TIME START	Stalls Occupied								Stalls Occupied	% of Total	Stalls Avlbl	% of Total				
10:00 AM	19	*	57	43	23	2	0	0	*	144	40%	220	*	60%		
30	19	*	59	48	31	3	0	0	*	160	44%	204		56%		
11:00	19	*	58	51	33	1	1	0	*	163	45%	201		55%		
30	19	*	60	50	33	3	0	0	*	165	45%	199		55%		
12:00 Nn	19	*	57	54	36	2	1	0	*	169	46%	195		54%		
30	19	*	60	55	40	2	0	0	*	176	48%	188		52%		
1:00	19	*	62	*	57	44	*	4	0	0	*	186	51%	178	49%	
30	19	*	60	59	*	42	5	2	*	0	*	187	*	51%	177	49%
2:00	19	*	58	51	43	3	1	0	*	175	48%	189		52%		
30	19	*	56	50	36	6	0	0	*	167	46%	197		54%		
3:00	19	*	61	46	39	7	*	1	0	*	173	48%	191		52%	
30	19	*	56	44	30	5	1	0	*	155	43%	209		57%		
4:00	19	*	54	48	34	5	0	0	*	160	44%	204		56%		
PEAK	19		62	59	44	7	2	0		187	51%	220		60%		

Note: The asterisk (*) indicates the occurrence of a parking peak.
 Note: 14 of the 1st Floor 19 stalls posted for No Parking Anytime.

440 N Camden Drive Parking Structure Accumulation - Thursday Survey
 332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

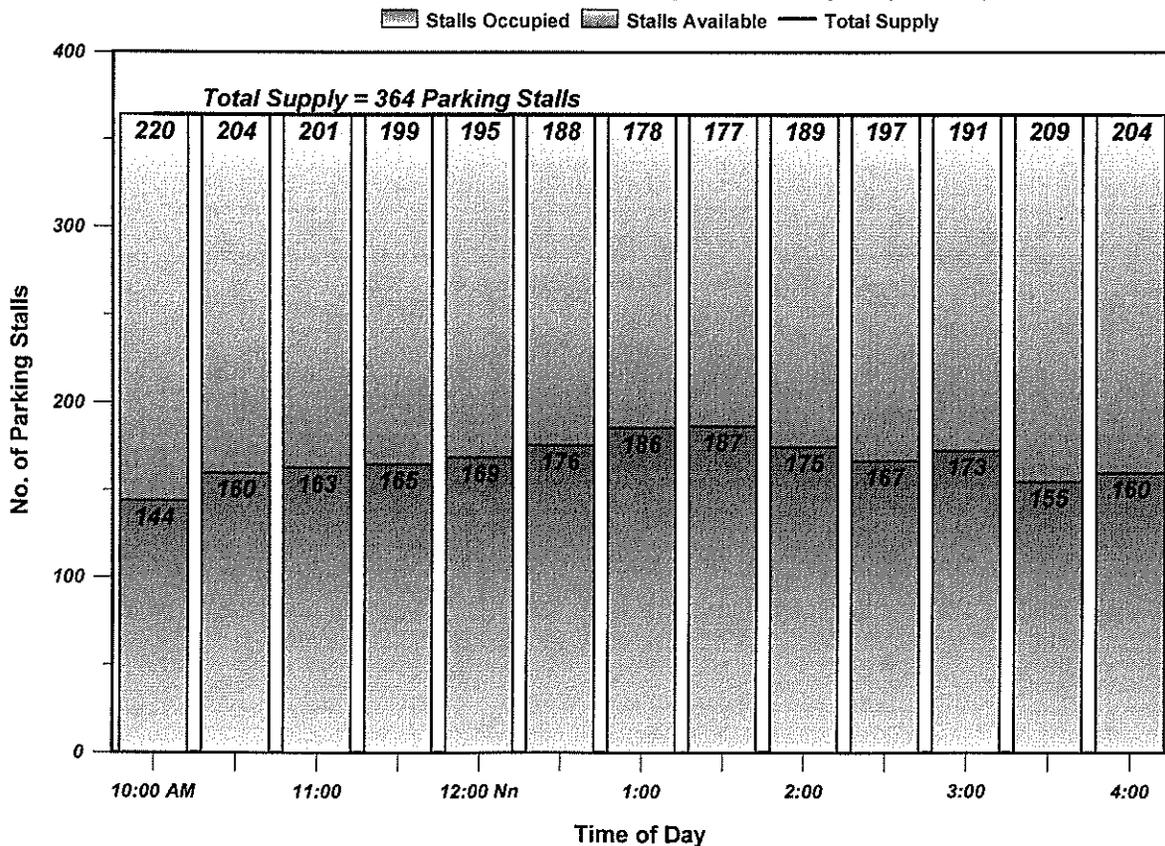


TABLE 4A

PARKING STRUCTURE ACCUMULATION SURVEY

Saturday, August 16, 2008

332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

SITE	9510 Brighton Way											Total		
FLOOR	1st West	2nd East	2nd West	3rd East	3rd West	4th East	4th West	5th East	5th West	6th East				
SUPPLY	1	27	31	27	31	27	31	27	32	14	248	Stalls		
TIME START	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	% of Total	Stalls Avbl	% of Total
10:00 AM	1	* 27	* 30	21	26	7	4	0	0	0	116	47%	132	* 53%
30	1	* 25	29	25	26	17	7	1	0	0	131	53%	117	47%
11:00	1	* 27	* 30	26	* 29	* 20	11	4	0	0	148	60%	100	40%
30	1	* 27	* 31	* 26	* 29	* 24	21	7	0	0	166	67%	82	33%
12:00 Nn	1	* 27	* 31	* 26	* 28	24	26	16	2	2	183	74%	65	26%
30	1	* 27	* 31	* 26	* 28	23	24	15	2	2	179	72%	69	28%
1:00	1	* 27	* 31	* 26	* 29	* 22	26	15	2	0	179	72%	69	28%
30	1	* 27	* 31	* 25	29	* 25	* 25	19	4	0	186	75%	62	25%
2:00	1	* 27	* 31	* 26	* 28	25	* 27	* 20	6	1	192	77%	56	23%
30	1	* 25	31	* 26	* 29	* 25	* 27	* 22	* 13	2	201	81%	47	19%
3:00	1	* 27	* 31	* 26	* 28	25	* 27	* 22	* 16	* 2	205	* 83%	43	17%
30	1	* 26	30	24	26	22	23	22	* 14	1	189	76%	59	24%
4:00	1	* 26	30	25	27	22	22	18	9	1	181	73%	67	27%
PEAK	1	27	31	26	29	25	27	22	16	2	205	83%	132	53%

Note: The asterisk (*) indicates the occurrence of a parking peak.

9510 Brighton Way Parking Structure Accumulation - Saturday Survey

332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

Stalls Occupied Stalls Available Total Supply

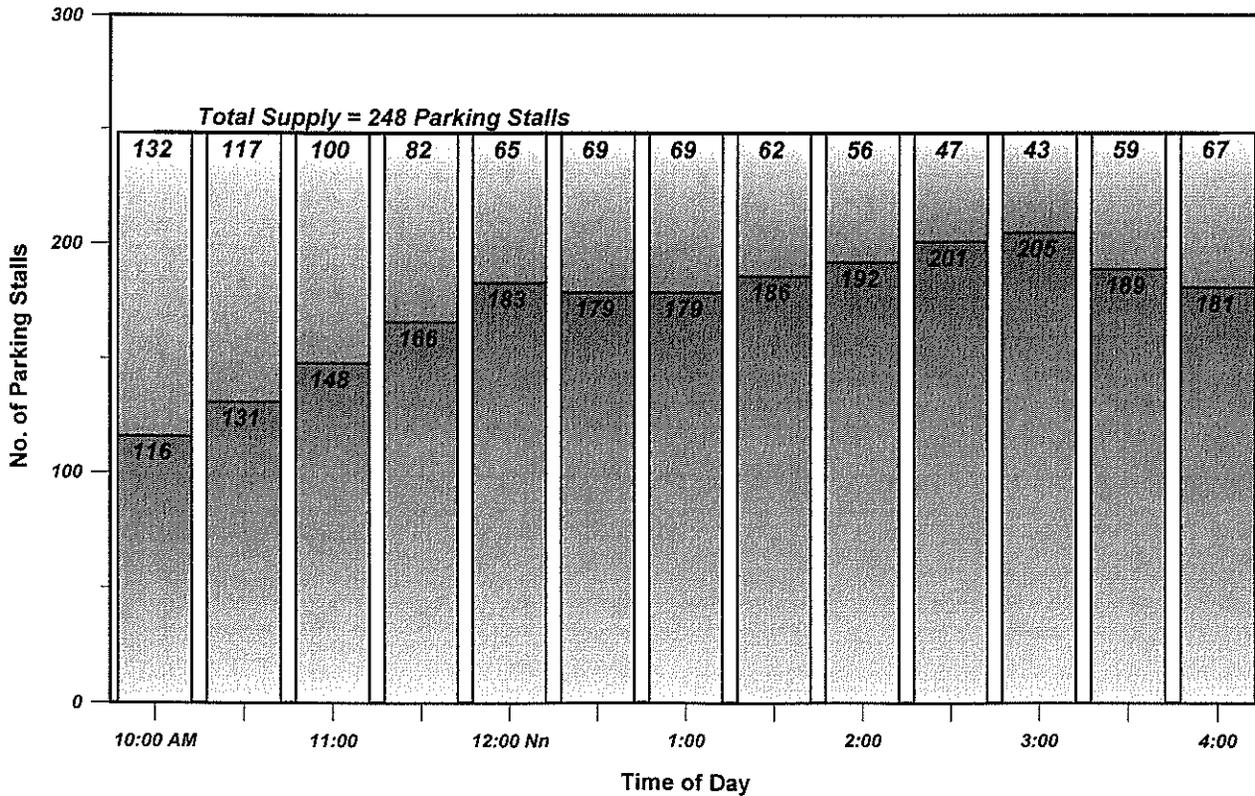


TABLE 4B

CAMDEN DRIVE PARKING STRUCTURE ACCUMULATION SURVEY
 Saturday, September 27, 2008
 332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

SITE	440 N. Camden Drive								Total			
FLOOR	1st Floor	2nd Floor	3rd Floor	4th Floor	5th Floor	6th Floor	Roof					
SUPPLY	19	62	64	64	64	62	29	364	Stalls			
TIME START	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	Stalls Occupied	% of Total	Stalls Avlbl	% of Total	
10:00 AM	19 *	50	17	1	0	0	0 *	0 *	87	24%	277 *	76%
30	19 *	51	21	2	1	0	0 *	0 *	94	26%	270	74%
11:00	19 *	53	23	2	0	0	0 *	0 *	97	27%	267	73%
30	19 *	55	24	3	1	0	0 *	0 *	102	28%	262	72%
12:00 Nn	19 *	58	26	5	2	0	0 *	0 *	110	30%	254	70%
30	19 *	60 *	33 *	9 *	3 *	0 *	0 *	0 *	124 *	34%	240	66%
1:00	19 *	59	30	8	3	0	0 *	0 *	119	33%	245	67%
30	19 *	59	31	9	3	0	0 *	0 *	121	33%	243	67%
2:00	19 *	56	32	8	2	0	0 *	0 *	117	32%	247	68%
30	19 *	55	33	8	3	0	0 *	0 *	118	32%	246	68%
3:00	19 *	53	29	8	3	0	0 *	0 *	112	31%	252	69%
30	19 *	52	20	5	3	0	0 *	0 *	99	27%	265	73%
4:00	19 *	50	18	5	2	0	0 *	0 *	94	26%	270	74%
PEAK	19	60	33	9	3	0	0	0	124	34%	277	76%

Note: The asterisk (*) indicates the occurrence of a parking peak.
 Note: 14 of the 1st Floor 19 stalls posted for No Parking Anytime.

440 N Camden Drive Parking Structure Accumulation - Saturday Survey
 332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

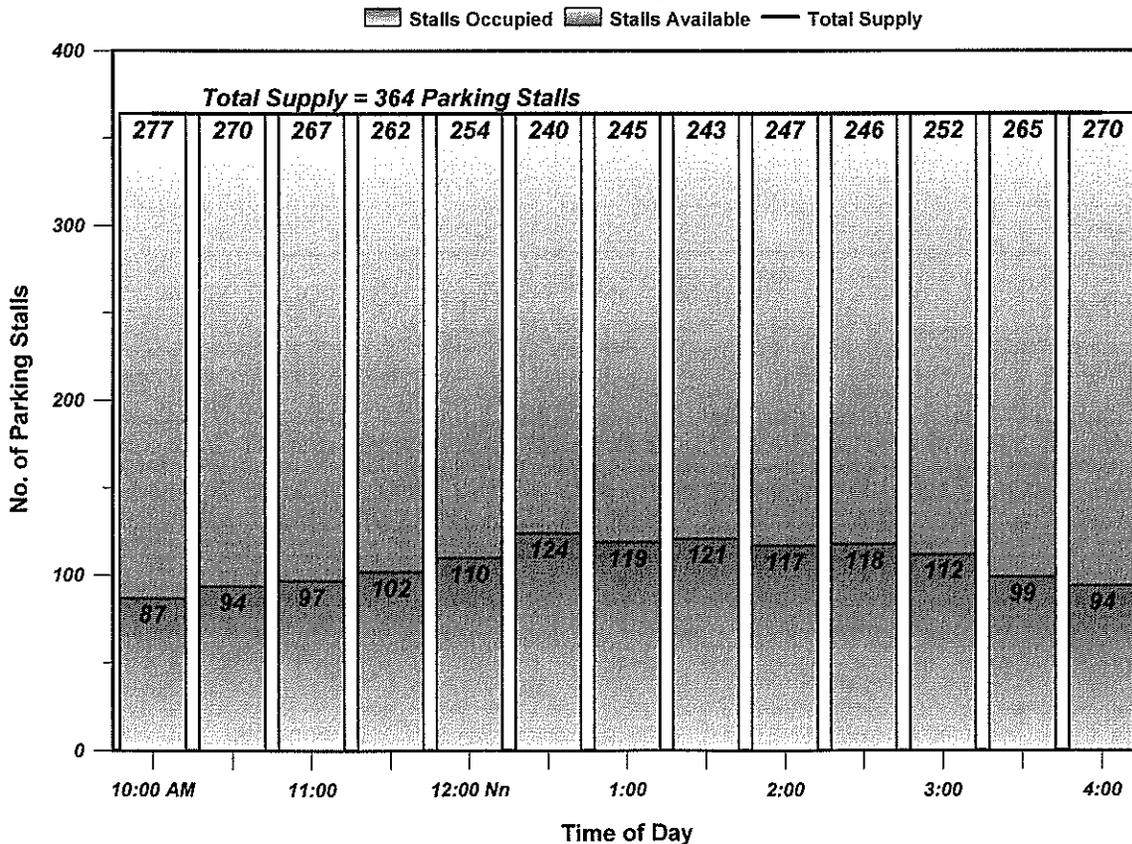


TABLE 5

TOTAL FUTURE PARKING FACILITY THURSDAY ACCUMULATION - SUMMARY
332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

LOCATION	9510 Brighton Way	440 N. Camden Drive	Total Future Parking Occupancy				
SUPPLY	248	364	Stalls	612	Stalls		
TIME START	Stalls Occupied		Site In-Lieu (1)	Stalls Occupied	% of Total	Stalls Avlbl	% of Total
10:00 AM	116	144	20	280	46%	332	54%
30	129	160	20	309	50%	303	50%
11:00	147	163	20	330	54%	282	46%
30	175	165	20	360	59%	252	41%
12:00 Nn	191	169	20	380	62%	232	38%
30	205	176	20	401	66%	211	34%
1:00	216	186	20	422	69%	190	31%
30	206	187	20	413	67%	199	33%
2:00	200	175	20	395	65%	217	35%
30	192	167	20	379	62%	233	38%
3:00	182	173	20	375	61%	237	39%
30	182	155	20	357	58%	255	42%
4:00	170	160	20	350	57%	262	43%
PEAK	216	187	20	422	69%	332	54%

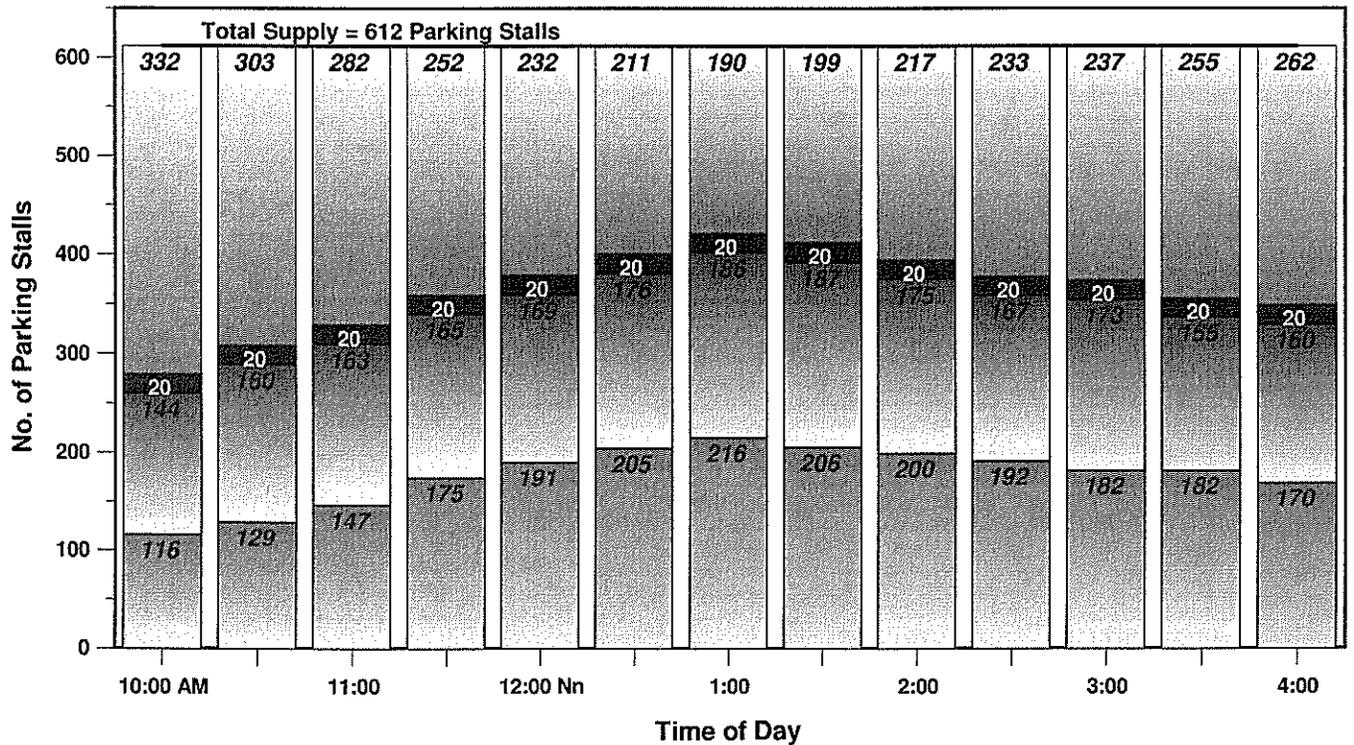
Note: The asterisk (*) indicates the occurrence of a parking peak.

1) Site In-Lieu parking needs per calculations reported in Table 2.

Future Parking Structure Accumulation - Thursday Survey

332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

9510 Brighton Way 440 N Camden Dr. In-Lieu Parking Stalls Available Total Supply



Similarly, Table 6 is a summary of the Saturday parking occupancies for the subject facilities, with the proposed project's 20 stalls in-lieu parking requirement. As indicated in Table 6, the public parking facilities surveyed will have a peak occupancy of 339 parking stalls, or about 55 percent of capacity, expected to occur around 2:30 PM. At that time the balance of 273 stalls or about 45 percent of capacity still will be available. A graphic rendering of the table is shown in the graph following Table 6.

The results of the parking surveys reported above show that the proposed project's parking shortage of 20 stalls can readily be addressed by the parking supply available at the 9510 Brighton Way, and 440 North Camden Drive public parking facilities surveyed. These were found to have sufficient parking available even during peak parking periods. No significant parking impacts are expected as a result of the development of the proposed 332 North Rodeo Drive Commercial Building. Consequently, it is recommended that the project's "in-lieu" parking application be approved.

* * * * *

SUMMARY AND CONCLUSIONS

A 4,435 net square foot expansion of an existing commercial building has been proposed for development on a 7,625 square foot lot, located at 332 North Rodeo Drive, in the City of Beverly Hills, California. The site currently is occupied by a 3½ story commercial building with a gross floor area of about 7,800 sf of gross floor area. The site currently is supported by a surface parking area, located behind the building, providing 14 substandard parking stalls. Access to the parking area is provided by a one-way (southbound) alley, located east of the site, with a standard 20 foot width.

A preliminary analysis was conducted to evaluate the traffic impacts associated with the proposed development. It was found that the proposed project will have a negligible impact upon the surrounding area street system. From a traffic standpoint, it is expected that traffic operations on Rodeo Drive and vicinity streets will not be adversely effected by the minor increase in traffic volumes generated by the proposed commercial building. No mitigation measures have been deemed necessary therefore, none was proposed.

Based upon the City of Beverly Hills' Parking Code, the parking analysis showed that the future development will require a total of 27 parking stalls. That is a shortage of 20 parking stalls, since only seven of the existing 14 stall will remain in the back of the



TABLE 6

TOTAL FUTURE PARKING FACILITY SATURDAY ACCUMULATION - SUMMARY
332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

LOCATION	9510 Brighton Way	440 N. Camden Drive	Total Future Parking Occupancy				
SUPPLY	248	364	Stalls	612	Stalls		
TIME START	Stalls Occupied		Site In-Lieu (1)	Stalls Occupied	% of Total	Stalls Avlbl	% of Total
10:00 AM	116	87	20	223	36%	389	64%
30	131	94	20	245	40%	367	60%
11:00	148	97	20	265	43%	347	57%
30	166	102	20	288	47%	324	53%
12:00 Nn	183	110	20	313	51%	299	49%
30	179	124	20	323	53%	289	47%
1:00	179	119	20	318	52%	294	48%
30	186	121	20	327	53%	285	47%
2:00	192	117	20	329	54%	283	46%
30	201	118	20	339	55%	273	45%
3:00	205	112	20	337	55%	275	45%
30	189	99	20	308	50%	304	50%
4:00	181	94	20	295	48%	317	52%
PEAK	205	124	20	339	55%	389	64%

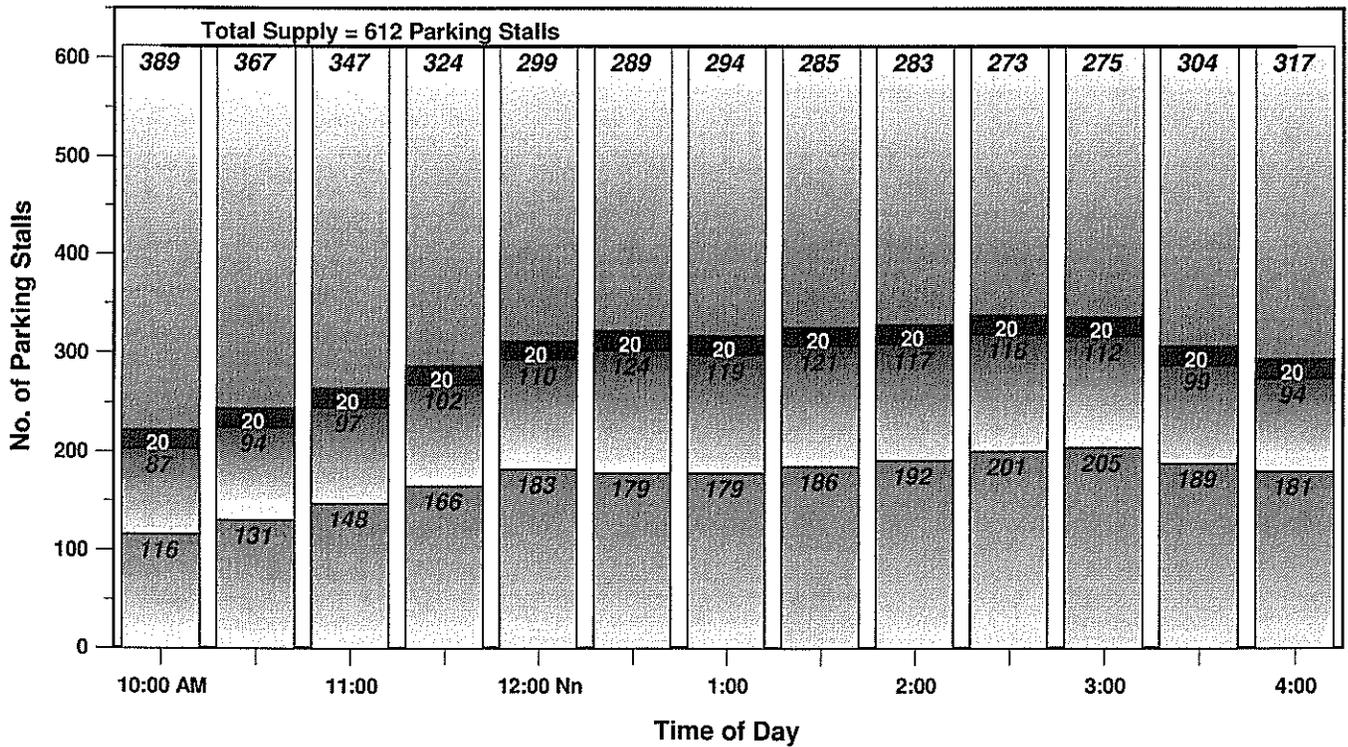
Note: The asterisk (*) indicates the occurrence of a parking peak.

1) Site In-Lieu parking needs per calculations reported in Table 2.

Future Parking Structure Accumulation - Saturday Survey

332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

9510 Brighton Way 440 N Camden Dr. In-Lieu Parking Stalls Available Total Supply



332 North Rodeo Drive Commercial Building In-Lieu Parking Study - Beverly Hills

building, after the development of the proposed expansion. Parking accumulation surveys were conducted at two City owned parking structures located within walking distance from the subject site. The surveys were conducted in order to verify the adequacy of the parking structure to accommodate the proposed project's parking needs, and thus allow the project to participate into the City of Beverly Hills' in-lieu parking program.

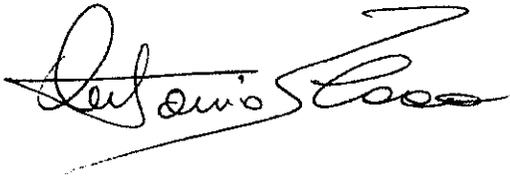
It was found that the proposed 332 North Rodeo Drive commercial building expansion project will have a negligible impact upon area public parking supply. The results of the parking surveys conducted show that adequate parking exists within the study area for the proposed development. The project's code requirement of 20 additional parking stalls can be readily accommodated within the surveyed public structures, without creating undue burden upon available public parking. Consequently, it was recommended that the project's "in-lieu" parking application be approved.

* * * * *

Please call me if you have any questions with regard to our study. It has been a pleasure to serve you on this most interesting project.

Very truly yours,

COCO TRAFFIC PLANNERS, INC.



Dr. Antonio S. Coco, P.E.
President

ASC/mp
#2K8040PK3



Attachment 3
Historic Impact Report
Chattel Architecture



Chattel Architecture
Planning & Preservation, Inc.

1000
Beverly Hills
California
90210

Chattel Architecture Planning & Preservation, Inc.

December 18, 2007

Ms. Michelle McGrath
City of Beverly Hills
455 N Rexford Dr
Beverly Hills, CA 90210-4817

Re: Anderton Court Shops
332 N. Rodeo Drive, Beverly Hills, California

Dear Ms. McGrath:

We have been asked to evaluate impacts of the proposed project involving the above-referenced property under applicable statutes and regulations of the California Environmental Quality Act (CEQA). Originally designed as mixed use commercial/residential building and constructed in 1953, Anderton Court Shops ("subject property") is currently used as a commercial retail building. The proposed project involves minor alteration of the historic building and construction of a new building to the east along a north-south alley shown in plans prepared by Milan Lojdl, Architect AIA. In addition to reviewing the proposed plans, Chattel Architecture reviewed original drawings by Frank Lloyd Wright, Anderton Court Shops National Register of Historic Places registration form and historic photographs.

Anderton Court Shops was listed in the National Register of Historic Places (National Register) on May 14, 2004 and is significant under criterion C in the area of Architecture, as a distinctive work of preeminent American architect and master designer Frank Lloyd Wright. As a property listed in the National Register, Anderton Court Shops is considered an historical resource for the purposes of CEQA.

As an historical resource has been identified, the proposed project is reviewed for conformance with the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring and Reconstructing Historic Buildings (Secretary's Standards).¹ The principal standard for this project is rehabilitation. CEQA utilizes California Register criteria for identifying historical resources eligibility under statutes §21084.1 and provides that the effects of projects found to be "consistent with" the Secretary's Standards "shall generally be considered mitigated below a level of significance and thus is not significant" under CEQA regulations §15126.4(b)(1) (emphasis added).

The following evaluation establishes the regulatory setting, including a summary of the historical resource eligibility, followed by a review of proposed project for conformance with the Secretary's Standards and an assessment of anticipated project impacts.

¹ Kay D. Weeks and Anne E. Grimmer (Washington, D.C.: National Park Service, 1995).

HISTORICAL RESOURCES EVALUATION

As noted above, the subject property is listed National Register and thus is listed in the California Register of Historical Resources (California Register) under Public Resources Code (PRC) §5024.1 (d)(1).

Regulatory Setting

Beverly Hills Municipal Code

City of Beverly Hills has an existing regulation in the municipal code which establishes the duties of the Architectural Commission as an advisory commission to the City Council regarding the preservation of historical and cultural landmarks. The City has established a list of historic and cultural landmarks, but no landmarks have been designated in the list.

Article 32. Preservation of Landmarks states:

The Architectural Commission shall serve in an advisory capacity to the council on the preservation of historic and cultural landmarks in the city. In its capacity as an advisory commission, the Architectural Commission has the following powers and duties:

- (a) to inspect and investigate any site, building, or structure within the city which it has reason to believe is or in the near future will be a historical or cultural landmark;
- (b) to compile and maintain a current list of all such sites, buildings, or structures which it has determined from such inspections and investigations to be historical or cultural landmarks. Such list shall contain a brief description of the site, building, or structure and the reasons for its inclusion in the list; and
- (c) to publish and transmit such a list to all interested parties and disseminate any public information concerning the list or any site, building, or structure contained therein.²

California Environmental Quality Act (CEQA)

According to CEQA,

an historical resource is a resource listed in, or determined eligible for listing in, the California Register of Historical Resources. Historical resources included in a local register of historical resources..., or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, are presumed to be historically or culturally significant for purposes of this section, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant (California Public Resources Code, PRC §21084.1).

If the proposed project were expected to cause substantial adverse change in an historical resource, environmental clearance for the project would require mitigation measures to reduce impacts. "Substantial adverse change in the significance of an historical resource means the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired" (PRC§15064.5 (b)(1)). PRC §15064.5 (b)(2) describes material impairment taking place when a project:

² <http://66.113.195.234/CA/Beverly%20Hills/index.htm>

- (A) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register... or
- (B) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register... or its identification in an historical resources survey... unless the public agency reviewing the effects of the project establishes by a preponderance of evidence that the resource is not historically or culturally significant; or
- (C) Demolishes or materially alters those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register... as determined by a lead agency for the purposes of CEQA.

California Register of Historical Resources (California Register)

The California Register was established to serve as an authoritative guide to the state's significant historical and archaeological resources (PRC §5024.1). State law provides that in order for a property to be considered eligible for listing in the California Register, it must be found by the State Historical Resources Commission to be significant under any of the following four criteria; if the resource:

- 1) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
- 2) Is associated with the lives of persons important in our past.
- 3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual or possesses high artistic values.
- 4) Has yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting one of the four above criteria, California Register-eligible properties must also retain sufficient integrity to convey historic significance. California Register regulations contained in Title 14, Chapter 11.5, §4852 (c), provide that "it is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register." The California Office of Historic Preservation (OHP) has consistently interpreted this to mean that a property eligible for listing in the California Register must retain "substantial" integrity.

The California Register also includes properties which: have been formally determined eligible for listing in, or are listed in the National Register of Historic Places (National Register); are registered State Historical Landmark Number 770, and all consecutively numbered landmarks above Number 770; points of historical interest, which have been reviewed and recommended to the State Historical Resources Commission for listing; and city and county-designated landmarks or districts (if criteria for designation are determined by OHP to be consistent with California Register criteria). PRC §5024.1 states:

- (g) A resource identified as significant in an historical resource survey may be listed in the California Register if the survey meets all of the following criteria:
 - (1) The survey has been or will be included in the State Historical Resources Inventory.

- (2) The survey and the survey documentation were prepared in accordance with [OHP]... procedures and requirements.
- (3) The resource is evaluated and determined by the office to have a significance rating of category 1-5 on DPR [Department of Parks and Recreation] form 523.
- (4) If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources which have become eligible or ineligible due to changed circumstances or further documentation and those which have been demolished or altered in a manner that substantially diminishes the significance of the resource.

National Register of Historic Places (National Register)

The National Register is the nation's official list of cultural resources worthy of preservation. Authorized under the National Historic Preservation Act of 1966, as amended, the National Register is part of a national program to coordinate and support public and private efforts to identify, evaluate, and protect the country's historic and archaeological resources. Properties listed in the National Register include districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture. The National Register is administered by the National Park Service (NPS). Currently there are more than 75,000 listings that make up the National Register, including all historic areas in the National Park System, over 2,300 National Historic Landmarks, and properties which have been listed because they are significant to the nation, a state or a community.³

As stated in 36 Code of Federal Regulations (CFR) §60.4, in order to be considered for listing in the National Register, a resource must meet the criteria for evaluation:

The quality of significance in American history, architecture, archaeology, engineering and culture is present in districts, sites, buildings, structures and objects that possess integrity of location, design, setting, materials, workmanship, feeling and association, and:

- (a) that are associated with events that have made a significant contribution to the broad patterns of our history; or
- (b) that are associated with the lives of persons significant in our past; or
- (c) that embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- (d) that have yielded, or may be likely to yield, information important in prehistory or history.

The National Register includes only those properties that retain sufficient integrity to accurately convey their physical and visual appearance during their identified period of significance. Integrity is defined in the National Register program as a property's ability to convey its significance. Evaluation of integrity may be a somewhat subjective judgment, however it must be founded on "an understanding of a property's physical features and how they relate to its

³ <<http://www.cr.nps.gov/places.htm>>

significance.”⁴ While integrity is important in evaluating and determining significance, a property’s physical condition, whether it is in a deteriorated or pristine state, has relatively little influence on its significance. A property that is in good condition may lack the requisite level of integrity to convey its significance due to alterations or other factors. Likewise, a property in extremely poor condition may still retain substantial integrity from its period of significance and clearly convey its significance.

Building Description

Anderton Court shops, located at 332 N. Rodeo Drive in Beverly Hills, is a three story plus penthouse concrete commercial-retail building designed-by-Frank Lloyd Wright. The National Register of Historic Places registration form prepared by the Los Angeles Conservancy further describes the building as:

“an inverted “V” façade that expands the street into the court, enabling greater street exposure on an expensive site and providing each shop with window frontage. The decorative program used throughout the building includes downward tapering piers, fascia and soffit detailing all echoing the chevron pattern created in the central spire, roofline and angled ramps. The complex consists of six small shops; three on either side, each staggered a half-floor from one another and offset by an angular ramp leading up and around a hexagonal light well. A penthouse unit sits atop the northeastern portion of the structure. Rising above the central light well is the building’s most defining element: a spire fitted with interior lights that project their illumination through the louvers.

The complex is constructed of reinforced concrete finished with plaster. The building’s concrete foundation supports walls of *gunite*, a concrete mixture sprayed over steel reinforced forms. The floor slabs, however, were poured in place in the conventional manner.

The rear of the building faces east, follows the hexagonal shape of the building’s footprint. Facing an alley with a parking lot extending from the complex, the façade is made up of banks of steel sash awning windows on each floor, four on the north and three on the south, and a central entrance at ground level with paired glass doors. Above the entry is a projecting canopy with chevron-patterned fascia. Electrical and mechanical wiring and conduit boxes create a maze on the building’s exterior...”

Sited to the west on a mid-block parcel, the three story reinforced concrete building has a fourth floor penthouse and partial basement. The building is organized around a central exterior court with a continuous ramp as the primary means of vertical circulation, similar to that of the Guggenheim Museum in New York. As is common in the work of Wright, the building is based on a typical unit consisting of a parallelogram with equal sides of approximately nine feet in length set at 60 or 120 degrees, roughly forming a diamond shape. In some instances, consistent with the above-description, this takes the form of a hexagon or triangle. Original construction documents consist of small scale floor plans, elevations, sections and large scale details. Much of what appears to have been designed by Wright remains today, including the raked piers which flank the inverted V-shaped facade to the north and south, relatively solid

⁴ National Park Service, Department of the Interior *How to Apply the National Register Criteria for Evaluation* (Washington, DC 1998) 44.

guardrails on the ramp, large expanses of raked glass storefront, grouped to cover two levels on the south and a central metal spire.

Alterations

Alterations on the west elevation or façade include new storefront doors and in some cases storefront infill, added tenant signage, guardrails at the south lower level and north upper level, removal of the finial or mast atop the spire and addition of pierced metal panel equipment screening at the leading edge of the roof at the south. Original lighting may not be fully operational as intended. Circular windows on the second floor hallway have been over-painted.

Historic Context and Subject Property History

The first step in evaluating the subject property is to place it within its context. The following section provides a brief historical overview of the development of Beverly Hills. This history of the City of Beverly Hills has been abstracted from the City's 1985-1986 Historic Resources Survey.⁵

Historic Context

From the time of its settlement by Mexican pioneers in 1822, until the World War I era, the Beverly Hills area was a primarily agricultural region. Cattle ranches predominated during the Mexican era, giving way to sheep ranches in the 1860s, and then lima bean fields beginning in the 1880s. During this early period, several attempts were made to establish a town in what is now Beverly Hills, including the proposed developments of Santa Maria in 1869 and Morocco in 1888. Efforts to create the present community of Beverly Hills finally succeeded in 1907. As one of the earliest planned communities in southern California, the city was designed with smaller lots at its southern edge to large estates for the wealthy in the foothills at the north. The elite northern portion was divided from the southern portion by the railroad tracks and commercial triangle between S Santa Monica and Wilshire boulevards.

Beverly Hills in 1920 was a city in transition. The majority of its residential and commercial lots were still vacant, but enough development had occurred to make it clear that a town was being formed. By the end of the decade, the city was largely developed and had assumed the basic form it retains today.

Commercial development in the "downtown triangle," bounded by S Santa Monica Boulevard and the railroad tracks on the north, Rexford Drive on the east and Wilshire Boulevard on the southwest, and apartments in the area south of Wilshire and S Santa Monica boulevards completed the transformation of the City from a semi-rural outpost into a synonym for urbanity.

Both phases of the Moderne, the Zigzag mode of the 1920s and the Streamlined Moderne of the 1930s were often used on commercial buildings for their stylistic up-to-date connotations. By the end of the 1920s, downtown Beverly Hills had several movie houses, two major hotels, and a "trade at home week" which "set out to prove that the finest shops and stores on the West Coast were in the city." Downtown development flourished, responding to a population, which had risen from less than 700 people in 1920 to 12,000 in 1926.

The turn of the 20th century brought the arrival of the Los Angeles' first automobile as well as Henry E. Huntington's Pacific Electric Railway Company which would link Los Angeles communities by a network of railcars. Two rail lines converged at the Beverly Hills Pacific

⁵ Beverly Hills Historic Resources Survey, 1985-1986 4-20.

The discussion is an edited version of the material contained on pages 4-20, with minor modifications.

Electric station located at the corner of S Santa Monica Boulevard and Canon Drive, one from the east which extended down the center of S Santa Monica Boulevard from the Sherman station and the other from the south.⁶ These rails lines served both passenger and freight traffic. Between 1935 and 1937, Beverly Hills had the heaviest freight traffic on this line, producing 1,130 car loads annually.⁷ Passenger service was discontinued in 1940⁸ while freight service continued until 1972.⁹

While Beverly Hills was fully developed by the end of World War II, it continued to grow in intensity of land use and population by the subdivision of large estates such as Trousdale Estates out of the old Doheny ranch in 1955, and the demolition of existing structures for new apartments, stores, and offices.

During the 1950s, Beverly Hills gained an additional identity as a workplace. It became a daytime home to office workers, as well as a nighttime home to movie stars. The 1920s was the last decade in which downtown Los Angeles was preeminent as an office, financial, and professional center. From this point on, offices dispersed to several outlying nodes of activity, such as Beverly Hills, Westwood, and the San Fernando Valley.

During the 1960s and 1970s, Beverly Hills downtown urbanization continued until the westernmost section of the downtown triangle was as densely developed as any Southern California office cluster outside of downtown Los Angeles.

New construction in Beverly Hills is scattered throughout the City, on undeveloped properties in the hills and on redeveloped parcels in the residential and commercial sections of the "flats."

Subject Property History

The following section provides a brief historical overview of the Anderton Court Shops. This history has been abstracted from the National Register Nomination form (attachment 1).

Methodology

The subject property history was compiled through review of Frank Lloyd Wright's drawings, which include fifteen sheets of original signed plans for the Anderton Court Shops detailing front and rear elevations, sections, perspective drawing (Figure 9) floor plans (with furniture placement in the penthouse), and decorative elements such as the chevron patterned fascia and illumination of soffit. Additional information was provided by the National Register Nomination form, a thoroughly researched and well written history of the subject property with additional historic photographs (attachment 1) and historical building permits.

In 1951 Nina G. Anderton commissioned Frank Lloyd Wright to design a complex of small retail shops in the heart of the Beverly Hills Commercial district. Nina Anderton a wealthy socialite and Bel-Aire resident, constructed the subject property for her friend and couturier Eric Bass who was to manage the complex, have a shop for his clothing and reside on the top floor. The shops were completed in March 1954, but required three revisions to the drawings to accommodate Nina Anderton's wishes and concern that the project was going to be too costly. Modifications in the design of Anderton Court Shops due to budget constraints consist of

⁶ The Electric Railway Historical Association of Southern California
<http://www.erha.org/lap_corphist.htm#lacrc>, accessed on June 12, 2006.

⁷ The Electric Railway Historical Association of Southern California.

⁸ The Electric Railway Historical Association of Southern California.

⁹ "SP Freight Train Nears End of Line," *Los Angeles Times*, January 3, 1972, B7.

constructing the fascia, soffit, spire and piers out of fiberglass reinforced plastic instead of copper as intended. During construction Anderton and Bass had a falling out, leaving the building without management or tenants. As a result, the project would cost almost double the original estimate.

Frank Lloyd Wright

Experimenting with forms and materials, Frank Lloyd Wright developed a distinctly American form of architecture. Wright began his career in Oak Park, Illinois, and came to be recognized as one of the greatest architects of the twentieth century.

Wright designed only eight buildings in the Los Angeles area. The Anderton Court Shops is significant because it is the only non-residential building Wright designed in Southern California. Up to the time the subject property was designed in the early 1950s, most of Wright's work was residential commissions. By 1957 the majority of Wright's work consisted of commercial, civic, cultural, religious, educational or governmental structures. Only three commercial buildings designed by Wright are extant: the Anderton Court Shops, the V.C. Morris Gift Shop in San Francisco (1948), and the Hoffman Auto Showroom in Manhattan (1954).

ANALYSIS OF PROPOSED PROJECT IMPACTS

According to CEQA Guidelines §15064.5(b)(3):

Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Secretary's Standards), shall be considered as mitigated to a level of less than a significant impact on the historical resource.

Thus, the CEQA Guidelines indicate that effects on historic resources resulting from a project that is found to be in conformance with Secretary's Standards are generally considered to be mitigated to a less than significant level or exempt.

Secretary of the Interior's Standards for Treatment of Historic Properties

The proposed project is evaluated for conformance with the Secretary's Standards, the applicable standard being rehabilitation. The Secretary's Standards recommend rehabilitation as a treatment, "when repair and replacement of deteriorated features are necessary; when alterations or additions to the property are planned for a new or continued use; and when its depiction at a particular period of time is not appropriate, rehabilitation may be considered as a treatment." The rehabilitation standards are:

Standards for Rehabilitation

1. A property will be used as it was historically or be given a new use that requires minimal change to its distinctive materials, features, spaces, and spatial relationships.
2. The historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces, and spatial relationships that characterize a property will be avoided.
3. Each property will be recognized as a physical record of its time, place, and use. Changes that create a false sense of historical development, such as adding conjectural

features or elements from other historic properties, will not be undertaken.

4. Changes to a property that have acquired historic significance in their own right will be retained and preserved.
5. Distinctive materials, features, finishes, and construction techniques or examples of craftsmanship that characterize a property will be preserved.
6. Deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement of a distinctive feature, the new feature will match the old in design, color, texture, and, where possible, materials. Replacement of missing features will be substantiated by documentary and physical evidence.
7. Chemical or physical treatments, if appropriate, will be undertaken using the gentlest means possible. Treatments that cause damage to historic materials will not be used.
8. Archeological resources will be protected and preserved in place. If such resources must be disturbed, mitigation measures will be undertaken.
9. New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment.
10. New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired.

The Secretary's Standards are not intended to be prescriptive, but instead provide general guidance. They are intended to be flexible and adaptable to specific project conditions, including aspects of adaptive use, functionality and accessibility. The goal is to balance continuity and change and retain historic building fabric to the maximum extent feasible. The National Park Service has compiled some bulletins to provide guidance on specific topics, however there is not an abundance of information on interpreting the Secretary's Standards. The Secretary's Standards are interpreted most consistently in application of the Investment Tax Credit (ITC) program for certified historic preservation projects. Additional guidance can be found in the regulations implementing the ITC program at 36 Code of Federal Regulations (CFR) Part 67.

While circumstances of every project are different, the Secretary's Standards are interpreted consistently by state and federal reviewers. The Secretary's Standards anticipate change, therefore such interpretation will necessarily require exercise of professional judgment and an ability to balance various opportunities and constraints of any given project based on use, materials retention and treatment, and compatibility of new construction.

Proposed Project

The proposed project involves construction of a new three-story commercial building at the rear of the parcel to infill the roughly rectangular space now used for surface parking. No rehabilitation work is proposed for the historical resource, 332 N. Rodeo Drive. The proposed project is shown in plans prepared by Milan Lojdl, Architect AIA and transmitted to Chattel

Architecture in August 2007. The following description analyzes the proposed work for potential direct impacts on 332 N. Rodeo Drive, an historical resource under CEQA, followed by an analysis of potential indirect impacts of the proposed construction on the historical resource and its immediate surroundings. This review is limited to the work described herein. Written description in this letter takes precedence over concept layouts and gives direction to design development.

Potential Impacts to Historical Resource and Setting

Potential impacts to the historical resource and its setting should be evaluated in the context of the *Secretary's Standards* and CEQA. Standard 9 states that "New additions...or related new construction will not destroy...spatial relationships that characterize the property. The new work will be differentiated from the old and will be compatible with the historic materials, features, size, scale and proportion, and massing to protect the integrity of the property and its environment." Standard 10 asserts "New additions and adjacent or related new construction will be undertaken in such a manner that, if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired." In addition, CEQA defines substantial adverse change to an historical resource as "the physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired."

The proposed new construction consists of a three-story building, with parking on the first floor and commercial space on the two upper floors. Rectangular at the east to the limits of the site allowed by zoning regulations and "V" shaped at the west, the footprint of new building will completely occupy the parcel, leaving triangular shaped areas on either side of the "V" open to the sky above. A rectangular elevator tower will project into the south open area. The new building will connect to the historical resource at its westernmost tip.

The east elevation consists of a large rectangular opening on the first floor for access to ground level parking. A strip of windows occupy the second and third floors on the east elevation along the alley.

The footprint of the proposed new building attempts to mirror the rear of the historical resource, particularly with its triangular shaped open areas. The proposed project will neither be based on the typical unit, a parallelogram, nor be constructed of reinforced concrete as was the original building. As a result, the new building will neither mimic nor copy the historic building exactly. The steel frame structure will allow for the floor plates to span the parking area with minimal intrusion into the parking level. The exterior cladding is proposed to be cement plaster or stucco with a smooth troweled finish to resemble the historic building.

As the plans only represent a very early concept design or cartoon, it is particularly difficult to fully evaluate impacts of the proposed project on the historic building. As new construction is concentrated at the rear of the parcel facing the alley, does not extend higher than the historic penthouse structure and will only minimally connect to the historic building it appears to meet Secretary's Standards 9 and 10.

In accordance with Secretary's Standard 9, concentrating the new construction at the rear does not destroy spatial relationships that characterize the historic building. As the new building will not exceed the height of the historic building and will extend the limits of the site similar to the historic building, it appears to be compatible with the size and scale of the historic building. The new construction will be differentiated from the old and use of a smooth troweled finish is

compatible with historic materials. As required by Secretary's Standard 10, the minimal connection to historic building does not appear to impair the essential form and integrity of the historic building should the new construction be removed in the future.

As proposed, the project does not include any upgrades to circulation, fire-life safety, mechanical, electrical or plumbing to the historic building. It appears appropriate, for the long term financial stability of the property as a whole, to add new construction and hence greater leaseable commercial retail area. Nevertheless, the trades-off necessary to balance continuity and change at this property should, at a minimum, include the following recommended treatments for Architectural Commission review and approval to ensure the viability of the commercial retail space in the historic building. The following recommendations will also have a long term beneficial impact on the historic building as a whole:

Include in new construction as an essential or priority part of the proposed project program

1. Design and install the new elevator at the infill building to provide for access to and from Rodeo Drive on the west elevation or façade. The elevator may be located immediately adjacent to the east elevation of the historic building, limited openings in the historic building may be added to allow for elevator access at each floor elevation, but avoid any openings into the character-defining hexagonal-shaped stair in the historic building.
2. Implement access points to the new elevator either directly in retail lease space or as tenancies change, develop a narrow corridor system within the south retail lease spaces at each level to provide direct elevator access. It is anticipated that the elevator may have as many as six stops, three in the historic building and three in the new building, including the ground level parking.
3. Do not use the existing stair in the historic building as the second means of egress from the new building. This will avoid code-required upgrades of the stair and allow for its continued use under provisions of the California Historical Building Code.
4. Over time, remove all surface mounted mechanical, electrical and plumbing equipment from the east elevation of the historic building. Incorporate a chase in the new elevator tower to accept new mechanical, electrical and plumbing equipment as the historic building is upgraded in the future.
5. Restore existing steel sash windows in the east elevation. Ensure all windows are in good operating condition, working as intended historically.
6. Develop and implement a property-wide signage program and policy to be incorporated in tenant leases. The new signage program and policy would address existing signage as tenants change and allow for appropriate, compatible tenant signage for the new infill building.

To further reduce impacts of new construction on the historic building implement the following mitigation measures:

1. Prepare photo documentation of the east elevation and character-defining stair of the historic building using large format archival quality processes. At least five photographs of four by five inch negatives and eight by ten inch prints shall be prepared and submitted to the Beverly Hills Public Library after acceptance by the Planning Department.
2. Restore the central spire to its original appearance including electrical lighting, finishes and finial or mast. Restore fascia and soffit to original appearance including electrical lighting and finishes.
3. Remove existing pierced metal false parapet screening mechanical equipment. Either relocate this existing element east as far as possible, following the shape of the roof

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footprint, paint it a darker color, or redesign it entirely to allow the leading edge of the south roof area to read as a thin horizontal member as intended.

4. Redesign and replace guardrails at the south lower and grade levels and north third floor levels to not detract from the historic character of the property. All glass or thin wire cable systems may be appropriate.
5. All future interior remodel or alteration of the historic and new buildings is recommended for review by the Architectural Commission.

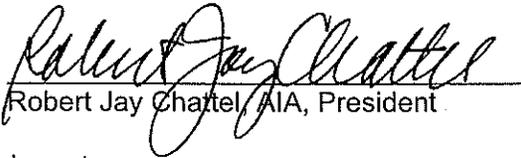
CONCLUSION

The proposed project involves minor alteration and new infill construction at the rear of the subject property. The subject property is listed in the National Register, is thus listed in the California Register, and is an historical resource under CEQA. Proposed project impacts were analyzed for conformance with the Secretary's Standards and local design guidelines. Work proposed in concept layouts conforms to the Secretary's Standards, and therefore would have a less than significant impact with implementation of required mitigation under CEQA. Implementation of recommended treatments and mitigation measures described above will have a long term beneficial impact on the historic building.

Please call me at (818) 788-7954, if you have any questions.

Very truly yours,

CHATEL ARCHITECTURE, PLANNING & PRESERVATION, INC.

By: 
Robert Jay Chatel, AIA, President

attachments

cc: Milan Lojdl, AIA