



Westside Purple Line Rodeo Station North Portal

Draft Environmental Impact Report

August 2020



**Draft Environmental Impact Report
Westside Purple Line Wilshire/
Rodeo Station North Portal Project**
State Clearinghouse No.: 2019090104

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EXECUTIVE SUMMARY

Introduction and Background

This document is an Environmental Impact Report (EIR) prepared by the City of Beverly Hills (City) to evaluate potential environmental effects of the proposed Westside Purple Line Wilshire/Rodeo Station North Portal Project. This section summarizes the characteristics of the Project, the Project Alternatives, and the associated environmental impacts and mitigation measures.

This EIR has been prepared in conformance with the California Environmental Quality Act of 1970 (CEQA) statutes (California Public Resources Code Section 2100 et. seq., as amended) and its implementing guidelines (California Code of Regulations, Title 14, Section 15000). The City is identified as the lead agency for the Project under CEQA.

For EIR analysis purposes, the Project (Beverly Drive) consists of a half portal entrance/exit to the Wilshire/Rodeo Station on the west side of Beverly Drive, north of Wilshire Boulevard. Two Project Alternatives are being considered for the North Portal: the Cañon Drive-Half Portal Alternative consisting of a half portal on the west side of Cañon Drive north of Wilshire Boulevard; and the Cañon Drive Staging Yard Alternative consisting of a half portal in Metro's existing construction staging yard along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive. The EIR analyzes the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and the Cañon Drive Staging Yard Alternative, collectively referred to as the Project and Project Alternatives, at a similar level of detail.

Purple Line Extension Project Background

The Purple Line Extension will extend the existing Purple Line subway (also known as the Metro D Line) from its current terminus at Wilshire/Western to a proposed new station in Westwood. The Purple Line Extension Project has also formally been referred to as the Westside Subway Extension Project in previous documents.

The Federal Transit Administration (FTA) and Los Angeles County Metropolitan Transportation Authority (Metro) prepared the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Westside Subway Extension Project in 2010 pursuant to the National Environmental Policy Act (NEPA) and CEQA (FTA & Metro, 2010). During the Draft EIS/EIR phase, Metro engaged with the community and relevant stakeholders via a series of Station Information Meetings held between October and November 2009, to solicit input from the public regarding potential station entrance locations at the Wilshire/Rodeo Station. In February 2012, a Station Entrance Location Report and Recommendations was prepared by Metro to support the Westside Subway Extension Project Final EIS/EIR, to identify preferred station locations and entrance alternatives for the subway project, as well as to provide a rationale for screening options down to a single entrance for inclusion within the Final EIS/EIR (Metro, 2012).

Upon the completion of the screening, a single entrance for the Wilshire/Rodeo Station was recommended for inclusion in the Final EIS/EIR (Metro, 2012). The three station entrance alternatives considered in the Station Entrance Location Report and Recommendations document included: The Union Bank Building site at Wilshire Boulevard and El Camino Drive; the Ace Gallery site at the southwest corner of Wilshire Boulevard and Reeves Drive; and the

Bank of America site at the northwest corner of Wilshire Boulevard and Beverly Drive (Metro, 2012). The Ace Gallery site was selected by Metro as the preferred primary station entrance for the Wilshire/Rodeo Station. This site had been previously identified for demolition, with the land to be used as a construction and staging site for the Purple Line Extension project. Following construction of the subway, the repurposing of this residual land for a station entrance portal was found to reduce the need for any additional property acquisitions or demolition of existing occupied buildings at this site. Metro also determined that this location would result in fewer impacts to any potentially historic buildings, businesses, parking, and traffic, and would be consistent with the public preferred option (Metro, 2012).

Following the selection of a preferred station entrance location, Metro recommended that future consideration to provide secondary station access on the north side of Wilshire Boulevard should be undertaken. This would provide passenger connectivity to Rodeo Drive and the Business Triangle, as well as address additional public suggestions. It was concluded that knock-out panels would be provided near the southwest and northwest corners of the Wilshire Boulevard and Beverly Drive intersection to support this recommendation (Metro, 2012).

Section 1 of the Purple Line Extension project is currently under construction and is expected to begin operations in 2023. Section 1 includes three new stations (Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega). The Metro Board of Directors approved Sections 2 and 3 of the Purple Line Extension Project in May 2012. Section 2 of the Purple Line Extension project is also currently under construction and is expected to begin operations in 2025. Section 2 includes two new stations at Wilshire/Rodeo and Century City/Constellation. Section 3 of the Purple Line Extension Project is currently in pre-construction and is anticipated to open for operations in 2026. Section 3 includes two new stations (Wilshire/Westwood and Wilshire/VA Hospital).

In November 2017, the FTA issued a Supplemental EIS and Section 4(f) Evaluation pursuant to NEPA for Section 2 of the Purple Line Extension project, including a Supplemental Record of Decision (FTA & Metro, 2017). The Supplemental EIS stated that the Wilshire/Rodeo Station will be designed with a knockout panel, allowing for the development of a future station entrance on the north side of Wilshire Boulevard.

Wilshire/Rodeo Station North Portal Project Background

In 2018 in response to stakeholder requests, the City approached Metro to provide a North Portal entrance/exit for the Wilshire/Rodeo Station on the north side of Wilshire Boulevard. Through the provision of the North Portal, the City seeks to provide enhanced passenger access to the Beverly Hills Business Triangle and minimize pedestrian crossings on Wilshire Boulevard, which is a prime local and regional destination and a key hub for tourism, shopping, and dining experiences bounded by North Santa Monica Boulevard to the north, Wilshire Boulevard to the south, and Crescent Drive to the east. North of Wilshire Boulevard in the station area is also a major employment center and the City is seeking to support commuting workers in this area through the provision of a more convenient station entrance/exit that will minimize the need for pedestrians to cross Wilshire Boulevard to improve pedestrian access, reduce the risks of automobile/pedestrian conflicts, and avoid traffic congestion.

Three potential station entrance/exit locations have been identified on the north side of Wilshire Boulevard. For EIR analysis purposes, the "Project" (Beverly Drive) consists of a half portal entrance/exit on the west side of Beverly Drive, north of Wilshire Boulevard. Two alternative locations for a half portal are being analyzed as Project Alternatives, one located on the west

side of Cañon Drive north of Wilshire Boulevard, and the second located on the construction staging yard established for the Section 2 project located along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive.

Project Location and Setting

The Project and Project Alternatives are located within the City of Beverly Hills, north of and adjacent to the existing footprint of the Wilshire/Rodeo Station, which is part of Section 2 of the Purple Line Extension project. The Wilshire/Rodeo Station is currently under construction and will be located immediately beneath Wilshire Boulevard, extending from approximately Beverly Drive to the alley (adjacent to Crescent Drive) between Cañon and Crescent Drives (Figure ES-1). Additionally, the station that is under construction will include one entry/exit located on the southwest corner of Wilshire Boulevard and Reeves Drive. Figure ES-1 also shows the locations of the Project, as well as the Project Alternatives, other than the No Project Alternative, being considered, as listed below:

- The Project: A half portal located on the west side of North Beverly Drive, within the existing right-of-way (ROW), north of Wilshire Boulevard.
- Cañon Drive-Half Portal Alternative: Located on the west side of North Cañon Drive, within the existing ROW, north of Wilshire Boulevard.
- Cañon Drive Staging Yard Alternative: Located in the construction staging yard established for construction of the Wilshire/Rodeo Station located along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive.

The Project area is bound by North Beverly Drive to the west, the alley adjacent to North Crescent Drive to the east, Clifton Way to the north and Wilshire Boulevard to the south, which is predominantly flat, with a slight incline gradient when traveling in a northerly direction. Generally, the Project and Project Alternatives sites are located in an area that is characterized as a developed commercial area. Buildings surrounding the sites are typically multi-story and used predominately for business/commercial and/or residential purposes. The area is a prime local and regional shopping destination and key hub for tourists and others to visit the City and experience the shopping and dining located in the Business Triangle north of Wilshire Boulevard. The streets in the Project area are generally landscaped, mostly with potted flowers and greenery, established street trees, and/or palm trees. The northwest corner of the intersection of Wilshire Boulevard and North Beverly Drive contains a public art installation. The area north of Wilshire Boulevard also supports a number of businesses and their employees and is considered a significant employment area within the City.

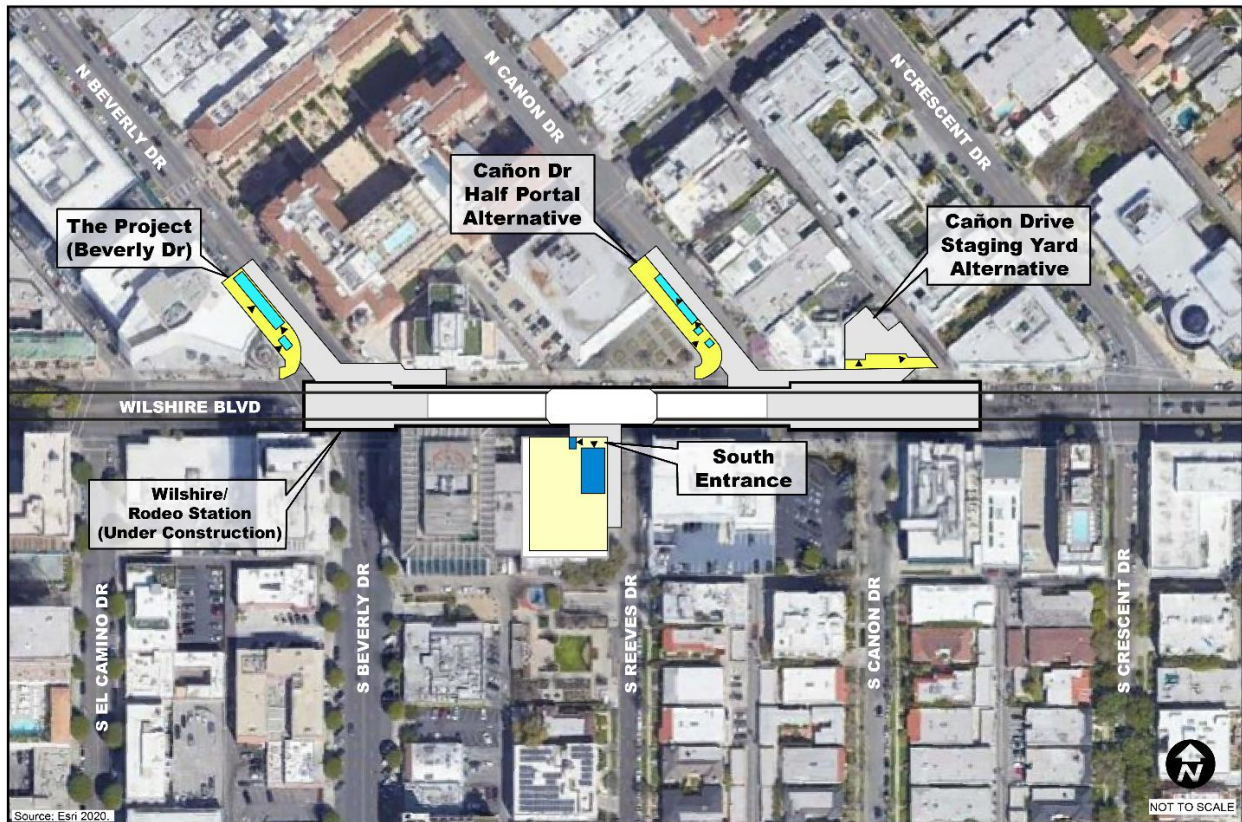


Figure ES-1 Westside Purple Line Wilshire/Rodeo Station North Portal Project and Alternatives

Project Objectives

In accordance with CEQA Guidelines Section 15124, the primary objectives of the Project and Project Alternatives are to:

- Provide direct access from the north side of Wilshire Boulevard to the Wilshire/Rodeo Purple Line Station.
- Provide direct pedestrian access to jobs, retail, and amenities in the City's business triangle
- Improve pedestrian and avoid significant degradation of vehicular flow in the vicinity of the Wilshire/Rodeo Purple Line Stations
- Minimize pedestrian street crossings on Wilshire Boulevard

Project Alternatives

The EIR analyzes the Project (Beverly Drive) and two Project Alternatives: the Cañon Drive-Half Portal Alternative and the Cañon Drive Staging Yard Alternative. These are collectively referred to as the Project and Project Alternatives. In addition, the No Project Alternative is analyzed as required under CEQA.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. In addition, planned municipal projects as shown in Table 2-1 List of Related Projects) in Chapter 2 Project Description, would still be developed in the area. The only means of ingress and egress to the Wilshire/Rodeo Station would be at the currently proposed portal on the south side of Wilshire Boulevard at Reeves Drive.

The Project (Beverly Drive)

The Project would comprise a station portal entrance/exit within the existing ROW on the west side of North Beverly Drive, north of Wilshire Boulevard. The footprint of this alternative would be approximately 9,200 square feet and would extend from its connection to the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 165 feet north along North Beverly Drive.

Three levels would be provided at the new entrance/exit. The street level would comprise the new station portal entrance/exit, including two elevators, one stairway, and one “up” escalator. A covered canopy would also be located above the portal on the street level, which would be enclosed by a translucent glass exterior. The portal would be 12 feet tall on the street level. The adjacent sidewalk would be extended. The Project would impact a total of five existing street trees. Four trees located on the west side of Beverly Drive would require relocation within the site, and one tree would be permanently removed and potentially relocated elsewhere in the area as feasible. Other new landscaping may be provided with the Project. Three on-street parking spaces would be permanently removed along the west side of Beverly Drive, and six on-street parking spaces would be removed along the east side of Beverly Drive. The Project would require removal of the majority of the southbound right-turn pocket on the west side of Beverly Drive, just north of Wilshire Boulevard. The proposed configuration of the Project would consist of one through lane and one shared through-right-turn lane on the southbound Beverly Drive approach. Therefore, two southbound travel lanes would be maintained, as well as two northbound travel lanes.

The intermediate stairway landing level would consist of a landing area serving as a transition between stairways. The walkway or concourse level would consist of an open area with adequate space for passengers to ingress and egress from the stairway, escalator, and elevators. The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates and then to the Wilshire/Rodeo Station walkway previously analyzed in the Purple Line Extension EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed.

Cañon Drive-Half Portal Alternative

The Cañon Drive-Half Portal Alternative would comprise a station portal entrance/exit within the existing ROW on the west side of Cañon Drive, north of Wilshire Boulevard. The footprint of this alternative would be approximately 8,100 square feet and would extend from its connection with the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 195 feet north along North Cañon Drive.

Similar to the Project, the Cañon Drive-Half Portal Alternative would include three levels. The street level would comprise the north portal entrance/exit, including two elevators, one stairway,

and one “up” escalator. A covered canopy would also be located above the portal on the street level, which would be enclosed by a translucent glass exterior. The portal would be 12 feet tall on the street level. The adjacent sidewalk would not be extended with this alternative. Five trees located on the west side of Cañon Drive would be permanently removed, and potentially relocated elsewhere in the area as feasible. Three on-street parking spaces would be permanently removed along the west side of Cañon Drive, and eight on-street parking spaces would be permanently removed along the east side of Cañon Drive. No traffic lanes would require permanent removal. Therefore, the two southbound right-turn and left-turn travel lanes would be maintained, as well as two northbound travel lanes.

The intermediate stairway landing would consist of a landing area serving as a transition between stairways. The walkway or concourse level would consist of an open area with adequate space for passengers to ingress and egress from the stairway, escalator, and elevators. The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates and then to the Wilshire/Rodeo Station walkway previously analyzed in the Purple Line Extension EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed.

Cañon Drive Staging Yard Alternative

The Cañon Drive Staging Yard Alternative would comprise a station portal entrance/exit in the existing Cañon Drive construction staging yard established for the Section 2 Purple Line Extension project and the public sidewalk, on the northeast corner of Cañon Drive and Wilshire Boulevard. The footprint of this alternative would be approximately 3,800 square feet.

Similar to the Project and the Cañon Drive-Half Portal Alternative, the Cañon Drive Staging Yard Alternative would include three levels: the street level, intermediate stairway landing level, and concourse level.

The Cañon Drive Staging Yard Alternative street level would comprise the new station portal entrance/exit, including two elevators, one stairway, and one “up” escalator. Unlike the Project and the Cañon Drive-Half Portal Alternative, public restrooms (two separate stalls/rooms) would be provided on the street level with this alternative. Additionally, this alternative could have a second escalator if a small below-ground portion of the adjacent parcel to the west (Assessor Parcel Number 4343-005-004) were utilized. This would result in additional land needing to be acquired by the City. Adding a second escalator would require approximately 900 square feet of this parcel, with all of it below-ground, therefore, not increasing the surface square footage of this alternative. A covered canopy would also be located above the portal on the street level, which would be enclosed by a translucent glass exterior. The portal would be 12 feet tall on the street level. The adjacent sidewalk would not be extended with this alternative and no permanent traffic lane closures would be required. In addition, removal of on-street parking spaces or street trees would not be required with this alternative. The Cañon Drive Staging Yard Alternative would include an approximately 52-foot-tall ventilation shaft at the southeastern corner of the site. This tunnel ventilation shaft is required by Metro to be at least 40 feet from openings such as station entrances or portals. Due to the limited space available on the site this cannot be achieved by separating the shaft opening horizontally. Instead the opening is raised, resulting in a vertical shaft structure that extends 40 feet above the portal, which would be 12 feet tall, in order to satisfy the Metro requirement.

The intermediate stairway landing level would consist of a landing area serving as a transition between stairways. The walkway or concourse level would consist of an open area with adequate space for passengers to enter and exit from the stairway, escalator, and elevators.

The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates and then to the Wilshire/Rodeo Station walkway previously analyzed in the Purple Line Extension EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed, including public restrooms.

Areas of Controversy and Issues Raised by the Public and Agencies

The City distributed a Notice of Preparation (NOP) for the EIR for a 32-day agency and public review period starting on September 5, 2019 and ending on October 7, 2019. In addition, the City held an EIR Scoping Meeting on September 19, 2019, at Beverly Hills City Hall at 455 North Rexford Drive. The meeting, held from 6:00 pm to 8:00 pm, provided information about the Project and Project Alternatives to members of public agencies, interested stakeholders, and residents/community members, and obtained comments on potential environmental issues that should be addressed in the EIR. Approximately 45 people attended the meeting, including Beverly Hills residents, local business owners, City officials, and project representatives among the attendees. The City received letters from four public agencies in response to the NOP during the public review period, as well as various written public comment letters and verbal comments during the EIR Scoping Meeting.

The NOP is presented in Appendix A of this EIR. In addition, the Project Scoping Report also presented in Appendix A of this EIR provides the agency and public comments received during the public review period related to design and environmental topics. Table 1-1 summarizes the environmental-related comments received and where these issues are addressed in the EIR.

Summary of Environmental Impacts and Mitigation Measures

Table ES-2 (Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts) summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). Impacts are categorized as follows:

Significant and Unavoidable: An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per Section 15093 of the CEQA Guidelines.

Less than Significant with Mitigation Incorporated: An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under Section 15091 of the CEQA Guidelines.

Less than Significant: An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.

No Impact: The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table ES-1 Issues Raised by the Public and Agencies

Commenter	Environmental Comment/Request	Where Comment Was Addressed
Agency Comments		
State of California, Native American Heritage Commission	Stated that the Project would be subject to compliance with Assembly Bills 52 and 18, and recommended consultation with California Native American tribes. In addition, recommendations were provided for the preparation of cultural resources assessments.	Section 3.3, Cultural/Tribal Resources
State of California, Department of Transportation (Caltrans)	Stated that the Project would not likely result in a direct adverse impact to existing State transportation facilities. Discussed possible design strategies for pedestrian and bicyclist safety. Also, stated that a Caltrans transportation permit would be required for the transportation of heavy construction equipment and/or use of oversized-transport vehicles.	Section 3.11, Transportation
South Coast Air Quality Management District (SCAQMD)	Provided recommendations and guidelines for the technical air quality analysis of greenhouse gas required for the Project. Also, discussed potential mitigation strategies, consideration of alternatives, information on permitting, and data sources.	Section 3.2, Air Quality Section 3.6, Greenhouse Gas Emissions
Southern California Association of Governments (SCAG)	Provided general comments on SCAG's role as a Regional Transportation Planning Agency. Provided information on the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), demographics and growth forecasts, and mitigation strategies.	Section 3.11, Transportation Chapter 4, Other CEQA Required Discussions
Public Comments		
Transportation	Any removal of a lane or reduction of a sidewalk on Cañon Drive could impact the flow of Cañon Drive, such an impact should be prevented.	Section 3.11, Transportation
	Analyze and consider safe pedestrian and vehicle routes.	Section 3.11, Transportation
	Consider analyzing impacts to businesses during construction.	Section 3.11, Transportation
	Analyze permanent impacts to traffic and congestion.	Section 3.11, Transportation
	Analyze potential pick-up/drop-off locations and first/last mile connections.	Section 3.11, Transportation
Construction	Analyze duration of construction and construction impacts.	Chapter 2, Project Description Chapter 3, Environmental Impact Analysis (construction impacts)
Alternatives	Consider an additional alternative at the northeast corner of Cañon Drive and Wilshire Boulevard.	Chapter 2, Project Description

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
AESTHETICS & VISUAL QUALITY			
AES-1: Have a substantial adverse effect on a scenic vista.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
AES-2: Substantially degrade scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
AES-3: In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, if the project would conflict with applicable zoning and other regulations governing scenic quality.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Cañon Drive-Half Portal Alternative: Less than significant	No mitigation measures required.	Less than significant
	Cañon Drive Staging Yard Alternative: Significant	AES-A: For the Cañon Drive Staging Yard Alternative, Metro and/or the City shall implement public art, or other visual or architectural features on the exterior surfaces of the ventilation shaft required for the Cañon Drive Staging Yard Alternative in order to ensure this structure would be consistent with other station designs and the visual environment of this portion of the Wilshire Corridor in the City.	Less than significant
AES-4: Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Potentially significant	AES-B: During nighttime construction activities lighting, including “down lighting,” shall be directed toward the interior of the construction staging area and shall be shielded so that it would not spill over into adjacent light-sensitive areas.	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
AIR QUALITY			
AIR-1: Conflict with or obstruct implementation of the applicable air quality plan.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
AIR-2: 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.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
AIR-3: Expose sensitive receptors to substantial pollutant concentrations.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Potentially significant	<p>AIR-A: Construction contractors shall be required to not unnecessarily idle heavy equipment.</p> <p>AIR-B: Construction contractors shall maintain and tune engines per manufacturer's specifications to perform at USEPA certification where applicable, and to perform at verified standards applicable to retrofit technologies. Construction contractors shall also be subject to periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.</p> <p>AIR-C: Construction contractors shall lease new, clean equipment meeting the most stringent of applicable federal or state standards (e.g., Tier 3 or greater engine standards) or best available emissions control technologies on all equipment.</p> <p>AIR-D: Construction equipment and staging zones shall be located away from sensitive receptors and fresh air intakes</p>	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		to buildings and air conditioners. In addition, equipment will be placed to minimize dust and exhaust away from outdoor areas where feasible. Refinements to construction mitigation measures may be incorporated during the final Design phase, prior to the preparation of construction bid documents.	
AIR-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Potentially significant	See Mitigation Measures AIR-A, AIR-B, and AIR-D above. AIR-E: Monitoring and recording of hazardous gas levels at the worksites shall be conducted. In areas of gassy soil conditions, hazardous gas levels in the working environment will be continually monitored and recorded.	Less than significant
BIOLOGICAL RESOURCES			
BIO-1: 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.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	BIO-A: Construction activities, including the clearance of vegetation potentially suitable for special-status bird species, shall occur outside of the nesting season (generally February 15 through September 15). If avoidance of construction activities within this time period is not feasible, the following measures shall be employed: 1. Pre-construction nesting surveys shall be conducted by a qualified biologist both two weeks prior to and within 3 days prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. All nests found shall be recorded. 2. If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, with the exception of an emergency, a qualified biologist shall monitor the nest on a weekly basis and the	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		<p>construction activity shall be postponed until the biologist determines that the nest is no longer active.</p> <p>3. If the recommended nest avoidance zone is not feasible, the qualified biologist shall determine whether an exception is possible and obtain concurrence from the appropriate resource agency before construction work can resume within the avoidance buffer zone. All work shall cease within the avoidance buffer zone until either agency concurrence is obtained or the biologist determines that the adults and young are no longer reliant on the nest site.</p>	
BIO-2: 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.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
BIO-3: 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.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
BIO-4: 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.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
BIO-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
BIO-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
CULTURAL RESOURCES			
CUL-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project: Significant	<p>CUL-A: Wilshire Beverly Center Canopy Removal and Reinstatement. For the historical resource, the Wilshire Beverly Center, a treatment plan for the removal and reinstatement of the existing boxed canopy on the east elevation of the building facing North Beverly Drive shall be required prior to removal of the canopy. The treatment plan shall determine and guide the appropriate removal, storage, and reattachment processes and techniques to avoid or minimize damage to historic materials, in adherence with the Secretary of the Interior's Standards for the Treatment of Historic Properties. An architectural historian or historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) shall prepare or provide input for the treatment plan prior to removal of the canopy. The City shall approve and implement the treatment plan to proceed with the removal of the canopy. Implementation of the treatment plan shall be monitored and approved by an architectural historian or historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61). The monitor shall ensure that the treatment plan is implemented appropriately and provide a monitoring report or memorandum documenting the removal and reinstatement of the canopy.</p> <p>CUL-B: Pre-Construction and Construction Phases. For the historical resources, the Wilshire Beverly Center,</p>	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		California Bank Building, and Beverly Hills Financial Center, further geotechnical investigations shall be undertaken to evaluate soil, groundwater, seismic, and environmental conditions along the alignment. This analysis shall include a pre-construction survey of the historical resources to document their pre-construction conditions and shall assist in the development of appropriate support mechanisms and measures for cut and cover piling and excavation within construction areas. The subsurface investigation should also identify areas that could cause differential settlement as a result of using vibratory construction equipment in close proximity to historical resources. An architectural historian or historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) shall provide input and review of final design documents prior to implementation of the mechanisms and measures. The review shall evaluate whether the geotechnical investigations and support measures for cut and cover and measures to prevent differential settlement meet the Secretary of the Interior's Standards for the Treatment of Historic Properties. The City shall approve the evaluation to proceed with construction.	
	Cañon Drive-Half Portal Alternative: Significant	See Mitigation Measure CUL-B above.	Less than significant
	Cañon Drive Staging Yard Alternative: Less than significant	No mitigation measures required.	Less than significant
CUL-2: Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	CUL-C: Unanticipated Discoveries. If previously unidentified cultural resources are encountered during construction or earth-disturbing activities, all activities within 50 feet of the discovery shall be halted until a qualified archaeologist can examine the resources and assess their significance. If the resources are determined to be	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		<p>significant, the City shall notify the State Historic Preservation Officer within 48 hours of the discovery to determine the appropriate course of action. If human remains are encountered, all work must stop at that location and the County Coroner must be immediately notified and advised of the finding.</p> <p>For resources determined eligible or assumed to be eligible for the Local Register of Historic Properties, the City of Beverly Hills, with the advice of the qualified cultural resources specialist, shall determine a course of action to avoid, minimize, or mitigate adverse effects. Parties may be invited to consult at the discretion of the City of Beverly Hills.</p> <p>For resources determined eligible or assumed to be eligible for the CRHR, the City of Beverly Hills will notify Metro of those actions that it proposes to avoid, minimize, or mitigate adverse effects. Consulting parties will have 48 hours to provide their views on the proposed actions. The City will ensure that timely-filed recommendations of consulting parties are taken into account prior to granting approval of the measures that the City and its partners will implement to resolve adverse effects. The City will carry out the approved measures prior to resuming construction activities in the location of the discovery.</p> <p>The City of Beverly Hills will ensure that the expressed wishes of Native American individuals, tribes, and organizations, and particularly tribal governments, are taken into consideration when decisions are made regarding the disposition of other Native American archaeological materials and records relating to California Native American tribes.</p> <p>Should Native American burials and related items be discovered during construction of the project, the City of Beverly Hills will consult with the affected Native American individuals, tribes, and organizations regarding the treatment</p>	

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		of cultural remains and artifacts. These will be treated in accordance with the requirements of the California Health and Safety Code. If the County Coroner determines that the human remains are or may be of Native American origin, then the discovery shall be treated in accordance with the provisions of PRC Section 5097.98(a)-(d), which provides for the notification of discovery of Native American human remains, descendants; disposition of human remains and associated grave goods.	
CUL-3: Disturb any human remains, including those interred outside of dedicated cemeteries.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	See Mitigation Measure CUL-C above.	Less than significant
ENERGY			
ENE-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Potentially significant	See Mitigation Measures AIR-A and AIR-B above under Air Quality.	Less than significant
ENE-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
GEOLOGY, SOILS, AND MINERAL RESOURCES			
GEO-1: Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: a. 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	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; b. Strong seismic ground shaking; c. Seismic-related ground failure, including liquefaction; and/or d. Landslides.			
GEO-2: Result in substantial soil erosion or the loss of topsoil.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
GEO-3: 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.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	GEO-A: The City shall include geotechnical exploration as identified in the Purple Line Extension EIS/EIR, and methods such as the use of slurry walls, secant pile walls, and other methods to reduce potential settlement, as required.	Less than significant
GEO-4: Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
GEO-5: 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 wastewater.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
GEO-6: Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	GEO-B: The City shall retain the services of a qualified paleontologist to review project plans and consult with construction staff during pre-construction meetings and as needed throughout the construction process. If subsurface	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		<p>resources are identified by a paleontological monitor during construction, all construction activities in the area of identified paleontological resources shall be temporarily halted so that the qualified paleontologist may document and remove any resources as necessary. At the completion of paleontological monitoring for the project, a paleontological resource monitoring report shall be prepared and submitted to the Natural History Museum of Los Angeles County to document the results of the monitoring activities and summarize the results of any paleontological resources encountered.</p> <p>Metro developed a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) for the Purple Line Extension Project that specifically addresses the monitoring procedures for the Purple Line in this area. This PRMMP shall be implemented for the North Portal Project, with slight modifications to address local laws and recognize the City of Beverly Hills as lead agency. The City or Metro shall implement the modified PRMMP during construction.</p> <p>The City shall prepare to the level of identification all vertebrate fossils and the significant invertebrate and plant fossils recovered during the monitoring process.</p> <p>The City shall prepare a report detailing the paleontological resources recovered, their significance, and arrangements made for their curation at the conclusion of the monitoring effort.</p> <p>The City shall provide the resources necessary to curate the identified and prepared fossils in a manner that meets the standards published by the Society of Vertebrate Paleontology. All significant fossils shall be curated at the Natural History Museum of Los Angeles County.</p>	

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
GEO-7: Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
GEO-8: 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.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
GREENHOUSE GAS EMISSIONS			
GHG-1: Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Potentially significant	See Mitigation Measures AIR-A, AIR-B, and AIR-C above under Air Quality.	Less than significant
GHG-2: Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Potentially significant	See Mitigation Measures AIR-A, AIR-B, and AIR-C above under Air Quality.	Less than significant
HAZARDS AND HAZARDOUS MATERIALS			
HAZ-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	HAZ-A: If contaminated groundwater or soils are encountered during construction of the Project or Cañon Drive-Half Portal Alternative, the contractor shall stop work in the vicinity, cordon off the area, and contact the appropriate hazardous waste coordinator and maintenance hazardous spill coordinator and immediately notify the Certified Unified Program Agencies (Los Angeles City Fire Department, Los Angeles County Fire Department, and LARWQCB) responsible for hazardous materials and wastes. Through coordination with the LARWQCB, an	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		investigation and remediation plan shall be developed to protect public health and the environment. The contractor shall properly treat or dispose of any hazardous or toxic materials according to local, state, and federal regulations.	
HAZ-2: 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.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
HAZ-3: Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.	No Project Alternative and the Project: No impact	No mitigation measures required.	No impact
	Cañon Drive-Half Portal Alternative and Cañon Drive Staging Yard Alternative: Less than significant	No mitigation measures required.	Less than significant
HAZ-4: 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.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
HAZ-5: 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, result in a safety hazard or excessive noise for people residing or working in the project area.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
HAZ-6: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Potentially significant	See Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D below under Transportation.	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
HAZ-7: Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
HYDROLOGY AND WATER QUALITY			
HYD-1: Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Potentially significant	See Mitigation Measure HAZ-A above under Hazards and Hazardous Materials.	Less than significant
HYD-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	See Mitigation Measure HAZ-A above under Hazards and Hazardous Materials.	Less than significant
HYD-3: Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
HYD-4: Result in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
HYD-5: Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	See Mitigation Measure HAZ-A above under Hazards and Hazardous Materials.	Less than significant
NOISE			
NOI-1: Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	<p>NOI-A: Noise Barriers. Temporary noise barriers shall be at least 12 feet in height and well-sealed around the construction site with overlapping sections to avoid gaps. Taller temporary noise barriers, up to 20 feet in height, shall be used in areas of predicted impacts, where possible.</p> <p>NOI-B: Equipment Maintenance. Construction equipment shall be maintained to prevent noise due to worn or improperly maintained parts, and shall be maintained with effective noise control devices (i.e., mufflers, lagging, and/or motor enclosures).</p> <p>NOI-C: Electrical Sources. When possible, on-site electrical sources shall be used to power equipment rather than diesel generators.</p> <p>NOI-D: Sensitive Uses. Construction staging areas shall be located away from sensitive uses, as feasible.</p> <p>NOI-E: Sound Curtains. Flexible sound control curtains shall be placed around all drilling apparatuses and drill rigs.</p>	Significant and unavoidable

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		<p>NOI-F: Noise Disturbance Coordinator. A noise and vibration disturbance coordinator shall be established. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator shall determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved.</p> <p>NOI-G: Construction Notice. The construction contractor shall provide a construction notice to residents within 1,000 feet of the construction site. The construction site notice shall include job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by the code or any discretionary approval for the site, and the City telephone number where violations can be reported. The notice will also include the phone number of the noise disturbance coordinator.</p> <p>NOI-H: Construction Phase Noticing. The construction contractor shall provide construction update notices to residences within 1,000 feet of the construction site upon the initiation of each major construction phase (site preparation, drilling, etc.) and shall include the anticipated equipment to be used and duration of the construction phase.</p> <p>NOI-I: Construction Noise Monitoring. As described in the MOA in place between the City and Metro, noise monitoring shall be implemented at the start of the construction phase and noise levels shall be limited to the following:</p> <ul style="list-style-type: none"> - No more than five (5) dBA above pre-existing ambient noise levels at all times at the property line of any residential and transient occupancy buildings 	

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		<p>evaluated on a fifteen (15) minute average noise level (L_{eq} 15 minute);</p> <ul style="list-style-type: none"> - No more than two (2) instances within a one (1) hour period between the hours of 9:00 p.m. and 11:00 p.m. above eighty-five (85) dBA evaluated at an instantaneous maximum noise level (L_{max}) at the property line of any residential and transient occupancy buildings; - No more than one (1) instance within a two (2) hour period between the hours of 11:00 p.m. and 9:00 a.m. above eighty-five (85) dBA evaluated at an instantaneous maximum noise level (L_{max}) at the property line of any residential and transient occupancy buildings; - No more than ten (10) instances within a one (1) week period between the hours of 9:00 p.m. and 9:00 a.m. above eighty-five (85) dBA evaluated at an instantaneous maximum noise level (L_{max}) at the property line of any residential and transient occupancy buildings; or - No more than two (2) instances within a one (1) week period between the hours of 9 p.m. and 9 a.m. above ninety-five (95) dBA evaluated at an instantaneous maximum noise level (L_{max}) at the property line of any residential and transient occupancy buildings. 	
NOI-2: Generate excessive ground borne vibration or ground borne noise levels.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
NOI-3: For a project located within the vicinity of a private airstrip or 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.	The Project and All Alternatives: No impact	No mitigation measures required.	No impact
PUBLIC SERVICES			
PUB-1: 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 Fire Protection.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	See Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D below under Transportation.	Less than significant
PUB-2: 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 Police Protection.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	See Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D below under Transportation.	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
PUB-3: 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 Parks.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
TRANSPORTATION			
TR-1: Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	TRA-A: Traffic Control Plans. Site-specific traffic-control plans will be developed to minimize construction impacts to the degree possible for each work zone location. Traffic control plans will be prepared according to State guidelines and standards and approved by the City of Beverly Hills prior to implementation. Traffic control plans will encompass the necessary components of the street network effected by construction activities, such as travel lane widths, temporary lane closures, detour routes, traffic control devices, signing and striping, temporary access for pedestrians and bicyclists, and temporary business access. During peak travel periods, two travel lanes will be maintained in each direction on Wilshire Boulevard. The traffic control plans will identify pedestrian routes and access to adjacent business during construction. Temporary pedestrian facilities will comply with the requirements of ADA and will be properly signed and lighted. TRA-B: Designated Haul Routes. Haul routes will utilize arterial streets to minimize impacts to circulation and residential neighborhoods. A truck haul route plan will be approved by the City prior to implementation. The plan shall	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		include the haul routes to access the construction site, the allowable headways to avoid platoons of trucks along haul routes, and a schedule of hauling activities expected for each stage of construction. TRA-C: Transportation Management Plan (TMP). A TMP will be prepared and submitted to the City for review and approval prior to implementation. The TMP will include public information regarding construction activities, traveler information, incident management, demand management strategies, and expected construction activities. In addition, the TMP would include parking management to minimize the effects of temporary parking removal during construction and identify adequate off-street parking locations for construction workers. Development of the parking management strategies will be coordinated with the adjacent property owners.	
TR-2: Would the project conflict with CEQA Guidelines section 15064.3, subdivision (b) related to transportation impacts.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
TR-3: Would implementation of the project substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	See Mitigation Measure TRA-A above.	Less than significant
TR-4: Would implementation of the project result in inadequate emergency access.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	TRA-D: Emergency Vehicle Access. Emergency vehicle access will be maintained at all times to the construction work site, adjacent businesses, and adjacent residential areas. Emergency vehicle access will also be maintained at all times to and from fire stations, hospitals, and medical facilities near the construction site and along the haul routes. Construction activities, road closures, and lane closures will	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		be coordinated with local law enforcement and fire department officials prior to implementation.	
TRIBAL CULTURAL RESOURCES			
TCR-1: Cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
TCR-2: Cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Significant	<p>TCR-A: Retain a Native American Monitor. A Native American monitor who is ancestrally affiliated with the project area shall be retained by the lead agency or owner of the project to be on site to monitor all project-related, ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.). A monitor associated with one of the Tribal governments which have commented on the project shall provide the Native American monitor. The Native American monitor shall be required to maintain documentation of activities monitored and daily finds that shall be kept confidential by the Principal Archaeologists but which may be shared on request with Native American tribal governments recognized by the Native American Heritage Commission of the State of California.</p> <p>TCR-B: Unanticipated Discovery of Tribal Cultural Resources. In the event the Native American or archaeological monitor identifies a potential tribal cultural resource, the monitor shall be given the authority to temporarily halt construction within 50 feet of the discovery and to contact the qualified or Principal Archaeologist.</p>	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
		Construction activities can continue in areas more than 50 feet (15 meters) away from the find. The qualified or Principal Archaeologist shall investigate the find and recommend whether it is eligible for inclusion in the CRHR. Additional work such as archaeological testing may be required to make this recommendation. Tribal governments that have commented on the project will be apprised of the findings. The lead agency, in consultation with interested tribes and with the input of the qualified archaeologist, shall determine whether the resource is a tribal cultural resource under CEQA and significant. If the discovery is determined to be a significant tribal cultural resource, the lead agency shall consult with interested tribal governments in order to determine an avoidance or treatment strategy.	
UTILITIES AND SERVICE SYSTEMS			
UTIL-1: Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
UTIL-2: Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
UTIL-3: Result in a determination by the waste water 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.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant

Table ES-2 Summary of Environmental Impacts, Mitigation Measures, and Residual Impacts

Potential Environmental Impacts	Significance Determination	Mitigation Measure(s)	Residual Impact
UTIL-4: Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant
UTIL-5: Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	No Project Alternative: No impact	No mitigation measures required.	No impact
	The Project and Project Alternatives: Less than significant	No mitigation measures required.	Less than significant

1. INTRODUCTION

This document is an Environmental Impact Report (EIR) for a proposed Wilshire/Rodeo Station North Portal entrance. The proposed North Portal for the Westside Purple Line Subway Extension's Wilshire/Rodeo Station would provide direct access to dense commercial activity centers located north of Wilshire Boulevard. For EIR analysis purposes, the Project consists of a half portal entrance/exit to the Wilshire/Rodeo Station on the west side of Beverly Drive, north of Wilshire Boulevard. Two Project Alternatives are being considered for the North Portal: (1) a half portal on the west side of Cañon Drive north of Wilshire Boulevard; and (2) a half portal in Metro's existing construction staging yard along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive. The Project (Beverly Drive) and Project Alternatives are shown on Figure 1-1 (Westside Purple Line Wilshire/Rodeo Station North Portal Project and Alternatives).

This chapter discusses (1) the basis for preparing an EIR; (2) the scope and content of the EIR; and (3) the environmental review process required under the California Environmental Quality Act (CEQA); and (4) the EIR background. The Project and Project Alternatives are described in detail in Chapter 2 (Project Description).

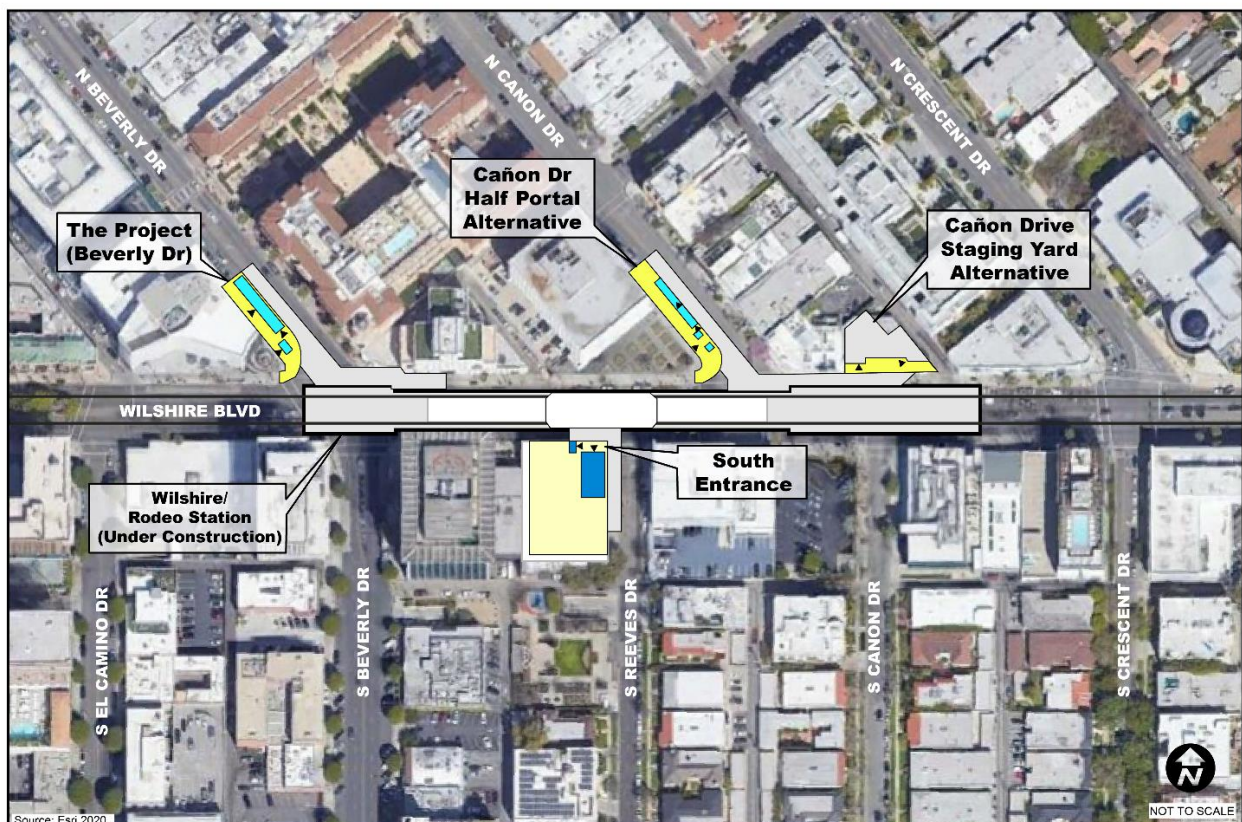


Figure 1-1 Westside Purple Line Wilshire/Rodeo Station North Portal Project and Alternatives

1.1 Purpose and Legal Authority

The Project requires the discretionary approval by the City of Beverly Hills City Council. Therefore, the Project is subject to the environmental review requirements of CEQA. In accordance with Section 15121 of the CEQA Guidelines (California Code of Regulations [CCR], Title 14), the purpose of this EIR is to serve as an informational document that:

“...will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project.”

This EIR has been prepared as a Project EIR pursuant to Section 15161 of the CEQA Guidelines. A Project EIR is appropriate for a specific development project. As stated in the CEQA Guidelines:

“This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation.”

This EIR serves as an informational document for the public and City decision makers. The EIR review process will include public meetings before the City Council to consider approval of the Project or a Project Alternative, and certification of the Final EIR would be considered by the City Council.

1.2 Scope and Content

The following environmental issue areas are analyzed in this EIR in the appropriate level of detail. The environmental issue areas identified with an asterisk were determined to have less than significant impacts, and are therefore included in Chapter 4 (Other CEQA Considerations) with a brief analysis. The remaining environmental issue areas below are fully analyzed in Chapter 3 (Environmental Impacts Analysis):

- Agricultural / Forestry Resources*
- Aesthetics & Visual Quality
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology / Soils
- Greenhouse Gas Emissions
- Hazards / Hazardous Materials
- Hydrology / Water Quality
- Land Use / Planning*
- Mineral Resources
- Noise
- Population / Housing*
- Public Services
- Recreation*
- Transportation
- Tribal Cultural Resources
- Utilities / Service Systems
- Wildfire*

In preparing the EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Chapter 7 (References).

The Project Alternatives section of the EIR (Section 2.5) was prepared in accordance with Section 15126.6 of the CEQA Guidelines and focuses on alternatives that are capable of

eliminating or reducing significant adverse effects associated with the Project while feasibly attaining most of the basic project objectives. In addition, Chapter 5 (Comparison of Alternatives) identifies the "environmentally superior" alternative among the alternatives assessed. The alternatives evaluated include the CEQA-required "No Project" alternative, the Project, and two Project Alternatives.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. Section 15151 of the CEQA Guidelines provides the standard of adequacy on which this document is based. The Guidelines state:

"An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure."

1.2.1 CEQA Updates

In 2018, changes to the CEQA Guidelines were implemented to include the participation of and evaluate potential environmental impacts on tribal cultural resources, in addition to updates to the standard metrics used for evaluating transportation impacts and providing CEQA exemptions for projects sites located in transit-oriented development (TOD) or infill areas.

The evaluation of project alternatives is consistent with CEQA Guidelines provided in Assembly Bill (AB) 52, which state:

"A project with an effect that may cause a substantial adverse change in the significance of a tribal culture resource, as defined, is a project that may have a significant effect on the environment."

Furthermore, Senate Bill (SB) 743 (Section 15064.3 required the Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Particularly within areas served by transit, those alternative criteria must:

"Promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (Public Resources Code Section 21099(b)(1).)
Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

1.3 Lead, Responsible, and Trustee Agencies

The CEQA Guidelines define lead, responsible, and trustee agencies. The City of Beverly Hills is the lead agency for the Project as it holds principal responsibility for approving the Project of Project Alternatives.

A responsible agency refers to a public agency other than the lead agency that has discretionary approval over the project. The Los Angeles Metropolitan Transportation Authority (Metro), which maintains and operates public transportation in the region is the only responsible agency for this project at this time. Metro will incorporate the Project or Project Alternatives into its system and will be responsible for the operation and maintenance of the portal upon its completion. The EIR will also be submitted to Metro for review and comment.

A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies identified for the Project.

1.4 Environmental Review Process

The environmental impact review process, as required under CEQA, is summarized below. The steps are presented in sequential order.

1. **Notice of Preparation (NOP).** After deciding that an EIR is required, the lead agency (City of Beverly Hills) must file an NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (CEQA Guidelines Section 15082; PRC Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts. An Initial Study was not prepared for this project, as all environmental issue areas are being analyzed in the EIR.
2. **Draft EIR Prepared.** The Draft EIR must contain a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion (NOC).** The lead agency must file an NOC with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the NOC in the County Clerk's office for 30 days (PRC Section 21092) and send a copy of the NOC to anyone requesting it (CEQA Guidelines Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (PRC Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (PRC 21091).

4. **Final EIR.** A Final EIR must include a) the Draft EIR; b) copies of comments received during public review; c) list of persons and entities commenting on the Draft EIR; d) responses to comments; and e) revisions and clarifications to the Final EIR made in response to comments and information received on the Draft EIR.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that a) the Final EIR was completed in compliance with CEQA; b) the Final EIR was presented to the decision-making body of the lead agency; and c) the decision-making body reviewed and considered the information in the Final EIR prior to approving a project (CEQA Guidelines Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects; b) require changes to the project to reduce or avoid significant environmental effects; or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (CEQA Guidelines Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations.** For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (CEQA Guidelines Sections 15091, 15092, and 15093). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures that were adopted or made conditions of project approval to mitigate significant effects (CEQA Guidelines Section 15097).
9. **Notice of Determination (NOD).** The lead agency must file an NOD after deciding to approve a project for which an EIR is prepared (CEQA Guidelines Section 15094). A local agency must file the NOD with the County Clerk. The NOD must be posted for 30 days and sent to anyone previously requesting notice. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

1.5 Environmental Impact Report Background

The City distributed an NOP for the EIR for a 32-day agency and public review period starting on September 5, 2019 and ending on October 7, 2019. In addition, the City held an EIR Scoping Meeting on September 19, 2019, at Beverly Hills City Hall at 455 North Rexford Drive. The meeting, held from 6:00 pm to 8:00 pm, provided information about the Project and Project Alternatives to members of public agencies, interested stakeholders, and residents/community members, and obtained comments on potential environmental issues that should be addressed in the EIR. Approximately 45 people attended the meeting, including Beverly Hills residents, local business owners, City officials, and project representatives among the attendees. The City received letters from four public agencies in response to the NOP during the public review

period, as well as various written public comment letters and verbal comments during the EIR Scoping Meeting. The NOP is presented in Appendix A of this EIR. In addition, the Project Scoping Report presented in Appendix A of this EIR provides the agency and public comments received during the public review period related to design and environmental topics. Table 1-1 summarizes the environmental-related comments received and where these issues are addressed in the EIR.

Table 1-1 NOP Comments and EIR Response

Commenter	Environmental Comment/Request	Where Comment Was Addressed
Agency Comments		
State of California, Native American Heritage Commission	Stated that the Project would be subject to compliance with Assembly Bill 52 and Senate Bill 18, and recommended consultation with California Native American tribes. In addition, recommendations were provided for the preparation of cultural resources assessments.	Section 3.3, Cultural/ Tribal Resources
State of California, Department of Transportation (Caltrans)	Stated that the Project would not likely result in a direct adverse impact to existing State transportation facilities. Discussed possible design strategies for pedestrian and bicyclist safety. Also, stated that a Caltrans transportation permit would be required for the transportation of heavy construction equipment and/or use of oversized-transport vehicles.	Section 3.11, Transportation
South Coast Air Quality Management District (SCAQMD)	Provided recommendations and guidelines for the technical air quality analysis of greenhouse gas required for the Project. Also, discussed potential mitigation strategies, consideration of alternatives, information on permitting, and data sources.	Section 3.2, Air Quality Section 3.6, Greenhouse Gas Emissions
Southern California Association of Governments (SCAG)	Provided general comments on SCAG's role as a Regional Transportation Planning Agency. Provided information on the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), demographics and growth forecasts, and mitigation strategies.	Section 3.11, Transportation Chapter 4, Other CEQA Required Discussions
Public Comments		
Transportation	Any removal of a lane or reduction of a sidewalk on Cañon Drive could impact the flow of Cañon Drive, such an impact should be prevented.	Section 3.11, Transportation
	Analyze and consider safe pedestrian and vehicle routes.	Section 3.11, Transportation
	Consider analyzing impacts to businesses during construction.	Section 3.11, Transportation
	Analyze permanent impacts to traffic and congestion.	Section 3.11, Transportation
	Analyze potential pick-up/drop-off locations and first/last mile connections.	Section 3.11, Transportation

Table 1-1 NOP Comments and EIR Response

Commenter	Environmental Comment/Request	Where Comment Was Addressed
Construction	Analyze duration of construction and construction impacts.	Chapter 2, Project Description Chapter 3, Environmental Impact Analysis (construction impacts)
Alternatives	Consider an additional alternative at the northeast corner of Cañon Drive and Wilshire Boulevard.	Chapter 2, Project Description

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2. PROJECT DESCRIPTION

This chapter provides a description of the proposed North Portal for the Westside Purple Line Subway Extension's Wilshire/Rodeo Station evaluated in Chapter 3 of this EIR. The project background, purpose and need, objectives, location, and environmental setting are described, followed by a description of the Project and Project Alternatives characteristics, construction scenario, and summary of permits and approvals that would be required with the implementation of the project. The EIR analyzes the Project, Cañon Drive-Half Portal Alternative, and the Cañon Drive Staging Yard Alternative, collectively referred to as the Project and Project Alternatives, at a similar level of detail. As such, the Project and each alternative is described in detail in the project description. Additional descriptions of the environmental setting as it relates to each of the environmental issue areas analyzed in this EIR are included in the environmental setting discussion contained within Chapter 3 of this EIR. This information is provided pursuant to CEQA Guidelines Section 15124 and is intended to serve as a general description of the project's technical, economic, and environmental characteristics, considering the engineering proposals and public service facilities.

2.1 Background Overview

2.1.1 Purple Line Extension Project Background

The Purple Line Extension will extend the existing Purple Line subway (also known as Metro D Line) from its current terminus at Wilshire/Western to a proposed new station in Westwood. The Purple Line Extension Project has also formally been referred to as the Westside Subway Extension Project in previous documents.

The Federal Transit Administration (FTA) and Metro prepared the Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Westside Subway Extension Project in 2010 pursuant to the National Environmental Policy Act (NEPA) and CEQA (FTA & Metro, 2010). The Draft EIS/EIR evaluated a No Build Alternative, a Transportation System Management Alternative, and five heavy rail subway alternatives. In October 2010, after deliberation of the benefits and impacts of all the alternatives analyzed and public comments received during the public comment period, the Metro Board of Directors identified Alternative 2 (Westwood/Veterans Affairs [VA] Hospital Extension) as the Locally Preferred Alternative (LPA).

During the Draft EIS/EIR phase, Metro engaged with the community and relevant stakeholders via a series of Station Information Meetings held between October and November 2009, to solicit input from the public regarding potential station entrance locations at the Wilshire/Rodeo Station. In February 2012, a Station Entrance Location Report and Recommendations was prepared by Metro to support the Westside Subway Extension Project Final EIS/EIR, to identify preferred station locations and entrance alternatives for the subway project, as well as to provide a rationale for screening options down to a single entrance for inclusion within the Final EIS/EIR (Metro, 2012).

The report provided a review of the five station entrance alternatives considered for the Wilshire/Rodeo Station in the Draft EIS/EIR. Station entrance screening was undertaken using a two-step process that considered the constructability, undue costs, and fatal flaws of each alternative against public input, planning, environmental, and engineering constraints, as well as the ability for each alternative to support the Westside Subway Extension Project objectives, such as providing linkages to existing transportation options, employment hubs, activity centers,

and neighborhoods. Upon evaluation of these inputs, a single entrance for the Wilshire/Rodeo Station was recommended for inclusion in the Final EIS/EIR (Metro, 2012).

The three station entrance alternatives considered in the Station Entrance Location Report and Recommendations document included: The Union Bank Building site at Wilshire Boulevard and El Camino Drive; the Ace Gallery site at the southwest corner of Wilshire Boulevard and Reeves Drive; and the Bank of America site at the northwest corner of Wilshire Boulevard and Beverly Drive (Metro, 2012).

The Ace Gallery site was selected by Metro as the preferred primary station entrance for the Wilshire/Rodeo Station. This site had been previously identified for demolition, with the land to be used as a construction and staging site for the Purple Line Extension Project. Following construction of the subway, the repurposing of this residual land for a station entrance portal was found to reduce the need for any additional property acquisitions or demolition of existing occupied buildings at this site. Metro also determined that this location would result in fewer impacts to any potentially historic buildings, businesses, parking, and traffic, and would be consistent with the public preferred option (Metro, 2012).

Following the selection of a preferred station entrance location, Metro also recommended that future consideration to provide secondary station access on the north side of Wilshire Boulevard should be undertaken. This would provide passenger connectivity to Rodeo Drive and the Business Triangle, as well as address additional public suggestions. It was concluded that knock-out panels would be provided near the southwest and northwest corners of the Wilshire Boulevard and Beverly Drive intersection to support this recommendation (Metro, 2012).

Section 1 of the Purple Line Extension Project is currently under construction and is expected to begin operations in 2023. Section 1 includes three new stations (Wilshire/La Brea, Wilshire/Fairfax, and Wilshire/La Cienega). The Metro Board of Directors approved Sections 2 and 3 of the Purple Line Extension Project in May 2012. Section 2 of the Purple Line Extension project is also currently under construction and is expected to begin operations in 2025. Section 2 includes two new stations at Wilshire/Rodeo and Century City/Constellation. Section 3 of the Purple Line Extension Project is currently in pre-construction and is anticipated to open for operations in 2026. Section 3 includes two new stations (Wilshire/Westwood and Wilshire/VA Hospital).

In November 2017, the FTA issued a Supplemental EIS and Section 4(f) Evaluation pursuant to NEPA for Section 2 of the Purple Line Extension project, including a Supplemental Record of Decision (FTA & Metro, 2017). The Supplemental EIS stated that the Wilshire/Rodeo Station will be designed with a knockout panel, allowing for the development of a future station entrance on the north side of Wilshire Boulevard.

2.1.2 Wilshire/Rodeo Station North Portal Project Background

In 2018 in response to stakeholder requests, the City approached Metro to provide a North Portal entrance/exit for the Wilshire/Rodeo Station on the north side of Wilshire Boulevard. Through the provision of the North Portal, the City seeks to provide enhanced passenger access to the Beverly Hills Business Triangle and minimize pedestrian crossings on Wilshire Boulevard, which is a prime local and regional destination and a key hub for tourism, shopping, and dining experiences bounded by North Santa Monica Boulevard to the north, Wilshire Boulevard to the south, and Crescent Drive to the east. The north of Wilshire Boulevard in the station area is also a major employment center and the City is seeking to support commuting workers in this area through the provision of a more convenient station entrance/exit that will

minimize the need for pedestrians to cross Wilshire Boulevard to improve pedestrian access, reduce the risks of automobile/pedestrian conflicts, and avoid traffic congestion.

Three potential station entrance/exit locations have been identified on the north side of Wilshire Boulevard. For EIR analysis purposes, the “Project” (Beverly Drive) consists of a half portal entrance/exit on the west side of Beverly Drive, north of Wilshire Boulevard. Two alternative locations for a half portal are being analyzed as Project Alternatives, one located on the west side of Cañon Drive north of Wilshire Boulevard, and the second located on the construction staging yard established for the Section 2 project located along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive.

2.2 Purpose and Need

The purpose of the project is to provide an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard thereby delivering improved and direct public access to the Beverly Hills Business Triangle, a prime local and regional destination and a key hub for tourism, shopping, and dining experiences. The North Portal is expected to improve pedestrian safety and vehicle access by minimizing pedestrian crossings from the southern to northern sides of Wilshire Boulevard. In addition, the northern side of the Wilshire/Rodeo Station is a major employment center. The City seeks to support commuting workers in this area with a more convenient station entrance/exit. Therefore, the need for the project is:

- To provide a second entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard to serve the Business Triangle.
- To improve pedestrian safety by providing more than one entrance/exit to reduce pedestrian vehicle conflicts.

2.3 Project Objectives

In accordance with CEQA Guidelines Section 15124, the primary objectives of the project are to:

- Provide direct access from the north side of Wilshire Boulevard to the Wilshire/Rodeo Purple Line Station.
- Provide direct pedestrian access to jobs, retail, and amenities in the City’s business triangle
- Improve pedestrian flow and avoid significant degradation of vehicular flow in the vicinity of the Wilshire/Rodeo Purple Line Stations
- Minimize pedestrian street crossings on Wilshire Boulevard

2.4 Project Setting and Location

As shown on Figure 2-1 the Project and Project Alternatives are located within the City of Beverly Hills, north of and adjacent to the existing footprint of the Wilshire/Rodeo Station, which is part of Section 2 of the Purple Line Extension project (**Error! Reference source not found.**). The Wilshire/Rodeo Station, which is currently under construction, will be located immediately

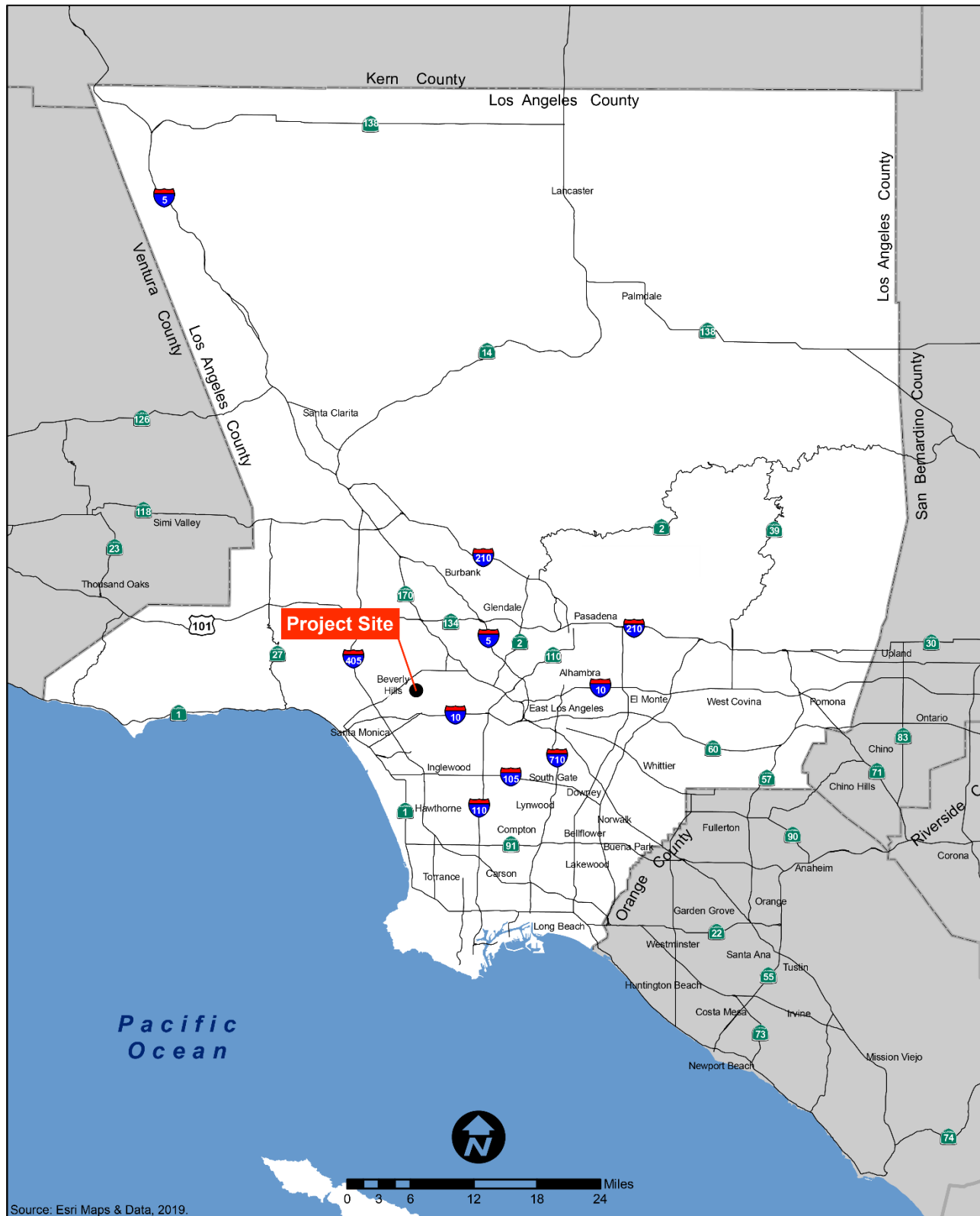


Figure 2-1 Regional Location Map



Figure 2-2 Westside Subway Purple Line Extension Project and the North Portal Project

beneath Wilshire Boulevard and extending from approximately Beverly Drive to the alley (adjacent to Crescent Drive) between Cañon and Crescent Drives. The Wilshire/Rodeo Station that is under construction will include one entry/exit located on the southwest corner of Wilshire Boulevard and Reeves Drive. Figure 2-3 shows the location of the Project, as well as the Project Alternatives, other than the No Project Alternative, being considered, as listed below:

- The Project: A half portal located on the west side of North Beverly Drive, within the existing right-of-way (ROW), north of Wilshire Boulevard.
- Cañon Drive-Half Portal Alternative: Located on the west side of North Cañon Drive, within the existing ROW, north of Wilshire Boulevard.
- Cañon Drive Staging Yard Alternative: Located in the construction staging yard established for construction of the Wilshire/Rodeo Station located along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive.

The location of the Project and Project Alternatives is bound by North Beverly Drive to the west, the alley adjacent to North Crescent Drive to the east, Clifton Way to the north and Wilshire Boulevard to the south, which is predominantly flat, with a slight incline gradient when traveling in a northerly direction. Generally, the Project and Project Alternatives sites are located in an area that is characterized as a developed commercial area. Buildings surrounding the sites are typically multi-story and used predominately for business/commercial and/or residential purposes. The area is a prime local and regional shopping destination and key hub for tourists and others to visit the City and experience the shopping and dining located in the Business Triangle north of Wilshire Boulevard. The streets adjacent to the Project and Project Alternatives are generally landscaped, mostly with potted flowers and greenery, established street trees, and/or palm trees. The northwest corner of the intersection of Wilshire Boulevard and North Beverly Drive contains a public art installation. The area north of Wilshire Boulevard also supports a number of businesses and their employees and is considered a significant employment area within the City.

The roads located adjacent to the location of the Project and Project Alternatives include busy thoroughfares such as Wilshire Boulevard, Rodeo Drive, North Beverly Drive, North Cañon Drive, and North Crescent Drive. Public sidewalks for pedestrians are provided on both sides of these roads and designated pedestrian crossings are located at all major intersections in the area. The location of the Project and Project Alternatives can be accessed locally via North or South Santa Monica Boulevards from the north and/or from the immediately adjacent Wilshire Boulevard. Regional access is provided via Interstate 10, located approximately 2.5 miles to the south, and Interstate 405 (I-405), located approximately 3 miles to the west of the location of the Project and Project Alternatives.

The Project site and Cañon Drive-Half Portal Alternative site are located within the public ROW, which includes roadways and sidewalks. The Cañon Drive Staging Yard Alternative site is located on property that has a General Plan land use designation of Commercial Low-Density General and is zoned C-3 (Commercial), as defined by the City's Zoning Ordinance and the Land Use Element of the General Plan (City of Beverly Hills, 2010). Uses permitted in the C-3 Commercial Zone include commercial uses, such as cafes, offices, and retail shops. The project is not anticipated to require amendments to the City's General Plan or the Beverly Hills Municipal Code.



Figure 2-3 Location of the Project (Beverly Drive) and Project Alternatives

2.4.1 The Project (Beverly Drive)

The Project would be located on the west side of North Beverly Drive, within the existing street and sidewalk ROW, north of Wilshire Boulevard (Figure 2-3). The Project footprint would be approximately 9,200 square feet and would extend from its connection to the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 165 feet north up North Beverly Drive. North Beverly Drive is a bi-directional four-lane roadway with one southbound right-turn lane, with parking lanes on both sides of the street. North Beverly Drive, in the location of the project is approximately 60 feet wide, and is a key thoroughfare providing a northwest to southeast travelling route through the City of Beverly Hills. Six existing trees are located within the Project site along the sidewalk on the west side of Beverly Drive, as well as three existing on-street parking spaces.

Metro Bus Line 14/37 is a local service bus and has frequent stops along Beverly Drive in the City. Within the project site the bus route was slightly modified in 2017 in conjunction with the advanced utility work being conducted for the Section 2 project and the intermittent closure of the eastbound left-turn lane from Wilshire Boulevard onto North Cañon Drive and temporary cul-de-sac.

2.4.2 Cañon Drive-Half Portal Alternative

The Cañon Drive-Half Portal Alternative would be located on the west side of Cañon Drive, within the existing street and sidewalk ROW, north of Wilshire Boulevard (Figure 2-3). The footprint would be approximately 8,100 square feet and would extend from its connection to the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 195 feet north along North Cañon Drive. North Cañon Drive is a bi-directional four-lane roadway and is approximately 55 feet wide in the location of the proposed alternative. On-street parking is provided on both sides of North Cañon Drive, approximately 100 feet north of the Wilshire Boulevard intersection, as well as valet zones for local businesses on the east side of North Cañon Drive. Seven existing trees are located within the site along the sidewalk on the west side of Cañon Drive, as well as three existing on-street parking spaces.

2.4.3 Cañon Drive Staging Yard Alternative

The Cañon Drive Staging Yard Alternative would be located in the construction staging yard established for the Section 2 project, as well as the adjacent public sidewalk, located along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive (Figure 2-3). The footprint of this alternative would be approximately 3,800 square feet and would occupy Assessor Parcel Numbers 4343-005-901 and 4343-005-900. Four existing trees were located within the site along the sidewalk on the north side of Wilshire Boulevard, and have been temporarily removed for construction of the Wilshire/Rodeo Station. No existing parking spaces are located within this site. Additionally, this alternative could have a second escalator if a small below-ground portion of the adjacent parcel to the west (Assessor Parcel Number 4343-005-004) were utilized. This would result in additional land needing to be acquired by the City. Adding a second escalator would require approximately 900 square feet of this parcel, with all of it below-ground, therefore, not increasing the surface square footage of this alternative.

2.4.4 Surrounding Land Uses

The Project (Beverly Drive)

The Project site is located within the existing North Beverly Drive ROW and is bordered by the Maybourne Beverly Hills Hotel (formerly known as the Montage Beverly Hills Hotel) to the east, Bank of America Financial Centre offices to the southeast, Union Bank offices to the south, and Chase Bank Offices to the west. The MGM Studios building is located to the north of the Project site and the surrounding area is generally occupied by fitness centers, restaurants, and retail establishments.

Cañon Drive-Half Portal Alternative

The Cañon Drive-Half Portal Alternative is located within the existing North Cañon Drive ROW and is immediately bordered by the Bank of the West office to the west, and Coldwell Banker Real Estate Offices and Spago to the east. On the opposite side of Wilshire Boulevard, East West Bank offices are located to the southeast of this site and US Bank Offices and carpark to the south. These offices provide leased office space to multiple businesses.

Cañon Drive Staging Yard Alternative

This alternative proposes to use this land for the construction of a half portal. Neighboring the staging yard is the Coldwell Banker Real Estate Offices to the northwest and the Torrey Pines Bank offices and other similar offices and retail services such as Spago to the east. The area immediately on the south side of Wilshire Boulevard to the proposed alternative site is a Ferrari car dealership, the East West Bank offices, and the US Bank Offices and carpark. These offices provide leased office space to multiple businesses. Sixty Beverly Hills Hotel is located approximately 300 feet to the southeast and AKA Beverly Hills extended stay hotel is located approximately 75 feet northeast on North Crescent Drive.

2.5 Project Alternatives

Discussed below are the characteristics of the Project and Project Alternatives. Figure 2-4 shows an overview of the Project and Project Alternatives.

2.5.1 No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. In addition, planned municipal projects as shown in Table 2-1 List of Related Projects) would still be developed in the area. The only means of ingress and egress to the Wilshire/Rodeo Station would be at the currently proposed portal on the south side of Wilshire Boulevard at Reeves Drive.

2.5.2 The Project (Beverly Drive)

The Project would comprise a station portal entrance/exit within the existing ROW on the west side of North Beverly Drive, north of Wilshire Boulevard. The footprint of this alternative would

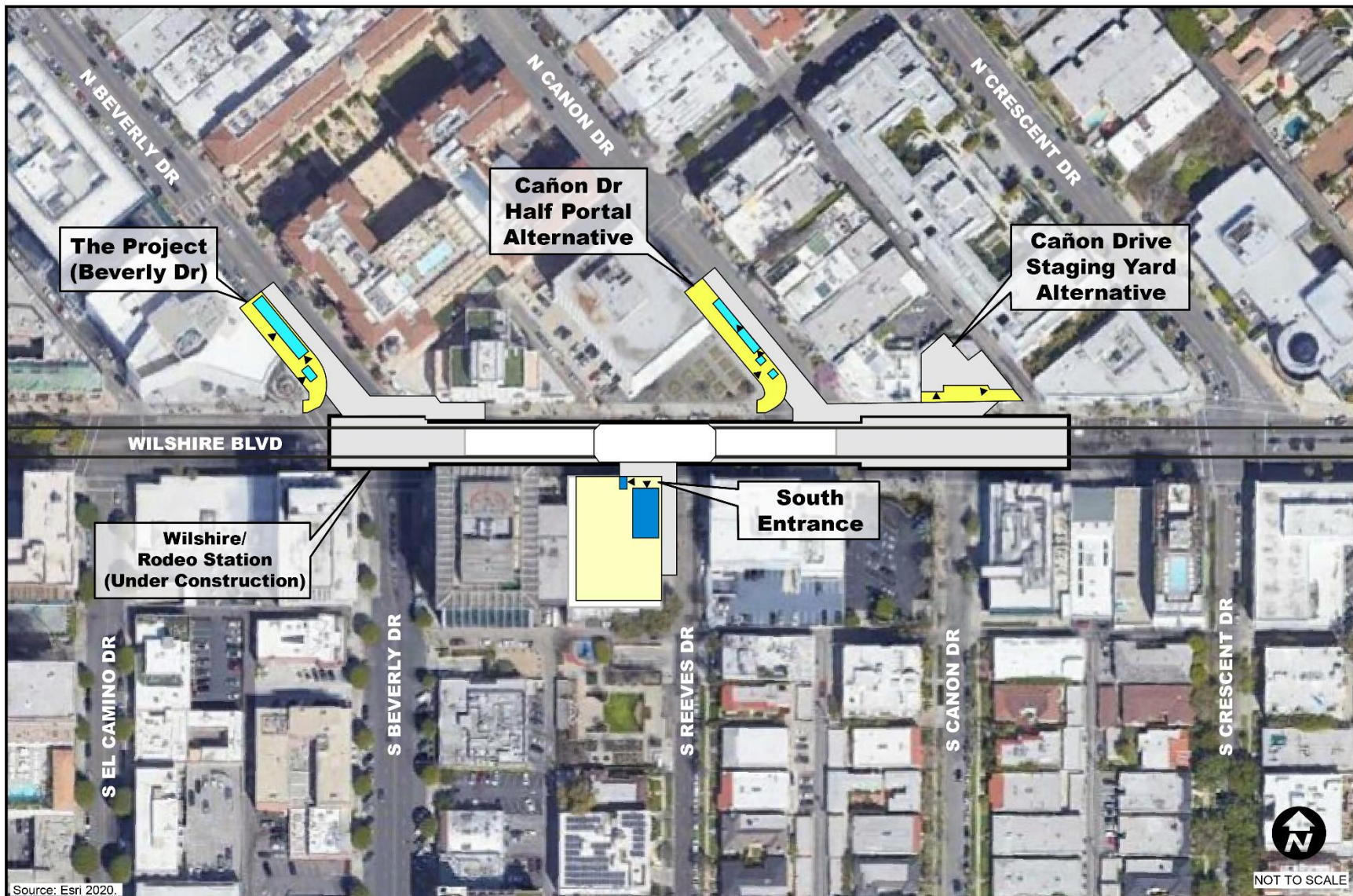


Figure 2-4 Purple Line Wilshire/Rodeo Station North Portal Project and Alternatives

be approximately 9,200 square feet and would extend from its connection to the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 165 feet north along North Beverly Drive.

As shown in Figure 2-5, three levels would be provided at the new entrance/exit. As shown on Figure 2-5, the street level would comprise the new station portal entrance/exit, including two elevators, one stairway, and one “up” escalator. A covered canopy would also be located above the portal on the street level, which would be enclosed by a translucent glass exterior. The portal would be 12 feet tall on the street level. The adjacent sidewalk would be extended. The Project would impact a total of five existing street trees. Four trees located on the west side of Beverly Drive would require relocation within the site, and one tree would be permanently removed and potentially relocated elsewhere in the area as feasible. Other new landscaping may be provided with the Project. Three on-street parking spaces would be permanently removed along the west side of Beverly Drive, and six on-street parking spaces would be permanently removed along the east side of Beverly Drive. The Project would require removal of the majority of the southbound right-turn pocket on the west side of Beverly Drive, just north of Wilshire Boulevard. The proposed configuration of the Project would consist of one through lane and one shared through-right-turn lane on the southbound Beverly Drive approach. Therefore, two southbound travel lanes would be maintained, as well as two northbound travel lanes.

The intermediate stairway landing level would consist of a landing area serving as a transition between stairways. The walkway or concourse level shown on Figure 2-7 would consist of an open area with adequate space for passengers to ingress and egress from the stairway, escalator, and elevators. The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates and then to the Wilshire/Rodeo Station walkway previously analyzed in the Purple Line Extension EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed.

2.5.3 Cañon Drive-Half Portal Alternative

The Cañon Drive-Half Portal Alternative would comprise a station portal entrance/exit within the existing ROW on the west side of Cañon Drive, north of Wilshire Boulevard. The footprint of this alternative would be approximately 8,100 square feet and would extend from its connection with the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 195 feet north along North Cañon Drive.

Similar to the Project, and as shown on Figure 2-8, the Cañon Drive-Half Portal Alternative would include three levels. As shown on Figure 2-9, the street level would comprise the north portal entrance/exit, including two elevators, one stairway, and one “up” escalator. A covered canopy would also be located above the portal on the street level, which would be enclosed by a translucent glass exterior. The portal would be 12 feet tall on the street level. The adjacent sidewalk would not be extended with this alternative. Five trees located on the west side of Cañon Drive would be permanently removed, and potentially relocated elsewhere in the area as feasible. Three on-street parking spaces would be permanently removed along the west side of Cañon Drive, and eight on-street parking spaces would be permanently removed along the east side of Cañon Drive. No traffic lanes would require permanent removal. Therefore, the two southbound right-turn and left-turn travel lanes would be maintained, as well as two northbound travel lanes.

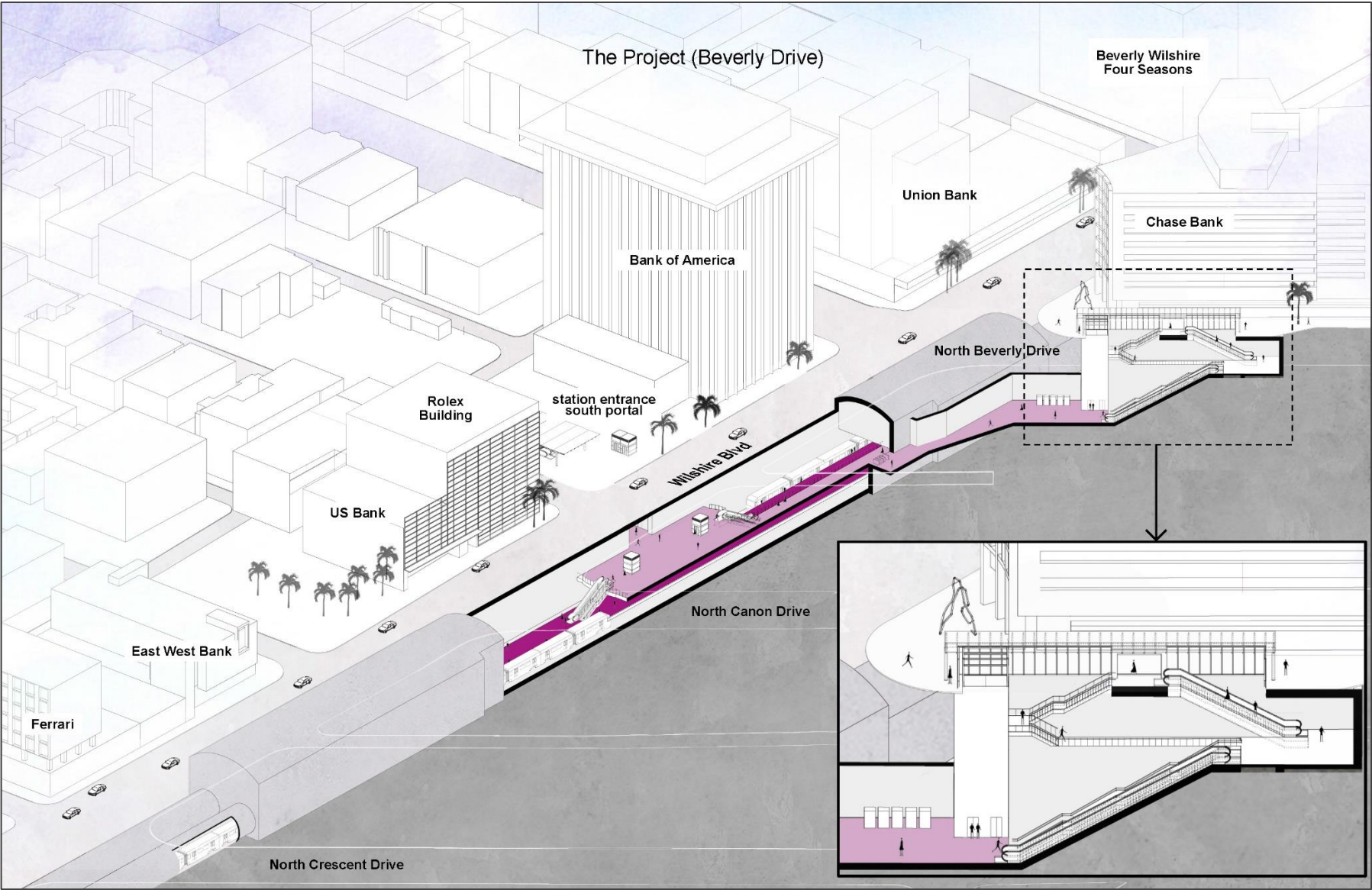


Figure 2-5 Project (Beverly Drive) Three-Dimensional Overview

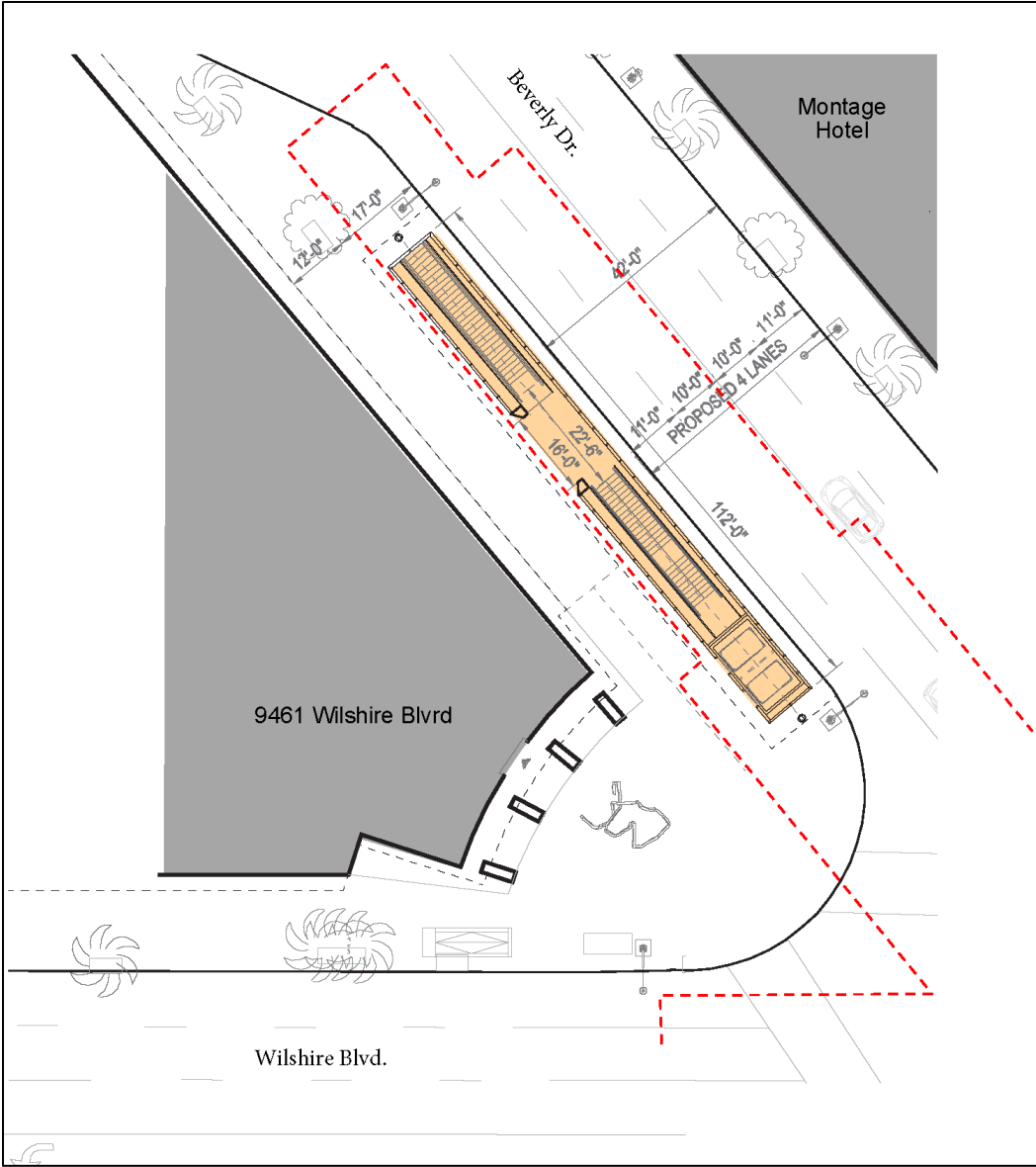


Figure 2-6 Project (Beverly Drive) Street Level Plan

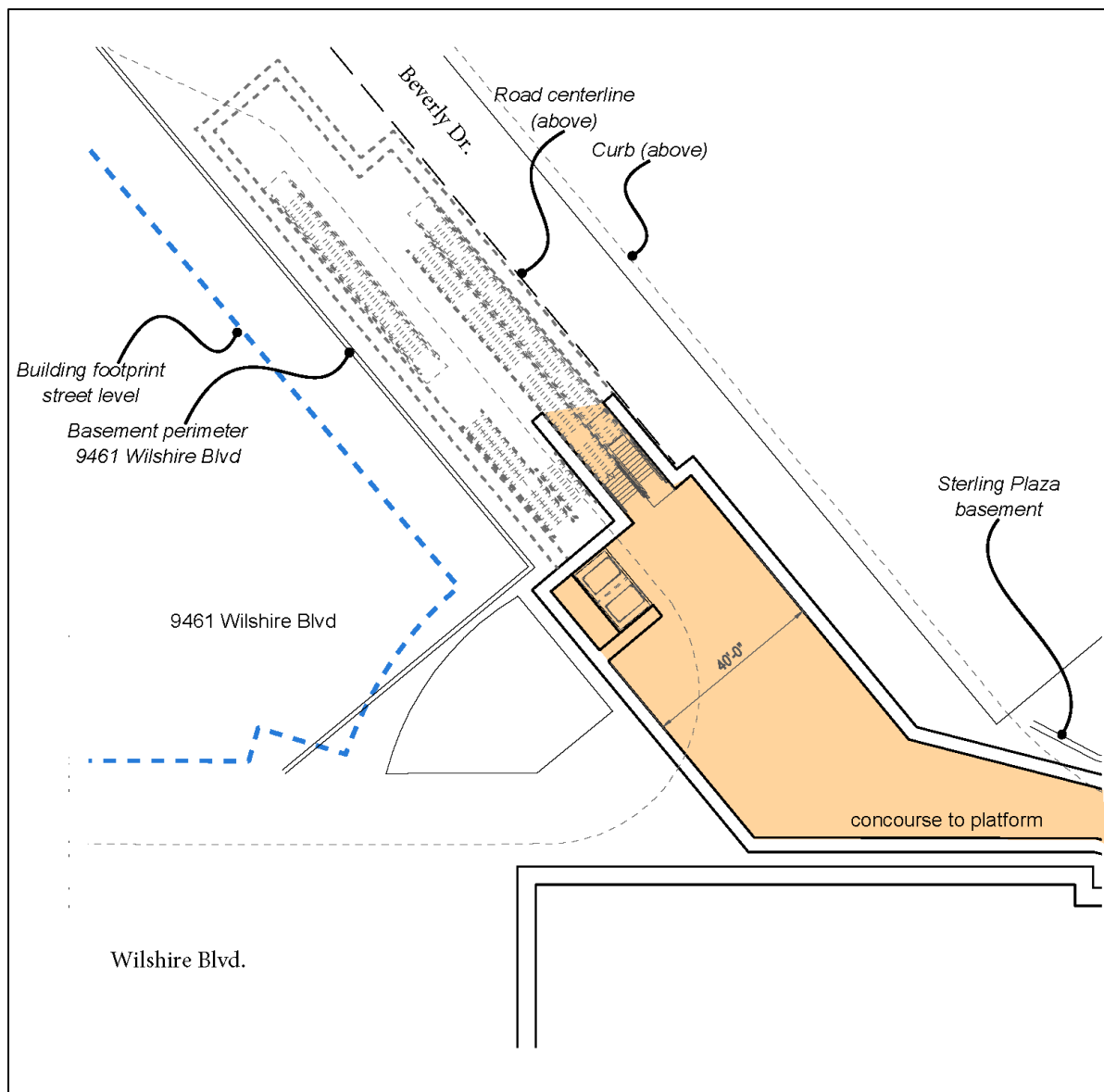


Figure 2-7 Project (Beverly Drive) Concourse Level Plan

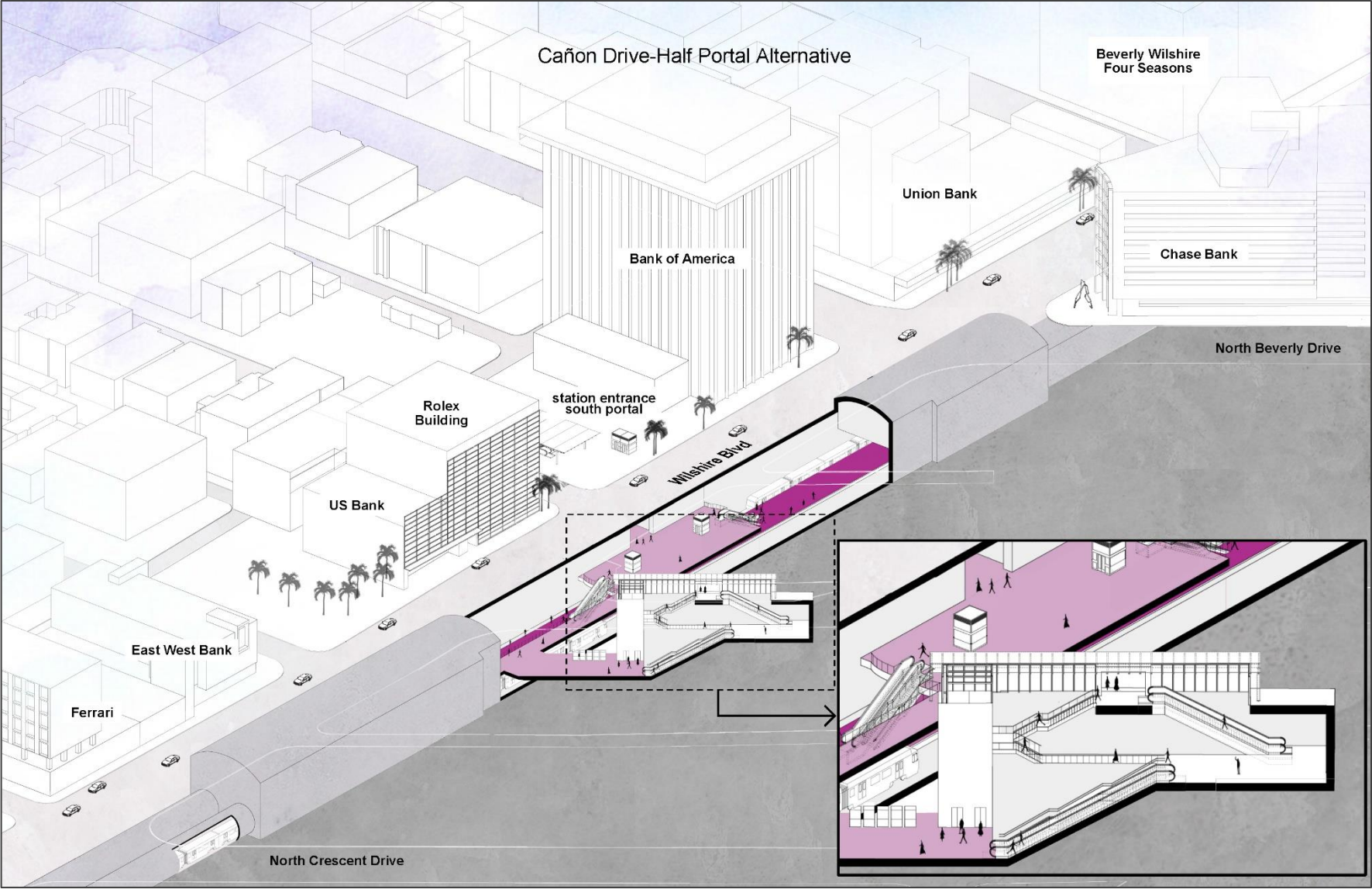


Figure 2-8 Cañon Drive-Half Portal Alternative Three-Dimensional Overview

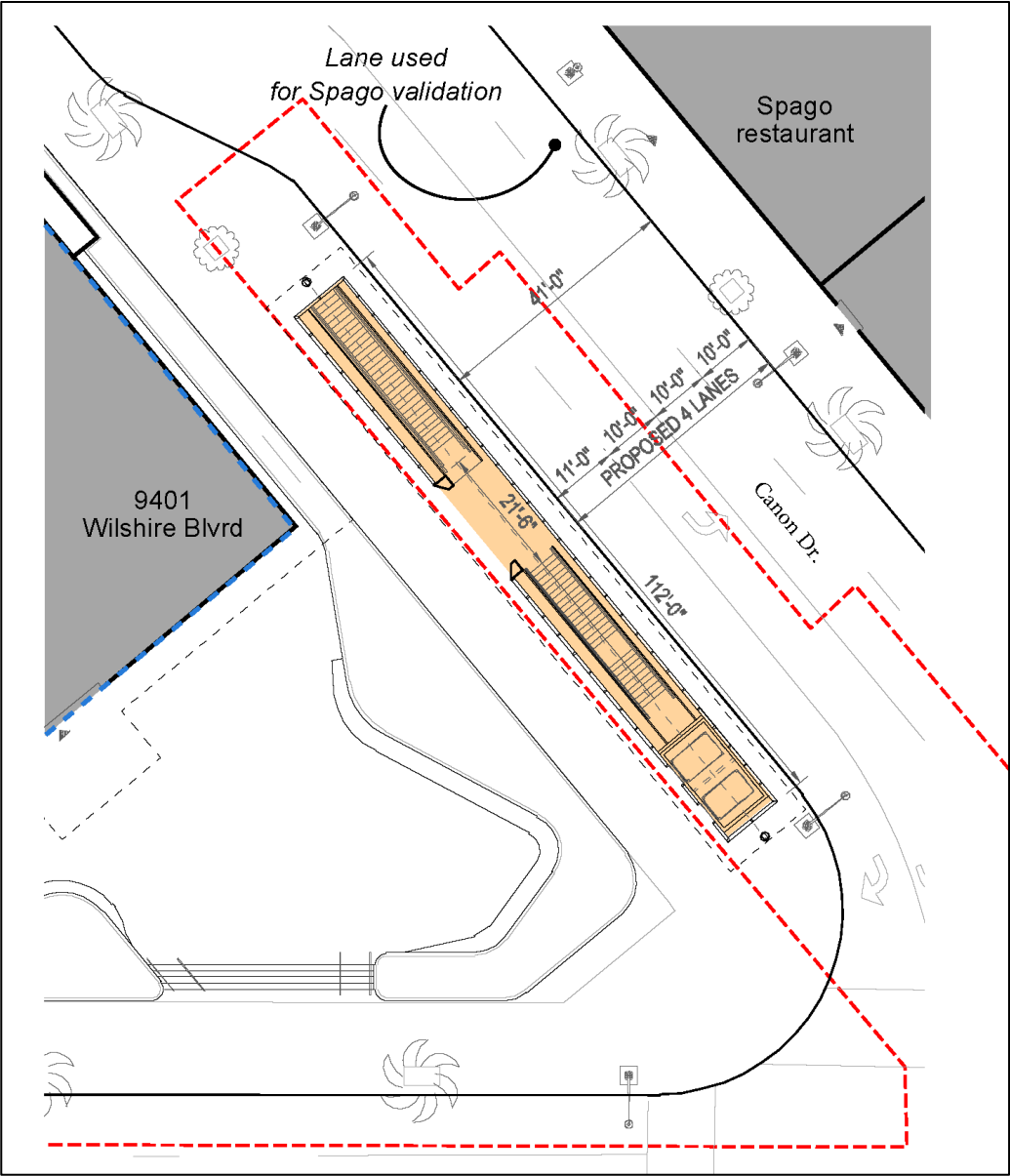


Figure 2-9 Cañon Drive-Half Portal Alternative Street Level Plan

The intermediate stairway landing would consist of a landing area serving as a transition between stairways. The walkway or concourse level shown on Figure 2-10 would consist of an open area with adequate space for passengers to ingress and egress from the stairway, escalator, and elevators. The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates and then to the Wilshire/Rodeo Station walkway previously analyzed in the Purple Line Extension EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed.

In addition, under the Cañon Drive-Half Portal Alternative, a traffic signal would be installed at the currently unsignalized intersection of Clifton Way and North Cañon Drive. Due to the close proximity of the intersection to this alternative, the installation of traffic signals would improve vehicle flows and pedestrian access.

2.5.4 Cañon Drive Staging Yard Alternative

The Cañon Drive Staging Yard Alternative would comprise a station portal entrance/exit in the existing Cañon Drive construction staging yard established for the Section 2 Purple Line Extension project and the public sidewalk, on the northeast corner of Cañon Drive and Wilshire Boulevard. The footprint of this alternative would be approximately 3,800 square feet.

Similar to the Project and the Cañon Drive-Half Portal Alternative, and as shown on Figure 2-11, the Cañon Drive Staging Yard Alternative would include three levels: the street level, intermediate stairway landing level, and concourse level.

As shown on Figure 2-12, the Cañon Drive Staging Yard Alternative street level would comprise the new station portal entrance/exit, including two elevators, one stairway, and one “up” escalator. Unlike the Project and the Cañon Drive-Half Portal Alternative, public restrooms (two separate stalls/rooms) would be provided on the street level with this alternative. A covered canopy would also be located above the portal on the street level, which would be enclosed by a translucent glass exterior. The portal would be 12 feet tall on the street level. The adjacent sidewalk would not be extended with this alternative and no permanent traffic lane closures would be required. In addition, removal of on-street parking spaces or street trees would not be required with this alternative. The Cañon Drive Staging Yard Alternative would also include an approximately 52-foot-tall ventilation shaft at the southeastern corner of the site. This tunnel ventilation shaft is required by Metro to be at least 40 feet from openings such as station entrances or portals. Due to the limited space available on the site this cannot be achieved by separating the shaft opening horizontally. Instead the opening is raised, resulting in a vertical shaft structure that extends 40 feet above the portal, which would be 12 feet tall, in order to satisfy the Metro requirement.

The intermediate stairway landing level would consist of a landing area serving as a transition between stairways. The walkway or concourse level shown on Figure 2-13 would consist of an open area with adequate space for passengers to enter and exit from the stairway, escalator, and elevators. The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates and then to the Wilshire/Rodeo Station walkway previously analyzed in the Purple Line Extension EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed, including public restrooms.

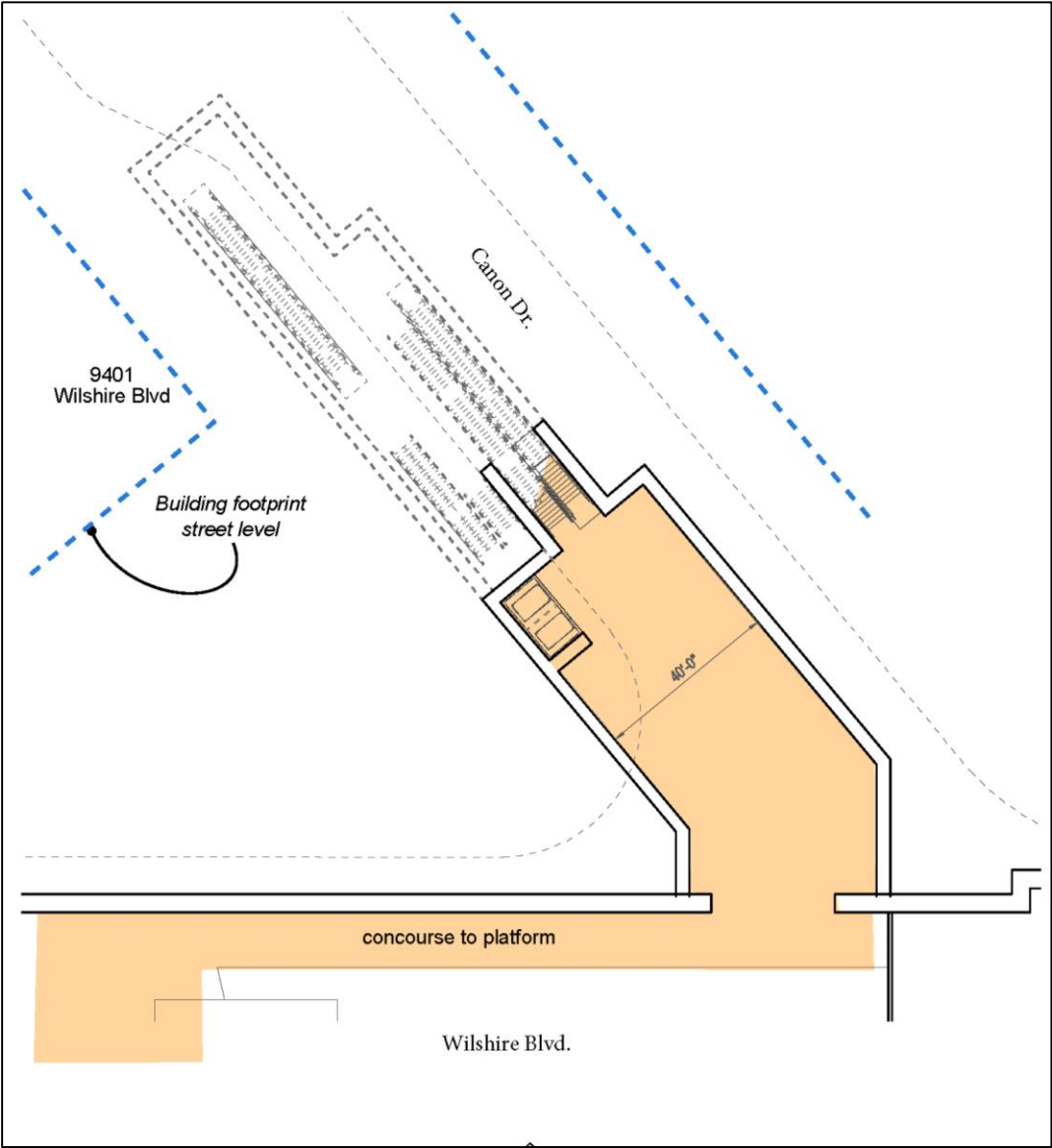


Figure 2-10 Cañon Drive-Half Portal Alternative Concourse Level Plan

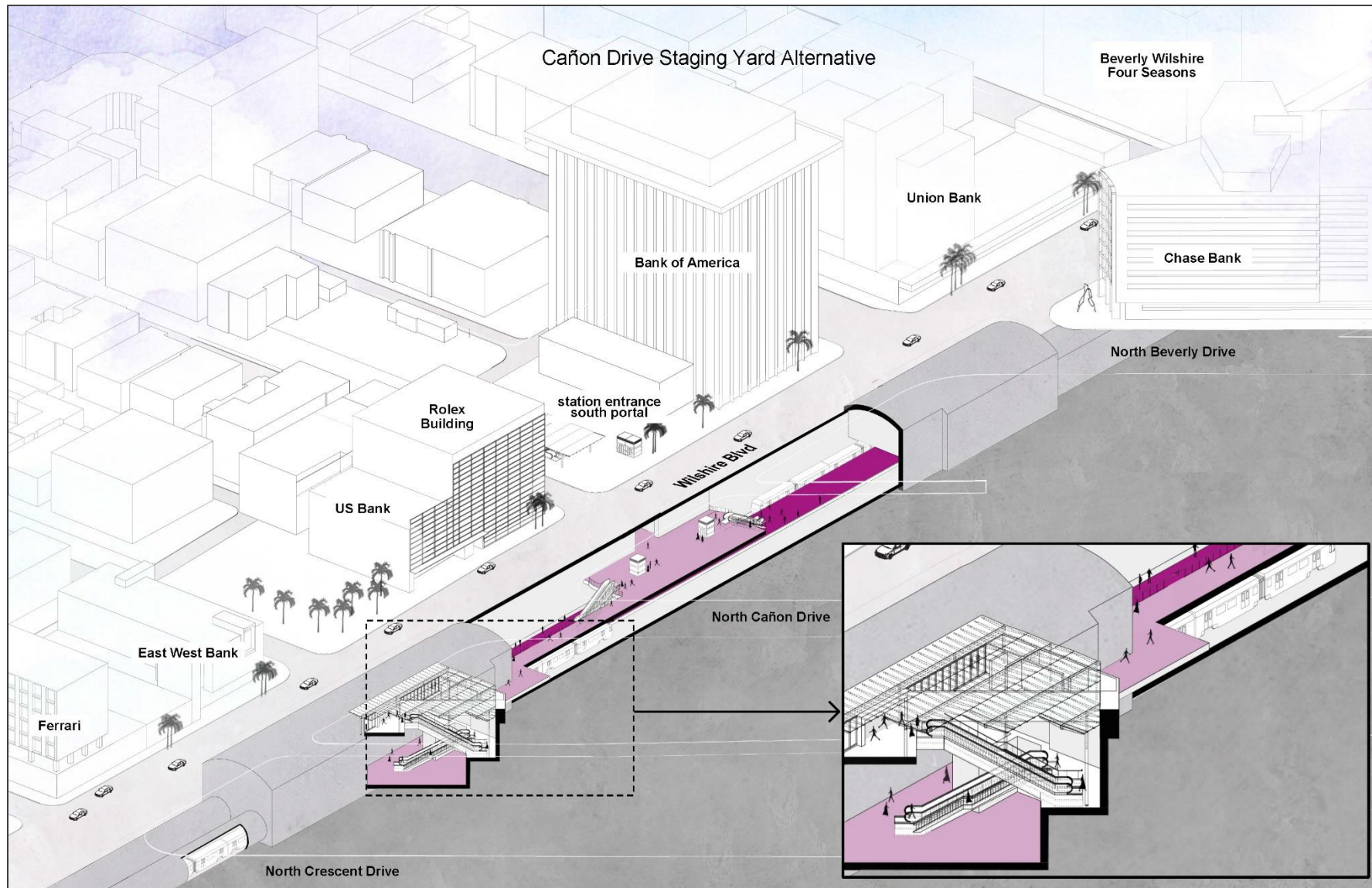


Figure 2-11 Cañon Drive Staging Yard Alternative Three-Dimensional Overview

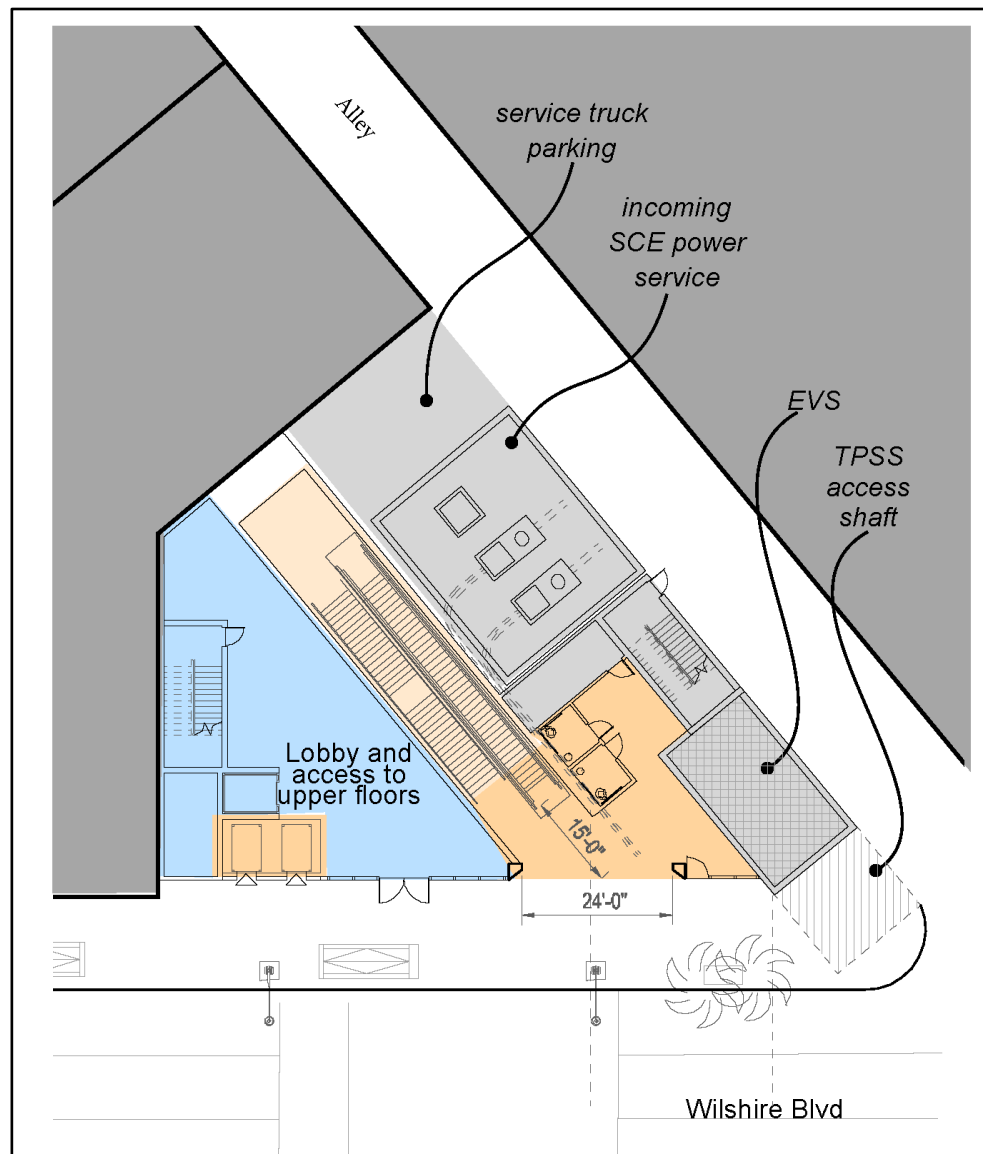


Figure 2-12 Cañon Drive Staging Yard Alternative Street Level Plan

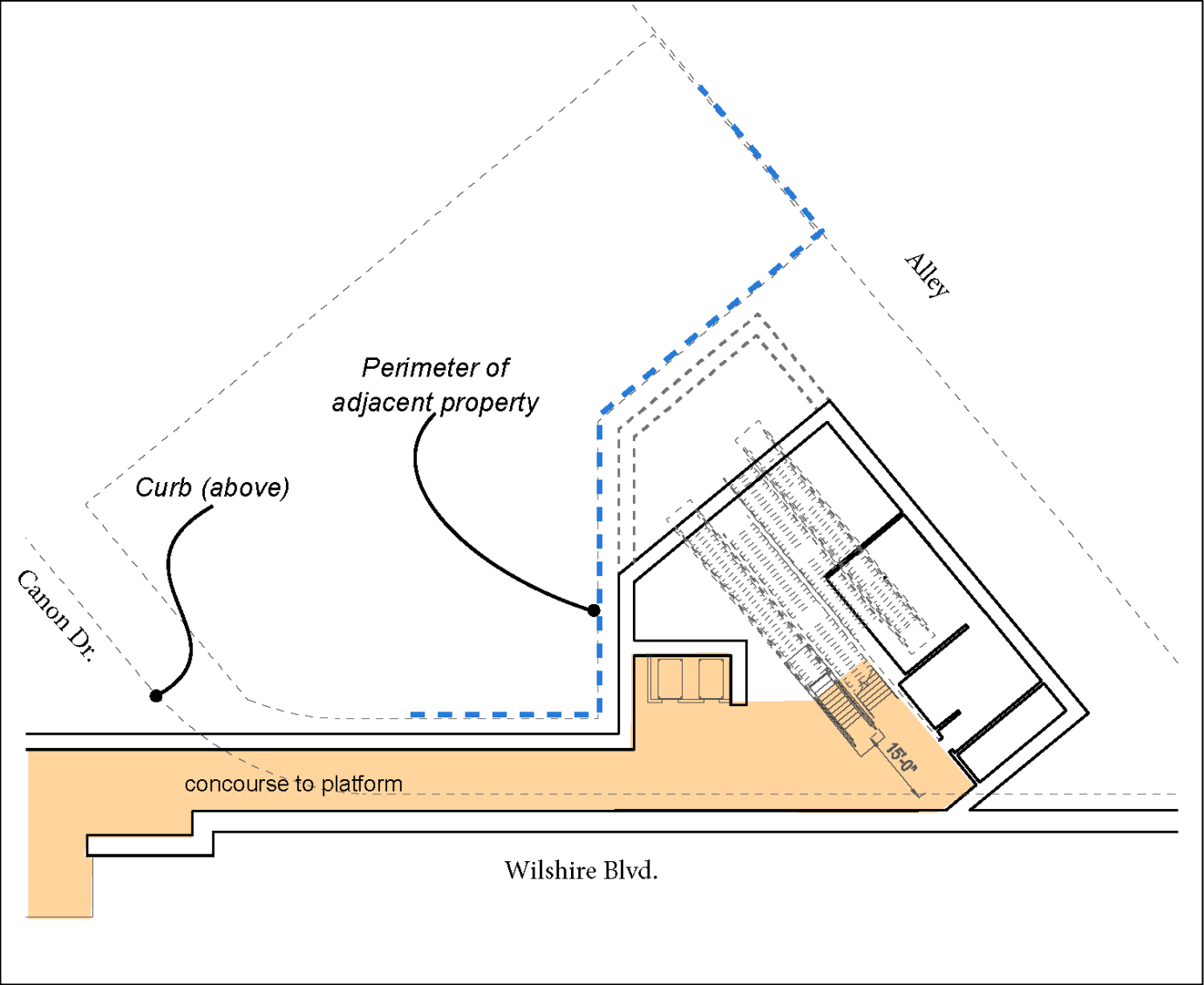


Figure 2-13 Cañon Drive Staging Yard Alternative Concourse Level

Additionally, this alternative could have a second escalator if a small below-ground portion of the adjacent parcel to the west (Assessor Parcel Number 4343-005-004) were utilized. This would result in additional land needing to be acquired by the City. Adding a second escalator would require approximately 900 square feet of this parcel, with all of it below-ground, therefore, not increasing the surface square footage of this alternative.

2.6 Construction Scenario

Discussed below is a potential approach to constructing the Project or one of the Project Alternatives at the Wilshire/Rodeo Station based on the constructability reports prepared for each alternative (Parsons and Brinkerhoff 2019). Possible construction means and methods employed during construction would be determined by the construction contractor and may differ from those outlined below. The construction process would include provisions for laydown and staging areas, haul routes and traffic control, utility relocations, connection with the existing station, and systems connections. During construction, various portions of Wilshire Boulevard may require closure. The construction process would follow applicable measures within the Memorandum of Agreement (MOA) currently in place between the City and Metro.

Construction of the Project and Cañon Drive-Half Portal Alternative would commence within the first quarter 2022 to the first quarter 2024 and would be completed within the third quarter 2025 to the third quarter 2026, depending on the construction contracting mechanism that is decided upon. Construction would last for approximately 2.5 to 3.5 years.

Construction of the Cañon Drive Staging Yard Alternative would commence approximately in the first quarter of 2024, and would be completed in the third quarter 2026, based on when the Wilshire/Rodeo Station is completed, and Metro's contractor makes the site available for construction of the new station portal. Construction would last approximately 2.5 years. However, if an alternate contracting mechanism is selected, construction could last up to approximately 3.5 years. Construction of this alternative would commence once the staging yard is available for use after certain Wilshire/Rodeo Station construction activities are completed.

Alternate contracting mechanisms may include procurement of the final design and construction through a design-build contract of inclusion of the Project or Project Alternatives design and construction into the Metro Section 2 contract.

2.6.1 Site Establishment

The Project (Beverly Drive)

Upon mobilization of the construction of the Project, design would be finalized and necessary permits secured. The delivery contractor would close the street on which the new station portal would be constructed and secure the site with temporary noise barrier fencing. Beverly Drive would be closed from Wilshire Boulevard to approximately Beverly Cañon Gardens. In addition, one lane of westbound Wilshire Boulevard would be closed during this phase of construction.

Temporary power would be provided by extending existing power utilities to the site, along with any other utilities the contractor requires such as water, communications, and sanitary sewer.

Should the existing station vent structure be in the way of the proposed elevator structure, temporary relocation of the vent structure would occur. The final design of the new station portal would determine the permanent relocation of the vent structure.

The delivery contractor would take possession of any secondary laydown/staging areas and may establish off-site offices and parking at these locations at that time. This assumes that construction would commence after the Section 2 project street work is completed at the Wilshire/Rodeo Station.

Cañon Drive-Half Portal Alternative

Upon mobilization of the construction of the Cañon Drive-Half Portal Alternative, design would be finalized and necessary permits secured. The delivery contractor would close the street on which the new station portal would be constructed and secure the site with temporary noise barrier fencing. Cañon Drive would be closed between Clifton Way and Wilshire Boulevard. In addition, one lane of westbound Wilshire Boulevard would be closed during this phase of construction.

Temporary power would be provided by extending existing power utilities to the site, along with any other utilities the contractor requires such as water, communications, and sanitary sewer.

Should the existing station vent structure be in the way of the proposed elevator structure, temporary relocation of the vent structure would occur. The final design of the new station portal would determine the permanent relocation of the vent structure.

The delivery contractor would take possession of any secondary laydown/staging areas and may establish off-site offices and parking at these locations at that time. This assumes that construction would commence after the Section 2 project street work is completed at the Wilshire/Rodeo Station.

Cañon Drive Staging Yard Alternative

Upon mobilization of the construction of the Cañon Drive Staging Yard Alternative, the design of the alternative would be finalized, and necessary permits secured. Although the staging yard site is already established and being used for Section 2 project construction, a certain amount of reconfiguration would be required to allow for the space to be used by the new station portal, and some construction staging may need to occur on the parcel adjacent west of the staging yard site. Additionally, establishing a temporary lane closure on Wilshire Boulevard and extending the temporary closure on North Cañon Drive that was put in place for the Wilshire/Rodeo Station in 2019 would be required to complete construction activities for this alternative.

2.6.2 Laydown and Staging

The Project (Beverly Drive)

For the Project, there are no off-street parking spaces located adjacent to the Project site that would be available for use as staging areas. As a result, Beverly Drive would be closed from Wilshire Boulevard to approximately Beverly Cañon Gardens to accommodate construction staging. Parking garages on both sides of North Beverly Drive just north of Beverly Gardens park would remain open. Temporary construction decking would also be installed to supplement

the available laydown and staging area. Even with the street closed, the contractor will need to deck significant portions of the excavation to provide the necessary space required for construction, with access into the excavation provided through openings in the decking.

Equipment and materials needed for construction including steel beams, cranes, and concrete pumps would be housed within the final designated construction laydown and staging area(s). The construction site of the Project would be enclosed by noise barrier fences on all sides.

Traffic movements within the construction site would be limited. Parking for a small number of construction vehicles would be provided, but no parking spaces would be provided for workers within the construction site area. Construction workers would be required to park elsewhere, such as nearby parking structures. Vehicular access to any business entrances fronting Beverly Drive would be removed during construction. Sidewalk access to these businesses would be maintained only during certain phases of the construction.

Cañon Drive-Half Portal Alternative

For the Cañon Drive-Half Portal Alternative, there is no off-street space adjacent to the site that is available to be used as a staging area for this alternative. As such, North Cañon Drive would require a full closure between Wilshire Boulevard to the south side of Clifton Way to provide for contractor laydown and construction. Clifton Way, as well as access to the parking garage on the west side of North Cañon Drive will remain open for the duration of construction. Even with the street closed, the contractor will need to deck significant portions of the excavation to provide the necessary space required for construction, with access into the excavation provided through openings in the decking. Cranes and concrete pumps would be staged alongside these openings. Equipment and materials needed for construction will be staged on site. The construction site for this alternative would be enclosed by noise barrier fences on all sides.

Similar to the construction of the Project, with the Cañon Drive-Half Portal Alternative no parking spaces would be provided for workers within the construction site area. Construction workers would be required to park elsewhere. Vehicular access to any business entrances fronting Cañon Drive would be removed during construction. Sidewalk access to these businesses would be maintained only during certain phases of the construction.

Cañon Drive Staging Yard Alternative

For the Cañon Drive Staging Yard Alternative construction, staging would occur on site. Excavation piling and decking would also be required. The current staging yard site is approximately 14,000 square feet in total area and is being used for the Section 2 project construction. If the north entrance/exit construction is awarded to the current Section 2 project contractor, then this would need to be sequenced around their existing work as the new station portal on this site would use a significant portion of this already constrained yard. If not the north entrance/exit construction is not awarded to the current Section 2 project contractor, then the work would have to wait until the contractor is finished with the site. A dedicated lane closure on Wilshire Boulevard is assumed. In addition, a full closure on Cañon Drive or use of the parcel adjacent and west of the staging yard site would offset a loss of space in the yard. The construction area would be enclosed by noise barrier fences on all sides.

Due to the constraints of the Cañon Drive Staging Yard Alternative site, traffic movements within the site would be limited. One lane of Wilshire Boulevard and the north sidewalk would be closed for the duration of construction to allow for deliveries and hauling away from the site

without entering the main portion of the yard due to lack of space to allow turning movements within the site. Parking for a small number of construction-related vehicles would be provided around the trailer area, however there is no space within the site for parking for the construction personnel. Off-site parking would be required, and arrangements would be made with existing parking facilities in the area.

2.6.3 Utilities

The Project (Beverly Drive)

For the Project, utility work would be required and would be one of the first construction activities to be performed. Both temporary and permanent power would be required. Temporary power would be required to run lighting, ventilation fans, and other construction related needs. Power would be supplied by Southern California Edison. Utilities that may be located in areas of planned excavation or piling activities would require relocation. There is the potential for additional water (fire hydrant) and street lighting utility relocations which may be added during final design.

The final scope of required utility relocations would be confirmed in detailed design. All relocated utilities would require maintenance during construction and may require restoring back to their original condition as part of street reinstatement to be completed at the finalization of the construction period, depending on utility owner requirements. A full utility investigation, including field potholing, would be completed to confirm if any other additional utilities are to be found at the site.

Cañon Drive-Half Portal Alternative

For both the Cañon Drive-Half Portal Alternative, utility work would be required and would be one of the first construction activities to be performed. Both temporary and permanent power would be required. Temporary power would be required to run lighting, ventilation fans, and other construction related needs. Power would be supplied by Southern California Edison. Utilities that may be located in areas of planned excavation or piling activities would require relocation. The Cañon Drive-Half Portal Alternative may also relocate gas and sewer lines, street lighting, and traffic signals.

The final scope of required utility relocations would be confirmed in detailed design. All relocated utilities would require maintenance during construction and may require restoring back to their original condition as part of street reinstatement to be completed at the finalization of the construction period, depending on utility owner requirements. A full utility investigation, including field potholing, would be completed to confirm if any other additional utilities are to be found at the site.

Cañon Drive Staging Yard Alternative

For the Cañon Drive Staging Yard Alternative, it is anticipated that utility relocations would be required. Utility relocations are required within the public ROW for the underground walkway between the new station portal and the concourse within the station; however, as the walkway is underneath the stair appendage which is already within the scope of work of the Section 2 project contractor, additional utility relocation work is expected to be minimal.

2.6.4 Piling and Excavation

The Project (Beverly Drive)

Under the Project soldier piles and temporary decking would be installed to provide excavation support. The decking would support required plant and machinery (including a crane), provide a laydown area, and allow for construction traffic to continue operating at the surface level where practicable. Excavation activities would follow piling and decking. Temporary power would be required for lighting, dewatering pumps, and to operate ventilation fans within the excavation area. Excavated materials would be transported from the site via the identified haul routes.

Any canopies to existing adjacent buildings on the west side of Beverly Drive may need to be removed for construction. Any removed building canopies would be reinstated following the completion of construction.

Cañon Drive-Half Portal Alternative

Under the Cañon Drive-Half Portal Alternative soldier piles and temporary decking would be installed to provide excavation support. The decking would support required plant and machinery (including a crane), provide a laydown area, and allow for construction traffic to continue operating at the surface level where practicable. Excavation activities would follow piling and decking. Temporary power would be required for lighting, dewatering pumps, and to operate ventilation fans within the excavation area. Excavated materials would be transported from the site via the identified haul routes.

Existing building canopies along Cañon Drive are not anticipated to be impacted by the construction of the Cañon Drive-Half Portal Alternative.

Cañon Drive Staging Yard Alternative

Under the Cañon Drive Staging Yard Alternative soldier piles and timber lagging are assumed for the excavation support, and the soldier piles would also support temporary decking required for the crane, laydown, and traffic where applicable. Decking is required due to the small space available in the yard.

Related to the walkway along the northern sidewalk and station box, the piles for the station north wall will conflict with the concourse level walkway structure and will need to be cut down below concourse level during excavation of the walkway. As these piles support the decking on which the traffic on Wilshire Boulevard runs during the construction of the station, the piles cannot be removed until after backfilling of the station. The support of excavation above the walkway will need to be designed to support the traffic on Wilshire Boulevard. A review of the design of the station structure would be required including the arch roof and the backfill (anticipated to be slurry) above the station in order to ensure the adequate structural capacity to accommodate the traffic loading from Wilshire Boulevard (directly alongside the excavation). Additionally, the construction of the exit stairway above the walkway will need to be re-sequenced to occur after the walkway is constructed.

Once piling activities are sufficiently advanced, decking can commence. The excavation is anticipated to be mostly decked to provide laydown space and for vehicle movements at street level within the site boundary for the contractor to use. The northern sidewalk and adjacent northern lane of Wilshire Boulevard will be decked but will remain closed during construction to

allow for access to the site for construction vehicles. Excavation down to grade will follow the piling and decking. Temporary power will be required for lighting, dewatering pumps, and to operate ventilation fans within the excavation.

2.6.5 Construction of the North Portal Entrance/Exit

The Project (Beverly Drive)

When the excavation has been completed to a sufficient depth for the Project, a grounding system and base slab would be constructed, and water proofing activities would occur. Once the base slab is constructed, the erection of the walls and roof of the new station portal would occur, and any required backfilling of below grade or disturbed areas would be completed.

During this stage of construction, the break through and connection to the existing Wilshire/Rodeo Station would also occur.

Cañon Drive-Half Portal Alternative

Construction of the entrance/exit related to the Cañon Drive-Half Portal Alternative would be the same as described above for the Project.

Cañon Drive Staging Yard Alternative

Construction of the entrance/exit related to the Cañon Drive Staging Yard Alternative would be the same as described above for the Project.

2.6.6 Connection to Existing Station

The Project (Beverly Drive)

For the Project, modifications inside the Wilshire/Rodeo Station would be required to link the new station portal to the existing station platform and concourse. A catwalk style walkway would be constructed along the north side of the station structure to link into the existing circulation area at concourse level. Additionally, alterations of the Wilshire/Rodeo Station design would be required to accommodate the walkway.

Due to the specific location of the Project on Beverly Drive at Wilshire Boulevard, this would require some reconfiguration of plant rooms on the western portion of the existing station, which would be occupied by mechanical equipment and associated utilities required for the operation of the project.

Depending on timing of these activities for the Project, the Metro Purple Line may be subject to potential temporary closure to allow for these activities to take place.

Cañon Drive-Half Portal Alternative

For the Cañon Drive-Half Portal Alternative, modifications inside the Wilshire/Rodeo Station would be required to link the new station portal to the existing station platform and concourse. A catwalk style walkway would be constructed along the north side of the station structure to link into the existing circulation area at concourse level. Additionally, alterations of the Wilshire/Rodeo Station design would be required to accommodate the walkway.

Depending on timing of these activities for the Cañon Drive-Half Portal Alternative, the Metro Purple Line may be subject to potential temporary closure to allow for these activities to take place.

Cañon Drive Staging Yard Alternative

For the Cañon Drive Staging Yard Alternative, modifications inside the Wilshire/Rodeo Station would be required to link the new station portal to the existing station platform and concourse. A catwalk style walkway would be constructed along the north side of the station structure to link into the existing circulation area at concourse level. Additionally, alterations of the Wilshire/Rodeo Station design would be required to accommodate the walkway.

Depending on timing of these activities for the Cañon Drive Staging Yard Alternative, the Metro Purple Line may be subject to potential temporary closure to allow for these activities to take place.

2.6.7 Architectural Finishes and Commissioning

The Project (Beverly Drive)

For the Project, architectural finishes, and mechanical and electrical elements including the elevator and escalator installations and entrance systems (such as passenger information systems) would be carried out upon the completion of the new station portal structure.

Metro would deliver the fare gates and ticket vending machines under Metro's Fare Collection and Gating system (FC&G). Such ticket vending machines and fare gate equipment are located in the concourse areas of all underground Metro stations.

Final commissioning and integration to the existing Purple Line system would need to be undertaken as a joint activity involving the Wilshire/Rodeo Station contractor, the delivery contractor for the new station portal, and Metro. Once commissioned, the new station portal would be open to the public and would be operated as part of Metro's larger system.

Cañon Drive-Half Portal Alternative

Completion of the architectural finishes and commissioning related to the Cañon Drive-Half Portal Alternative would be the same as described above for the Project.

Cañon Drive Staging Yard Alternative

Completion of the architectural finishes and commissioning related to the Cañon Drive Staging Yard Alternative would be the same as described above for the Project.

2.6.8 Haul Routes

The Project (Beverly Drive)

For the Project, the preliminary inbound haul route would travel east/northeast on Santa Monica Boulevard from the I-405 off-ramps, and then east on Wilshire Boulevard to the Project site. The outbound haul route would be similar with travel west from the Project site to Wilshire Boulevard, and then west/southwest on Santa Monica Boulevard to the I-405 on-ramps.

Additional haul routes specified for the construction of the Wilshire/Rodeo Station may also be utilized to limit disruptions to the community and road users. An alternative export haul route would travel east from the site on Wilshire Boulevard where it would turn south on South Robertson Boulevard, then west onto Pico Boulevard, then northwest onto Westwood Boulevard, and finally west onto Santa Monica Boulevard leading to the I-405 on-ramps.

The haul routes were selected to occur on major arterial streets to minimize noise, vibration, and other impacts to adjacent businesses, schools, major commercial developments, and residential neighborhoods. Consultation would be carried out and approval would be sought from the City of Los Angeles and Caltrans, if required, during the final design phase of the Project to ensure the overall suitability of the proposed haul route in terms of practicality and minimization of potential impacts. As such, the haul routes discussed above are conceptual and subject to change. However, the final haul routes would follow the applicable measures within the MOA in place between the City and Metro.

The primary access gate to the construction area for deliveries and hauling would be provided on Wilshire Boulevard and a secondary access gate would be provided on North Beverly Drive. The primary access gate on Wilshire Boulevard would be located adjacent to the northernmost traffic lane in the westbound direction of travel.

Cañon Drive-Half Portal Alternative

For the Cañon Drive-Half Portal Alternative, the preliminary inbound haul route would travel east/northeast on Santa Monica Boulevard from the I-405 off-ramps, and then east on Wilshire Boulevard to the Cañon Drive-Half Portal Alternative site. The outbound haul route would be similar with travel west from the Cañon Drive-Half Portal Alternative site to Wilshire Boulevard, and then west/southwest on Santa Monica Boulevard to the I-405 on-ramps. Additional haul routes specified for the construction of the Wilshire/Rodeo Station may also be utilized to limit disruptions to the community and road users. An alternative export haul route would travel east from the site on Wilshire Boulevard where it would turn south on South Robertson Boulevard, then west onto Pico Boulevard, then northwest onto Westwood Boulevard, and finally west onto Santa Monica Boulevard leading to the I-405 on-ramps.

The haul routes were selected to occur on major arterial streets to minimize noise, vibration, and other impacts to adjacent businesses, schools, major commercial developments, and residential neighborhoods. Consultation would be carried out and approval would be sought from the City of Los Angeles and Caltrans, if required, during the final design phase to ensure the overall suitability of the proposed haul route in terms of practicality and minimization of potential impacts. As such, the haul routes discussed above are conceptual and subject to change. However, the final haul routes would follow the applicable measures within the MOA in place between the City and Metro.

Deliveries and hauling are expected to occur from Wilshire Boulevard. While a gate is provided on North Cañon Drive, this is expected to be used as a secondary entry/exit. The primary access gate on Wilshire Boulevard would be located adjacent to the northernmost traffic lane in the westbound direction of travel.

Cañon Drive Staging Yard Alternative

For the Cañon Drive Staging Yard Staging Yard Alternative, the preliminary inbound haul route would travel east/northeast on Santa Monica Boulevard from the I-405 off-ramps, and then east

on Wilshire Boulevard to the Cañon Drive Staging Yard Alternative site. The outbound haul route would be similar with travel west from the Cañon Drive Staging Yard Alternative site to Wilshire Boulevard, and then west/southwest on Santa Monica Boulevard to the I-405 on-ramps. Additional haul routes specified for the construction of the Wilshire/Rodeo Station may also be utilized to limit disruptions to the community and road users. An alternative export haul route would travel east from the site on Wilshire Boulevard where it would turn south on South Robertson Boulevard, then west onto Pico Boulevard, then northwest onto Westwood Boulevard, and finally west onto Santa Monica Boulevard leading to the I-405 on-ramps.

The haul routes were selected to occur on major arterial streets to minimize noise, vibration, and other impacts to adjacent businesses, schools, major commercial developments, and residential neighborhoods. Consultation would be carried out and approval would be sought from the City of Los Angeles and Caltrans, if required, during the final design phase to ensure the overall suitability of the proposed haul route in terms of practicality and minimization of potential impacts. As such, the haul routes discussed above are conceptual and subject to change. However, the final haul routes would follow the applicable measures within the MOA in place between the City and Metro.

Deliveries and hauling are expected to occur from Wilshire Boulevard. While a gate is provided on North Cañon Drive, this is expected to be used as a secondary entry/exit. The primary access gate on Wilshire Boulevard would be located adjacent to the northernmost traffic lane in the westbound direction of travel. The access gate provided on North Cañon Drive can only function as a secondary entry/exit due to space constraints within the yard.

2.6.9 Road Closures and Traffic Control

The Project (Beverly Drive)

For the Project, North Beverly Drive would be closed for the duration of the construction between Wilshire Boulevard and approximately Beverly Cañon Gardens. To facilitate traffic movements in the cul-de-sac formed north of the site boundary, a turning head would be formed between the crosswalk and the north site boundary. A northern entrance would also be required at the north end of the construction site. This would form a secondary entrance, however the majority of the traffic movements to and from the site are anticipated to be via Wilshire Boulevard.

One lane of Wilshire Boulevard and the northern sidewalk would be required to be closed for the duration of construction for loading/off loading and due to the closure of North Beverly Drive, and Wilshire Boulevard would be restriped and re-signaled to eliminate turns from Wilshire Boulevard onto North Beverly Drive (construction traffic excepted). South Beverly Drive will also require restriping and re-signaling as traffic would be required to either turn left or right with no ability to travel north. This would also apply to construction traffic; truck deliveries to the site and exiting the site would occur traveling east on Wilshire Boulevard.

As North Beverly Drive and portions of Wilshire Boulevard would be closed during the duration of the Project, peak hour traffic restrictions are not applicable.

During pile installation and installation and removal of the decking, additional space would be required and the site boundary would need to be temporarily extended, which would require taking a second lane of westbound Wilshire Boulevard; five lanes would remain in operation allowing for two westbound and eastbound plus the westbound left turn pocket onto South

Beverly Drive. Extending the site boundary for piling would also mean the east sidewalk of Beverly Drive would be closed temporarily. Work would proceed over longer shift durations and behind a K-Rail barrier, and would follow the work hours stated in the MOA between the City and Metro.

Pedestrian routes between Beverly Drive and Wilshire Boulevard would require detouring via the next block. After the piling and associated activities, traffic control and site boundary could return to the previous state and the closure of a second lane of westbound Wilshire Boulevard would no longer be required.

It is likely that eight metered street parking spaces (four on each side of North Beverly Drive) and the existing shuttle zone adjacent to the Montage Hotel would be temporarily removed during construction.

Bus stops located on Wilshire Boulevard were relocated away from the construction zone as part of the Section 2 project. The relocation of any bus stops would be determined in consultation with relevant bus service providers and the City of Beverly Hills.

Cañon Drive-Half Portal Alternative

Currently, due to the construction of the Wilshire/Rodeo Station, a wall has been installed on the north side of Wilshire Boulevard at Cañon Drive, forming a cul-de-sac of Cañon Drive at this location. For the Cañon Drive-Half Portal Alternative, North Cañon Drive would be closed for the duration of the construction between the Clifton Way intersection and Wilshire Boulevard. A northern entrance would be required at the north end of the construction site. This would form a secondary entrance, as the majority of the traffic movements to and from the site are anticipated to be via Wilshire Boulevard.

One lane of Wilshire Boulevard would be required to be closed for the duration of construction for loading/off loading and due to the closure of North Cañon Drive, Wilshire Boulevard would be restriped and re-signaled to eliminate turns from Wilshire Boulevard onto North Cañon Drive (construction traffic excepted). As North Cañon Drive and portions of Wilshire Boulevard would be closed for the duration of the project, peak hour traffic restrictions are not applicable.

During pile installation and installation and removal of the decking, additional space would be required, and the site boundary would need to be temporarily extended, which would require temporarily closing a second lane of Wilshire Boulevard reducing westbound traffic to one lane. This work may be performed over a series of weekends and/or nighttime closures. After the piling and associated activities, traffic control and site boundary could return to the previous state and the closure of a second lane of westbound Wilshire Boulevard would no longer be required.

It is likely that ten metered street parking spaces (three on the west side and seven on the east side of North Cañon Drive) would be temporarily removed during construction. Currently, eight parking spaces on the east side of Cañon Drive are used as valet during certain hours.

Bus stops located on Wilshire Boulevard were relocated away from the construction zone as part of the Section 2 project. The relocation of any bus stops would be determined in consultation with relevant bus service providers and the City of Beverly Hills.

Cañon Drive Staging Yard Alternative

For the Cañon Drive Staging Yard Alternative, one lane of Wilshire Boulevard would be required to be closed for loading/offloading as the entrance itself takes up available space in the yard and the remaining space is insufficient to allow for deliveries and unloading using the current arrangement in place for the station construction. Additional space would be required, and the site boundary would need to be extended to the north of the currently planned barrier on North Cañon Drive. Installation of the southern pile line would require temporary closure of a second lane of Wilshire Boulevard reducing westbound traffic to one lane. This work may be performed during nighttime and weekend closures. After the piling (and associated) activities, traffic control and site boundary could return to the previous state and the closure of a second lane of westbound Wilshire Boulevard would no longer be required. No street parking spaces would be impacted by the construction of this alternative.

Bus stops located on Wilshire Boulevard were relocated away from the construction zone as part of the Section 2 project. The relocation of any bus stops would be determined in consultation with relevant bus service providers and the City of Beverly Hills.

2.6.10 Work Hours

For the Project and Project Alternatives, construction activities would be required to occur within the work hour table in the MOA between the City of Beverly Hills and Metro, which generally includes Monday to Friday, 8:00 a.m. through 6:00 p.m. However, some activities such as piling, decking, excavation, and major concrete pouring activities would require work to be performed outside of these hours and on weekends, in which case an after-hours work permit would be required to extend construction beyond this period. Noise limits are also anticipated to be strictly controlled by the City of Beverly Hills due to the proximity of the work to major businesses.

2.6.11 Construction Best Management Practices

An appropriate combination of monitoring and resource impact avoidance would be employed during all phases of the Project and Project Alternatives, including implementation of the following Best Management Practices (BMPs) as feasible. In addition, all applicable BMPs outlined in the MOA between the City of Beverly Hills and Metro would be implemented as feasible.

The Project and Project Alternatives would implement Rule 403 dust control measures required by the South Coast Air Quality Management District, which would include the following:

- Water shall be applied to exposed surfaces at least two times per day to prevent generation of dust plumes.
- The construction contractor shall utilize at least one of the following measures at each vehicle egress from the construction site to a paved public road:
 - a. Install a pad consisting of washed gravel maintained in clean condition to a depth of at least six inches and extending at least 30 feet wide and at least 50 feet long;
 - b. Utilize a wheel shaker/wheel spreading device consisting of raised dividers at least 24 feet long and 10 feet wide to remove bulk material from tires and vehicle undercarriages; or

- c. Install a wheel washing system to remove bulk material from tires and vehicle undercarriages.
- All haul trucks hauling soil, sand, and other loose materials shall be covered (e.g., with tarps or other enclosures that would reduce fugitive dust emissions).
- Construction activity on exposed or unpaved dirt surfaces shall be suspended when wind speed exceeds 25 miles per hour.
- Ground cover in disturbed areas shall be replaced in a timely fashion when work is completed in the area.
- A community liaison shall be identified concerning on-site construction activity including resolution of issues related to PM10 (particulate matter 10 microns in diameter or less) generation.
- Soil stabilizers shall be applied according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Streets shall be swept at the end of the day if visible soil is carried onto adjacent public paved roads. If feasible, water sweepers with reclaimed water shall be used.

The construction contractor would develop and implement an erosion control plan and Storm Water Pollution Prevention Plan for construction activities. Erosion control and grading plans may include, but would not be limited to, the following:

- Minimizing the extent of disturbed areas and duration of exposure;
- Stabilizing and protecting disturbed areas;
- Keeping runoff velocities low; and
- Retaining sediment within the construction area.
- Construction erosion control Best Management Practices may include the following:
 - a. Temporary desilting basins;
 - b. Silt fences;
 - c. Gravel bag barriers;
 - d. Temporary soil stabilization with mattresses and mulching;
 - e. Temporary drainage inlet protection; and
 - f. Diversion dikes and interceptor swales.

The project would comply with the Regional Water Quality Control Board's National Pollutant Discharge Elimination System.

2.7 Activities to be Completed by Metro

The following activities would be required to be completed by Metro in order to facilitate completion of the new station portal:

2.7.1 Knockout Panel Connection

The knockout panel would be removed and/or relocated to create a hole between the new station portal and the Wilshire/Rodeo Station to allow passageway between the two structures.

A knockout panel is already included in the design of the Wilshire/Rodeo Station to be completed by Metro. Conduits for the various systems that must pass between the existing station and the new station portal must also pass through the structures at this location.

2.7.2 Identification and Removal of Existing Piles

The Wilshire/Rodeo Station would be excavated using a soldier pile and lagging support excavation method. At the completion of station work and backfilling, these soldier piles would be cut off below ground level and the remainder left in the ground, directly under Wilshire Boulevard. The final in situ location of these piles are likely to conflict with the new station portal and may require removal.

2.7.3 Wilshire/Rodeo Station Catwalk Walkway

A catwalk style walkway would be provided from the knock out panel to the Wilshire/Rodeo Station concourse. The Wilshire/Rodeo Station design would be revised to incorporate the layout and loading from this walkway. The loading from the catwalk would need to be accounted for in the structure as would any cast in items required for the support structure. Additionally, any fire/life/safety implications would also need to be reviewed.

2.7.4 Changes to the UPE Room to Facilitate Entrance

Modifications to the Under Platform Exhaust (UPE) system room adjacent to the knockout panel may be required to allow for the connection of the new station portal and the Wilshire/Rodeo Station.

2.7.5 Changes to Purple Line Section 2 Systems

Station systems, including but not limited to communications (telephone, passenger information systems, emergency communications, CCTV), fire sprinklers, lighting power, fare gate systems, and power would likely need to be routed from the Wilshire/Rodeo Station into the new station portal.

2.8 Intended Uses of This EIR

An EIR is a public document used by a public agency to analyze the significant environmental effects of a proposed project, to identify alternatives, and to disclose possible ways to reduce or avoid environmental damage (CEQA Guidelines Section 15121). As an informational document, an EIR does not advocate for or against approving a project. The main purpose of an EIR is to inform governmental decision makers and the public about potential environmental impacts of the project. This EIR will be used by the City, as the lead agency under CEQA, in making decisions with regard to adoption of the Project or a Project Alternative, the subsequent construction and operation of the Project or Project Alternative, and the related approvals described herein.

2.9 Required Permits and Approvals

The City of Beverly Hills is the project lead agency pursuant to CEQA Guidelines Section 15367. Numerous approvals and/or permits would be required to implement the project. The environmental documentation for the project would be used to facilitate compliance with federal and state laws and the granting of permits by various state and local agencies having jurisdiction over one or more aspects of the project. These approvals and permits may include but may not be limited to, the following:

State of California, Division of Occupational Safety and Health

- Excavations, Trenches, Construction and Demolition and the Underground Use of Diesel Engines in Work in Mines and Tunnels Permit

State of California, Division of Transportation (Caltrans)

- Permits for haul routes

City of Los Angeles

- Permits for disposal of materials and haul routes

City of Beverly Hills

- Traffic Management Plan (TMP)
- Building Permit
- Grading Permit
- Dewatering Permit

2.10 Related Projects

Table 2-1 provides the list of active related projects as provided by the City of Beverly Hills. This list was last revised in March 2020 and is subject to change based on new developments that may arise. Refer to Appendix B which provides further details of each related project.

In addition to the projects listed in Table 1, the Westside Purple Line Extension – Section 2 is identified as an active related project. Construction activities for Section 2 began in May 2019, which included sewer and water line replacement and relocation on Wilshire Boulevard between Beverly Drive and Crescent Drive. Beginning September 9, 2019, North Cañon Drive at Wilshire Boulevard was closed for approximately 24 months until September 2021 in efforts to mitigate traffic and noise during major construction of the planned Wilshire/Rodeo Station.

Table 2-1 List of Related Projects

Address	Description	Existing Use	Proposed Use
100 N. Crescent Dr.	Zone Text Amendment, General Plan Amendment, and Planned Development Permit request to create a new Entertainment Office Planned Development Overlay Zone to allow renovations to existing building (add two stories). Requires Environmental Impact Report.	2,550 SF Screening Room, 103,535 SF Commercial Office	Commercial Office: 4,330 SF of restaurant, 2,489 SF of screening room, 154,336 SF of office; 465 parking spaces
250 N. Crescent Dr.	Development Plan Review, Density Bonus Permit, and Tentative Map request to construct a new 4-story, 8-unit condominium building with 1 very low income affordable unit, and development incentives for density, height, reduced modulation, reduced side setback, and reduced parking requirements.	Vacant Lot	Multi-Family Residential: 7 Condo Units, 1 Affordable Rental Unit, 12,400 SF residential uses; 14 parking spaces
55 N. La Cienega Blvd.	Overlay Zone for Mixed-Use Hotel Project, including hotel, restaurant, and market uses.	13,500 SF Restaurant (The Stinking Rose)	200 Hotel Rooms; ancillary restaurant (3,346 SF), market/eatery (9,566 SF) and retail uses (656 SF) and assembly use
154-168 N. La Peer Dr.	Tentative Tract Map, Development Plan Review, and R-4 Permit request to allow construction of a new condominium building.	Multi-Family Residential (3 buildings) - 6 units	Multi-Family Residential: 16 Condo Units, 39,084 SF residential uses; 59 parking spaces
140 S. Lasky Drive	Development Plan Review, Conditional Use Permit, Open Air Dining, and Extended Hours Permit for new 4-story hotel with 66 rooms, restaurant, and rooftop uses.	3-story hotel - 14,625 SF, 44 rooms	4-story hotel - 36,718-SF with 66 rooms, 3,028 SF restaurant (1,628 SF indoor, and 1,400 SF outdoor), and rooftop uses (pool), and 3 levels of subterranean parking
457 N. Oakhurst Dr.	Tentative Tract Map, R-4 Permit, and Variance request for a new condominium building, and variances for setbacks, parking, and building height	2-story, 2-unit building	8-unit, 7-story condominium building

Table 2-1 List of Related Projects

Address	Description	Existing Use	Proposed Use
9212 Olympic Blvd.	Etco Homes: Conditional Use Permit and Minor Accommodation request to allow a new 3-story office building in the C-3T-2 Zone.	Surface Parking Lot associated with adjacent Auto Dealer (not a part)	Commercial Office with Retail/Restaurant: 6,900 SF of Retail/Restaurant (with a max. of 1,000 SF of bar and dining area), 13,344 SF of Commercial Office; 58 parking spaces
9120 Olympic Blvd.	Harkem Hillel: Conditional Use Permit to allow the renovation and expansion of an educational facility.	54,262 SF (educational facility)	Total new floor area: 80,719 SF (net increase of 26,457 SF)
9230 Olympic Blvd.	Zone Text Amendment, Conditional Use Permit to allow use of semi- automated parking for required parking and a CUP for increased height/density in the C3T2 Zone.	Approx. 7,573 SF Commercial (Office)	17,989 SF Commercial: 1,326 SF Restaurant and 16,663 SF of Office
425 N. Palm Dr.	Cloud Condos: Zone Text Amendment, Development Plan Review, and R-4 Permit request to allow a new 5-story, 20-unit condominium building. Current project to change design of the building, and addition of 6,000 SF (10% of 55,000 SF); tract map for condominiums.	Multi-Family Residential (3 buildings) - 18 Units	Multi-Family Residential: 20 Multi-Family Residential Units - Approx. 64,000 Total; 64 parking spaces
340 S. Rexford Dr.	Vesting Tentative Parcel Map, Development Plan Review, and R-4 Permit for a new 3-Unit Condo Building	Vacant Lot	3-Unit Condominium Building
370 N. Rodeo Dr.	Cartier: Development Plan Review and In-Lieu Parking request for a new 3-story commercial building.	9,587 SF Commercial (Retail)	Commercial (Retail): 15,250 SF of Retail Use (net increase of 5,663 SF)
400-408 N. Rodeo Dr.	Chanel: Development Plan Review & Conditional Use Permit for construction of new retail building with rooftop uses and mechanical lift parking.	28,128 SF Commercial (Retail) (12,864 SF at 400 Rodeo and 15,264 SF at 408 Rodeo)	29,767 SF Commercial (Retail)

Table 2-1 List of Related Projects

Address	Description	Existing Use	Proposed Use
9220 N. Santa Monica Blvd.	Beverly Hills Creative Offices Project: a specific plan proposal for 11 creative office buildings and underground parking on a 2.2 acre parcel located on N. Santa Monica Boulevard.	Vacant	11 Office buildings totaling 114,202 SF, and an underground parking garage with 133,900 SF and 316 parking spaces
9900-9908 S. Santa Monica Blvd.	Zone Change request to change from commercial to mixed use zoning, including changes to height, FAR, and setbacks.	Vacant Lot (Friar's Club)	Mixed-Use Multi-Family and Commercial: 13,616 SF of Commercial, 27 Condo Units
8633 Wilshire Blvd.	Development Plan Review for new three-story commercial building with subterranean parking and rooftop uses	Commercial building (restaurant)	25,562 SF Commercial Office; 76 parking spaces
9000 Wilshire Blvd.	Development Plan Review request for a new 3-story office building with rooftop lunchroom.	4,820 SF Commercial (Retail) and Surface Parking Lot	Commercial Office: 31,702 SF Commercial Office; 91 parking spaces
9111 Wilshire Blvd.	Gibraltar Square: Conditional Use Permit and Historic Incentive Permit to convert a bank/office building to a hotel with ancillary uses, and to deviate from certain development standards (parking and loading).	112,400 SF	No change to floor area. Change in use from Office Building (710) to Hotel (310)
9145 Wilshire Blvd.	Conditional Use Permit, Historic Incentive Permit, & Extended Hours Permit for a religious institution and pre-school	8,269 SF Commercial (Bank/Office - now vacant); 15 parking spaces	8,269 SF religious institution; 16 parking spaces
9200 Wilshire Blvd.	Zone Text Amendment and Planned Development Permit to amend the approved Planned Development Permit and Overlay Zone to allow a 6-story mixed-use project with 90 residential units and ground floor commercial uses.	Vacant Lot	Mixed-Use Multi-family and Commercial: 54 Multi- Family Residential Units, 14,000 SF Commercial; 321 parking spaces

Table 2-1 List of Related Projects

Address	Description	Existing Use	Proposed Use
9900 Wilshire Blvd.	One Beverly Hills: General Plan Amendment, Specific Plan Designation, Specific Plan, Vesting Tentative Tract Map, Development Plan Review, and Development Agreement request to allow two new Mixed-Use Condominium buildings with commercial uses, and luxury public gardens.	Vacant (Former Robinson's May Site)	Mixed-Use (Condominium and Commercial): 193 Condo Units with 134 Rooms, 16,057 SF of Restaurant/Retail, 7,942 SF of Ballrooms/Conference Rooms, 18,826 SF of Ancillary Uses, 1,140 parking spaces

SOURCE: City of Beverly Hills, March 2020
Note: SF= square feet

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3. ENVIRONMENTAL IMPACT ANALYSIS

Environmental Impact Analysis Overview

This chapter discusses the possible environmental effects of the Project (Beverly Drive) and Project Alternatives for the specific issue areas that were identified through the scoping process as having the potential to experience significant effects. “Significant effect” is defined by the CEQA Guidelines Section 15382 as:

“...a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant.”

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, which is followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the “significance thresholds,” which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the Project and Project Alternatives, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is separately listed in bold text with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

Significant and Unavoidable: *An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per §15093 of the CEQA Guidelines.*

Less than Significant with Mitigation Incorporated: *An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under §15091 of the CEQA Guidelines.*

Less than Significant: *An impact that does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.*

No Impact: *The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.*

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the Project and Project Alternatives in conjunction with other planned and pending developments listed in Section 2.10 (Related Projects). The Executive Summary of this

EIR summarizes all impacts and mitigation measures that apply to the Project and Project Alternatives.

This EIR analyzes the Project, Cañon Drive Alternative, and the Cañon Drive Staging Yard Alternative at the same level of detail throughout each environmental analysis section. In addition, analysis of the No Project Alternative is also analyzed in each section of the EIR. The environmental analysis sections included in Chapter 3 are:

- Aesthetics & Visual Quality (Section 3.1)
- Air Quality (Section 3.2)
- Biological Resources (Section 3.3)
- Cultural Resources (Section 3.4)
- Energy (Section 3.5)
- Geology, Soils, and Mineral Resources (Section 3.6)
- Greenhouse Gas Emissions (Section 3.7)
- Hazards and Hazardous Materials (Section 3.8)
- Hydrology/Water Quality (Section 3.9)
- Noise (Section 3.10)
- Public Services (Section 3.11)
- Transportation (Section 3.12)
- Tribal Cultural Resources (Section 3.13)
- Utilities /Service Systems (Section 3.14)

As discussed in Chapter 1 (Introduction), the following environmental issue areas were determined to have less than significant impacts, and are therefore included in Chapter 4 (Other CEQA Required Discussions) with a brief analysis:

- Agricultural / Forestry Resources
- Land Use / Planning
- Population / Housing
- Recreation
- Wildfire

3.1 Aesthetics & Visual Quality

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to aesthetics and visual quality. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. The section describes the affected environment and analyzes the environmental impacts of the Project and Project Alternatives and, if applicable, provides mitigation measures.

The character of the existing visual environment was documented through field reconnaissance, photographic records, and aerial photograph interpretation. The description of the visual environment of the Project and Project Alternatives sites provides a baseline against which the effects of the proposed changes on key views are assessed. Descriptors used to assess the visual environment include visual character, visual quality, visual resources, viewer groups and their sensitivity, and view duration. The analysis describes the potential aesthetic effects of the Project and Project Alternatives on the existing landscape and built environment, focusing on the compatibility of the proposed changes with existing conditions and its potential effects on visual resources. Several visual simulations have been prepared and are presented in this section. The visual simulations presented illustrate the conceptual design of the Project and Project Alternatives and are not necessarily representative of the final design process.

3.1.1 Regulatory Setting

Federal

There are no federal regulations that are applicable to the Project and Project Alternatives related to aesthetics or visual quality.

State

California Environmental Quality Act

The California Environmental Quality Act (CEQA) (Public Resources Code, Div. 13, Section 21000–21177) and the State CEQA Guidelines (14 CCR 15000–15387 with appendices) require an evaluation of scenic resources in consideration of effects to the quality of the environment. The evaluation considers site-specific history, context, and area sensitivity.

Local

Policies on visual resources in the City's General Plan and Municipal Code focus on maintaining and protecting significant visual and aesthetic resources that define the City.

City of Beverly Hills General Plan – Open Space Element

The City of Beverly Hills General Plan, amended on January 12, 2010, provides a comprehensive framework that guides the City's development through 2025. The Open Space Element guides the conservation of open space; biological, water, visual resources; and air quality in the City. It also addresses the provision of parkland and recreation programs. The following goals and policies presented in the Open Space Element are applicable to aesthetics:

Goal OS 6: Visual Resource Preservation

Maintenance and protection of significant visual resources and aesthetics that define the City.

OS 6.1 Protection of Scenic Views. Seek to protect scenic views and vistas from public places including City landmarks, hillside vistas, and urban views of the City. (Imp. 2.1)

OS 6.3 Landscaping. Require that new development be located and designed to visually complement the urban setting by providing accessible, landscaped entries, courtyards, and plazas. (Imp. 2.1)

OS 6.4 Minimize Removal of Existing Resources. Require new commercial, office, and residential development to minimize the removal of mature trees and other significant visual resources present on the site. (Imp. 2.1, 2.2., 3.8)

OS 6.5 Standards for New Development. Seek to ensure that new development does not adversely impact the City's unique urban landscape. (Imp. 2.1, 3.8)

OS 6.6 Lighting. Minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary. (Imp. 2.1)

OS 6.7 Glare. Require that new development avoid the creation of incompatible glare through use of appropriate materials and design features. (Imp. 2.1)

Beverly Hills Municipal Code

Title 10 (Planning and Zoning), Chapter 3 (Zoning), Article 30 (Architectural Commission, Architectural Review, and Procedure) of the Beverly Hills Municipal Code (BHMC) establishes an Architectural Commission, architectural review, and procedures for review of certain development in the City. Prior to issuance of a building permit, an architectural review of development within any zone, except a single-family residential zone, by the Architectural Commission is required and City Council if appealed. Issuance of a building permit is contingent on first obtaining architectural approval based upon criteria identified in Section 10-3-3010 "Criteria" of the BHMC. The City's Architectural Commission or City Council may approve, approve with conditions, or disapprove a project after consideration of the criteria. In addition, proposed lighting is subject to architectural review pursuant to Chapter 3, Zoning, Article 30. Section 10-3-19.5 "Commercial-Residential Transition; General Development Requirements" states that all commercial uses located adjacent to residential uses must not have mirrored or reflective glass or material used on the façades of the building, structure, or improvement that faces any residential use.

Title 5 (Public Health, Welfare, and Sanitation), Chapter 6 (Miscellaneous Restrictions and Prohibitions), Article 11 (Residential Property Lighting) of the BHMC addresses light and glare issues and contains requirements intended to limit the light and glare effects of new development to less than significant. Section 5-6-1101 "Excessive Lighting Prohibited" prohibits the installation, use, or maintenance of any lighting that creates an intensity of light on residential property that is greater than 1 foot-candle (the illumination produced by a source of one candle received on a 1-square-foot surface area at a distance of 1 foot, equal to 1 lumen incident) above ambient light level and specifies that all permissive lighting shall be arranged to focus on the property from which it originates and shall not directly reflect upon any adjacent residential property. Section 10-4-314 "Lighting of Premises" states that any perimeter, flood

lighting, or other external lighting shall be permitted only when such lighting is installed on private property and shielded so that no direct beams fall upon public streets, alleys, highways, or other private property.

The BHMC also establishes standards for development that relate to visual quality. Development standards such as building heights, lot coverage, setbacks, landscaping, signage, lighting, and access are identified for each zone. Existing zoning in the Project and Project Alternatives area is discussed in Section 2, Project Description, of this Draft EIR. The Project and Project Alternatives would be subject to the BHMC as applicable.

3.1.2 Methodology and CEQA Thresholds

Resource Study Area

To assess the potential visual changes that would result from the construction and operation of the Project and Project Alternatives, eight Key Observation Points (KOPs) were selected as shown on Figure 3.1-1. The KOPs are representative of direct views within the Project and Project Alternatives area. The resource study area (RSA) consists of areas surrounding the Project and Project Alternatives, which have direct views of or line-of-sight to the Project and/or Project Alternatives sites. Visual simulations from these KOPs were prepared to provide a before and after comparison of the visual effects that would result from the Project and Project Alternatives.

Methodology

Visual or aesthetic resources are the natural and built features of the landscape that can be seen. The combination of landform, water, and vegetation patterns represents the natural landscape features that define an area's visual character. Built features, such as buildings, roads, utility structures, and ornamental plantings, reflect human modifications to the landscape. These natural and built landscape features, or visual resources, contribute to the public's experience and appreciation of the environment.

The process used in this visual impact assessment generally follows the guidelines outlined in the publication *Guidelines for the Visual Impact Assessment of Highway Projects* published by the Federal Highway Administration (FHWA) in January 2015, which is an updated version of publication *Visual Impact Assessment for Highway Projects* also published by FHWA in March 1981. Although this guidance was developed for highway projects, it is adaptable to many types of projects. The major components of the visual impact assessment include establishing the visual setting and assessing impacts of the project alternatives on visual resources, such as nearby natural or constructed features.

The degree of visual impact was determined by assessing the visible changes that would be introduced by the Project and Project Alternatives. The assessment focuses on areas where changes in the visual environment would be greatest, such as at station entrances, as well as areas with higher viewer sensitivity and/or where sensitive views would be affected. The assessment of potential visual impacts addresses the following:

- Conflicts or complements to the existing visual character



Figure 3.1-1 Key Observation Points Locations

- Changes in visual quality
- Likely impact on viewers with consideration of viewer sensitivity
- Visual intrusion and blockage of sensitive views with an emphasis placed on any views that are identified by local jurisdictions as requiring protection
- Increases in light and glare

The viewer population is a mix of major viewer groups that includes residents, tourists, shoppers, commuters, people taking advantage of the cultural and culinary attractions in the RSA, and people who work in this area. Scenic views are defined as long-range views toward preserved natural areas or recognized visual and/or historic landmarks. A visual change would be considered significant if it introduces obstructive elements substantially out of character with existing land uses or substantially obscures a scenic view or vista available to major viewer groups near project features. The degree of visual impact is determined by assessing visible changes that would be introduced by the Project during construction and operation, as well as viewers' exposure and sensitivity to these changes. Consideration has been given for removal of or impacts to open plazas adjacent to buildings.

CEQA Thresholds

An impact is considered significant if the project would:

1. Have a substantial adverse effect on a scenic vista;
2. Substantially degrade scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway;
3. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, if the project would conflict with applicable zoning and other regulations governing scenic quality; and/or
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

3.1.3 Existing Conditions

This section describes viewer characteristics and sensitivity, as well as the existing visual character, quality, and key views in the RSA. The RSA for visual and aesthetics consists of the viewsheds around station entrances. Viewsheds are the areas from which the project elements and alternatives could be viewed. In general, the viewsheds for the Project encompass the foreground viewing distance (generally along the project alignment and within a half-mile of a given viewpoint), but this may vary depending upon elements in the landscape (e.g., terrain, vegetation, and buildings that can block views of objects).

The existing visual quality is generally categorized as low, moderate, or high. The three quality categories are as follows:

- **Low Visual Quality.** These areas exhibit features that seem visually out of place, lack visual coherence, do not have a compositional harmony, and contain eyesores.

- **Moderate Visual Quality.** These areas are generally pleasant appearing but may lack an overall distinctiveness, memorability, drama, and compositional harmony, or may simply be common and ordinary landscapes that lack strong and consistent architectural and urban design features.
- **High Visual Quality.** These areas tend to be memorable, distinctive, unique (in a positive way), intact natural or park-like areas, or urban areas with strong and consistent architectural and urban design features.

Viewer Characteristics and Sensitivity

The viewer population is a mix of major viewer groups, including residents, tourists, shoppers, commuters, people taking advantage of the cultural and culinary attractions in the RSA, and people who work in the area. Commuters, including bicyclists and motorists on streets, generally have lower expectations and sensitivity about visual quality than other viewer groups because they are focused on driving in traffic. The remaining viewers would have higher expectations about the visual quality of the environment either because their activities are elective or because they spend a great deal of time in the RSA.

Viewer sensitivity or concern is based on the visibility of resources in the landscape, the proximity of viewers to the visual resource, the relative elevation of the viewers compared to the visual resource, the frequency and duration of views, the number of viewers, and the types and expectations of individuals. In considering visual impacts of the Project and Project Alternatives, key views and visually prominent features have been assessed to determine how they would most influence impact perception.

Visual Character/Quality Setting

Overall, the visual setting within the RSA varies and includes a densely developed commercial area with large- and small-scale development. Large-scale commercial buildings are concentrated along Wilshire Boulevard. The Wilshire/Rodeo Station area is characterized by high-end retail shops along Beverly Drive north and south of Wilshire Boulevard, and hotel, commercial, gallery, and mixed-use buildings along Wilshire Boulevard. Small and large office buildings, as well as restaurants are located along Canon Drive. The area is quite dense and built out with minimal empty parcels. Buildings north of Wilshire Boulevard are larger and more tightly packed, consisting of commercial, retail, residential, and mixed-uses. Buildings south of Wilshire Boulevard are single-family residences and small multi-family apartment buildings that are set back from the street. Commercial buildings are also on the south side of Wilshire Boulevard at South Beverly Drive. South of this commercial frontage, some of the buildings along South Beverly Drive have café seating on the sidewalk and numerous mature street trees are visible.

The predominate architectural style in this area is eclectic with Modern, Neo-Traditional, International, Art Deco, and less distinguishable commercial, retail, and mixed-use buildings. The nearby neighborhood includes a variety of residential architectural styles, including bungalow, Spanish Eclectic, courtyard, Tudor, and Colonial styles, among others (Metro 2010). Prominent commercial buildings adjacent to the Project and Project Alternatives include the California Bank Building (Sterling Plaza), which is an Art Deco wedding cake-style building; the Wilshire Beverly Center (Chase Bank), which is an Abstract Modernist-style (Neo-Expressionist) building; and the Beverly Hills Financial Center, which is a concrete and steel building with elements of Brutalism and the International Style. Additional information regarding architectural details are provided in Section 3.4, Cultural Resources, of this EIR.

No open spaces of notable size are within the RSA. However, views north to the Santa Monica Mountains and the slopes of Beverly Hills form a memorable contrast to the urban environment. Views east and west down Wilshire Boulevard are also notable because of the tall buildings along its length. Tall palm trees, ubiquitous in downtown Beverly Hills, are prominent visual resources, and Wilshire Boulevard has landscaped center medians with trees every few blocks. Commercial signage, overhead street lights, and traffic signals are prominent visual elements along Wilshire Boulevard. The existing visual quality in the RSA is high due to the strong and consistent architectural and urban design features present.

Scenic Vistas and Resources

The Project site is in a developed area of the City. The City does not have clearly defined scenic vistas and no scenic views currently exist on site or are available from the Project site. The mountains to the north may be visible from the streets and residential areas in and around the Project site, but views are limited by the multi-story development lining the surrounding street corridors. There are no other significant natural features (such as rock outcroppings, bodies of water, substantial stands of native vegetation, etc.) or native California trees of particular aesthetic value (e.g., oak trees) on the Project site. There are no natural open spaces on the Project site, and the site is not within a City- or state-designated scenic highway.

Light/Glare

The Project site is in a developed urban area and is regularly exposed to high levels of existing glare during the daytime and light during evening hours. The existing sources of light and glare in the Project vicinity are from the office building and adjacent commercial, residential, and roadway uses. Types of existing lighting include interior and exterior lighting, street lights and signals, automobile headlights, and reflection of light from windows and other reflective surfaces on adjacent buildings and structures. The source of glare on the Project site is from the windows of adjacent buildings.

3.1.4 Impact Evaluation

Impact AES-1. Have a substantial adverse effect on a scenic vista.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Therefore, no impacts would occur related to a substantial adverse effect on a scenic vista beyond those previously evaluated in the Purple Line Extension EIR.

The Project and Project Alternatives

Construction and Operational Impacts

A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. A significant impact would occur if a project introduced incompatible visual elements within a field of view containing a scenic vista or substantially altered a view of a scenic vista.

Scenic views or vistas are panoramic public views of various natural features, including the ocean, striking or unusual natural terrain, or unique urban or historic features. Public access to these views may be available from nearby parklands, private and public-owned sites, and public right-of-way (ROW).

The City of Beverly Hills General Plan does not delineate or designate any specific views as protected scenic vistas within the RSA. The Project and Project Alternatives sites are within an urban setting within the Wilshire Boulevard commercial corridor. The Project and Project Alternatives would include a new station portal entrance/exit on the north side of Wilshire Boulevard to the previously approved Wilshire/Rodeo Station. The portal would involve the construction and operation of a one-story aboveground portion, and additional levels below-grade. The construction and operations of the Project and Project Alternatives would include visible features; however, the Project and Project Alternatives would not alter the views of a designated scenic vista. Therefore, construction and operational impacts related to effects on a scenic vista would be less than significant.

Impact AES-2. Substantially degrade scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Therefore, no impacts would occur related to the degradation of scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

The Project and Project Alternatives

Construction and Operational Impacts

A significant impact would occur where scenic resources within a state scenic highway were damaged or removed as a result of the Project or Project Alternatives. The Project and Project Alternatives are not located along or near an officially designated California Scenic Highway or locally designated scenic highway. The nearest highway to the Project site that is included in the California Scenic Highway Mapping System is California Route 27 (CA-27), also known as the Topanga Canyon State Scenic Highway (Caltrans 2019). The portion of this highway designated as scenic is over 10 miles west/northwest of the Project site.

The Project and the Cañon Drive-Half Portal Alternative would remove ornamental street trees during construction. The Project would relocate four trees that are located on the west side of Beverly Drive, and would permanently remove one tree from this location that would potentially be relocated elsewhere in the area as feasible. The Cañon Drive-Half Portal Alternative would permanently remove five trees from the west side of Cañon Drive, to potentially be relocated elsewhere in the area as feasible. The Cañon Drive Staging Yard Alternative would not require the removal of any existing trees. Additionally, no scenic resources such as groves of trees or rock outcroppings are located on the Project or Project Alternatives sites. Therefore, no construction or operational impacts to scenic resources would occur.

Impact AES-3. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, if the project would conflict with applicable zoning and other regulations governing scenic quality.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Therefore, no impacts would occur related to the degradation of visual character or quality, or conflict with applicable regulations governing scenic quality.

The Project (Beverly Drive)

Construction Impacts

The construction phase of the Project would be temporary in nature; lasting approximately 2.5 to 3.5 years. The construction process would include provisions for laydown and staging areas, haul routes and traffic control, utility relocations, decking, excavation and piling, connection with the existing station, and systems connections. In addition, the construction area would be fenced off and closed to public access; construction equipment storage and staging would occur on the site; and the removal and planting of street trees would occur as described in Chapter 2, Project Description. The Project would not include the demolition of any existing buildings; however, demolition of existing public roadway and sidewalks would be required.

The Project site consists of a portion of the public ROW, including roadway and sidewalks, along Beverly Drive and Wilshire Boulevard. Street trees also exist within the public ROW on the west side of Beverly Drive. During the construction phase, the visual character of the Project site would change temporarily from existing conditions. The Project site would be fenced off with a chain-linked fence and construction noise barriers, resulting in a contrast and change in visual character from the existing roadway and sidewalk area. Whether any temporary community artwork or mural would be included as part of the fencing is to be determined. The designated construction area, and the construction truck and delivery ingress/egress areas along Wilshire Boulevard and north along Beverly Drive would experience additional truck traffic than under existing conditions, with trucks moving materials on- and off-site, and work crews and construction equipment moving around the Project site.

Passing motorists would primarily experience views of construction activities while driving along the roadways adjacent to the Project site, including Wilshire Boulevard and the portion of Beverly Drive north and south of the closed construction area. In addition, motorists would have prolonged views while idling at the various traffic signals surrounding the Project site. The change in the visual character of the Project site during the construction phase would be noticed by passing motorists. However, passing motorists are considered to have a low sensitivity to any visual changes on the Project site as they are likely passing through the Project area to reach their destinations and do not necessarily have a personal investment in the visual character of the Project site.

The patrons and employees of commercial and other land uses in the Project area would primarily experience views of the construction activities on the Project site as they approach and

leave their commercial destination or place of work. Therefore, their views of the construction activities would primarily take place while en route to and from these locations in the Project area. The land uses would include the Maybourne Beverly Hills Hotel (formerly known as the Montage Beverly Hills Hotel); Bank of America Financial Centre offices; Union Bank offices; Chase Bank offices; MGM studios; and surrounding fitness centers, restaurants, and retail establishments. The employees of Project area land uses would not be highly sensitive to visual changes occurring on the Project site during the construction phase. In addition, patrons of Project area land uses may be more sensitive than the employees, but nevertheless would not likely change their patronage due to visual changes taking place on the Project site during the construction phase. Guests or patrons of the Maybourne Beverly Hills Hotel would have private window views of the Project construction site to the west located beneath the hotel on the street level. However, the Project construction activities would be temporary and construction work is already occurring related to the Wilshire/Rodeo Station. A temporary impact to the visual character would result for Project area patrons and employees, a viewer group that would be moderately sensitive to visual changes but may have less of a personal investment in the visual appearance of the Project site.

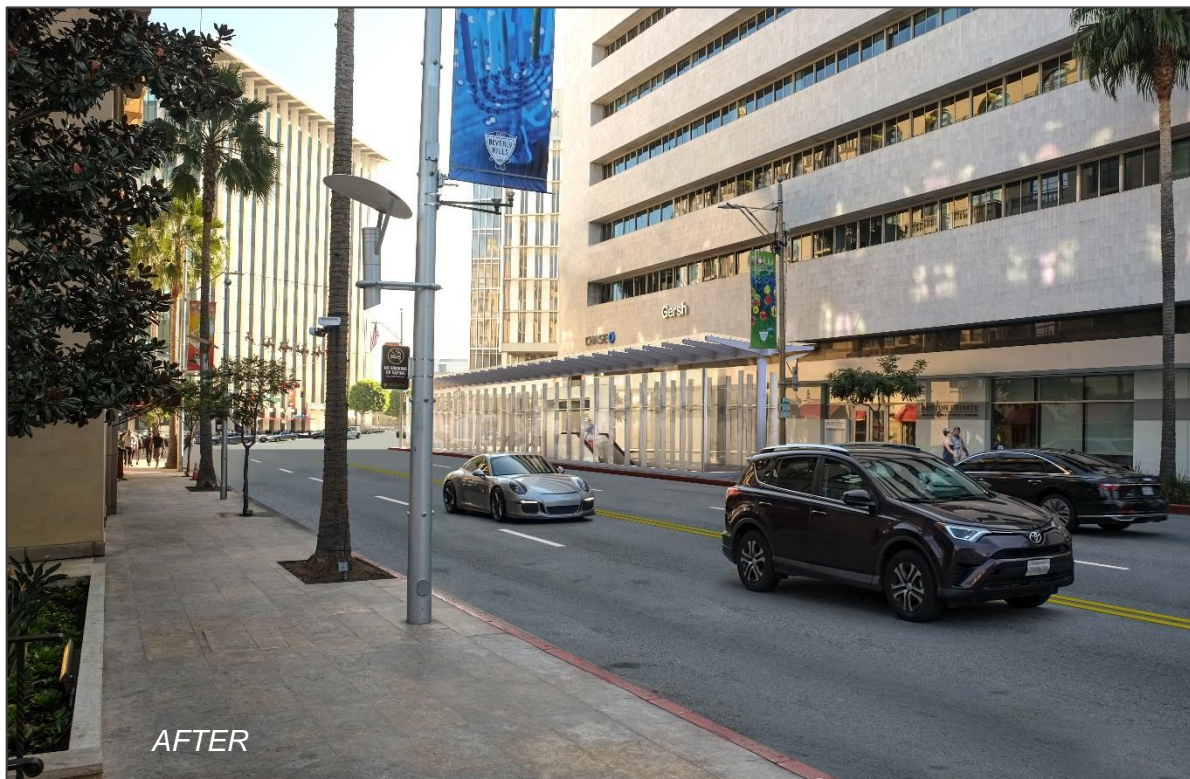
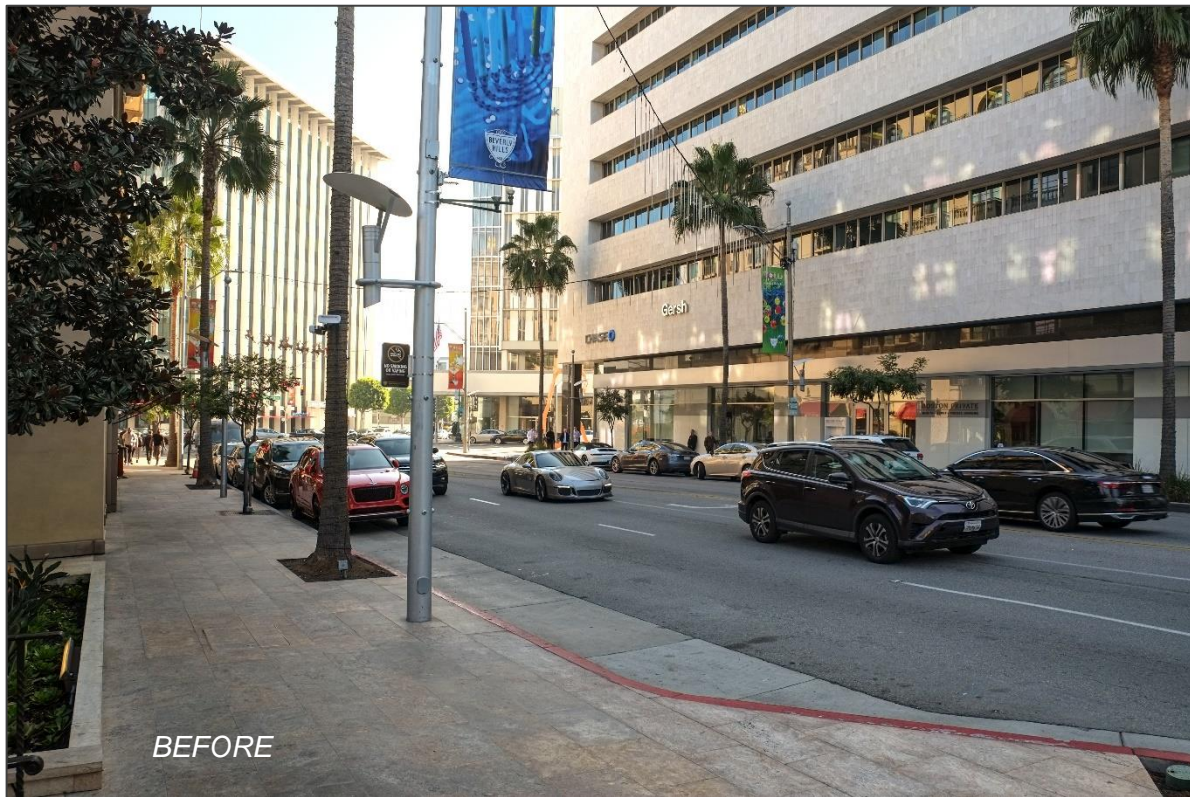
Overall, the construction phase would represent a temporary change in the visual quality and character of the Project site. However, the construction site would be visibly similar to other construction projects in the City and urban areas. During construction, the Project site may potentially stand out as a memorable or remarkable feature in the landscape due to its temporary negative impact on the visual character and quality of the site and its surroundings. However, the construction impact would be temporary and reversible. Therefore, construction impacts related to visual character would be less than significant.

Operational Impacts

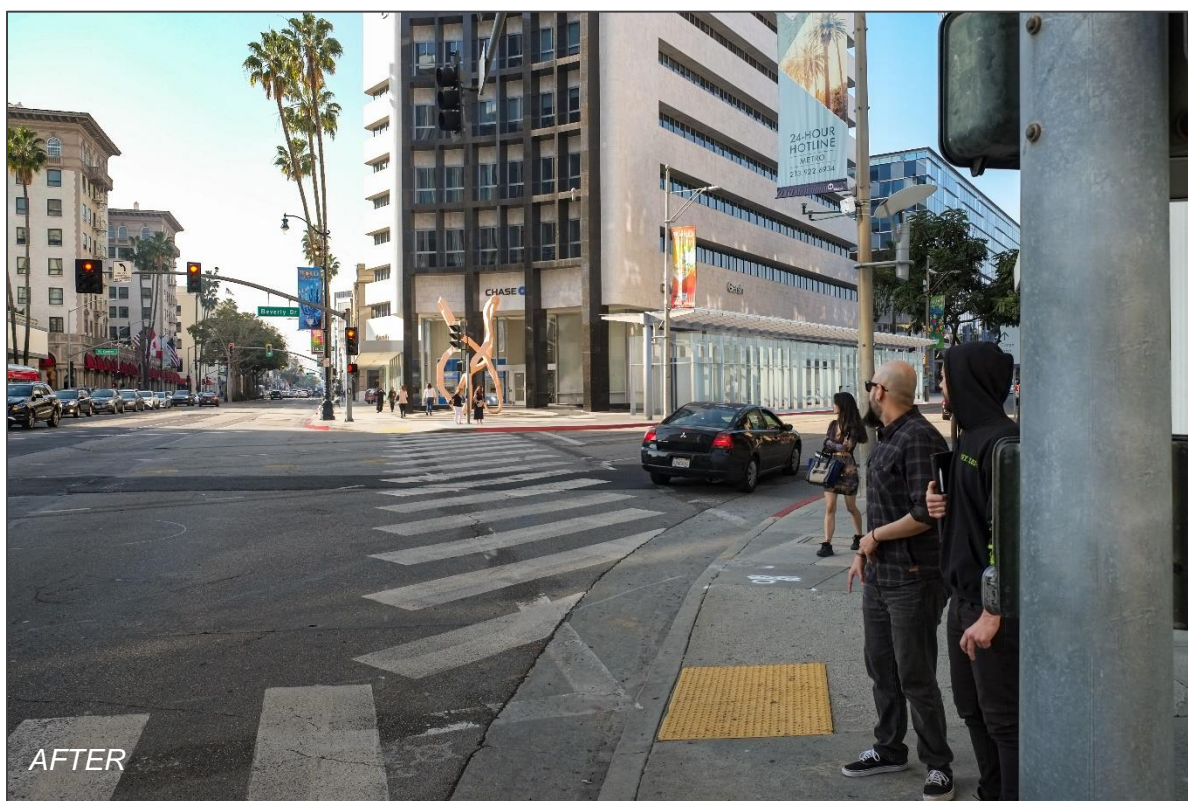
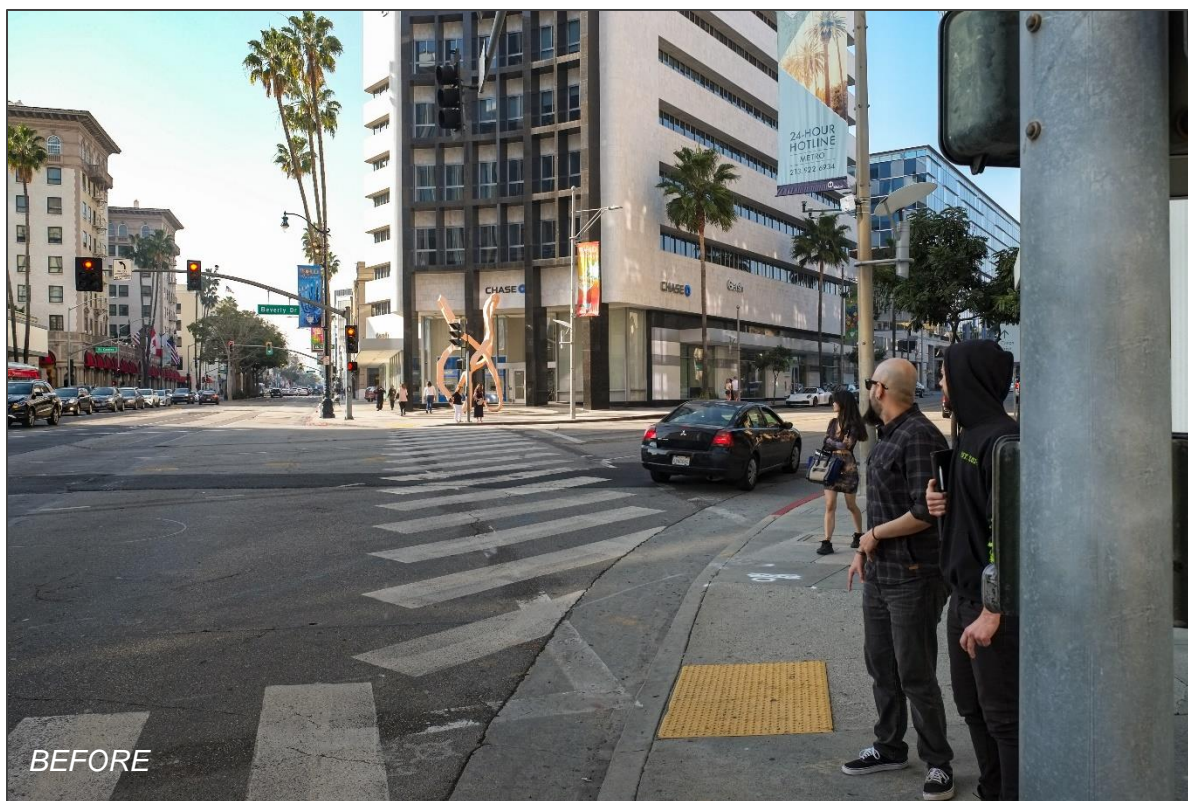
The Project would be within an urban environment and would be consistent with the City's General Plan goals to protect scenic views and vistas, including urban views in the City. To assess the potential visual changes that would result from the operation of the Project, three KOPs were selected specifically for the Project, as shown below. Visual simulations from these KOPs were prepared to provide a before and after comparison of the visual effects that would result from the Project. The location of the KOPs are shown above on Figure 3.1-1. The KOP existing views and simulations are shown on Figure 3.1-2, Figure 3.1-3, and Figure 3.1-4.

The KOPs are representative of direct views within the Project site and area; simulations from the same locations show how these views would change as a result of the implementation of the Project. The simulated views represent conceptual design and are not intended to represent the final project design. The simulations are included to conceptually illustrate the general visual changes that would be expected to occur with the Project. However, the simulations do not include all design elements discussed in the text of this section and do not represent the final design of the Project.

KOP 1 shows the Project site looking southwest along Beverly Drive toward the existing Beverly Drive public ROW and approximately eight-story Chase Bank office building from the public sidewalk adjacent to the Beverly Cañon Gardens public open space area (see Figure 3.1-2). This is a view typically seen by patrons and employees of the Beverly Cañon Gardens Park, office buildings, and commercial businesses in the Project area, as well as pedestrians, including tourists. The background of the view shows a portion of the outdoor art sculpture



**Figure 3.1-2 KOP 1 – Before and After Simulation View,
Looking Southwest along Beverly Drive**



**Figure 3.1-3 KOP 2 – Before and After Simulation View,
Looking West/Northwest along Wilshire Boulevard at Beverly Drive**



**Figure 3.1-4 KOP 3 – Before and After Simulation View,
Looking North along Beverly Drive at Wilshire Boulevard**

element on the northwest corner of Wilshire Boulevard and Beverly Drive (adjacent to the Chase Bank office building), as well as the multi-story Union Bank and Bank of America Financial Center buildings on the south side of Wilshire Boulevard. Existing street trees, street and sidewalk lighting, and decorative City banners, as well as minor overhead power lines are also visible in the existing view.

As shown on Figure 3.1-2, the new approximately one-story structure is on the west side of Beverly Drive within the public ROW and directly adjacent to the Chase Bank office building. From KOP 1, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of a new escalator entrance within the portal is also visible from this view. The new portal appears to block views of the outdoor art sculpture element at the northwest corner of Wilshire Boulevard and Beverly Drive. In addition, a small street tree along Beverly Drive, as well as several on-street parking spaces, are removed at the new portal location. The view from KOP 1 represents a visual change compared to existing conditions. However, due to the dense urban and visual environment of Beverly Drive and the Project area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in coordination with Metro and with local entities as applicable to ensure that the visual character of the Project would be consistent with the existing visual character along Beverly Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

KOP 2 shows the Project site looking west/northwest along Beverly Drive from the intersection with Wilshire Boulevard (see Figure 3.1-3). The view is generally looking toward the existing Beverly Drive public ROW and approximately eight-story Chase Bank office building from the public sidewalk along the north side of Wilshire Boulevard adjacent to the Sterling Plaza building. The view includes the outdoor art sculpture at the northwest corner of Wilshire Boulevard and Beverly Drive. This is a view typically seen by patrons and employees of the office buildings and commercial businesses in the Project area; pedestrians, including tourists; and commuters. The background of the view on the right shows the approximately five-story MGM Studios building with a primarily glass exterior. The background of the view on the left shows the approximately eight-story Beverly Wilshire Hotel building on the south side of Wilshire Boulevard, along with other uses as part of the commercial corridor. Existing street trees, street and sidewalk lighting, and decorative City banners are also visible in this existing view.

As shown on Figure 3.1-3, the new approximately one-story-tall structure is on the west side of Beverly Drive within the public ROW and directly adjacent to the Chase Bank office building. From KOP 2, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of the new escalator and elevator entrances within the portal are also visible from this view. The new portal appears to block views of the lower-level façade of the Chase Bank office building. In addition, street trees along Beverly Drive, as well as several on-street parking spaces, are removed at the new portal location. The view from KOP 2 represents a visual change compared to existing conditions. However, due to the dense urban and visual environment of Beverly Drive and the Project area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in coordination with Metro and with local entities as applicable to ensure that the visual character of the Project would be consistent with the existing visual character along Beverly Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

KOP 3 shows the Project site looking north along Beverly Drive from the intersection with Wilshire Boulevard (see Figure 3.1-4). The view is generally looking north from the public sidewalk at the southwest corner of the intersection of Wilshire Boulevard and Beverly Drive toward the existing public ROWs, the approximately eight-story Maybourne Beverly Hills Hotel on the east side of Beverly Drive, and the outdoor art sculpture at the northwest corner of Wilshire Boulevard and Beverly Drive, adjacent to the approximately eight-story Chase Bank office building. This is a view typically seen by patrons and employees of the office buildings and commercial businesses in the Project area; pedestrians, including tourists; and commuters. The background of the view on the right shows the Beverly Cañon Gardens open space area and one- to two-story commercial businesses and shops to the north on the east side of Beverly Drive. Existing street trees of varying heights, street and sidewalk lighting, and decorative City banners are also visible in this existing view.

As shown on Figure 3.1-4, the new approximately one-story-tall structure is on the west side of Beverly Drive within the public ROW and directly adjacent to the Chase Bank office building and existing outdoor art sculpture. From KOP 3, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of the new escalator and elevator entrances within the portal are also visible from this view. The new portal appears to block views of the lower-level façade of the Maybourne Beverly Hills Hotel, Beverly Cañon Gardens open space area, and commercial buildings and shops to the north. In addition, street trees along Beverly Drive, as well as several on-street parking spaces, are removed at the new portal location. The view from KOP 3 represents a visual change compared to existing conditions, as the modern portal is not consistent with the classic style of the Maybourne Beverly Hills Hotel structure to the east. However, due to the dense urban and visual environment of Beverly Drive and the Project area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in coordination with Metro and with local entities as applicable to ensure that the visual character of the Project would be consistent with the existing visual character along Beverly Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

Overall, the operation of the Project would represent a change in visual character as compared to the existing Project site. However, the Project is in an urban area that currently has a mix of architectural styles and building materials and colors, as well as a mix of modern and traditional style buildings. Viewers including pedestrians, commuters, and patrons and employees of Project area commercial businesses and offices would have a low to moderate sensitivity to the visual change and may have less of a personal investment in the visual appearance of the Project site. In addition, as the above analysis has shown, this alternative would be consistent with the City's General Plan goals to protect scenic views and vistas, including urban views in the City. The operation of the Project, therefore, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. As a result, the Project would not conflict with zoning and other regulations governing scenic quality discussed in Section 3.1.1 above. The Project would be within the public ROW; therefore, zoning regulations would not be applicable. In addition, the Project would not conflict with the applicable policies within the City of Beverly Hills General Plan Open Space Element because the Project would not substantially change views in the area. Therefore, operational impacts related to visual character would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

The construction process and duration, as well as construction impacts to visual character for the Cañon Drive-Half Portal Alternative, would be similar to the construction visual character impacts of the Project as discussed above.

The Cañon Drive-Half Portal Alternative site consists of a portion of the public ROW, including roadway and sidewalks, along Cañon Drive and Wilshire Boulevard. Street trees also exist within the public ROW on the west side of Cañon Drive. During the construction phase, the visual character of the alternative site would change temporarily from existing conditions. The site would be fenced off with a chain-linked fence and construction noise barriers, resulting in a contrast and change in visual character from the existing roadway and sidewalk area. Whether any temporary community artwork or mural would be included as part of the fencing is to be determined. The designated construction area, the construction truck and delivery ingress/egress areas along Wilshire Boulevard, and the secondary ingress/egress on North Cañon Drive would exhibit additional truck traffic than under existing conditions, with trucks carrying materials on- and off-site, and work crews and construction equipment moving around the site.

Passing motorists would primarily experience views of construction activities while driving along the roadways adjacent to the Cañon Drive-Half Portal Alternative site, including Wilshire Boulevard and the portion of Cañon Drive north and south of the closed construction area. In addition, motorists would have prolonged views while idling at the various traffic signals surrounding the site. The change in the visual character of the site during the construction phase would be noticed by passing motorists. However, passing motorists are considered to have a low sensitivity to any visual changes on the site as they are likely passing through the area to reach their destinations and do not necessarily have a personal investment in the visual character of the site.

The patrons and employees of commercial and other land uses in the area would primarily experience views of the construction activities on the Cañon Drive-Half Portal Alternative site as they approach and leave their commercial destination or place of work. Therefore, their views of the construction activities would primarily take place while en route to and from these locations in the area. These land uses would include the Bank of the West office building, Coldwell Banker Real Estate office building, Maybourne Beverly Hills Hotel, restaurants, and small office buildings. The employees of adjacent land uses would not be highly sensitive to visual changes occurring on the Cañon Drive-Half Portal Alternative site during the construction phase. In addition, patrons of adjacent land uses may be more sensitive than the employees, but nevertheless would not likely change their patronage due to visual changes taking place on the Cañon Drive-Half Portal Alternative site during the construction phase. Guests or patrons of the Maybourne Beverly Hills Hotel would have private window views of the Cañon Drive-Half Portal Alternative construction site located beneath the hotel on the street level to the southeast. However, the construction activities would not be permanent and construction is already occurring related to the Wilshire/Rodeo Station. A temporary impact to the visual character would result for area patrons and employees, a viewer group that would be moderately sensitive to visual changes but have less of a personal investment in the visual appearance of the site.

Overall, the construction phase would represent a temporary change in the visual quality and character of the Cañon Drive-Half Portal Alternative site. However, the construction site would be visibly similar to other construction projects in the City and urban areas. During construction,

the site may potentially stand out as a memorable or remarkable feature in the landscape due to its temporary negative impact on the visual character and quality of the site and its surroundings. However, the construction impact would be temporary and reversible. Therefore, construction impacts related to visual character would be less than significant.

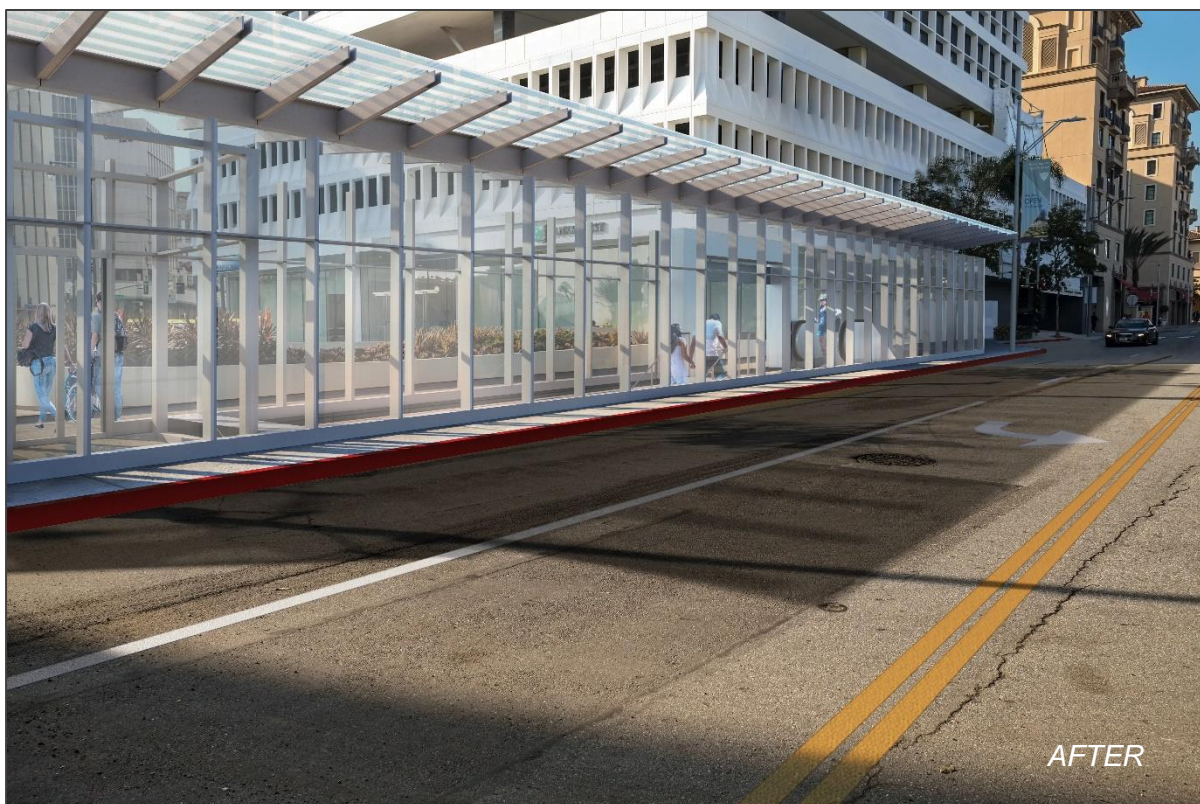
Operational Impacts

The Cañon Drive-Half Portal Alternative would be located within an urban environment and would be consistent with the City's General Plan goals to protect scenic views and vistas, including urban views in the City. To assess the potential visual changes that would result from the operation of the Cañon Drive-Half Portal Alternative, three KOPs were selected specifically for this alternative, as shown below. Visual simulations from these KOPs were prepared to provide a before and after comparison of the visual effects that would result from the Cañon Drive-Half Portal Alternative. The location of the KOPs are shown above on Figure 3.1-1. The KOP existing views and simulations for the Cañon Drive-Half Portal Alternative are shown on Figure 3.1-5, Figure 3.1-6, and Figure 3.1-7.

The KOPs are representative of direct views within the Project site and area; simulations from the same locations show how these views would change as a result of the implementation of the Cañon Drive-Half Portal Alternative. The simulated views represent conceptual design and are not intended to represent the final project design. The simulations are included to conceptually illustrate the general visual changes that would be expected to occur with the Cañon Drive-Half Portal Alternative. However, the simulations do not include all design elements discussed in the text of this section and do not represent the final design of the Cañon Drive-Half Portal Alternative.

KOP 4 shows the Cañon Drive-Half Portal Alternative site looking northwest along Cañon Drive toward the existing public ROW and the approximately 11-story Bank of the West office building, with adjacent plaza area, viewing from near the public sidewalk adjacent to the Coldwell Banker office building (see Figure 3.1-5). This is a view typically seen by patrons and employees of the office buildings, commercial businesses, and restaurants near the site, as well as commuters and pedestrians, including tourists. The background of the view on the right shows the east side of the eight-story Maybourne Beverly Hills Hotel, which includes the main hotel entrance. The background of the view on the left shows the multi-story Union Bank and Bank of America Financial Center buildings on the south side of Wilshire Boulevard. Existing street trees and shrubs of varying varieties and heights, street and sidewalk lighting, and decorative City banners are also visible in the existing view.

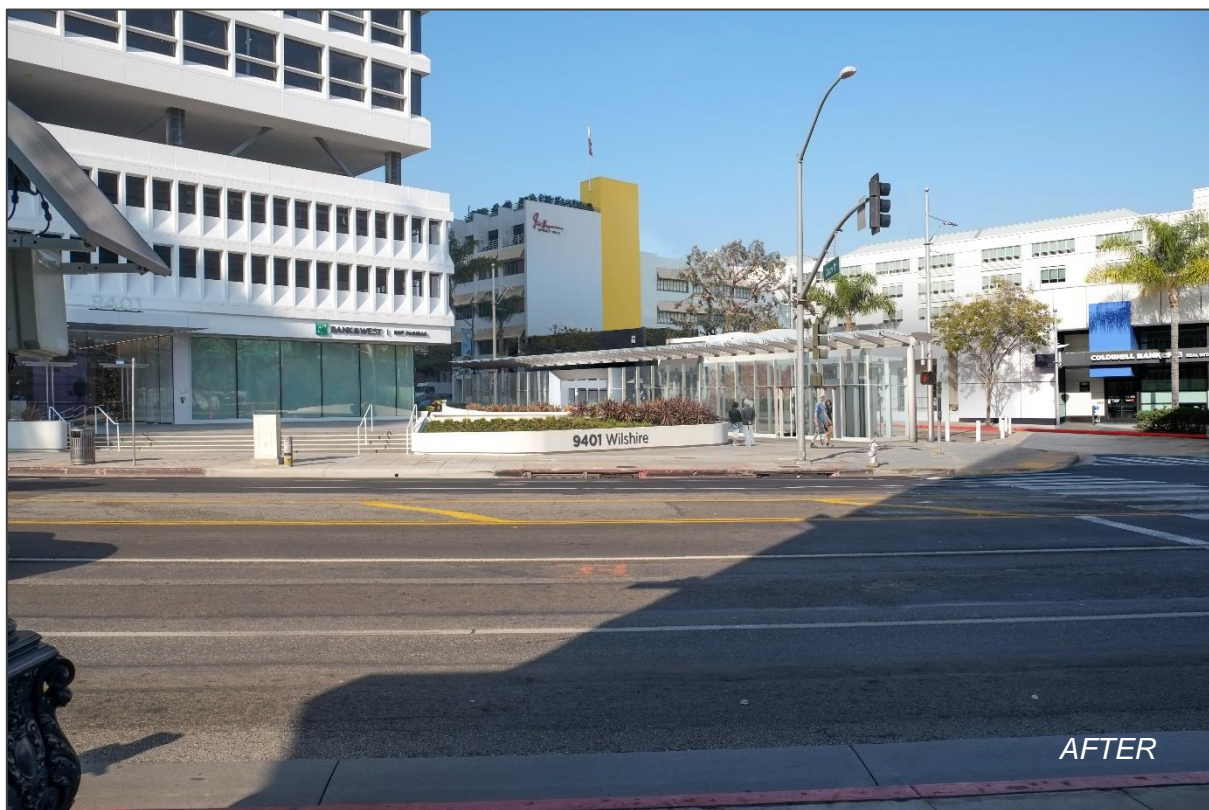
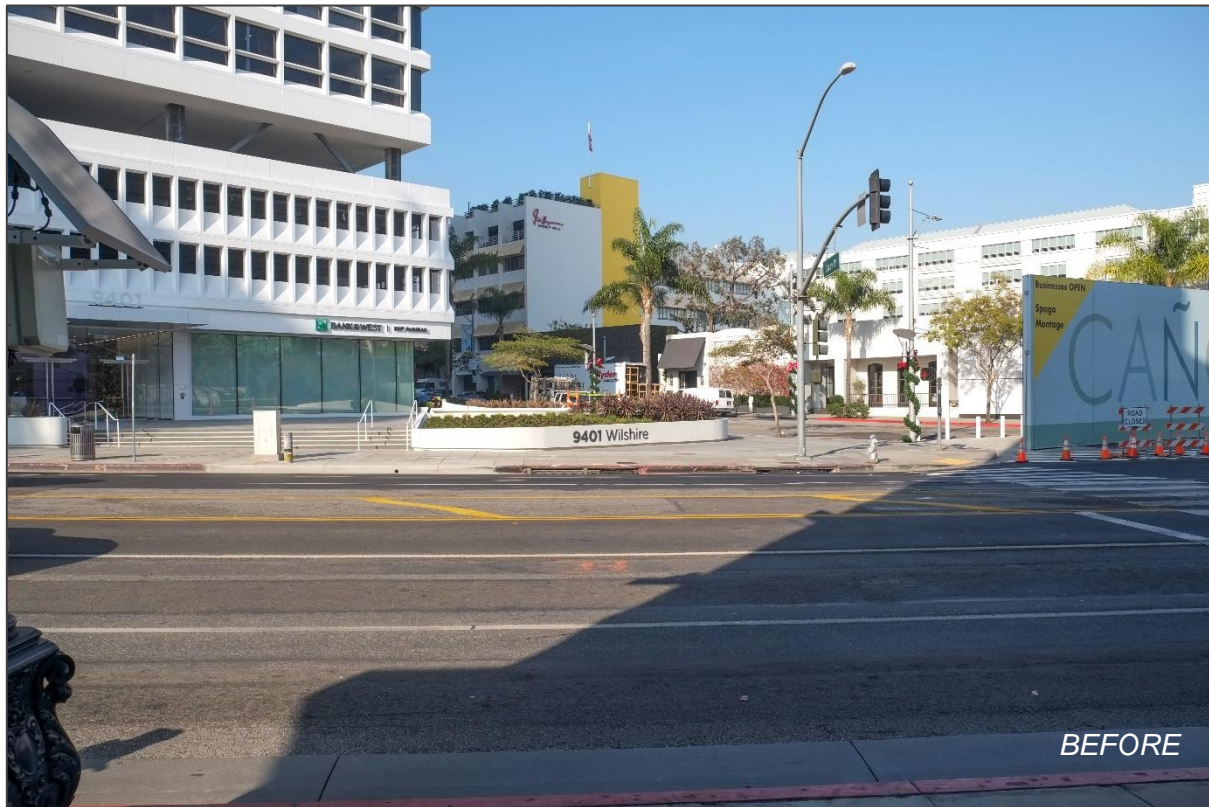
As shown on Figure 3.1-5, the new approximately one-story-tall structure is on the west side of Cañon Drive within the public ROW and directly adjacent to the Bank of the West office building and adjoining outdoor plaza area. From KOP 4, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of the new escalator, elevator, and stairway entrances within the portal are also visible from this view. The new portal appears to partially block views of the lower façade of the Bank of the West office building, as well as the adjoining outdoor plaza area. In addition, several street trees along Cañon Drive, as well as several on-street parking spaces, are removed at the new portal location. The view from KOP 4 represents a visual change compared to existing conditions. However, due to the dense urban and visual environment of Cañon Drive and the adjacent area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in



**Figure 3.1-5 KOP 4 – Before and After Simulation View,
Looking Northwest along Cañon Drive**



**Figure 3.1-6 KOP 5 – Before and After Simulation View,
Looking Southwest along Cañon Drive**



**Figure 3.1-7 KOP 6 – Before and After Simulation View,
Looking North from Wilshire Boulevard**

coordination with Metro and with local entities as applicable to ensure that the visual character of the Cañon Drive-Half Portal Alternative would be consistent with the existing visual character along Cañon Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

KOP 5 shows the Cañon Drive-Half Portal Alternative site looking southwest along Cañon Drive toward the existing public ROW and the approximately 11-story Bank of the West office building, with adjacent plaza area, viewing from near the public sidewalk at the southeast corner of the intersection of Cañon Drive and Clifton Way (see Figure 3.1-6). This is a view typically seen by patrons and employees of the office buildings, commercial businesses, and restaurants near the site, as well as commuters and pedestrians, including tourists. The background of the view on the left shows a colorful mural, which is a temporary visual feature occurring during the ongoing construction of the Wilshire/Rodeo Station, as well as the two- to five-story translucent Rolex office building. Existing street trees and shrubs of varying varieties and heights, street and sidewalk lighting, and decorative City banners are also visible in the existing view.

As shown on Figure 3.1-6, the new approximately one-story-tall structure is on the west side of Cañon Drive within the public ROW and directly adjacent to the Bank of the West office building and adjoining outdoor plaza area. From KOP 5, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of the new escalator entrance within the portal is also visible from this view. The new portal appears to block views of the outdoor plaza area at the northwest corner of the intersection of Wilshire Boulevard and Cañon Drive. In addition, several street trees along Cañon Drive, as well as several on-street parking spaces, would be removed at the new portal location. The view from KOP 5 represents a visual change compared to existing conditions. However, due to the dense urban and visual environment of Cañon Drive and the adjacent area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in coordination with the appropriate City departments, Metro, and local residents through ongoing project meetings to ensure that the visual character of the Cañon Drive-Half Portal Alternative would be consistent with the existing visual character along Cañon Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

KOP 6 shows the Cañon Drive-Half Portal Alternative site in the middleground looking north from the public sidewalk on the south side of Wilshire Boulevard, just east of the intersection with Reeves Drive. The view includes the existing public ROW and the approximately 11-story Bank of the West office building, with adjacent plaza area, as well as the temporary street barrier located within the northern crosswalk at the intersection of Wilshire Boulevard and Cañon Drive (see Figure 3.1-7). This is a view typically seen by patrons and employees of the office buildings, commercial businesses in the adjacent area, and commuters and pedestrians, including tourists. The background of the view on the right shows the up to six-story AKA Beverly Hills Hotel. The center of the view shows the existing commercial, office, and restaurant land uses located on the east side of Cañon Drive. Existing street trees and shrubs of varying varieties and heights, street and sidewalk lighting, and decorative City banners are also visible in the existing view.

As shown on Figure 3.1-7, the new approximately one-story-tall structure is located on the west side of Cañon Drive within the public ROW and directly adjacent to the Bank of the West office building and adjoining outdoor plaza area. From KOP 6, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of

the new elevator entrance within the portal is also visible from this view. The new portal appears to block views of the lower façade of the office and restaurant land uses located on the east side of Cañon Drive. In addition, several street trees along Cañon Drive are removed at the new portal location. The view from KOP 6 represents a visual change compared to existing conditions. However, due to the dense urban and visual environment of Cañon Drive and the adjacent area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in coordination with Metro and with local entities as applicable to ensure that the visual character of the Cañon Drive-Half Portal Alternative would be consistent with the existing visual character along Cañon Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

Overall, the operation of the Cañon Drive-Half Portal Alternative would represent a change in visual character as compared to the existing alternative site. However, the adjacent area currently has a mix of architectural styles and building materials and colors, as well as a mix of modern and traditional style buildings. Viewers including pedestrians, commuters, and patrons and employees of adjacent area commercial businesses and offices would have a low to moderate sensitivity to the visual change and may have less of a personal investment in the visual appearance of the alternative site. In addition, as the above analysis has shown, this alternative would be consistent with the City's General Plan goals to protect scenic views and vistas, including urban views in the City. The operation of the Cañon Drive-Half Portal Alternative, therefore, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. As a result, the Cañon Drive-Half Portal Alternative would not conflict with zoning and other regulations governing scenic quality discussed in Section 3.1.1 above. This alternative would be located within the public ROW; therefore, zoning regulations would not be applicable. In addition, the Cañon Drive-Half Portal Alternative would not conflict with the applicable policies within the City of Beverly Hills General Plan Open Space Element because this alternative would not substantially change views in the area. Therefore, operational impacts related to visual character would be less than significant.

KOP 4 shows the Cañon Drive-Half Portal Alternative site looking northwest along Cañon Drive toward the existing public ROW and the approximately 11-story Bank of the West office building, with adjacent plaza area, viewing from near the public sidewalk adjacent to the Coldwell Banker office building (see Figure 3.1-5). This is a view typically seen by patrons and employees of the office buildings, commercial businesses, and restaurants near the site, as well as commuters and pedestrians, including tourists. The background of the view on the right shows the east side of the eight-story Maybourne Beverly Hills Hotel, which includes the main hotel entrance. The background of the view on the left shows the multi-story Union Bank and Bank of America Financial Center buildings on the south side of Wilshire Boulevard. Existing street trees and shrubs of varying varieties and heights, street and sidewalk lighting, and decorative City banners are also visible in the existing view.

As shown on Figure 3.1-5, the new approximately one-story-tall structure is on the west side of Cañon Drive within the public ROW and directly adjacent to the Bank of the West office building and adjoining outdoor plaza area. From KOP 4, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of the new escalator, elevator, and stairway entrances within the portal are also visible from this view. The new portal appears to partially block views of the lower façade of the Bank of the West office building, as well as the adjoining outdoor plaza area. In addition, several street trees along Cañon Drive, as well as several on-street parking spaces, are removed at the new portal location. The view from KOP 4 represents a visual change compared to existing conditions.

However, due to the dense urban and visual environment of Cañon Drive and the adjacent area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in coordination with Metro and with local entities as applicable to ensure that the visual character of the Cañon Drive-Half Portal Alternative would be consistent with the existing visual character along Cañon Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

KOP 5 shows the Cañon Drive-Half Portal Alternative site looking southwest along Cañon Drive toward the existing public ROW and the approximately 11-story Bank of the West office building, with adjacent plaza area, viewing from near the public sidewalk at the southeast corner of the intersection of Cañon Drive and Clifton Way (see Figure 3.1-6). This is a view typically seen by patrons and employees of the office buildings, commercial businesses, and restaurants near the site, as well as commuters and pedestrians, including tourists. The background of the view on the left shows a colorful mural, which is a temporary visual feature occurring during the ongoing construction of the Wilshire/Rodeo Station, as well as the two- to five-story translucent Rolex office building. Existing street trees and shrubs of varying varieties and heights, street and sidewalk lighting, and decorative City banners are also visible in the existing view.

As shown on Figure 3.1-6, the new approximately one-story-tall structure is on the west side of Cañon Drive within the public ROW and directly adjacent to the Bank of the West office building and adjoining outdoor plaza area. From KOP 5, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of the new escalator entrance within the portal is also visible from this view. The new portal appears to block views of the outdoor plaza area at the northwest corner of the intersection of Wilshire Boulevard and Cañon Drive. In addition, several street trees along Cañon Drive, as well as several on-street parking spaces, would be removed at the new portal location. The view from KOP 5 represents a visual change compared to existing conditions. However, due to the dense urban and visual environment of Cañon Drive and the adjacent area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in coordination with the appropriate City departments, Metro, and local residents through ongoing project meetings to ensure that the visual character of the Cañon Drive-Half Portal Alternative would be consistent with the existing visual character along Cañon Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

KOP 6 shows the Cañon Drive-Half Portal Alternative site in the middleground looking north from the public sidewalk on the south side of Wilshire Boulevard, just east of the intersection with Reeves Drive. The view includes the existing public ROW and the approximately 11-story Bank of the West office building, with adjacent plaza area, as well as the temporary street barrier located within the northern crosswalk at the intersection of Wilshire Boulevard and Cañon Drive (see Figure 3.1-7). This is a view typically seen by patrons and employees of the office buildings, commercial businesses in the adjacent area, and commuters and pedestrians, including tourists. The background of the view on the right shows the up to six-story AKA Beverly Hills Hotel. The center of the view shows the existing commercial, office, and restaurant land uses located on the east side of Cañon Drive. Existing street trees and shrubs of varying varieties and heights, street and sidewalk lighting, and decorative City banners are also visible in the existing view.

As shown on Figure 3.1-7, the new approximately one-story-tall structure is located on the west side of Cañon Drive within the public ROW and directly adjacent to the Bank of the West office

building and adjoining outdoor plaza area. From KOP 6, the primary visual change related to the new portal includes a modern transparent exterior with a canopy structure above. A portion of the new elevator entrance within the portal is also visible from this view. The new portal appears to block views of the lower façade of the office and restaurant land uses located on the east side of Cañon Drive. In addition, several street trees along Cañon Drive are removed at the new portal location. The view from KOP 6 represents a visual change compared to existing conditions. However, due to the dense urban and visual environment of Cañon Drive and the adjacent area, including various types of structures and architectural styles, this visual change would not be substantial. The final design, types, and colors of the external materials used would be in coordination with Metro and with local entities as applicable to ensure that the visual character of the Cañon Drive-Half Portal Alternative would be consistent with the existing visual character along Cañon Drive and Wilshire Boulevard. Therefore, operational impacts related to visual character would be less than significant.

Overall, the operation of the Cañon Drive-Half Portal Alternative would represent a change in visual character as compared to the existing alternative site. However, the adjacent area currently has a mix of architectural styles and building materials and colors, as well as a mix of modern and traditional style buildings. Viewers including pedestrians, commuters, and patrons and employees of adjacent area commercial businesses and offices would have a low to moderate sensitivity to the visual change and may have less of a personal investment in the visual appearance of the alternative site. In addition, as the above analysis has shown, this alternative would be consistent with the City's General Plan goals to protect scenic views and vistas, including urban views in the City. The operation of the Cañon Drive-Half Portal Alternative, therefore, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. As a result, the Cañon Drive-Half Portal Alternative would not conflict with zoning and other regulations governing scenic quality discussed in Section 3.1.1 above. This alternative would be located within the public ROW; therefore, zoning regulations would not be applicable. In addition, the Cañon Drive-Half Portal Alternative would not conflict with the applicable policies within the City of Beverly Hills General Plan Open Space Element because this alternative would not substantially change views in the area. Therefore, operational impacts related to visual character would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

The construction process and duration, as well as construction impacts to visual character for the Cañon Drive Staging Yard Alternative would be similar to the construction visual character impacts of the Project and Cañon Drive-Half Portal Alternative as discussed above. However, the Cañon Drive Staging Yard Alternative would also include the construction of an approximately 52-foot-tall ventilation shaft on the southeastern portion of the site.

The Cañon Drive Staging Yard Alternative is located in the northern construction staging yard established for the Section 2 project, as well as the adjacent public sidewalk, located along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive. During the construction phase, the visual character of the alternative site would be similar to existing conditions because the site is currently utilized as a construction staging yard. The site would be fenced off with a chain-linked fence and construction noise barriers, resulting in a contrast and change in visual character from the existing roadway and sidewalk area. Whether any temporary community artwork or mural would be included as part of the fencing is to be determined. The designated construction

area, the construction truck and delivery ingress/egress areas along Wilshire Boulevard, and the secondary ingress/egress on North Cañon Drive would exhibit additional truck traffic than under existing conditions, with trucks carrying materials on- and off-site, and work crews and construction equipment moving around the site. Additional construction staging for this alternative may occur on the parcel directly adjacent and to the west of the current Section 2 project construction staging yard.

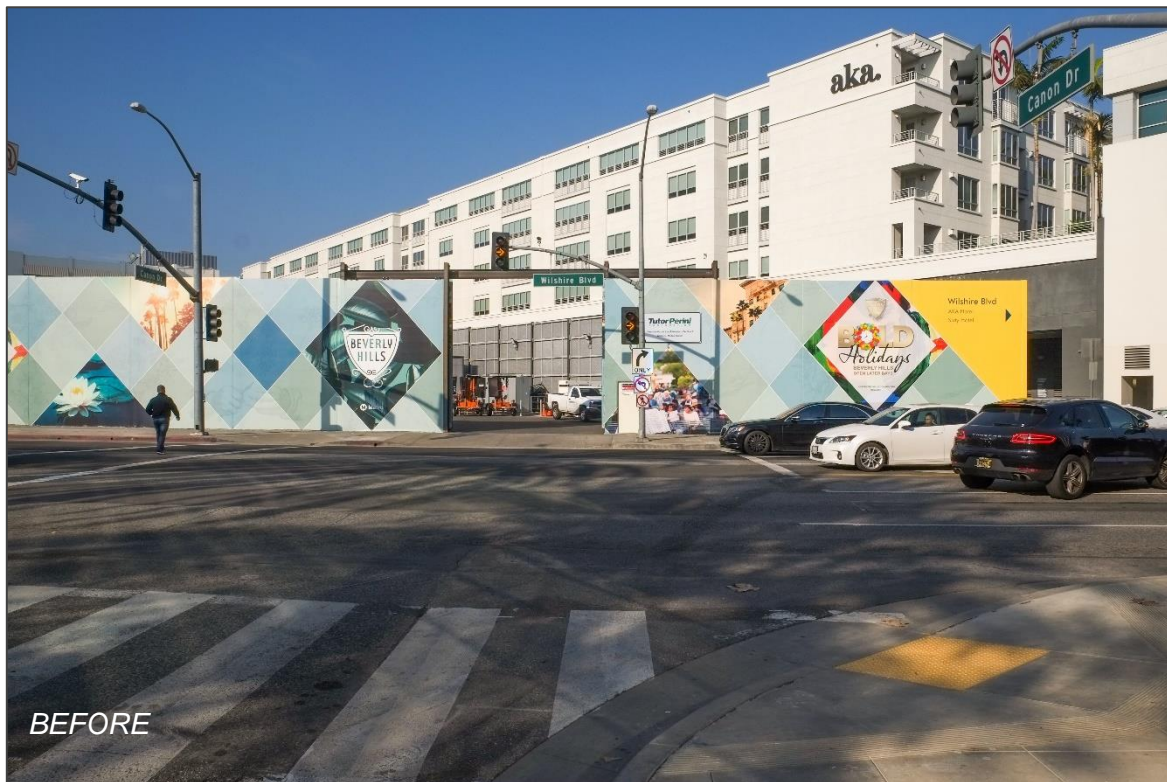
Passing motorists would primarily experience views of construction activities while driving along the roadways adjacent to the Cañon Drive Staging Yard Alternative site, including primarily Wilshire Boulevard as well as North Cañon Drive. In addition, motorists would have prolonged views while idling at the various traffic signals surrounding the site. The change in the visual character of the site during the construction phase would be noticed by passing motorists. However, passing motorists are considered to have a low sensitivity to any visual changes on the site as they are likely passing through the area to reach their destinations and do not necessarily have a personal investment in the visual character of the site.

The patrons and employees of commercial and other land uses in the area would primarily experience views of the construction activities on the Cañon Drive Staging Yard Alternative site as they approach and leave their commercial destination or place of work. Therefore, their views of the construction activities would primarily take place while en route to and from these locations in the adjacent area. These land uses would include the Coldwell Banker Real Estate office building, Torrey Pines Bank offices, AKA Beverly Hills Hotel, and other offices and commercial businesses. The employees of adjacent area land uses would not be highly sensitive to visual changes occurring on the Cañon Drive Staging Yard Alternative site during the construction phase. In addition, patrons of adjacent area land uses may be more sensitive than the employees, but nevertheless would not likely change their patronage due to visual changes taking place on the Cañon Drive Staging Yard Alternative site during the construction phase. A temporary impact to the visual character would result for area patrons and employees, a viewer group that would be moderately sensitive to visual changes but have less of a personal investment in the visual appearance of the site.

Overall, the construction phase would represent a nominal change in the visual quality and character of the Cañon Drive Staging Yard Alternative site because the site is currently utilized as a construction staging yard. However, the construction site would be visibly similar to other construction projects in the City and urban areas. During construction, the site may potentially stand out as a memorable or remarkable feature in the landscape due to its temporary negative impact on the visual character and quality of the site and its surroundings. However, the construction impact would be temporary and reversible. Therefore, construction impacts related to visual character would be less than significant.

Operational Impacts

The Cañon Drive Staging Yard Alternative would be located within an urban environment and would be consistent with the City's General Plan goals to protect scenic views and vistas, including urban views in the City. To assess the potential visual changes that would result from the operation of the Cañon Drive Staging Yard Alternative, two KOPs were selected specifically for this alternative as shown below. Visual simulations from these KOPs were prepared to provide a before and after comparison of the visual effects that would result from the Cañon Drive Staging Yard Alternative. The locations of the KOPs are shown above on Figure 3.1-1. The KOP existing views and simulations for the Cañon Drive Staging Yard Alternative are shown on Figure 3.1-8 and Figure 3.1-9.



**Figure 3.1-8 KOP 7 – Before and After Simulation View,
Looking North from Wilshire Boulevard at South Canon Drive**



**Figure 3.1-9 KOP 8 – Before and After Simulation View,
Looking West along Wilshire Boulevard at Alley**

The KOPs are representative of direct views within the Project site and area; simulations from the same locations show how these views would change as a result of the implementation of the Cañon Drive Staging Yard Alternative. The simulated views represent conceptual design and are not intended to represent the final project design. The simulations are included to conceptually illustrate the general visual changes that would be expected to occur with the Cañon Drive Staging Yard Alternative. However, the simulations do not include all design elements discussed in the text of this section and do not represent the final design of the Cañon Drive Staging Yard Alternative.

KOP 7 shows the Cañon Drive Staging Yard Alternative site looking north from the public sidewalk at the southeast corner of the intersection of Wilshire Boulevard and South Cañon Drive (see Figure 3.1-8). The view includes the existing Section 2 project staging yard with colorful temporary site perimeter construction barriers or walls. The background of the view includes the up to six-story AKA Beverly Hills Hotel, which is separated from the site by an alley that runs in a southeast to northwest orientation. An additional multi-story building is visible in the background on the left side of the view. This is a view typically seen by patrons and employees of the office buildings, commercial businesses in the adjacent area, and commuters and pedestrians, including tourists. Existing standard street lighting is visible on the north side of Wilshire Boulevard, adjacent to the alternative site.

As shown on Figure 3.1-8, the new approximately one-story-tall Cañon Drive Staging Yard Alternative is located on the Section 2 project staging yard site. In addition, an approximately 52-foot-tall ventilation shaft is visible on the southeastern portion of the site. From KOP 7, the primary visual change related to the new portal includes a larger modern transparent exterior with a large canopy structure above, as well as the taller ventilation shaft. The new elevators, stairways, and escalators are visible through the translucent glass exterior. The new portal would not block views of any existing elements of visual interest. However, the ventilation shaft does represent a taller new feature that would be noticed by viewers. Despite the dense urban and visual environment of Wilshire Boulevard and the adjacent area, including various types of structures and architectural styles, this visual change related to the ventilation shaft could be substantial. The final design, types, and colors of the external materials used would be in coordination with Metro and with local entities as applicable to ensure that the visual character of the Cañon Drive Staging Yard Alternative would be consistent with the existing visual character along Wilshire Boulevard. In addition, the implementation of Mitigation Measure AES-A would require public art, or other visual or architectural features to be implemented on the ventilation shaft to ensure the structure would be visually consistent with the existing environment. With the implementation of Mitigation Measure AES-A, operational impacts related to visual character would be less than significant.

KOP 8 shows the Cañon Drive Staging Yard Alternative site looking west from along the public sidewalk on the north side of Wilshire Boulevard (see Figure 3.1-9). Located on the right and in the foreground of this view is an alley and a small portion of the AKA Beverly Hills Hotel. The middleground of the view includes the existing Section 2 project staging yard with colorful temporary site perimeter construction barriers or walls, as well as the Wilshire Boulevard public ROW. The background of the view includes the Wilshire Boulevard commercial corridor with several multi-level office buildings and hotels. This is a view typically seen by patrons and employees of the office buildings, commercial businesses in the adjacent area and commuters and pedestrians, including tourists. Existing standard street lighting is visible on both sides of Wilshire Boulevard, and mature trees are visible on the Rolex office building property on the south side of the street.

As shown on Figure 3.1-9, the new approximately one-story-tall Cañon Drive Staging Yard Alternative is located on the Section 2 project staging yard site. From KOP 8, the primary visual change related to the new northern portal includes a larger modern transparent exterior with a large canopy structure above. In addition, an approximately 52-foot-tall ventilation shaft is visible in the foreground on the southeastern portion of the site. The new portal would not block views of any existing elements of visual interest. However, the ventilation shaft does represent a taller new feature that would be noticed by viewers. Despite the dense urban and visual environment of Wilshire Boulevard and the adjacent area, including various types of structures and architectural styles, this visual change related to the ventilation shaft could be substantial. The final design, types, and colors of the external materials used would be in coordination with Metro and with local entities as applicable to ensure that the visual character of the Cañon Drive Staging Yard Alternative would be consistent with the existing visual character along Wilshire Boulevard. In addition, the implementation of Mitigation Measure AES-A would require public art, or other visual or architectural features to be implemented on the ventilation shaft to ensure the structure would be visually consistent with the existing environment. With the implementation of Mitigation Measure AES-A, operational impacts related to visual character would be less than significant.

Overall, the operations of the Cañon Drive Staging Yard Alternative would represent a change in visual character as compared to the existing alternative site. However, the adjacent area currently has a mix of architectural styles and building materials and colors, as well as a mix of modern and traditional style buildings. Viewers including pedestrians, commuters, and patrons and employees of adjacent area commercial businesses and offices would have a low to moderate sensitivity to the visual change and would have less of a personal investment in the visual appearance of the alternative site. In addition, as the above analysis has shown, this alternative would be consistent with the City's General Plan goals to protect scenic views and vistas, including urban views in the City. The implementation of Mitigation Measure AES-A would require public art, or other visual or architectural features to be implemented on the ventilation shaft to ensure the structure would be visually consistent with the existing environment. The operations of the Cañon Drive Staging Yard Alternative, therefore, would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. As a result, the Cañon Drive Staging Yard Alternative would not conflict with zoning and other regulations governing scenic quality discussed in Section 3.1.1 above. This alternative would be designed to comply with applicable zoning regulations related to structure height, setbacks, and other similar elements. In addition, the Cañon Drive Staging Yard Alternative would not conflict with the applicable policies within the City of Beverly Hills General Plan Open Space Element because this alternative would not substantially change views in the area. Therefore, with the implementation of Mitigation Measure AES-A, operational impacts related to visual character would be less than significant.

Impact AES-4. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Therefore, no impacts would occur related to the creation of a new source

of substantial light or glare that would adversely affect day or nighttime views in the area beyond those previously analyzed in the Purple Line Extension EIR.

The Project and Project Alternatives

Construction Impacts

A significant impact would occur if the Project or Project Alternatives caused a substantial increase in ambient illumination levels beyond the property line or caused new lighting to spill-over onto light-sensitive land uses such as residences, some commercial and institutional uses that require minimum illumination for proper function, and natural areas.

The Project and Project Alternative sites are currently illuminated by existing adjacent standard street lights and pedestrian-level lighting. Due to the densely developed commercial nature of the RSA, a high level of existing ambient lighting currently exists in the RSA.

Construction of the Project and Project Alternatives would occasionally involve nighttime construction activities, which would require nighttime construction lighting. Nighttime construction lighting, including limited amounts of glare, could spill over onto the hotel uses, which are located adjacent to the Project and Project Alternatives. Because the hotels include sleeping quarters, they would be considered light-sensitive. All applicable City regulations and lighting specification requirements would be implemented with regard to nighttime construction lighting required for the Project and Project Alternatives. However, to ensure that nighttime construction lighting does not spill over onto light-sensitive uses, Mitigation Measure AES-B would be implemented. This measure would prevent light spillover by shielding the light fixtures and directing the light downward toward the interior of the construction site. With implementation of Mitigation Measure AES-B, construction impacts related to the creation of a substantial source of light or glare that would result in adverse effects to daytime/nighttime views of the area would be less than significant.

Operational Impacts

The Project and Project Alternatives would include installation of new standard exterior and interior security lighting around and within the new station portal, which would operate regularly. The nighttime lighting fixtures that would be installed would direct the majority of the light to within and directly adjacent to the portal, and away from sensitive areas, to the maximum extent feasible. Compliance with applicable City regulations related to light and glare would ensure less than significant impacts. In addition, the RSA is highly urbanized and has a high level of existing lighting. Therefore, operational impacts related to the creation of a substantial source of light or glare that would result in adverse effects to daytime/nighttime views of the area would be less than significant.

3.1.5 Mitigation Measures

Cañon Drive Staging Yard Alternative

AES-A: For the Cañon Drive Staging Yard Alternative, Metro and/or the City shall implement public art, or other visual or architectural features on the exterior surfaces of the ventilation shaft required for the Cañon Drive Staging Yard Alternative in order to ensure this structure would be consistent with other station

designs and the visual environment of this portion of the Wilshire Corridor in the City.

Project and Project Alternatives

AES-B: During nighttime construction activities lighting, including “down lighting,” shall be directed toward the interior of the construction staging area and shall be shielded so that it would not spill over into adjacent light-sensitive areas.

3.1.6 Impacts After Mitigation

Based on the analysis presented above regarding anticipated effects of the Cañon Drive Staging Yard Alternative, significant impacts related to operational visual character could occur. However, with implementation of Mitigation Measure AES-A, impacts to visual character would be less than significant.

Based on the analysis presented above regarding anticipated effects of the Project and Project Alternatives, significant impacts related to construction nighttime lighting could occur. However, with implementation of Mitigation Measure AES-B, impacts to lighting and glare would be less than significant.

3.1.7 Cumulative Impacts

No Project Alternative

Related projects identified within approximately 1 mile of the Project and Project Alternatives generally include commercial and residential construction or expansion. Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. The No Project Alternative would not have cumulatively considerable impacts related to aesthetics and visual quality.

The Project and Project Alternatives

Construction Impacts

Related projects identified within approximately 1 mile of the Project and Project Alternatives generally include commercial and residential construction or expansion, as well as the Wilshire/Rodeo Station as part of the Purple Line Extension Project. A majority of the related projects are not within the line-of-sight of the Project and Project Alternatives sites. Also, the aboveground features of the Wilshire/Rodeo Station would not be located adjacent to the Project and Project Alternatives. The Project and Project Alternatives would have less than significant construction impacts related to vistas, protected views, and visual character. It is possible that nighttime construction lighting may be used by the Project or Project Alternatives and the Metro Purple Line construction concurrently. However, all local lighting regulations and standards would apply. With implementation of Mitigation Measure AES-B, the Project and Project Alternatives would ensure lighting and glare impacts during nighttime construction

activities are less than significant. Therefore, the Project and Project Alternatives would not have cumulatively considerable construction impacts related to aesthetics and visual quality.

Operational Impacts

Related projects identified within approximately 1 mile of the Project and Project Alternatives generally include commercial and residential construction or expansion, as well as the Wilshire/Rodeo Station as part of the Purple Line Extension Project. A majority of the related projects are not within the line-of-sight of the Project and Project Alternatives sites. Also, the aboveground features of the Wilshire/Rodeo Station would not be located adjacent to the Project and Project Alternatives. The Project and Cañon Drive-Half Portal Alternative would have less than significant operational impacts related to aesthetics and visual quality. The potentially significant visual character effect of the ventilation shaft as part of the Cañon Drive Staging Yard Alternative would be reduced with the implementation of Mitigation Measure AES-A which would require public art, or other visual or architectural features to be implemented. Therefore, the Project and Project Alternatives would not have cumulatively considerable operational impacts related to aesthetics and visual quality.

3.2 Air Quality

This section describes the existing air quality conditions of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative sites and surrounding area and potential air quality impacts resulting from their implementation. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. This evaluation includes the potential for the Project and Project Alternatives to conflict with or obstruct implementation of the applicable air quality plan, to result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment, to expose sensitive receptors to substantial pollutant concentrations, and to result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Air quality in the South Coast Air Basin (SCAB) is regulated by the United States Environmental Protection Agency (USEPA), California Air Resources Board (ARB), and South Coast Air Quality Management District (SCAQMD). Each of these agencies develops rules, regulations, or policies, and/or goals to attain the directives imposed through legislation. Although USEPA air quality regulations may not be superseded, both state and local regulations may be more stringent (USEPA 2020).

3.2.1 Regulatory Setting

Federal

Clean Air Act

USEPA's air quality mandates are drawn primarily from the federal Clean Air Act (CAA; [42 U.S.C. § 7401]), which was enacted in 1970 and amended in 1977 and 1990 (CAA Amendments). The CAA requires USEPA to establish the National Ambient Air Quality Standards (NAAQS). NAAQS have been established for six major air pollutants: ozone, carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), lead, and particulate matter (PM). PM is subdivided into two classes based on particle size: PM equal to or less than 10 micrometers in diameter (PM₁₀) and PM equal to or less than 2.5 micrometers in diameter (PM_{2.5}). The CAA identifies two types of NAAQS. Primary standards provide public health protection, including protecting the health of "sensitive" populations such as asthmatics, children, and the elderly. Secondary standards provide public welfare protection, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings. Because the NAAQS for these air pollutants are regulated using human health and environmentally based criteria, they are commonly referred to as "criteria air pollutants" (USEPA 2018a). The NAAQS are summarized in Table 3.2-1. The discussion below defines each criteria pollutant, identifies major sources, and describes health effects associated with exposure.

Ozone. Ozone is the principal component of smog and is formed in the atmosphere through a series of reactions involving reactive organic gases (ROGs) or volatile organic compounds (VOC), and nitrogen oxides (NO_x) in the presence of sunlight. ROGs/VOC and NO_x are called precursors of ozone. NO_x includes various combinations of nitrogen and oxygen, including nitric oxide (NO), NO₂, and others. Significant ozone concentrations are usually produced only in the summer, when atmospheric inversions are greatest and temperatures are high. ROG/VOC and NO_x emissions are considered critical in ozone formation.

Individuals exercising outdoors; children; and people with preexisting lung disease, such as asthma and chronic pulmonary lung disease, are considered the most susceptible sub-groups for ozone effects. Short-term exposure (lasting for a few hours) to ozone can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in sports and live in communities with high ozone levels.

Carbon Monoxide. CO is a colorless and odorless gas that, in the urban environment, is associated primarily with the incomplete combustion of fossil fuels in motor vehicles. Relatively high concentrations are typically found near crowded intersections and along heavily used roadways carrying slow-moving traffic. Even under most severe meteorological and traffic conditions, high concentrations of CO are limited to locations within a relatively short distance (300 to 600 feet) of heavily traveled roadways. Vehicle traffic emissions can cause localized CO impacts, and severe vehicle congestion at major signalized intersections can generate elevated CO levels, called “hot spots,” which can be hazardous to human receptors adjacent to the intersections. Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of decreased oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen transport. Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include fetuses, patients with diseases involving heart and blood vessels, and patients with chronic hypoxemia (oxygen deficiency) as seen at high altitudes.

Nitrogen Dioxide. NO₂ is a product of combustion and is generated in vehicles and in stationary sources, such as power plants and boilers. It is also formed when ozone reacts with NO in the atmosphere. As noted above, NO₂ is part of the NO_x family and is a principal contributor to ozone and smog generation. Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children, is associated with long-term exposure to NO₂ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Airway contraction and increased resistance to air flow are observed after short-term exposure to NO₂ in healthy subjects. Larger decreases in lung function are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

Sulfur Dioxide. SO₂ is a combustion product, with the primary source being power plants and heavy industries that use coal or oil as fuel. SO₂ is also a product of diesel engine combustion. SO₂ in the atmosphere contributes to the formation of acid rain. SO₂ can irritate lung tissue and increase the risk of acute and chronic respiratory disease. In asthmatics, increased resistance to air flow and a reduction in breathing capacity leading to severe breathing difficulties are observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂. Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate the effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically, or one pollutant alone is the predominant factor.

Lead. Lead is a highly toxic metal that may cause a range of human health effects. Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. In adults, increased lead levels are associated with increased blood pressure. Lead poisoning can cause anemia, lethargy, seizures, and death, although it appears that there are no direct effects of lead on the respiratory system. Previously, the lead used in gasoline anti-knock additives represented a major source of lead emissions to the atmosphere from mobile and industrial sources. USEPA began working to reduce lead emissions soon after its inception, issuing the first reduction standards in 1973. In 1975, unleaded gasoline was introduced for motor vehicles equipped with catalytic converters. USEPA banned the use of leaded gasoline in highway vehicles in December 1995. As a result of USEPA's regulatory efforts to remove lead from gasoline, emissions of lead from the transportation sector and levels of lead in the air decreased dramatically.

Particulate Matter. PM is a complex mixture of extremely small particles that consists of dry solid fragments, solid cores with liquid coatings, and small liquid droplets. PM is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, soot, and soil or dust particles. Natural sources of PM include windblown dust and ocean spray. The size of PM is directly linked to the potential for causing health problems. USEPA is concerned about particles that are 10 micrometers in diameter or smaller, because these particles generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects. Health studies have shown a significant association between exposure to PM and premature death. Other important effects include aggravation of respiratory and cardiovascular disease, lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems, such as heart attacks and irregular heartbeat (USEPA 2016). Individuals particularly sensitive to fine particle exposure include older adults, people with heart and lung disease, and children. A consistent correlation between elevated PM levels and an increase in mortality rates, respiratory infections, number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life-span, and an increased mortality from lung cancer. USEPA groups PM into two categories, which are described below.

PM₁₀. PM₁₀ includes both fine and coarse dust particles; the fine particles are PM_{2.5}. Coarse particles, such as those found near roadways and dust-producing industries, are larger than 2.5 micrometers and smaller than 10 micrometers in diameter. Sources of coarse particles include crushing or grinding operations and dust from paved or unpaved roads. Control of PM₁₀ is primarily achieved through the control of dust at construction and industrial sites, the cleaning of paved roads, and the wetting or paving of frequently used unpaved roads.

PM_{2.5}. Fine particles, such as those found in smoke and haze, are PM_{2.5}. Sources of fine particles include all types of combustion activities (motor vehicles, power plants, wood burning, etc.) and certain industrial processes. PM_{2.5} is also formed through reactions of gases, such as SO₂ and NO_x, in the atmosphere. PM_{2.5} is the major cause of reduced visibility (haze) in California.

The CAA requires each state with regions that have not attained the NAAQS to prepare a State Implementation Plan (SIP), detailing how these standards are to be met in each local area. The SIP is a legal agreement between each state and the federal government to commit resources

to improving air quality. It serves as the template for conducting regional and project-level air quality analysis. The SIP is not a single document, but a compilation of new and previously submitted attainment plans, emissions reduction programs, district rules, state regulations, and federal controls.

The CAA Amendments of 1977 and 1990 also require that states and local air quality agencies develop a Title V Operating Permit Program, which requires all “major sources” of pollutants to obtain Title V permits. The program is designed to ensure compliance with all applicable requirements of the CAA and to enhance USEPA’s ability to enforce the CAA. Air pollution sources subject to the program must obtain an operating permit; states must develop and implement the program; and USEPA must issue permit program regulations, review each state’s proposed program, and oversee the state’s efforts to implement any approved program.

Nonroad Sources and Emission Standards

Before 1994, there were no standards to limit the amount of emissions from off-road equipment. In 1994, USEPA established emission standards for hydrocarbons, NO_x, CO, and PM to regulate new pieces of off-road equipment. These emission standards came to be known as Tier 1. This rule was issued under the authority in Section 213 of the CAA. Since that time, increasingly more stringent Tier 2, Tier 3, and Tier 4 (interim and final) standards were adopted by USEPA, as well as by ARB. Tier 1 emission standards became effective in 1996. The more stringent Tier 2 and Tier 3 emission standards became effective between 2001 and 2008, with the effective date dependent on engine horsepower. Tier 4 interim standards became effective between 2008 and 2012, and Tier 4 final standards became effective in 2014 and 2015. Each adopted emission standard was phased in over time. New engines built in and after 2015 across all horsepower sizes must meet Tier 4 final emission standards. In other words, new manufactured engines cannot exceed the emissions established for Tier 4 final emissions standards (USEPA 2018b).

Regulations for On-road Vehicles and Engines

USEPA also has certain regulations for on-road vehicles and engines, including passenger vehicles, commercial trucks and buses, and motorcycles (USEPA 2017a). In 2001, USEPA issued a Final Rule on Controlling Emissions of Hazardous Air Pollutants from Mobile Sources. This rule was issued under the authority in Section 202 of the CAA. Passenger cars and trucks are regulated by USEPA under “light-duty” vehicle programs. USEPA regulates passenger vehicles to reduce the amount of harmful emissions. There are regulations for multiple aspects of passenger vehicles, including standards for exhaust and evaporative emissions; control of hazardous air pollutants and air toxics; National Low Emission Vehicle Program; CAP 2000 (Compliance Assurance Program); onboard refueling vapor recovery; and inspection and maintenance.

Safer Affordable Fuel Efficient Vehicle Rule

In September 2019, the National Highway Traffic Safety Agency (NHTSA) and USEPA published the Safer Affordable Fuel Efficient (SAFE) Vehicle Rule Part One: One National Program. The SAFE Part One Rule revokes California’s authority and vehicle waiver to set its own emissions standards and set zero emission vehicle mandates in California for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. In November 2019, California and 23 other states filed a suit against USEPA over the vehicle waiver revocation. During the period the federal action is in effect, ARB will administer the

affected portions of its program on a voluntary basis. Finalization of the SAFE Vehicles Rule Part Two is anticipated in 2020.

State

ARB is the lead agency responsible for developing the SIP in California. Local air districts and other agencies prepare air quality attainment plans or air quality management plans, and submit them to ARB for review, approval, and incorporation into the applicable SIP.

California Clean Air Act

ARB is also responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA). The CCAA was adopted in 1988 and requires ARB to establish California Ambient Air Quality Standards (CAAQS). In most cases, CAAQS are more stringent than NAAQS. The CAAQS are summarized in Table 3.2-1.

Table 3.2-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ^a	National Standards ^b	
		Concentration ^c	Primary ^{c,d}	Secondary ^{c,e}
Ozone ^l	1 hour	0.09 ppm (180 µg/m ³)	–	Same as primary standard
	8 hours	0.070 ppm (137 µg/m ³)	0.070 ppm (137 µg/m ³)	
Respirable particulate matter (PM ₁₀) ^f	24 hours	50 µg/m ³	150 µg/m ³	Same as primary standard
	Annual arithmetic mean	20 µg/m ³	–	
Fine particulate matter (PM _{2.5}) ^f	24 hours	–	35 µg/m ³	Same as primary standard
	Annual arithmetic mean	12 µg/m ³	12 µg/m ³	15 µg/m
Carbon monoxide (CO)	8 hours	9.0 ppm (10 mg/m ³)	9 ppm (10 mg/m ³)	None
	1 hour	20 ppm (23 mg/m ³)	35 ppm (40 mg/m ³)	
	8 hours (Lake Tahoe)	6 ppm (7 mg/m ³)	–	–
Nitrogen dioxide (NO ₂) ^g	Annual arithmetic mean	0.030 ppm (57 µg/m ³)	0.053 ppm (100 µg/m ³)	Same as primary standard
	1 hour	0.18 ppm (339 µg/m ³)	100 ppb (188 µg/m ³)	None
Sulfur dioxide (SO ₂) ^h	Annual arithmetic mean	–	0.030 ppm (for certain areas) ^h	–
	24 hours	0.04 ppm (105 µg/m ³)	0.14 ppm (for certain areas) ^h	–
	3 hours	–	–	0.5 ppm (1,300 µg/m ³)
	1 hour	0.25 ppm (655 µg/m ³)	75 ppb (196 µg/m ³)	–

Table 3.2-1 National and California Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards ^a	National Standards ^b	
		Concentration ^c	Primary ^{c,d}	Secondary ^{c,e}
Lead ^{ij}	30-day average	1.5 µg/m ³	—	—
	Calendar quarter	—	1.5 µg/m ³ (for certain areas) ^j	Same as primary standard
	Rolling 3-month average	—	0.15 µg/m ³	
Visibility-reducing particles ^k	8 hours	See footnote j	No national standards	
Sulfates	24 hours	25 µg/m ³		
Hydrogen sulfide	1 hour	0.03 ppm (42 µg/m ³)		
Vinyl chloride ⁱ	24 hours	0.01 ppm (26 µg/m ³)		

Notes: mg/m³ = milligrams per cubic meter; ppb = parts per billion; ppm = parts per million; µg/m³ = micrograms per cubic meter

^aCalifornia standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1- and 24-hour), nitrogen dioxide, and particulate matter (PM₁₀, PM_{2.5}, and visibility-reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

^bNational standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over 3 years, is equal to or less than the standard. For PM₁₀, the 24-hour is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m³ is equal to or less than 1. For PM_{2.5}, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standards.

^cConcentration expressed first in the units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25 degrees Celsius and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and reference pressure of 760 torr; (ppm) in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

^dNational Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

^eNational Secondary Standards: The levels of air quality necessary to protect public welfare from any known or anticipated adverse effects of a pollutant.

^fOn December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 µg/m³ to 12.0 µg/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 µg/m³, as was the annual secondary standard of 15 µg/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 µg/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

^gTo attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. California standards are in units of ppm. To directly compare the national 1-hour standard to the California standards the units can be converted from 100 ppb to 0.100 ppm.

^hOn June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until 1 year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved. To directly compare the 1-hour national standard to the California standard, the units can be converted to ppm. In this case, the national standard of 75 ppb is identical of 0.075 ppm.

ⁱARB has identified lead and vinyl chloride as toxic air contaminants with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

^jThe national standard for lead was revised on October 15, 2008, to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until 1 year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standards are approved.

^kIn 1989, ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and the "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

^lOn October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.

Source: ARB 2016

Other ARB responsibilities include, but are not limited to, overseeing local air district compliance with state and federal laws; approving local air quality plans; submitting SIPs to USEPA; monitoring air quality; determining and updating area designations and maps; and setting emission standards for new mobile sources, consumer products, small utility engines, off-road vehicles, and fuels. ARB maintains air quality monitoring stations throughout the state in conjunction with local air districts. Data collected at these stations are used by ARB to classify air basins as being in attainment or nonattainment with respect to each pollutant and to monitor progress in attaining air quality standards.

California Health and Safety Code Section 40914

The CCAA requires that each area exceeding the CAAQS for ozone, CO, SO₂, and NO₂ develop a plan aimed at achieving those standards. California Health and Safety Code Section 40914 requires air districts to design a plan that achieves an annual reduction in district-wide emissions of 5 percent or more, averaged every consecutive 3-year period. To satisfy this requirement, the local air districts have to develop and implement air pollution reduction measures, which are described in their air quality attainment plans, and outline strategies for achieving the CAAQS for any criteria pollutants for which the region is classified as nonattainment.

In-Use Off-Road Diesel Vehicle Regulation, On-Road Light-Duty Certification, and California Reformulated Gasoline Program

ARB has established emission standards for vehicles sold in California and for various types of equipment. California gasoline specifications are governed by both state and federal agencies. During the past decade, federal and state agencies have imposed numerous requirements on the production and sale of gasoline in California. ARB has also adopted control measures for diesel PM and more stringent emissions standards for various on-road mobile sources of emissions, including transit buses and off-road diesel equipment (e.g., tractors, generators).

Tanner Air Toxics Act and the Air Toxics Hot Spots Information and Assessment Act

In addition to criteria pollutants, both federal and state air quality regulations also focus on toxic air contaminants (TACs). TACs in California are regulated primarily through the Tanner Air Toxics Act (Chapter 1047, Statutes of 1983) and the Air Toxics Hot Spots Information and Assessment Act (Chapter 1252, Statutes of 1987). Assembly Bill (AB) 1807 sets forth a formal procedure for ARB to designate substances as TACs. Research, public participation, and scientific peer review must occur before ARB can designate a substance as a TAC. The Air Toxics Hot Spots Information and Assessment Act requires that TAC emissions from stationary sources be quantified and compiled into an inventory according to criteria and guidelines developed by ARB, and if directed to do so by the local air district, a health risk assessment must be prepared to determine the potential health impacts of such emissions.

ARB adopted a Diesel Risk Reduction Plan, which recommends control measures to achieve a diesel PM reduction of 85 percent by 2020 from year 2000 levels. Recent regulations and programs include the low-sulfur diesel fuel requirement and more stringent emission standards for heavy-duty diesel trucks and off-road in-use diesel equipment. As emissions are reduced, it is expected that the risks associated with exposure to the emissions will also be reduced.

Air Quality and Land Use Guidance

ARB has developed the Air Quality and Land Use Handbook: A Community Health Perspective to provide guidance on land use compatibility with sources of TACs (ARB 2005). These sources include freeways and high-traffic roads, commercial distribution centers, rail yards, refineries, dry cleaners, gasoline stations, and industrial facilities. The handbook is not a law or adopted policy, but offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs. The handbook indicates that land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues. The recommendations relevant to a project include to avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day.

In response to new research demonstrating benefits of compact, infill development along transportation corridors, ARB released a technical supplement, Technical Advisory: Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways (Technical Advisory; ARB 2017a), to the 2005 Air Quality and Land Use Handbook. This Technical Advisory was developed to identify strategies that can be implemented to reduce exposure at specific developments or as recommendations for policy and planning documents. It is important to note that it is not intended as guidance for a specific project and does not discuss the feasibility of mitigation measures for the purposes of compliance with CEQA. Some of the strategies identified in the Technical Advisory include implementation of speed reduction mechanisms, including roundabouts, traffic signal management, speed limit reductions, design that promotes air flow and pollutant dispersion along street corridors, solid barriers, vegetation for pollutant dispersion, and indoor high efficiency filtration (ARB 2017a).

Local

In the City of Beverly Hills, the SCAQMD is the agency responsible for protecting public health and welfare through the administration of federal and state air quality laws and policies. Included in the SCAQMD's tasks are monitoring of air pollution, preparation of air quality plans, and promulgation of rules and regulations.

The SCAQMD monitors air quality within the project area and the South Coast Air Basin (SCAB), which includes Orange County and portions of Los Angeles, Riverside, and San Bernardino Counties. The SCAB is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino, and San Jacinto Mountains to the north and east; and the San Diego County line to the south.

2016 Air Quality Management Plan

The most recent Air Quality Management Plan (AQMP) was adopted by the SCAQMD in March 2017. The 2016 AQMP is the legally enforceable blueprint for how the region will meet and maintain state and federal air quality standards. The 2016 AQMP identifies strategies and control measures needed to achieve attainment of the 8-hour ozone standard and federal annual and 24-hour standards for PM_{2.5} in the SCAB (SCAQMD 2017a). The 2016 AQMP also represents a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures.

SCAQMD Rules and Regulations

SCAQMD rules relevant to the Project and Project Alternatives include, but are not limited to:

- Regulation IV: Prohibitions; Rule 401: Visible Emissions. Prohibits the generation of particulate matter emissions that exceed the visible emissions threshold.
- Regulation IV: Prohibitions; Rule 402: Nuisance. Prohibits the discharge, from any source, of such quantities of air contaminants or other materials that cause or have a tendency to cause injury, detriment, nuisance, annoyance to people and/or the public, or damage to any business or property.
- Regulation IV: Prohibitions; Rule 403: Fugitive Dust. Regulates fugitive dust emissions from any commercial construction or demolition activity capable of generating fugitive dust emissions, including active operations, open storage piles, and inactive disturbed areas, as well as track-out and carry-out onto paved roads beyond a project site.
- Regulation XI: Source Specific Standards; Rule 1113: Architectural Coatings. Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compound (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
- Regulation XIV: Toxics and Other Non-Criteria Pollutants; Rule 1403 Requires notification and work practice standards to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of asbestos-containing materials.

The Project and Project Alternatives are required to comply with these rules, and conformance would be incorporated into project specifications and procedures.

3.2.2 Methodology and CEQA Thresholds

South Coast Air Basin

By its very nature, air pollution is largely a cumulative impact. The attainment and nonattainment status of regional pollutants is a result of past and present development within the SCAB, and this regional impact is cumulative rather than being attributable to any one source. A project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future development projects.

As stated in Appendix G of the CEQA Guidelines, the significance criteria established by the applicable air quality management board or air pollution control district may be relied on to make the impact determinations for specific program elements. The SCAQMD has established recommended thresholds of significance for regional pollutant emissions. The thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. As such, the entire SCAB is the resource study area for the Project and Project Alternatives, as shown on Figure 3.2-1. The SCAQMD thresholds of significance for regional pollutant emissions were used to analyze the impacts of the Project and Project Alternatives. The significance thresholds are shown in Table 3.2-2.



Figure 3.2-1 South Coast Air Basin

Table 3.2-2 SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds		
Pollutant	Construction	Operation
NO _x ¹	100 lbs/day	55 lbs/day
VOC ¹	75 lbs/day	55 lbs/day
PM ₁₀	150 lbs/day	150 lbs/day
PM _{2.5}	55 lbs/day	55 lbs/day
SO _x	150 lbs/day	150 lbs/day
CO	550 lbs/day	550 lbs/day
Toxic Air Contaminants (TACs) and Odor Thresholds		
TACs (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to South Coast AQMD Rule 402	
Note: lbs/day = pounds per day; > = greater than Source: SCAQMD 2019a. 1 Ozone is a secondary pollutant (i.e., ozone is not directly emitted, but results from chemical reactions in atmosphere from precursor pollutants (NO _x and VOC). As such, air quality impacts associated with ozone are evaluated using thresholds identified for its precursor pollutants.		

This analysis does not directly evaluate lead because little to no quantifiable and foreseeable emissions of lead would be generated by the Project and Project Alternatives. Lead emissions have significantly decreased due to the near elimination of leaded fuel use (USEPA 2017b).

In accordance with the SCAQMD CEQA Air Quality Handbook, the criteria used to evaluate a project's consistency with the SCAQMD AQMP includes whether the project will result in an increase in the frequency or severity of existing air quality violations, or cause or contribute to new air quality violations; or whether the project will exceed the assumptions utilized in preparing the AQMP (SCAQMD 1993). The thresholds represent levels above which a project's individual emissions would result in a cumulatively considerable contribution (i.e., significant) to the SCAB's existing air quality conditions (SCAQMD 2003, 2018). Therefore, the SCAQMD regional thresholds are also a proxy for determining projects' capacity to increase the frequency or severity of existing air quality violations, or cause or contribute to new air quality violations and conflict with or obstruct an attainment plan.

The regional thresholds of significance were designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable CAAQS and NAAQS (SCAQMD 2018), which were established using health-based criteria to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution. Because regional air quality standards have been established for these criteria pollutants to

protect the public with a margin of safety from adverse health impacts due to exposure to air pollution, these thresholds of significance can also be used to assess project emissions and inform the project's impacts to regional air quality and health risks under CEQA. In addition, the SCAQMD has established localized thresholds of significance.

Localized Thresholds

Localized emissions of criteria air pollutants and precursors were assessed in accordance with the SCAQMD's local significance thresholds (LST) guidance (SCAQMD 2008). The SCAQMD recommends that lead agencies perform project-specific air quality modeling for projects larger than 5 acres. For projects less than 5 acres, the SCAQMD has developed look-up tables showing the maximum mass emissions that would not cause an exceedance of any LST for NO₂, CO, PM₁₀, and PM_{2.5} based on distance to the nearest receptor location at distances between 25 to 500 meters from the project site.

The acreage of the site would vary by the Project and Project Alternatives but is anticipated to be less than 1 acre in size. Thus, the LSTs were estimated using the look-up tables for Source Receptor Area 2 (Northwest Coastal LA County) and a conservative 1-acre project size. Receptor locations are off-site locations where persons may be exposed to the emissions from project activities. Receptor locations include residential, commercial, and industrial land use areas, and any other areas where persons can be situated for an hour or longer at a time. The surrounding area of the Project and Project Alternatives is generally occupied by commercial land uses, such as hotels, restaurants, and retail land uses. For example, the Project along Beverly Drive is bordered by the Maybourne Beverly Hills Hotel to the east and offices to the southeast, southwest, north, and west. The site for the Cañon Drive-Half Portal Alternative is immediately bordered by the restaurant and offices to the west and east. The Maybourne Beverly Hills Hotel, Opus Bank, and various real estate-related offices are located to the north. Reeves Park is a small public green space and is approximately 350 feet south of the intersection of North Cañon Drive and Wilshire Boulevard. The site for the Cañon Drive Staging Yard Alternative is also bound by offices to east and west. Hotel land uses are also located approximately 75 feet northeast and 300 feet southeast of the site.

As such, the land uses surrounding the Project and Project Alternative sites are primarily commercial. Since hotels are places where a receptor may be present for 24 hours per day, the LST analysis considers the nearest sensitive receptors to be the immediately adjacent hotels. It should be noted that this is a conservative approach, as hotel stays are typically short in duration. Since workers in the surrounding commercial land uses would typically be on-site for 8 hours per day, the LST analysis also considered the adjacent office spaces to be receptors for the pollutants with shorter averaging times (NO₂ and CO). The closest receptor distance on the mass rate LST look-up tables is 25 meters. According to SCAQMD LST guidance, projects with boundaries closer than 25 meters to the nearest receptor should use the LSTs for 25 meters. Table 3.2-3 summarizes the LSTs applicable to the Project and Project Alternatives.

The LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards and are developed based on the ambient concentrations of that pollutant for each source receptor area. Since the LSTs consider the ambient air quality, LSTs can also be used to identify those projects that would result in significant levels of air pollution and impact sensitive receptors.

Table 3.2-3 SCAQMD Localized Significance Thresholds

Pollutant	Construction- Related LST (lbs/day)
NO _x	103
CO	562
PM ₁₀	4
PM _{2.5}	3
<p>Notes: Based on 1-acre LSTs in Source Receptor Area 2 (Northwest Coastal LA County) for a 25-meter receptor distance.</p> <p>NO_x = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter with less than 10 micrometers in diameter; PM_{2.5} = particulate matter with less than 2.5 micrometers in diameter; lbs/day = pounds per day</p> <p>Source: SCAQMD 2008</p>	

Methodology

Construction

Construction-related activities are temporary, short-term sources of emissions. Sources of construction-related criteria air pollutant emissions include construction equipment exhaust; construction-related trips by workers, and delivery and hauling truck trips; fugitive dust from site preparation activities; and off-gassing from architectural coating and paving activities.

Construction-related emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 (CAPCOA 2017). CalEEMod allows the user to enter project-specific construction information, such as the construction schedule, the types and number of construction equipment, and the number and length of off-site motor vehicle trips.

Construction of the Project and Cañon Drive-Half Portal Alternative is anticipated to commence within the first quarter 2022 to the first quarter 2024, and would be completed within the third quarter 2025 to the third quarter 2026, depending on the construction contracting mechanism that is decided upon. The analysis for the Project and Cañon Drive-Half Portal Alternative assumed construction would begin in the first quarter of 2022 and last approximately 3 years. Construction of the Cañon Drive Staging Yard Alternative would commence in the first quarter of 2024 and would be completed in the third quarter 2026. Given that exhaust emissions from the construction equipment fleet are expected to decrease over time as stricter standards take effect, and advancements in engine technology, retrofits, and turnover in the equipment fleet occur, construction activities that occur in later years are anticipated to result in lower levels of emissions. It should also be noted that, because the Cañon Drive Staging Yard Alternative would have the same footprint and similar features, the analysis assumed the intensity of construction activities and construction-related emissions would also be similar.

Construction activities would be required to occur within the work hour table in the MOA between the City of Beverly Hills and Metro, which generally includes Monday through Friday, 8:00 am through 6:00 pm. Some construction equipment was assumed to operate for 16 hours per day in order to account for the occasional activities that would require work to be performed after-hours, such as piling, decking, excavation, and major concrete pouring activities. Construction assumptions were generally based on construction activities and material import and export quantities for a typical Metro station and scaled based on the footprint for the Project

and each of the Project Alternatives.¹ The Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative were assumed to have a maximum of 16, 14, and 11 workers, respectively, per day. Additionally, the analysis assumed the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative would have 12, 10, and 8 haul truck trips, respectively, per day. It was assumed there would be approximately 35,705 cubic yards (cy), 31,450 cy, and 24,050 cy of import and export material quantities associated with the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative, respectively. As described in Chapter 2 (Project Description), the analysis assumed construction activities of the Project and Project Alternatives would implement SCAQMD Rule 403 dust control measures. Additional methodology details and assumptions are provided in Appendix C of this EIR.

Operation

As discussed in Chapter 2 (Project Description), the purpose of the Project is to provide an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard, to deliver improved and convenient public access to the Beverly Hills Business Triangle. The Project is expected to improve pedestrian flow by providing more than one entrance/exit to avoid bottlenecks at peak hours as well as traffic flow by reducing the number of pedestrian crossings on Wilshire Boulevard. Because the need for the Project is to provide convenient pedestrian access to the northern side of the Wilshire/Rodeo Station, the Project is not anticipated to result in an increase in vehicle trips or vehicle miles traveled (VMT). On the contrary, the Project is anticipated to reduce trips and VMT by encouraging people to take public transit. Therefore, operational activities would be limited to area sources, which include the minor use of maintenance equipment, consumer products and cleaning supplies, and energy sources associated with electricity consumption for lighting and operation of elevators and escalators. Indirect greenhouse gas (GHG) emissions associated with energy consumption are analyzed in Section 3.7, Greenhouse Gas Emissions. It is estimated that a typical Metro station consumes approximately 51,290 kilowatt hours (kWh), or 175 million British thermal units (Btu) per year (FTA & Metro 2010). Since the Project would not construct a typical station, but rather a station portal entrance, this analysis scaled down the energy consumption based on the footprint of the Project and Project Alternatives. The analysis assumed the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative would consume approximately 9,898, 8,719, and 6,667 kWh per year, respectively.

CEQA Thresholds

An impact is considered significant if the project would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard;

¹ For purposes of the emission estimates, the analysis assumed a typical Metro station is 47,600 square feet. Based on preliminary design estimates, the analysis assumed the Project and Cañon Drive-Half Portal Alternative would be approximately 9,200 and 8,100 square feet, respectively. The Cañon Drive Staging Yard Alternative is anticipated to have a footprint of approximately 3,800 square feet. For purposes of the emission estimates, the analysis assumed the Cañon Drive Staging Yard Alternative would have a footprint of 6,200 square feet, which was based on previous preliminary design estimates. As such, the emission estimates presented for the Cañon Drive Staging Yard Alternative are conservative.

3. Expose sensitive receptors to substantial pollutant concentrations; and/or:
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

3.2.3 Existing Conditions

Air quality is defined by the concentration of pollutants in relation to their impact on human health. Concentrations of air pollutants are determined by the rate and location of pollutant emissions released by pollution sources, and the atmosphere's ability to transport and dilute such emissions. Natural factors that affect transport and dilution include terrain, wind, and sunlight. Therefore, ambient air quality conditions within the SCAB are influenced by such natural factors as topography, meteorology, and climate, in addition to the amount of air pollutant emissions released by existing air pollutant sources.

Ambient air pollutant concentrations in the SCAB are measured at air quality monitoring stations operated by ARB and the SCAQMD. The closest SCAQMD air quality monitoring station to the Project and Project Alternatives sites is the West Los Angeles - VA Hospital station, located approximately 3.3 miles west from the Project and Project Alternatives. This station monitors ozone and NO₂ concentrations. Air quality monitoring data of CO were obtained from the SCAQMD Historical Data by Year tables for the Northwest Coastal LA County source receptor area. Data for PM₁₀ were obtained from the Los Angeles-Westchester Parkway station, approximately 8 miles southwest from the Project and Project Alternatives. Data for PM_{2.5} were obtained from the Los Angeles-North Main Street station, approximately 9.8 miles east from the Project and Project Alternatives. Table 3.2-4 presents 3 years of the most recent information available, summarizing the exceedances of standards and the highest recorded pollutant. These concentrations represent the existing, or baseline conditions, for the project area, based on the most recent information that is available.

As shown in Table 3.2-4, ambient air concentrations of PM₁₀ and NO₂ did not exceed the NAAQS or CAAQS in 2016 through 2018. The 8-hour ozone and PM_{2.5} concentrations exceeded the NAAQS between 2016 and 2018.

Both USEPA and ARB use ambient air quality monitoring data to designate areas according to their attainment status for criteria air pollutants. The purpose of these designations is to identify the areas with air quality problems and initiate planning efforts for improvement. The three basic designation categories are nonattainment, attainment, and unclassified. An "attainment" designation for an area signifies that pollutant concentrations did not exceed the established standard. In contrast to attainment, a "nonattainment" designation indicates that a pollutant concentration has exceeded the established standard. Nonattainment may differ in severity. To identify the severity of the problem and the extent of planning and actions required to meet the standard, nonattainment areas are assigned a classification commensurate with the severity of their air quality problem (e.g., moderate, serious, severe, extreme). Finally, an unclassified designation indicates that insufficient data exist to determine attainment or nonattainment.

As shown in Table 3.2-5, the SCAB currently meets the NAAQS for all criteria air pollutants except ozone, and PM_{2.5} and meets the CAAQS for all criteria air pollutants except ozone, PM₁₀, and PM_{2.5}.

Table 3.2-4 Ambient Air Quality Summary

Pollutant Standards	2016	2017	2018
Ozone			
State maximum 1-hour concentration (ppm)	0.085	0.099	0.094
National maximum 8-hour concentration (ppm)	0.073	0.077	0.073
State maximum 8-hour concentration (ppm)	0.073	0.077	0.074
Number of Days Standard Exceeded			
CAAQS 1-hour (>0.09 ppm)	0	0	0
CAAQS 8- hour (>0.070 ppm)/NAAQS 8-hour(>0.070 ppm)	2/2	3/3	2/2
Carbon Monoxide (CO) a			
Maximum 8-hour concentration (ppm)	1.1	1.2	1.3
Maximum 1-hour concentration (ppm)	2.2	2.0	1.6
Nitrogen Dioxide (NO2)			
State maximum 1-hour concentration (ppb)	54.5	55.7	64.7
Annual Average (ppb)	11	*	*
Number of Days Standard Exceeded			
NAAQS 1-hour	0	0	0
CAAQS 1-hour	0	0	0
Particulate Matter (PM10)			
National maximum 24-hour concentration (µg/m3)	43.0	46.5	45.3
State maximum 24-hour concentration (µg/m3)	43.9	46.5	45.1
State annual average concentration (µg/m3)	21.9	20.2	*
Measured Number of Days Standard Exceeded			
NAAQS 24-hour (>150 µg/m3)	0	0	0
CAAQS 24-hour (>50 µg/m3)	0	0	0
Particulate Matter (PM2.5)			
National maximum 24-hour concentration (µg/m3)	44.3	54.9	61.4
State maximum 24-hour concentration (µg/m3)	49.4	61.7	65.3
National annual average concentration (µg/m3)	11.7	12.0	12.8
State annual average concentration (µg/m3)	12.0	16.3	16.0
Measured Number of Days Standard Exceeded			
NAAQS 24-hour (>35 µg/m3)	2	6	6
Notes: µg/m3 = micrograms per cubic meter; CAAQS = California Ambient Air Quality Standards; NAAQS = National Ambient Air Quality Standards; ppb = parts per billion; ppm = parts per million a Data obtained from the SCAQMD Historical Data by Year. *Insufficient data to determine the value. Source: ARB 2019a; SCAQMD 2019a			

Table 3.2-5 SCAB Attainment Designations

Pollutant	CAAQS	NAAQS
Ozone (1-hour)	Nonattainment	Nonattainment (Extreme) ¹
Ozone (8-hour)	Nonattainment	Nonattainment (Extreme)
Carbon Monoxide	Attainment	Attainment (Maintenance)
Nitrogen Dioxide	Attainment	Attainment (Maintenance)
Sulfur Dioxide	Attainment	Unclassified/Attainment
PM ₁₀	Nonattainment	Attainment (Maintenance)
PM _{2.5}	Nonattainment	Nonattainment (Serious)
Sulfates	Attainment	N/A
Hydrogen Sulfide	Attainment	N/A
Visibility Reducing Particles	Unclassified	N/A
Lead	Attainment	Nonattainment (Partial) ²
Notes: N/A = not applicable; no standard PM ₁₀ = suspended particulate matter; PM _{2.5} = fine particulate matter ¹ The federal ozone (1-hour) standard of 12 ppm was in effect from 1979 through June 15, 2005. The revoked standard is referenced here because this benchmark is addressed in State Implementation Plans. ² Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect redesignation to attainment based on current monitoring data. Source: ARB 2019b; SCAQMD 2016.		

In 2015, the SCAQMD published the Multiple Air Toxics Exposure Study IB (MATES IV), a monitoring and evaluation study conducted in the SCAB. The MATES IV consists of a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize risk across the SCAB. The study focuses on the carcinogenic risk from exposure to air toxics. The MATES IV estimated population weighted risk in the SCAB is 897 per million, a decrease of about 57 percent compared to the previous study (MATES III). The study also showed that diesel exhaust emissions had declined by about 70 percent, but diesel PM continued to account for about two-thirds of the cancer risk from air toxics (SCAQMD 2017b). MATES IV also extrapolated excess cancer risk levels throughout the SCAB by modeling specific grids. MATES IV estimates an excess cancer risk of 977 per million for the project area (SCAQMD 2015). The SCAQMD has begun the MATES V, which will include an updated emissions inventory of TACs and updated modeling effort to characterize risk across the SCAB.

3.2.4 Impact Evaluation

Impact AIR-1. Conflict with or obstruct implementation of the applicable air quality plan.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. The No Project Alternative would not conflict with the applicable air quality plan.

Therefore, no impacts would occur related to conflict with or obstruction of the implementation of the applicable air quality plan beyond those previously studied in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

Construction Impacts

As discussed in Section 3.2.1 (Regulatory Setting), the most recent air quality plan is the 2016 AQMP prepared by the SCAQMD in partnership with ARB, USEPA, and SCAG. The 2016 AQMP identifies strategies and control measures needed to achieve attainment of the 8-hour ozone standard and federal annual and 24-hour standard for PM_{2.5} in the SCAB. Consistency with the AQMP is determined through evaluation of whether a project would exceed the estimated assumptions used as the basis of the AQMP and whether a project will result in an increase in the frequency or severity of existing air quality violation or cause or contribute to new air quality violations.

Construction of the Project and Project Alternatives would involve the use of off-road equipment, haul trucks, and worker commute trips. Assumptions for off-road equipment emissions in air quality plans are developed based on hours of activity and equipment population reported to ARB for rule compliance. The emissions inventory is divided into two major source classifications: stationary and mobile sources. ARB provides emission inventories for off-road equipment, which includes construction and mining equipment, industrial and commercial equipment, and lawn and garden equipment, among other categories (SCAQMD 2017a). ARB uses a number of models to estimate emissions for various off-road equipment categories. The models combine population, equipment activity, horsepower, load factors, population growth, retirement factors, and emission factors to yield the annual emission inventory by county, air basin, or statewide. The future emission forecasts are primarily based on demographic and economic growth projections provided by SCAG. The use of construction equipment in the AQMP is estimated for the region on an annual basis using ARB inventories, and construction-related emissions are estimated as an aggregate in the AQMP. As the Project and Project Alternatives would not increase population or employment in the region, the Project and Project Alternatives would not increase the assumptions for off-road equipment use in the AQMP.²

As described in Section 2.6.11 (Construction Best Management Practices), the construction contractor would implement dust control measures per SCAQMD Rule 403. Further, as shown in Impact AIR-2 below, construction-related emissions of the Project and Project Alternatives would not exceed the thresholds of significance and would not result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new air quality violations. In addition, as described in the MOA between the City of Beverly Hills and Metro, the contractor would be required to implement Mitigation Measures AIR-A, AIR-B, and AIR-C to even further reduce emissions, dependent on which agency oversees the construction contractor. These measures would require reducing heavy equipment idling; encourage its contractors to lease new, clean equipment meeting the most stringent of applicable standards (e.g., Tier 3 or greater engine standards) or best available emissions control technologies on all

²As described in more detail in the SCAQMD 2016 AQMP, construction is an emission inventory source in the AQMP. Each emission inventory source grows based on its growth surrogate. Growth surrogates include industry output growth, employment growth, demographic growth, and others. The selection of the surrogate by which emission growth is projected depends on the type of activity. Employment growth is chosen for labor intensive sectors, such as construction (SCAQMD 2016).

equipment; and require its contractors to maintain and tune engines per manufacturer's specifications. Consistent with the goals and strategies of the AQMP (MOB-06, Retirement of Older On-Road Heavy-Duty Vehicles; and Off-Road Mobile Source Measures), these measures would decrease emissions of PM and NO_x (precursor to ozone) associated with on- and off-road heavy-duty equipment during construction activities. Therefore, with implementation of mitigation, construction activities would not conflict with the applicable air quality plan and impacts would be less than significant.

Operational Impacts

The purpose of the Project and Project Alternatives is to provide an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard, thereby delivering improved and convenient public access to the Beverly Hills Business Triangle. The Project and Project Alternatives are expected to improve pedestrian flow by providing more than one entrance/exit to avoid bottlenecks at peak hours. Because the need for the Project is to provide convenient pedestrian access to the northern side of the Wilshire/Rodeo Station, the Project and Project Alternatives are not anticipated to result in an increase in vehicle trips or VMT. Therefore, the Project and Project Alternatives would not cause an increase in population or vehicle trips beyond that considered in the 2016 AQMP. On the contrary, implementation of the Project and Project Alternatives is anticipated to reduce VMT by encouraging people to take public transit. The Project and Project Alternatives would also be consistent with AQMP Transportation Strategies, such as expanding the regional transit system and promoting active transportation (SCAQMD 2017a). Therefore, the intensity of operational emissions has been accounted for in the AQMP and would not exceed the current assumptions used to develop the AQMP. Therefore, operational impacts related to conflict with the applicable air quality plan would be less than significant.

Impact AIR-2. 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.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. The No Project Alternative would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard. Therefore, no impacts would occur related cumulatively considerable net increase of any criteria pollutant.

The Project (Beverly Drive)

Construction Impacts

Construction emissions are short term or temporary but have the potential to result in a significant impact on air quality. Construction activities for the Project would generate temporary emissions of precursors to ozone (VOC and NO_x), CO, PM₁₀, and PM_{2.5}. VOC, NO_x, and CO emissions are associated primarily with mobile equipment exhaust, including off-road construction equipment and on-road motor vehicles. Fugitive PM dust emissions are associated primarily with site preparation and travel on roads and vary as a function of parameters such as

soil silt content, soil moisture, wind speed, acreage of disturbance area, and miles traveled by construction vehicles. Earthmoving and material handling operations are the primary sources of fugitive PM dust emissions from construction activities.

Table 3.2-6 below shows the construction emissions associated with the Project compared to the SCAQMD's regional thresholds of significance.

Table 3.2-6 Project Maximum Daily Construction-Related Emissions

Year	VOC (lbs/day)	NOx (lbs/day)	CO (lbs/day)	SOx (lbs/day)	PM ₁₀ ¹ (lbs/day)	PM _{2.5} ¹ (lbs/day)
2022	2.65	28.56	26.58	0.07	8.01	2.73
2023	2.42	24.31	26.17	0.07	2.12	1.19
2024	5.62	44.45	50.46	0.13	3.56	2.15
2025	4.41	30.96	40.70	0.08	1.69	1.34
Maximum Daily Emissions	5.62	44.45	50.46	0.13	8.01	2.73
SCAQMD Regional Thresholds ²	75	100	550	150	150	55
Exceed Regional Threshold?	No	No	No	No	No	No
Notes: Modeled by AECOM in 2020. 1 Fugitive dust emission estimates of PM10 and PM2.5 include reductions associated with implementation of fugitive dust control practices per SCAQMD Rule 403. 2 SCAQMD 2019b VOC = volatile organic compounds; NOx = nitrogen oxides; CO = carbon monoxide; PM10 = particulate matter less than 10 micrometers in diameter; PM2.5 = particulate matter less than 2.5 micrometers in diameter; lbs/day = pounds per day						

SCAQMD LSTs only consider the amount of on-site emissions generated by construction activities; off-site emissions, such as haul trucks and worker commutes, are not included. Emissions associated with vehicle trips to and from the Project site during construction would be dispersed throughout the region and would have a nominal localized impact at the Project site. Table 3.2-7 presents the maximum on-site emissions for construction-related emission sources associated with the Project for comparison to the SCAQMD LSTs.

As shown in Table 3.2-6 and Table 3.2-7, the peak daily construction emissions associated with construction of the Project would not exceed any of the SCAQMD daily or LST thresholds. Therefore, construction impacts related to a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard would be less than significant.

Table 3.2-7 Project On-Site Construction Emissions

Description	NOx (lbs/day)	CO (lbs/day)	PM ₁₀ ¹ (lbs/day)	PM _{2.5} ¹ (lbs/day)
Maximum On-Site Emissions ²	38.43	46.79	1.74	1.68
SCAQMD Localized Thresholds ³	103	562	4	3
Exceed Localized Threshold?	No	No	No	No
<p>Notes: Modeled by AECOM in 2020.</p> <p>1 Fugitive dust emission estimates of PM₁₀ and PM_{2.5} include reductions associated with implementation of fugitive dust control practices per SCAQMD Rule 403.</p> <p>2 Maximum on-site emissions to occur in 2024 during the potential overlap of grading, construction, paving, and architectural coating activities.</p> <p>3 SCAQMD 2008</p> <p>NOx = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter less than 10 micrometers in diameter; PM_{2.5} = particulate matter less than 2.5 micrometers in diameter; lbs/day = pounds per day; LST = localized significance threshold</p>				

Cañon Drive-Half Portal Alternative

Similar to the Project, construction activities for the Cañon Drive-Half Portal Alternative would generate temporary emissions of precursors to ozone (VOC and NO_x), CO, PM₁₀, and PM_{2.5}. Table 3.2-8 and Table 3.2-9 present the maximum daily emissions and maximum on-site emissions compared to the SCAQMD regional and localized thresholds of significance, respectively.

As shown in Table 3.2-8 and Table 3.2-9, the peak daily construction emissions associated with construction of the Cañon Drive-Half Portal Alternative would not exceed any of the SCAQMD daily or LST thresholds. Therefore, construction impacts related to a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard would be less than significant.

Table 3.2-8 Cañon Drive-Half Portal Alternative Maximum Daily Construction-Related Emissions

Year	VOC (lbs/day)	NOx (lbs/day)	CO (lbs/day)	SOx (lbs/day)	PM ₁₀ ¹ (lbs/day)	PM _{2.5} ¹ (lbs/day)
2022	2.60	27.54	26.18	0.07	6.89	2.45
2023	2.38	23.63	25.81	0.06	1.97	1.15
2024	5.58	43.51	50.01	0.12	3.32	2.09
2025	4.40	30.68	40.61	0.08	1.66	1.33
Maximum Daily Emissions	5.58	43.51	50.01	0.12	6.89	2.45
SCAQMD Regional Thresholds ²	75	100	550	150	150	55
Exceed Regional Threshold?	No	No	No	No	No	No

Notes: Modeled by AECOM in 2020.

¹ Fugitive dust emission estimates of PM₁₀ and PM_{2.5} include reductions associated with implementation of fugitive dust control practices per SCAQMD Rule 403.

² SCAQMD 2019b

VOC = volatile organic compounds; NOx = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter less than 10 micrometers in diameter; PM_{2.5} = particulate matter less than 2.5 micrometers in diameter; lbs/day = pounds per day

Table 3.2-9 Cañon Drive-Half Portal Alternative On-Site Construction Emissions

Description	NOx (lbs/day)	CO (lbs/day)	PM ₁₀ ¹ (lbs/day)	PM _{2.5} ¹ (lbs/day)
Maximum On-Site Emissions ²	38.43	46.79	1.74	1.68
SCAQMD Localized Thresholds ³	103	562	4	3
Exceed Localized Threshold?	No	No	No	No

Notes: Modeled by AECOM in 2020.

¹ Fugitive dust emission estimates of PM₁₀ and PM_{2.5} include reductions associated with implementation of fugitive dust control practices per SCAQMD Rule 403.

² Maximum on-site emissions to occur in 2024 during the potential overlap of grading, construction, paving, and architectural coating activities.

³ SCAQMD 2008

NOx = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter less than 10 micrometers in diameter; PM_{2.5} = particulate matter less than 2.5 micrometers in diameter; lbs/day = pounds per day; LST = localized significance threshold

Cañon Drive Staging Yard Alternative

Similar to the Project and the Cañon Drive-Half Portal Alternative, construction activities for the Cañon Drive Staging Yard Alternative would generate temporary emissions of precursors to ozone (VOC and NO_x), CO, PM₁₀, and PM_{2.5}. The Cañon Drive Staging Yard Alternative is anticipated to have a footprint of approximately 3,800 square feet. For purposes of the emission estimates, the analysis assumed the Cañon Drive Staging Yard Alternative would have a footprint of 6,200 square feet, which was based on previous preliminary design estimates. As such, the emission estimates presented in Tables 3.2-10 and 3.2-11 are conservative estimates for the Cañon Drive Staging Yard Alternative.

Table 3.2-10 and Table 3.2-11 present the maximum daily emissions and maximum on-site emissions compared to the SCAQMD regional and localized thresholds of significance, respectively.

**Table 3.2-10 Cañon Drive Staging Yard Alternative
Maximum Daily Construction-Related Emissions**

Year	VOC (lbs/day)	NOx (lbs/day)	CO (lbs/day)	SOx (lbs/day)	PM ₁₀ ¹ (lbs/day)	PM _{2.5} ¹ (lbs/day)
2024	2.22	21.40	25.24	0.06	5.53	1.96
2025	2.07	19.53	25.08	0.06	1.58	0.92
2026	5.25	39.38	49.07	0.12	2.83	1.81
2027	4.38	30.38	40.43	0.08	1.63	1.33
Maximum Daily Emissions	5.24	39.38	49.07	0.12	5.53	1.96
SCAQMD Regional Thresholds ²	75	100	550	150	150	55
Exceed Regional Threshold?	No	No	No	No	No	No
Notes: Modeled by AECOM in 2020. ¹ Fugitive dust emission estimates of PM ₁₀ and PM _{2.5} include reductions associated with implementation of fugitive dust control practices per SCAQMD Rule 403. ² SCAQMD 2019b VOC = volatile organic compounds; NOx = nitrogen oxides; CO = carbon monoxide; PM ₁₀ = particulate matter less than 10 micrometers in diameter; PM _{2.5} = particulate matter less than 2.5 micrometers in diameter; lbs/day = pounds per day						

**Table 3.2-11 Cañon Drive Staging Yard Alternative
On-Site Construction Emissions**

Description	NOx (lbs/day)	CO (lbs/day)	PM ₁₀ ¹ (lbs/day)	PM _{2.5} ¹ (lbs/day)
Maximum On-Site Emissions ²	35.51	46.58	1.53	1.46
SCAQMD Localized Thresholds ³	103	562	4	3
Exceed Localized Threshold?	No	No	No	No
<p>Notes: Modeled by AECOM in 2020.</p> <p>¹ Fugitive dust emission estimates of PM₁₀ and PM_{2.5} include reductions associated with implementation of fugitive dust control practices per SCAQMD Rule 403.</p> <p>² Maximum on-site emissions to occur in 2026 during the potential overlap of grading, construction, paving, and architectural coating activities.</p> <p>³ SCAQMD 2008</p> <p>NOx = nitrogen oxides; CO = carbon monoxide; PM₁₀ = particulate matter less than 10 micrometers in diameter; PM_{2.5} = particulate matter less than 2.5 micrometers in diameter; lbs/day = pounds per day; LST = localized significance threshold</p>				

As shown in Table 3.2-10 and Table 3.2-11, the peak daily construction emissions associated with construction of the Cañon Drive Staging Yard Alternative would not exceed any of the SCAQMD daily or LST thresholds. Therefore, construction impacts related to a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard would be less than significant.

The Project and Project Alternatives

Operational Impacts

Following construction, the Project and Project Alternatives would generate emissions associated with area sources, such as the use of consumer products and minor maintenance activities. The Project and Project Alternatives are not anticipated to result in an increase in vehicle trips or VMT. On the contrary, implementation of the Project and Project Alternatives is anticipated to reduce VMT in the region by encouraging people to take public transit. Table 3.2-12 presents the minor emissions associated with operation of the Project and Project Alternatives.

Table 3.2-12 Project and Project Alternatives Operational Emissions

Project/Alternative	VOC (lbs/day)	NOx (lbs/day)	CO (lbs/day)	Sox (lbs/day)	PM₁₀ (lbs/day)	PM_{2.5} (lbs/day)
Project	0.21	0.00	<0.01	0.00	0.00	0.00
Cañon Drive-Half Portal Alternative	0.18	0.00	<0.01	0.00	0.00	0.00
Cañon Drive Staging Yard Alternative	0.15	0.00	<0.01	0.00	0.00	0.00
SCAQMD Regional Thresholds ¹	55	55	550	150	150	55
Exceed Regional Threshold?	No	No	No	No	No	No
Notes: Modeled by AECOM in 2020. ¹ SCAQMD 2019b NOx = nitrogen oxides; CO = carbon monoxide; PM10 = particulate matter less than 10 micrometers in diameter; PM2.5 = particulate matter less than 2.5 micrometers in diameter; lbs/day = pounds per day; LST = localized significance threshold						

As shown in Table 3.2-12, the operation of the Project and Project Alternatives would not exceed the established thresholds. Therefore, construction impacts related to a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard would be less than significant.

Impact AIR-3. Expose sensitive receptors to substantial pollutant concentrations.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. The No Project Alternative would not expose sensitive receptors to substantial pollutant concentrations. Therefore, no impacts would occur related to exposing sensitive receptors to substantial pollutant concentrations beyond those previously analyzed in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

Construction Impacts

Some members of the population are especially sensitive to air pollutant emissions and should be given special consideration when evaluating air quality impacts from projects. Sensitive receptors for air pollution are generally considered children, elderly, athletes, and individuals with cardiovascular and chronic respiratory diseases. For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours (SCAQMD 2008). As discussed in Section 3.2.2 (Methodology and CEQA Thresholds), the nearest receptors would be the immediately adjacent hotels and a few residences at the Montage Beverly Hills. The exact location of the residences at the Montage Beverly Hills is not known;

thus, this analysis evaluated the distance from the west and east façades of the Montage Beverly Hills to the Project and Project Alternatives sites. The west façade of the Montage Beverly Hills is approximately 55, 500, and 700 feet away from the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative, respectively. The east façade of the Montage Beverly Hills is approximately 325, 200, and 480 feet away from the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative, respectively. Residential receptors also include single-family residences to the south of the Project and Project Alternatives sites. The nearest single-family residence to the Project is approximately 580 feet southeast of the Project site. The nearest single-family residence to the Cañon Drive-Half Portal Alternative is approximately 315 feet to the south. The nearest single-family residence to the Cañon Drive Staging Yard Alternative is approximately 280 feet to the south. Multi-family residences are also approximately 290 feet northeast of the Cañon Drive Staging Yard Alternative site.

As shown in Table 3.2-6, Table 3.2-8 and Table 3.2-10, construction-related activities of the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative would result in emissions of criteria air pollutants, but at levels that would not exceed the SCAQMD regional thresholds of significance. The regional thresholds of significance were designed to identify those projects that would result in significant levels of air pollution and to assist the region in attaining the applicable state and federal ambient air quality standards, which were established using health-based criteria to protect the public with a margin of safety from adverse health impacts due to exposure to air pollution. In addition, the LSTs represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable NAAQS and CAAQS and are developed based on the ambient concentrations of that pollutant for each source receptor area. The nearest receptors of localized emissions would be the nearby hotel and commercial land uses. As shown in Table 3.2-7, Table 3.2-9, and Table 3.2-11, the localized emissions of the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative would not exceed the SCAQMD LST analysis. As such, the criteria air pollutant emissions associated with the Project and Project Alternatives would not expose receptors to substantial criteria pollutant concentrations.

In addition to criteria air pollutants, USEPA and ARB regulate hazardous air pollutants, also known as TACs. The greatest potential for TAC emissions during construction would be related to diesel PM emissions associated with heavy-duty equipment operations. The Office of Environmental Health Hazard Assessment (OEHHA) developed a Guidance Manual for Preparation of Health Risk Assessments (OEHHA 2015). According to OEHHA methodology, health effects from carcinogenic TACs are usually described in terms of individual cancer risk, which is based on a 30-year lifetime exposure to TACs. Construction activities for the Project and Project Alternatives are anticipated to last approximately 3 years.

As discussed previously, the nearest receptors to the Project and Project Alternatives sites would be hotel guests at the adjacent hotels and a few residences at the Montage Beverly Hills. However, hotel stays are typically short in duration and would not be appropriate land uses to analyze individual cancer risk, which is based on a 30-year lifetime exposure to TACs. Concentrations of mobile source diesel PM emissions are typically reduced by 70 percent at a distance of approximately 500 feet from freeways, which are continuous emission sources, and an 80 percent decrease at 1,000 feet from distribution centers (ARB 2005). Studies also indicate that diesel PM emissions and the relative health risk can decrease substantially within 300 feet (ARB 2005; Zhu et al. 2002). As discussed previously, the nearest residential sensitive receptors are between approximately 280 and 580 feet from the Project and Project Alternatives. The Montage Beverly Hills also houses a few residences. As described above, at

the closest distance (the west façade), the Montage Beverly Hills would be approximately 55 to 700 feet from the Project and Project Alternatives. However, because off-road, heavy-duty equipment would be used for a relatively short time period, would move across the Project and Project Alternatives sites, and would not be in the immediate proximity of the residential receptors for extended periods of time, construction activities are not anticipated to expose sensitive receptors to substantial TAC concentrations.

In addition, emissions from construction equipment would occur intermittently throughout the day and would not occur as a constant plume of emissions from the Project and Project Alternatives sites. In addition, TAC emission exposure would also be reduced with implementation of mitigation measures in the MOA between the City of Beverly Hills and Metro. Mitigation Measures AIR-A through AIR-D would require the contractor to limit unnecessary idling; maintain and tune engines per manufacturer's specifications; encourage contractors to lease new, clean equipment meeting the most stringent of applicable federal or state standards, such as Tier 3 or greater engine standards; and place construction equipment away from sensitive receptors and fresh air intakes to buildings and air conditioners. Off-road construction equipment with Tier 3 and Tier 4 engines would typically result in an additional 13 to 92 percent reduction in exhaust PM emissions from the use of Tier 2 equipment, depending on the horsepower of the equipment (CAPCOA 2017). As such, due to the construction phasing schedule, distance to the nearest sensitive receptors, dispersive nature of diesel PM emissions, and implementation of the mitigation measures in the MOA, construction activities would not expose sensitive receptors to substantial pollutant concentrations. Therefore, with implementation of mitigation, construction impacts related to exposing sensitive receptors to substantial pollutant concentrations would be less than significant.

Operational Impacts

As discussed previously, following construction, the Project and Project Alternatives would not be a substantial source of TAC emissions. Operation of the Project is anticipated to reduce VMT in the project area, which would reduce TAC emissions. Operational activities would be limited to infrequent maintenance activities and electricity consumption associated with lighting, escalators, and elevators. Therefore, the Project and Project Alternatives would not result in a substantial increase in TAC emissions beyond existing conditions. The Project and Project Alternatives would not expose sensitive receptors to substantial pollutant concentrations. Therefore, operational impacts related to exposing sensitive receptors to substantial pollutant concentrations would be less than significant.

Impact AIR-4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. The No Project Alternative would not result in other emissions, such as those leading to odors. Therefore, no impacts would occur related to other emissions adversely affecting a substantial number of people beyond those previously analyzed in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

The occurrence and severity of other emissions, such as those leading to odors, depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress and often generating citizen complaints to local governments and regulatory agencies. Projects with the potential to frequently expose individuals to objectionable odors are deemed to have a significant impact. Typical facilities that generate odors include wastewater treatment facilities, sanitary landfills, composting facilities, petroleum refineries, chemical manufacturing plants, and food processing facilities.

Construction Impacts

Construction activities associated with the Project and Project Alternatives could result in short-term odor emissions from diesel exhaust associated with construction equipment. However, the Project and Project Alternatives would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. In addition, consistent with the MOA between the City of Beverly Hills and Metro, the Project and Project Alternatives would implement Mitigation Measures AIR-A, AIR-B, AIR-D, and AIR-E, which are intended to further reduce other emissions, including those leading to odors. These mitigation measures would include monitoring and recording of hazardous gas levels at the worksites will be conducted; limiting unnecessary idling of heavy equipment; maintaining and tuning engines per manufacturer's specifications; and locating construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

With implementation of mitigation, the construction of the Project and Project Alternatives would not result in other emissions or odors. Therefore, construction impacts related to other emissions, such as those leading to odors, adversely affecting a substantial number of people would be less than significant.

Operational Impacts

Since the purpose of the project is to improve pedestrian access, operation of the Project and Project Alternatives would not result in other emissions beyond existing conditions. As a result, the Project and Project Alternatives would not create other emissions or objectionable odors. Therefore, operational impacts related to other emissions, such as those leading to odors, adversely affecting a substantial number of people would be less than significant.

3.2.5 Mitigation Measures

Impacts related to air quality are less than significant. As such, mitigation measures are not required to reduce significant impacts. However, as described in the MOA between the City of Beverly Hills and Metro, the contractor would be required to implement the following mitigation measures to even further reduce emissions as feasible.

Project and Project Alternatives

AIR-A: Construction contractors shall be required to not unnecessarily idle heavy equipment.

- AIR-B:** Construction contractors shall maintain and tune engines per manufacturer's specifications to perform at USEPA certification where applicable, and to perform at verified standards applicable to retrofit technologies. Construction contractors shall also be subject to periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- AIR-C:** Construction contractors shall lease new, clean equipment meeting the most stringent of applicable federal or state standards (e.g., Tier 3 or greater engine standards) or best available emissions control technologies on all equipment.
- AIR-D:** Construction equipment and staging zones shall be located away from sensitive receptors and fresh air intakes to buildings and air conditioners. In addition, equipment will be placed to minimize dust and exhaust away from outdoor areas where feasible. Refinements to construction mitigation measures may be incorporated during the final Design phase, prior to the preparation of construction bid documents.
- AIR-E:** Monitoring and recording of hazardous gas levels at the worksites shall be conducted. In areas of gassy soil conditions, hazardous gas levels in the working environment will be continually monitored and recorded.

3.2.6 Impacts after Mitigation

Implementation of Mitigation Measures AIR-A through AIR-C would further reduce construction air quality emissions below the threshold. Implementation of Mitigation Measures AIR-A through AIR-D would reduce TAC emissions exposure to sensitive receptors during construction. In addition, Mitigation Measures AIR-A, AIR-B, AIR-D, and AIR-E are intended to further reduce other emissions, including those leading to odors. With implementation of mitigation, construction air quality impacts would be less than significant.

3.2.7 Cumulative Impacts

This section describes the potential cumulative air quality impacts resulting from implementation of the Project and Project Alternatives in conjunction with past, present, and reasonably foreseeable future projects. The geographic scope for the analysis of cumulative air quality impacts is considered to be the SCAB. It is appropriate to consider the entire air basin because air emissions can travel substantial distances and are not confined by jurisdictional boundaries; rather, they are influenced by large-scale climatic and topographical features. Although some air quality emissions can be localized, such as a CO hot spot or odor, the overall consideration of cumulative air quality is typically more regional. By its very nature, air pollution is largely a cumulative impact. Cumulative projects in the vicinity of the Project and Project Alternatives and throughout the air basin would also generate construction and operational air emissions that could contribute to air quality impacts.

The cumulative analysis focuses on whether a specific project would result in a cumulatively considerable increase in emissions. The nonattainment status of regional pollutants is a result of past and present development in the SCAB, and this regional impact is cumulative rather than attributable to any one source. A project's emissions may be individually limited, but cumulatively considerable when taken in combination with past, present, and future

development projects. The thresholds of significance are relevant to whether a project's individual emissions would result in a cumulatively considerable incremental contribution to the existing cumulative air quality conditions. If a project's emissions would be less than those threshold levels, the project would not be expected to result in a considerable incremental contribution to the significant cumulative impact (SCAQMD 2003, 2018).

No Project Alternative

Related projects identified within approximately one-mile of the Project and Project Alternatives generally include commercial and residential construction or expansion. Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to air quality were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulatively considerable impact related to air quality.

The Project and Project Alternatives

Construction Impacts

Construction-related emissions of the Project and Project Alternatives would not exceed the regional or localized SCAQMD thresholds of significance. These thresholds are designed to identify those projects that would result in significant levels of air pollution, and to assist the region in attaining the applicable NAAQS and CAAQS. As outlined in the SCAQMD White Paper on Regulatory Options for Addressing Cumulative Impacts, the thresholds represent levels above which a project's individual emissions would result in a cumulatively considerable contribution (i.e., significant) to the SCAB's existing air quality conditions (SCAQMD 2003, 2018). Therefore, projects that would not exceed the thresholds of significance would not contribute a considerable amount of criteria air pollutant emissions to the region's emissions profile and would not impede attainment and maintenance of ambient air quality standards. Therefore, the Project and Project Alternatives would not contribute to a cumulatively considerable construction impact related to air quality.

Operational Impacts

As discussed previously, following construction, the Project and Project Alternatives would not result in a substantial increase in operational emissions. Operation of the Project and Project Alternatives is anticipated to reduce VMT, which would reduce mobile source emissions in the SCAB, consistent with SCAQMD 2016 AQMP measures. Operational activities would be limited to infrequent maintenance activities and electricity consumption associated with lighting, escalators, and elevators. As shown in Table 3.2-12, the Project and Project Alternatives would result in emissions that would not exceed the SCAQMD thresholds of significance. Therefore, the Project and Project Alternatives would not contribute to a cumulatively considerable operational impact related to air quality.

3.3 Biological Resources

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to biological resources. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. The section describes the affected environment and analyzes the environmental consequences of the Project and Project Alternatives and, if applicable, provides mitigation measures.

3.3.1 Regulatory Setting

Federal

Federal Endangered Species Act (16 U.S.C. 1531–1543)

The U.S. Fish and Wildlife Service (USFWS) and National Oceanic and Atmospheric Administration (NOAA) Fisheries oversee the Federal Endangered Species Act (FESA). The USFWS has jurisdiction over plants, wildlife, and resident fish; NOAA Fisheries has jurisdiction over anadromous fish, marine fish, and marine mammals.

Sections 9 and 4(d) of the FESA prohibit the “take” of any fish or wildlife species listed as endangered or threatened, including the destruction of habitat that could hinder species recovery. The FESA defines take as, “to harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect listed animal species, or attempt to engage in such conduct.” Section 9’s take prohibition of the FESA applies to wildlife and fish species. Section 9 also prohibits the removal, possession, damage, or destruction of any endangered plant from federal lands. Section 9 further prohibits acts to remove, cut, dig up, damage, or destroy an endangered plant species in non-federal areas in knowing violation of any state law or in the course of criminal trespass.

Section 7 of the FESA mandates that all federal agencies consult with the USFWS and/or NOAA Fisheries to ensure that federal agencies’ actions do not jeopardize the continued existence of a listed species or adversely modify critical habitat for listed species. If there will be direct, indirect, or both, alterations to critical habitat that appreciably diminish the value of critical habitat for both the survival and recovery of a species, the adverse modification will require a formal consultation with the USFWS or NOAA Fisheries.

Section 10(a)(1)(B) of the FESA permits the “incidental take” of listed species. “Incidental take” is defined by the FESA as take that is incidental to, and not for the purpose of, carrying out an otherwise lawful activity. To obtain a take permit, an applicant must submit a Habitat Conservation Plan (HCP) outlining what will be done to minimize and mitigate the impact of the permitted take on the listed species. The underlying principle of Section 10 exemption from the FESA is that some individuals of a species or portions of their habitat may be expendable over the short term, as long as enough protection is provided to ensure the long-term recovery of the species.

A federally endangered species is a species of invertebrate, plant, or wildlife formally listed under the FESA as facing extinction throughout all or a significant portion of its geographic range. A federally threatened species is one formally listed by the USFWS as likely to become endangered within the foreseeable future throughout all or a significant portion of its range. A

proposed threatened or endangered species is one officially proposed by the USFWS for addition to the federal threatened or endangered species lists. Candidate species and species that are proposed for listing receive no protection under the FESA.

The Project and Project Alternatives compliance with the FESA is described further in Section 3.3.3.

Migratory Bird Treaty Act (MBTA)

Congress passed the MBTA in 1918 to prohibit the kill or transport of native migratory birds, or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA (U.S.C. Title 16, Chapter 7, Subchapter II, Sections 703–712). All birds, except European starlings; English house sparrows; rock doves (pigeons); and non-migratory game birds such as quail, pheasant, and grouse are protected under the MBTA. Game birds are regulated under state hunting permit programs.

The Project's and Project Alternatives' compliance with the MBTA is described further in Section 3.3.3.

Clean Water Act Sections 404 and 401 (33 U.S.C. 1251-1376)

The U.S. Army Corps of Engineers (USACE) and the U.S. Environmental Protection Agency (USEPA) regulate the discharge of dredged or fill material into "waters of the U.S.," including wetlands, under Section 404 of the Clean Water Act (CWA). The USACE has defined the term "wetlands" as follows: "Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstance do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas" (40 Code of Federal Regulations [CFR] 116.3). Some classes of fill activities may be authorized under general permits if specific conditions are met. Projects that would result in the placement of dredged or fill material into waters of the U.S. (WoUS) require a Section 404 permit from the USACE.

Section 401 of the CWA requires the issuance of a water quality certification or waiver thereof for all Section 404 nationwide or individual permits issued by the USACE. The USEPA has deferred water quality certification authority to the State Water Resources Control Board (SWRCB). Most projects are regulated by Regional Water Quality Control Boards (RWQCBs). The SWRCB directly regulates multi-regional projects and supports and coordinates the program statewide.

The Project's and Project Alternatives' compliance with the CWA is described further in Section 3.3.3.

State

California Fish and Game Code (CFGC)

California Endangered Species Act (Section 2050 et seq.)

California implemented its own Endangered Species Act (CESA) in 1984. The state act prohibits the take of state-listed endangered and threatened species; however, unlike the federal definition, habitat destruction or modification is not included in the state's definition of a take. Section 2090 of CESA requires state agencies to comply with endangered species protection

and recovery and to promote conservation of these species. The California Department of Fish and Wildlife (CDFW) administers the CESA and authorizes take through Section 2081 agreements (except for designated “fully protected species”).

CESA considers an endangered species one whose prospects of survival and reproduction are in immediate jeopardy; a threatened species is one present in such small numbers throughout its range that it is considered likely to become an endangered species in the near future in the absence of special protection or management; and a species is one present in such small numbers throughout its range that it may become endangered if its present environment worsens. The designation of species applies only to California native plants. State threatened and endangered species include both plants and wildlife, not invertebrates, and are legally protected against take as defined in CESA (CFGF Section 2050 et seq.).

California Species of Special Concern (SSC) is an informal designation used by the CDFW for specific declining fish, amphibian, reptile, bird, and mammal species that are not listed as endangered, threatened, or under CESA. Other species are on a CDFW Watch List (WL), while other species in California for which there is conservation concern are tracked in the California Natural Diversity Database (CNDDB). These designations do not provide legal protection but signify that these species are recognized as vulnerable by CDFW and may receive special consideration during a CEQA review process.

CDFW further classifies some species as “Fully Protected,” including “Protected birds” (CDFW Code §3511), “Protected mammals” (CDFW Code §4700), “Protected amphibians” (CDFW Code §5050 and Chapter 5, §41), “Protected reptiles” (CDFW Code §5050 and Chapter 5, §42), and “Protected fish” (CDFW Code §5515). The designation “Protected” indicates that a species may not be taken or possessed except under special permit from CDFW; “Fully Protected” indicates that a species can be taken for scientific purposes by permit only (CDFW 2019a). CDFW Codes §3503, §3505, and §3800 prohibit the take, destruction, or possession of any bird, nest, or egg of any bird except English house sparrows and European starlings unless express authorization is obtained from CDFW.

Regarding listed and endangered plant species, the CESA defers to the California Native Plant Protection Act (NPPA) of 1977. The NPPA prohibits the importing of and endangered plants into California, and the taking and selling of and endangered plants. The CESA includes an additional listing category for threatened plants that are not regulated under the NPPA. In this case, plants listed as or endangered under the NPPA are not protected under CESA but can be protected under CEQA. In addition, plants that are not state listed but meet the state standards for listing, are also protected under CEQA (Guidelines, Section 15380). In practice, this is generally interpreted to mean that all species on Lists 1B and 2 of the California Native Plant Society (CNPS) Inventory of and Endangered Plants (CNPS 2020) qualify for protection under CEQA, as well as some species of plants included on Lists 3 and 4 of the CNPS.

Bird Protections

CFGF Sections 3503, 3503.5, and 3505 set forth limits on take, possession, and destruction of certain avian species, and their nests and eggs. Section 3503 of the CFGF prohibits destruction of the nests or eggs of most native resident and migratory bird species. Section 3503.5 specifically prohibits the taking of raptors or destruction of their nests or eggs. CFGF 3511(a)(1) establishes that fully-protected birds may not be taken or possessed at any time with the exception of permits granted for scientific research.

Under these sections of the CFGC, the project proponent is not allowed to conduct activities that would result in the taking, possessing, or destroying of any birds-of-prey; taking or possessing of any migratory non-game bird as designated in the MBTA or the taking, possessing, or needlessly destroying of the nest or eggs of any raptors or non-game birds protected by the MBTA; or the taking of any non-game bird pursuant to CFGC Section 3800.

Lake and Streambed Alteration Agreement Program (Section 1600 et seq.)

CFGC Sections 1600–1617 (Lake and Streambed Alteration Agreement Program) require consultation with CDFW if a proposed activity has the potential to detrimentally affect a stream and, thereby, wildlife resources that depend on a stream for continued viability. All streams present on a proposed project site must be identified to characterize the potential for adverse project-related impacts on the stream and associated wildlife. Under CFGC Sections 1600 et seq., CDFW regulates activities that would result in (1) any potential detrimental impacts associated with the substantial diversion or the obstruction of the natural flow of a stream; (2) substantial changes to the bed, channel, or banks of a stream, or the use of any material from the bed, channel, or banks; and (3) the disposal of debris or waste materials that may pass into a stream. CDFW jurisdiction can only be applied once stream presence is identified and a project design is developed to a level of detail adequate to perform impact analysis.

Per informal guidance and current practice, CDFW may assert its jurisdiction under CFGC Sections 1600 et seq. over activities in stream features laterally to the top of the bank, or to the outer edge of the riparian vegetation (also called the “drip line”), whichever is wider. CDFW jurisdiction may also extend to the limits of the 100-year floodplain. Isolated, “non-streambed” wetlands are typically not regulated by CDFW. Riparian habitat and wetlands are additional resources that may be regulated by CDFW.

Riparian habitat refers to areas within and adjacent to rivers, streams, and creeks that support plant species adapted to (or that can tolerate) occasional or permanent flooding and/or saturated soils. Riparian habitat may include areas within the jurisdiction of the USACE and/or CDFW. Typically, USACE jurisdictional areas are much smaller than CDFW jurisdictional areas, and lateral extent may vary according to watershed position, water availability, and other factors. Unique attributes include hydrologic interaction (both laterally and longitudinally) and distinct geomorphic features (e.g., bankfull channel, floodplain, terrace).

The Project’s and Project Alternatives’ compliance with CFGC is described further in Section 3.3.3.

Porter-Cologne Water Quality Control Act

Section 13263 of the 1969 Porter-Cologne Water Quality Control Act authorizes the RWQCB to regulate discharges of waste and fill material to waters of the State (WoS), including isolated waters and wetlands. The California Water Code Section 13050(e) defines WoS separately and uniquely from the federal definition as “...any surface water or groundwater, including saline waters, within the boundaries of the State.” The state definition places no limitation on the size of stream flow as is implicitly the case for the WoUS.

The term “waters of the State” applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes within the state of California, including wetland and/or riparian vegetation and fish and wildlife resources. This designation includes isolated, depressional wetlands, and vernal pools. WoS are regulated by the SWRCB and RWQCBs.

The Project's and Project Alternatives' compliance with this act is described further in Section 3.3.3.

California Environmental Quality Act (CEQA)

CEQA requires that biological resources be considered when assessing the environmental impacts resulting from proposed actions. CEQA does not specifically define what constitutes an "adverse effect" on a biological resource. Instead, lead agencies are charged with determining what specifically should be considered an impact.

Natural Community Conservation Plan/Habitat Conservation Plan Programs

The CDFW's Natural Community Conservation Planning (NCCP) Program promotes collaborative planning efforts designed to provide for the region-wide conservation of plants, animals, and their habitats, while allowing for compatible and appropriate economic activity. Similarly, and generally in parallel, the USFWS implements the HCP program, which involves planning documents required as part of an application for an incidental take permit. These plans describe the anticipated effects of the proposed take; how those impacts will be minimized or mitigated; and how the HCP is to be funded. HCPs can apply to both listed and non-listed species, including those that are candidates or have been proposed for listing. Conserving species before they are in danger of extinction or are likely to become so can also provide early benefits and prevent the need for listing.

A review of adopted HCP and NCCP areas occurring in California was conducted to determine if the project Biological Study Area (BSA) falls within the boundary of such plans utilizing an online CDFW review process (CDFW 2019b). Results of the review indicate the BSA does not fall within the boundary of such plans. As discussed below in Section 3.3.2, the BSA includes the footprints of the Project and Project Alternatives plus a 500-foot survey buffer around each of them.

Local

Significant Ecological Area Program

Los Angeles County first began to inventory biotic resources and identify important areas of biological diversity in the 1970s. Today, the primary mechanism used by the County to conserve biological diversity is a planning overlay called Significant Ecological Areas (SEAs) designated in the County's General Plan Conservation/Open Space Element. SEAs are ecologically important land and water systems that support valuable habitat for plants and animals, often integral to the preservation of, threatened, or endangered species and the conservation of biological diversity in Los Angeles County. While SEAs are not preserves, they are areas where Los Angeles County deems it important to facilitate a balance between development and resource conservation.

Together, the General Plan overlays and a SEA conditional use permit (CUP) process are referred to as the SEA Program. The SEA Program, through goals and policies of the General Plan and the SEA ordinance (Title 22 Zoning Regulations, Section 22.56.215) help guide development within SEAs. The SEA ordinance establishes the permitting, design standards, and review process for development within SEAs, and permits are reviewed by the SEA Technical Advisory Committee (SEATAC). Development activities in the SEAs are reviewed closely in order to conserve water and biological resources such as streams, oak woodlands, and threatened or endangered species and their habitat.

A review of the Los Angeles Department of Regional Planning's SEA and Coastal Resource Areas Policy Map (LADRP 2019) indicates that the Project and Project Alternatives do not fall within the boundary of a SEA.

City of Beverly Hills Tree Protection Ordinance

The City of Beverly Hills enacted a tree protection ordinance in 1993, which prohibits the removal of a "heritage tree," defined as any tree with a trunk circumference of more than 48 inches, without a permit. A permit would also be required for the removal of smaller trees of 16 species native to the area if the trees are in the front yard of a property. Large groves of trees anywhere on the property of a single-family home are similarly protected. The ordinance does not apply to the Hillside District, a section north of Sunset Boulevard that is regulated separately, or to commercial and multi-family developments, which are regulated by formal City commission reviews.

Tree removal conducted as part of the Project and Project Alternatives would fall under formal City Planning Commission review; however, no heritage or other native tree protected by City ordinance occurs within the BSA.

City of Beverly Hills General Plan – Open Space Element

The City of Beverly Hills General Plan, amended on January 12, 2010, provides a comprehensive framework that guides the City's development through 2025. The Open Space Element (City 2010) is the principal guide for the maintenance and conservation of natural resources, open space, and recreation and park lands in the City of Beverly Hills. The following goals and policies from the Open Space Elements are applicable to biological resources.

Goal OS 1: Natural and Open Space Protection

To protect, enhance, and expand open space resources, remaining natural areas, and significant wildlife and vegetation in the City as integral parts of a sustainable environment within a larger regional ecosystem.

OS 1.1 Resource Protection. Preserve the City's biological diversity, remaining natural habitat and aesthetic character. Encourage new development on hillsides and in canyon areas to preserve natural land formations and native vegetation, and to set aside areas as greenbelts and wildlife corridors when feasible. (Imp. 2.1, 2.2)

Goal OS 2: Urban Forest

Management of the City's urban forest as an environmental, economic, and aesthetic resource to maintain the unique character of the City and the quality of life of its residents.

OS 2.1 Trees of Significance. Require the retention of trees of significance (such as heritage trees) by promoting stewardship of such trees and ensuring that the design of development and reuse projects provide for the retention of these trees wherever possible. Where tree removal cannot be avoided, require replacements with an appropriate species. (Imp. 3.8)

OS 2.2. Manage and Enhance. Continue to ensure that new construction incorporates trees where appropriate, and manages and cares for all publicly owned trees, works to

retain healthy trees, and encourages planting appropriate species in appropriate locations. Maintain Tree City USA accreditation on an annual basis. (Imp 3.8)

OS 2.4 Viability of Commercial Corridors. Balance the desire for street trees along commercial corridors with the need for clearance and visibility, including selection of tree species with appropriate canopies. (Imp. 3.8)

Goal OS 6: Visual Resource Protection

Maintenance and protection of significant visual resources and aesthetics that define the City.

OS 6.4 Minimize Removal of Existing Resources. Require new commercial, office, and residential development to minimize the removal of mature trees and other significant visual resources present on the site. (Imp. 2.1, 2.2, 3.8)

3.3.2 Methodology and CEQA Thresholds

Biological Study Area

The BSA includes the footprints of the Project and Project Alternatives plus a 500-foot survey buffer around each of them. A buffer around the Project and Project Alternatives was evaluated in order to capture potential indirect effects to biological resources from implementation of the Project. Indirect effects could include elevated noise and dust levels, soil compaction, and increased human activity within the BSA. A 500-foot survey buffer is standard for capturing potential indirect impacts from a project on biological resources. It is anticipated that indirect impacts beyond 500 feet would be diffused and would not significantly impact biological resources.

Methodology

To determine the impacts to biological resources, existing data on special-status species and sensitive natural communities were evaluated. The following agency resources were reviewed to provide a list of regional special-status species and sensitive natural communities and are identified in the impact evaluation below:

- CDFW California Natural Diversity Database (CNDDB)
- CNPS Inventory of and Endangered Plants
- USFWS Information for Planning and Conservation (IPaC)

The Project and Project Alternatives were analyzed for compliance or consistency with applicable regulations that function to conserve and protect biological resources. Biological resources may be either directly or indirectly impacted by a project. Direct and indirect impacts may be either permanent or temporary in nature. These impact categories are defined below.

Direct: Any alteration, physical disturbance, or destruction of biological resources that would result from project-related activities is considered a direct impact. Examples include clearing vegetation, loss of individual species and/or their habitats, and encroaching into wetlands or a river.

Indirect: As a result of project-related activities, biological resources may also be affected in a manner that is ancillary to physical impacts. Examples include elevated noise and dust levels,

soil compaction, increased human activity, decreased water quality, and the introduction of invasive wildlife (domestic cats and dogs) and plants.

Permanent: All impacts that result in the long-term or irreversible removal of biological resources are considered permanent. Examples include constructing a building or permanent road on an area containing biological resources.

Temporary: Any impacts considered to have reversible impacts on biological resources can be viewed as temporary. Examples include the generation of fugitive dust during construction, or removing vegetation for the preparation of construction activities, and either allowing the natural vegetation to recolonize or actively revegetating impacted areas. Surface disturbance that removes vegetation and disturbs the soil is considered a long-term temporary impact because of slow natural recovery in arid ecosystems.

Where a potentially significant impact would be anticipated, proposed mitigation measures to address these potential effects were developed.

CEQA Thresholds

An impact is considered significant if the project would:

1. 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 Wildlife or U.S. Fish and Wildlife Service;
2. 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 Wildlife or U.S. Fish and Wildlife Service;
3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means;
4. 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;
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; and/or
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

3.3.3 Existing Conditions

The Project and Project Alternatives occur within a commercial district in the City of Beverly Hills, primarily within the public right-of-way (ROW), which consists of impermeable roadways and sidewalks. The nearest areas with significant native habitats occur over 3 miles to the north-northwest in the Santa Monica Mountains. The Project and Project Alternatives lie at approximately 230 feet above mean sea level (amsl).

Vegetation Communities and Plants

Vegetation communities are assemblages of plant species that commonly coexist. The classification of vegetation communities is based on the life form of the dominant species within that community and the associated species. No native plant communities occur within or adjacent to the BSA. A few non-native ornamental tree species common in urban Los Angeles County occur in the BSA and adjacent to it, including:

- Three queen palm (*Syagrus romanzoffiana*) and three pink trumpet (*Handroanthus impetiginosus*) trees occur in sidewalk tree wells along the west side of North Cañon Drive, some with ornamental shrubs around the base of the tree;
- Ten Mexican fan palm trees occur in wells along the north side of Wilshire Boulevard, adjacent and east of the Cañon Drive Staging Yard;
- Three Mexican fan palm trees, some with ornamental flowers around their base, and three gold medallion (*Cassia leptophylla*) trees occur in wells along the east side of North Beverly Drive.

None of the trees listed above are protected under the Beverly Hills tree protection ordinance.

Special-Status Plant Species

Special-status plant species include those listed as endangered, threatened, or rare or those species proposed for listing (Candidates) by the USFWS (Title 50 CFR 17.11 and 17.12), CDFW (Title 14 California Code of Regulations 670.5), and the CNPS (CFGC Section 1900 et seq). A list of regional special-status plant species was obtained to evaluate the potential for such species to occur in the BSA by conducting a review of the CNDDDB (CDFW 2020), the CNPS's Inventory of and Endangered Plants (CNPS 2020), and the USFWS's online IPaC review process (USFWS 2020). A total of 61 plant species were identified during reviews of the CNDDDB and CNPS on-line inventories to have historically been recorded from the Beverly Hills and surrounding seven quadrangles, and from a search of IPaC for the BSA, including 14 federally and/or state-listed species, or candidates for listing. Results of the CNDDDB, CNPS, and IPaC reviews are included in Appendix D of this EIR.

Due to the urban developed setting of the Project and Project Alternatives, the BSA does not provide the specific habitat requirements to support special-status plant species. Additionally, as mentioned in Section 3.3.1, no heritage or other native trees protected by City ordinance occur within the BSA.

Wildlife

Wildlife species expected to occur in the BSA include primarily bird species that are common in and adapted to urban environments, such as band-tailed pigeon (*Patagioenas fasciata*), rock dove (*Columba livia*), American crow (*Corvus brachyrhynchos*), mourning dove (*Zenaidura macroura*), house sparrow (*Passer domesticus*), song sparrow (*Melospiza melodia*), black phoebe (*Sayornis nigricans*), and western gull (*Larus occidentalis*). Additionally, raptors such as red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*B. lineatus*), turkey vulture (*Carthartes aura*), great-horned owl (*Bubo virginianus*), and other owl species are often common in urban Los Angeles County.

Reptiles such as alligator lizard (*Elgaria multicarinata*) and western fence lizard (*Sceloporus occidentalis*) are known to exist within Los Angeles County; however, due to the urban developed nature of the BSA and surrounding areas, no reptiles or mammals, amphibians, invertebrates, or fish species are anticipated to occur in the BSA.

Special-Status Wildlife Species

Special-status wildlife species include those listed by the USFWS under the FESA and by CDFW under CESA. USFWS and CDFW officially list species as either threatened, endangered, or as candidates for listing. Additional species receive federal protection under the MBTA, and state protection under the CFGC and CEQA Section 15380(d). A list of regional special-status wildlife species was obtained by conducting a review of the CNDDDB for the Beverly Hills and surrounding seven quadrangles, and from a search of IPaC for the BSA. A total of 55 wildlife species were identified during a review of the CNDDDB (CDFW 2020) to have historically been recorded from the Beverly Hills and surrounding seven quadrangles, and from a search of IPaC (USFWS 2020) for the BSA, including 16 federally and/or state-listed species, or candidates for listing. Results of the CNDDDB and IPaC reviews are included in Appendix D of this EIR. Due to the urban developed setting of the Project and Project Alternatives, the BSA does not provide the specific habitat requirements to support special-status wildlife species.

Sensitive Natural Communities

Sensitive natural communities are those that are designated as in the region by the CDFW (2019c), support special-status plant or wildlife species, or receive regulatory protection (i.e., Section 404 of the CWA and/or Sections 1600 et seq. of the CFGC). communities are given the highest inventory priority. A list of regional sensitive natural communities was obtained by conducting a review of the CNDDDB for the Beverly Hills and surrounding seven quadrangles. A total of seven sensitive vegetative communities were identified. Results of the CNDDDB review are included in Appendix D of this EIR. None of the communities identified during the CNDDDB review occur within the BSA. Most are known from 3 plus miles to the north and northeast of the project, in the Santa Monica Mountains.

Additionally, following a review of the BSA on the Beverly Hills quadrangle and on aerial imagery, and a review of the USFWS National Wetlands Inventory database (USFWS 2019), it was determined that no aquatic communities (i.e., wetlands or other waters) under regulatory jurisdiction of the USACE, CDFW, and/or RWQCB occur within the BSA.

Wildlife Corridor

In an urban context, a wildlife migration corridor can be defined as a linear landscape feature of sufficient width and buffer to allow animal movement between two comparatively undisturbed habitat fragments, or between a habitat fragment and some vital resource that encourages population growth and diversity. Habitat fragments are isolated patches of habitat separated by otherwise foreign or inhospitable areas, such as urban tracts or highways. Two types of wildlife migration corridors seen in urban settings are regional corridors, defined as those linking two or more large areas of natural open space, and local corridors, defined as those allowing resident wildlife to access critical resources (food, cover, and water) in a smaller area that might otherwise be isolated by urban development.

The Project and Project Alternatives occur in an urbanized area and the BSA does not occur within or intersect a recognized/established regional wildlife corridor. Ornamental trees within

and adjacent to the BSA provide some opportunities for cover, resting, foraging, and nesting to localized bird populations; however, they do not provide functions as a significant wildlife movement corridor.

3.3.4 Impact Evaluation

Impact BIO-1. 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 Wildlife or U.S. Fish and Wildlife Service

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to special-status species or their habitats would occur.

The Project (Beverly Drive)

Construction Impacts

Construction of the Project would require utility relocations, piling, dewatering, and excavation, which could result in special-status plant and wildlife species being trampled, injured, or killed. However, due to the urban developed nature of the BSA, habitat for special-status species is absent and none are expected to occur within the BSA and surrounding area. As a result, no direct impacts to special-status plant and wildlife species would occur.

Indirect impacts to special-status plant species occurring outside the footprints of the Project could occur from construction-related habitat loss and modification of sensitive natural communities related to dust and stormwater runoff, and through the potential spread of noxious and invasive plant species into these communities. However, no habitat potentially suitable for special-status plant species occurs in areas surrounding the Project and Project Alternatives and they are not expected to occur in the surrounding area. As a result, no indirect impacts to special-status plant species would occur.

Four ornamental trees located on the west side of Beverly Drive would require relocation within the site, but one ornamental tree would be permanently removed and potentially relocated elsewhere in the area as feasible. None of these ornamental trees are protected under the Beverly Hills tree protection ordinance and impacts to non-native ornamental vegetation are not considered significant. However, by implementing and adhering to avoidance and minimization measures provided in Mitigation Measure BIO-A, the direct impacts of tree removal and construction on nesting birds that could utilize ornamental trees in the BSA and surrounding area would be less than significant.

Indirect impacts to bird species protected by the MBTA and CFGC within the BSA could occur during construction of the Project as a result of noise, dust, increased human presence, and vibrations resulting from construction activities. Disturbances related to construction could result in increased nestling mortality due to nest abandonment or decreased feeding frequency. Therefore, indirect impacts would be considered significant. By implementing and adhering to

construction BMPs regarding dust control (see Section 2.6.11 in Chapter 2, Project Description) and the avoidance and minimization measures outlined in Mitigation Measure BIO-A, indirect impacts to nesting birds would be less than significant.

Operational Impacts

The Project site is located primarily within the public ROW, which includes impermeable roadways and sidewalks. Only ornamental vegetation occurs in the BSA and special-status species are not expected to occur in the BSA due to a lack of suitable habitat. With implementation of the Project, conditions would not change from those present prior to and after Project construction. As a result, impacts related to vegetation and special-status species during operation and routine maintenance would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

Similar to construction of the Project, construction of the Cañon Drive-Half Portal Alternative would require utility relocations, piling, dewatering, and excavation, which could result in special-status plant and wildlife species being trampled, injured, or killed. However, due to the urban developed nature of the BSA, habitat for special-status species is absent and none are expected to occur within the BSA and surrounding area. As a result, no direct impacts to special-status plant and wildlife species would occur.

Indirect impacts to special-status plant species occurring outside the footprints of the Cañon Drive-Half Portal Alternative could occur from construction-related habitat loss and modification of sensitive natural communities related to dust, noise, and stormwater runoff, and through the potential spread of noxious and invasive plant species into these communities. However, no habitat potentially suitable for special-status plant species occurs in areas surrounding the Cañon Drive-Half Portal Alternative and they are not expected to occur in the surrounding area. As a result, no indirect impacts to special-status plant species would occur.

Five ornamental trees located on the west side of Cañon Drive would be permanently removed, and potentially relocated elsewhere in the area as feasible. None of these ornamental trees are protected under the Beverly Hills tree protection ordinance and impacts to non-native ornamental vegetation are not considered significant. However, by implementing and adhering to avoidance and minimization measures provided in Mitigation Measure BIO-A, the direct impacts of tree removal and construction on nesting birds or their associated habitat would be less than significant.

Indirect impacts to bird species protected by the MBTA and CFGC within the BSA could occur during construction of the Cañon Drive-Half Portal Alternative as a result of noise, dust, increased human presence, and vibrations resulting from construction activities. Disturbances related to construction could result in increased nestling mortality due to nest abandonment or decreased feeding frequency. Therefore, indirect impacts would be considered significant. By implementing and adhering to standard construction BMPs regarding dust control (see Section 2.6.11 in Chapter 2, Project Description) and the avoidance and minimization measures outlined in Mitigation Measure BIO-A, indirect impacts to nesting birds would be less than significant.

Operational Impacts

The site for the Cañon Drive-Half Portal Alternative is located primarily within the public ROW, which includes impermeable roadways and sidewalks. With implementation of the Cañon Drive-Half Portal Alternative, conditions would not change from those present prior to and after construction of this Project Alternative. As a result, no impacts to vegetation and special-status species during operation and routine maintenance would occur.

Cañon Drive Staging Yard Alternative

Construction Impacts

The Cañon Drive Staging Yard Alternative would require piling, dewatering, and excavation, which could result in special-status species being trampled, injured, or killed. However, due to the urban developed nature of the BSA, habitat for special-status plant and wildlife species is absent and none are expected to occur within the BSA and surrounding area. As a result, no direct impacts to special-status plant and wildlife species would occur.

Indirect impacts to special-status plant species occurring outside the footprint of the Cañon Drive Staging Yard Alternative could occur from construction-related habitat loss and modification of sensitive natural communities related to dust, noise, and stormwater runoff, and through the potential spread of noxious and invasive plant species into these communities. However, no habitat potentially suitable for special-status plant species occurs in areas surrounding the Cañon Drive Staging Yard Alternative and they are not expected to occur in the surrounding area. As a result, no indirect impacts to special-status plant species would occur.

There are no existing trees that would be impacted by the construction of the Cañon Drive Staging Yard Alternative. As such, there are no trees protected under the Beverly Hills tree protection ordinance and impacts to non-native ornamental vegetation are not considered significant. However, by implementing and adhering to avoidance and minimization measures provided in Mitigation Measure BIO-A, the direct impacts of construction on nesting birds or their associated habitat in the BSA would be ensured to be less than significant.

Indirect impacts to bird species protected by the MBTA and CFGC within the BSA could occur during construction of the Cañon Drive Staging Yard Alternative as a result of noise, dust, increased human presence, and vibration resulting from construction activities. Disturbances related to construction could result in increased nestling mortality due to nest abandonment or decreased feeding frequency. Therefore, indirect impacts would be considered significant. By implementing and adhering to standard construction BMPs regarding dust control (see Section 2.6.11 in Chapter 2, Project Description) and the avoidance and minimization measures outlined in Mitigation Measure BIO-A, indirect impacts to nesting birds would be less than significant.

Operational Impacts

The Cañon Drive Staging Yard Alternative site is located in the paved construction staging yard established for the Section 2 project and public ROW. With implementation of the Cañon Drive Staging Yard Alternative, conditions would not change from those present prior to and after construction of this Project Alternative. As a result, no impacts to vegetation and special-status species during operation and routine maintenance would occur.

Impact BIO-2. 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 Wildlife or U.S. Fish and Wildlife Service.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to riparian habitat or other sensitive natural communities would occur.

The Project and Project Alternatives

Construction Impacts

As described in Section 3.3.3, no sensitive natural communities designated as in the region by the CNDDDB or aquatic communities under regulatory protection (i.e., Section 404 of the CWA and/or Sections 1600 et seq. of the CFGC) occur within the BSA. As a result, no impacts to riparian habitat or other sensitive natural communities would occur during construction of the Project and Project Alternatives.

Operational Impacts

The Project is located primarily within the public ROW, which includes impermeable roadways and sidewalks. With implementation of the Project, conditions would not change from those present prior to and after Project construction. As a result, no impacts to riparian habitat or other sensitive natural communities during operation and routine maintenance of the Project and Project Alternatives would occur.

Impact BIO-3. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to federally protected wetlands as defined by Section 404 of the CWA would occur.

The Project and Project Alternatives

Construction Impacts

As described in Section 3.3.3, no federally protected wetlands as defined by Section 404 of the CWA occur within the BSA. As a result, no impacts to federally protected wetlands would occur during the construction of the Project and Project Alternatives.

Operational Impacts

The Project and Project Alternatives would include primarily impermeable areas. In addition, no federally protected wetlands as defined by Section 404 of the CWA occur within the BSA. As a result, no impacts to federally protected wetlands as defined by Section 404 of the CWA during operation and routine maintenance of the Project and Project Alternatives would occur.

Impact BIO-4. 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

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to native wildlife movement, native wildlife movement corridors, or native wildlife nursery sites would occur.

The Project and Project Alternatives

Construction Impacts

As described in Section 3.3.3, no native wildlife movement, native wildlife movement corridors, or native wildlife nursery sites occur within the BSA. As a result, no impacts to native wildlife movement, native wildlife movement corridors, or native wildlife nursery sites would occur during the construction of the Project and Project Alternatives.

Operational Impacts

The Project and Project Alternatives would primarily be located within impermeable areas. As a result, no impacts to native wildlife movement, native wildlife movement corridors, or native wildlife nursery sites during operation and routine maintenance of the Project and Project Alternatives would occur.

Impact BIO-5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No conflicts with local policies or ordinances protecting biological resources, including with the City's tree protection ordinance and Open Space Elements of the General Plan, would occur.

The Project and Project Alternatives

Construction Impacts

As described in Section 3.3.3, no biological resources protected by local policies or ordinances occur within the BSA. The trees identified for removal during construction are non-native ornamental trees that are not protected under the Beverly Hills tree protection ordinance. However, as part of the project design, the trees required to be removed during construction would be replaced. As a result, no conflicts with local policies or ordinances protecting biological resources, including with the City's tree protection ordinance and Open Space Elements of the General Plan, would occur during the construction of the Project and Project Alternatives.

Operational Impacts

No biological resources protected by local policies or ordinances occur within the BSA. In addition, the Project and Project Alternatives would be located primarily within impermeable areas. As a result, no conflicts with local policies or ordinances protecting biological resources, including with the City's tree protection ordinance and Open Space Elements of the General Plan, would occur during operation and routine maintenance of the Project and Project Alternatives.

Impact BIO-6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No conflicts with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP would occur.

The Project and Project Alternatives

Construction Impacts

As described in Section 3.3.1, the BSA does not fall within the boundaries of an adopted HCP, NCCP, or other approved local, regional, or state HCP. As a result, no impacts would occur related to conflicts with such plans during the construction of the Project and Project Alternatives.

Operational Impacts

The Project and Project Alternatives would primarily be located within impermeable areas and the BSA does not fall within the boundaries of an adopted HCP, NCCP, or other approved local, regional, or state HCP. As a result, no impacts related to conflicts with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP would occur during operation and routine maintenance of the Project and Project Alternatives.

3.3.5 Mitigation Measures

Project and Project Alternatives

- BIO-A** Construction activities, including the clearance of vegetation potentially suitable for special-status bird species, shall occur outside of the nesting season (generally February 15 through September 15). If avoidance of construction activities within this time period is not feasible, the following measures shall be employed:
1. Pre-construction nesting surveys shall be conducted by a qualified biologist both two weeks prior to and within 3 days prior to the start of construction activities to determine whether active nests are present within or directly adjacent to the construction zone. All nests found shall be recorded.
 2. If construction activities must occur within 300 feet of an active nest of any passerine bird or within 500 feet of an active nest of any raptor, with the exception of an emergency, a qualified biologist shall monitor the nest on a weekly basis and the construction activity shall be postponed until the biologist determines that the nest is no longer active.
 3. If the recommended nest avoidance zone is not feasible, the qualified biologist shall determine whether an exception is possible and obtain concurrence from the appropriate resource agency before construction work can resume within the avoidance buffer zone. All work shall cease within the avoidance buffer zone until either agency concurrence is obtained or the biologist determines that the adults and young are no longer reliant on the nest site.

3.3.6 Impacts after Mitigation

Based on the analysis presented above regarding anticipated effects of the Project and Project Alternatives, significant impacts to nesting birds protected under the MBTA and by CFGC could occur. However, with implementation of Mitigation Measure BIO-A, construction BMPs regarding dust control (see Section 2.6.11 in Chapter 2, Project Description), impacts to biological resources would be less than significant.

No impacts would occur during construction and operation of the Project and Project Alternatives to riparian habitat and other sensitive natural communities; federally protected wetlands; native wildlife movement, wildlife movement corridors, and wildlife nursery sites; or to biological resources protected by local policies or ordinances.

3.3.7 Cumulative Impacts

No Project Alternative

Related projects identified within approximately 1 mile of the Project site generally include commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning biological resources.

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to biological resources were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulative impact related to biological resources.

The Project and Project Alternatives

Construction Impacts

Related projects identified within approximately 1 mile of the Project site generally include commercial and residential construction or expansion. Similar to construction of the Project and Project Alternatives, construction of the related projects could potentially significantly impact biological resources. However, the Project and Project Alternatives would implement construction BMPs regarding dust control (see Section 2.6.11 in Chapter 2, Project Description) and Mitigation Measure BIO-A to ensure that impacts related to biological resources would be less than significant and that no conflicts with federal, state, and local regulations and policies protecting biological resources would occur. Related projects would also be required to be consistent with applicable federal, state, and local regulations concerning biological resources. Impacts for the Project and Project Alternatives would be localized and minimized, and, as such, the Project and Project Alternatives would not contribute to a cumulatively considerable construction impact related to biological resources.

Operational Impacts

The Project and Project Alternatives are not expected to significantly impact biological resources during operations. Post-construction conditions would be similar to existing conditions as the Project and Project Alternatives would not significantly change existing conditions. As such, the Project and Project Alternatives would not contribute to a cumulatively considerable operational impact related to biological resources.

3.4 Cultural Resources

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to cultural resources, including historical and archaeological resources. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. This section also discusses how the Project and Project Alternatives would impact cultural resources within the Area of Potential Effects (APE) and proposed mitigation measures to reduce impacts, if needed.

3.4.1 Regulatory Setting

Historical Resources

National Historic Preservation Act

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) to recognize resources associated with the country's history and heritage. The NRHP is the nation's master inventory of known historic resources. The NRHP is administered by the National Park Service (NPS) and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Eligibility for the NRHP is addressed in National Register Bulletin (NRB) 15: How to Apply the National Register Criteria for Evaluation. NRB 15 states that to be eligible for the NRHP, a resource must (1) be historically significant, and (2) retain sufficient integrity to adequately convey its significance.

Significance is assessed by evaluating a resource against established eligibility criteria. A resource is considered significant if it satisfies any one of the following four NRHP criteria:³

- Criterion A (events): associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- Criterion B (persons): associated with the lives of significant persons in our past;
- Criterion C (architecture): embodies the distinctive characteristics of a type, period, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- Criterion D (information potential): has yielded or may be likely to yield, information important in prehistory or history.

Once significance has been established, it must then be demonstrated that a resource retains enough of its physical and associative qualities—or *integrity*—to convey the reason(s) for its significance. Integrity is best described as a resource's "authenticity" as expressed through its physical features and extant characteristics. Generally, if a resource is recognizable as such in its present state, it is said to retain integrity, but if it has been extensively altered then it does not. Whether a resource retains sufficient integrity for listing is determined by evaluating the

³ Some resources may meet multiple criteria, though only one criterion needs to be satisfied for NRHP eligibility.

seven aspects of integrity defined by NPS:

- Location (the place where the historic property was constructed or the place where the historic event occurred);
- Setting (the physical environment of a historic property);
- Design (the combination of elements that create the form, plan, space, structure, and style of a property);
- Materials (the physical elements that were combined or deposited during a particular period of time and in a particular manner or configuration to form a historic property);
- Workmanship (the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory);
- Feeling (a property's expression of the aesthetic or historic sense of a particular period of time); and
- Association (the direct link between an important historic event/person and a historic property).

According to NRB 15, integrity is evaluated by weighing all seven of these aspects together and is ultimately a “yes or no” determination; that is, a resource either retains sufficient integrity, or it does not. Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for the resource's significance. Since integrity depends on a resource's placement within a historic context, integrity can be assessed only after it has been concluded that the resource is in fact significant.

California Register of Historical Resources

Under CEQA, a project may have a significant impact if it causes “substantial adverse change in the significance of an historical resource,” which means “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” (14 California Code of Regulations [CCR] Section 15064.5(b)). Historical resources are generally those listed in or determined eligible for listing in the California Register of Historical Resources (CRHR). The CRHR is an authoritative guide used to identify, inventory, and protect historical resources in California. Established by an act of the State Legislature in 1998, the CRHR program encourages public recognition and protection of significant architectural, historical, archaeological, and cultural resources; identifies these resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and affords certain protections under the CEQA.

In addition to assessing whether historical resources potentially impacted by a proposed project are listed in the CRHR or have been identified in a survey process, lead agencies have a responsibility to evaluate them against the CRHR criteria prior to making a finding as to a proposed project's impacts to historical resources (California Public Resources Code [PRC] Section 21084.1, 14 CCR Section 15064.5(a)(3)).

Properties eligible for the CRHR are those found to meet the criteria for listing in the CRHR (PRC Section 5024.1). A resource may be listed as a historical resource in the CRHR, if it meets any of the following criteria:

- Criterion 1 (events): associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;
- Criterion 2 (persons): associated with the lives of persons important to local, California, or national history;
- Criterion 3 (architecture): embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;
- Criterion 4 (information potential): has yielded, or has the potential to yield, information important in prehistory or history of the local area, state, or the nation

Similar to the NRHP, in addition to meeting at least one of the CRHR criteria, resources “must retain enough of their historic character or appearance to be recognizable as historical resources and to convey the reasons for their significance” (OHP 2004). Evaluation under the CRHR criteria must assess whether a resource also retains its integrity, which comprises the physical and visual characteristics necessary to convey its significance.

The CRHR also includes:

- California properties formally determined eligible for, or listed in, the NRHP.
- State Historical Landmark No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the office shall review their eligibility for the CRHR in accordance with procedures to be adopted by the commission.
- Points of historical interest which have been reviewed by the office and recommended for listing by the commission for inclusion in the CRHR in accordance with criteria adopted by the commission.

Properties of local significance that have been designated under a local preservation ordinance (local landmarks or landmark districts) or that have been identified in a local historical resources inventory may be eligible for listing in the CRHR and are presumed to be significant resources for purposes of CEQA unless a preponderance of evidence indicates otherwise (PRC Section 5024.1, 14 CCR Section 4850).

Archaeological Resources

PRC Section 21083.2 and Section 21084.1 operate independently to ensure that potential effects on archaeological resources are considered as part of the environmental analysis for a project. Either of these benchmarks may indicate that a project may have a potential substantial adverse change on archaeological resources. Other state-level requirements for cultural resources management are written into PRC Chapter 1.7, Section 5097.5 (Archaeological, Paleontological, and Historical Sites).

State CEQA Guidelines (14 CCR Section 15064.5(c)) provide the framework for the evaluation of impacts on archaeological resources. When a project will impact an archaeological site, the lead agency must first determine whether the site is a historical resource. An archaeological site may be considered a historical resource if it is significant in the architectural, engineering,

scientific, economic, agricultural, educational, social, political, military, or cultural annals of California (PRC Section 5020.1(j)) or if it meets the criteria for listing in the CRHR (14 CCR Section 4850). If an archaeological site is determined to be a historical resource, provisions regarding historical resources in PRC Section 21084.1, 14 CCR Section 15064.5(b), and 14 CCR Section 15126.4 apply (see “Historical Resources” section above).

If an archaeological site is not a historical resource but meets the definition of a “unique archaeological resource” as defined in PRC Section 21083.2(g), it is subject to the provisions in that section. PRC Section 21083.2 outlines objectives, criteria, and procedures for lead agencies to address potential significant effects on archaeological resources and includes provisions for archaeological sites accidentally discovered during construction. These provisions may include an immediate evaluation of the find. If the find is determined to be a unique archaeological resource, contingency funding and a time allotment sufficient to allow recovering an archaeological sample or to employ one of the avoidance measures may be required under the provisions set forth in this section. Construction work may continue on other parts of the building site while archaeological mitigation takes place.

California Health and Safety Code Section 7050.5, and PRC Sections 5097.94 and 5097.98 outline procedures to be followed in the event human remains are discovered during the course of California projects. If human remains are encountered, all work must stop at that location and the County Coroner must be immediately notified and advised of the finding. The County Coroner would investigate “the manner and cause of any death” and make recommendations concerning treatment of the human remains. The County Coroner must make their determination within 2 working days of being notified. If the human remains are determined to be Native American, the County Coroner shall contact the California Native American Heritage Commission (NAHC). The Commission would in turn “...immediately notify those persons it believes to be most likely descended from the deceased Native American.” The descendants would then inspect the site and make recommendations for the disposition of the discovered human remains. This recommendation from the most likely descendants may include the scientific analysis of the remains and associated items.

Local

City of Beverly Hills Municipal Code

The Beverly Hills Municipal Code, Title 10, Chapter 3, Articles 32 and 32.5, governs the definition and treatment of historical resources on a local level. Article 10-3-3207 establishes a Cultural Heritage Commission, consisting of five members appointed by the City Council, and charges them (among other duties) to “Inspect, investigate, and recommend for designation by the city council landmarks and historic districts” and “Compile or cause to be compiled and maintained the local register listing and describing all designated historic properties within the city.” Incentives are provided to landowners to nominate their properties to the register.

City of Beverly Hills General Plan

The City of Beverly Hills General Plan, amended on January 12, 2010, provides a comprehensive framework that guides the City’s development through 2025. The Historic Preservation Element of the General Plan outlines goals and policies for the protection of historical and archaeological resources. Goal HP-1.4 encourages the City to “Develop and fund financial and regulatory incentives to encourage the protection of historic buildings, districts, and public landmarks/monuments from demolition or significant alteration.”

Goal HP-1.8 is designed to protect prehistoric and historic archaeological resources: “Temporarily suspend all earth disturbing activity within 100-feet of a potential resource, if any such resources are discovered during construction-related earth-moving activities, to assess the significance of the find, and require appropriate mitigation before work resumes.”

3.4.2 Methodology and CEQA Thresholds

Methodology

The following sections discuss the delineation of the resource study area and research, field survey, identification, and evaluation methodology for the Project. The cultural resources studies were conducted by cultural resources specialists who meet the Secretary of the Interior’s Professional Qualifications Standards (36 CFR Part 61) in Archaeology and Architectural History.

Area of Potential Effects

The APE for cultural resources was delineated to ensure identification of significant cultural resources that may be directly or indirectly affected by the Project or Project Alternatives (Figure 3.4-1).

For historic built resources, the APE extends one parcel past the limits of the above-ground improvements for the Project and Project Alternatives. This includes the areas that are expected to be directly or indirectly impacted by either construction or operation of the Project or Project Alternatives and areas that may be impacted by noise and vibration from the construction and operation of the Project or Project Alternatives. In areas where the Project will be contained within the right-of-way (ROW) and below grade, the APE does not consider adjacent properties and is limited to the existing roadway. For archaeological resources, the APE consists of the area of direct impact, which consists of the three-dimensional area of potential ground disturbance for the Project, including all staging areas and other areas of temporary impact.

Archival Research

Background research included a records search conducted at the South Central Coastal Information Center (SCCIC) at California State University, Fullerton; a Sacred Lands File Search conducted by the NAHC; review of the City of Beverly Hills Historic Resource Survey; and review of other online repositories for historic maps and aerial photographs.

A records search conducted at the SCCIC at California State University, Fullerton, on July 9, 2019, provided information related to previously conducted cultural resource investigations and records of known cultural resources. The records search included information within a 1-mile radius of the Project and Project Alternatives for archaeological resources and a 0.5-mile radius of the Project and Project Alternatives for historic built resources. In addition, the records search reviewed the NRHP, the CRHR, and the list of California Historical Landmarks to identify historical resources within a 0.5-mile radius of the Project and Project Alternatives. The records search also reviewed California Points of Historical Interest and the California State Historic Resources Inventory (HRI) for other potentially significant resources located near the Project and Project Alternatives.

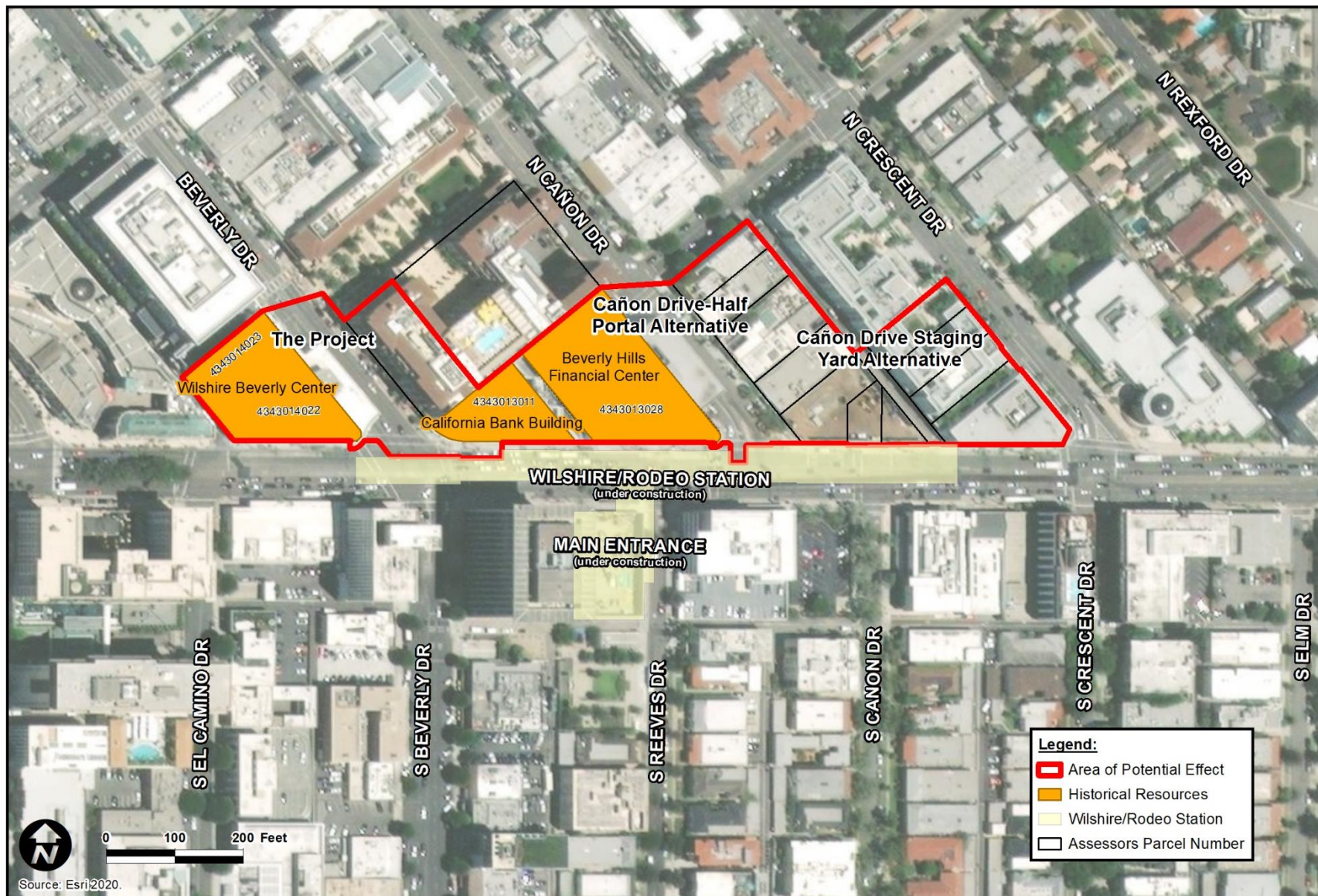


Figure 3.4-1 Cultural Resources APE for the Project and Project Alternatives

The results of the SCCIC records search included 28 cultural resource investigations that were previously conducted within a 0.5-mile radius of the Project and Project Alternatives (Appendix E). The results identified one environmental review document, the *Final Environmental Impact Statement/Final Environmental Impact Report for the Westside Subway Extension* (U.S. Department of Transportation and Metro 2012), and four cultural resources investigations that informed it: *Metro Westside Subway Extension Historic Property Survey Report* (Metro 2010a), *Westside Subway Extension Cultural Resources Technical Report* (Metro 2010b), *Westside Subway Extension Project Historic Property Supplemental Survey Technical Report* (Metro 2012a), and *Westside Subway Extension Project Supplemental Cultural Resources Report* (Metro 2012b). The Westside Subway Extension Project (now referred to as the Purple Line Extension Project) partially overlapped with the APE and included analyses of impacts on historical resources and archaeological resources.

The records search identified 37 previously recorded historic built resources within a 0.5-mile radius of the Project and Project Alternatives (Appendix E). The resources included 31 buildings or building complexes, one park, and 5 light or utility poles. Two previously evaluated historic built resources were identified within the APE: the California Bank Building (Sterling Plaza) (P-19-177320) and the Wilshire Beverly Center (Chase Bank) (P-19-189313). Both resources were previously evaluated as eligible for the NRHP and CRHR.

The records search did not identify any previously recorded prehistoric cultural resources within a 1-mile radius of the Project and Project Alternatives. However, the Westside Subway Extension Cultural Resources Technical Report (Metro 2010b) found the overlapping area to have a moderate to high potential for archaeological resources.

The HRI listed 184 buildings and structures within a 0.5-mile radius of the Project and Project Alternatives (Appendix E). Only one historic built resource within the APE, the California Bank Building (Sterling Plaza) (P-19-177320), is listed in the HRI.

Review of the City of Beverly Hills Historic Resources Survey provided further information on previously recorded and evaluated historic built resources in the APE. The inventory identified historic built resources throughout the city in 1985–86 (City of Beverly Hills 1986) and has since been updated in phases. Specifically, *Historic Resources Survey Report: Part I: Historic Resources Survey Update; Part II: Area 4 Multi-Family Residence Survey* (PCR Services Corporation 2004) and *City of Beverly Hills Historic Resources Survey Report, Survey Area 5: Commercial Properties* (Jones & Stokes 2007) cover the locations of the Project and Project Alternatives.

Field Survey

Cultural resources specialists conducted a reconnaissance cultural resources survey of the APE on December 9, 2019, noting and photographing any potential cultural resources for recordation. Previously recorded cultural resources were revisited. No archaeological materials were observed. The reconnaissance survey identified three historic built resources that appeared more than 45 years old (built by 1975) and not substantially altered beyond recognition (Table 3.4-1).

Table 3.4-1 Historic Built Resources in the APE

APN	Name/Address	Construction Date	Status Code ¹
4343-014-022	Wilshire Beverly Center (Chase Bank) 9465 Wilshire Blvd.	1960–1962	3S/3CS
4343-013-011	California Bank Building (Sterling Plaza) 9441 Wilshire Blvd.	1929	3S/3CS
4343-013-028	Beverly Hills Financial Center 9401 Wilshire Blvd.	1972	3CS

¹ California Historical Resource Status Codes - 3S: Appears eligible for National Register as an individual property through survey evaluation; 3CS: Appears eligible for California Register as an individual property through survey evaluation.

Evaluation Methodology

Historical resources identification efforts focused on parcels containing improvements constructed by 1974 (more than 45 years old). Information regarding the date of improvement was obtained from the Los Angeles County Assessor, historical research, and/or visual survey. Existing Department of Parks and Recreation (DPR) 523 forms for all previously recorded resources identified within the APE were updated to document current conditions and the integrity of historic built resources that meet the definition of a historical resource under CEQA (PRC Section 5024.1). DPR 523 forms are included in Appendix E of this EIR.

Impacts to all identified eligible, determined eligible, or listed historical resources were evaluated within the current context and setting of the property. Potential impacts to cultural resources resulting from the Project and Project Alternatives were assessed for substantial adverse changes to historical and archaeological resources as defined in 14 CCR Section 15064.5(b).

CEQA Thresholds

An impact is considered significant if the project would:

1. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; and/or
3. Disturb any human remains, including those interred outside of dedicated cemeteries.

3.4.3 Existing Conditions

Historical Context

Prehistoric Setting

Southern California is known to have been inhabited by native peoples at least 13,000 years Before Present (B.P.) (Arnold et al. 2004). The first evidence of human occupation in the Los

Angeles area dates to at least 9000 B.P. and is associated with a period known as the Millingstone Cultural Horizon (Wallace 1955; Warren 1968). Millingstone populations established permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating after 5000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Although many aspects of Millingstone culture persisted, by 3500 B.P., a number of socioeconomic changes occurred that are associated with the period known as the Intermediate Horizon (Erlandson 1994; Wallace 1955; Warren 1968). Increasing population size required new technological innovations, such as the circular shell fishhook, the mortar and pestle, and the dart and atlatl, to maximize extraction of terrestrial and marine resources, resulting in a more diverse hunting capability (Erlandson 1994). The Intermediate Horizon marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended.

The Late Prehistoric period, spanning from approximately 1500 B.P. to the Spanish mission era, is the period associated with the florescence of contemporary Native American groups. Gabrielino villages were reported to have been most abundant near the Los Angeles River in the area north of downtown Los Angeles, known as the Glendale Narrows, and those areas along the river's various outlets into the sea, including San Pedro Bay (Gumprecht 1999). Early explorers such as the Cabrillo Expedition visited the bay in 1542, marking the first known incursion by Europeans into what is today Los Angeles County.

Historic Setting

The first European exploration of what is today the city of Beverly Hills occurred in August 1769, when Governor Gaspar de Portolá traversed the area while exploring the region between San Diego and a planned new settlement at Monterey. The party camped in the vicinity of modern Beverly Hills on August 3 and met many Native Americans in the area. In 1771, Mission San Gabriel Arcángel was established by Spanish missionaries along the Rio Hondo River in what is now Whittier Narrows (McCawley 1996:189). European diseases devastated the Gabrielino population, and by the early 1800s, the majority of the surviving Gabrielino population had entered the mission system. This lifestyle change brought major consequences for Gabrielino cultural integrity. In the 1830s, the secularization of the mission system, the rise of private ranching, the increase in the local population, and the growth of local retail businesses caused more changes to the economic landscape of Los Angeles County.

In 1838, Governor Pío de Jesús Pico granted 4,539 acres, including the land currently occupied by the city of Beverly Hills, to Maria Rita Valdez as Rancho Rodeo de las Aguas. Valdez sold the property to Henry Hancock and Benjamin Wilson in 1854. The rancho passed through a series of hands until 1871, when the land was purchased by Henry Hammel and Andrew H. Denker, managers of the United States Hotel, who intended to subdivide the land. However, it was not until early in 1906 that the land on which Beverly Hills is now located was sold to the Rodeo Land & Water Company. On November 14, 1906, a plat of the new subdivision known as Beverly was recorded, covering land bounded by Wilshire and Santa Monica Boulevards. The street names Beverly, Cañon, and Crescent first appear on this plat (Robinson 1939:169).

Efforts to create the present community of Beverly Hills finally succeeded in 1907. Even then, the pace of development was leisurely, picking up only after the construction of the Beverly Hills Hotel in 1911, with the real boom in development not occurring until the decade of the 1920s. Settled initially by magnates and businesspeople such as oilmen Kirk B. Johnson and Max Whittier, Beverly Hills found itself synonymous with “hometown to the stars” after Douglas Fairbanks and Mary Pickford took up residence at Pickfair in 1920. Many other entertainment industry figures followed during the succeeding decades. In the 1930s and 1940s, the retail district of Beverly Hills began to compete with the Miracle Mile district in Hollywood, and newly developed Westwood Village for the title of the most fashionable shopping district in metropolitan Los Angeles. In the post-World War II era, the city’s downtown became an important center for professional and business offices as well (City of Beverly Hills 1986).

During the post-World War II period (1945–1975) a large number of medium to large-scale office buildings were erected along the commercial corridors of Beverly Hills, with the largest concentration and the most prominent examples found on Wilshire Boulevard. These buildings were predominantly architect-designed by practitioners offering a wide range of modernistic interpretations. Architects William Pereira, Charles Luckman, Maxwell Starkman, I.M. Pei, Victor Gruen Associates, Welton Becket and Associates, Craig Elwood, Langdon and Wilson, Edward Durrell Stone, Palmer and Krisel, Anthony Lumsden, and particularly Sidney Eisenshtat are credited with several of the modern buildings on Wilshire Boulevard (Jones & Stokes 2007).

Historical Resources

Background research and the field survey identified three historical resources in the APE:

- Wilshire Beverly Center (Chase Bank)
- California Bank Building (Sterling Plaza)
- Beverly Hills Financial Center

Wilshire Beverly Center

The Wilshire Beverly Center (currently Chase Bank, formerly Bank of America) is an eight-story, Abstract Modernist-style (Neo-Expressionist) commercial building (Figure 3.4-2). The building is at the northwest corner of the intersection of Wilshire Boulevard and Beverly Drive. Victor Gruen Associates designed the building in 1960 for the Buckeye Realty & Management Company; the Buckeye Construction Company built it in 1961–62. The building has an irregular plan with an angled, south-facing façade along Wilshire Boulevard. It has recessed, glass commercial storefronts under boxed awnings or canopies in the first stories of the south and east elevations. The upper stories have angled walls consisting of marble tile veneer with recessed bands of ribbon windows. A prominent feature of the building is a curved wall at the southeast corner of the façade, consisting of an articulated steel frame with deep-set individual windows. The building is topped with a flush parapet and flat roof. The building was previously found eligible for the NRHP under Criterion C and the CRHR under Criterion 3 for its embodiment of the Neo-Expressionist style, including its distorted and curved shape, elevated main mass, lack of symmetry, smooth exterior walls, and ribbon windows. The Wilshire Beverly Center meets the definition of a historical resource under CEQA (Metro 2012a).



Figure 3.4-2 Wilshire Beverly Center, view facing northwest

California Bank Building

The California Bank Building (now Sterling Plaza) is a seven-story Art Deco-style commercial building (Figure 3.4-3). The building is located at the northeast corner of the intersection of Wilshire Boulevard and Beverly Drive. Designed by architects John and Donald B. Parkinson and built in 1929, the building features a symmetrical, stepped tower with flat roofs; full-height, fluted pilasters; tall, narrow window bays containing metal-framed, fixed panes; gold relief accents at the parapets and screenwork in the upper tower; and molded geometric shapes at the parapets and chevrons at the cornices. The first story of the building occupies the entire triangular lot and features glass storefronts separated by fluted piers with ornate cornice above. The building was previously found eligible for the NRHP under Criterion C and the CRHR under Criterion 3 for its embodiment of the Art Deco style, including its symmetry and verticality, stepped tower, smooth surfaces, and use of geometric motifs. The California Bank Building meets the definition of a historical resource under CEQA (Metro 2010a).

The Beverly Hills Financial Center is a 12-story concrete and steel commercial building with elements of Brutalism and the International Style (Figure 3.4-4). The building is at the northwest corner of the intersection of Wilshire Boulevard and Cañon Drive, and has a rectangular plan that is set back at a diagonal angle from Wilshire Boulevard. It features a three-story pedestal base with an open-air parking deck above with piers that support eight elevated upper stories. The pedestal base features a continuous plate glass and aluminum frame commercial storefront in the first story of the southeast and east elevations and two floors of parking above with concrete exterior walls that have a series of open-air windows with angled sills along the southeast and east elevations. The upper section is 13 bays wide by 17 bays deep with glass corners. Each bay contains recessed fixed window panes with a horizontal band and slanted sill. The building has a flush parapet and flat roof. The building also features a formal landscaped plaza with a tiled elevated terrace, steps, and planters.



Figure 3.4-3 California Bank Building, view facing northeast

Beverly Hills Financial Center

The Beverly Hills Financial Center was evaluated for eligibility for listing in the CRHR. Built in 1972, architect Howard R. Lane designed the building and its transitional characteristics between the International Style and Brutalism. It has distinctive characteristics of the International Style, including elevated vertical box massing, concrete exterior walls, and extensive windows, and a repetitious cell-like character expressed in the exterior fenestration. Elements of Brutalism include the use of solid concrete forms and the imposing monumentality of the building. Howard R. Lane (1922–88) was a well-known architect in the Los Angeles area from the 1950s to the 1970s. The Beverly Hills Financial Center is a late example of his work but represents his connection to the International Style, which he studied under Mies van der Rohe in the late 1940s, and his embrace of Brutalism, which was a popular style for large civic and commercial structures from the 1950s until the 1980s. The building is eligible for the CRHR under Criterion 3 and meets the definition of a historical resource under CEQA (for more information see DPR forms in Appendix E of this EIR).



Figure 3.4-4 Beverly Hills Financial Center, view facing north

Archaeological Resources

The archaeological records search identified no archaeological resources within or adjacent to the APE. During the archaeological survey, all exposed ground surfaces were inspected for the presence of artifacts, archaeological features, or other evidence of past human activity. No archaeological materials were observed. However, more than 95 percent of the APE is currently paved or built over, obscuring the ground surface. Only a few small landscaped areas were inspected, and these likely contained imported fill. The archaeological survey was therefore inconclusive.

3.4.4 Impact Evaluation

Impact CUL-1. Cause a substantial adverse change in the significance of a historical resource pursuant to CCR Section 15064.5.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to historic resources as a result of the Purple Line Extension Project were evaluated in a separate environmental review process. Therefore, no impacts would occur related to historical resources.

The Project (Beverly Drive)

Construction Impacts

Construction activities include sidewalk closure, cut and cover piling, and excavation adjacent to (less than 10 feet from) the Wilshire Beverly Center and the California Bank Building. Construction of the Project may also require the temporary removal and subsequent reinstatement of the boxed canopy on the east elevation of the Wilshire Beverly Center.

Removal of the canopy would materially alter the Wilshire Beverly Center. However, implementation of Mitigation Measure CUL-A would avoid or minimize damage to the canopy, in adherence to the Secretary of the Interior's Standards for the Treatment of Historic Properties. An appropriate treatment plan that addresses careful handling during removal, storage, and reattachment, would be implemented to protect the historical resource. With implementation of Mitigation Measure CUL-A, the boxed canopy would be restored to its original location on the building, and direct construction impacts related to historical resources would be less than significant.

Although the atmospheric intrusions of the construction activities would disturb the setting of the buildings, audible and visual impacts related to construction would be temporary and would not permanently or materially impair the significance of the historical resources.

Subsurface construction activities that would occur next to the foundations of the Wilshire Beverly Center and the California Bank Building may cause differential settlement or vibration due to piling and excavation that may impact the historical resources; therefore, this impact is considered significant. Implementation of Mitigation Measure CUL-B would include a pre-construction survey of impacted historical resources for pre-construction conditions and further subsurface investigation to protect the buildings from differential settlement or vibration damage. With implementation of Mitigation Measure CUL-B, construction impacts related to historical resources would be less than significant.

Operational Impacts

The permanent elements of the Project that would be visible aboveground include a sidewalk extension and station portal entrance/exit within the existing street ROW on the west side of North Beverly Drive, including two elevators, a stairway, one "up" escalator, and a one-story

glass and steel canopy above the entrance/exit. Street-level signage associated with the station portal would be minimal.

Although the Wilshire Beverly Center is located adjacent to the aboveground elements of the Project, based on conceptual designs, the Project would not materially alter the historical resource or its setting. The Project would place the station portal within the existing parking lane and southbound right-turn lane on the west side of North Beverly Drive, near but separated from the east elevation of the Wilshire Beverly Center by the width of the sidewalk. The east elevation is minor in relation to the character-defining features of the overall building that are presented along Wilshire Boulevard (south elevation), and the proposed station portal canopy would not block the primary view of the building. Therefore, operational impacts related to historical resources would be less than significant.

The California Bank Building (Sterling Plaza) is across North Beverly Drive from the Project site and is situated on a triangular lot that faces Wilshire Boulevard. Due to the distance between the aboveground elements associated with the Project, the Project would not intrude on its setting, nor materially alter or impair the historical resource. Therefore, operational impacts related to historical resources would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

Construction activities include sidewalk closure, cut and cover piling, and excavation adjacent to (less than 15 feet from) the Beverly Hills Financial Center. Construction would not demolish, destruct, relocate, or materially alter the building; therefore, the Cañon Drive-Half Portal Alternative would not result in direct impacts to that historical resource. Although the atmospheric intrusions of the construction activities would disturb the setting of the building, audible and visual impacts related to construction would be temporary and would not permanently or materially impair the significance of the historical resource.

Subsurface construction activities that would occur next to the foundation of the Beverly Hills Financial Center may cause differential settlement or vibration due to piling and excavation that may impact the historical resource; therefore, this impact is considered significant.

Implementation of Mitigation Measure CUL-B would include a pre-construction survey of impacted historical resources for pre-construction conditions and further subsurface investigation to protect the buildings from differential settlement or vibration damage. With implementation of Mitigation Measure CUL-B, construction impacts related to historical resources would be less than significant.

Operational Impacts

Similar to the Project, the permanent aboveground elements of the Cañon Drive-Half Portal Alternative would include a sidewalk extension and station portal entrance/exit within the existing street ROW on the west side of North Cañon Drive, including two elevators, a stairway, one “up” escalator, and a one-story glass and steel canopy above the entrance/exit. Street-level signage associated with the station portal would be minimal.

The Beverly Hills Financial Center is adjacent to (less than 15 feet from) the visible aboveground elements associated with the Cañon Drive-Half Portal Alternative. This alternative would place the station portal within the existing parking lane and southbound right-turn lane on the west side of North Cañon Drive, near but separated from the east elevation of the Beverly

Hills Financial Center by the width of the sidewalk. The portal would partially obscure views of the building. Considering the difference in scale between the 12-story building and the 1-story canopy, the portal would minimally obscure views of the building along its east elevation, which is a secondary elevation in the overall design of the building. Based on its placement, the portal would also partially obscure views of the plaza along North Cañon Drive. However, the portal would be separated from the plaza by the existing sidewalk and, based on conceptual plans for the aboveground canopy that show it consisting primarily of glass or transparent materials, would minimally obscure views of the plaza along North Cañon Drive. Based on the scale, orientation, and design of the canopied portal, the new improvements would not materially alter the historical resource or its setting. Therefore, operational impacts related to historical resources would be less than significant.

Cañon Drive Staging Yard Alternative

Construction and Operational Impacts

No historical resources in the APE are adjacent to the Cañon Drive Staging Yard Alternative that would be impacted by the construction or operation of this alternative. Therefore, construction and operational impacts related to historical resources would be less than significant.

Impact CUL-2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to CCR Section 15064.5.

No Project Alternative

Under the No-Build Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to archaeological resources as a result of the Purple Line Extension Project were evaluated in a separate environmental review process. Therefore, no impacts would occur related to archaeological resources.

The Project and Project Alternatives

Construction Impacts

Construction of the Project and Project Alternatives would include ground-disturbing activities, such as excavation. The archaeological records search and survey identified no archaeological resources within or adjacent to the APE. However, unknown resources may exist below grade within the APE. A review was conducted of an analysis prepared for the previously approved Purple Line Extension Project, which found that the sensitivity of the Purple Line APE located immediately adjacent to and overlapping the APE of the Project and Project Alternatives ranged from moderate to high (Metro 2010b). Human activity on the North American continent is limited to the end of the Pleistocene and the Holocene epochs. The sedimentary deposit that represents these time periods is known as younger Quaternary alluvium, which consists of alluvial gravel, sand, and silt-clay derived from the nearby Santa Monica Mountains. Historic archaeological resources may exist relatively close to the surface, and the sensitivity for prehistoric resources increases with depth until the base of the younger Quaternary alluvium is reached. Below the younger Quaternary alluvium, sedimentary deposits date to the Pleistocene and earlier, and are anticipated to pre-date human activity on the continent. As such, there is

potential to encounter previously undiscovered archaeological resources during construction activities. Implementation of Mitigation Measure CUL-C halts work if cultural resources are encountered, and provides means of evaluation and treatment of such resources. Mitigation Measure CUL-C would therefore protect unknown archaeological resources that could be encountered during construction. With implementation of Mitigation Measure CUL-C, construction impacts related to archaeological resources would be less than significant.

Operational Impacts

The Project and Project Alternatives would operate as a station portal on the north side of Wilshire Boulevard, and no ground-disturbing activities would occur during operations. As previously mentioned, no archaeological resources were found to exist within or adjacent to the APE. Therefore, operational impacts related to archaeological resources would be less than significant.

Impact CUL-3. Disturb any human remains, including those interred outside of dedicated cemeteries.

No Project Alternative

Under the No-Build Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Therefore, no impacts would occur related to human remains.

The Project and Project Alternatives

Construction Impacts

No evidence of human remains were observed during the field survey; as such, human remains are not expected to be encountered during construction. No formal cemeteries are known to occur within 0.25 mile of the APE. In addition, no formal cemeteries or other places of human internment are known to exist within the Project or Project Alternatives sites. In the event that human remains or related items are discovered during construction, such resources would be treated in accordance with state and local regulations and guidelines for disclosure, recovery, relocation, and preservation, as appropriate, pursuant to PRC Section 5097.98 et seq.; California Health and Safety Code Section 7050.5; and others. In addition, implementation of Mitigation Measure CUL-C would reduce impacts in the event human remains are discovered during construction activities. Mitigation Measure CUL-C would require halting work if human remains are encountered, initiating contact with the Coroner, and consultation with the appropriate individuals and organizations as defined by California state law. With implementation of Mitigation Measure CUL-C, construction impacts related to human remains would be less than significant.

Operational Impacts

The Project and Project Alternatives would operate as a station portal on the north side of Wilshire Boulevard. As previously mentioned, no evidence of human remains were found to exist within or adjacent to the APE, and no ground-disturbing activities would occur during operations. Therefore, operational impacts related to human remains would be less than significant.

3.4.5 Mitigation Measures

Project and Project Alternatives

CUL-A Wilshire Beverly Center Canopy Removal and Reinstatement

For the historical resource, the Wilshire Beverly Center, a treatment plan for the removal and reinstatement of the existing boxed canopy on the east elevation of the building facing North Beverly Drive shall be required prior to removal of the canopy. The treatment plan shall determine and guide the appropriate removal, storage, and reattachment processes and techniques to avoid or minimize damage to historic materials, in adherence with the Secretary of the Interior's Standards for the Treatment of Historic Properties. An architectural historian or historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) shall prepare or provide input for the treatment plan prior to removal of the canopy. The City shall approve and implement the treatment plan to proceed with the removal of the canopy. Implementation of the treatment plan shall be monitored and approved by an architectural historian or historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61). The monitor shall ensure that the treatment plan is implemented appropriately and provide a monitoring report or memorandum documenting the removal and reinstatement of the canopy.

CUL-B Pre-Construction and Construction Phases

For the historical resources, the Wilshire Beverly Center, California Bank Building, and Beverly Hills Financial Center, further geotechnical investigations shall be undertaken to evaluate soil, groundwater, seismic, and environmental conditions along the alignment. This analysis shall include a pre-construction survey of the historical resources to document their pre-construction conditions and shall assist in the development of appropriate support mechanisms and measures for cut and cover piling and excavation within construction areas. The subsurface investigation should also identify areas that could cause differential settlement as a result of using vibratory construction equipment in close proximity to historical resources. An architectural historian or historical architect who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR Part 61) shall provide input and review of final design documents prior to implementation of the mechanisms and measures. The review shall evaluate whether the geotechnical investigations and support measures for cut and cover and measures to prevent differential settlement meet the Secretary of the Interior's Standards for the Treatment of Historic Properties. The City shall approve the evaluation to proceed with construction.

CUL-C Unanticipated Discovery of Cultural Resources

If previously unidentified cultural resources are encountered during construction or earth-disturbing activities, all activities within 50 feet of the discovery shall be halted until a qualified archaeologist can examine the resources and assess their significance. If the resources are determined to be significant, the City shall notify the State Historic Preservation Officer within 48 hours of the discovery to determine the appropriate course of action. If human remains are encountered,

all work must stop at that location and the County Coroner must be immediately notified and advised of the finding.

For resources determined eligible or assumed to be eligible for the Local Register of Historic Properties, the City of Beverly Hills, with the advice of the qualified cultural resources specialist, shall determine a course of action to avoid, minimize, or mitigate adverse effects. Parties may be invited to consult at the discretion of the City of Beverly Hills.

For resources determined eligible or assumed to be eligible for the CRHR, the City of Beverly Hills will notify Metro of those actions that it proposes to avoid, minimize, or mitigate adverse effects. Consulting parties will have 48 hours to provide their views on the proposed actions. The City will ensure that timely-filed recommendations of consulting parties are taken into account prior to granting approval of the measures that the City and its partners will implement to resolve adverse effects. The City will carry out the approved measures prior to resuming construction activities in the location of the discovery.

The City of Beverly Hills will ensure that the expressed wishes of Native American individuals, tribes, and organizations, and particularly tribal governments, are taken into consideration when decisions are made regarding the disposition of other Native American archaeological materials and records relating to California Native American tribes.

Should Native American burials and related items be discovered during construction of the project, the City of Beverly Hills will consult with the affected Native American individuals, tribes, and organizations regarding the treatment of cultural remains and artifacts. These will be treated in accordance with the requirements of the California Health and Safety Code. If the County Coroner determines that the human remains are or may be of Native American origin, then the discovery shall be treated in accordance with the provisions of PRC Section 5097.98(a)-(d), which provides for the notification of discovery of Native American human remains, descendants; disposition of human remains, and associated grave goods.

3.4.6 Impacts after Mitigation

Implementation of Mitigation Measures CUL-A, CUL-B, and CUL-C would ensure that significant impacts on historical and archaeological resources, as well as human remains are avoided where actions are expected to meet the Secretary of the Interior's Standards for the Treatment of Historic Properties for the historical resources that may be affected by construction or associated improvements. The Project and Project Alternatives impacts would be less than significant.

3.4.7 Cumulative Impacts

No Project Alternative

Related projects identified within approximately 1 mile of the Project and Project Alternatives generally include commercial and residential construction or expansion. These related projects

would also be required to comply with applicable federal, state, and local regulations concerning cultural resources.

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to cultural resources were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulatively considerable impact related to cultural resources.

The Project and Project Alternatives

Construction and Operational Impacts

Similar to construction of the Project, construction of the related projects could potentially significantly impact historical resources. However, the Project would implement Mitigation Measures CUL-A and CUL-B to ensure that impacts related to historical resources would be less than significant. The two Project Alternatives would not impact historical resources. In addition, the Project and Project Alternatives would not impact any known archaeological resources or human remains; however, implementation of Mitigation Measure CUL-C would ensure impacts to unknown resources would be less than significant. Impacts for the Project and Project Alternatives would be localized and minimized and, as such, would not contribute to a cumulatively considerable construction impact related to cultural resources.

The Project and Project Alternatives would not impact cultural resources during operations as discussed in the analysis above. As such, the Project and Project Alternatives would not contribute to a cumulatively considerable operational impact related to cultural resources.

3.5 Energy

This section addresses energy use attributable to the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to energy. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. Below is a brief overview of federal, state, and local laws and regulations pertaining to energy. The analysis considers the primary uses of energy for the Project and Project Alternatives; the benefit of existing regulations that require energy-efficient construction and operation; the potential for the Project and Project Alternatives to result in the wasteful, inefficient, and unnecessary consumption of energy; and whether the Project and Project Alternatives would conflict with a plan for renewable energy or energy efficiency.

3.5.1 Regulatory Setting

The federal, state, and local regulatory background of energy plans, policies, regulations, and laws is presented below. Generally, these plans, policies, regulations, and laws do not directly apply to the Project and Project Alternatives but are presented to provide context to the regulatory framework.

Federal

Energy Policy and Conservation Act of 1975

The Energy Policy and Conservation Act of 1975 established the first fuel economy standards for on-road motor vehicles sold in the United States. The National Highway Traffic and Safety Administration is responsible for establishing standards for vehicles and revising the existing standards. The Corporate Average Fuel Economy program was created to determine vehicle manufacturers' compliance with the fuel economy standards. The U.S. Environmental Protection Agency (USEPA) administers the testing program that generates the fuel economy data.

National Energy Act of 1978

The National Energy Act of 1978 includes the Public Utility Regulatory Policies Act (Public Law 95-617), Energy Tax Act (Public Law 95-318), National Energy Conservation Policy Act (Public Law 95-619), Power Plant and Industrial Fuel Use Act (Public Law 95-620), and Natural Gas Policy Act (Public Law 95-621).

The intent of the National Energy Act was to promote greater use of renewable energy, provide residential consumers with energy conservation audits to encourage slower growth of electricity demand, and promote fuel efficiency. The Public Utility Regulatory Policies Act created a market for nonutility electric power producers to permit independent power producers to connect to their lines and to pay for the electricity that was delivered.

The Energy Tax Act promoted fuel efficiency and renewable energy through taxes and tax credits. The National Energy Conservation Policy Act required utilities to provide residential consumers with energy conservation audits and other services to encourage slower growth of electricity demand.

Energy Policy Acts of 1992 and 2005

The Energy Policy Act of 1992 was enacted to reduce dependence on imported petroleum and improve air quality by addressing all aspects of energy supply and demand, including alternative fuels, renewable energy, and energy efficiency. This law requires certain federal, state, and local government and private fleets to purchase alternate fuel vehicles. The act also defines “alternative fuels” to include fuels such as ethanol, natural gas, propane, hydrogen, electricity, and biodiesel.

The Energy Policy Act of 2005 was enacted on August 8, 2005. This law set federal energy management requirements for energy-efficient product procurement, energy savings performance contracts, building performance standards, renewable energy requirements, and use of alternative fuels. The Energy Policy Act of 2005 also amends existing regulations, including fuel economy testing procedures.

Energy Independence and Security Act of 2007

Signed into law in December 2007, the Energy Independence and Security Act was enacted to increase the production of clean renewable fuels; increase the efficiency of products, buildings, and vehicles; improve the federal government’s energy performance; and increase U.S. energy security, develop renewable fuel production, and improve vehicle fuel economy. The Energy Independence and Security Act included the first increase in fuel economy standards for passenger cars since 1975. The act also included a new energy grant program for use by local governments in implementing energy-efficiency initiatives, as well as a variety of green building incentives and programs.

Executive Order 13514

On October 5, 2009, President Barack Obama signed Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance (Title 3, Section 13514 of the Code of Federal Regulations). The executive order set sustainability goals for federal agencies and focuses on improving their environmental, energy, and economic performance. The executive order required agencies to meet a number of energy, water, and waste reduction targets.

Light-Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards

On May 7, 2010, the final Light-Duty Vehicle Greenhouse Gas (GHG) Emissions Standards and Corporate Average Fuel Economy Standards were published in the Federal Register. Phase 1 of the emissions standards required that vehicles from model years 2012 through 2016 meet an estimated combined average emissions level of 250 grams of carbon dioxide (CO₂) per mile, which is equivalent to 35.5 miles per gallon, if the automobile industry were to meet this CO₂ level solely through fuel economy improvements.

On August 28, 2012, the U.S. Department of Transportation (USDOT) and USEPA issued a joint Final Rulemaking requiring additional federal GHG and fuel economy standards for Phase 2 of the emissions standards for model years 2017 through 2025 passenger cars and light-duty trucks. The standards would require these vehicles to meet an estimated combined average emissions level of 163 grams of CO₂ per mile in model year 2025, which is equivalent to 54.5 miles per gallon, if the improvements were made solely through fuel efficiency. However, on April 2, 2018, USEPA issued a Mid-term Evaluation Final Determination, which finds that the

model years 2022 through 2025 emissions standards are not appropriate and should be revised. This Mid-term Evaluation is not a final agency action; rather, this determination leads to initiation of a rulemaking to adopt new standards (USEPA 2018).

On April 5, 2019, the administration of California Governor Gavin Newsom and the California Air Resources Board filed a lawsuit against the National Highway Traffic and Safety Administration and USEPA to compel the two federal agencies to provide the underlying data and analysis used to support a rollback of the federal vehicle emission standards. The California Air Resources Board estimates that if California were required to follow the federal rollback proposal, GHG emissions could increase by almost 15 million metric tons per year by 2025 (California Office of the Governor 2019).

Renewable Fuel Standard Program

Created by the Energy Policy Act of 2005, which amended the Clean Air Act, the Renewable Fuel Standard Program established requirements to replace certain volumes of petroleum-based fuels with renewable fuels. The four renewable fuel types accepted as part of the Renewable Fuel Standard Program are biomass-based diesel, cellulosic biofuel, advanced biofuel, and total renewable fuel. The 2007 Energy Independence and Security Act expanded the program and its requirements to include long-term goals of using 36 billion gallons of renewable fuels and extending annual renewable-fuel volume requirements to year 2022. “Obligated parties,” such as refiners and importers of gasoline or diesel fuel must meet specific blending requirements for the four renewable fuel types. USEPA implements the program in consultation with U.S. Departments of Agriculture and Energy. The obligated parties are required to demonstrate their compliance with the Renewable Fuel Standard Program.

State

Senate Bills 1078 and 107, Executive Orders S-14-08 and S-21-09, and Senate Bills 350 and 100

Senate Bill (SB) 1078 (Chapter 516, Statutes of 2002) required retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20 percent of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010.

Executive Order S-14-08 expanded the state’s Renewables Portfolio Standard to 33 percent renewable power by 2020. Executive Order S-21-09 directs the California Air Resources Board, under its AB 32 authority, to enact regulations to help the state meet its Renewables Portfolio Standard goal of 33 percent renewable energy by 2020.

The 33 percent-by-2020 goal and requirements were codified in April 2011 with SB X1-2. This new Renewables Portfolio Standard applies to all electricity retailers in the state, including publicly-owned utilities, investor-owned utilities, electricity service providers, and community choice aggregators. SB 350 (2015) increased the renewable-source requirement to 50 percent by 2030. This was followed by SB 100 in 2018, which further increased the Renewables Portfolio Standard to 60 percent by 2030 and added the requirement that all of the state’s electricity come from carbon-free resources by 2045.

California Green Building Standards Code

In January 2010, the State of California adopted the California Green Building Standards Code, which establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include a set of minimum requirements and more rigorous voluntary measures for new construction projects to achieve specific green building performance levels. This code went into effect as part of local jurisdictions' building codes on January 1, 2011. The 2019 California Building Standards Code (Cal. Code Regs., Title 24) was published July 1, 2019, with an effective date of January 1, 2020. The City of Beverly Hills has adopted the 2019 editions of the California Building Standards Code, including the Green Building Standards Code.

Local

City of Beverly Hills

In February 2009, the City of Beverly Hills released the Sustainable City Plan, which is a toolkit to help address sustainability issues. The Sustainable City Plan does not direct the implementation of any specific actions but provides a list of potential programs and the foundation on which the City can build a unified sustainability strategy. The Sustainable City Plan includes the following policies for energy efficiency in City operations and Citywide (City of Beverly Hills 2009):

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

Los Angeles County Metropolitan Transportation Authority

In 2019, Metro released the 2019 Energy and Resource Report, a yearly report that analyzes the sustainability and environmental performance of its operational activities (Metro 2019). The Energy and Resource Report summarizes Metro's 2018 performance across 10 sustainability indicators, including operational efficiency (unlinked passenger trips, vehicle miles traveled (VMT), operating expenses); air quality (criteria pollutant emissions); climate (GHG emissions, GHG displacement); energy use; water use; and waste (total solid waste, diversion from landfill). Since 2017, Metro has reduced energy use and increased waste diversion from landfills, even as the system is expanding.

3.5.2 Methodology and CEQA Thresholds

Methodology

This section describes the approach used to prepare the analysis of the potential effects of the project related to energy. The evaluation of potential energy impacts and energy demand was calculated based on the California Emissions Estimator Model (CalEEMod), Version 2016.3.2 and energy consumption data and assumptions pertaining to the Project and Project

Alternatives. (See Section 3.7, Greenhouse Gas Emissions, for further discussion of CalEEMod and indirect GHG emissions associated with energy consumption.)

The Project and Project Alternatives would require transportation energy for construction equipment fuel and power, and worker, haul, and delivery trips. Estimates of future transportation energy demand depend on a variety of factors, such as fuel prices, vehicle technologies and prices, regulatory requirements, and consumer demand and preferences. This section uses vehicle miles traveled information developed to support the air quality and GHG emissions analyses of this EIR (Sections 3.2 and 3.7, respectively).

The purpose of the Project and Project Alternatives is to provide an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard thereby delivering improved and convenient public access to the Beverly Hills Business Triangle. The Project is expected to improve pedestrian flow by providing more than one entrance/exit to avoid bottlenecks at peak hours. Because the need for the Project is to provide convenient pedestrian access to the northern side of the Wilshire/Rodeo Station, the Project is not anticipated to result in an increase in vehicle trips or vehicle miles traveled. Therefore, operational energy consumption would be limited to electricity usage for lighting and operation of elevators and escalators. It is estimated that a typical Metro station consumes approximately 51,290 kilowatt hours (kWh), or 175 million British thermal units (Btu) per year (FTA & Metro 2010). Since the Project would not construct a typical station, but rather a station portal entrance, this analysis scaled down the energy consumption based on the footprint of the Project and Project Alternatives. The analysis assumed the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative would consume approximately 9,898, 8,719, and 6,667 kWh per year, respectively.

Energy efficiency is a possible indicator of environmental impacts. The actual adverse physical environmental effects of energy use and the efficiency of energy use are detailed throughout this EIR in the environmental topic-specific sections. For example, the use of energy for transportation leads to air pollutant emissions, the impacts of which are addressed in Section 3.2, Air Quality, of this EIR. The use of energy for electricity leads to indirect GHG emissions, the impacts of which are addressed in Section 3.7, Greenhouse Gas Emissions, of this EIR. There is no physical environmental effect associated with energy use that is not addressed in the environmental topic-specific sections of this EIR.

CEQA Thresholds

An impact is considered significant if the project would:

- 1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and/or
- 2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

3.5.3 Existing Conditions

In 2018, California generated a total of 285,488 gigawatt-hours of electricity, of which approximately 194,842 gigawatt-hours were generated in-state (CEC 2019a). Transportation is the largest energy-consuming sector in California, accounting for approximately 40 percent of all energy use in the state (EIA 2019). More motor vehicles are registered in California than in any

other state, and commute times in California are among the longest in the country (EIA 2020). Types of transportation fuel have diversified in California and elsewhere. Historically, gasoline and diesel fuel accounted for nearly all demand; now, however, numerous options are available, including ethanol, natural gas, electricity, and hydrogen. Despite advancements in alternative fuels and clean-vehicle technologies, gasoline and diesel remain the primary fuels used for transportation in California, with 15.1 billion gallons of gasoline and 4.2 billion gallons of diesel consumed in 2015 (CEC 2019b, 2019c).

Since 2013, Metro has steadily reduced energy consumption through conservation measures, efficient building design, and improved fuel efficiency. In 2018 alone, Metro reduced total energy consumption by 7.9 percent compared to 2017 as a result of reduced vehicle fuel consumption by buses and support vehicles. In 2018, 31 percent of Metro's electricity came from renewable energy sources, including its own solar photovoltaic systems. These strategies actively reduce GHG emissions, 95 percent of which are derived from energy use (Metro 2019). In 2018, Metro consumed approximately 52 Megajoules per vehicle revenue mile, including energy from facilities, rail propulsion, and vehicle fuel (Metro 2019).

3.5.4 Impact Evaluation

Impact ENE-1. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Therefore, no potentially significant environmental impact would occur related to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

The Project and Project Alternatives

Construction Impacts

Implementation of the Project and Project Alternatives would increase energy consumption for the duration of construction in the form of electricity, natural gas, and fossil fuels (e.g., gasoline, diesel fuel). Transportation energy use during construction would come from the transport and use of construction equipment (off-road), delivery and haul trucks (on-road), and construction employee passenger vehicles (on-road). Construction-related transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. The majority of construction equipment during excavation, site work, building construction, and paving would be gas or diesel powered. The use of fuel by on-road and off-road vehicles would be temporary and would fluctuate according to the phase of construction. Construction fuel use for the Project and Project Alternatives would cease upon completion of project construction.

Table 3.5-1 presents the total fuel consumption anticipated for proposed construction activities for the Project and Project Alternatives. The information in these tables is based on the

CalEEMod emissions calculations for proposed construction activities and application of the U.S. Energy Information Administration's CO₂ emissions coefficients (EIA 2016) to estimate fuel consumption for construction activities.

Table 3.5-1 Project and Project Alternatives Construction Fuel Consumption, Total and Amortized over 30 Years

Alternative	Source	MT CO ₂ e/ Year ^a	Fuel Type	Factor (MT CO ₂ /Gallon) ^b	Gallons
Project	Off-Road Equipment	1,120	Diesel	0.01016	110,245
	Hauling	379	Diesel	0.01016	37,258
	Vendor	58	Diesel	0.01016	5,743
	Workers	93	Gasoline	0.008887	10,518
Total Gallons				Diesel	153,246
				Gasoline	10,518
Amortized Demands (over 30 years¹)				Diesel	5,108
				Gasoline	351
Cañon Drive-Half Portal Alternative	Off-Road Equipment	1,120	Diesel	0.01016	110,245
	Hauling	315	Diesel	0.01016	31,048
	Vendor	52	Diesel	0.01016	5,125
	Workers	86	Gasoline	0.008887	9,623
Total Gallons				Diesel	146,418
				Gasoline	9,623
Amortized Demands (over 30 years¹)				Diesel	4,881
				Gasoline	321
Cañon Drive Staging Yard Alternative	Off-Road Equipment	1,122	Diesel	0.01016	110,385
	Hauling	249	Diesel	0.01016	24,536
	Vendor	35	Diesel	0.01016	3,451
	Workers	69	Gasoline	0.008887	7,713
Total Gallons				Diesel	138,372
				Gasoline	7,713
Amortized Demands (over 30 years¹)				Diesel	4,612
				Gasoline	257
Notes:					
CO ₂ = carbon dioxide; CO ₂ e = carbon dioxide equivalent; MT = metric tons					
¹ Assumed amortization period is 30 years, based on the typically assumed project lifetime. Air districts in California (e.g., Sacramento Metropolitan Air Quality Management District 2018, South Coast Air Quality Management District 2008, San Luis Obispo County Air Pollution Control District 2012) recommend amortizing GHG emissions from construction activities over a project's operational lifetime.					
Sources: ^a Modeled by AECOM in 2020, ^b EIA 2016					

Table 3.5-2 presents the annual energy consumption as a result of the fuel used during construction of the Project and Project Alternatives. The annual energy consumption associated with construction of the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging

Table 3.5-2 Project and Project Alternatives Construction-Related Energy Requirements

Alternative	Fuel Type	Energy Requirement ^a	Unit	Annual Energy Consumption (MMBtu) ^b
Project	Diesel	5,108	gallons/year	705
Project	Gasoline	351	gallons/year	44
Total				749
Cañon Drive-Half Portal Alternative	Diesel	4,881	gallons/year	674
Cañon Drive-Half Portal Alternative	Gasoline	321	gallons/year	40
Total				714
Cañon Drive Staging Yard Alternative	Diesel	4,612	gallons/year	637
Cañon Drive Staging Yard Alternative	Gasoline	257	gallons/year	32
Total				669
Notes:				
MMBtu = million British thermal units				
Totals may not add due to rounding.				
Sources: ^a Estimated by AECOM in 2020, ^b TCR 2018.				

Yard Alternative (including transportation fuel use by off-road equipment, worker vehicle trips, and material delivery trips) would be approximately 749, 714, and 669 million British thermal units (MMBtu), respectively. Based on the anticipated phasing of the Project and Project Alternatives, temporary nature of construction, and project type, the Project would not include unusual characteristics that would necessitate the use of construction equipment that is less energy efficient than at comparable construction sites.

Energy consumption during construction activities would be temporary and relatively short term, while the Project and the Project Alternatives would operate for many years into the future. While this section discloses an estimate of temporary, construction-related energy demand, the long-term implications are essential for understanding the degree to which the Project and the Project Alternatives would result in wasteful or inefficient use of energy. To the contrary, the Project and the Project Alternatives would facilitate a reduction in energy demand—the Project and the Project Alternatives would encourage the use of transit and reduce automobile vehicle miles traveled in the region, allowing the means of achieving goals, such as decreasing reliance on fossil fuels and decreasing overall per capita energy consumption, identified within Appendix F (Energy Conservation) of the CEQA Guidelines. As noted, transportation is the largest energy-consuming sector in California; therefore, projects that reduce transportation energy demand are essential in promoting energy conservation and other objectives embodied in Appendix F of the CEQA Guidelines. The actual environmental effects of energy use and the efficiency of energy use for construction activities leads to criteria pollutant and GHG emissions, the impacts of which are addressed in Sections 3.2, Air Quality and 3.7, Greenhouse Gas Emissions, respectively.

Per Metro's Construction and Demolition Debris Recycling and Reuse Policy, the Project and Project Alternatives would also give preference to recyclable and recycled products in the selection of construction materials and ensure that facilities used for disposal and recycling are complying with the applicable federal, state, or local rules and regulations (Metro 2007). As such, it is expected that fuel consumption associated with construction of the Project and Project Alternatives would not be inefficient, wasteful, or unnecessary.

While the Project and the Project Alternatives would require energy during temporary construction activities, this would facilitate long-term, operational reduction in energy demand in the largest energy-consuming sector: transportation. Mitigation Measures AIR-A and AIR-B, included in Section 3.2, Air Quality, would require that the contractor not unnecessarily idle heavy equipment and would require contractors to maintain and tune engines per manufacturer's specifications. Due to this, and the application of energy-reducing practices employed during construction, construction impacts related to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant.

Operational Impacts

Following construction, the Project and Project Alternatives would consume energy associated with electricity for lighting and escalator and elevator use. It is anticipated that the Project and Project Alternatives would install light fixtures equipped with LED lights, which consume less energy and also result in lower maintenance costs than the traditional street lights that exist throughout the City (City of Beverly Hills 2018). In addition, the Project and Project Alternatives are not anticipated to result in an increase in vehicle trips. On the contrary, implementation of the Project and Project Alternatives is anticipated to reduce vehicle miles traveled in the region by encouraging people to take public transit. However, this analysis is conservative and does not quantify the avoided regional energy consumption associated with the reduction in fossil fuel-based transportation fuel related to the decrease in automobile vehicle miles traveled. Table 3.5-3 presents the energy requirement associated with operation of the Project and Project Alternatives.

Table 3.5-3 Project and Project Alternatives Operational Energy Requirements

Alternative	Energy Requirement ^a	Unit	Annual Energy Consumption (MMBtu)
Project	9,898	kWh/year	34
Cañon Drive-Half Portal Alternative	8,719	kWh/year	30
Cañon Drive Staging Yard Alternative	6,667	kWh/year	23
Notes:			
MMBtu = million British thermal units			
Sources: ^a Energy requirement estimated by scaling station energy consumption of 175 MMBtu to footprint of each Alternative.			

As shown in Table 3.5-3, the annual energy consumption associated with operation of the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative (e.g., electricity for lighting, elevator and escalator use) would be approximately 34, 30, and 23 MMBtu, respectively. The annual energy consumption associated with the Project and Project Alternatives presented in Table 3.5-3 is conservative, as it does not account for the avoided

energy consumption from the reduction in transportation fuel use associated with vehicle miles traveled in the region, as discussed in more detail below.

Implementation of the Project and Project Alternatives would provide an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard thereby delivering improved, convenient, and safe public access to the Beverly Hills Business Triangle. The Project and Project Alternatives are expected to improve pedestrian flow by providing more than one entrance/exit to avoid bottlenecks at peak hours. Because the need for the Project is to provide convenient pedestrian access to the northern side of the Wilshire/Rodeo Station, the Project and Project Alternatives are not anticipated to result in an increase in vehicle trips or vehicle miles traveled. As a result, the Project and Project Alternatives would promote the use of transit and enhance the pedestrian network; thus, reducing transportation fuel use and the associated regional energy consumption by reducing the amount of vehicle miles traveled, and the number of cars that operate in congested traffic conditions.

According to the U.S. Department of Energy (DOE), transit trains have a national average of 51.6 passenger-miles per gallon (pmpg), compared to cars that have 36 pmpg (DOE 2018). Pmpg is a metric for comparing mass transit and rideshare with typical passenger vehicle travel. Transportation system efficiency increases as the number of passengers increases or as the vehicle fuel economy increases for each transportation mode. In addition, public transportation also provides congestion relief and reduces transportation fuel associated with idling vehicles. Therefore, considering that the Project and Project Alternatives would encourage use of public transit and potentially reduce single passenger vehicles and the associated transportation fuel use, the Project and Project Alternatives would not result in potentially significant environmental impact on energy consumption. The Project and Project Alternatives would also encourage a decrease in reliance on fossil fuels and would reduce regional per-capita energy consumption, consistent with the objectives described in Appendix F of the CEQA Guidelines. Because the Project and the Project Alternatives do not have unusual design or operational features that would have unusual high energy demand, and because they would reduce energy demand in the largest energy-consuming sector statewide (transportation), operational impacts related to wasteful, inefficient, or unnecessary consumption of energy resources would be less than significant.

Impact ENE-2. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

No-Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. The No Project Alternative would not conflict with state local plans for renewable energy or energy efficiency. Therefore, no impact would occur related to conflicting with or obstructing a state or local plan for renewable energy or energy efficiency.

The Project and Project Alternatives

Construction and Operational Impacts

As discussed in Section 3.7, Greenhouse Gas Emissions, the 2017 ARB Climate Change Scoping Plan identifies the transportation sustainability sector to be a key area for fossil fuel

consumption reduction strategies. ARB calls for encouraging public transit use and increasing public transportation opportunities in efforts to decrease fossil fuel demand from light-duty combustion vehicles (ARB 2017). Installation of an additional portal to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would deliver improved, convenient, and safe public access to the Beverly Hills Business Triangle, thus encouraging increased ridership and reducing vehicle trip emissions from passengers who would otherwise drive. Therefore, the Project and Project Alternatives would be consistent with the energy conservation measures and strategies identified in the 2017 ARB Climate Change Scoping Plan.

Additionally, the SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a plan that integrates land use and transportation in efforts for the region to grow sustainably. The sustainable themes include transportation choice and making transit and other active modes of transportation, such as walking and bicycling, more attractive and accessible options to driving to encourage fuel conservation and trip reductions (SCAG 2016). As such, the Project and Project Alternatives would also be consistent with the energy conservation strategies in the SCAG RTP/SCS.

Additionally, the City of Beverly Hills Sustainable City Plan also calls for minimizing the use of nonrenewable, polluting transportation fuels as an action for improving energy efficiency in City operations and Citywide. The Project and Project Alternatives would support this goal by providing improved, convenient, and safe public access to transit and the Beverly Hills Business Triangle, which would reduce vehicles miles traveled from passenger vehicles in the region. In addition, consistent with City efforts to convert existing street lights to LED and the City Sustainable City Plan measure to maximize energy efficiency, such as the installation of efficient lighting, the Project and Project Alternatives would install light fixtures equipped with LED lights. LED is a highly energy efficient lighting technology that consumes less electricity, than incandescent lighting (DOE 2019).

As such, because the Project and Project Alternatives would encourage a form of transportation that is not dependent on traditional transportation fuels (i.e., diesel and gas), the Project and Project Alternatives would not conflict with state or local plans for renewable energy or energy efficiency. In addition, as described in Section 3.7, Greenhouse Gas Emissions, per the Renewables Portfolio Standard goals mandated by SB 100, SCE will continue to reduce the carbon content of electricity and increase its energy supply from renewable sources. Therefore, construction and operational impacts related to conflicting with or obstructing a state or local plan for renewable energy or energy efficiency would be less than significant.

3.5.5 Mitigation Measures

As described in the MOA between the City of Beverly Hills and Metro, the contractor would be required to implement the following mitigation measures to even further reduce energy consumption as feasible. As previously mentioned, these mitigation measures are originally included in Section 3.2, Air Quality.

Project and Project Alternatives

AIR-A: Construction contractors shall be required to not unnecessarily idle heavy equipment.

AIR-B: Construction contractors shall maintain and tune engines per manufacturer's specifications to perform at USEPA certification where applicable, and to perform

at verified standards applicable to retrofit technologies. Construction contractors shall also be subject to periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.

3.5.6 Impacts after Mitigation

Implementation of Mitigation Measures AIR-A and AIR-B would further reduce energy consumption below the threshold by limiting idling of heavy construction equipment and requiring maintenance and tuning of engines. With implementation of mitigation, construction energy impacts would be less than significant.

3.5.7 Cumulative Impacts

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. The No Project Alternative would not have a cumulatively considerable impact.

The Project and Project Alternatives

The Project and Project Alternatives would utilize energy during construction and operational activity. The energy expended to construct the Project and Project Alternatives is a temporary consumption impact that is not considered adverse. The Project and Project Alternatives would decrease regional energy consumption and would result in a beneficial energy impact by reducing automobile vehicle miles traveled and the associated fossil fuel-based energy consumption. The reduction in automobile travel also reduces vehicle congestion, which reduces energy consumption associated with vehicle idling and vehicle travel at slower speeds. As such, the Project and Project Alternatives would result in beneficial energy impacts and would not have a cumulatively considerable impact.

3.6 Geology, Soils, and Mineral Resources

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to geology, soils, and mineral resources. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. The section describes the affected environment and analyzes the environmental consequences of the Project and Project Alternatives and, if applicable, provides mitigation measures.

3.6.1 Regulatory Setting

Federal

Uniform Building Code

The Uniform Building Code (UBC) defines different regions of the United States and ranks them according to their seismic hazard potential. The four types of these regions are Seismic Zones 1 through 4, with Zone 1 having the least seismic potential and Zone 4 having the highest seismic potential. The City of Beverly Hills is located in Seismic Zone 4.

State

Alquist-Priolo Earthquake Fault Zoning Act

The purpose of the Alquist-Priolo Earthquake Fault Zoning Act of 1972 is “to regulate development near active faults so as to mitigate the hazard of surface fault rupture.” The State Geologist (chief of the Division of Mines and Geology) is required to delineate Earthquake Fault Zones along known active faults. Cities and counties affected by the zones must regulate certain development within the zones. They must withhold development permits for sites within the zones until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting. Typically, structures for human occupancy are not allowed within 50 feet of the trace of an active fault.

Occupational Safety and Health Act

Site safety requirements are generally based on specifications of the Occupational Safety and Health Administration (OSHA), in accordance with the Occupational Safety and Health Act (1970, amended in 1998). OSHA standards relevant to geologic resources are focused on worker safety during excavation (see CFR Section 29 Part 1926).

California Building Code

The state of California provides a minimum standard for building design through the California Building Code (CBC). The CBC is based on the UBC, with amendments for California conditions.

Chapter 23 of the CBC contains specific requirements for seismic safety. Chapter 29 of the CBC regulates excavation, foundations, and retaining walls. Chapter 33 of the CBC contains specific

requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Chapter 70 of the CBC regulates grading activities, including drainage and erosion control. Construction activities are subject to occupational safety standards for excavation, shoring, and trenching as specified in the State of California OSHA regulations (Title 8 of the California Code of Regulations [CCR]) and in Section A33 of the CBC.

Chapter 16A, Division IV of the CBC, entitled “Earthquake Design,” states that the “purpose of the earthquake provisions herein is primarily to safeguard against major structural failures or loss of life.” The CBC and UBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system, height, and seismic zoning. Seismic zones are mapped areas (Figure 16A-2 of the CBC and Figure 16-2 of the UBC) that are based on proximity to known active faults and the potential for future earthquakes and intensity of seismic shaking. Seismic zones range from 0 to 4, with areas mapped as Zone 4 being potentially subject to the highest accelerations due to seismic shaking and the shortest recurrence intervals.

Regional and Local

Beverly Hills General Plan Safety Element

The City of Beverly Hills General Plan, amended on January 12, 2010, provides a comprehensive framework that guides the City’s development through 2025. The Safety Element guides public health and safety, and addresses fire, flood, geologic, and seismic hazards; hazardous materials; and disaster preparedness. The following goals and policies from the Safety Elements are applicable to geology, soils, and mineral resources.

Goal S 5: Protection from Geologic Hazards.

For a system that impacts geologic resources:

S 5.1 Safety Standards. Require new development and redevelopment to be in compliance with seismic and geologic hazard safety standards, including design and construction standards that regulate land use in areas known to have or to potentially have, significant seismic and/or other geologic hazards. (Imp. 2.2, 2.4)

S 5.5 Hazard Mitigation Action Plan. Review and evaluate annually progress in implementing the City’s Hazard Mitigation Action Plan, and revise as needed for compliance with local, State and Federal requirements every five years. Ensure that mitigation strategies addressing seismic and geologic hazards are implemented where feasible, and that effective public outreach and education is included. (Imp. 1.3)

Southern California Association of Governments

Regional, multi-agency planning efforts are summarized by the Southern California Association of Governments (SCAG 1996). Among policies aimed at managing regional growth, and relevant to geologic resources, is the following:

- Policy 3.22 – Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood and seismic hazards.

Seismic Hazards Mapping Act

The California Department of Conservation, Division of Mines and Geology (CDMG; now the California Geological Survey [CGS]) also provides guidance with regard to seismic hazards. Under CDMG's Seismic Hazards Mapping Act, seismic hazard zones are to be identified and mapped to assist local governments in land use planning. The intent of this publication is to protect the public from the effects of strong ground shaking, liquefaction, landslides, ground failure, or other hazards caused by earthquakes. In addition, CDMG's Special Publications 117, "Guidelines for Evaluating and Mitigating Seismic Hazards in California," provides guidance for the evaluation and mitigation of earthquake-related hazards for projects within designated zones of required investigations.

Seismic Safety Program

The purpose of this program is to promote public safety and welfare by reducing the risk of death or injury that may result from the effects of earthquakes on existing unreinforced masonry bearing wall buildings. The provisions of this program are minimum standards for structural seismic resistance and established primarily to reduce the risk of loss of life or injury. All buildings having at least one reinforced masonry bearing wall shall comply with the requirements of this program except:

- Detached one- or two-family dwellings and apartment houses containing less than five units;
- School buildings inspected for building safety purposes by the state of California Historic buildings; or
- Structures which have been listed on the state or national historic building register, or have received a rating of 4E or better by the Beverly Hills historic resources survey and which are seismically strengthened according to the provisions of Part 8 of Title 24 of the CCR (state Historical Building Code).

Beverly Hills Municipal Code (BHMC)

Implementation of earthquake mitigation policies most often takes place at the local government level. BHMC Section 9-1.201 includes the adoption of the UBC. The City of Beverly Hills Community Development Department's Development Services Division enforces building codes pertaining to earthquake hazards. The City of Beverly Hills Building Code sets the minimum design and construction standards for construction. In November 2019, the City adopted the most recent CBC, which is discussed above.

Surface Mining and Reclamation Act

Pursuant to the Surface Mining and Reclamation Act (P.R.C. 2710 et seq.), the State Mining and Geology Board identifies, in adopted regulations, areas of regional significance that are known to contain mineral deposits judged to be important in meeting the future needs of the area (P.R.C. 2426 and 2790; Title 14 P.R.C. 3350, et seq.). The State Mining and Geology Board also adopts state policy for the reclamation of mined lands and certifies local ordinances for the approval of reclamation plans as being consistent with state policies (P.R.C. 2755-2764, 2774 et seq.).

3.6.2 Methodology and CEQA Thresholds

Resource Study Area

The RSA for the Project and Project Alternatives includes the footprint of the area needed to construct, operate, and maintain all permanent project features, plus a quarter-mile buffer, at each location. The RSAs for the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative are shown in Figure 3.6-1.

Methodology

To determine the impacts to geology, soils, and mineral resources, existing data and historical information were evaluated. The following documents and agency websites were reviewed:

- City of Beverly Hills
 - General Plan and associated Technical Background Reports
 - Municipal Code
 - Community Development and Public Works department webpages
- Metro West Subway Extension Final EIS/EIR and Supplemental EIS
- U.S. Department of Conservation
 - Alquist-Priolo Earthquake Fault Zones
 - Geologic Maps
 - Landslide and Seismic Hazard Zone Maps
- Aerial photographs from Google Earth

The Project and Project Alternatives were analyzed for compliance with applicable regulations that function to describe existing geology, soil, and mineral conditions. Project activities were assessed to determine their potential impact on these resources during construction and operation. The Project and Project Alternatives were also analyzed for potential construction-related impacts and then analyzed against applicable significance criteria (as described below). Where a potentially significant impact would be anticipated, proposed mitigation measures to address these potential effects were developed as applicable.

CEQA Thresholds

An impact is considered significant if the project would:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - a. 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;

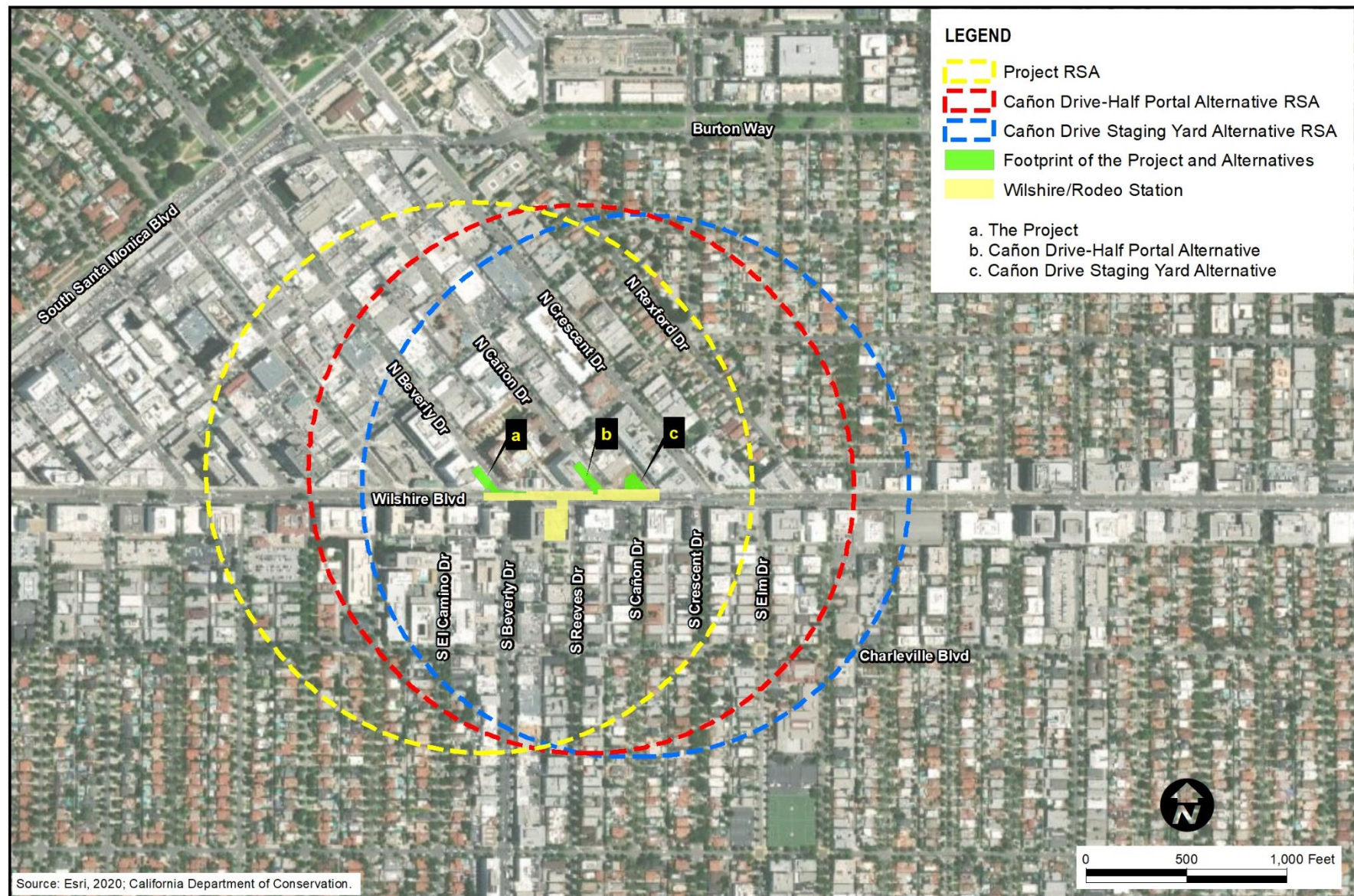


Figure 3.6-1 Geology, Soils, and Minerals RSA Boundaries for the Project and Project Alternatives

- b. Strong seismic ground shaking;
 - c. Seismic-related ground failure, including liquefaction; and/or
 - d. Landslides;
- 2. Result in substantial soil erosion or the loss of topsoil;
- 3. 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;
- 4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property;
- 5. 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 wastewater;
- 6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature;
- 7. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state; and/or
- 8. 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.

3.6.3 Existing Conditions

Fault Zones

The nearest earthquake fault to the Project and Project Alternatives is the Beverly Hills fault zone, which is approximately 500 feet north of the Project. As delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, the Beverly Hills fault zone traverses all three of the RSAs, as shown in Figure 3.6-2 below. An Earthquake Fault Zone typically denotes a Holocene-active fault (ruptured in the last 11,700 years) that may pose a risk of ground failure damage to existing or future structures within a parcel. If this parcel is subdivided and/or developed such that it meets the definition of a “Project” under the Alquist-Priolo Earthquake Fault Zoning Act (PRC, Division 2, Chapter 7.5), a fault investigation by a California Professional Geologist would be required before that project can be approved by the lead agency (State of California Department of Conservation 2019a). Not all of the area within a hazard zone will experience damaging ground failure in future earthquakes. Site-specific geologic/geotechnical investigations are the best way to determine if these hazards could affect structures on a parcel.

Ground Shaking

A major cause of structural damage that results from earthquakes is ground shaking. The amount of motion can vary from zero to forceful depending upon the distance to the fault, the magnitude of the earthquake, and the local geology. Greater movement can be expected at sites located on poorly consolidated material such as alluvium located near the source of the earthquake epicenter or in response to an earthquake of great magnitude. Strong ground shaking can damage large freeway overpasses and unreinforced masonry buildings. It can also trigger a variety of secondary hazards such as liquefaction, landslides, fire, and dam failure.

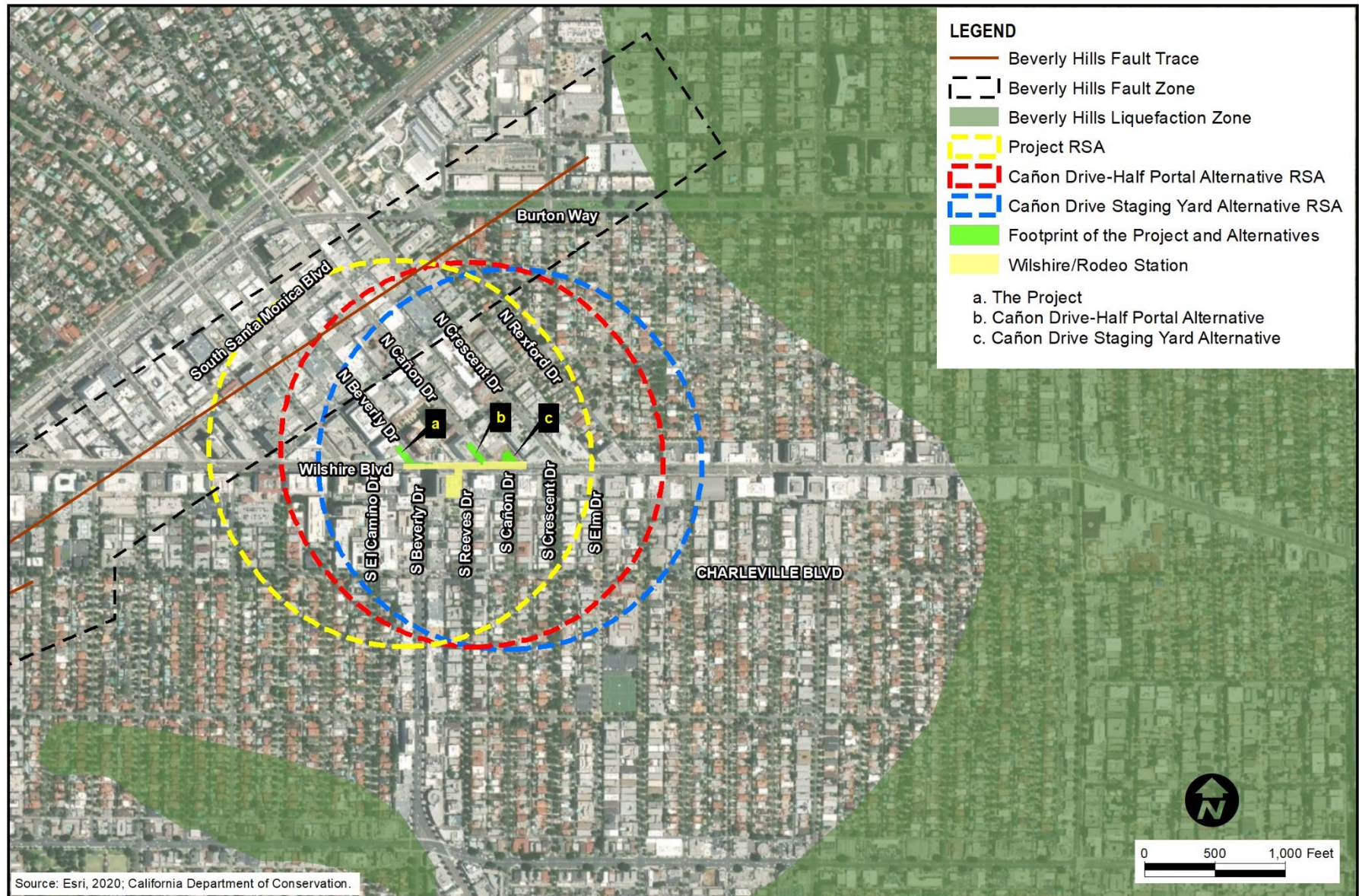


Figure 3.6-2 Beverly Hills Fault Zone and Liquefaction Map

The amount of damage to a building does not depend solely on how hard it is shaken. In general, smaller buildings such as houses are damaged more by higher frequencies, and houses must be relatively close to the epicenter to be severely damaged. Larger structures such as high-rise buildings are damaged more by lower frequencies and will be more noticeably affected by the largest earthquakes, even at considerable distances. In addition to regional aspects of the earthquake hazards, there are location-specific hazards that can cause additional damage as described below.

Seismically Induced Settlement

Strong ground shaking can cause the densification of soils, resulting in local or regional settlement of the ground surface. During strong ground shaking, soil grains may become more tightly packed due to the collapse of voids or pore spaces. This type of failure typically occurs in loose, granular, cohesionless soil and can occur in either wet or dry conditions. According to the State of California Department of Conservation, Beverly Hills Quadrangle shown in Figure 3.6-2, the Project and Project Alternatives are not located in an area identified as being susceptible to liquefaction; therefore, the risk of seismically-induced settlement is considered low.

Subsidence

Subsidence can occur as a result of excessive groundwater or petroleum withdrawals that cause the ground surface to sink (City of Beverly Hills 2005). It is essentially the loss of surface elevation due to the removal of subsurface support. The work associated with the Project and Project Alternatives would include dewatering, which falls into the category of types of activities that could contribute to the loss of subsurface support. The potential for subsidence as a result of dewatering is discussed in the sections below.

Soils and Geologic Hazards

The alluvial fans that underlie most of the City south of Sunset Boulevard consist of Quaternary debris generated from erosion of the Santa Monica Mountains. Soils that increase or expand when exposed to water are considered expansive soils. These soils are typically very fine grained (i.e., clays) and can expand from small fractions to multiples of their volume, depending on their clay mineralogy. Such expansion can cause structural damage to foundations and roads without proper structural engineering. Clay soils in Beverly Hills have potential for expansion, and swell and shrink with changes in moisture content (Hayes 1999).

The transitional area between the mountains and the coastal plain consists of alluvial fans that have developed from erosion of the Santa Monica Mountains. The alluvial fans slope approximately 2 to 3 percent in a southeast direction. The elevation in this transitional area is about 300 feet above mean sea level (City of Beverly Hills 2005). The southern portion of the City is located in a coastal plain of the Los Angeles Basin, which is part of the Peninsular Range geomorphic province. Most of the City is underlain by sedimentary rocks primarily dating from the Tertiary era (66 million years ago) (City of Beverly Hills 2005). The sedimentary rock is overlain with alluvial deposits of varying ages, but they are all within the Quaternary era (2 million years ago) (City of Beverly Hills 2005).

Geologic maps indicate that surficial deposits within the project area consist of younger Quaternary alluvium. Quaternary alluvium is among the most recent geologic deposits in the Los Angeles Basin and consists of river- and creek-born gravels, sand, silt, and clay. These

deposits are typically less than 10,000 years in age, dating to the Holocene epoch. Typically, these deposits are too young to contain significant fossil remains. Younger Quaternary alluvial deposits can be quite deep and may extend to the base of the proposed project excavations.

However, Older alluvium is anticipated to exist at an unknown depth below the younger alluvium. Older alluvium dates from between the transition between the Pleistocene and Holocene epochs, approximately 10,000 years ago, to up to approximately 1 million years old. Significant fossils, particularly mammal fossils, have been recovered from Older alluvial deposits within the Los Angeles Basin.

Paleontological Resources

No fossil localities are known to exist within the footprint of planned work. However, a literature review for the Purple Line Extension Project found that project excavations for the original Purple Line construction encountered fossil remains in Older Quaternary alluvium on Wilshire Boulevard both west and east of Beverly Drive. Pleistocene fossils of horse and artiodactyl (the order including hoofed animals such as cow, sheep, camel, and pig) were recovered from Older Quaternary alluvium in this vicinity (Metro 2010:5–9).

Liquefaction

Liquefaction refers to when surface soils, generally alluvial soils, become saturated with water. Ground shaking packs the sand grains closer together so that less pore space is available for the water. This increases the water pressure between the sand grains within the alluvium. These soils therefore become very wet and mobile causing foundations of structures to move, leading to varying degrees of structural damage. Generally, liquefaction occurs only below the water table; however, after liquefaction has developed, it can also move upward. Liquefaction susceptibility decreases with depth of the water table and compactness of the soil. As shown in Figure 3.6-2, the Project and Project Alternatives are not located in a liquefaction zone based on the City's Seismic Hazards map (City of Beverly Hills 2008).

Landslides

A landslide is defined as the movement of a mass of rock, debris, or earth flow down a slope. Landslides are a type of "mass wasting," which denotes any downslope movement of soil and rock under the direct influence of gravity. The term "landslide" encompasses events such as rock falls, topples, slides, spreads, and flows. Landslides can be initiated by rainfall, earthquakes, volcanic activity, changes in groundwater, disturbance, and change of a slope by man-made construction activities, or any combination of these factors (City of Beverly Hills 2019b). Landslides are often associated with earthquakes, but other factors such as slope, moisture content of the soil, and the composition of the subsurface geology also influence their occurrence. For example, heavy rains or improper grading may trigger a landslide. The hillside area of the City of Beverly Hills is the only sector subject to landslide potential and is outside of the combined RSAs.

Mineral Resources

Oil and Gas Production

The City of Beverly Hills has a history of hydrocarbon production in the form of oil and gas wells. Oil exploration and production started within what is now the city limits about 10 years before

the City was incorporated in 1914. Since 1967, various companies have produced hydrocarbons from the East Beverly Hills, San Vicente, and South Salt Lake oil fields.

The San Vicente and East Beverly Hills wells have been the most productive over the years. The combined RSAs are located in the San Vicente oil field (State of California Department of Conservation 2019b). As shown in Figure 3.6-3 Beverly Hills Oil Fields, the Project and Project Alternatives are within the San Vicente oil field; however, there are no active wells within any of the RSAs. The nearest active well is approximately 2,700 feet east of the Canon Drive Staging Yard Alternative. As of January 2001, the San Vicente field has produced a total of 20 million barrels of oil and 22.1 billion cubic feet of gas (City of Beverly Hills 2010).

3.6.4 Impact Evaluation

Impact GEO-1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- a. **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;**
- b. **Strong seismic ground shaking;**
- c. **Seismic-related ground failure, including liquefaction; and/or**
- d. **Landslides**

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. This work was previously analyzed and approved under a separate environmental review process. No impacts would occur related to a known earthquake fault, strong seismic ground shaking, ground rupture including liquefaction, and/or landslides beyond those identified in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

Construction Impacts

Fault Zones. The Beverly Hills fault zone traverses the Project and Project Alternatives RSAs as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. At its closest, the fault zone is approximately 500 feet north of the Project and Project Alternatives footprints, and therefore not within the Alquist-Priolo zone. No active faults are known to cross the Project or Project Alternatives footprints.

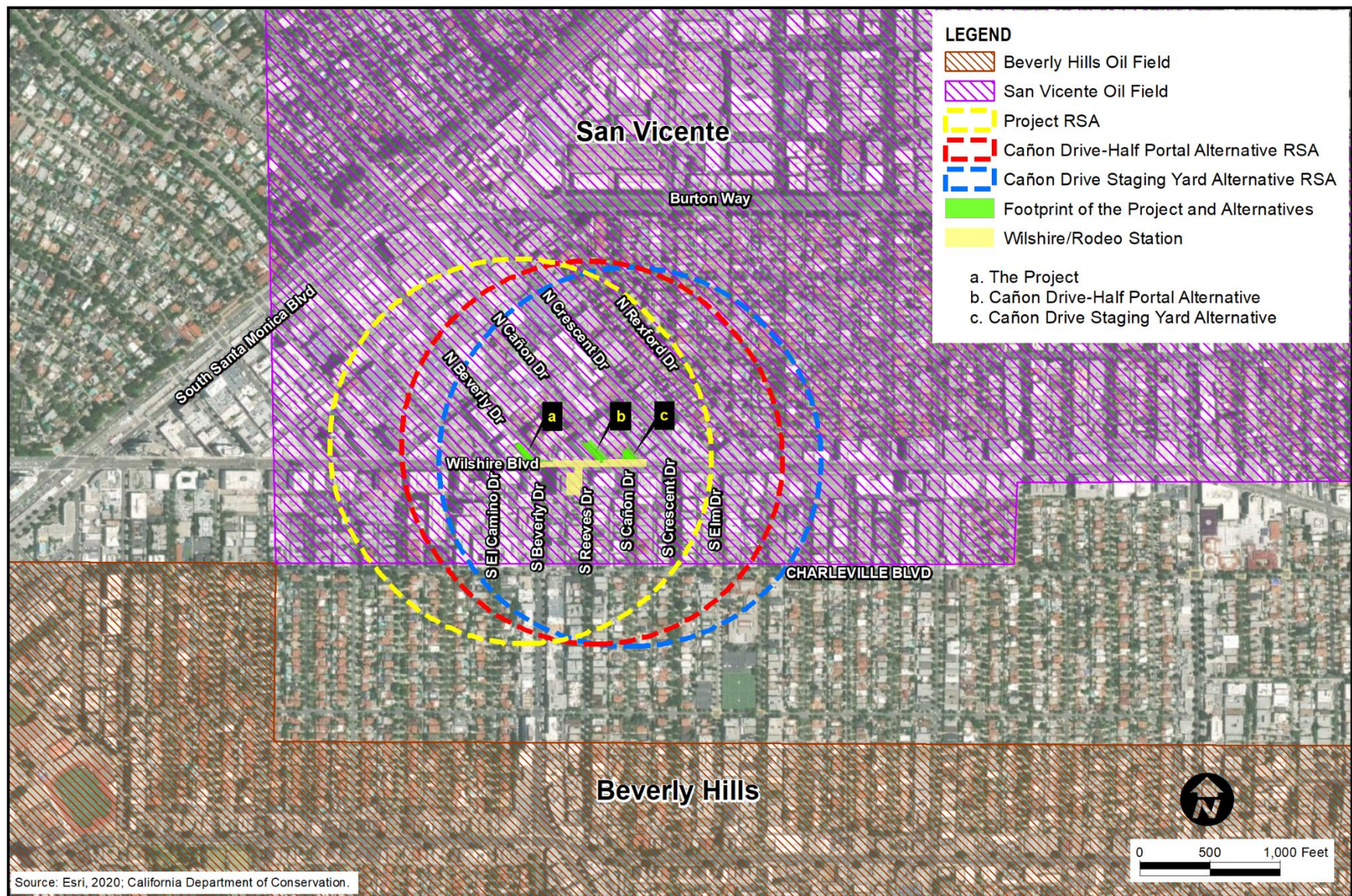


Figure 3.6-3 Beverly Hills Oil Fields

Project construction would include utility relocations, excavation, structure construction, and site restoration. Construction of the Project would adhere to Chapter 16A, Division IV of the CBC, entitled “Earthquake Design,” which states that the “purpose of the earthquake provisions herein is primarily to safeguard against major structural failures or loss of life.” The CBC and UBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The procedures and limitations for the design of structures are based on site characteristics, occupancy type, configuration, structural system, height, and seismic zoning. With compliance with the CBC and UBC regulations, the Project or the Project Alternatives would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault. Therefore, construction impacts related to rupture of a known earthquake fault would be less than significant.

Ground Shaking. The Project and Project Alternatives are located within the seismically active southern California region, and like all locations within the area, is subject to strong seismic ground shaking. The Project and Project Alternatives would be designed and constructed in accordance with the latest version of the applicable federal, state, and local codes relative to seismic criteria, including the UBC, CBC, and City Policy for Site-Specific Seismic Fault Investigations. The impact to people, buildings, or structures on the project site from strong seismic ground shaking would be reduced by the required conformance with applicable building codes and accepted engineering practices. With compliance with existing regulations, construction impacts as a result of strong seismic ground shaking would be less than significant.

Liquefaction. In certain areas, liquefaction can be a secondary effect of strong ground shaking. Liquefaction occurs primarily in saturated, loose, fine- to medium-grained sands, and most commonly occurs in areas where the groundwater table is less than 10 to 30 feet below the ground surface, although analysis is typically performed to a depth of 50 feet. The Project and Project Alternatives are not located in a liquefaction zone based on the City’s Seismic Hazards map (City of Beverly Hills 2008). Therefore, construction impacts related to liquefaction would be less than significant.

Landslides. The Project and Project Alternatives sites are relatively flat and not located within a Landslide Hazard Zone in the City’s Seismic Hazards Map. Therefore, the Project and Project Alternatives would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, construction impacts related to landslides would be less than significant.

Operational Impacts

The Beverly Hills fault zone traverses the Project and Project Alternatives RSAs as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map. At its closest, the fault zone is approximately 500 feet north of the Project and Project Alternatives footprints. No active faults are known to cross the Project or Project Alternatives footprints. As stated above, the Project and Project Alternatives would be subject to strong seismic ground shaking as the RSA is within 500 feet of the Beverly Hills Fault zone. Development in the City is required to adhere to the UBC and CBC. The impact to people, buildings, or structures on or near the Project and Project Alternatives sites from strong seismic ground shaking would be reduced by the required conformance with applicable building codes and accepted engineering practices. In addition, the Project and Project Alternatives would not be located within designated liquefaction or landslide hazard zones. The implementation of the Project and Project Alternatives would not introduce risk of loss, injury, or death as a result of rupture of a known earthquake fault, strong seismic

ground shaking, liquefaction, or landslides. Therefore, operational impacts related to these geologic hazards would be less than significant.

Impact GEO-2. Result in substantial soil erosion or the loss of topsoil.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. This work was previously analyzed and approved under a separate environmental review process. No impacts would occur related to soil erosion or loss of topsoil beyond those identified in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

Construction Impacts

The site for the Project and Project Alternatives is generally level, which limits the potential for substantial soil erosion. The grading and excavation phase when soils are exposed has the highest potential for erosion. However, the use of standard construction BMPs on the construction site, as required by BHMC Section 9-4-507 (City of Beverly Hills 2019a), would reduce any potentially significant soil erosion impacts. Such BMPs include use of plastic coverings on unprotected areas to eliminate erosion; removal of any sediments tracked offsite by construction vehicles; and use of temporary sediment barriers where necessary. With implementation of these BMPs, construction impacts related to soil erosion or loss of topsoil would be less than significant.

Operational Impacts

Once operational, the Project and the Project Alternatives would not result in soil erosion or the loss of topsoil. The area is urban and developed, with much of the surrounding area paved. The Project and the Project Alternatives would not include exposed or undeveloped lands. Therefore, construction impacts related to soil erosion or loss of topsoil would be less than significant.

Impact GEO-3. 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.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. This work was previously analyzed and approved under a separate environmental review process. No impacts would occur related to 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 beyond those identified in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

Construction Impacts

The Project and Project Alternatives do not have any conditions that pose unusual risks relating to soil or other potential secondary seismic hazards. Subsidence can occur as a result of excessive groundwater or petroleum withdrawals, which cause the ground surface to sink. Subsidence produces cracks in pavements, buildings, or other materials and typically impacts drains, foundations, and water pipes. Beverly Hills has experienced limited subsidence over the years, however, it is unknown if it is caused by fluid withdrawal or natural tectonic movement (City of Beverly Hills 2005).

Development in the City must adhere to the UBC and CBC, which regulate the design and construction of buildings, foundations, retaining walls, and other building elements to mitigate potential adverse soil conditions. However, the Project and Project Alternatives would utilize dewatering during construction; therefore, a potential exists for subsidence due to construction dewatering. To reduce the potential for subsidence, implementation of Mitigation Measure GEO-A would include geotechnical exploration methods such as the use of slurry walls, secant pile walls, and other methods to reduce potential settlement. With the implementation of mitigation, construction impacts related to a geologic unit or soil that is unstable, or that would become unstable as a result of the Project and Project Alternatives, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse, would be less than significant.

Operational Impacts

The Department of Conservation Landslide Inventory and Susceptibility map and Department of Conservation Liquefaction map do not identify any landslide or liquefaction hazards on the Project or Project Alternatives RSAs. Operation of the Project and Project Alternatives would not 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. Therefore, no operational impact would occur.

Impact GEO-4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. This work was previously analyzed and approved under a separate environmental review process. Expansive soils are primarily composed of clays, which increase in volume when water is absorbed and shrink when dry. No impacts would occur related to expansive soils beyond those identified in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

Construction Impacts

As discussed above, expansive soils are primarily composed of clays, which increase in volume when water is absorbed and shrink when dry. Expansive soils are of concern since building foundations may rise during the rainy season and fall during dry periods in response to the clay's action. If movement varies under different parts of the building, structural portions of the building may distort. Clay soils beneath the City have the potential to expand (City of Beverly Hills 2005). Construction of the Project and Project Alternatives would require adherence to the UBC and CBC, which account for and mitigate the effects of adverse soil conditions through the incorporation of design requirements. Specifically, CBC Section 3307.1 states that, "Adjoining public and private property shall be protected from damage during construction, remodeling and demolition work. Protection must be provided for footings, foundations, party walls, chimneys, skylights and roofs. Provisions shall be made to control water runoff and erosion during construction or demolition activities" (DGS 2016). The UBC employs a similar standard and states that, "Any person making or causing an excavation to be made exceeding twelve feet (12') in depth below the grade, shall protect the excavation so that the adjoining soil will not cave in or settle, and shall extend the foundation of any adjoining buildings below the depth of twelve feet (12') below grade at his own expense" (ICBO 1970/1997). With these requirements in place, construction impacts related to expansive soils would be less than significant.

Operational Impacts

The Project and Project Alternatives would be constructed in accordance with the UBC and CDC requirements to account for any adverse or expansive soil conditions. Therefore, operational impacts related to expansive soils would be less than significant.

Impact GEO-5. 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 wastewater.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. This work was previously analyzed and approved under a separate environmental review process. No impacts would occur related to the use of septic tanks or alternative wastewater disposal systems.

The Project and Project Alternatives

Construction and Operational Impacts

The construction and operation of the Project and Project Alternatives would be served by the City's wastewater disposal system. The Project and Project Alternatives do not include a septic system; therefore, no potential exists for effects due to soil incompatibility. Therefore, construction impacts related to the use of septic tanks or alternative wastewater disposal systems would be less than significant.

Impact GEO-6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. This work was previously analyzed and approved under a separate environmental review process. No impacts would occur related to directly or indirectly destroying unique paleontological resources or geologic features beyond those identified in the Purple Line Extension EIR.

The Project and Project Alternatives

Construction Impacts

The Project and Project Alternatives sites have been previously disturbed by the construction of the public ROW including roadways and sidewalks, as well as by the use of the staging yard site by the Section 2 project. As previously discussed, no fossil localities are known to exist specifically within the three-dimensional Project and Project Alternatives sites according to the literature review for the Purple Line Extension Project. However, the Project and Project Alternatives have the potential to impact unknown, buried paleontological resources that may exist within the Older Quaternary alluvium at unknown depths beneath the three-dimensional Project and Project Alternatives sites. Mitigation Measure GEO-B would include paleontological monitoring of ground-disturbing activities during construction, as well as the implementation of a paleontological monitoring plan. With implementation of Mitigation Measure GEO-B, construction impacts related to directly or indirectly destroying unique paleontological resources or geologic features would be less than significant.

Operational Impacts

Once constructed and in operation, the Project and Project Alternatives would not indirectly or directly destroy a unique paleontological resource or site or a unique geological feature, as no ground-disturbing activities would occur during operations. Therefore, operational impacts related to directly or indirectly destroying unique paleontological resources or geologic features would be less than significant.

Impact GEO-7. Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. This work was previously analyzed and approved under a separate environmental review process. No impacts would occur related to the loss of availability of a known mineral resource that would be a value to the region and the residents of the state beyond those previously identified in the Purple Line Extension EIR.

The Project and Project Alternatives

Construction and Operational Impacts

Historically, private companies have produced gas and oil from the East Beverly Hills, San Vicente, and South Salt Lake oil fields. At some oil fields, including those in Beverly Hills, operations are consolidated in centralized oil sites of 1 or 2 acres, called drilling islands. From these islands, many wells can be drilled directionally into a productive oil zone. The number of drilling islands needed to produce an oil zone depends on the depth and lateral extent of the zone. As a result, urban development in some oil fields can coexist with oil production and are examples of urbanized oil fields produced from consolidated, drilling-island sites.

The Project (Beverley Drive) and Project Alternatives RSAs are within the San Vicente oil field; however, there are no active, buried, or plugged wells within any of the RSAs. Therefore, construction and operational impacts related to the loss of availability of a known mineral resource that would be a value to the region and the residents of the state would be less than significant.

Impact GEO-8. 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.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. This work was previously analyzed and approved under a separate environmental review process. No impacts would occur related to 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.

The Project and Project Alternatives

Construction and Operational Impacts

Historically, the City of Beverly Hills has produced gas and oil from the East Beverly Hills, San Vicente, and South Salt Lake oil fields. The San Vicente and Salt Lake oilfields have been the most productive, with the San Vicente field producing over 20 million barrels.

The Project and Project Alternatives lie within the San Vicente oil field. However, there are no active oil wells within any of the RSAs. Title 10, Chapter 5, article 3 of the BHMC addresses the topic of oil wells as they pertain to the City. The purpose of this article is to establish controls for the drilling for and production of oil, gas, and other hydrocarbon substances within and under the City. The provisions of this article prohibit drilling either on the surface or in the subsurface of the City for oil and gas except as strictly permitted. Therefore, because no active oil wells currently exist in the RSAs, there would not be any loss of availability of a mineral resource as designated in the local, specific, or other land use plan. Therefore, construction and operational impacts related to 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 would be less than significant.

3.6.5 Mitigation Measures

To mitigate the potential impacts of subsidence to a less than significant level related to construction of the Project and Project Alternatives, the following mitigation measure shall be implemented:

GEO-A: The City shall include geotechnical exploration as identified in the Purple Line Extension EIS/EIR, and methods such as the use of slurry walls, secant pile walls, and other methods to reduce potential settlement, as required.

To mitigate the potential impact to paleontological resources to a less than significant level related to the construction of the Project and Project Alternatives, the following mitigation measure shall be implemented:

GEO-B: The City shall retain the services of a qualified paleontologist to review project plans and consult with construction staff during pre-construction meetings and as needed throughout the construction process. If subsurface resources are identified by a paleontological monitor during construction, all construction activities in the area of identified paleontological resources shall be temporarily halted so that the qualified paleontologist may document and remove any resources as necessary. At the completion of paleontological monitoring for the project, a paleontological resource monitoring report shall be prepared and submitted to the Natural History Museum of Los Angeles County to document the results of the monitoring activities and summarize the results of any paleontological resources encountered.

Metro developed a Paleontological Resources Monitoring and Mitigation Plan (PRMMP) for the Purple Line Extension Project that specifically addresses the monitoring procedures for the Purple Line in this area. This PRMMP shall be implemented for the North Portal Project, with slight modifications to address local laws and recognize the City of Beverly Hills as lead agency. The City shall implement the modified PRMMP during construction.

The City shall prepare to the level of identification all vertebrate fossils and the significant invertebrate and plant fossils recovered during the monitoring process.

The City shall prepare a report detailing the paleontological resources recovered, their significance, and arrangements made for their curation at the conclusion of the monitoring effort.

The City shall provide the resources necessary to curate the identified and prepared fossils in a manner that meets the standards published by the Society of Vertebrate Paleontology. All significant fossils shall be curated at the Natural History Museum of Los Angeles County.

3.6.6 Impacts after Mitigation

With the implementation of GEO-A, potential subsidence impacts would be mitigated by utilizing geotechnical exploration and, if necessary, slurry walls, secant pile walls, and other methods to minimize potential subsidence. The impact would be less than significant. Any unknown paleontological resources encountered during construction of the Project or Project Alternatives

would be managed by the implementation of Mitigation Measure GEO-B. With implementation of Mitigation Measure GEO-B, and compliance with existing regulations, impacts related to paleontological resources would be reduced to less than significant.

3.6.7 Cumulative Impacts

No Project Alternative

Related projects identified in the project area consist of commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning geology, soils, and mineral resources.

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed, but planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to the human and natural environment were evaluated, and mitigation measures were proposed as applicable in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulatively considerable impact related to geology, soils, or mineral resources beyond any impact identified in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

Construction Impacts

Related projects identified in the project area consist of commercial and residential construction or expansion. Similar to the construction of the Project and the Project Alternatives, construction of the related projects could potentially be subject to ground-shaking within the seismically active southern California region. The Project and associated alternatives, as well as the cumulative projects, would be designed and constructed in accordance with the latest version of the applicable federal, state, and local codes relative to seismic criteria, including the UBC, CBC, and City Policy for Site-Specific Seismic Fault Investigations. The impact to people, buildings, or structures on the Project and Project Alternatives sites from strong seismic ground shaking would be reduced by the required conformance with applicable building codes, and accepted engineering practices. With implementation of GEO-A and comparable mitigation as described in the Purple Line Extension EIS/EIR, impacts due to dewatering-induced subsidence would be less than significant. Construction of the Project and Project Alternatives would not contribute to a cumulatively considerable impact related to subsidence. With compliance with existing regulations, construction of the Project and Project Alternatives would not contribute to a cumulatively considerable impact related to geology, soils, or mineral resources.

Implementation of Mitigation Measure GEO-B would minimize potential impacts to paleontological resources to less than significant. Related projects would also be required to comply with applicable federal, state, and local regulations concerning geology, soils, and mineral resources. Impacts from the Project and Project Alternatives would be localized and minimized. Therefore, construction of the Project and Project Alternatives would not contribute to a cumulatively considerable impact related to paleontological resources.

Operational Impacts

When considered with the related projects, the Project and Project Alternatives are not expected to directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of an earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, and/or landslides. Construction of all projects within the City would adhere to Chapter 16A, Division IV of the CBC, entitled “Earthquake Design,” which states that the “purpose of the earthquake provisions herein is primarily to safeguard against major structural failures or loss of life.” The CBC and UBC regulate the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions.

Once operational, the Project and Project Alternatives, in conjunction with the related projects in the City, would not result in substantial soil erosion or the loss of topsoil. The other proposed residential and commercial projects are located in urban areas that are already developed and paved. There is minimal topsoil that could be affected once the related projects are operational.

The Project and Project Alternatives are not located in a landslide or liquefaction zone. In addition, there are no proposed new oil wells in the City so loss of known mineral resources that would be valuable to the region or delineated in a land use plan would not occur.

Potential impacts to paleontological resources would be minimized through implementation of Mitigation Measure GEO-B. If subsurface resources are identified by the paleontological monitor during construction, all construction activities in the area of identified paleontological resources would be temporarily halted so that the paleontologist may document and remove any resources as necessary. At the completion of paleontological monitoring for the Project and Project Alternatives, a PRMMP would be prepared and submitted to the Natural History Museum of Los Angeles County to document the results of the monitoring activities and summarize the results of any paleontological resources encountered. The Purple Line Extension Project would also implement similar requirements for unknown discovery of paleontological resources.

Post-construction conditions would be similar to existing conditions as the Project and Project Alternatives would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, and/or landslides. The Project and Project Alternatives would not result in substantial soil erosion or the loss of topsoil; be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project; be located on expansive soil, creating substantial direct or indirect risks to life or property; or 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 wastewater. There would not be direct or indirect impacts to a unique paleontological resource or site or unique geologic feature with implementation of Mitigation Measure GEO-B. Lastly, the Project and Project Alternatives would not result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state or 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. Therefore, construction of the Project and Project Alternatives would not contribute to a cumulatively considerable impact related to geology, soils, mineral resources, or paleontological resources.

3.7 Greenhouse Gas Emissions

This section describes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to greenhouse gas (GHG) emissions. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. GHG emissions have the potential to adversely affect the environment because such emissions contribute, on a cumulative basis, to global climate change. This section also provides a background discussion of climate change, a discussion of existing sources of GHG emissions, and a summary of applicable regulations.

Certain gases in the earth's atmosphere, classified as GHGs, play a critical role in determining the earth's surface temperature. A portion of the solar radiation that enters the earth's atmosphere is absorbed by the earth's surface, and a smaller portion of this radiation is reflected back toward space. This infrared radiation (i.e., thermal heat) is absorbed by GHGs within the earth's atmosphere. As a result, infrared radiation released from the earth that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the "greenhouse effect," is responsible for maintaining a habitable climate on the earth.

GHGs are present in the atmosphere naturally, are released by natural and anthropogenic sources, and are formed from secondary reactions taking place in the atmosphere. Natural sources of GHGs include the respiration of humans, animals, and plants; decomposition of organic matter; and evaporation from the oceans. Anthropogenic sources include the combustion of fossil fuels, waste treatment, and agricultural processes. The following are GHGs that are widely accepted as the principal contributors to human-induced global climate change:

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)
- Hydrofluorocarbons (HFCs)
- Perfluorocarbons (PFCs)
- Sulfur hexafluoride (SF₆)
- Nitrogen trifluoride (NF₃)

Emissions of CO₂ are byproducts of fossil fuel combustion. CH₄ is the main component of natural gas and is associated with agricultural practices and landfills. N₂O is a colorless GHG that results from industrial processes, vehicle emissions, and agricultural practices. HFCs are synthetic chemicals used as a substitute for chlorofluorocarbons in automobile air conditioners and refrigerants. PFCs are produced as a byproduct of various industrial processes associated with aluminum production and the manufacturing of semiconductors. SF₆ is an inorganic, odorless, colorless, nontoxic, nonflammable GHG used for insulation in electric power transmission and distribution equipment, and in semiconductor manufacturing. NF₃ is used in the electronics industry during the manufacturing of consumer items, including photovoltaic solar panels and liquid-crystal-display (i.e., LCD) television screens.

Global warming potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to CO₂. The GWP of a GHG is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and length of time (i.e., lifetime) that the gas remains in the atmosphere ("atmospheric lifetime"). The reference gas for GWP is CO₂; therefore, CO₂ has a GWP of 1. The other main GHGs attributed to human

activity include CH₄, which has a GWP of 28, and N₂O, which has a GWP of 265 (USEPA 2017a). For example, 1 ton of CH₄ has the same contribution to the greenhouse effect as approximately 28 tons of CO₂. GHGs with lower emissions rates than CO₂ may still contribute to climate change because they are more effective at absorbing outgoing infrared radiation than CO₂ (i.e., high GWP). The concept of CO₂-equivalents (CO₂e) is used to account for the different GWP potentials of GHGs to absorb infrared radiation.

Although the exact lifetime of any particular GHG molecule is dependent on multiple variables, it is understood by scientists who study atmospheric chemistry that more CO₂ is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. GHG emissions related to human activities have been determined as “extremely likely” to be responsible (indicating 95 percent certainty) for intensifying the greenhouse effect and leading to a trend of unnatural warming of the earth’s atmosphere and oceans, with corresponding effects on global circulation patterns and climate (ARB 2014). The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, no single project is expected to measurably contribute to a noticeable incremental change in the global average temperature, or to a global, local, or micro climate. By their nature, evaluation of GHG emissions under CEQA is a cumulative study.

3.7.1 Regulatory Setting

Federal

USEPA is the federal agency responsible for implementing the federal Clean Air Act (CAA). The Supreme Court of the United States ruled on April 2, 2007, that CO₂ is an air pollutant as defined under the CAA, and that USEPA has the authority to regulate GHG emissions.

Greenhouse Gas Findings under the Federal Clean Air Act

On December 7, 2009, USEPA made two distinct findings regarding GHG emissions under Section 202(a) of the CAA:

- **Endangerment Finding:** The Administrator found that the current and projected concentrations of the six key well-mixed greenhouse gases—CO₂, CH₄, N₂O, HFCs, PFCs, and SF₆—in the atmosphere threaten the public health and welfare of current and future generations.
- **Cause or Contribute Finding:** The Administrator found that the combined emissions of these well-mixed GHGs from new motor vehicles and new motor vehicle engines contribute to the GHG pollution, which threatens public health and welfare.

Although these findings did not themselves impose any requirements on industries or other entities, this action was a prerequisite to finalizing USEPA’s *Rulemaking to Establish Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards* (USEPA 2009).

GHG Emission Standards for Light-Duty and Heavy-Duty Vehicles

On May 7, 2010, the final *Light-Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards* were published in the Federal Register (USEPA 2010). Phase 1 of the emissions standards required vehicles from model years 2012 through 2016 to meet an estimated combined average emissions level of 250 grams of CO₂ per mile,

which is equivalent to 35.5 miles per gallon, if the automobile industry were to meet this CO₂ level solely through fuel economy improvements.

On August 28, 2012, the U.S. Department of Transportation (USDOT) and USEPA issued a joint Final Rulemaking requiring additional federal GHG and fuel economy standards for Phase 2 of the emissions standards for passenger cars and light-duty trucks from model years 2017 through 2025. The standards would require these vehicles to meet an estimated combined average emissions level of 163 grams of CO₂ per mile in model year 2025, which is equivalent to 54.5 miles per gallon, if the improvements were made solely through fuel efficiency. However, on April 2, 2018, USEPA issued a Mid-term Evaluation Final Determination, which finds that the model years 2022 through 2025 emissions standards are not appropriate and should be revised. This Mid-term Evaluation was not a final agency action; rather, this determination led to the making of the Safer Affordable Fuel Efficient Vehicle Rule (USEPA 2018).

In addition to the standards for light-duty vehicles, USDOT and USEPA adopted complementary standards to reduce GHG emissions and improve the fuel efficiency of heavy-duty trucks and buses on September 15, 2011. The Phase 1 standards together form a comprehensive heavy-duty national program for all on-road vehicles rated at a gross vehicle weight at or above 8,500 pounds for model years 2014 through 2018. The standards phased in with increasing stringency in each model year from 2014 through 2018. The USEPA standards adopted for 2018 represented an average per-vehicle reduction in GHG emissions of 17 percent for diesel vehicles and 12 percent for gasoline vehicles (USEPA 2011). Building on the success of the Phase 1 standards, USEPA and the National Highway Traffic Safety Administration finalized Phase 2 standards for medium- and heavy-duty vehicles through model year 2027. The Phase 2 standards are expected to lower CO₂ emissions by approximately 1.1 billion metric tons (MT). On November 16, 2017, USEPA released a proposed rule to repeal the emission standards for heavy-duty glider vehicles, glider engines, and glider kits (USEPA 2017b).

Safer Affordable Fuel Efficient Vehicle Rule

In September 2019, the National Highway Traffic Safety Agency (NHTSA) and USEPA published the Safer Affordable Fuel Efficient (SAFE) Vehicle Rule Part One: One National Program. The SAFE Part One Rule revokes California's authority and vehicle waiver to set its own emissions standards and set zero emission vehicle mandates in California for passenger cars and light trucks and establish new standards, covering model years 2021 through 2026. The SAFE Vehicles Rule Part Two is anticipated to be finalized in 2020.

Mandatory GHG Reporting Rule

On September 22, 2009, USEPA published the Final Mandatory Greenhouse Gas Reporting Rule (Reporting Rule) in the Federal Register. The Reporting Rule requires reporting of GHG data and other relevant information from fossil fuel and industrial GHG suppliers, vehicle and engine manufacturers, and all facilities that would emit 25,000 MT or more of CO₂e per year. Facility owners are required to submit an annual report with detailed calculations of facility GHG emissions on March 31 for emissions from the previous calendar year. The Reporting Rule also mandates recordkeeping and administrative requirements to enable USEPA to verify the annual GHG emissions reports.

State

The California Air Resources Board (ARB) is the agency responsible for coordination and oversight of state and local air pollution control programs in California and for implementing the California Clean Air Act (CCAA).

Assembly Bill 1493

AB 1493, signed in July 2002, requires ARB to develop and implement regulations to reduce automobile and light truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light trucks beginning with model year 2009. In June 2009, the USEPA Administrator granted a CAA waiver of preemption to California. This waiver allowed California to implement its own GHG emissions standards for motor vehicles beginning with model year 2009. California agencies worked with federal agencies to conduct joint rulemaking to reduce GHG emissions for passenger car model years 2017 through 2025. However, as discussed under the federal regulatory setting above, the SAFE Part One revokes California's vehicle waiver and authority to set its own emissions standards. On September 19, 2019, USEPA issued a press release announcing the formal waiver revocation. In response, California and 23 other states and the cities of Los Angeles and New York filed a lawsuit against the NHTSA (ARB 2019a). During the period the federal action is in effect, ARB will administer the affected portions of its program on a voluntary basis.

Executive Order S-3-05

Executive Order S-3-05, signed in June 2005, proclaimed that California is vulnerable to the impacts of climate change. Executive Order S-3-05 declared that increased temperatures could reduce the Sierra Nevada's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the executive order established total GHG emissions targets. Specifically, emissions were to be reduced to 2000 levels by 2010, to 1990 levels by 2020, and to 80 percent below the 1990 levels by 2050. The statewide GHG emissions in 2000 were approximately 466 million metric tons (MMT) CO₂e (ARB 2012). In 2010, overall statewide GHG emissions were approximately 453 MMT CO₂e, exceeding the 2010 goal established by Executive Order S-3-05 (ARB 2012).

Assembly Bill 32

In 2006, California passed the California Global Warming Solutions Act of 2006 (AB 32; California Health and Safety Code Division 25.5, Sections 38500, et seq.). AB 32 further details and puts into law the mid-term GHG reduction target established in Executive Order S-3-05: reduce GHG emissions to 1990 levels by 2020. AB 32 also identifies ARB as the state agency responsible for the design and implementation of emissions limits, regulations, and other measures to meet the target. AB 32 also established several programs to achieve GHG emission reductions, including the Low Carbon Fuel Standard and the Cap-and-Trade program. As of 2017, the state has reduced emissions below the revised AB 32 limit of 427 MMT CO₂e.⁴

Senate Bill 32

In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197. SB 32 establishes a climate pollution reduction target of 40 percent below 1990 levels by

⁴ For more detail, please see <https://ww2.arb.ca.gov/ghg-2020-limit> and <https://ww2.arb.ca.gov/ghg-inventory-graphs>.

2030. AB 197 creates 6-year term limits for ARB members, adds two nonvoting lawmakers to the board and creates a new legislative oversight committee. AB 197 also targets climate change programs to “disadvantaged communities” and requires ARB to consider the social costs of GHG emissions.

ARB Climate Change Scoping Plans

In December 2008, ARB adopted its *Climate Change Scoping Plan. A Framework for Change* (Scoping Plan), which contains the main strategies California will implement to achieve the required GHG reductions required by AB 32 (ARB 2008). The Scoping Plan also includes ARB-recommended GHG reductions for each emissions sector of California’s GHG inventory. ARB further acknowledges that decisions about how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emissions sectors.

ARB is required to update the Scoping Plan at least once every 5 years to evaluate progress and develop future inventories that may guide this process. ARB approved *First Update to the Climate Change Scoping Plan: Building on the Framework* in June 2014 (ARB 2014). The Scoping Plan update includes a status of the 2008 Scoping Plan measures and other federal, state, and local efforts to reduce GHG emissions in California, and potential actions to further reduce GHG emissions by 2020.

In November 2017, ARB released the 2017 Climate Change Scoping Plan, which establishes a framework of action for California to reduce statewide emissions by 40 percent by 2030, compared to 1990 levels (ARB 2017). The 2017 Scoping Plan builds upon the framework established by the 2008 Scoping Plan and the 2014 Scoping Plan Update, while also identifying new, technologically feasible and cost-effective strategies to ensure that California meets its GHG reduction targets.

Executive Order S-1-07

Executive Order S-1-07, which was signed by then California Governor Arnold Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California, at more than 40 percent of statewide emissions. Executive Order S-1-07 establishes a goal that the carbon intensity of transportation fuels sold in California should be reduced by a minimum of 10 percent by 2020. ARB adopted the low carbon fuel standard (LCFS) on April 23, 2009. In November 2015, the Office of Administrative Law approved re-adoption of the LCFS.

Senate Bill 375

SB 375, signed in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or an Alternative Planning Strategy (APS), which will prescribe land use allocation in that MPO’s Regional Transportation Plan (RTP). On September 23, 2010, ARB adopted regional GHG targets for passenger vehicles and light trucks for 2020 and 2035 for the 18 MPOs in California. If MPOs do not meet the GHG reduction targets, transportation projects would not be eligible for funding programmed after January 1, 2012.

SB 375 also extends the minimum time period for the Regional Housing Needs Allocation cycle from 5 years to 8 years for local governments located within a non-attainment MPO that meet certain requirements. City or county land use policies (including general plans) are not required

to be consistent with the RTP (and associated SCS or APS). However, SB 375 creates new provisions to align RTP and Regional Housing Needs Assessment processes to achieve integrated regional land use strategies, and creates new provisions in CEQA that would incentivize qualified projects that are consistent with an approved SCS or APS, categorized as “transit priority projects.”

ARB is required to update the targets for the MPOs every 5 years. In June 2017, ARB released updated targets and technical methodology. The updated targets consider the need to further reduce vehicle miles traveled (VMT), as identified in the 2017 Scoping Plan Update (for SB 32), while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. Like the 2010 targets, the updated SB 375 targets are in units of percent per capita reduction in GHG emissions from automobiles and light trucks relative to 2005; this excludes reductions anticipated from implementation of state technology and fuels strategies, and any potential future state strategies, such as statewide road-user pricing. The proposed targets call for greater per capita GHG emission reductions from SB 375 than are currently in place; which, for 2035, translate into proposed targets that either match or exceed the emission reduction levels contained in the MPOs’ currently adopted SCSs (discussed below) to achieve the SB 375 targets.

For the next round of SCS updates, ARB’s updated targets for the Southern California Association of Governments (SCAG) region are an 8 percent per capita GHG reduction in 2020 from 2005 levels, and a 19 percent per capita GHG reduction in 2035 from 2005 levels (compared to the 2010 target of 13 percent) (ARB 2018). The updated targets and methodology took effect on October 1, 2018, and SCS adopted in 2018 and later would be subject to these new targets (ARB 2018).

Executive Order B-30-15

In April 2015, then Governor Edmund Brown issued an executive order establishing a statewide GHG reduction goal of 40 percent below 1990 levels by 2030. The emission reduction target acts as an interim goal between the AB 32 goal (i.e., achieve 1990 emission levels by 2020) and Governor Brown’s Executive Order S-03-05 goal of reducing statewide emissions 80 percent below 1990 levels by 2050. In addition, the executive order aligns California’s 2030 GHG reduction goal with the European Union’s reduction target (i.e., 40 percent below 1990 levels by 2030) that was adopted in October 2014.

Senate Bill 350

California’s Renewable Portfolio Standard (RPS) was established in 2002 under SB 1078 and accelerated in 2006 under SB 107, by requiring that 20 percent of electricity retail sales be served by renewable energy sources by 2010. Subsequent recommendations in California energy policy reports advocated a goal of 33 percent by 2020, and on November 17, 2008, then Governor Arnold Schwarzenegger signed Executive Order S-14-08 requiring retail sellers of electricity to serve 33 percent of their load with renewable energy by 2020. In April 2011, SB X1-2 codified Executive Order S-14-08, setting the new RPS targets at 20 percent by the end of 2013, 25 percent by the end of 2016, and 33 percent by the end of 2020 for all electricity retailers. In October 2015, then Governor Edmund Brown signed SB 350, which extended the RPS target by requiring retail sellers to procure 50 percent of their electricity from renewable energy resources by 2030. This was followed by SB 100 in 2018, which further increased the RPS target to 60 percent by 2030 along with the requirement that all of the state’s electricity come from carbon-free resources by 2045.

Executive Order B-55-18

On September 10, 2018, then Governor Brown issued Executive Order B-55-18, which establishes a new statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. The Executive Order states that this new goal is in addition to the existing statewide targets of reduction GHG emissions.

Local

ARB also acknowledges that local governments have broad influence and, in some cases, exclusive jurisdiction over activities that contribute to significant direct and indirect GHG emissions through their planning and permitting processes, local ordinances, outreach and education efforts, and municipal operations.

City of Beverly Hills Sustainable City Plan

In February 2009, the City of Beverly Hills released the Sustainable City Plan, which is a toolkit to help address sustainability issues. The Sustainable City Plan does not direct the implementation of any specific actions but provides a list of potential programs and the foundation on which the City can build a unified sustainability strategy. The Sustainable City Plan includes the following policies for reducing and encouraging the reduction of emissions in City operations and Citywide (City of Beverly Hills 2009):

- 2.1: Minimize GHGs and other emissions from City facilities and operations.
- 2.2: Minimize mobile source emissions from on-road and off-road (construction) vehicles.
- 2.3: Minimize stationary source air emissions.
- 2.4: Minimize particulate matter, both airborne photochemical precipitates and windborne dust.

The Sustainable City Plan also includes the following policies for land use, transportation, and open space (City of Beverly Hills 2009):

- 5.1: Implement land use and transportation programs that encourage new buildings, re-use of buildings, infrastructure, parks and open space that improve the quality of life for all who live, work, and play in the City.
- 5.3: Reduce traffic congestion while improving the pedestrian experience on roadways and encourage alternative forms of travel especially to parks.
- Encourage new infrastructure and development that reduces automobile dependence and facilitates walking, bicycling and the use of existing and planned public transit.
- Work with the Metropolitan Transportation Agency and other regional transit authorities to continue to create a multi-modal transportation system that minimizes pollution and reduces motor vehicle congestion while ensuring access and mobility for all.

In January 2020, the City began a Sustainability Workshop Series to discuss circular economics (sustainability and economics), food waste reduction, and water resources.

Los Angeles County Metropolitan Transportation Authority

Greenhouse Gas Emissions Cost Effectiveness Study

In 2010, Metro developed the Greenhouse Gas Emissions Cost Effectiveness Study to evaluate current and potential future sustainability strategies for their costs and impacts on GHG emissions reduction (Metro 2010). The study primarily focuses on discussing the strategies and benefits of improving transit service for the reduction of GHG emissions. As explained in the study, strategies were categorized into four groups: promotion of alternative travel modes; transit service; vehicle technology; and facility energy use.

Climate Action and Adaptation Plan

In 2019, Metro approved the Climate Action and Adaptation Plan (CAAP), which builds on the 2012 CAAP, which created a framework to evaluate and prioritize areas to reduce GHG emissions from operations and presented an approach for responding to the likely impacts of climate change on Metro's system (Metro 2012). In the 2019 CAAP, Metro commits to reducing GHG emissions by 79 percent relative to 2017 levels by 2030 and 100 percent by 2050 (Metro 2019a). Metro identified 13 measures to achieve zero emissions by 2050, which include but are not limited to deploying battery-powered buses and technology, installing systems to store energy captured from trains, buying 100 percent renewable energy, and installing light-emitting diode (LED) lights at facilities and electric heating systems (Metro 2019a).

Energy and Resource Report

In 2019, Metro also released the 2019 Energy and Resource Report, a yearly report that analyzes the sustainability and environmental performance of its operational activities (Metro 2019b). The Energy and Resource Report summarizes Metro's 2018 performance across 10 sustainability indicators, including operational efficiency (unlinked passenger trips, VMT, operating expenses); air quality (criteria pollutant emissions); climate (GHG emissions, GHG displacement); energy use; water use; and waste (total solid waste, diversion from landfill). Since 2017, Metro has reduced its GHG and criteria air pollutant emissions through the transition to renewable natural gas and "near-zero emission" engines. Metro also reduced energy use and increased waste diversion from landfills, even as the system is expanding.

3.7.2 Methodology and CEQA Thresholds

Resource Study Area

The geographic scope of consideration for GHG emissions is on a global scale, as such emissions contribute, on a cumulative basis, to global climate change. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies evaluate the cumulative impacts of GHGs, even relatively small additions, on a global basis. By their nature, GHG evaluations under CEQA are a cumulative study. (See *Center for Biological Diversity v. California Department of Fish and Wildlife* [2015] 62 Cal.4th 204.)

Methodology

Construction

As discussed in Section 3.2, Air Quality, construction-related emissions were estimated using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2 (CAPCOA 2017). CalEEMod allows the user to enter project-specific construction information, such as the construction schedule, the types and number of construction equipment, and the number and length of off-site motor vehicle trips.

Construction of the Project and Cañon Drive-Half Portal Alternative are anticipated to commence within the first quarter 2022 to the first quarter 2024 and would be completed within the third quarter 2025 to the third quarter 2026, depending on the construction contracting mechanism that is decided upon. The analysis for the Project and Cañon Drive-Half Portal Alternative assumed construction would begin in the first quarter of 2022 and last approximately 3 years. Construction of the Cañon Drive Staging Yard Alternative would commence in the first quarter of 2024 and would be completed in the third quarter 2026. Given that exhaust emissions from the construction equipment fleet are expected to decrease over time as stricter standards take effect, and advancements in engine technology, retrofits, and turnover in the equipment fleet occur, construction activities that occur in later years are anticipated to result in lower levels of emissions. It should also be noted that, because the Cañon Drive Staging Yard Alternative would have the same footprint and similar features, the analysis assumed the intensity of construction activities and construction-related emissions would also be similar.

Construction activities would occur within the work hour table shown in the MOA currently in place between the City and Metro, which generally includes, Monday through Friday, 8:00 am through 6:00 pm. Some construction equipment was assumed to operate for 16 hours per day to account for the occasional activities that would require work to be performed after hours, such as piling, decking, excavation, and major concrete pouring activities. Construction assumptions were generally based on construction activities and material import and export quantities for a typical Metro station and scaled based on the footprint for each of the Project and Project Alternatives.⁵ The Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative were assumed to have a maximum of 16, 14, and 11 workers, respectively, per day. Additionally, the analysis assumed the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative would have 12, 10, and 8 haul truck trips per day, respectively. It was assumed there would be approximately 35,705 cubic yards (cy), 31,450 cy, and 24,050 cy of import and export material quantities associated with the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative, respectively. Additional methodology details and assumptions are provided in Appendix C.

Operations

The Project and Project Alternatives are expected to improve pedestrian flow, access, and convenience by providing more than one entrance/exit to the Wilshire/Rodeo Station. One

⁵ For purposes of the emission estimates, the analysis assumed a typical Metro station is 47,600 square feet. Based on preliminary design estimates, the analysis assumed the Project and Cañon Drive-Half Portal Alternative would be approximately 9,200 and 8,100 square feet, respectively. The Cañon Drive Staging Yard Alternative is anticipated to have a footprint of approximately 3,800 square feet. For purposes of the emission estimates, the analysis assumed the Cañon Drive Staging Yard Alternative would have a footprint of 6,200 square feet, which was based on previous preliminary design estimates. As such, the emission estimates presented for the Cañon Drive Staging Yard Alternative are conservative.

beneficial effect of the added portal is to avoid bottlenecks at peak hours. Because the need for the Project is to provide convenient pedestrian access to the northern side of the Wilshire/Rodeo Station, the Project is not anticipated to result in an increase in vehicle trips or VMT. The Project is also anticipated to improve traffic flow, and potentially reduce vehicle idling and the associated fuel consumption, by reducing the number of pedestrian crossings. Therefore, operational activities would be limited to area sources, which include the minor use of maintenance equipment, and energy sources associated with electricity consumption for lighting and operation of elevators and escalators. It is estimated that a typical Metro station consumes approximately 51,290 kilowatt hours (kWh), or 175 million British thermal units (Btu) per year (FTA & Metro 2010). Since the Project would not construct a typical station, but rather a station entrance, this analysis scaled down the energy consumption based on the footprint of the Project and Project Alternatives. The analysis assumed the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative would consume approximately 9,898, 8,719, and 6,667 kWh per year, respectively.

CEQA Thresholds

An impact is considered significant if the project would:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or
2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

As stated in the CEQA Guidelines, these questions are “intended to encourage thoughtful assessment of impacts and do not necessarily represent thresholds of significance” (Title 14, Division 6, Chapter 3 Guidelines for Implementation of CEQA, Appendix G, VII Greenhouse Gas Emissions). The CEQA Guidelines encourage, but do not require lead agencies to adopt thresholds of significance (CEQA Guidelines, § 15064.7). The Guidelines allow lead agencies to develop their own significance threshold and/or to consider thresholds of significance adopted or recommended by other public agencies, or recommended by experts, provided that the thresholds are supported by substantial evidence. Individual lead agencies may also undertake a case-by-case approach for the use of significance thresholds for projects consistent with available guidance and current CEQA practice (OPR 2018).

As the City of Beverly Hills has not established screening thresholds for GHG emissions, the analysis uses the applicable significance thresholds developed by the SCAQMD. The SCAQMD has adopted a significance threshold of 10,000 MT of CO₂e per year for industrial (stationary source) projects. The GHG CEQA Significance Threshold Stakeholder Working Group also recommended options for evaluating non-industrial projects, including thresholds for residential and commercial projects. These draft thresholds include a threshold of 3,000 MT CO₂e per year for residential and commercial projects (SCAQMD 2008). The Project and Project Alternatives fall closest under a category of an industrial-type project (i.e., it doesn’t include residential and commercial land uses).

The 10,000 MT CO₂e threshold was developed in 2008 and was intended to ensure at least 90 percent of new GHG emissions would be reviewed and assessed for mitigation, thereby contributing to GHG emissions reduction goals of AB 32. However, the Project and Project Alternatives would begin construction in 2022 or 2024; thus, construction-related and operational GHG emissions should also be analyzed in the SB 32 statewide framework (which

established a 2030 GHG emissions reduction target of 40 percent below 1990 levels). However, the SCAQMD has not adopted a threshold of significance consistent with SB 32 goals. To provide this additional information to put the project-generated GHG emissions in the appropriate statewide context, this analysis presumes that a 40 percent reduction in the SCAQMD's existing threshold (resulting in 6,000 MT CO₂e) is necessary to achieve the State of California's 2030 GHG reduction goal (which is a 40 percent reduction below 1990 GHG emissions levels). This analysis also reviewed guidelines used by other public agencies. For example, the Sacramento Metropolitan Air Quality Management District (SMAQMD) has identified an annual threshold of 1,100 MT CO₂e for the construction and operational phases of projects⁶ (SMAQMD 2018). Although the SMAQMD recognizes that, although there is no known level of emissions that determines if a single project will substantially impact overall GHG emission levels in the atmosphere, a threshold must be set to trigger a review and assessment of the need to mitigate project GHG emissions. The threshold set by the SMAQMD was developed considering the AB 32 and SB 32 reduction goals. Therefore, this analysis utilizes the 1,100 MT CO₂e threshold developed by the SMAQMD for the construction and operational phase of all project types for conservative purposes.

To summarize, the CO₂e thresholds to be used for this evaluation are:

- 1,100 MT CO₂e (SMAQMD conservative threshold)
- 6,000 MT CO₂e (Adjusted SCAQMD threshold after SB 32)
- 10,000 MT CO₂e (SCAQMD adopted threshold before SB 32)

It is not the intent of this CEQA document to cause the adoption of these thresholds as mass emissions limits for this or other projects, but rather to provide this additional information to put the project-generated GHG emissions in the appropriate statewide context.

3.7.3 Existing Conditions

GHG emissions contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, electric utility, residential, commercial, and agricultural categories.

ARB performs an annual GHG inventory for emissions and sinks of the six major GHGs. California produced 424.1 MMT CO₂e in 2017 (ARB 2019b). As shown on Figure 3.7-1, combustion of fossil fuel in the transportation category was the single largest source of California's GHG emissions in 2017 followed by the industrial and electric power (including in-state and out-of-state sources) categories (ARB 2019b).

⁶ The SMAQMD developed an annual threshold of 1,100 MT CO₂e for the construction phase of all project types, an annual threshold of 1,100 MT CO₂e for the operational phase of land development projects, and an annual threshold of 10,000 MT CO₂e for stationary source operational emissions (SMAQMD 2018).

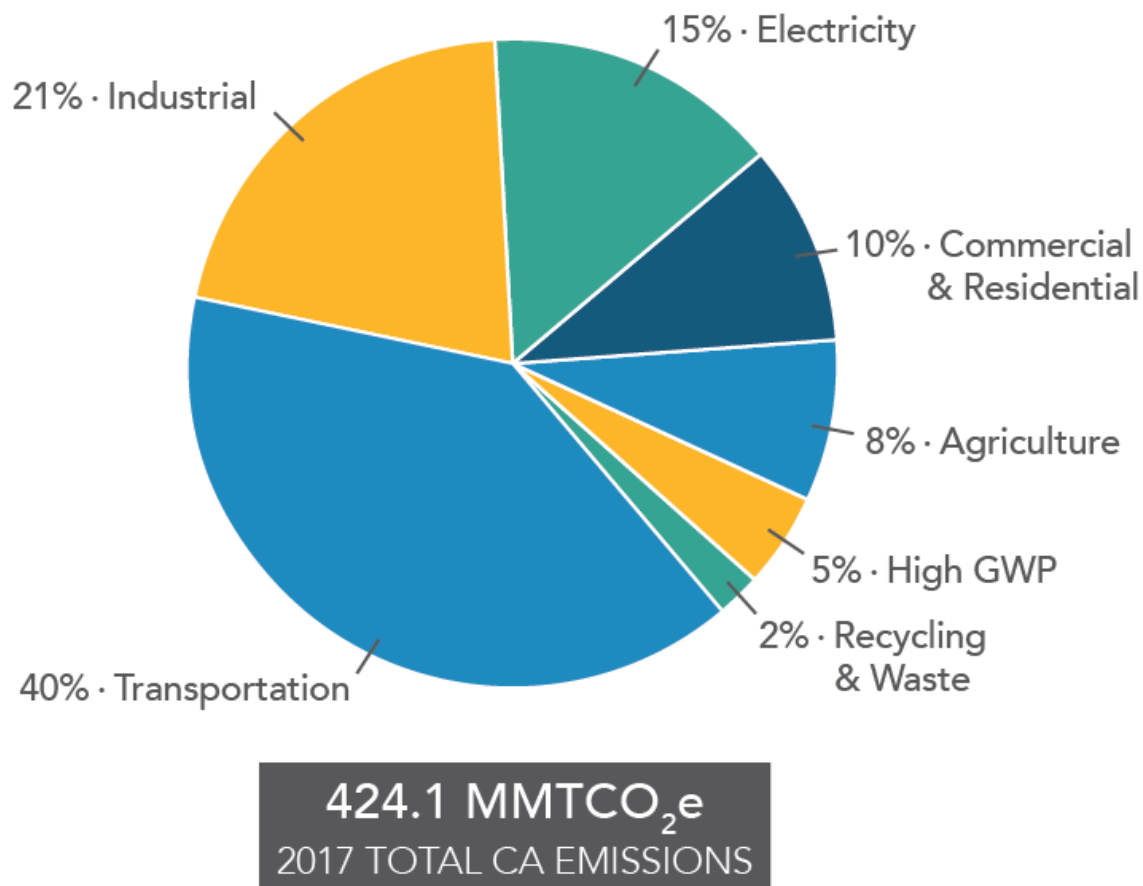


Figure 3.7-1 California 2017 GHG Inventory

3.7.4 Impact Evaluation

Impact GHG-1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to GHG emissions were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not generate GHG emissions. Therefore, no impacts would occur related to the generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

The Project (Beverly Drive)**Construction Impacts**

Heavy-duty off-road equipment, materials transport, and worker commutes during construction of the Project would result in exhaust-related GHG emissions. Table 3.7-1 summarizes the Project's construction-related GHG emissions during each year of construction.

Table 3.7-1 Project Construction-Related GHG Emissions

Year	GHG Emissions (MT CO₂e)
2022	344
2023	513
2024	789
2025	4
<i>SMAQMD Threshold ¹</i>	<i>1,100</i>
<i>Adjusted SCAQMD Threshold ²</i>	<i>6,000</i>
<i>SCAQMD Adopted Threshold ³</i>	<i>10,000</i>
Exceeds Thresholds?	No
Notes: Modeled by AECOM in 2020. MT CO ₂ e = metric tons carbon dioxide equivalents ¹ SMAQMD 2018 ² The adjusted SCAQMD threshold of 6,000 MT CO ₂ e was developed presuming that a 40 percent reduction in the SCAQMD's existing threshold of 10,000 MT is necessary to achieve the State's 2030 GHG reduction goal (which is a 40 percent reduction below 1990 GHG emissions levels). ³ SCAQMD 2008	

As shown in Table 3.7-1, construction of the Project would not exceed SCAQMD's adopted significance threshold of 10,000 MT CO₂e per year, the adjusted SB 32 threshold of 6,000 MT CO₂e per year, nor the annual SMAQMD threshold of 1,100 MT CO₂e. In addition, GHG emissions during construction would be further reduced with implementation of mitigation measures. Mitigation Measures AIR-A through AIR-C, included in Section 3.2, Air Quality, would require the contractor to limit unnecessary idling, and to maintain and tune engines per manufacturer's specifications. With implementation of mitigation measures, construction impacts related to the generation GHG emissions, either directly or indirectly, that may have a significant impact on the environment would be less than significant.

Cañon Drive-Half Portal Alternative**Construction Impacts**

Similar to the Project, heavy-duty off-road equipment, materials transport, and worker commutes during construction of the Cañon Drive-Half Portal Alternative would result in exhaust-related GHG emissions. Table 3.7-2 summarizes the construction-related GHG emissions associated with the Cañon Drive-Half Portal Alternative during each year of construction.

**Table 3.7-2 Cañon Drive-Half Portal Alternative
Construction-Related GHG Emissions**

Year	GHG Emissions (MT CO ₂ e)
2022	340
2023	471
2024	758
2025	4
<i>SMAQMD Threshold</i> ¹	1,100
<i>Adjusted SCAQMD Threshold</i> ²	6,000
<i>SCAQMD Adopted Threshold</i> ³	10,000
Exceeds Thresholds?	No
Notes: Modeled by AECOM in 2020. MT CO ₂ e = metric tons carbon dioxide equivalents ¹ SMAQMD 2018 ² The adjusted SCAQMD threshold of 6,000 MT CO ₂ e was developed presuming that a 40 percent reduction in the SCAQMD's existing threshold of 10,000 MT is necessary to achieve the State's 2030 GHG reduction goal (which is a 40 percent reduction below 1990 GHG emissions levels). ³ SCAQMD 2008	

As shown in Table 3.7-2, construction of the Cañon Drive-Half Portal Alternative would not exceed SCAQMD's adopted significance threshold of 10,000 MT CO₂e per year, the adjusted SB 32 threshold of 6,000 MT CO₂e per year, nor the annual SMAQMD threshold of 1,100 MT CO₂e. In addition, GHG emissions during construction would be further reduced with implementation of mitigation measures. Mitigation Measures AIR-A through AIR-C, included in Section 3.2, Air Quality, would require the contractor to limit unnecessary idling, and to maintain and tune engines per manufacturer's specifications. With implementation of mitigation measures, construction impacts related to the generation GHG emissions, either directly or indirectly, that may have a significant impact on the environment would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

Similar to the Project and Cañon Drive-Half Portal Alternative, heavy-duty off-road equipment, materials transport, and worker commutes during construction of the Cañon Drive Staging Yard Alternative would result in exhaust-related GHG emissions. Table 3.7-3 summarizes the construction-related GHG emissions associated with the Cañon Drive Staging Yard Alternative during each year of construction.

As shown in Table 3.7-3, construction of the Cañon Drive Staging Yard Alternative would not exceed SCAQMD's adopted significance threshold of 10,000 MT CO₂e per year, the adjusted SB 32 threshold of 6,000 MT CO₂e per year, or the annual SMAQMD threshold of 1,100 MT CO₂e. In addition, GHG emissions during construction would be further reduced with implementation of mitigation measures

Mitigation Measures AIR-A through AIR-C, included in Section 3.2, Air Quality, would require the contractor to limit unnecessary idling, and to maintain and tune engines per manufacturer's

specifications. With implementation of mitigation measures, construction impacts related to the generation GHG emissions, either directly or indirectly, that may have a significant impact on the environment would be less than significant.

**Table 3.7-3 Cañon Drive Staging Yard Alternative
Construction Related GHG Emissions**

Year	GHG Emissions (MT CO ₂ e)
2024	337
2025	417
2026	710
2027	11
<i>SMAQMD Threshold</i> ¹	1,100
<i>Adjusted SCAQMD Threshold</i> ²	6,000
<i>SCAQMD Adopted Threshold</i> ³	10,000
Exceeds Thresholds?	No
Notes: Modeled by AECOM in 2020. MT CO ₂ e = metric tons carbon dioxide equivalents ¹ SMAQMD 2018 ² The adjusted SCAQMD threshold of 6,000 MT CO ₂ e was developed presuming that a 40 percent reduction in the SCAQMD's existing threshold of 10,000 MT is necessary to achieve the State's 2030 GHG reduction goal (which is a 40 percent reduction below 1990 GHG emissions levels). ³ SCAQMD 2008	

The Project and Project Alternatives

Operational Impacts

During operations, the Project and Project Alternatives would generate emissions associated with area sources, such as minor landscape and maintenance activities and energy sources. Energy source emissions would result in indirect GHG emissions associated with electricity consumption for lighting and for escalator and elevator use. The Project and Project Alternatives are not anticipated to result in an increase in vehicle trips or VMT. On the contrary, implementation of the Project and Project Alternatives is anticipated to reduce VMT in the region by encouraging people to take public transit. However, this analysis conservatively does not account for emissions reduction associated with the avoided VMT. presents the operational emissions associated with the Project and Project Alternatives.

Table 3.7-4, operation of the Project and Project Alternatives would not generate GHG emissions that exceed the established thresholds. Therefore, operational impacts related to the generation GHG emissions, either directly or indirectly, that may have a significant impact on the environment would be less than significant.

Table 3.7-4 Project and Project Alternatives Operational Emissions

Project/Alternative	Annual GHG Emissions (MT CO₂e/year)
Project	3.17
Cañon Drive-Half Portal Alternative	2.79
Cañon Drive Staging Yard Alternative	2.13
<i>SMAQMD Threshold</i>	<i>1,100</i>
<i>Adjusted SCAQMD Threshold</i>	<i>6,000</i>
<i>SCAQMD Adopted Threshold</i>	<i>10,000</i>
Exceeds Thresholds?	No
Notes: Modeled by AECOM in 2020. MT CO ₂ e/year = metric tons carbon dioxide equivalents per year	

As shown in Table 3.7-1, Table 3.7-2, Table 3.7-3, and Impact GHG-2. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to GHG emissions were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would have no impacts related to conflict with plans, policies, or regulations adopted for the purpose of reducing GHG emissions.

The Project and Project Alternatives

Construction and Operational Impacts

As discussed in Section 3.7.1, in response to AB 32 and SB 32, ARB has approved a series of Climate Change Scoping Plans and Scoping Plan updates. While the Scoping Plan updates do include measures that would indirectly address GHG emissions associated with construction and operational activities, including the phasing in of cleaner technology for diesel engine fleets (including construction equipment) and LCFS, successful implementation of these measures predominantly depends on the development of laws and policies at the state level. Thus, it is assumed that any requirements or policies formulated under the mandate of AB 32 and SB 32 that would be applicable to the project, either directly or indirectly, would be implemented consistent with statewide policies and laws.

In 2007, Metro adopted a Construction and Demolition Debris Recycling and Reuse Policy that could result in reduced GHG emissions by giving preference to recyclable and recycled products in the selection of construction materials and ensure that facilities used for disposal and recycling are complying with the applicable federal, state, or local rules and regulations

(Metro 2007). All Metro contractors are required to implement this policy to the greatest extent possible.

The Project and Project Alternatives would also be required to implement measures and equipment standards as indicated in the Construction and Demolition Debris Recycling and Reuse Policy and the MOA with the City of Beverly Hills.

As discussed in Section 3.7.1, the City of Beverly Hills and Metro have developed and approved several plans that address GHG emissions. In the 2009 City of Beverly Hills Sustainable City Plan, the City identified key objectives and policies to address sustainability issues, which included minimizing mobile source emissions from on-road vehicles and reducing traffic congestion while improving the pedestrian experience on roadways and encouraging alternative forms of travel (City of Beverly Hills 2009). The 2010 Metro GHG Emissions Cost Effectiveness Study also calls for the promotion of alternative travel modes and improvements to transit service. The 2019 Metro Climate Action and Adaptation Plan recognizes that transportation remains California's largest source of GHG emissions, and thus, by reducing VMT, transit agencies play a unique role in helping to reduce emissions from the transportation sector (Metro 2019a). As described in the Climate Action and Adaptation Plan, Metro also has a responsibility to reduce GHG emissions by increasing ridership as a means to slow future impacts of climate change.

Similarly, the 2017 ARB Climate Change Scoping Plan includes GHG reduction strategies and actions in six key sectors: low carbon energy, industry, transportation sustainability, natural and working lands, waste management, and water (ARB 2017). Within the transportation sustainability sector, ARB calls for encouraging public transit use and increasing public transportation opportunities by supporting walkable and transit-accessible communities in efforts to reduce GHG emissions from light-duty combustion vehicles (ARB 2017). Additionally, SCAG 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) is a plan that integrates land use and transportation in efforts for the region to grow sustainably. The strategies for improving air quality and reducing GHG emissions include providing neighborhoods with efficient and plentiful public transit, and abundant and safe opportunities to walk (SCAG 2016).

The Project and Project Alternatives would provide an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard, thereby delivering improved, convenient, and safe public access to the Beverly Hills Business Triangle. The Project and Project Alternatives are expected to improve pedestrian flow by providing more than one entrance/exit to avoid bottlenecks at peak hours. Because the need for the Project is to provide convenient pedestrian access to the northern side of the Wilshire/Rodeo Station, the Project and Project Alternatives are not anticipated to result in an increase in vehicle trips or VMT. As a result, the Project and Project Alternatives would promote the use of transit and enhance the pedestrian network and thereby potentially reducing GHG emissions by reducing the amount of vehicle miles traveled, and the number of cars that operate in congested traffic conditions (Metro 2010). Thus, the Project and Project Alternatives would be consistent with the goals of the 2019 CAAP, City of Beverly Hills Sustainable City Plan, 2017 ARB Climate Change Scoping Plan, and SCAG RTP/SCS, as they would promote an increase in ridership and reduce the use of motor vehicles.

As shown in Table 3.7-1, Table 3.7-2, Table 3.7-3, and Table 3.7-4, and as an indication of the Project's and Project Alternatives' consistency with State legislative framework, the Project and Project Alternatives would not generate a significant amount of GHG emissions during construction or operations. Therefore, the Project and Project Alternatives would be consistent

with established federal, state, and local plans adopted for the purpose of reducing GHG emissions. In addition, GHG emissions during construction would also be reduced with implementation of mitigation measures in the MOA between Metro and the City of Beverly Hills. Mitigation Measures AIR-A through AIR-C, included in Section 3.2, Air Quality, would require the contractor to limit unnecessary idling, and maintain and tune engines per manufacturer's specifications. With implementation of mitigation measures the Project and Project Alternatives would not conflict with any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. Therefore, construction and operational impacts would be less than significant.

3.7.5 Mitigation Measures

Impacts related to GHG emissions are less than significant. As such, mitigation measures are not required to reduce significant impacts. However, as described in the MOA between Metro and the City of Beverly Hills, the contractor would be required to implement the following mitigation measures to even further reduce emissions as feasible. As previously mentioned, these mitigation measures are originally included in Section 3.2, Air Quality.

Project and Project Alternatives

- AIR-A:** Construction contractors shall be required to not unnecessarily idle heavy equipment.
- AIR-B:** Construction contractors shall maintain and tune engines per manufacturer's specifications to perform at EPA certification where applicable, and to perform at verified standards applicable to retrofit technologies. Construction contractors shall also be subject to periodic, unscheduled inspections to limit unnecessary idling and to ensure that construction equipment is properly maintained, tuned, and modified consistent with established specifications.
- AIR-C:** Construction contractors shall lease new, clean equipment meeting the most stringent of applicable federal or state standards (e.g., Tier 3 or greater engine standards) or best available emissions control technologies on all equipment.

3.7.6 Impacts after Mitigation

Implementation of Mitigation Measures AIR-A through AIR-C would further reduce construction GHG emissions below the threshold. With implementation of mitigation, construction GHG emissions impacts would be less than significant.

3.7.7 Cumulative Impacts

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to GHG emissions were evaluated, and mitigation measures proposed as applicable, in Metro's previous

separate environmental review process. The No Project Alternative would have no cumulatively considerable impacts related to GHG emissions.

The Project and Project Alternatives

The geographic scope of consideration for GHG emissions is on a global scale, because such emissions contribute, on a cumulative basis, to global climate change. Given the nature of environmental consequences from GHGs and global climate change, CEQA requires that lead agencies evaluate the cumulative impacts of GHGs, even relatively small additions, on a global basis. By their nature, GHG evaluations under CEQA are a cumulative study. (See *Center for Biological Diversity v. California Department of Fish and Wildlife* (2015) 62 Cal.4th 204). The GHG emissions impact analysis above constitutes a cumulative analysis, in that it considers global, statewide, and regional projections of GHG emissions, as well as the contribution of the project, to GHG emission impacts. Therefore, the significance conclusions reached above with regard to Impacts GHG-1 and GHG-2 also constitute this EIR's significance conclusions with regard to cumulative GHG emissions impacts. Therefore, construction or operational impacts related to GHG emissions would not be cumulatively considerable.

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3.8 Hazards and Hazardous Materials

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to hazards and hazardous materials. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. The section describes the affected environment and analyzes the environmental consequences of the Project and Project Alternatives and, if applicable, provides mitigation measures.

3.8.1 Regulatory Setting

Federal

Comprehensive Environmental Response, Compensation, and Liability Act of 1980

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) of 1980, otherwise known as the “Superfund Act,” provides a federal fund to identify, characterize, and remediate hazardous material sites. Through the Superfund Act, the U.S. Environmental Protection Agency (USEPA) was granted the authority to identify and obtain the cooperation of parties responsible for hazardous material incidents and conditions.

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act (RCRA) gives USEPA authority to control the generation, transportation, treatment, storage, and disposal of hazardous waste. The main objectives are to protect human health and the environment from the potential hazards of waste disposal, to conserve energy and natural resources, to reduce the amount of waste generated, and to ensure that wastes are managed in an environmentally sound manner. Regulated entities that generate hazardous waste are subject to waste accumulation, manifesting, and recordkeeping standards. Compliance monitoring is delegated to states and local authorities. The California Department of Toxic Substances Control (DTSC) has been delegated by USEPA to implement and enforce the RCRA requirements in California.

Hazardous Materials Transportation Act of 1975

The Hazardous Materials Transportation Act, administered by the U.S. Department of Transportation (USDOT), regulates the transport of hazardous materials by motor vehicles, marine vessels, and aircraft.

American Society of Testing and Materials International (ASTM) E-1527-05

American Society of Testing and Materials International E-1527-05 is not a federal regulation but a professional society standard for hazardous material site assessment that has become the national standard. It is recognized by USEPA as a means to assess and indicate a site’s hazardous material conditions.

State

California Hazardous Waste Control Act

The Hazardous Waste Control Act is similar to RCRA and regulates the identification, generation, transportation, storage, and disposal of materials and wastes deemed hazardous by the State of California.

California Health and Safety Code

Sections 25316 and 25317 of the California Health and Safety Code identify hazardous material, substances, and wastes that require removal, including petroleum and petroleum byproducts.

California Department of Toxic Substances Control

The Hazardous Waste and Substances Sites (Cortese) List is a planning document used by the State of California, local agencies, and developers to comply with CEQA requirements in providing information about the location of hazardous materials release sites. Government Code Section 65962.5 requires the California Environmental Protection Agency to develop, at least annually, an updated Cortese List. The DTSC is responsible for a portion of the information contained in the Cortese List. Other state and local government agencies are required to provide additional hazardous material release information for the Cortese List.

Local

City of Beverly Hills General Plan –Safety Element and Hazard Mitigation Plan

The City of Beverly Hills General Plan, amended on January 12, 2010, provides a comprehensive framework that guides the City's development through 2025. The Safety Element guides public health and safety, and addresses fire, flood, geologic, and seismic hazards, hazardous materials, and disaster preparedness. The following goals and policies from the Safety Element are applicable to hazards and hazardous materials.

Goal S 6: Protection from Hazardous Materials: To ensure that the health, safety and general welfare of residents, visitors and the overall natural environment is protected to the maximum extent feasible from harmful exposure to hazardous materials

S 6.1 Inter-jurisdictional Coordination. Continue to coordinate with and support the Los Angeles County Certified Unified Program Agency (CUPA), the Los Angeles County Fire Department, and their Health & Hazardous Materials Division (HHMD) in carrying out inspections, emergency response, enforcement, and site mitigation oversight of hazardous materials and waste. (Imp. 7.1)

S 6.4 Hazardous Materials Regulation. Enforce current laws requiring all users, producers, and transporters of hazardous materials and waste to clearly identify the materials that they store, use, produce, or transport, and to notify the appropriate City, county, State, and federal agencies in the event of a violation. (Imp. 7.1, 7.2)

S 6.5 Known Areas of Contamination. Require proponents of projects in known areas of contamination from oil operations or other uses to perform comprehensive soil and groundwater contamination assessments at their expense, in accordance with American

Society for Testing and Materials standards, and if contamination exceeds regulatory action levels require the proponent to undertake remediation procedures prior to grading and development under the supervision of the Los Angeles County Environmental Health Division, County Department of Toxic Substances Control, or Regional Water Quality Control Board (depending upon the nature of the identified contamination). (Imp. 7.1, 7.2)

The Hazard Mitigation Action Plan was added to the Safety Element in 2011 in response to the Disaster Mitigation Act 2000, which required state and local governments to develop hazard mitigation plans and update them every 5 years. The purpose of the Hazard Mitigation Plan is to respond to the many potential hazards that could affect the City of Beverly Hills. The plan was subsequently updated in 2017. According to the original and updated plans, the probability of a hazardous materials incident occurring in the City is low, and as such, the plan does not address this type of disaster. The City anticipates the next update of the hazard mitigation plan to include discussion of construction for the Metro Purple Line Extension.

The Project and Project Alternative sites are not located in a very high fire hazard severity zone (California Department of Forestry and Fire Protection [CAL FIRE] 2011). As such, goals and policies from the Safety Element related to wildland fires are not applicable. Goals and policies related to fire protection service are discussed in Section 3.11 (Public Services).

Beverly Hills Municipal Code

Chapter 6 of Title 5 (Public Health, Welfare, and Sanitation) of the Beverly Hills Municipal Code (BHMC) addresses miscellaneous restrictions and prohibitions, including disposal of solid waste. Article 12 (Disposal of Solid Waste) prohibits scavenging through solid waste containers, illegal dumping, and burying solid waste. Title 9 (Building and Property Health and Safety Regulations) of the BHMC includes regulations that govern stormwater and urban runoff and prohibits discharges of hazardous substances or materials into the sewer system. The Project and Project Alternatives would be subject to the BHMC as applicable.

3.8.2 Methodology and CEQA Thresholds

Resource Study Area

The resource study area (RSA) for hazardous materials is defined as the project footprint (i.e., the area needed to construct, operate, and maintain all permanent project features) for each of the Project and Project Alternatives plus a quarter-mile buffer. The RSAs for the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative are shown on **Figure 3.8-1** (Hazardous Materials RSA boundaries for the Project and Project Alternatives). The combined RSA refers to the combined total area occupied by the three RSAs.

Methodology

Hazardous substances are defined by state and federal regulations as substances that must be regulated in order to protect the public health and the environment. Hazardous materials have certain chemical, physical, or infectious properties that cause them to be hazardous. The California Code of Regulations (CCR) Title 22, Division 4.5, Chapter 11, Article 2, Section 66261.10 identifies the characteristics of hazardous waste. Based on the CCR criteria, this section defines hazardous waste as the following:

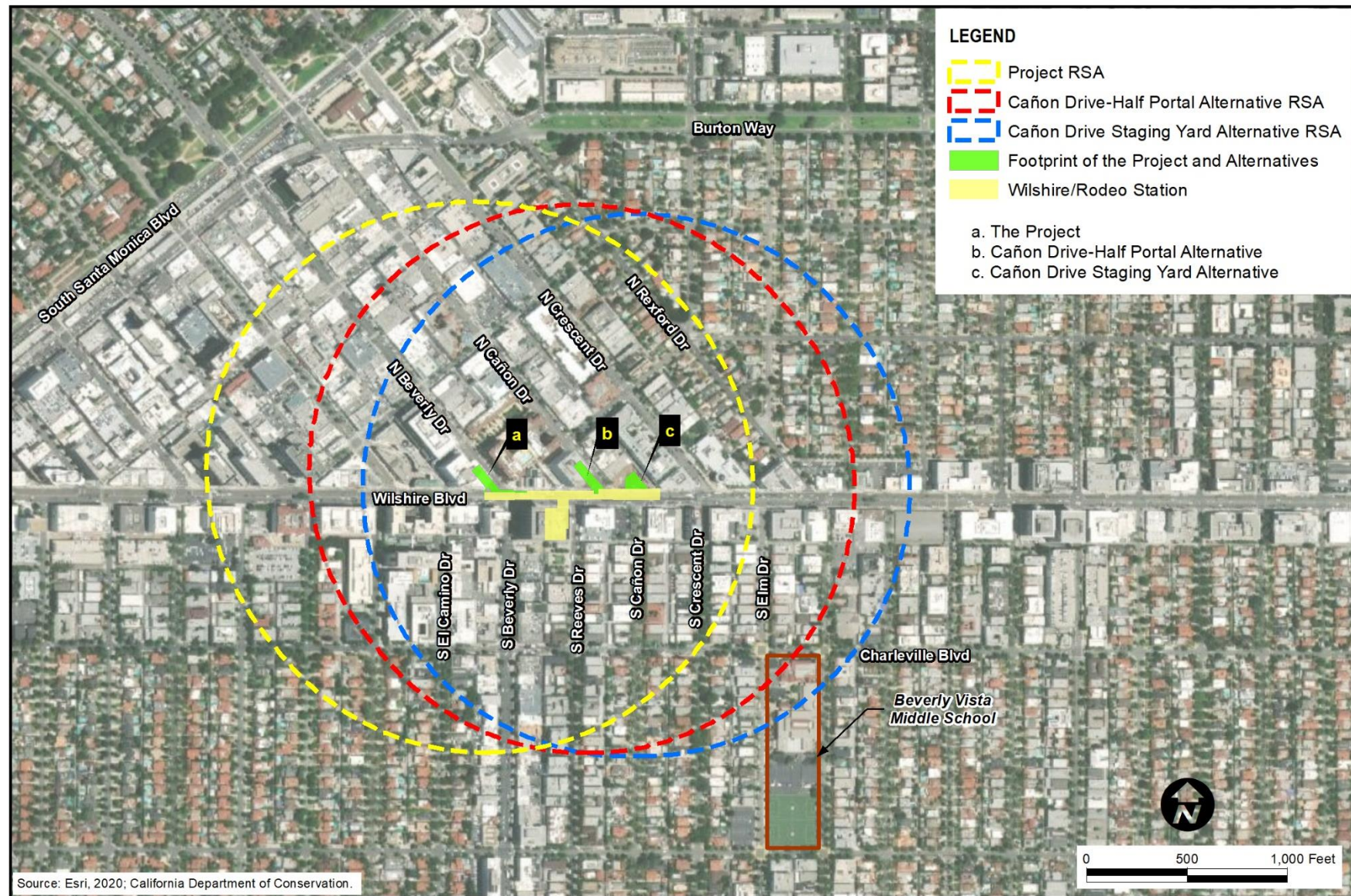


Figure 3.8-1 Hazardous Materials RSA boundaries for the Project and Alternatives

A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical, or infectious characteristics, may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness; or (2) pose a substantial present or potential hazard to human health or environment when improperly treated, stored, transported, or disposed of or otherwise managed.

According to Title 22 (CCR Chapter 11, Article 3), substances having a characteristic of toxicity, ignitability, corrosivity, or reactivity are considered hazardous. Hazardous wastes are hazardous substances that no longer have a practical use, such as material that has been abandoned, discarded, spilled, or contaminated, or which is being stored prior to disposal. Household hazardous waste generated by commercial and residential uses are excluded from the definition of hazardous waste under Title 40 of the Code of Federal Regulations Part 261.4, and are not included as part of this analysis as the Project and Project Alternatives do not include commercial and residential uses.

Toxic substances may cause short-term or long-term health effects, ranging from temporary effects to permanent disability or death. Examples of toxic substances include most heavy metals, pesticides, benzene, gasoline, hexane, natural gas, sulfuric acid, lye, explosives, pressurized canisters, and radioactive and biohazardous materials. Soils may also be toxic because of accidental spilling of toxic substances.

The following impact analysis is based on a review of publicly available information, including the City of Beverly Hills General Plan, associated technical background reports, BHMC, Metro Westside Subway Extension technical reports, and CAL FIRE Fire Hazard Severity maps. Google Earth was used to identify schools and airports within the combined RSA. School locations were confirmed through a review of the Beverly Hills Unified School District (BHUSD) website. The DTSC EnviroStor and State Water Resources Control Board (SWRCB) GeoTracker databases were used to identify hazardous materials sites within the combined RSA.

The analysis of hazardous materials consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the Project and Project Alternative sites, anticipated impacts, and mitigation measures and level of significance after mitigation, if applicable. Project activities were assessed to determine their potential impact on creating hazardous conditions to the public or the environment during construction and operation. Potential impacts were then analyzed against applicable significance criteria (as described below). Where a potentially significant impact would be anticipated, proposed mitigation measures to address these potential effects were developed.

CEQA Thresholds

An impact is considered significant if the project would:

1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials;
2. 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;

3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances,⁷ or waste within one-quarter mile of an existing or proposed school;
4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment;
5. 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, result in a safety hazard or excessive noise for people residing or working in the project area;
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

3.8.3 Existing Conditions

The RSA is characterized as highly urbanized and densely developed, with primarily commercial and residential uses and minimal empty parcels. Buildings north of Wilshire Boulevard are typically larger and densely packed commercial, retail, residential, and mixed-use premises. Buildings south of Wilshire Boulevard mostly comprise single-family residences and small multi-family apartment buildings.

Use, Disposal, Storage, and Transport of Hazardous Materials

Spills or releases of hazardous materials can result from both stationary and mobile sources. According to the City's Local Hazard Mitigation Action Plan 2017-2022, prepared by the Office of Emergency Management, Resilience and Recovery, the level of exposure from stationary sources in the City is considered very low due to the types of business and industry conducted within the City. The one location where significant amounts of hazardous material have been identified is at the City-owned Water Treatment Plant, where a large quantity of ammonium hydroxide that is commonly used in industrial applications is used to treat water. The City Water Treatment Plant is at 345 Foothill Road, approximately 0.45 miles north of the Project and Project Alternatives sites.

The risk of exposure to hazardous materials within the City from mobile sources is slightly higher than from stationary sources due to the heavily used thoroughfares within the City, such as North Santa Monica Boulevard and Wilshire Boulevard. In general, with the exception of high-level radioactive materials and certain poisons and explosives, all classes of hazardous materials can be transported on roadways in the City. Section 31303 of the California Vehicle Code and USDOT regulations require that hazardous materials be transported by routes, specifically, state or interstate highways, with the least overall travel time whenever practicable and, therefore, many of the local streets in the City are not used for the transport of hazardous materials (City of Beverly Hills 2013). Wilshire Boulevard is not a state or interstate highway. Therefore, the probability of spills or releases of hazardous materials within the City is

⁷ Acutely hazardous materials, substances, and waste are wastes that contain dangerous chemicals that could pose a threat to human health and the environment even when properly managed. Acute hazardous waste is subject to stricter management standards than most other wastes.

considered low (City of Beverly Hills 2019b). According to the Local Hazard Mitigation Action Plan 2017-2022, there is no record of a hazardous material spill or incident in the City (City of Beverly Hills 2019b).

The Project and Cañon Drive-Half Portal Alternative sites are located within existing ROW (ROW). Existing sources of potentially hazardous materials come from mobile sources (i.e., automobiles along Wilshire Boulevard, Beverly Drive, and Cañon Drive) and include fuels and oils, which are regulated. The Cañon Drive Staging Yard Alternative site is located within an area that has been previously acquisitioned for repurposing as a staging yard for the Section 2 project. Existing activities associated with the staging yard are temporary and consist of construction staging, which could include the use of potentially hazardous materials, such as fuels, oils, and cleaning solvents, which are all regulated.

Regulatory Database Search

The DTSC EnviroStor and SWRCB Geotracker databases were reviewed to identify known hazardous materials sites in the area. Both are used to track and record data from land disposal sites and unauthorized releases of hazardous materials from underground storage tanks (USTs). The EnviroStor database also includes those sites listed on the Cortese List and the USEPA National Priorities List, pursuant to Government Code § 65962.5. None of the nine sites listed on the Cortese List within the City of Beverly Hills are within the combined RSA (DTSC 2019a). Additionally, no Superfund sites identified on the National Priorities List are in the City of Beverly Hills (USEPA 2020).

According to the database research, no hazardous materials sites on the Cortese List are located within the footprints for the Project or Project Alternatives sites. However, the SWRCB Geotracker database shows one active permitted UST is within the combined RSA at the Beverly Wilshire Hotel, at 9500 Wilshire Boulevard, approximately 290 feet west of the Project site. Additionally, seven leaking USTs (LUSTs) are within the combined RSA, which consist primarily of fuel-contaminated sites that are regulated pursuant to Title 23 of the CCR, Chapter 16, Article 11. All seven LUST sites identified within the combined RSA are considered completed cleanup sites and no unauthorized leaks or spills are currently identified. The name, address, type, and status of the hazardous materials sites within the combined RSA are listed in Table 3.8-1 (DTSC 2019b; SWRCB 2015). Figure 3.8-2 shows the hazardous materials sites located within the combined RSA.

Emergency Evacuation and Response Plans

As previously discussed, the probability of spills or releases of hazardous materials within the City is considered low (City of Beverly Hills 2019b). As such, the Hazard Mitigation Plan 2010-2015 and Local Hazard Mitigation Action Plan 2017-2022 do not address plans for a hazardous materials incident or emergency evacuation. The City anticipates the next update of the hazard mitigation plan to include discussion of construction for the Metro Purple Line Extension. Specifically, the next plan update will address hazard mitigation strategies as they relate to terrorism and critical infrastructure, including the Metro Purple Line station.

Table 3.8-1 Hazardous Materials Sites within the Combined RSA

Figure 3.8-2 ID	Site Name	Address	Type	Status
1	Beverly Wilshire Hotel	9500 Wilshire Blvd.	Permitted UST	Active
2	Chevron #9-3532	9378 Wilshire Blvd.	LUST Cleanup Site	Case Closed as of January 1991
2	Chevron #9-3532	9378 Wilshire Blvd.	LUST Cleanup Site	Case Closed as of September 2004
2	Harold W Butler Chevron #9-3532	9378 Wilshire Blvd.	LUST Cleanup Site	Case Closed as of January 2006
3	Clarity Realty Partners, LLC Parking Structure	100 N Crescent Dr.	LUST Cleanup Site	Case Closed as of November 2013
4	Jurgenson's Market	409 N Beverly Dr.	LUST Cleanup Site	Case Closed as of April 1997
5	Nason Family Trust	223 S Beverly Dr.	LUST Cleanup Site	Case Closed as of December 1995
6	William Morris Agency	151 S El Camino Dr.	LUST Cleanup Site	Case Closed as of April 2007

Notes:

UST = underground storage tanks

LUST = leaking underground storage tanks

As discussed in the City's Emergency Operations Plan, the Beverly Hills Fire Department (BHFD) has primary responsibility in hazardous materials incidents and will respond on basic hazardous materials incidents. The Los Angeles County Fire Department is the Administering Agency for hazardous materials as required by Chapter 6.95 of the Health and Safety Code. The Los Angeles City Fire Department Hazardous Materials Emergency Response Team provides mutual aid, and the Los Angeles County Fire Department provides assistance if the Los Angeles City Fire Department cannot, either with their resources or through the Master Mutual Aid plan. All response procedures follow the Los Angeles County Hazardous Materials Plan (City of Beverly Hills 2013).

Beverly Hills is not intersected by any major freeways. However, major thoroughfares in the area include Wilshire Boulevard, Santa Monica Boulevard, and Sunset Boulevard. In addition, the streets within the RSA are generally organized in a grid. These major thoroughfares and organized street planning typically allow for short emergency response times within the RSA (Citygate 2010).

Proximity to Schools

Public schools within the City are administered by the BHUSD. The BHUSD consists of two transitional kindergarten through 5th grade elementary schools, one 6th grade through 8th grade middle school, and one 9th grade through 12th grade high school (BHUSD 2019).

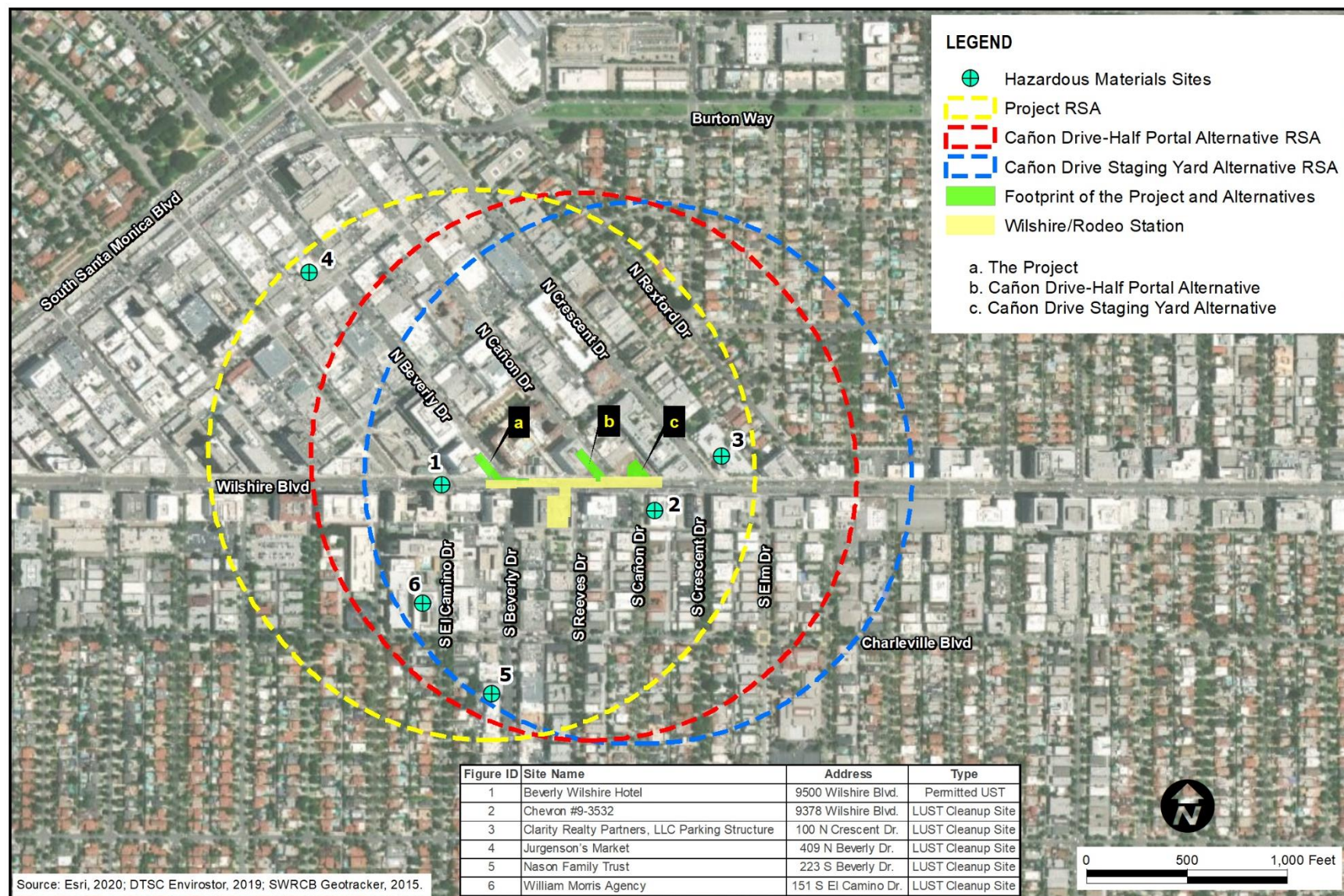


Figure 3.8-2 Hazardous Materials Sites within RSA boundaries for the Project and Alternatives

Beverly Vista Middle School at 200 South Elm Drive is the only public school within the combined RSA. Beverly Vista Middle School is approximately 1,150 feet southeast of the Cañon Drive-Half Portal Alternative, 1,000 feet southeast of the Cañon Drive Staging Yard Alternative, and approximately 1,550 feet southeast of the Project.

There are no private schools, official daycare centers, or preschools within the combined RSA.

Proximity to Airports

The Project and Project Alternative sites are not located within an airport land use plan or within 2 miles of a public airport. The nearest airport to the Project and Project Alternative sites is the Santa Monica Airport, located approximately 4 miles to the southwest.

Wildland Fires

Wildland fires often begin unnoticed, spread quickly, and are usually signaled by dense smoke that may be visible from miles around. They can be human-caused through acts such as arson or campfires, or can be caused by natural events such as lightning. Interface or intermix fires (also referred to as urban-wildland interface fires) occur in areas where both vegetation and structures provide fuel.

Wildland fires can endanger human life and existing structures to the extent that they occur or originate in developed or partially developed areas. Historically, wildland fires have occurred in the hills north of Sunset Boulevard within the City (City of Beverly Hills 2013).

CAL FIRE's Fire Resource and Assessment Program provides Fire Hazard Severity Zone maps showing the severity of the threat of wildfires and the designation of responsibility for fire protection. Based on the Fire Hazard Severity Zone map for the City of Beverly Hills, the Project and Project Alternatives sites are located outside of designated fire hazard severity zones (CAL FIRE 2011).

3.8.4 Impact Evaluation

Impact HAZ-1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts related to routine transport, use, or disposal of hazardous materials were evaluated in Metro's previous separate environmental review process. No impacts related to routine transport, use, or disposal of hazardous materials would occur beyond those previously analyzed in the Purple Line EIR.

The Project and Project Alternatives

Construction Impacts

Construction of the Project and Project Alternatives would require utility relocations, excavation, structure construction, and site restoration. No hazardous materials sites are located within the footprints for the Project and Project Alternatives, and the LUST sites within the combined RSA were considered closed cases. The Beverly Wilshire Hotel UST is permitted and subject to inspections by the SWRCB and cleanup should a leak be found. As such, the potential to encounter contaminated soils and groundwater from nearby hazardous materials sites during construction activities for the Project and Project Alternatives is low. Additionally, a dewatering permit would be obtained from the Los Angeles Regional Water Quality Control Board (LARWQCB) prior to construction, as discussed in Section 3.9 (Hydrology/Water Quality). The permit would require treatment of any contaminated waters prior to discharge; therefore, the impacts related to contaminated groundwater would be minimized. If any contaminated soils and groundwater are encountered during construction activities, construction-related impacts could be considered potentially significant. The Project and Project Alternatives would implement Mitigation Measure HAZ-A, discussed in Section 3.8.5 below, to ensure that impacts would be less than significant. The Project and Project Alternatives would also comply with local, state, and federal regulations and standards in place for the transportation, use, and disposal of hazardous materials. With implementation of Mitigation Measure HAZ-A and compliance to existing regulations and the dewatering permit, construction impacts related to the routine transport, use, or disposal of hazardous materials would be less than significant.

Operational Impacts

It is anticipated that operations and maintenance of the Project and Project Alternatives would include limited quantities of hazardous materials, such as oils, paints, solvents, and cleaners, which are not acutely hazardous. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials. The Project and Project Alternatives would handle and store all materials in compliance with all codes, standards, and regulations. Therefore, impacts related to the routine transport, use, or disposal of hazardous materials during operation would be less than significant.

Impact HAZ-2. 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

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts related to the accidental release of hazardous materials were evaluated in Metro's previous separate environmental review process. No impacts related to creating 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 would occur beyond those identified in the Purple Line Extension EIR.

The Project and Project Alternatives

Construction Impacts

As discussed in HAZ-1, the potential to encounter contaminated soils and groundwater from nearby hazardous materials sites during construction activities for the Project and Project Alternatives is low. Construction of the Project and Project Alternatives would use limited quantities of hazardous materials, such as fuels, which are not considered acutely hazardous. As is typical in construction, there exists a potential for hazardous materials and waste spills to occur. Nevertheless, the storage and disposal of hazardous materials and waste is highly regulated, and would be conducted in accordance with all federal and state regulatory requirements that are intended to prevent or manage hazards. If a spill does occur, it would be remediated accordingly. All hazardous materials, soils, drums, trash, and debris would be handled, removed, and disposed of in accordance with state and federal regulatory guidelines at a licensed Class I, II, or III disposal facility, depending on the amount and type of material encountered. Therefore, construction impacts related to creating 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 would be less than significant.

Operational Impacts

It is anticipated that operations and maintenance of the Project and Project Alternatives would include limited quantities of hazardous materials, such as oils, paints, solvents, and cleaners, which are not acutely hazardous. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials. Storage and disposal of hazardous materials and waste would be conducted in accordance with all federal and state regulatory requirements that are intended to prevent or manage hazards, and if a spill does occur, it would be remediated accordingly. Therefore, operational impacts related to creating 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 would be less than significant.

Impact HAZ-3. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts related to the hazardous emissions or handling hazardous materials within one-quarter mile of a school were evaluated in Metro's previous separate environmental review process. No impact related to emitting hazardous emissions or handle hazardous materials within one-quarter mile of a school would occur.

The Project (Beverly Drive)

Construction Impacts

The Project would not be located within one-quarter mile of an existing or proposed school. The school nearest to the Project site is Beverly Vista Middle School, approximately 1,531 feet (0.29 miles) southeast of the Project. No construction impacts related to emitting hazardous emissions or handling hazardous materials within one-quarter mile of a school would occur.

Operational Impacts

The Project would not be located within one-quarter mile of an existing or proposed school. The school nearest to the Project site is Beverly Vista Middle School, located approximately 1,531 feet (0.29 miles) southeast of the Project. No operational impacts related to emitting hazardous emissions or handling hazardous materials within one-quarter mile of a school would occur.

Cañon Drive-Half Portal Alternative

Construction Impacts

The school nearest to the Cañon Drive-Half Portal Alternative is Beverly Vista Middle School, approximately 1,150 feet (0.22 miles) southeast of the Cañon Drive-Half Portal Alternative. Construction of the Cañon Drive-Half Portal Alternative is not anticipated to emit any hazardous materials, and would use limited quantities of hazardous materials, such as fuels, which are not considered acutely hazardous. Any transport of hazardous materials used during construction of this alternative would be regulated by local, state, and federal standards from Occupational Safety and Health Administration (OSHA), the State of California Occupational Safety and Health Administration, USDOT, and the BHFD. As such, the transport of hazardous materials would not affect Beverly Vista Middle School. Therefore, impacts related to emitting hazardous emissions or handling hazardous materials within one-quarter mile of a school during the construction of the Cañon Drive-Half Portal Alternative would be less than significant.

Operational Impacts

It is anticipated that operations and maintenance of the Cañon Drive-Half Portal Alternative would include limited quantities of hazardous materials, such as oils, paints, solvents, and cleaners. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials. The Cañon Drive-Half Portal Alternative would handle and store all materials in compliance with all codes, standards, and regulations. As such, the transport of hazardous materials would not affect Beverly Vista Middle School. Therefore, impacts regarding the accidental release of hazardous materials into the environment during operation of the Cañon Drive-Half Portal Alternative would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

The school nearest to the Cañon Drive Staging Yard Alternative is Beverly Vista Middle School, which is approximately 1,000 feet (0.19 miles) to the southeast. Construction of the Cañon Drive Staging Yard Alternative is not anticipated to emit any hazardous materials, and would use limited quantities of hazardous materials, such as fuels, which are not considered acutely hazardous. Any transport of hazardous materials used during construction of this alternative

would be regulated by local, state, and federal standards from OSHA, the State of California Occupational Safety and Health Administration, USDOT, and the BHFD. As such, the transport of hazardous materials would not affect Beverly Vista Middle School. Therefore, impacts related to emitting hazardous emissions or handling hazardous materials within one-quarter mile of a school during the construction of the Cañon Drive Staging Yard Alternative would be less than significant.

Operational Impacts

It is anticipated that operations and maintenance of the Cañon Drive Staging Yard Alternative would include limited quantities of hazardous materials, such as oils, paints, solvents, and cleaners. No industrial uses or activities are proposed that would result in the use or discharge of unregulated hazardous materials. This alternative would handle and store all materials in compliance with applicable codes, standards, and regulations. As such, the transport of hazardous materials would not affect Beverly Vista Middle School. Therefore, impacts regarding the accidental release of hazardous materials into the environment during operation of the Cañon Drive Staging Yard Alternative would be less than significant.

Impact HAZ-4. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts related to hazardous materials sites were evaluated in Metro's previous separate environmental review process. Therefore, no impacts related to being located on a site included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 would occur.

The Project and Project Alternatives

Construction and Operational Impacts

According to the DTSC EnviroStor and SWRCB Geotracker databases, none of the sites of the Project or Project Alternatives are located on listed hazardous materials sites. Therefore, no impacts related to being located on a site included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 would occur.

Impact HAZ-5. 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, result in a safety hazard or excessive noise for people residing or working in the project area;

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. The nearest airport is the Santa Monica Airport, approximately 4 miles to the southwest. As such, no impacts related to safety hazards or excessive noise for people residing or working in the Project and Project Alternatives area would occur.

The Project and Project Alternatives

Construction and Operational Impacts

The Project and Project Alternatives sites are located approximately 4 miles northeast of the Santa Monica Municipal Airport. The Project and Project Alternatives are not within an area covered by an airport land use plan, nor are they within 2 miles of a public airport. As such, no impacts related to safety hazards or excessive noise for people residing or working in the Project and Project Alternatives area would occur.

Impact HAZ-6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to emergency response and evacuation were evaluated in Metro's previous separate environmental review process. Traffic control and management measures previously adopted by Metro for the construction of the Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still be implemented under the No Project Alternative, which would ensure emergency response is not impacted. As such, no impacts related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would occur.

The Project (Beverly Drive)

Construction Impacts

As discussed in the City's Emergency Operations Plan, the BHFD has primary responsibility in hazardous materials incidents. The City of Beverly Hills Police Department is also highly prepared to respond to hazardous materials incidents and conducts trainings related to hazardous materials incidents (nuclear, biological, chemical, biological, incendiary, and

explosive) related to terrorism, as discussed in the City's Hazard Mitigation Plan. During construction of the Project, access disruptions may occur as North Beverly Drive would be closed for the duration of the construction between Wilshire Boulevard and Beverly Cañon Gardens. Two lanes on Wilshire Boulevard would also be temporarily closed; however, five lanes would remain open allowing for the continued operation of two westbound and two eastbound lanes plus the westbound left-turn pocket onto South Beverly Drive. Detour routes to the site and access for emergency vehicles would be available adjacent to the Project, via Wilshire Boulevard. As a result of initial coordination with BHFD, it was determined that emergency vehicle access would likely be maintained during construction with the open access at the alleys located east and west of Beverly Drive. Compliance with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments in the City of Beverly Hills would be required and construction contractor coordination with police and fire departments would ensure that the closures would not impair implementation of emergency response. Additionally, emergency vehicles, including fire trucks and ambulances, have sirens that would alert construction vehicle drivers to yield ROW to emergency vehicles, as required under the California Vehicle Code (§ 21806(a)(1)). The implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a traffic management plan (TMP), and coordination for emergency vehicle access (refer to Section 3.12.5, Mitigation Measures for Transportation) to reduce the potential obstructing of emergency vehicles. As such, impacts related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be less than significant.

Operational Impacts

Following the completion of construction activities, all lanes on Wilshire Boulevard would be reopened for use. However, the Project would permanently take the southbound right-turn lane on Beverly Drive for the length (approximately 190 to 200 feet) of the proposed new portal entrance. As permanent changes to the configuration of Beverly Drive would continue to allow for the passage of both northbound and southbound traffic, operation of the Project would not impair implementation of or physically interfere with an emergency response or evacuation plan. Additionally, the project team would coordinate with the BHFD and the police department to ensure that any emergency response issues related to the permanent lane changes would be adequately addressed as part of the design of the Project. As such, operational impacts related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

As discussed in the City's Emergency Operations Plan, the BHFD has primary responsibility in hazardous materials incidents. The City of Beverly Hills Police Department is also highly prepared to respond to hazardous materials incidents and conducts trainings related to hazardous materials incidents (nuclear, biological, chemical, biological, incendiary, and explosive) related to terrorism, as discussed in the City's Hazard Mitigation Plan. During construction, access disruptions may occur as North Cañon Drive would be closed for the duration of the construction phase between the Clifton Way intersection and Wilshire Boulevard. While emergency services would still be able to access the site from the north, the majority of the traffic movements to and from the site are anticipated to be via Wilshire Boulevard. One lane of Wilshire Boulevard would also be required to be closed for the duration of construction and

turns from Wilshire Boulevard onto North Cañon Drive would be prohibited; however, construction traffic and emergency services would be exempt from this restriction. During pile installation, and installation and removal of the decking, temporary closure of a second lane of Wilshire Boulevard would be undertaken. This would reduce westbound traffic to one lane. Detour routes to the site and access for emergency vehicles would be available and exemptions to allow for emergency service access would be in place. As a result of initial coordination with BHFD, it was determined that emergency vehicle access would likely be maintained during construction with the open access at the alleys located east and west of Cañon Drive. Compliance with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments in the City of Beverly Hills would be required. Construction contractor coordination with police and fire departments would also occur to ensure that the closures would not impair implementation of emergency response. As discussed for the Project above, emergency vehicles, including fire trucks and ambulances, have sirens that will alert construction vehicle drivers to yield right-of-way to emergency vehicles. The implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access (refer to Section 3.12.5, Mitigation Measures for Transportation) to reduce the potential obstructing of emergency vehicles. As such, impacts related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan during construction would be less than significant.

Operational Impacts

Following the completion of construction activities, the lanes that were closed on Wilshire Boulevard during construction would be reopened for use. Lane geometries on Cañon Drive and Wilshire Boulevard would remain as is. The configuration of Cañon Drive would continue to allow for the passage of both northbound and southbound traffic, operation of the Cañon Drive-Half Portal Alternative would not impair implementation of or physically interfere with an emergency response or evacuation plan. Additionally, the project team is coordinating with the BHFD to ensure that any emergency response issues would be adequately addressed as part of the design of the Cañon Drive-Half Portal Alternative. As such, operational impacts related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

As discussed in the City's Emergency Operations Plan, the BHFD has primary responsibility in hazardous materials incidents. The City of Beverly Hills Police Department is also highly prepared to respond to hazardous materials incidents and conducts trainings related to hazardous materials incidents (nuclear, biological, chemical, biological, incendiary, and explosive) related to terrorism, as discussed in the City's Hazard Mitigation Plan. During construction of the Cañon Drive Staging Yard Alternative, access disruptions may occur as one lane of Wilshire Boulevard would be closed, and the site boundary would extend slightly into North Cañon Drive. Additionally, installation of the southern pile line would require temporary closure of a second lane of Wilshire Boulevard reducing westbound traffic to one lane. This work may be performed during nighttime and weekend closures to limit access and traffic disruptions. Detour routes to the site and access for emergency vehicles would be available and exemptions to allow for emergency service access would be in place. As a result of initial coordination with BHFD, it was determined that emergency vehicle access would likely be

maintained during construction with the open access at the alley located west of the site. Compliance with all applicable City codes and regulations pertaining to emergency response and evacuation plans maintained by the police and fire departments in the City of Beverly Hills would be required. Construction contractor coordination with police and fire departments would also occur to ensure that the closures would not impair implementation of emergency response. Additionally, emergency vehicles, including fire trucks and ambulances, have sirens that will alert construction vehicle drivers to yield right-of-way to emergency vehicles. The implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access (refer to Section 3.12.5, Mitigation Measures for Transportation) to reduce the potential obstructing of emergency vehicles. As such, impacts related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan during construction would be less than significant.

Operational Impacts

Following the completion of construction activities, all roads would be reopened for use. The Cañon Drive Staging Yard Alternative would not require any permanent changes to roads. As such, operation of this alternative would not impair implementation of or physically interfere with an emergency response or evacuation plan. As such, operational impacts related to impairing implementation of or physically interfering with an adopted emergency response plan or emergency evacuation plan would be less than significant.

Impact HAZ-7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. The Project and Project Alternatives are not located in a very high fire hazard severity zone. Therefore, no impacts related to exposing people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires would occur.

The Project and Project Alternatives

Construction Impacts

The Project and Project Alternatives sites are located in an urban area and are not within or adjacent to any designated wildland fire hazard areas. Flammable brush, grass, or dense trees do not exist on the sites of the Project and Project Alternatives. Prior to final plan approvals, the City would require the construction contractor to comply with all applicable codes, regulations, and standard conditions of approval for fire protection. The developer would be required to provide proof of compliance with all applicable building and fire code requirements. These requirements include, but are not limited to, types of roofing materials, building construction, access and design, fire sprinkler systems, and other hazard reduction programs as set forth by the BHFD and the Uniform Fire Code. Therefore, no impacts related to exposing people or

structures to a significant risk of loss, injury, or death involving wildland fires during construction would occur.

Operational Impacts

Project operations are not anticipated to increase the risk of wildland fires. The Project and Project Alternatives are in an urban area and are not within or adjacent to any designated wildland fire hazard areas. Therefore, no operational impacts related to exposing people or structures to a significant risk of loss, injury, or death involving wildland fires would occur.

3.8.5 Mitigation Measures

HAZ-A If contaminated groundwater or soils are encountered during construction of the Project or Cañon Drive-Half Portal Alternative, the contractor shall stop work in the vicinity, cordon off the area, and contact the appropriate hazardous waste coordinator and maintenance hazardous spill coordinator and immediately notify the Certified Unified Program Agencies (Los Angeles City Fire Department, Los Angeles County Fire Department, and LARWQCB) responsible for hazardous materials and wastes. Through coordination with the LARWQCB, an investigation and remediation plan shall be developed to protect public health and the environment. The contractor shall properly treat or dispose of any hazardous or toxic materials according to local, state, and federal regulations.

Implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for Transportation) and would ensure that any potential impacts to emergency response plans or emergency evacuation plans are less than significant for the Project and Project Alternatives.

3.8.6 Impacts after Mitigation

Upon implementation of Mitigation Measure HAZ-A, potentially significant impacts related to the routine transport, use, or disposal of contaminated groundwater and soils would remain less than significant.

Upon implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D (described in Section 3.12.5, Mitigation Measures for Transportation), potentially significant impacts related to emergency response plans or emergency evacuation plans would be reduced to a level less than significant.

3.8.7 Cumulative Impacts

No Project Alternative

Construction of the related projects would be required to comply with applicable federal, state, and local regulations that govern hazardous materials. As no impacts were identified in the analysis of the No Project Alternative, the No Project Alternative would not contribute to a cumulative impact related to hazardous materials.

The Project and Project Alternatives

Construction Impacts

Related projects within approximately one-mile of the Project and Project Alternatives generally include commercial and residential construction or expansion. Construction of the related projects would be required to comply with applicable federal, state, and local regulations that govern hazardous materials. As discussed above, the Project and Project Alternatives would also be required to comply with applicable federal, state, and local regulations governing hazardous materials, which would generally result in less than significant construction impacts related to hazardous materials. Additionally, any impacts related to increased traffic congestion during construction would be minimized with the TMP prepared for the Project and Project Alternatives. Any hazardous materials incidents for the Project and Project Alternatives would be localized and minimized with immediate remediation. As such, the Project and Project Alternatives would not have cumulatively considerable construction impacts related to hazardous materials.

Operational Impacts

Related projects within approximately one-mile of the Project and Project Alternatives generally include commercial and residential construction or expansion, which do not include industrial uses or activities that would result in the use or discharge of unregulated hazardous materials. The related projects would be required to comply with applicable federal, state, and local regulations concerning hazardous materials. The Project and Project Alternatives would also be required to comply with applicable federal, state, and local regulations governing hazardous materials. Additionally, the project team is coordinating with the BHFD and police department to ensure that any emergency response issues related to permanent lane changes are adequately addressed. Any hazardous materials incidents for the Project and Project Alternatives would be localized and minimized with immediate remediation. As such, the Project and Project Alternatives would not have cumulatively considerable operational impacts related to hazardous materials.

3.9 Hydrology/Water Quality

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to hydrology, water quality, and groundwater. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. The section describes the affected environment and analyzes the environmental consequences of the Project and Project Alternatives and, if applicable, provides mitigation measures.

3.9.1 Regulatory Setting

Federal

Clean Water Act of 1972, Amended 1977 (33 U.S. Code 1251-1376)

The Federal CWA of 1972 established and implemented the National Pollutant Discharge Elimination System (NPDES) Permit Program to regulate and control the discharge of pollutants into waters of the U.S. (WoUS). National goals were set to regulate point-source and non-point-source discharges into receiving waters and achieve water quality standards suitable for fish, wildlife, and recreation. The CWA provides authority for establishing these water quality standards and specific technology-based effluent limitations that are enforceable as permit conditions. In California, issuance of NPDES permits has been delegated, through a process referred to as primacy, to the State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCBs) who implement and enforce the requirements of the CWA. Section 303(d) of the CWA requires states to identify water bodies that do not meet, or are not expected to meet, water quality standards. Section 401 of the CWA requires a State Water Quality Certification to show that a proposed project would comply with state water quality standards for the protection of the physical, chemical, and biological integrity of waters. Section 402 of the CWA established the NPDES permit program, which is required for construction activities larger than 1 acre and prohibits discharges not allowed under the permit. Section 402 of the CWA also requires municipal, industrial, and commercial facilities discharging wastewater and/or stormwater directly from a point source to obtain coverage under the NPDES permit. Section 404 established a program to regulate the discharge of dredged or fill material into WoUS and requires a permit from USEPA and USACE before dredged or fill materials can be discharged into WoUS. The Project and Project Alternatives would require an NPDES permit for dewatering so all water discharged during dewatering activities would meet NPDES water quality requirements.

Federal Emergency Management Agency – Executive Order 11988

Executive Order 11988 requires federal agencies to avoid to the extent possible the long- and short-term adverse impacts associated with the occupancy and modification of floodplains, and to avoid direct and indirect support of floodplain development wherever there is a practicable alternative. The order requires USACE to minimize the impacts of floods and to restore and preserve beneficial values to floodplains. The Federal Emergency Management Agency (FEMA) is responsible for overseeing the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. Flood Insurance Rate Maps (FIRM) are issued by FEMA and identify areas prone to

flooding. These maps also identify flood hazard zones in the community. The Project and Project Alternatives would not occupy or modify a floodplain.

State

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne Act) was established to protect water quality in the State of California and is responsible for creating the State's extensive regulatory program for water pollution control. Pursuant to the Porter-Cologne Act, the responsibility for protection of water quality in California rests with SWRCB. In turn, the Porter-Cologne Act has delegated the regulation of the hydrologic basin to the nine RWQCBs to regulate the nine hydrologic basins in the state. The Porter-Cologne Act gives SWRCB broad authority to establish water quality standards and discharge requirements, adopt water quality control plans, and implement provisions under the CWA, with the goal of protecting the beneficial uses of existing water bodies. Under the Porter-Cologne Act, the RWQCBs have the authority to specify certain conditions or areas where the discharge of waste, or certain types of waste, will not be permitted.

Under the authority of the Porter-Cologne Act, the RWQCBs require persons who discharge or propose to discharge waste that could affect the quality of waters in the State to file a Report of Waste Discharge with the appropriate RWQCB. RWQCB then issues or waives Waste Discharge Requirements (WDRs) for the discharge or requires the discharger to enroll under the NPDES permit or WDR order. The Project and Project Alternatives would not discharge waste that could affect the quality of waters in the State.

State Water Resources Control Board

The SWRCB was established in 1967 by the California State Legislature and has the authority over water resources allocation and water quality protection within the State. The mission of SWRCB is "to preserve, enhance, and restore the quality of California's water resources, and ensure their proper allocation and efficient use, for the benefit of present and future generations." The SWRCB allocates water rights, adjudicates water right disputes, develops statewide water protection plans, establishes water quality standards, and guides the nine RWQCBs. The SWRCB also regulates discharges from construction, industrial, and municipal activities; dredge and fill activities; the alteration of any federal water body; and several other activities with practices that could degrade water quality.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) was signed into law in September 2014 and provides a framework for improved management of groundwater by local authorities. The SGMA establishes a definition of sustainable groundwater management, requires that local agencies develop groundwater management plans and implement strategies to sustainably manage groundwater resources, prioritizes basins with the greatest need, and sets a timeline for implementation.

As an active stakeholder in the Memorandum of Understanding forming the Santa Monica Groundwater Sustainability Agency (GSA), the City can protect its interests in the Santa Monica Basin in the future should it decide to extract additional groundwater supplies from the Santa Monica Basin as an additional source of supply. Currently, the City of Beverly Hills only pumps

groundwater from the Hollywood Basin and does not pump groundwater out of the Santa Monica Basin. The Hollywood Basin is not subject to the SGMA.

Regional

Los Angeles Regional Water Quality Control Board

The LARWQCB protects ground and surface water quality in the Los Angeles Region, including the coastal watersheds of Los Angeles and Ventura Counties, along with very small portions of Kern and Santa Barbara Counties. The LARWQCB issues the Los Angeles County Municipal Separate Storm Sewer System (MS4) Permit (Order No. R4-2012-0175-A01, NPDES No. CAS004001). The permit covers the Los Angeles County Flood Control District, the County of Los Angeles, and 84 incorporated cities within the Los County Flood Control District, including the City of Beverly Hills. The permit covers the permittees for their contributions to discharges of stormwater and urban runoff from MS4s (i.e. storm drain systems), as well as Los Angeles River Watershed and Ballona Creek Watershed Trash Total Maximum Daily Load. The discharges flow to water courses within the Los Angeles County Flood Control District and into receiving waters of the Los Angeles Region. Discharges are covered under countywide WDRs contained in Order No. 96-054 originally adopted by the LARWQCB in 1996. These WDRs also serve as the NPDES permit for discharge of municipal stormwater.

Under the MS4 permit, permittees must require developers to implement Best Management Practices (BMPs) during and post construction activities, such as the implementation of Stormwater Pollution Prevention Plan (SWPPP) during construction phase and Low Impact Development (LID) BMPs for post construction, as applicable. The purpose of these BMPs are to reduce pollutant discharges from the stormwater conveyance systems during and post construction activities.

The LARWQCB issues the General NPDES Permit CAG994004 (LARWQCB Order No. R4-2018-0125), Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties, which allows for the discharge of treated or untreated groundwater generated from dewatering activities when such discharges will not cause state or federal water quality objectives to be exceeded. This permit would apply to the Project and Project Alternatives due to the potential for dewatering during construction. Dewatering is not anticipated during operations, therefore, a Permanent NPDES Permit would not be required. If shallow groundwater is detected, the portal may be waterproofed and an internal sump system installed.

Los Angeles County Code

Chapter 20.36 of the Los Angeles County code requires that any business that generates, handles, or disposes of industrial wastewater must obtain an industrial waste disposal permit from the Los Angeles County Department of Public Works (LACDPW) Industrial Waste Unit. The Unit's goal is to ensure that facilities are designed to not create a nuisance; menace the public peace, health, or safety; or impact the public sewer system, soil, underground, or surface waters. The Unit reviews plans to determine if facilities have adequate pretreatment systems. The business must obtain clearance and an Industrial Waste Disposal Permit (IWDP) for the discharge of wastewater to sanitary sewers, private disposal systems, or off-site disposal. They must comply with applicable federal, state, and local domestic and industrial waste regulations to be verified by the Unit. This permit would apply to the Project and Project Alternatives due to the potential for dewatering.

Ballona Creek Enhanced Watershed Management Plan (BC-EWMP)

The Ballona Creek Watershed Management Group (BC-WMG) is comprised of the cities of Beverly Hills, Culver City, Inglewood, Los Angeles, Unincorporated Los Angeles County, Santa Monica and West Hollywood. The BC-WMG developed and submitted the BC-EWMP to the Regional Water Quality Control Board in 2016. The BC-EWMP established implementation strategies in individual cities to meet the goals and objectives to achieve an ecologically healthy Ballona Creek Watershed. The plan addresses an area of approximately 130 square miles, roughly bounded by the Santa Monica Mountains and the Hollywood Hills to the north, Interstate 110 to the east, the Baldwin Hills to the south, and the Pacific Ocean to the west. It is intended to support and inform ongoing planning efforts, as well as provide a framework for future projects that are consistent with the goal to restore ecological health to the watershed. Objectives of the plan include the following:

- Implement projects with BMPs and other methods to reduce pollutant loads and improve water quality, consistent with Total Maximum Daily Load (TMDL) implementation that includes: Dry and wet weather runoff management through the implementation of LID BMPs and;
- Pollutant source control generating from the site.

Local

City of Beverly Hills General Plan – Conservation and Safety Elements

The City of Beverly Hills General Plan, amended on January 12, 2010, provides a comprehensive framework that guides the City's development through 2025. The Conservation Element guides the provision of public infrastructure including water, sewer, storm drainage, solid waste, electricity, natural gas, telecommunications, and mineral resources. The Safety Element guides public health and safety, and addresses fire, flood, geologic, and seismic hazards, hazardous materials, and disaster preparedness. The following goals and policies from the Conservation and Safety Elements are applicable to hydrology and water quality.

Goal CON 6: Groundwater Recharge

For a system that recharges the groundwater resources:

CON 6.2 Stormwater. Require that grading plans be designed and implemented to reduce stormwater runoff by capturing rainwater onsite and stored on a temporary, short-term basis to facilitate groundwater recharge rather than relying solely on community drainage facilities. (Imp. 3.4).

CON 6.3 Shallow Groundwater. Further enhance the City's efforts to minimize shallow groundwater being discharged to the stormwater system, and encourage beneficial use instead of dewatering subterranean structures. (Imp. 3.4)

Goal CON 8 Public Safety: Wastewater collection and treatment facilities that operate in a manner that maximizes public safety.

CON 8.1 Monitoring of Toxins. Continue to monitor businesses that may generate toxic or potentially hazardous substances in order to prevent contamination of water and wastewater. (Imp. 3.3, 3.4).

CON 8.2 Waste Discharge Requirements. Continue to require that all industrial and business sewer discharges comply with the City's waste discharge requirements and permits as outlined in the City Ordinance. (Imp. 3.3)

CON 8.3 National Pollutant Discharge Elimination System (NPDES) and South Coast Air Quality Management District (SCAQMD) Regulations. Continue to implement, as appropriate, the requirements of the NPDES and SCAQMD regulations, including requiring the use of Best Management Practices by businesses in the City. (Imp. 3.3)

Goal CON 10: Storm Drainage System

Provision of fiscally sustaining storm drainage system that reduces pollutants entering the ocean.

CON 10.1 Storm Drain Maintenance. Maintain and upgrade public storm drains and storage control facilities, and construct or expand storm drain and flood control facilities, to protect the community from risks to lives and property associated with flooding and stormwater runoff. (Imp. 3.4)

CON 10.3 Storm Runoff Impacts. Require new development to prepare hydrologic studies to assess storm runoff impacts on the local and sub-regional storm drainage systems, and, if warranted, require new development to provide adequate drainage facilities and mitigate increases in stormwater flows and/or cumulative increases in regional flows. Require final drainage plans be submitted for review and approval. (Imp. 2.2)

Goal CON 11: Storm Drainage System that Preserves Water Quality

Provision of a storm drainage system that does not degrade the quality of the City's surface waters, groundwater system, and other sensitive environmental areas.

CON 11.1 Development Mitigation. Require that new development does not degrade surface waters or the groundwater system. (Imp. 2.2)

CON 11.3 National Pollutant Discharge Elimination System (NPDES) Permit. Require developers to obtain and comply with a NPDES permit from SWRCB. (Imp. 2.2, 3.4)

Goal S 4: Protection from Flood Hazards

To reduce the potential risk of flood hazards to human life and public and private property:

S 4.1 Flood Mitigation Design. Require that new development incorporate sufficient measures to mitigate flood hazards, including the design of onsite drainage systems linking with Citywide storm drainage, gradation of the site so that runoff does not impact adjacent properties or structures on the site, and elevation of the structures above any flooding elevation. (Imp. 2.3, 3.4)

S 4.2 Permeable Surface Area. Require the use of permeable surfaces for new development and redevelopment, including alleys and driveways for residential, commercial, and City properties.

S 4.3 Storm Drain Clearance. Research and implement new technologies to prevent trash and debris from entering stormwater drains. (Imp. 3.4)

Beverly Hills Municipal Code

Title 6 (Utilities and Franchises) of the Beverly Hills Municipal Code (BHMC) addresses the City's utility services related to water, wastewater, solid waste, telecommunications, and utility districts. Article 3 (Wastewater System) of Title 6 regulates the construction and operation of wastewater systems and the discharge of wastewater into the City's wastewater system and includes permitting requirements for wastewater discharge.

Title 9 (Building and Property Health and Safety Regulations) of the BHMC includes regulations that govern water conservation, stormwater and urban runoff, and water supply. Article 5 (Stormwater and Urban Runoff Pollution Control) of Chapter 4 is intended to protect and enhance the quality of watercourses, water bodies, and wetlands within the City in a manner consistent with the federal CWA, the Porter-Cologne Act, and the municipal NPDES permit. The article also sets forth requirements for the construction and operation of certain developments and other projects, which are intended to ensure compliance with the stormwater mitigation measures prescribed in the current version of the municipal NPDES permit. Specifically, Section 9-4-507 regulates industrial and commercial construction activities and requires compliance with the NPDES permit. Section 9-4-508 establishes requirements for construction activities and facility operations of development and redevelopment projects to comply with the current municipal NPDES permit, to lessen the water quality impacts of development by using smart growth practices, and integrate LID practices and standards for stormwater pollution mitigation through means of infiltration, evapotranspiration, biofiltration, and rainfall harvest and use. Article 6 (Water Supply) is the City's Water Supply Ordinance, which regulates, manages, conserves, protects, and preserves the City's water supply, including groundwater resources. Section 9-4-610 of the BHMC requires a permit for extracting water from a basin or basin drainage area. The Project and Project Alternatives would be subject to the BHMC as applicable.

City of Beverly Hills Stormwater Program

The City of Beverly Hills Stormwater Program was established to meet the requirements of the federal CWA, the Porter-Cologne Act, and the municipal NPDES permit. The City's stormwater program requires developers to implement an Erosion and Sediment Control Plan (ESCP) or SWPPP during construction that includes sediment control BMPs (silt fence, sand bag barrier, stabilized construction site entrance/exit, sediment and dust control); waste management BMPs (stockpile management, spill prevention control, solid waste management, sanitary and septic waste management); erosion control BMPs (scheduling and preservation of existing vegetation); and non-stormwater management (water conservation practices and dewatering operations). The Project and Project Alternative would be subject to the requirements of an ESCP. A SWPPP would not be required as the Project and Project Alternative sites would be less than one acre.

3.9.2 Methodology and CEQA Thresholds

Resource Study Area

The resource study area (RSA) for the Project and Project Alternatives includes the Ballona Creek Watershed for impacts related to water quality, Hollywood Subbasin for impacts related to groundwater, and City of Beverly Hills for impacts related to drainage and flooding, as described in Section 3.9.3, Existing Conditions below and shown in Figure 3.9-10.

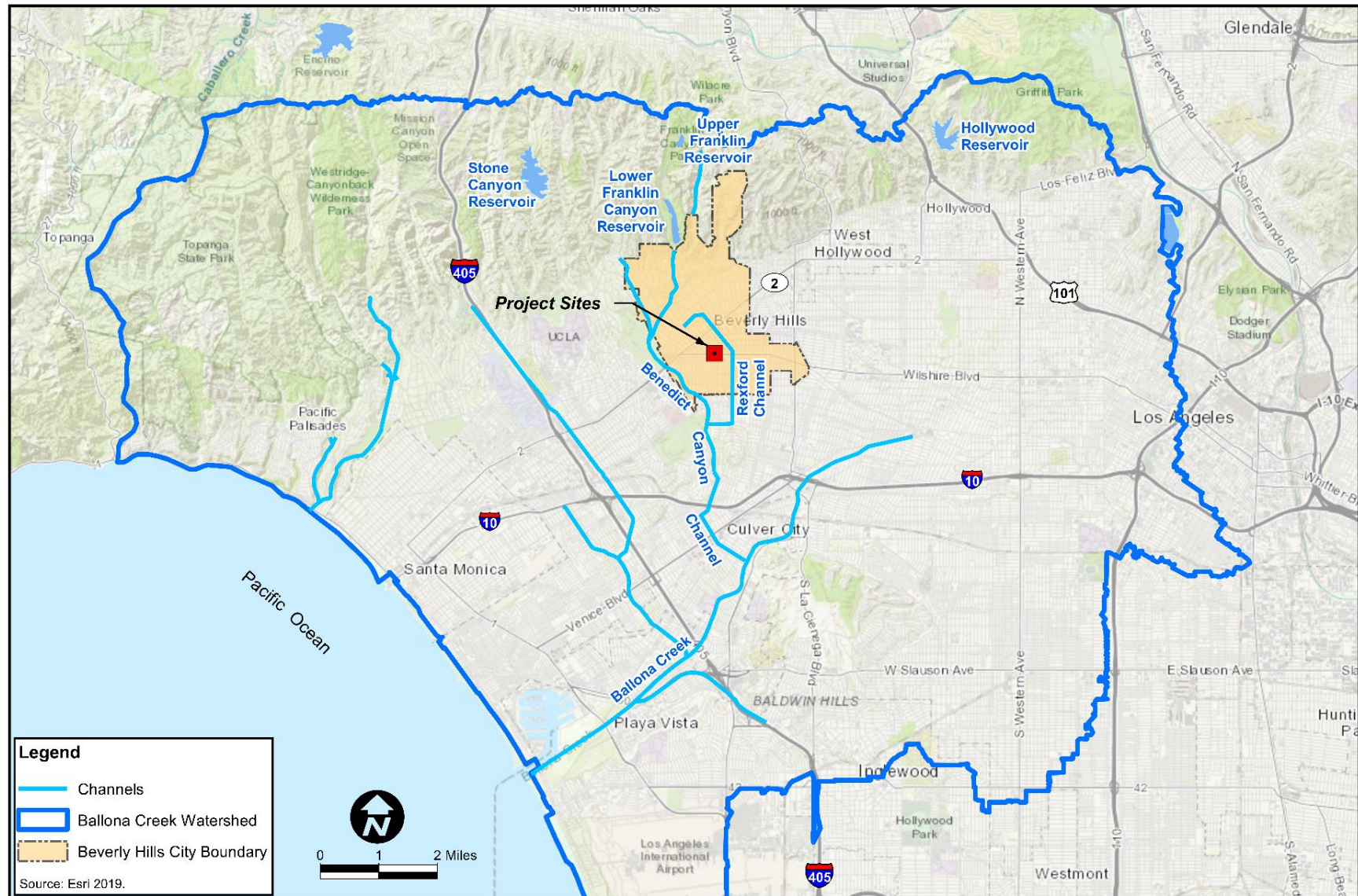


Figure 3.9-10: Hydrology and Water Quality RSA

Methodology

To determine the impacts to hydrology and water quality, existing data on hydrology, drainage patterns, groundwater resources, water quality, and floodplains were evaluated. The following documents and agency websites were reviewed:

- City of Beverly Hills
 - General Plan and associated Technical Background Reports
 - Municipal Code
 - Urban Water Management Plan
 - Community Development and Public Works department webpages
- Metro Westside Subway Extension Final EIS/EIR and Supplemental EIS
- U.S. Geological Survey watershed and drainage basin maps
- State Water Resources Control Board
- FEMA flood maps
- Aerials from Google Earth
- Ballona Creek Enhanced Watershed Management Plan

The Project and Project Alternatives were also analyzed for compliance with applicable regulations that function to maintain and improve current water quality conditions. Project activities were assessed to determine their potential impact on groundwater recharge, existing drainage patterns, and the potential to release pollutants due to water-related hazards during construction and operation. The Project and Project Alternatives were also analyzed for potential construction-related surface water sedimentation, generated by erosion and runoff from proposed staging areas; and for potential increases in impervious surface area and associated potential increases in stormwater runoff volumes and pollutant loadings following construction. Potential impacts were then analyzed against applicable significance criteria (as described below). Where a potentially significant impact would be anticipated, proposed mitigation measures to address these potential effects were developed.

CEQA Thresholds

In accordance with Appendix G of the State CEQA Guidelines, an impact is considered significant if (except as provided in Public Resources Code Section 21099) the project would:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality;
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
 - a. result in a substantial erosion or siltation on- or off-site;
 - b. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

- c. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or
 - d. impede or redirect flood flows;
- 4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and/or
- 5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

3.9.3 Existing Conditions

Watershed

Regional Drainage

The City of Beverly Hills is located in the Ballona Creek Watershed in the northwestern portion of the Los Angeles Basin. The Ballona Creek Watershed spans approximately 130 square miles and is comprises all or parts of the cities of Beverly Hills, Culver City, Inglewood, Los Angeles, Santa Monica, and West Hollywood, and unincorporated Los Angeles County. Ballona Creek is a 9-mile-long flood protection channel that drains the Los Angeles Basin, from the Santa Monica Mountains on the north, Interstate 110 on the east, and Baldwin Hills on the south. The major tributaries to Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains. Approximately 40 percent of the watershed is covered by impervious surfaces. As such, infiltration of precipitation to groundwater has been reduced (City of Beverly Hills 2005).

Ballona Creek is predominately channelized and highly developed along the channel with both commercial and residential properties. Most of the drainage network is controlled by structural flood control measures, including debris basins, storm drains, underground culverts, and open concrete channels. Former streams in the major canyons have been channelized and remain open channels at various locations, although some have been converted to underground flood control channels such as Benedict Canyon Creek (City of Beverly Hills 2005).

Local Drainage

The Project and Project Alternatives are located in the northern portion of the Ballona Creek Watershed. The Project and Project Alternatives are in an area characterized as heavily urbanized and covered with impervious surfaces such as asphalt, concrete, buildings, and some landscaping. The City of Beverly Hills is predominantly flat, with a slight incline gradient when traveling in a northerly direction. Storm runoff is channeled into multiple storm drains and drainages, maintained by the City of Beverly Hills and Los Angeles County Flood Control District (LACFCD). The City's storm drain system is designed to prevent flooding by carrying away excess rainwater from City streets to the ocean via Ballona Creek. Urban runoff flows into these storm drains and in most cases flows directly to the ocean (City of Beverly Hills 2010). Ballona Creek, which ultimately drains into Santa Monica Bay, is the main receiving drainage channel for runoff adjacent to the Project and Project Alternatives (Metro 2010). Before reaching Ballona Creek, runoff throughout the study area drains to tributaries including Benedict Canyon

Channel, approximately 1.2 miles southwest of the Project and Project Alternatives (Metro 2010).

The Project and Project Alternatives are within Region 2 of the City's hydrologic regions as designated by the Storm Drain System Management Plan (City Beverly Hills 2010). Region 2 drains the south-central area of the City to the underground Rexford Channel. This region encompasses approximately 652 acres (1 square mile). The tributary area is generally bordered on the north by Elevado Avenue, Rexford Drive, and Santa Monica Boulevard; on the west by Camden Drive, Roxbury Drive, and Peck Drive; on the east by Palm Drive and Maple Drive; and on the south by Pico Boulevard. Region 2 is in the flatlands area of the City and is primarily residential and commercial land uses (City of Beverly Hills 2005).

Surface Water

No surface water features are located in the City of Beverly Hills.

Groundwater

The City of Beverly Hills is on the Coastal Plain of the Los Angeles Groundwater Basin. The Project and Project Alternatives are in the Hollywood Subbasin, which lies beneath the northeastern part of the Central Coastal Plain and has a surface area of 10,500 acres (16.4 square miles). The Hollywood Subbasin is bounded by the Santa Monica Mountains and Hollywood fault on the north, Elysian Hills on the east, Inglewood fault zone on the west, and La Brea High on the south. Surface stream flows and subsurface inflows from the Santa Monica Mountains naturally replenish groundwater in the Hollywood Subbasin. However, the majority of the surface area in Beverly Hills is completely urbanized, which restricts percolation of rain water into the ground (City of Beverly Hills 2011).

The City of Beverly Hills manages the Hollywood Subbasin through municipal ordinances, which regulate the production of groundwater, prohibit waste, protect water quality, and require dewatering activities to mitigate adverse impacts on the Hollywood Basin. Currently, the City receives about 10 percent of its water supply from this groundwater resource (City of Beverly Hills 2011).

Water Quality

Responsibility for the protection of surface water and groundwater quality in California rests with the SWRCB and nine RWQCBs. The LARWQCB has jurisdiction over the coastal drainages between Rincon Point on the coast of western Ventura County and the eastern Los Angeles County line (LARWQCB 2014).

Surface Water Quality

Surface water quality is impacted by a variety of activities, such as illegal discharge and channelization, and from increased development. There is a strong correlation between decreasing water quality and new developments that increase impervious surfaces. As more land is developed and more impervious surfaces are created, groundwater recharge is affected as well as the volume, rate, and quality of surface water runoff. Urban runoff flows into storm drains and into creeks, rivers, lakes, and the ocean (City of Beverly Hills 2005).

Ballona Creek Watershed collects runoff from several partially urbanized canyons on the south slopes of the Santa Monica Mountains as well as from intensely urbanized areas of West Los

Angeles, Culver City, Beverly Hills, Hollywood, Inglewood, Santa Monica, and parts of central Los Angeles (LARWQCB 2014). Because 49 percent of the watershed is covered by impervious surfaces, it is particularly vulnerable to pollutants such as trash, metal, bacteria, and pesticides that run off into storm drains (City of Beverly Hills 2018). As directed by the federal CWA, the SWRCB adopts a list of impaired water bodies (the 303(d) list) for the state of California, which currently includes Ballona Creek. The 303(d) list identifies water quality impairments including trash, metals, pathogens, and organic pesticides. Elevated constituent levels restrict the beneficial uses of the watershed (SWRCB 2018).

Groundwater Quality

Groundwater quality is vulnerable to the following activities: dry cleaning operations, park areas, residential housing, historical railroad ROWs, vehicle repair shops, gasoline stations, confirmed leaking underground storage tanks, utility station, parking lots, and government equipment storage areas. In 2019, the City of Beverly Hills' Water Utilities Bureau tested for over 185 different types of constituents at City owned groundwater wells, distribution system monitoring sites, Metropolitan Water District's (MWD) connections, and reservoirs. Also, the water that the City purchases from MWD is tested for over 400 different types of constituents (lakes, rivers, transmission mains and treatment plants) (City of Beverly Hills 2020).

Flooding/Tsunami/Seiche

The Project and Project Alternatives are located in FEMA FIRM Panel 06037C1585F under Flood Zone X, an area of minimal flood hazards outside the Special Flood Hazard Area and higher than the elevation of the 0.2-percent-annual-chance flood (FEMA 2019). In addition to FEMA-designated flood zones, the City also has two locally-designated flood hazard areas; the Project and Project Alternatives are not in locally-designated flood hazard areas (City of Beverly Hills 2010).

Portions of Beverly Hills are threatened by flooding from the City's five aboveground reservoirs, one partially belowground reservoir, and one belowground reservoir located beneath a City parking lot (Greystone Reservoir). Damage to the structures caused by an earthquake, however, would probably be a minor breach, which would allow time for warning and reduction of the stored water in the reservoir. The City also lies in the inundation path of the Lower Franklin Canyon Reservoir north of the City. In the event of a breach of this reservoir, the residential area north of Carmelita Drive would be exposed to immediate and severe danger. Below that point, the danger diminishes rapidly although flooding of most structures in this section of the inundation path would occur (City of Beverly Hills 2010). The Project and Project Alternatives sites are south of Carmelita Drive, which reduces the danger of flooding from the Lower Franklin Canyon Reservoir.

The Project and Project Alternatives sites are approximately 7 miles from the coast of the Pacific Ocean. The City of Beverly Hills is predominantly flat and away from crests and very steep ridges. Generally, the Project and Project Alternatives sites are in an area characterized as heavily urbanized and developed. Tsunamis and seiches are not identified as issues in the City's Hazard Mitigation Action Plan 2010-2015 (City of Beverly Hills 2010).

3.9.4 Impact Evaluation

Impact HYD-1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to water quality would occur beyond those already anticipated by construction of the Purple Line Extension Project.

The Project (Beverly Drive)

Construction Impacts

Construction of the Project would require utility relocations, piling, excavation, and dewatering. Based on geotechnical explorations conducted for the Wilshire/Rodeo Station in 2015, groundwater seepage or perched groundwater conditions adjacent to the Project and Project Alternatives were encountered at depths as shallow as 32 feet below ground surface (Metro 2016). As such, construction of the Project would require dewatering during excavation. Construction activities have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as from runoff from construction equipment. As discussed in Section 3.9.1 above, the City's stormwater program requires developers to implement an ESCP during construction. The ESCP developed for the Project would require implementation of site-specific construction erosion BMPs, which may include temporary sediment control BMPs; waste management BMPs; erosion control BMPs; and non-stormwater management. Implementation of the ESCP would ensure impacts related to water quality standards and waste discharge requirements would be less than significant during construction.

For dewatering activities, a dewatering permit would be required from the City of Beverly Hills and discharge permits would be required from the LARWQCB and LACPW prior to construction. Pursuant to Section 9-4-610 of the BHMC, a permit is required for extracting water from a basin or basin drainage area to ensure proper water extraction during construction. The permit also requires compliance with all federal, state, and local laws and regulations. A discharge permit would be obtained from the LARWQCB for discharges in the storm drain systems prior to construction. It is anticipated that dewatering flows would be processed on-site to remove oils and solids and then discharged to the local storm drain or sewer systems, according to permitting requirements. Contaminated natural water would require additional treatment and disposal procedures. Any contaminated natural groundwater encountered would be managed by the implementation of Mitigation Measure HAZ-A as discussed in Section 3.8 (Hazards and Hazardous Materials). Additionally, an industrial waste permit would be obtained from LACPW for the discharge of wastewater to sanitary sewers, private disposal systems, or off-site disposal. Depending on the anticipated discharge flows at each excavation location, the excess flow capacity in the sewer systems would be checked to determine the optimal discharge point(s). With implementation of Mitigation Measure HAZ-A and BMPs, and compliance with permit requirements during construction activities, impacts related to water quality standards or waste discharge requirements would be less than significant during construction.

Operational Impacts

The Project site is primarily within the public ROW, which consists of impermeable roadways and sidewalks. With implementation of the Project, impermeable surfaces at the Project site would be similar to existing conditions and no net increase in impermeable surface area would occur. As such, stormwater flows from the Project site would be similar to existing conditions during operation of the Project. In addition, pursuant to NPDES requirements and the BHMC, the Project would implement LID BMPS as applicable to manage surface runoff flows. Any runoff leaving the Project site would continue to drain to the existing storm drain inlets in the surrounding area. Therefore, impacts to water quality during operation of the Project would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

Similar to construction of the Project, construction of the Cañon Drive-Half Portal Alternative would require utility relocations, piling, excavation, and dewatering. Construction activities have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as from runoff from construction equipment. As discussed in Section 3.9.1 above, the City's stormwater program requires developers to implement an ESCP during construction. The ESCP developed for the Cañon Drive-Half Portal Alternative would require implementation of site-specific construction erosion BMPs, which may include temporary sediment control BMPs; waste management BMPs; erosion control BMPs; and non-stormwater management. Implementation of the ESCP would ensure impacts related to water quality standards and waste discharge requirements would be less than significant.

Similar to the Project, dewatering permits from the City of Beverly Hills, and discharge permits from LARWQCB and LACPW would be required prior to construction. Pursuant to Section 9-4-610 of the BHMC, a permit is required for extracting water from a basin or basin drainage area to ensure proper water extraction during construction. The permit also requires compliance with all federal, state, and local laws and regulations. A discharge permit would be obtained from the LARWQCB for discharges in the storm drain systems prior to construction. It is anticipated that dewatering flows would be processed on-site to remove oils and solids and then discharged to the local storm drain or sewer systems, according to permitting requirements. Contaminated natural water would require additional treatment and disposal procedures. Any contaminated natural groundwater encountered would be managed by the implementation of Mitigation Measure HAZ-A. Additionally, an industrial waste permit would be obtained from LACPW for the discharge of wastewater to sanitary sewers, private disposal systems, or off-site disposal. Depending on the anticipated discharge flows at each excavation location, the excess flow capacity in the sewer systems would be checked to determine the optimal discharge point(s). With implementation of Mitigation Measure HAZ-A and BMPs, and compliance with permit requirements during construction activities, impacts related to water quality standards or waste discharge requirements would be less than significant during construction.

Operational Impacts

The site for the Cañon Drive-Half Portal Alternative is primarily within the public ROW, which consists of impermeable roadways and sidewalks. With implementation of the Cañon Drive-Half Portal Alternative, impermeable surfaces at the site would be similar to existing conditions and no net increase in impermeable surface area would occur. As such, stormwater flows from the site would be similar to existing conditions during operation of the Cañon Drive-Half Portal

Alternative. In addition, pursuant to NPDES requirements and the BHMC, the Cañon Drive-Half Portal Alternative would implement LID BMPs as applicable to manage surface runoff flows. Any runoff leaving the site would continue to drain to the existing storm drain inlets in the surrounding area. Therefore, impacts to water quality during operation of the Cañon Drive-Half Portal Alternative would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

The Cañon Drive Staging Yard Alternative would require piling, excavation, and dewatering. Construction activities have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as from runoff from construction equipment. As discussed in Section 3.9.1 above, the City's stormwater program requires developers to implement an ESCP during construction. The ESCP would require implementation construction erosion BMPs, which may include temporary sediment control BMPs; waste management BMPs; erosion control BMPs; and non-stormwater management. Implementation of the ESCP would ensure impacts related to water quality standards or waste discharge requirements would be less than significant during construction.

Similar to the Project, a dewatering permit would be required from the City of Beverly Hills and discharge permits would be required from the LARWQCB, and LACPW prior to construction. Pursuant to Section 9-4-610 of the BHMC, a permit is required for extracting water from a basin or basin drainage area to ensure proper water extraction during construction. The permit also requires compliance with all federal, state, and local laws and regulations. A discharge permit would be obtained from the LARWQCB for discharges in the storm drain systems prior to construction. It is anticipated that dewatering flows would be processed on-site to remove oils and solids and then discharged to the local storm drain or sewer systems, according to permitting requirements. Contaminated natural water would require additional treatment and disposal procedures. Any contaminated natural groundwater encountered would be managed by the implementation of Mitigation Measure HAZ-A. Additionally, an industrial waste permit would be obtained from LACPW for the discharge of wastewater to sanitary sewers, private disposal systems, or off-site disposal. Depending on the anticipated discharge flows at each excavation location, the excess flow capacity in the sewer systems would be checked to determine the optimal discharge point(s). With implementation of Mitigation Measure HAZ-A and BMPs, and compliance with permit requirements during construction activities, impacts related to water quality standards or waste discharge requirements would be less than significant during construction.

Operational Impacts

The site of the Cañon Drive Staging Yard Alternative is in the paved construction staging yard established for the Section 2 project and public ROW. With implementation of the Cañon Drive Staging Yard Alternative, impermeable surfaces at the site would be similar to existing conditions and there would be no net increase in impermeable surface area. As such, stormwater flows from the site would be similar to existing conditions during operation of the Cañon Drive Staging Yard Alternative. In addition, pursuant to NPDES requirements and the BHMC, the Cañon Drive Staging Yard Alternative would implement LID BMPs as applicable to manage surface runoff flows. Any runoff leaving the site would continue to drain to the existing storm drain inlets in the surrounding area. Therefore, impacts to water quality during operation of the Cañon Drive Staging Yard Alternative would be less than significant.

Impact HYD-2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to groundwater supplies or groundwater recharge would occur beyond those already anticipated by construction of the Purple Line Extension Project.

The Project (Beverly Drive)

Construction Impacts

As discussed under Impact HYD-1, geotechnical explorations conducted for the Wilshire/Rodeo Station in 2015 determined that groundwater seepage or perched groundwater conditions adjacent to the Project and Project Alternatives were encountered at depths as shallow as 32 feet below ground surface (Metro 2016). As such, construction of the Project would require dewatering during excavation. The geotechnical explorations further determined that groundwater inflows into the station excavation could be controlled with strategically located dewatering wells supplemented with gravel-filled trenches and sump pumps (Metro 2016). Depending on the anticipated discharge flows at each excavation location, the excess flow capacity in the sewer systems would be checked to determine the optimal discharge point(s). It is anticipated that approximately 4 million gallons of water would be discharged per year of construction, and final dewatering and groundwater pumping rates would be estimated during final geotechnical investigations and pump tests. As discussed in Section 3.9.1 above, Section 9-4-610 of the BHMC requires a permit for extracting water from a basin or basin drainage area. The permit would ensure proper water extraction during construction and requires compliance with all federal, state, and local laws and regulations. The permit also requires that, unless impracticable, extracted groundwater shall be used for reasonable and beneficial use, including recharging the groundwater to the basin, placing groundwater to reasonable and beneficial use on the property including irrigation or other non-potable use, or delivering the groundwater to the City for treatment and use by the City. The Project would use dewatered groundwater for dust control and irrigation to the extent feasible, and would discharge the remaining dewatered groundwater in accordance with LARWQCB discharge permit requirements.

A dewatering permit would be required from the City of Beverly Hills and a discharge permit from LARWQCB prior to construction. Any contaminated natural groundwater encountered would be managed by the implementation of Mitigation Measure HAZ-A. Uncontaminated natural groundwater collected during construction dewatering would be used for irrigation, dust control purposes, and mixing slurry to the extent feasible.

The Project site is in the Hollywood Subbasin, which has a surface area of 10,500 acres. The Project site is primarily paved, and the impermeable surface area at the Project site would not substantially interfere with the amount of percolation that could infiltrate into the ground during construction.

Compliance with the requirements of the City dewatering permit and LARWQCB discharge permit would ensure that impacts related to decreasing groundwater supplies or interfering substantially with groundwater recharge would be less than significant during construction.

Operational Impacts

Following construction, dewatering activities would cease. The impermeable surface area at the Project site would be similar to existing conditions and would not substantially change the amount of percolation that could infiltrate into the ground. No net increase in impermeable surface area would occur. In addition, LID BMPs would be implemented as applicable to manage surface runoff from the portal. Therefore, impacts related to decreasing groundwater supplies or interfering substantially with groundwater recharge would be less than significant during operation.

Cañon Drive-Half Portal Alternative

Construction Impacts

Similar to the Project, groundwater seepage or perched groundwater conditions in the area were encountered at depths as shallow as 32 feet below ground surface during geotechnical explorations conducted for the Wilshire/Rodeo Station in 2015; therefore, it was determined that construction of the Cañon Drive-Half Portal Alternative would require dewatering for excavation. The geotechnical explorations further determined that groundwater inflows into the station excavation could be controlled with strategically located dewatering wells supplemented with gravel-filled trenches and sump pumps (Metro 2016). Depending on the anticipated discharge flows at each excavation location, the excess flow capacity in the sewer systems would be checked to determine the optimal discharge point(s). It is anticipated that approximately 4 million gallons of water would be discharged per year of construction, and final dewatering and groundwater pumping rates would be estimated during final geotechnical investigations and pump tests. As discussed in Section 3.9.1 above, Section 9-4-610 of the BHMC requires a permit for extracting water from a basin or basin drainage area. The permit would ensure proper water extraction during construction and requires compliance with all federal, state, and local laws and regulations. The permit also requires that, unless impracticable, extracted groundwater shall be placed to reasonable and beneficial use, including recharging the groundwater to the basin, placing groundwater to reasonable and beneficial use on the property including irrigation or other non-potable use, or delivering the groundwater to the City for treatment and use by the City. The Cañon Drive-Half Portal Alternative would use dewatered groundwater for dust control and irrigation to the extent feasible, and would discharge the remaining dewatered groundwater in accordance with LARWQCB discharge permit requirements.

A discharge permit would also be required from the LARWQCB prior to construction. Any contaminated natural groundwater encountered would be managed by the implementation of Mitigation Measure HAZ-A. Uncontaminated natural groundwater collected during construction dewatering would be used for irrigation, dust control purposes, and mixing slurry to the extent feasible.

The Cañon Drive-Half Portal Alternative site is in the Hollywood Subbasin, which has a surface area of 10,500 acres. The site is primarily paved, and the impermeable surface area at the site would not substantially interfere with the amount of percolation that could infiltrate into the ground during construction.

Compliance with the requirements of the City dewatering permit and LARQWCB discharge permit would ensure that impacts related to decreasing groundwater supplies or interfering substantially with groundwater recharge would be less than significant during construction.

Operational Impacts

Following construction, dewatering activities would cease. The area of impermeable surface at the site would be similar to existing conditions and would not substantially change the amount of percolation that could infiltrate into the ground. In addition, LID BMPs would be implemented as applicable to manage surface runoff from the portal. Therefore, impacts related to decreasing groundwater supplies or interfering substantially with groundwater recharge would be less than significant during operation.

Cañon Drive Staging Yard Alternative

Construction Impacts

Similar to the Project, groundwater seepage or perched groundwater conditions in the area were encountered at depths as shallow as 32 feet below ground surface during geotechnical explorations conducted for the Wilshire/Rodeo Station in 2015; therefore, it was determined that construction of the Cañon Drive Staging Yard Alternative would require dewatering for excavation. The geotechnical explorations further determined that groundwater inflows into the station excavation could be controlled with strategically located dewatering wells supplemented with gravel-filled trenches and sump pumps (Metro 2016). Depending on the anticipated discharge flows at each excavation location, the excess flow capacity in the sewer systems would be checked to determine the optimal discharge point(s). It is anticipated that approximately 4 million gallons of water per year of construction would be required, and final dewatering and groundwater pumping rates would be estimated during final geotechnical investigations and pump tests. As discussed in Section 3.9.1 above, Section 9-4-610 of the BHMC requires a permit for extracting water from a basin or basin drainage area. The permit would ensure proper water extraction during construction and requires compliance with all federal, state, and local laws and regulations. The permit also requires that, unless impracticable, extracted groundwater shall be placed to reasonable and beneficial use, including recharging the groundwater to the basin, placing groundwater to reasonable and beneficial use on the property including irrigation or other non-potable use, or delivering the groundwater to the City for treatment and use by the City. The Cañon Drive Staging Yard Alternative would use dewatered groundwater for dust control and irrigation to the extent feasible, and would discharge the remaining dewatered groundwater in accordance with LARWQCB discharge permit requirements.

A discharge permit would also be required from the LARWQCB prior to construction. Any contaminated natural groundwater encountered would be managed by the implementation of Mitigation Measure HAZ-A. Uncontaminated natural groundwater collected during construction dewatering would be used for irrigation, dust control purposes, and mixing slurry to the extent feasible.

The site of the Cañon Drive Staging Yard Alternative is in the Hollywood Subbasin, which has a surface area of 10,500 acres. The site is primarily paved, and the impermeable surface area at the site would not substantially interfere with the amount of percolation that could infiltrate into the ground during construction.

Compliance with the requirements of the City dewatering permit and LARQWCB discharge permit would ensure that impacts related to decreasing groundwater supplies or interfering substantially with groundwater recharge would be less than significant during construction.

Operational Impacts

Following construction, dewatering activities would cease. The impermeable surface area at the site would be similar to existing conditions and would not substantially change the amount of percolation that could infiltrate into the ground. In addition, LID BMPs would be implemented as applicable to manage surface runoff from the portal. Therefore, impacts related to decreasing groundwater supplies or interfering substantially with groundwater recharge would be less than significant during operation.

Impact HYD-3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in a substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Impacts related to drainage would not occur beyond those already anticipated from the Purple Line Extension Project.

The Project and Project Alternatives

Construction Impacts

Construction of the Project and Project Alternatives would require piling and excavation. The Project and Cañon Drive-Half Portal Alternative would also require utility relocations and dewatering. These activities have the potential to affect catch basins or storm drain structures adjacent to the Project and Project Alternatives. Existing utilities would be extended to the Project site and Cañon Drive-Half Portal Alternative site temporarily for water and sanitary sewer. Two storm drains within the Project site and one storm drain within the Cañon Drive-Half Portal Alternative site would be rerouted and/or temporarily suspended during construction activities to avoid upstream flooding. Any runoff leaving the Cañon Drive Staging Yard Half-Portal Alternative site would continue to drain to the existing storm drain inlets in the surrounding area.

Erosion or Siltation

The Project and the Project Alternatives would not alter the course of any streams or rivers. No surface water bodies are located within the City of Beverly Hills. The Project and Project Alternatives sites and surrounding area are completely developed and would not be susceptible to substantial erosion from uncontrolled runoff. As discussed under Impact HYD-1, an ESCP,

which would include sediment control BMPs such as silt fences, sand bag barriers, stabilized construction site entrance/exit, and sediment and dust control, would be implemented during construction. The ESCP would prevent sediment flow into a water source. As such, the Project and Project Alternatives would not result in a substantial increase in erosion or siltation on- or off-site during construction. The impact would be less than significant.

Flooding

The Project and Project Alternatives are not in locally-designated flood hazard areas. The Project and the Project Alternatives are not susceptible to flooding as the area is predominantly flat, with a slight incline gradient when traveling in a northerly direction. Prior to construction activities, two storm drains within the Project site and one storm drain within the Cañon Drive-Half Portal Alternative site would be rerouted and/or temporarily suspended during construction activities so that flooding or ponding is not induced within the sites or adjacent properties, as well as to avoid upstream flooding. Any runoff within or leaving the Cañon Drive Staging Yard Alternative site would continue to drain to the existing storm drain inlets in the surrounding area. As such, impacts related to substantially increased runoff volumes would not result in flooding on- or off-site during construction. The impact would be less than significant.

Stormwater Drainage Capacity

Prior to construction activities, two storm drains within the Project site and one storm drain within the Cañon Drive-Half Portal Alternative site would be rerouted and/or temporarily suspended to avoid upstream flooding. Existing utilities would be extended to serve the Project site and Cañon Drive-Half Portal Alternative site temporarily for water and sanitary sewer. During construction activities of the Project and Cañon Drive-Half Portal Alternative, dewatering would be required. As discussed under Impact HYD-2, extracted groundwater would be used for reasonable and beneficial use, such as using the water on the property for irrigation or other non-potable use, pursuant to Section 9-4-610 of the BHMC. During construction activities for the Cañon Drive Staging Yard Half-Portal Alternative, water would also be used for activities such as dust control and mixing slurry. It is not anticipated that the Project and Project Alternatives would generate runoff water such that an exceedance of the capacity of the existing storm drainage system would occur during construction. The impact would be less than significant.

Impede or Redirect Flood Flows

The Project and the Project Alternatives would not alter the course of any streams or rivers. As previously discussed, there are no surface water bodies located in the City of Beverly Hills. The Project and Project Alternatives are not susceptible to flooding and are not within a local flood area as the area is predominantly flat, with a slight incline gradient when traveling in a northerly direction. Prior to construction activities, two storm drains within the Project site and one storm drain within the Cañon Drive-Half Portal Alternative site would be rerouted and/or temporarily suspended during construction activities so that flooding or ponding is not induced within the sites or adjacent properties, as well as to avoid upstream flooding. Any runoff within or leaving the Cañon Drive Staging Yard Half-Portal Alternative site would continue to drain to the existing storm drain inlets in the surrounding area. As such, impacts related to impeding or redirecting flood flows would be less than significant.

Operational Impacts

Following construction, utilities would be restored back to their original condition. The area of impermeable surfaces at the Project and Project Alternatives sites would be similar to existing

conditions. As such, surface water runoff flows from the Project and Project Alternatives sites would be similar to existing conditions during operations. In addition, pursuant to NPDES requirements and the BHMC, the Project and Project Alternatives would implement LID BMPs as applicable to manage surface runoff flows. Any runoff leaving the sites would continue to drain to the existing storm drain inlets in the surrounding area. Development of the Project and Project Alternatives would not introduce new surface water discharges substantially increase runoff volumes, result in flooding on- or off-site, or impede or redirect flood flows. The impact would be less than significant.

Impact HYD-4. Result in flood hazard, tsunami, or seiche zones, or risk release of pollutants due to project inundation.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Impacts related to release of pollutants due to project inundation would not occur beyond those already anticipated from the Purple Line Extension Project.

The Project and Project Alternatives

Construction Impacts

The Project and Project Alternatives are in a FEMA-designated minimal flood hazard area, but not within locally-designated flood hazard areas. The Project and Project Alternatives are also outside of the area within the City that may be severely threatened by flooding or seiche from the Greystone and Lower Franklin Canyon Reservoirs. The Project and Project Alternatives are approximately 1.78 miles south of the below-grade Greystone Reservoir. As discussed above in Section 3.9.3, the Project and Project Alternatives are south of Carmelita Drive, which, according to the City's General Plan, reduces the danger of flooding from the Lower Franklin Canyon Reservoir. The risk of a tsunami is negligible as the Project and Project Alternatives are 7 miles from the Pacific Ocean. Therefore, the risk release of pollutants during construction of the Project and Project Alternatives due to inundation from flood hazard, tsunami, or seiche zones is less than significant.

Operational Impacts

The impacts related to the risk of release of pollutants due to inundation from flood hazard, tsunami, or seiche zones during Project and Project Alternatives operation would be the same as during construction discussed above. Impacts would be less than significant.

Impact HYD-5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by

Metro. Impacts related to conflict with implementation of a water quality control plan or sustainable groundwater management plan would not occur beyond those anticipated by the Purple Line Extension Project.

The Project and Project Alternatives

Construction Impacts

As discussed under Impacts HYD-1 and HYD-2, construction erosion BMPs would be implemented for the Project and Project Alternatives and would not violate water quality standards. Dewatering activities required for the Project and Cañon Drive-Half Portal Alternative would require a dewatering permit from the City of Beverly Hills and discharge permits from LARWQCB, and LACPW prior to construction. Any contaminated natural groundwater encountered would be managed by the implementation of Mitigation Measure HAZ-A. The City's dewatering permit requires that, unless impracticable, extracted groundwater shall be placed to reasonable and beneficial use, including recharging the groundwater to the basin, placing groundwater to reasonable and beneficial use on the property including irrigation or other non-potable use, or delivering the groundwater to the City for treatment and use by the City. Uncontaminated natural groundwater collected during construction dewatering would be used for irrigation, dust control, and mixing slurry to the extent feasible. The remainder of the dewatered groundwater would be discharged to the storm drain systems in accordance with LARWQCB discharge permit requirements.

It is not anticipated that the Project and Cañon Drive-Half Portal Alternative would decrease the amount of stormwater entering the groundwater table through an increase in the amount of impermeable surfaces, or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin as the Project and Cañon Drive-Half Portal Alternative sites are primarily paved.

With implementation of Mitigation Measure HAZ-A and BMPs, and compliance with existing regulations during construction activities, the Project and Cañon Drive-Half Portal Alternative would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The impact would be less than significant.

As discussed under Impact HYD-2, it is not anticipated that construction of the Cañon Drive Staging Yard Half-Portal Alternative would encounter groundwater or change the area of impermeable surface at the site such that it could substantially interfere with the amount of percolation that could infiltrate into the ground. Therefore, the Cañon Drive Staging Yard Half-Portal Alternative would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The impact would be less than significant.

Operational Impacts

During operation, any runoff leaving the Project and Project Alternatives sites would continue to drain to the existing storm drain inlets in the surrounding area. In addition, LID BMPs would be implemented to manage surface runoff flows as applicable. Wastewater generated during operation would be collected and transported through existing local, trunk, and mainline sewers. As such, the Project and Project Alternatives would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. The impact would be less than significant.

3.9.5 Mitigation Measures

Implementation of Mitigation Measure HAZ-A (discussed in Section 3.8, Hazards and Hazardous Materials) would ensure that potential impacts related to water quality standards or waste discharge requirements during construction would be less than significant for the Project and Project Alternatives.

3.9.6 Impacts after Mitigation

Any contaminated natural groundwater encountered during the construction of the Project and Project Alternatives would be managed by the implementation of Mitigation Measure HAZ-A, compliance with existing regulations and the provisions of the City of Beverly Hills, LARWQCB, and LACPW dewatering permits. Any contaminated natural groundwater would be treated until it meets the required permit limits prior to discharging to either the storm drain or the waste water systems. Impacts related to water quality standards or waste discharge requirements during construction would be reduced to less than significant.

3.9.7 Cumulative Impacts

No Project Alternative

Related projects identified within approximately 1 mile of the Project and Project Alternatives generally include commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning hydrology and water quality.

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to public services were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulative impact related to hydrology and water quality.

The Project and Project Alternatives

Construction Impacts

Related projects identified generally include commercial and residential construction or expansion. Similar to construction of the Project and Project Alternatives, construction of the related projects could potentially disturb or expose sediments, which could degrade water quality. However, the Project and Project Alternatives would implement an ESCP during construction activities that would include site-specific BMPs to ensure that impacts related to water quality would be less than significant. Related projects would also be required to comply with applicable federal, state, and local regulations concerning water quality. Impacts for the Project and Project Alternatives would be localized and minimized, and, as such, cumulative impacts related to substantially degrading water quality would be less than significant.

The Project and Project Alternatives sites and surrounding area are completely developed and generally would not be susceptible to substantial erosion from uncontrolled runoff. An ESCP, which would include sediment control BMPs, would be implemented to prevent sediment flow into a water source during construction activities.

The Project and Project Alternatives would not alter the course of any streams or rivers. If a related project would alter the course of a stream or river, it would be subject to additional compliance with existing federal, state, and local regulations. Therefore, the Project and Project Alternatives, in conjunction with related projects, would not result in a significant cumulative impact related to surface water.

The impact of dewatering from the Project and Project Alternatives would be less than significant as a dewatering permit would be obtained from the City of Beverly Hills and comply with permit requirements of Section 9-4-610 of the BHMC. If related projects also require dewatering at the same time, the impact would still be less than significant, as Section 9-4-610 of the BHMC requires that, unless impracticable, extracted groundwater shall be placed to reasonable and beneficial use, including recharging the groundwater to the basin, placing groundwater to reasonable and beneficial use on the property including irrigation or other non-potable use, or delivering the groundwater to the City for treatment and use by the City. The effects from dewatering would be localized and temporary. Once constructed, the Project and Project Alternatives would not have an impact on lowering the groundwater table or reducing the volume of the underlying aquifer. Cumulative impacts to groundwater would be less than significant.

Operational Impacts

Development of new impervious surfaces, such as the construction of new buildings on vacant lots, would typically increase stormwater runoff and dry weather flows to local drainages and receiving waters. However, any new development would be reviewed and regulated by the City and the LARWQCB, and would be subject to LID BMPs as required by the municipal NPDES Permit (MS4 Permit) to reduce the potential for impacts related to runoff and water quality.

The Project and Project Alternatives are not expected to substantially increase the rate or amount of surface runoff. Post-construction conditions would be similar to existing conditions as the Project would not increase the area of impermeable surfaces at the Project and Project Alternatives sites. In addition, LID BMPs would be implemented as applicable to manage surface runoff flows. Any runoff leaving the sites would continue to drain to the existing storm drain inlets in the surrounding area. As such, the Project and Project Alternatives would not contribute to a cumulatively considerable operational impact related to hydrology or water quality.

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3.10 Noise

This section describes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to noise and vibration. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effect of the Project and Project Alternatives are described herein. This section describes an overview of noise and vibration, regulatory setting, and existing environmental setting, and analyzes the potential noise and vibration impacts of the Project and Project Alternatives during both construction and operational phases, respectively. Mitigation measures are proposed in an effort to reduce significant impacts, as needed.

Noise Overview

Characteristics of Sound

Sound is most commonly experienced by people as pressure waves passing through air. These rapid fluctuations in air pressure are processed by the human auditory system to produce the sensation of sound. The rate at which sound pressure changes occur is called the frequency. Frequency is usually measured as the number of oscillations per second or Hertz (Hz). Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) (California Department of Transportation 2013). The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The A-weighted scale, abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Figure 3.10-1 provides examples of A-weighted noise levels from common sounds.

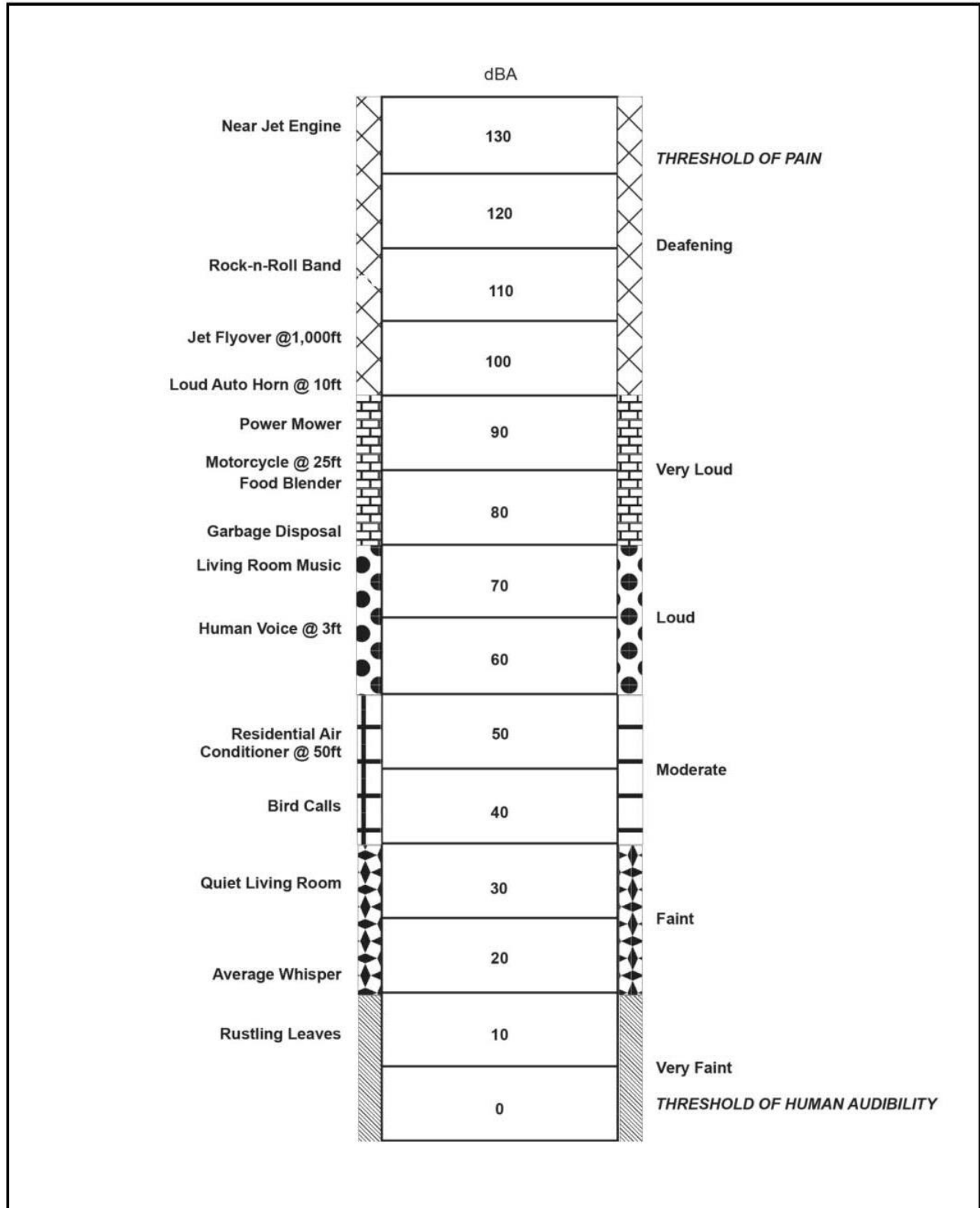
Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or “point source,” decreases by approximately 6 dBA over hard surfaces (e.g., reflective surfaces, such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces, such as soft dirt, grass, or scattered bushes and trees) for each doubling of the distance. For example, if a noise source produces a noise level of 89 dBA at a reference distance of 50 feet, then the noise level is 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on.

Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}). L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for 1 hour is the average energy noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA. The maximum noise level (L_{max}) is as the maximum noise level detected over the noise measurement period, also expressed in dBA.

Effects of Noise

Noise is generally defined as unwanted sound. The degree to which noise can impact the human environment ranges from levels that interfere with speech and sleep (annoyance and nuisance) to levels that cause adverse health effects (hearing loss and psychological effects). Human response to noise is subjective and can vary greatly from person to person. Factors that



Source: Cowan, James P., Handbook of Environmental Acoustics.

Figure 3.10-1 A-Weighted Decibel Scale

influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Generally, noise is most audible when traveling by direct line-of-sight. In urban environments, barriers, such as walls, berms or buildings, are often present, which breaks the line-of-sight between the source and the receiver, and greatly reduces noise levels from the source since sound can only reach the receiver by bending over the top of the barrier. However, if a barrier is not high or long enough to break the line-of-sight from the source to the receiver, its effectiveness is reduced. Construction noise limits are shown below in Table 3.10-1.

Ground-borne Vibration Overview

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium, such as soil or concrete, in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration is also acoustic energy transmitted as waves through the solid medium. The rate at which pressure changes occur is called the frequency of the vibration, measured by the number of oscillations per second or Hz. Vibration may be the form of a single pulse of acoustical energy, a series of pulses, or a continuous oscillating motion.

The way that vibration is transmitted through the ground depends on the soil type, the presence of rock formations or man-made features, and the topography between the vibration source and the receptor location. As a general rule, vibration waves tend to dissipate and reduce in magnitude with distance from the source. Also, the high frequency vibrations are generally attenuated rapidly as they travel through the ground, so that the vibration received at locations distant from the source tends to be dominated by low-frequency vibration. The frequencies of ground-borne vibration most perceptible to humans are in the range from less than 1 Hz to 100 Hz.

Vibration can be a serious concern, causing buildings to shake and rumbling sounds to be heard. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as blasting, pile driving, and heavy earth-moving equipment.

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. In addition, high levels of ground-borne vibration can damage fragile buildings or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes).

Vibration Definitions

Several different methods are used to quantify vibration. The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts to buildings and is usually measured in inches per second. The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal. Decibel notation (Vdb) is commonly used to measure RMS. The Vdb

acts to compress the range of numbers required to describe vibration. Vibration Level (Lv), is expressed as Velocity Level Decibels (Lv, VdB).

Effects of Vibration

When ground-borne vibration arrives at a building, a portion of the energy will be reflected or refracted away from the building, and a portion of the energy will typically continue to penetrate through the ground-building interface. However, once the vibration energy is in the building structure, it can be amplified by the resonance of the walls and floors. Occupants can perceive vibration as motion of the building elements (particularly floors) and also rattling of lightweight components, such as windows, shutters, or items on shelves. At very high amplitudes (energy levels), low-frequency vibration can cause damage to buildings.

Unlike noise, ground-borne vibration is not a phenomenon that most people experience every day. Most perceptible indoor vibration is caused by sources within buildings, such as operation of mechanical equipment, movement of people, or slamming of doors. Typical outdoor sources of perceptible ground-borne vibration are construction equipment and traffic on rough roads. If the roadway is smooth, the vibration from traffic is rarely perceptible. Typical levels of ground-borne vibration are shown in Table 3.10-2.

3.10.1 Regulatory Setting

Federal

Federal Noise Control Act of 1972

The Noise Control Act of 1972 established programs and guidelines to identify and address the effects of noise on public health, welfare, and the environment. In 1981, (USEPA determined that subjective issues such as noise would be better addressed at local levels of government, thereby allowing more individualized control for specific issues by designated federal, state, and local government agencies. Consequently, in 1982, responsibilities for regulating noise control policies were transferred to specific federal agencies, and state and local governments. However, noise control guidelines and regulations contained in the USEPA rulings in prior years remain in place.

The Federal Transit Administration (FTA) has published relevant guidance for assessing potential building damage associated with construction activity. According to the FTA, non-engineered timber and masonry buildings can be exposed to ground-borne vibration levels of 0.2 inches per second without experiencing structural damage. Buildings extremely susceptible to vibration damage (e.g., historic buildings) can be exposed to ground-borne vibration levels of 0.12 inches per second without experiencing structural damage.

Federal Transit Administration Noise and Vibration Impact Assessment Manual

In 2018, the FTA published the *Noise and Vibration Impact Assessment Manual* (FTA 2018). This manual includes procedures for predicting and assessing noise and vibration impacts of proposed transit projects for different stages of project development and different levels of analysis. Additional topics include descriptions of noise and vibration mitigation measures, construction noise and vibration, and strategies for presenting these analyses in environmental documents. Chapter 7 of this manual provides the following guidance for construction noise limits for transit construction projects (Table 3.10-1).

Table 3.10-1 FTA Recommended Construction Noise Limits

Land Use	L _{eq} -equipment (8-hour)	
	Day (dBA)	Night (dBA)
Residential	80	70
Commercial	85	85
Industrial	95	95

Source: FTA 2018, Table 7-3

For the purposes of this section, it is assumed that “residential” land uses also include hotels because hotels include overnight stays similar to residential land uses and therefore are considered more noise sensitive at night. Parks and restaurants would be considered “commercial” land uses because their primary use is not considered more noise sensitive at night.

Chapter 7 of FTA's *Noise and Vibration Impact Assessment Manual* also provides the following construction vibration damage criteria (Table 3.10-2). Non-high-rise residential structures are typically considered Class III structures with a potential damage threshold of 0.2 PPV inches per second, while most commercial structures are considered Class II with a potential damage threshold of 0.3 PPV inches per second.

Table 3.10-2 Construction Damage Criteria

Building/Structural Category	PPV, in/sec	Approximate Lv
I. Reinforced-concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

Notes:

PPV is Peak Particle Velocity, expressed in inches per second (in/sec)

Lv is Vibration Level, expressed Velocity Level Decibels (Lv, VdB)

Source: FTA 2018, Table 7-5

Regional and Local

City of Beverly Hills Municipal Code

The Project and Project Alternatives would be subject to applicable portions of the Beverly Hills Municipal Code (BHMC) Noise Ordinance, as described below and shown in Table 3.10-3.

Section 5-1-202 of the BHMC requires that any noise generated by machinery, equipment, pump, fan, air conditioning apparatus, or similar mechanical device would not cause the noise level at the property line to exceed the ambient noise level by more than 5 dBA.

Section 5-1-205 of the BHMC restricts construction activity during the hours of 6:00 pm to 8:00 am, Monday through Saturday, and at any time on Sunday or public holidays. The Project and Project Alternatives may be granted an after-hours construction permit authorizing work during

restricted hours if the City building official determines that the public interest will be served by such a permit.

Table 3.10-3 City of Beverly Noise Limits

Construction Activity	Noise Limit dBA
Daytime (8:00 am to 6:00 pm), all activities	Daytime Ambient + 5 dBA
Evening (6:00 pm to 9:00 pm), all activities	Evening Ambient + 5 dBA
Nighttime (9:00 pm to 8:00 am), all activities	Nighttime Ambient + 5 dBA

Source: Beverly Hill Municipal Code, Section 5-1-202

3.10.2 Methodology and CEQA Thresholds

Resource Study Area

As shown on Figure 3.10-1, the location of the resources study area (RSA) includes the aboveground construction and operational footprints of the Project and Project Alternatives, and the surrounding area including noise-sensitive receivers or receptors within approximately 500 feet of the proposed construction areas. For the purpose of this analysis, noise-sensitive receptors or receivers would be a structure or land use with some exterior use area, including open spaces such as plazas and parks, single- and multi-family residential structures or hotels with front or rear yards, pools, terraces, patios or balconies, or commercial businesses including shops and restaurants with terraces, or outdoor seating areas. Typical public sidewalks and commercial buildings without an outdoor use area would not be considered noise sensitive. The representative noise-sensitive receivers analyzed for noise impacts are shown in Table 3.10-4 and shown on Figure 3.10-2.

Methodology

Noise

Potential construction noise impacts were determined by predicting construction noise levels using methods consistent with the FHWA Roadway Construction Noise Model (RCNM) and comparing predicted noise levels to identified noise impact thresholds. The prediction methodology begins with a reference noise level and usage factor for each piece of construction equipment to be used, adjusted for the distance from source to receiver, the fractional portion of time that the equipment is operating at full power, and any acoustical shielding that may be present, and then summing together the contributed noise from all sources.

Table 3.10-4 Representative Noise-Sensitive Receivers

ID	Location and Exterior Use
R-1A	Maybourne Beverly Hills Hotel (balconies on west façade)
R-1B	Maybourne Beverly Hills Hotel (roof deck pool)
R-1C	Maybourne Beverly Hills Hotel (balconies on east façade)
R-2	Beverly Canon Gardens Park
R-3	Sterling Plaza (roof-top terraces)
R-4	Citibank Building Plaza (outdoor plaza)
R-5	Beverly Wilshire Hotel (terraces, seating, balconies facing Wilshire Blvd.)
R-6	AKA Beverly Hills Hotel, (balconies and terraces).
R-7	Crescent Park
R-8	Wilshire Crescent, multi-family (balconies)
R-9	Single-family homes
R-10	Sirtaj Hotel (outdoor seating)
R-11	Reeves Park
R-12	Single-family homes
R-13	Single- and multi-family residential; S Canon Dr., starting 200 ft. south of Wilshire Blvd.
R-14	Sixty HD Hotel (roof-top pool and bar)
R-15	Shops on S. Beverly Dr. (sidewalk seating)
R-16	Spago Restaurant (outdoor seating, second level) 176 N. Cañon Drive

Source: Metro 2012 and AECOM 2020



Figure 3.10-2 Noise-Sensitive Receiver and Measurement Locations

The equipment to be used for the various construction phases of the Project are shown in Table 3.10-5.

Table 3.10-5 Acoustical Properties of Construction Equipment

Number of Pieces of Equipment in Use Per Phase and Day/Night Periods				Construction Phase					
				Demolition		Excavation		Construction	
Equipment Type	RCNM Equivalent	L _{max} at 50 feet	AUF%	Day	Night	Day	Night	Day	Night
Jack hammers	Jackhammer	88.9	20	2	0				
Backhoe	Backhoe	77.6	40	1	0				
Front end loader	Front end loader	79.1	40	1	0				
Trucks	Dump trucks	76.5	40	1	0	1	0		
Auger drill	Auger drill rig	84.4	20			1	0		
Excavator	Excavator	80.7	40			1	0		
Crane	Crane	80.6	16			1	0	1	0
Concrete trucks	Concrete mixer truck	78.8	40					1	0
Concrete pumps	Concrete pump truck	81.4	20					1	0
Generator	Generator	80.6	50					1	1
Dewatering pumps	Pumps	80.9	50					2	1
Ventilation fans	Ventilation fan	78.9	100					2	1
Scrubbers	Pumps	80.9	50					1	1
Pneumatic tools	Pneumatic tools	85.2	50					1	0
Pavement roller	Roller	80.0	20					1	0

Notes:

AUF = the Acoustic Use Factor (typical fractional value of time that equipment is operating at full power)

L_{max(ref)} = the maximum operating equipment sound level operating at full power as measured at the reference distance

Source: Metro 2012 and AECOM 2020

For the purpose of this analysis, each phase is generally defined as follows:

- Demolition: remove sidewalks and roadway segments in construction area.
- Excavation: insert soldier piles and excavate area leading down to station box; remove soil.
- Construction: construct station entrance including walls, stairways, elevators, escalators, canopies; rebuild roadway and sidewalks, etc.

Vibration

Potential vibration impacts are evaluated by predicting the construction vibration value (PPV or Lv) from specific pieces of construction equipment at receiver distances and comparing that value to the appropriate potential damage threshold.

CEQA Thresholds

An impact is considered significant if the project would:

1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
2. Generate excessive ground-borne vibration or ground-borne noise levels; and/or
3. For a project located within the vicinity of a private airstrip or 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.

Applicable Thresholds of Significance

Based on review of the Project and Project Alternatives, BHMC, and referenced FTA guidance documents, the following thresholds of significance have been identified as applicable:

1. For noise-sensitive receivers in the vicinity of the Project or Project Alternatives, a significant construction noise impact would occur when:
 - For residential properties (including hotels) when predicted daytime construction noise levels exceed 80 dBA $L_{eq}(\text{day})$, or nighttime construction levels exceed 70 dBA $L_{eq}(\text{night})$. OR;
 - For commercial properties (including parks, and offices and retail properties with exterior use areas) when predicted daytime or nighttime construction noise levels exceed 85 dBA L_{eq} . OR;
 - For all noise-sensitive land uses, when construction noise levels are predicted to exceed pre-project ambient noise level by more than 5 dBA at any time (as defined by daytime, evening and nighttime measured ambient levels).
2. For structures in the vicinity of the Project or Project Alternatives, a significant construction vibration impact would occur when:
 - For non high-rise residential structures, PPV is predicted to exceed 0.2 inches per second. OR;
 - For high-rise residential structures, or commercial properties (including hotels), PPV is predicted to exceed 0.3 inches per second.

3.10.3 Existing Conditions

Noise

The noise most commonly experienced in the RSA is produced by on-road automobiles, trucks, and buses. Vehicular noise varies with the volume, speed, and type of traffic. Slower traffic produces less noise than fast moving traffic. Trucks typically generate more noise than cars. Infrequent or intermittent noise is also associated with vehicles, including sirens, vehicle alarms, slamming of doors, garbage and construction vehicle or equipment activity, and honking of horns. A major source of noise within the RSA is vehicle traffic along Wilshire Boulevard, a major arterial roadway, located immediately adjacent and south of the Project site and Project Alternatives' sites. Other sources of noise within the RSA include construction truck traffic and aircraft fly-overs. Common stationary sources of noise include, but are not limited to, short-term construction activities; mechanical equipment such as heating, ventilation, and air conditioning units; and outdoor spaces (e.g., parks, activity on private properties).

Detailed noise measurements were conducted in the RSA for the Westside Purple Line Extension Final Supplemental Environmental Impact Statement and Section 4(f) Evaluation, which are utilized for the noise analysis in this section (Metro 2017). The existing noise data applicable to the Project and Project Alternatives are listed in Table 3.10-6. The locations of noise-sensitive receivers in the RSA, as well as the locations of the existing noise measurements are shown on Figure 3.10-1 above.

The existing noise data listed in Table 3.10-6 represent 14 long-term (24-hour) measurements and 4 short-term (1-hour) measurements, which were conducted near noise-sensitive receivers in the study area, such as hotels, parks, usable outdoor spaces, and single- and multi-family residential uses. The table presents the average of the measured daytime, evening, and nighttime noise levels (L_{eq}) for receivers in the RSA.

Vibration

Typically, existing vibration along roadways is generated by heavy trucks whose vibration level depends on vehicle type, weight, and pavement conditions. Heavy trucks normally operate on major streets. The nearest major arterial street is Wilshire Boulevard, located immediately adjacent to and south of the Project site and Project Alternatives' sites.

Sensitive Receptors

Sensitive receptors or receivers are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Noise-sensitive uses include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. Sensitive receptors within 500 feet of the Project and/or Project Alternatives' sites are listed in Table 3.10-7.

Table 3.10-6 Assumed Existing Ambient Noise Levels

Receiver ID (Key to Figure 3.10-2)	Land Use/Measurement Location	Measurement ID (Key to Figure 3.10-1)	Daytime L_{eq}	Evening L_{eq}	Night time L_{eq}
R-1A	Hotel – Montage Beverly Hills (Beverly Dr. West façade, with balconies)	LT-H	72	70	69
R-1B	Hotel – Montage Beverly Hills (Roof deck pool)	LT-I*	59	56	54
R-1C	Hotel – Montage Beverly Hills (Cañon Dr. East façade, entrance and balconies)	LT-K*	68	65	65
R-2	Park – Beverly Canon Gardens, Park (outdoor seating), N. Beverly Drive, 200 ft. north of Wilshire	LT-K*	68	65	65
R-3	Commercial – Sterling Plaza, (commercial building with roof-top terraces), Wilshire Blvd. between N. Beverly and N. Cañon	ST-3	74	72	71
R-4	Commercial – Citibank Building Plaza (outdoor plaza) Wilshire at Cañon	ST-3*	74	72	71
R-5	Hotel – Beverly Wilshire Hotel (exterior terrace, seating, balconies facing Wilshire)	ST-4	73	72	70
R-6	Hotel – AKA Beverly Hills, (hotel with exterior balconies and terraces)	LT-M	62	60	62
R-7	Park – Crescent Park (open park, seating walking path), N. Crescent, 200 ft. north of Wilshire	LT-K*	68	65	65
R-8	Residential – Wilshire Crescent, multi-family Residential, with Balconies, N. Crescent, 300 ft. north of Wilshire	LT-K*	68	65	65
R-9	Residential – Single-family homes, N. Rexford, starting 120 ft. north of Wilshire	LT-M*	62	60	62
R-10	Hotel – Sirtaj Hotel, (outdoor seating and restaurant), S. Reeves Dr., 200 ft. south of Wilshire	LT-J	58	56	52
R-11	Park – Reeves Park (outdoor seating, playground), S. Reeves Dr. 250 ft. south of Wilshire	LT-I	59	56	54

Table 3.10-6 Assumed Existing Ambient Noise Levels

Receiver ID (Key to Figure 3.10-2)	Land Use/Measurement Location	Measurement ID (Key to Figure 3.10-1)	Daytime L_{eq}	Evening L_{eq}	Night time L_{eq}
R-12	Residential – Single-family homes, S. Reeves Drive, starting 250 ft. south of Wilshire	LT-J	58	56	52
R-13	Residential – Single- and multi-family homes, S. Canon Dr., starting 200 ft. south of Wilshire	LT-L	61	61	57
R-14	Hotel – Sixty HD Hotel (roof-top pool and bar), Wilshire at S. Crescent Dr.	ST-1	76	74	72
R-15	Commercial – Shops on S. Beverly Dr. (sidewalk seating)	LT-J*	58	56	52
R-16	Commercial – Spago Restaurant (outdoor seating, second level) 176 N. Cañon Drive	LT-K	68	65	65

*=nearby or similar

Daytime is from 8:00 am to 6:00 pm, evening is from 6:00 pm to 9:00 pm, and nighttime is from 9:00 pm to 8:00 am.

Source: Metro 2017 and AECOM 2020

3.10.4 Impact Evaluation

Impact NOI-1. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to temporary and permanent noise as a result of the Purple Line Extension Project were evaluated in a separate environmental review process. Therefore, no impacts would occur related to the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies beyond those impacts previously analyzed in the Purple Line Extension EIS/EIR.

Table 3.10-7 Sensitive Receptors

Sensitive Receptor	Distance from Project Site (feet)	Distance from Cañon Dr.-Half Portal Alt. (feet)	Distance from Cañon Dr. Staging Yard Alt. (feet)
Hotel – Montage Beverly Hills (Beverly Dr. West façade, with balconies)	55	500	700
Hotel – Montage Beverly Hills (Roof deck pool)	150	400	585
Hotel – Montage Beverly Hills (Cañon Dr. East façade, entrance and balconies)	325	200	480
Park – Beverly Canon Gardens, Park (outdoor seating), N. Beverly Drive, 200 ft. north of Wilshire	100	400	600
Commercial – Sterling Plaza, (commercial building with roof-top terraces), Wilshire Blvd. between N. Beverly and N. Cañon	100	280	475
Commercial – Citibank Building Plaza (outdoor plaza) Wilshire at Cañon	350	50	250
Hotel – Beverly Wilshire Hotel (exterior terrace, seating, balconies facing Wilshire)	250	850	1,000
Hotel – AKA Beverly Hills, (hotel with exterior balconies and terraces)	750	250	30
Park – Crescent Park (open park, seating walking path), N. Crescent, 200 ft. north of Wilshire	900	450	270
Residential – Wilshire Crescent, multi-family Residential, with Balconies, N. Crescent, 300 ft. north of Wilshire	900	450	290
Residential – Single-family homes, N Rexford, starting 120 ft. north of Wilshire	1,100	600	450
Hotel – Sirtaj Hotel, (outdoor seating and restaurant), S. Reeves Dr., 200 ft. south of Wilshire	520	300	400
Park – Reeves Park (outdoor seating, playground), S. Reeves Dr. 250 ft. south of Wilshire	500	425	500
Residential – Single-family homes, S. Reeves Drive, starting 250 ft. south of Wilshire	550	350	425
Residential – Single- and multi-family homes, S Canon Dr., starting 200 ft. south of Wilshire	725	325	300
Hotel – Sixty HD Hotel (roof-top pool and bar), Wilshire at S. Crescent Dr.	950	450	250
Commercial – Shops on S. Beverly Dr. (sidewalk seating)	350	525	700
Commercial – Spago Restaurant (outdoor seating, second level) 176 N. Cañon Drive	500	65	230

Source: AECOM 2020

The Project (Beverly Drive)

Construction Impacts

Construction of the Project would last approximately 2.5 to 3.5 years. Construction activities would result in temporary increases in ambient noise levels in the RSA on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities would require the use of numerous types of noise-generating equipment including jackhammers, auger drill rigs, pumps, pneumatic tools, ventilation fans, and others.

Project noise levels were calculated using the RCNM methodology and reference levels as described in Section 3.10.2. The resulting predicted construction noise levels for the Project are presented in Table 3.10-8. The predicted noise levels are compared with the daytime, evening, and nighttime BHMC noise limits.

As shown in Table 3.10-8, the estimated on-site equipment noise levels associated with Project construction would exceed the existing ambient noise levels by more than 5 dBA at multiple sensitive receiver locations in the daytime, evening, and nighttime periods, respectively. The predicted noise levels presented in Table 3.10-8 also account for the up to 12-foot-tall noise barrier fencing that would surround the construction area, which is included as part of the Project. The impacted locations include the Maybourne Beverly Hills Hotel western façade balconies and roof-top area, the Beverly Cañon Gardens Park, and the outdoor sidewalk seating areas associated with the shops on South Beverly Drive. These locations are closest to the construction area and there is a lack of intervening structures. The implementation of the standard noise barrier fencing would not reduce noise levels below a level of significance. The daytime use of the jackhammers during demolition activities, the auger drill rig during excavation activities, and the pumps and pneumatic tools during structure construction were the primary contributors to daytime noise limit exceedances. The evening and nighttime use of ventilation fans during structure construction was the primary contributor to evening and nighttime noise limit exceedances.

The equipment listed above would be utilized intermittently during the various phases of Project construction over a 2.5- to 3.5-year timeframe. The noise increase would be temporary and intermittent but nonetheless would exceed the threshold, even with the presence of standard noise barrier fencing around the construction area. Measures listed in the MOA between Metro and the City would be implemented as applicable and feasible. Mitigation Measures NOI-A through NOI-I would be implemented to reduce construction-related noise impacts. Nonetheless, even after implementation of Mitigation Measures NOI-A through NOI-I,

Table 3.10-8 The Project Construction Noise – L_{eq} (dBA)

Receiver	Location	Daytime Const. Noise	Daytime Noise Limit	Evening Const. Noise	Evening Noise Limit	Nighttime Const. Noise	Nighttime Noise Limit
R-1A	Maybourne Beverly Hills Hotel (balconies on west façade)	<u>82</u>	77	<u>78</u>	75	<u>78</u>	74
R-1B	Maybourne Beverly Hills Hotel (roof deck pool)	<u>69</u>	64	<u>65</u>	61	<u>65</u>	59
R-1C	Maybourne Beverly Hills Hotel (balconies on east façade)	57	73	53	70	53	70
R-2	Beverly Canon Gardens Park	<u>77</u>	73	<u>73</u>	70	<u>73</u>	70
R-3	Sterling Plaza (roof-top terraces)	75	79	73	77	73	76
R-4	Citibank Building Plaza (outdoor plaza)	66	79	62	77	62	76
R-5	Beverly Wilshire Hotel (terraces, seating, balconies facing Wilshire Blvd.)	69	78	65	77	65	75
R-6	AKA Beverly Hills Hotel, (balconies and terraces)	55	67	51	65	51	67
R-7	Crescent Park	43	73	39	70	39	70
R-8	Wilshire Crescent, multi-family (balconies)	43	73	39	70	39	70
R-9	Single-family homes	41	67	37	65	37	67
R-10	Sirtaj Hotel (outdoor seating)	53	63	49	61	49	57
R-11	Reeves Park	53	64	49	61	49	59
R-12	Single-family homes	52	63	48	61	48	57
R-13	Single- and multi-family residential; S. Canon Dr., starting 200 ft. south of Wilshire Blvd.	45	66	41	66	41	62
R-14	Sixty HD Hotel (roof-top pool and bar)	58	81	54	79	54	77
R-15	Shops on S. Beverly Dr. (sidewalk seating)	<u>66</u>	63	<u>62</u>	61	<u>62</u>	57
R-16	Spago Restaurant (outdoor seating, second level) 176 N. Cañon Drive	52	73	48	70	48	70

Note: **Bold underlined text** denotes exceedance of adopted noise levels.

Source: AECOM 2020

construction equipment could still result in a 5 dBA increase over the ambient noise level. Therefore, impacts related to temporary construction equipment noise would be significant and unavoidable.

In addition to on-site construction activities, noise would be generated off-site by construction-related trucks and construction worker vehicles. For the Project, the primary access gate to the construction area for deliveries and hauling would be provided on Wilshire Boulevard and a secondary access gate would be provided on North Beverly Drive. The construction ingress route would occur east/northeast along Santa Monica Boulevard, then east to Wilshire Boulevard and the Project site. The construction egress route would travel west on Wilshire Boulevard where it would turn southwest onto Santa Monica Boulevard leading to the I-405 on-ramps. The preliminary maximum number of haul truck trips would occur during backfilling activities and is anticipated to result in up to approximately 19 haul truck trips per day. Construction worker trips would total approximately 16 trips per day and would likely occur within 1 hour during the start of a work day and 1 hour at the end of the work day. The incremental change in noise is not expected to exceed the ambient noise levels by more than 5 dBA considering the heavily travelled arterials and haul routes near the Project. The construction contractor would implement best management practices (BMPs) and applicable measures listed in the MOA between Metro and the City to reduce construction truck noise as feasible, including fitting the equipment with high grade engine exhaust silencers and engine casing sound insulation, reduced use of back-up alarms, and restrictions on tailgate slamming. Therefore, impacts related to temporary construction traffic noise would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

Construction of the Cañon Drive-Half Portal Alternative would last approximately 2.5 to 3.5 years. Construction activities would result in temporary increases in ambient noise levels in the RSA on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities will require the use of numerous types of noise-generating equipment including jackhammers, auger drill rigs, pumps, pneumatic tools, ventilation fans, and others.

Construction noise levels were calculated using the RCNM methodology and reference levels as described in Section 3.10.2. The resulting predicted construction noise levels for the Cañon Drive-Half Portal Alternative are presented in Table 3.10-9. The predicted noise levels are compared with the daytime, evening, and nighttime BHMC noise limits.

Table 3.10-9 Cañon Drive-Half Portal Alternative Construction Noise – L_{eq} (dBA)

Receiver	Location	Daytime Const. Noise	Daytime Noise Limit	Evening Const. Noise	Evening Noise Limit	Nighttime Const. Noise	Nighttime Noise Limit
R-1A	Maybourne Beverly Hills Hotel (balconies on west façade)	58	77	54	75	54	74
R-1B	Maybourne Beverly Hills Hotel (roof deck pool)	60	64	56	61	56	59
R-1C	Maybourne Beverly Hills Hotel (balconies on east façade)	66	73	62	70	62	70
R-2	Beverly Canon Gardens Park	60	73	56	70	56	70
R-3	Sterling Plaza (roof-top terraces)	68	79	64	77	64	76
R-4	Citibank Building Plaza (outdoor plaza)	<u>83</u>	79	<u>79</u>	77	<u>79</u>	76
R-5	Beverly Wilshire Hotel (terraces, seating, balconies facing Wilshire Blvd.)	59	78	55	77	55	75
R-6	AKA Beverly Hills Hotel, (balconies and terraces)	64	67	60	65	60	67
R-7	Crescent Park	54	73	50	70	50	70
R-8	Wilshire Crescent, multi-family (balconies)	54	73	50	70	50	70
R-9	Single-family homes	52	67	48	65	48	67
R-10	Sirtaj Hotel (outdoor seating)	58	63	54	61	54	57
R-11	Reeves Park	60	64	56	61	56	59
R-12	Single-family homes	56	63	52	61	52	57
R-13	Single- and multi-family residential; S Canon Dr., starting 200 ft. south of Wilshire Blvd.	64	66	60	66	60	62
R-14	Sixty HD Hotel (roof-top pool and bar)	64	81	60	79	60	77
R-15	Shops on S. Beverly Dr. (sidewalk seating)	53	63	49	61	49	57
R-16	Spago Restaurant (outdoor seating, second level) 176 N. Cañon Drive	<u>81</u>	73	<u>77</u>	70	<u>77</u>	70

Note: **Bold underlined text** denotes exceedance of adopted noise levels.

Source: AECOM 2020

As shown in Table 3.10-9, the estimated on-site equipment noise levels associated with the construction of the Cañon Drive-Half Portal Alternative would exceed the existing ambient noise levels by more than 5 dBA at two sensitive receiver locations in the daytime, evening, and nighttime periods, respectively. The predicted noise levels presented in Table 3.10-9 also account for the up to 12-foot-tall noise barrier fencing that would surround the construction area, which is included as part of this alternative. The impacted locations include the Citibank Building Plaza outdoor plaza area and the Spago Restaurant outdoor dining area. These locations are closest to the construction area and there is a lack of existing intervening structures. The implementation of the standard noise barrier fencing would not reduce noise levels below a level of significance. The daytime use of the jackhammers during demolition activities, the auger drill rig during excavation activities, and the pumps and pneumatic tools during structure construction were the primary contributors to daytime noise limit exceedances. The evening and nighttime use of ventilation fans during structure construction was the primary contributor to evening and nighttime noise limit exceedances.

The equipment listed above would be utilized intermittently during the various phases of the construction of the Cañon Drive-Half Portal Alternative over a 2.5- to 3.5-year timeframe. The noise increase would be temporary and intermittent but nonetheless would exceed the threshold, even with the presence of standard noise barrier fencing around the construction area. Measures listed in the MOA between Metro and the City would be implemented as applicable and feasible. Mitigation Measures NOI-A through NOI-I would be implemented to reduce construction-related noise impacts. Nonetheless, even after implementation of Mitigation Measures NOI-A through NOI-I, construction equipment could still result in a 5 dBA increase over the ambient noise level. Therefore, impacts related to temporary construction equipment noise would be significant and unavoidable.

In addition to on-site construction activities, noise would be generated off-site by construction-related trucks and construction worker vehicles. For the Cañon Drive-Half Portal Alternative, the primary access gate to the construction area for deliveries and hauling would be expected to occur from Wilshire Boulevard. While a gate is provided on North Cañon Drive, this is expected to be used as a secondary entry/exit. The construction ingress route would occur east/northeast along Santa Monica Boulevard, then east to Wilshire Boulevard and the Cañon Drive-Half Portal Alternative site. The construction egress route would travel west on Wilshire Boulevard where it would turn southwest onto Santa Monica Boulevard leading to the I-405 on-ramps. The preliminary maximum number of haul truck trips would occur during backfilling activities, and is anticipated to result in up to approximately 17 haul truck trips per day. Construction worker trips would total approximately 14 trips per day and would likely occur within 1 hour during the start of a work day and 1 hour at the end of the work day. The incremental change in noise is not expected to exceed the ambient noise levels by more than 5 dBA considering the heavily travelled arterials and haul routes near the Cañon Drive-Half Portal Alternative. The construction contractor would implement standard construction BMPs and applicable measures listed in the MOA between Metro and the City to reduce construction truck noise as feasible, including fitting the equipment with high grade engine exhaust silencers and engine casing sound insulation. Therefore, impacts related to temporary construction traffic noise would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

Construction of the Cañon Drive Staging Yard Alternative would last approximately 2.5 to 3.5 years. Construction activities would result in temporary increases in ambient noise levels in the

RSA on an intermittent basis. Noise levels would fluctuate depending on the construction phase, equipment type and duration of use, distance between the noise source and receptor, and presence or absence of noise attenuation barriers. Construction activities will require the use of numerous types of noise-generating equipment including jackhammers, auger drill rigs, pumps, pneumatic tools, ventilation fans, and others.

Construction noise levels were calculated using the RCNM methodology and reference levels as described in Section 3.10.2. The resulting predicted construction noise levels for the Cañon Drive Staging Yard Alternative are presented in Table 3.10-10.

**Table 3.10-10 Cañon Drive Staging Yard Alternative
Construction Noise – L_{eq} (dBA)**

Receiver	Location	Daytime Const. Noise	Daytime Noise Limit	Evening Const. Noise	Evening Noise Limit	Night- time Const. Noise	Night- time Noise Limit
R-1A	Maybourne Beverly Hills Hotel (balconies on west façade)	45	77	41	75	41	74
R-1B	Maybourne Beverly Hills Hotel (roof deck pool)	52	64	48	61	48	59
R-1C	Maybourne Beverly Hills Hotel (balconies on east façade)	59	73	54	70	54	70
R-2	Beverly Canon Gardens Park	57	73	53	70	53	70
R-3	Sterling Plaza (roof-top terraces)	59	79	55	77	55	76
R-4	Citibank Building Plaza (outdoor plaza)	64	79	60	77	60	76
R-5	Beverly Wilshire Hotel (terraces, seating, balconies facing Wilshire Blvd.)	57	78	53	77	53	75
R-6	AKA Beverly Hills Hotel, (balconies and terraces)	<u>88</u>	67	<u>84</u>	65	<u>84</u>	67

**Table 3.10-10 Cañon Drive Staging Yard Alternative
Construction Noise – L_{eq} (dBA)**

Receiver	Location	Daytime Const. Noise	Daytime Noise Limit	Evening Const. Noise	Evening Noise Limit	Night- time Const. Noise	Night- time Noise Limit
R-7	Crescent Park	64	73	59	70	59	70
R-8	Wilshire Crescent, multi- family (balconies)	58	73	54	70	54	70
R-9	Single-family homes	54	67	50	65	50	67
R-10	Sirtaj Hotel (outdoor seating)	55	63	51	61	51	57
R-11	Reeves Park	58	64	54	61	54	59
R-12	Single-family homes	55	63	51	61	51	57
R-13	Single- and multi-family residential; S Canon Dr., starting 200 ft. south of Wilshire Blvd.	<u>68</u>	66	64	66	<u>64</u>	62
R-14	Sixty HD Hotel (roof-top pool and bar)	69	81	65	79	65	77
R-15	Shops on S. Beverly Dr. (sidewalk seating)	45	63	41	61	41	57
R-16	Spago Restaurant (outdoor seating, second level) 176 N. Cañon Drive	54	73	50	70	50	70

Source: AECOM 2020

Note: **Bold underlined text** denotes exceedance of adopted noise levels.

As shown in Table 3.10-10, the estimated on-site equipment noise levels associated with the construction of the Cañon Drive Staging Yard Alternative would exceed the existing ambient noise levels by more than 5 dBA at two sensitive receiver locations. The predicted noise levels presented in Table 3.10-10 also account for the up to 12-foot-tall noise barrier fencing that would surround the construction area, which is included as part of this alternative. The AKA Beverly Hills Hotel balconies and terraces would be impacted during the daytime, evening, and

nighttime periods. In addition, the single- and multi-family residential uses on South Cañon Drive, approximately 200 feet south of Wilshire Boulevard, would be impacted during the daytime and nighttime periods. These locations are closest to the construction area and/or have a direct line-of-sight. The daytime use of the jackhammers during demolition activities, the auger drill rig during excavation activities, and the pumps and pneumatic tools during structure construction were the primary contributors to daytime noise limit exceedances. The evening and nighttime use of ventilation fans during structure construction was the primary contributor to evening and nighttime noise limit exceedances.

The equipment listed above would be utilized intermittently during the various phases of the construction of the Cañon Drive Staging Yard Alternative over a 2.5- to 3.5-year timeframe. The noise increase would be temporary and intermittent but nonetheless would exceed the threshold, even with the presence of standard noise barrier fencing around the construction area. Measures listed in the MOA between Metro and the City would be implemented as applicable and feasible. Mitigation Measures NOI-A through NOI-I would be implemented to reduce construction-related noise impacts. Nonetheless, even after implementation of Mitigation Measures NOI-A through NOI-I, construction equipment could still result in a 5 dBA increase over the ambient noise level. Therefore, impacts related to temporary construction equipment noise would be significant and unavoidable.

In addition to on-site construction activities, noise would be generated off-site by construction-related trucks and construction worker vehicles. For the Cañon Drive Staging Yard Alternative, the primary access gate to the construction area for deliveries and hauling would be expected to occur from Wilshire Boulevard. While a gate is provided on North Cañon Drive, this is expected to be used as a secondary entry/exit. The access gate provided on North Cañon Drive can only function as a secondary entry/exit due to space constraints within the yard. The construction ingress route would occur east/northeast along Santa Monica Boulevard, then east to Wilshire Boulevard and the proposed site. The construction egress route would travel west on Wilshire Boulevard where it would turn southwest onto Santa Monica Boulevard leading to the I-405 on-ramps. The preliminary maximum number of haul truck trips would occur during backfilling activities and is anticipated to result in up to approximately 13 haul truck trips per day. Construction worker trips would total approximately 11 trips per day and would likely occur within 1 hour during the start of a work day and 1 hour at the end of the work day. The incremental change in noise is not expected to exceed the ambient noise levels by more than 5 dBA considering the heavily travelled arterials and haul routes near the site. The construction contractor would implement standard construction BMPs and applicable measures listed in the MOA between Metro and the City to reduce construction truck noise as feasible, including fitting the equipment with high grade engine exhaust silencers and engine casing sound insulation. Therefore, impacts related to temporary construction traffic noise would be less than significant.

The Project and Project Alternatives

Operational Impacts

The Project and Project Alternatives would operate as a station portal on the north side of Wilshire Boulevard, and the use of construction equipment would not be required once the Project or Project Alternatives are operational. The operational components of the Project and Project Alternatives would not include any significant aboveground noise sources. Any noise generated by operational aboveground components such as entrances to stairwells, escalators, and elevators would be below existing ambient noise levels. In addition, the Project and Project Alternatives are not anticipated to generate additional vehicle traffic that would add substantially

to the ambient noise levels in the RSA. Therefore, impacts related to operational noise would be less than significant. Any subway-related noise occurring would not be attributable to the Project or Project Alternatives, but to other adjacent Metro operations that would occur regardless of whether the Project or Project Alternatives are constructed.

Impact NOI-2. Generate excessive ground-borne vibration or ground-borne noise levels.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts related to ground-borne vibration as a result of the Purple Line Extension Project were evaluated in a separate environmental review process. Therefore, no impacts would occur related to the generation of excessive ground-borne vibration or ground-borne noise levels beyond those previously analyzed in the Purple Line Extension EIS/EIR.

The Project and Project Alternatives

Construction Impacts

Construction activity can generate varying degrees of vibration, depending on the construction procedure and the construction equipment used. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receiver building(s). The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, and to damage at the highest levels.

Considering all the construction equipment assumed to be utilized during construction of the Project and Project Alternatives, the piece of construction equipment with the greatest reference PPV is the drill rig (caisson drilling) with a PPV of 0.089 inches per second at 25 feet (FTA 2018). The calculated ground-borne vibration levels resulting from the construction of the Project and Project Alternatives at the nearest structures are presented in Table 3.10-11.

Table 3.10-11 Predicted Ground-borne Vibration Levels

Project/Alternative	Nearest Structure	Distance (feet)	PPVref (in/sec)	PPV (in/sec)	Threshold (in/sec)	Impact?
The Project	Chase Bank Building	17	0.089	0.16	0.3	No
Cañon Drive-Half Portal Alternative	Citibank Building	15	0.089	0.19	0.3	No
Cañon Drive Staging Yard Alternative	AKA Hotel Garage	22	0.089	0.11	0.3	No

Source: AECOM 2020

As shown in Table 3.10-11, peak construction vibration levels for the construction of the Project and Project Alternatives would not exceed the 0.3 PPV vibration damage significance

thresholds. Therefore, construction impacts related to the generation of excessive ground-borne vibration would be less than significant.

Operational Impacts

The Project and Project Alternatives would operate as a station portal on the north side of Wilshire Boulevard, and the use of construction equipment would not be required. The operational components of the Project and Project Alternatives would not include any substantial sources of ground-borne vibration. Any ground-borne vibration generated by operational aboveground components such as entrances to stairwells, escalators, and elevators would not be clearly perceptible and is expected to be below the thresholds of significance. Therefore, impacts related to operational ground-borne vibration would be less than significant.

Impact NOI-3. For a project located within the vicinity of a private airstrip or 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.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to temporary and permanent noise as a result of the Purple Line Extension Project were evaluated in a separate environmental review process. Therefore, no impacts would occur related to exposure of people residing or working in the RSA to excessive noise levels from a public airport or private airport.

The Project and Project Alternatives

Construction and Operational Impacts

The nearest public airport is Santa Monica Municipal Airport 4 miles southwest of the Project and Project Alternatives. The Project or Project Alternatives, therefore, are not located within an airport land use plan or within the vicinity of an airport. Therefore, no construction or operational impacts would occur related to exposure of people residing or working in the RSA to excessive noise levels from a public airport or private airport.

3.10.5 Mitigation Measures

The Project and Project Alternatives

- NOI-A: Noise Barriers:** Temporary noise barriers shall be at least 12 feet in height and well-sealed around the construction site with overlapping sections to avoid gaps. Taller temporary noise barriers, up to 20 feet in height, shall be used in areas of predicted impacts, where possible.
- NOI-B: Equipment Maintenance:** Construction equipment shall be maintained to prevent noise due to worn or improperly maintained parts, and shall be

maintained with effective noise control devices (i.e., mufflers, lagging, and/or motor enclosures).

- NOI-C: Electrical Sources:** When possible, on-site electrical sources shall be used to power equipment rather than diesel generators.
- NOI-D: Sensitive Uses:** Construction staging areas shall be located away from sensitive uses, as feasible.
- NOI-E: Sound Curtains:** Flexible sound control curtains shall be placed around all drilling apparatuses and drill rigs.
- NOI-F: Noise Disturbance Coordinator:** A noise and vibration disturbance coordinator shall be established. The noise disturbance coordinator shall be responsible for responding to any local complaints about construction noise. The noise and vibration disturbance coordinator shall determine the cause of the complaint (e.g., starting too early, bad muffler, etc.) and shall be required to implement reasonable measures such that the complaint is resolved.
- NOI-G: Construction Notice:** The construction contractor shall provide a construction notice to residents within 1,000 feet of the construction site. The construction site notice shall include job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by the code or any discretionary approval for the site, and the City telephone number where violations can be reported. The notice will also include the phone number of the noise disturbance coordinator.
- NOI-H: Construction Phase Noticing:** The construction contractor shall provide construction update notices to residences within 1,000 feet of the construction site upon the initiation of each major construction phase (site preparation, drilling, etc.) and shall include the anticipated equipment to be used and duration of the construction phase.
- NOI-I: Construction Noise Monitoring:** As described in the MOA in place between the City and Metro, noise monitoring shall be implemented at the start of the construction phase and noise levels shall be limited to the following:
- No more than five (5) dBA above pre-existing ambient noise levels at all times at the property line of any residential and transient occupancy buildings evaluated on a fifteen (15) minute average noise level (L_{eq} 15 minute);
 - No more than two (2) instances within a one (1) hour period between the hours of 9:00 p.m. and 11:00 p.m. above eighty-five (85) dBA evaluated at an instantaneous maximum noise level (L_{max}) at the property line of any residential and transient occupancy buildings;
 - No more than one (1) instance within a two (2) hour period between the hours of 11:00 p.m. and 9:00 a.m. above eighty-five (85) dBA evaluated at an instantaneous maximum noise level (L_{max}) at the property line of any residential and transient occupancy buildings;

- No more than ten (10) instances within a one (1) week period between the hours of 9:00 p.m. and 9:00 a.m. above eighty-five (85) dBA evaluated at an instantaneous maximum noise level (L_{\max}) at the property line of any residential and transient occupancy buildings; or
- No more than two (2) instances within a one (1) week period between the hours of 9 p.m. and 9 a.m. above ninety-five (95) dBA evaluated at an instantaneous maximum noise level (L_{\max}) at the property line of any residential and transient occupancy buildings.

3.10.6 Impacts after Mitigation

The Project and Project Alternatives

Mitigation Measures NOI-A through NOI-I are feasible measures to control noise levels. According to local planning documents, such as the Los Angeles CEQA Thresholds Guide, engine mufflers (Mitigation Measure NOI-B) would reduce equipment noise levels by at least 3 dBA. The 3 dBA reduction from equipment engine mufflers could reduce daytime demolition noise impacts to below the threshold at the following noise-sensitive receivers: Maybourne Beverly Hills Hotel roof deck, the Beverly Cañon Gardens Park, the shops with sidewalk seating on Beverly Drive, and the Citibank Building outdoor plaza. The 3 dBA reduction could reduce daytime excavation noise impacts to below the threshold at the Spago Restaurant outdoor seating area. In addition, it could reduce daytime and nighttime structure construction noise impacts to below the threshold at the single- and multi-family homes on South Cañon Drive. However, the 3 dBA reduction would not reduce daytime and nighttime construction-related noise impacts to below the threshold at all impacted noise-sensitive receivers described in the analysis above.

The remaining Mitigation Measures NOI-A and NOI-C through NOI-I, while difficult to quantify, would assist in controlling construction noise. Construction noise impacts would be temporary and intermittent occurrences. Furthermore, implementation of Mitigation Measure NOI-F would establish a noise disturbance coordinator to handle any noise complaints and implement reasonable measures such that the complaint is resolved. Nonetheless, even after implementation of noise attenuation Mitigation Measures NOI-A through NOI-I, although there would be some decrease in noise levels, a 5 dBA increase over the ambient noise level would remain.

3.10.7 Cumulative Impacts

No Project Alternative

Related projects identified within approximately one-mile of the Project and Project Alternatives generally include commercial and residential construction or expansion. Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Section 2 of the Purple Line Extension Project and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. The No Project Alternative would not contribute to a cumulatively considerable impact related to noise and vibration.

The Project and Project Alternatives

Construction Impacts

The primary related construction projects within approximately one-mile of the Project and Project Alternatives that could potentially lead to cumulative noise impacts is the construction activity of the Wilshire/Rodeo Station as part of Section 2 of the Purple Line Extension Project, which is currently under construction. However, it is currently anticipated that major aboveground construction activities for the Wilshire/Rodeo Station would be completed prior to any construction activity for the proposed North Portal. In this case, there would be no significant overlap in the aboveground construction phases of the North Portal.

In addition, other future related projects in Beverly Hills were reviewed. Most of the other related projects were 900 feet or more away from the Project and Project Alternatives and would not have a direct line-of-sight to the Project site, Project Alternatives' sites, or proposed construction zones. However, one related project is a proposed modification to an existing commercial building at 100 North Crescent Drive approximately 350 feet east of the Cañon Drive Staging Yard Alternative, with the line-of-sight blocked by a solid row of buildings. This related project would construct an additional floor to the existing building, not an entirely new building, and the project's application is still under review by the City. In addition, as previously discussed, the Project and Project Alternatives would result in temporary significant and unavoidable construction noise impacts. Therefore, the Project and Project Alternatives would result in cumulatively considerable construction impacts related to noise.

Also, as previously discussed, the Project and Project Alternatives would not result in construction vibration impacts. Therefore, the Project and Project Alternatives would not have cumulatively considerable construction impacts related to vibration.

Operational Impacts

The Project and Project Alternatives would not result in significant noise and vibration impacts during operations as discussed in the analysis above. As such, the Project and Project Alternatives would not have cumulatively considerable operational impacts related to noise and vibration.

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3.11 Public Services

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to public services. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. The section describes the affected environment and analyzes the environmental consequences of the Project and Project Alternatives and, if applicable, provides mitigation measures.

3.12.3 Regulatory Setting

Federal

There are no federal fire, police, school, park, library, and emergency services regulations applicable to the Project and Project Alternatives.

State

California Occupational Safety and Health Administration

In accordance with Title 19 of the California Code of Regulations, the State Fire Marshal (Division 1) and the California Governor's Office of Emergency Services (Division 2) establish minimum standards for the prevention of fire and for the protection of life and property against fire, explosion, panic, and emergency response procedures.

2019 California Fire Code

The 2019 California Fire Code (Fire Code) (California Code of Regulations, Title 24, Part 9) contains regulations relating to construction, maintenance, and use of buildings and regulations consistent with nationally recognized and accepted practices for safeguarding life and property from the hazards of fire and explosion. Topics addressed in the Fire Code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and the surrounding premises. The Fire Code also contains specialized technical regulations related to fire and life safety. The Fire Code, with certain local amendments, was adopted by reference and codified in the Beverly Hills Municipal Code (BHMC), Title 9, Chapter 2: Fire Code.

California Health and Safety Code

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code. Regulations address building standards; fire protection and notification systems; fire protection devices, such as extinguishers and smoke alarms; and fire suppression training, among other topics.

Local

Beverly Hills Municipal Code

The BHMC includes Title 2, Administration, Personnel and Procedure, which establishes the Police Chief and Police Department as being responsible for the preservation of public peace; preservation and protection of City property; and duties as imposed by local, state, and federal law. The Fire Chief and Fire Department are responsible for providing fire protection to the City, enforcement of the Fire Code, and other duties and functions as imposed by local, state, and federal law.

Title 8, Parks Streets and other Public Property of the BHMC includes Article 1, General Parks and Recreational Facilities Provisions. This section of the BHMC identifies and designates public parks for public recreational use in the City and the types of recreational uses that are permissible and restricted or prohibited within parks, as well as hours of operation.

Title 9, Building and Property Health and Safety Regulations of the BHMC includes Chapter 2 Fire Code, which contains the Fire Code for the City. The City of Beverly Hills Fire Code (effective May 2017) defines laws that may be enforced by the Beverly Hills Fire Department to help safeguard life and property from fire, explosion, panic, or other dangerous conditions. The Beverly Hills Fire Code is discussed in more detail below.

City of Beverly Hills Fire Code

The City of Beverly Hills Fire Code is a component of the overall BHMC, Title 9, Chapter 2: Fire Code. The City of Beverly Hills Fire Code is the 2019 edition of the California Fire Code, including appendices B, BB, C, CC, D, F, and H, with certain local amendments.

The 2019 California Fire Code (California Code of Regulations, Title 24, Part 9) on which the Beverly Hills Fire Code is based, contains regulations relating to construction, maintenance, and use of buildings and regulations consistent with nationally recognized and accepted practices for safeguarding life and property from the hazards of fire and explosion. Topics addressed in the City of Beverly Hills Fire Code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions intended to protect and assist fire responders, industrial processes, and many other general and specialized fire-safety requirements for new and existing buildings and surrounding premises. The City of Beverly Hills Fire Code also contains specialized technical regulations related to fire and life safety, and information pertaining to administrative issues, such as the requirements for Hazardous Materials Release Response Plans and Inventory Statements, and technical requirements associated with the storage, management, and disposal of hazardous materials

The City of Beverly Hills General Plan

The City of Beverly Hills General Plan (the General Plan), was originally adopted in May 1977 and the most recent large-scale amendment and publication was in April 2010, with the last Housing Element adopted in 2013. The General Plan contains the City's over-arching goals, policies, and programs, and is intended to be usable by all members of the community including residents, businesses, developers, and visitors. The General Plan establishes land use designations for property within the City; identifies public improvements, including traffic, infrastructure, and community services that the City will implement to maintain and improve our community for future generations; and defines the City's economic sustainability aspirations,

among other things. The General Plan addresses the conservation and use of natural resources; addresses the protection of open space; and also seeks to limit potential damage from and ensure appropriate response to earthquakes, fires, and other emergencies.

The Open Space Element of the General Plan aims to direct the maintenance and conservation of natural resources, open space, and recreation and park lands in the City of Beverly Hills. The Open Space Element seeks to guide policy concerning the acquisition, control, development, and use of space; and to maintain a comprehensive inventory of the City's open space and recreation resources for future planning purposes.

The Safety Element of the General Plan provides goals and policies that focus on hazard mitigation, emergency response, and disaster recovery, and standards regarding fire prevention, fire protection, and emergency medical services. The Safety Element also provides goals and policies to guide the construction, maintenance, and operation of fire protection facilities in the City. Population density, land use, and traffic flow are also considered in evaluating the adequacy of fire protection services in a given location.

The Public Services Element of the General Plan contains specific goals, objectives, and policies to ensure a livable community environment and the adequate provision of public services and facilities for the community. This includes provisions to deliver coordinated police, fire, and emergency medical services; cultural services; educational services and facilities (in support of the Beverly Hills Unified School District [BHUSD]); human services; and support for the enhancement and development of library facilities, services, and programs that reflect changing community needs and industry trends.

City of Beverly Hills Local Mitigation Action Plan 2017-2022

The City of Beverly Hills Local Hazard Mitigation Action Plan (the Action Plan) forms part of the City of Beverly Hills General Plan Safety Element (City of Beverly Hills 2017). The purpose of the Action Plan is to promote sound public policy and programs designed to protect the public, critical facilities, infrastructure, private and public property, and the environment from natural and manmade hazards. This will be achieved by implementing the plan to guide the City towards creating and maintaining a safer, more resilient community.

Beverly Hills Unified School District

Public schools within Beverly Hills are administered by the BHUSD. The BHUSD consists of two transitional kindergarten through 5th grade elementary schools, one 6th grade through 8th grade middle school, and one 9th grade through 12th grade high school. An additional elementary school is also in the process of being reconstructed within the BHUSD (EI Rodeo School at Whittier Drive, Beverly Hills).

3.12.3 Methodology and CEQA Thresholds

Resource Study Area

The 2019 State CEQA Guidelines Section 15125(a) specify that an EIR must include a description of the physical environmental conditions in the vicinity of the project. State CEQA Guidelines Section 15126.2 states that in assessing the environmental impact of a proposed project, the lead agency should normally limit the examination of impacts to the existing physical conditions in the affected area as they exist at the time the notice of preparation is published.

The examination should also include a discussion of relevant resource topics within the affected area.

The resource study area (RSA) is the area in which all environmental investigations specific to public services are conducted to determine the resource characteristics and potential project impacts. The RSA for public services is defined for the Project and the Project Alternatives as the project footprint (i.e., the area needed to construct, operate, and maintain all permanent project features) plus a quarter-mile buffer. The RSAs for the Project, Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative are shown on Figure 3.11-1 (Public Services RSA Boundaries for the Project and Alternatives). The combined RSA refers to the combined total area occupied by the three RSAs.

Methodology

The analysis of public services consists of a summary of the regulatory framework that guides the decision-making process, a description of the existing conditions at the Project and Project Alternatives sites, anticipated impacts, mitigation measures, and level of significance after mitigation. Public services were evaluated in accordance with Appendix G of the State CEQA Guidelines.

The following impact analysis is based on a review of publicly available information related to fire protection and emergency medical services. Related literature and geographic information systems (GIS) data for the Project and Project Alternative sites were reviewed. Public services within the sites were evaluated in relation to the City of Beverly Hills General Plan and the BHMC (including the Beverly Hills Fire Code), as applicable.

CEQA Thresholds

An impact is considered significant if the project would:

1. 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;
 - b. Police protection;
 - c. Schools;
 - d. Parks;
 - e. Other public facilities.

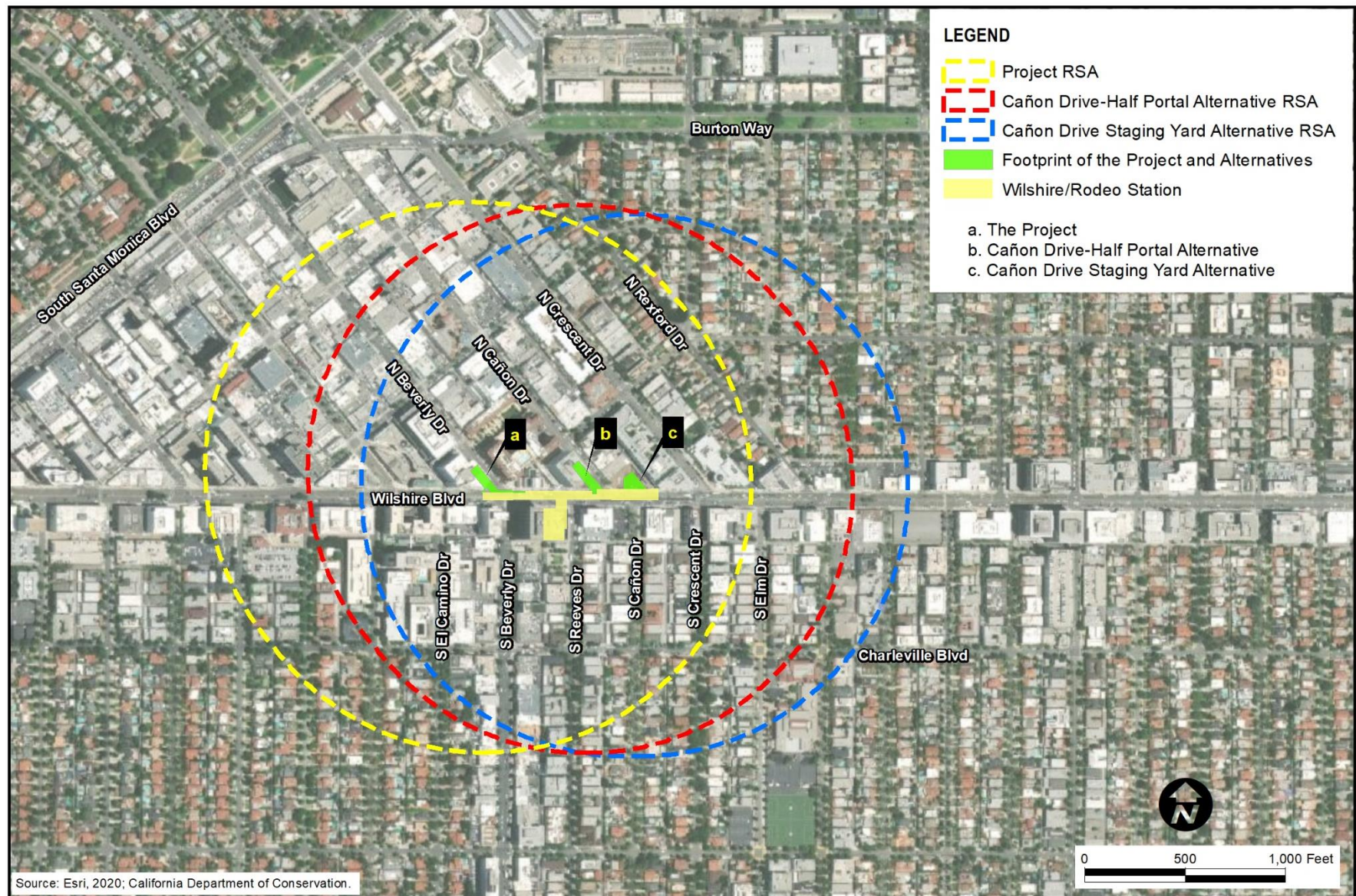


Figure 3.11-1 Public Services RSA Boundaries for the Project and Alternatives

3.12.3 Existing Conditions

This section provides the environmental setting for public services in the combined RSA and surrounding area.

Fire Protection

The Beverly Hills Fire Department (BHFD) provides fire protection and emergency services for the City of Beverly Hills. The BHFD provides services to approximately 34,000 residents and an estimated 250,000 daily visitors in the approximately 5.7-square-mile area that comprises the City of Beverly Hills (City of Beverly Hills 2019a). The BHFD is responsible for the protection of lives and property from the hazards of fire and natural disasters, and for providing emergency medical aid and assistance (City of Beverly Hills 2010; EIP Associates et al. 2005).

Beverly Hills is not intersected by any major freeways. However, major thoroughfares in the area include Wilshire Boulevard, North Santa Monica Boulevard, Olympic Boulevard, and Sunset Boulevard. In addition, the streets within the RSA are generally organized in a grid. These major thoroughfares and organized street planning typically allow for short emergency response times within the RSA (Citygate 2010).

The BHFD is organized into four divisions. The Emergency Response Services division provides rapid delivery of emergency services in response to any incident that has the potential to threaten life or property. The Community Risk Reduction division enforces local, state, and federal codes related to the safe occupancy of buildings and/or premises. The Emergency Medical Services division provides rapid delivery of advanced medical care by Firefighter Paramedics. The Fire Administration division provides planning, control, and management of all Fire Department activities and staff support for all divisions (City of Beverly Hills 2019a).

The BHFD operates three fire stations in the City of Beverly Hills:

- Station 1, the Department Headquarters, is at 445 North Rexford Drive, approximately 1,700 feet northeast of the Project, 1,850 feet north-east of the Cañon Drive-Half Portal Alternative, and 1,900 feet northeast of the Cañon Drive Staging Yard Alternative.
- Station 2, Coldwater Canyon, is at 1,100 Coldwater Canyon Drive, over 1.7 miles (approximately 9,000 feet) northwest of the Project and Project Alternatives.
- Station 3, Doheny Drive, is at 180 South Doheny Drive, approximately 3,100 feet southeast of the Project, 2,550 feet southeast of the Cañon Drive-Half Portal Alternative, and 2,500 feet southeast of the Cañon Drive Staging Yard Alternative.

All three stations are outside of the quarter-mile buffer RSA for the Project and Project Alternatives, with Station 1 the closest, followed by Station 3, then Station 2.

The BHFD has a built-in response matrix that defines a standardized response to each type of emergency the BHFD is responsible for. Per the matrix, a typical response for a first alarm structure fire would include four engine companies, one truck company, and a Battalion Chief. To further the response to emergencies, the BHFD has Automatic Mutual Aid agreements with the Los Angeles Fire Department and the Los Angeles County Fire Department (EIP Associates et al. 2005). Between 2014 and 2015, across approximately 72 percent of all incidents, the BHFD provided a response time of less than 4 minutes (BHFD 2016).

Police Protection

The Beverly Hills Police Department (BHPD) provides law enforcement services in Beverly Hills, including emergency and non-emergency police response, routine police patrols, investigative services, traffic enforcement, traffic investigation, and parking code enforcement (City of Beverly Hills 2019c). The BHPD Headquarters is the only police station in the city. The BHPD Headquarters is located at 464 North Rexford Drive, approximately 2,150 feet northeast of the Project, 2,300 feet northeast of the Cañon Drive-Half Portal Alternative, and 2,400 feet northeast of the Cañon Drive Staging Yard Alternative.

Currently, the BHPD employs an authorized total of 128 sworn officers and 66 civilian personnel (BHPD 2019). A 2005 report noted that the BHPD maintained a ratio of approximately 3.8 officers per 1,000 residents (EIP Associates et al. 2005). It is noted, however, that the BHPD does not utilize a standard personnel-to-population ratio due to the vast disparity of nighttime population to daytime population. In 2005, this disparity comprised approximately 35,700 residents at nighttime, to a daytime population of approximately 250,000 people, attributed mainly to employment and visitors (EIP Associates et al. 2005). BHPD maintains a response time of less than 3 minutes (BHPD 2020).

Schools

Public schools within the City are administered by the BHUSD, at 255 South Lasky Drive. The BHUSD consists of two transitional kindergarten through 5th grade elementary schools, one 6th grade through 8th grade middle school, and one 9th grade through 12th grade high school (BHUSD 2019).

Beverly Vista Middle School, at 200 South Elm Drive, is the only public school within the combined RSA. Beverly Vista Middle School serves 6th through 8th grade students and is approximately 1,150 feet southeast of the Cañon Drive-Half Portal Alternative and 1,000 feet southeast of the Cañon Drive Staging Yard Alternative. However, this middle school is approximately 1,550 feet southeast of the Project and outside of the Project RSA.

There are no private schools and no official daycare centers or preschools within the combined RSA.

Parks

The City parks system includes approximately 77 acres of developed parkland and 100 acres of open space areas that offer recreational, social, and cultural programs across 15 formal public park sites, as identified in the City's General Plan (City of Beverly Hills 2010). Two of these parks identified in the City's General Plan are located within the combined RSA:

- Crescent Drive Mini Park, at 142 North Crescent Drive, is approximately 0.16 acres (7,296 square feet) in size and is approximately 1,000 feet east of the Project, 490 feet east of the Cañon Drive-Half Portal Alternative, and 250 feet northeast of the Cañon Drive Staging Yard Alternative.
- Reeves Mini Park, at 125 South Reeves Drive, is 16,675 square feet in size and is approximately 420 feet southeast of the Project, 380 feet southwest of the Cañon Drive-Half Portal Alternative, and 510 feet southwest of the Cañon Drive Staging Yard Alternative.

In addition to the above two parks, Beverly Cañon Gardens is also situated within the combined RSA, at 241 North Cañon Drive. As the newest park within the City, it is not listed as a public park in the 2010 General Plan. Beverly Cañon Gardens is a green corridor that connects Beverly Drive and Cañon Drive, adjacent to the Montage Hotel. The park comprises approximately 3,000 square feet of landscaped garden and open space, and offers outdoor dining areas, water features, furnishings and architectural elements, and public walkways (City of Beverly Hills 2019b). Beverly Cañon Gardens is approximately 70 feet northeast of the Project, 350 feet northwest of the Cañon Drive-Half Portal Alternative, and 560 feet northwest of the Cañon Drive Staging Yard Alternative.

Other Public Facilities

Other public facilities can include public libraries, community centers, and public medical and healthcare facilities. No other public facilities are within the combined RSA. The closest facility is the Beverly Hills Public Library, at 444 North Rexford Drive. This library provides a number of services to the community, including but not limited to book lending, access to computers, online learning programs, and printing services. In addition, the library hosts free events for community members to participate in, including book club meetings, children's story times, and other special feature events such as book readings and presentations. Beverly Hills Public Library also provides facility rental to members of the community for community events, meetings, and presentations. Also located at 455 North Rexford Drive, the Beverly Hills City Hall provides facility rental to members of the community for community events, meetings, and presentations. Both the City Hall and Public Library are outside of the combined RSA.

3.11.4 Impact Evaluation

Thresholds Requiring No Further Analysis

It has been determined that the Project and Project Alternatives would not result in impacts related to schools and other public facilities. The Project and Project Alternatives would not include the construction or provision of housing, would not generate population growth, and would not include new residential units. As such, there would be no increase in the number of school-aged children residing in the combined RSA. The Project and Project Alternatives would not generate population growth that would affect other public facilities.

As such, the Project and Project Alternatives would result in no impacts related to schools and other public facilities, and these issues are not further evaluated.

Impact PUB-1. 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 Fire Protection.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to fire

protection were evaluated in Metro's previous separate environmental review process. Traffic control and management measures previously adopted by Metro for the construction of the Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still be implemented under the No Project Alternative, which would ensure fire protection response times are not impacted. As such, no impacts to fire protection would occur.

The Project (Beverly Drive)

Construction Impacts

No BHFD fire stations are within the defined RSA for the Project. However, should an incident or emergency occur at or near the Project, BHFD personnel and equipment would be dispatched from the nearest possible fire station. The nearest fire station to the Project is the BHFD Headquarters, approximately 1,700 feet northeast of the site. Depending on the nature of the emergency, additional assistance may be required, and personnel and equipment may also be dispatched from the next available fire station, which is Station 3, Doheny Drive, approximately 3,100 feet southeast of the Project.

The construction of the Project would typically take place within the preferred work hours prescribed by the City, which are Monday through Friday, 8:00 am to 6:00 pm. During the construction hours associated with the Project, the addition of workers within the RSA during these times would be negligible when compared to the approximate population of 35,700 people at night, and approximately 250,000 during the day (which includes workers and visitors). Additionally, the BHFD is cross-trained and equipped to respond to any type of emergency, including emergencies associated with incidents involving trenching and tunneling activities (Citygate 2010). As such, construction of the Project would not result in a substantial increase in demand for fire protection or affect BHFD service ratios.

Traffic impacts could occur during the construction of the Project as a result of the presence of construction vehicles and increased truck movements. Access disruptions may occur as a result of the Project, as North Beverly Drive would be closed for the duration of the construction between Wilshire Boulevard and approximately Beverly Cañon Gardens. A cul-de-sac would be created north of the site boundary, and a turning head (a t-shaped terminus that provides turning space for large vehicles) would be provided between the crosswalk and the north site boundary to facilitate traffic movements at this location. During construction, two lanes on Wilshire Boulevard would also be temporarily closed (i.e., one lane would be closed for loading/off-loading construction materials and another lane would be closed during pile installation and installation/removal of decking). Construction contractor coordination with BHFD would also occur to ensure that the closures would not impair implementation of emergency response.

Although the presence of construction vehicles and increased truck movements and road closures are expected to be temporary and intermittent, increased traffic congestion and access disruptions during construction as described above could affect BHFD emergency response times. For these reasons, it is possible that the construction of the Project could result in a potential temporary impact to fire protection services. Implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for Transportation) and would reduce the potential impacts to fire protection to less than significant.

Operational Impacts

The Project would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. The Project's pedestrian access would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard, resulting in safer accessibility. Additionally, the Project is not introducing any new housing units, or significantly increasing the permanent or visiting population. An increase in Metro Purple Line Extension ridership that would potentially induce growth is not expected to occur as a result of the implementation of the Project because a viable station portal would exist on the south side of Wilshire Boulevard. As such, a substantial increase in demand for fire protection or impacts to service ratios would not occur.

The Project would require removal of the majority of the southbound right-turn pocket on the west side of Beverly Drive, just north of Wilshire Boulevard. The proposed configuration of the Project would consist of one through lane and one shared through-right-turn lane on the southbound Beverly Drive approach. Following the completion of construction activities, all lanes on Wilshire Boulevard would be reopened for use. As permanent changes to the configuration of Beverly Drive would continue to allow for the passage of both northbound and southbound traffic, access disruptions to emergency services would be minor and BHFD emergency response times would not be significantly impacted during operation of the Project. Additionally, applicable BHFD requirements would be incorporated to ensure fire/life safety issues are adequately addressed as part of the design of the Project.

As such, impacts to fire protection services during operation of the Project would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

No BHFD fire stations are within the defined RSA for the Cañon Drive-Half Portal Alternative. However, should an incident or emergency occur at or near the Cañon Drive-Half Portal Alternative, BHFD personnel and equipment would be dispatched from the nearest fire station. The nearest fire station to the Cañon Drive-Half Portal Alternative is the BHFD Headquarters, approximately 1,850 feet northeast of the site. Depending on the nature of the emergency, additional assistance may be required, and personnel and equipment may also be dispatched from the next available fire station, which is Station 3, Doheny Drive, approximately 2,500 feet southeast of the Cañon Drive-Half Portal Alternative.

The construction of the Cañon Drive-Half Portal Alternative would typically take place within the preferred work hours prescribed by the City, which are Monday through Friday, 8:00 am to 6:00 pm. During the construction hours associated with the Cañon Drive-Half Portal Alternative, the addition of workers within the RSA during these times would be negligible when compared to the approximate population of 35,700 people at night, and approximately 250,000 during the day (which includes workers and visitors). Additionally, the BHFD is cross-trained and equipped to respond to any type of emergency, including emergencies associated with incidents involving trenching and tunneling activities (Citygate 2010). As such, the construction of the Cañon Drive-Half Portal Alternative would not result in a substantial increase in demand for fire protection or affect BHFD service ratios.

Traffic impacts could occur during the construction of the Cañon Drive-Half Portal Alternative as a result of the presence of construction vehicles and increased truck movements. Access disruptions may occur as a result of the Cañon Drive-Half Portal Alternative as North Cañon Drive would be closed for the duration of the construction between the Clifton Way intersection and Wilshire Boulevard. While emergency services would still be able to access the site from the north, the majority of the traffic movements to and from the site would occur via Wilshire Boulevard. Closure of one lane of Wilshire Boulevard would also be required for the duration of construction, and turns from Wilshire Boulevard onto North Cañon Drive would be prohibited; however, construction traffic and emergency services would be exempt from this restriction. During pile installation and installation and removal of the decking, a second lane of Wilshire Boulevard would be temporarily closed. This would reduce westbound traffic to one lane. Detour routes to the site and access for emergency vehicles would be available and exemptions to allow for emergency service access would be in place. Construction contractor coordination with BHFD would also occur to ensure that the closures would not impair implementation of emergency response.

Although the presence of construction vehicles and increased truck movements and road closures are expected to be temporary and intermittent, increased traffic congestion and access disruptions during construction as described above could affect BHFD emergency response times. For these reasons, it is possible that the construction of the Cañon Drive-Half Portal Alternative could result in a potential temporary impact to fire protection services. Implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for Transportation) and would reduce the potential impacts to fire protection to less than significant.

Operational Impacts

The Cañon Drive-Half Portal Alternative would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. The pedestrian access would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard, resulting in safer accessibility. Additionally, the Cañon Drive-Half Portal Alternative is not introducing any new housing units, or significantly increasing the permanent or visiting population. An increase in Metro Purple Line Extension ridership that would potentially induce growth is not expected to occur as a result of the implementation of the Cañon Drive-Half Portal Alternative because a viable station portal would exist on the south side of Wilshire Boulevard. As such, a substantially increased demand for fire protection or impacts to service ratios would not occur.

The Cañon Drive-Half Portal Alternative would permanently take any traffic lanes on Cañon Drive. Following the completion of construction activities, the lanes closed on Wilshire Boulevard and Cañon Drive would be reopened for use. Cañon Drive would continue to allow for the passage of both northbound and southbound traffic, access disruptions to emergency services would be minor and BHFD emergency response times would not be significantly impacted during operation of the Cañon Drive-Half Portal Alternative. Additionally, applicable BHFD requirements would be incorporated to ensure fire/life safety issues are adequately addressed as part of the design of the Cañon Drive-Half Portal Alternative. As such, the potential for the Cañon Drive-Half Portal Alternative to result in impacts to fire protection services during operation would be less than significant.

As such, impacts to fire protection services during operation of the Cañon Drive-Half Portal Alternative would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

No BHFD fire stations are within the defined RSA for the Cañon Drive Staging Yard Alternative. However, should an incident or emergency occur at or near this alternative, BHFD personnel and equipment would be dispatched from the nearest possible fire station. The nearest fire station to the Cañon Drive Staging Yard Alternative is the BHFD Headquarters, approximately 1,700 feet north east of the site. Depending on the nature of the emergency, additional assistance may be required, and personnel and equipment may also be dispatched from the next available fire station, which is Station 3, Doheny Drive, approximately 1,900 feet north east of the Cañon Drive Staging Yard Alternative.

The construction of the Cañon Drive Staging Yard Alternative would typically take place within the preferred work hours prescribed by the City, which are Monday through Friday, 8:00 am to 6:00 pm. During the construction hours associated with this alternative, the addition of workers within the RSA during these times would be negligible when compared to the approximate population of 35,700 people at night, and approximately 250,000 during the day (which includes workers and visitors). Additionally, the BHFD is cross-trained and equipped to respond to any type of emergency, including emergencies associated with incidents involving trenching and tunneling activities (Citygate 2010). As such, the construction of the Cañon Drive Staging Yard Alternative would not result in a substantial increase in demand for fire protection or affect BHFD service ratios.

Traffic impacts could occur during the construction of the Cañon Drive Staging Yard Alternative as a result of the presence of construction vehicles and increased truck movements. Access disruptions may occur as a result of this alternative, as closure of one lane of Wilshire Boulevard would be required during construction, and the site boundary would extend slightly into North Cañon Drive. Additionally, installation of the southern pile line would require temporary closure of a second lane of Wilshire Boulevard reducing westbound traffic to one lane. This work may be performed during nighttime hours and weekend closures to limit access and traffic disruptions. Construction contractor coordination with BHFD would also occur to ensure that the closures would not impair implementation of emergency response.

Although the presence of construction vehicles and increased truck movements and road closures are expected to be temporary and intermittent, increased traffic congestion and access disruptions during construction could affect BHFD emergency response times. For these reasons, it is possible that the construction of the Cañon Drive Staging Yard Alternative could result in a potential impact to fire protection services. Implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for Transportation) and would reduce the potential impacts to fire protection to less than significant.

Operational Impacts

The Cañon Drive Staging Yard Alternative would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. The pedestrian access would connect to the existing sidewalk network and allow

pedestrians to access the station from the north without crossing Wilshire Boulevard, resulting in safer accessibility. Additionally, the Cañon Drive Staging Yard Alternative would not be introducing any new housing units, or significantly increasing the permanent or visiting population. An increase in Metro Purple Line Extension ridership that would potentially induce growth is not expected to occur as a result of the implementation of the Cañon Drive Staging Yard Alternative because a viable station portal would exist on the south side of Wilshire Boulevard. As such, neither a substantially increased demand for fire protection nor impacts to service ratios would occur.

Following the completion of construction activities, roads would be reopened for use. As such, access disruptions would not occur and BHFD emergency response times would not be impacted during operation of the Cañon Drive Staging Yard Alternative.

Additionally, applicable BHFD requirements would be incorporated to ensure fire/life safety issues are adequately addressed as part of the design of the Cañon Drive Staging Yard Alternative.

As such, impacts to fire protection services during operation of the Cañon Drive Staging Yard Alternative would be less than significant.

Impact PUB-2. 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 Police Protection.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to police protection were evaluated in Metro's previous separate environmental review process. Traffic control and management measures previously adopted by Metro for the construction of the Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still be implemented under the No Project Alternative, which would ensure police protection response times are not impacted. As such, no impacts to police protection would occur.

The Project (Beverly Drive)

Construction Impacts

No BHPD police stations are within the defined RSA for the Project. However, should an incident or emergency occur at or near the Project, BHPD personnel would be dispatched from the BHPD Headquarters, 464 North Rexford Drive, approximately 2,150 feet north east of the Project.

The construction of the Project would typically take place within the preferred work hours prescribed by the City, which are Monday through Friday, 8:00 am to 6:00 pm. During the construction hours associated with the Project, the addition of workers within the RSA during these times would be negligible when compared to the approximate population of 35,700 people

at night, and approximately 250,000 during the day (which includes workers and visitors). The BHPD does not utilize a standard personnel-to-population ratio due to the vast disparity of nighttime population to daytime population. BHPD offers emergency and non-emergency protection services and would respond to emergencies associated with incidents involving trenching and tunneling activities. However, the construction of the Project would not result in a substantial increase in demand for police protection or affect BHPD service ratios.

Traffic impacts could occur during the construction of the Project as a result of the presence of construction vehicles and increased truck movements. Access disruptions may occur as a result of the Project, as North Beverly Drive would be closed for the duration of the construction between Wilshire Boulevard and approximately Beverly Cañon Gardens. A cul-de-sac would be created north of the site boundary, and a turning head would be provided between the crosswalk and the north site boundary to facilitate traffic movements at this location. During construction, two lanes on Wilshire Boulevard would also be temporarily closed (i.e., one lane would be closed for loading/off-loading construction materials and another lane would be closed during pile installation and installation/removal of decking). However, five lanes would remain open allowing for the continued operation of two westbound and two eastbound lanes plus the westbound left turn pocket onto South Beverly Drive. Detour routes to the site and access for emergency vehicles would be available adjacent to the Project, via Wilshire Boulevard. Construction contractor coordination with BHPD would also occur to ensure that the closures would not impair implementation of emergency response.

Although the presence of construction vehicles and increased truck movements and road closures are expected to be temporary and intermittent, increased traffic congestion and access disruptions during construction could affect BHPD emergency response times. For these reasons, the construction of the Project could result in a potential temporary impact to police protection services. Implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for Transportation) and would reduce the potential impacts to police protection to less than significant.

Operational Impacts

The Project would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. The pedestrian access would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard, resulting in safer accessibility. Additionally, the Project is not introducing any new housing units, or significantly increasing the permanent or visiting population. An increase in Metro Purple Line Extension ridership that would potentially induce growth is not expected to occur as a result of the implementation of the Project because a viable station portal would exist on the south side of Wilshire Boulevard. As such, a substantially increased demand for police protection or impacts to service ratios would not occur.

The Project would require removal of the majority of the southbound right-turn pocket on the west side of Beverly Drive, just north of Wilshire Boulevard. The proposed configuration of the Project would consist of one through lane and one shared through-right-turn lane on the southbound Beverly Drive approach. Following the completion of construction activities, Wilshire Road would be reopened for use. As the permanent changes to the configuration of Beverly Drive would continue to allow for the passage of both northbound and southbound traffic,

access disruptions to emergency services would be minor and BHPD emergency response times would not be significantly impacted during operation of the Project. Additionally, applicable BHPD requirements would be incorporated as part of the design of the Project.

As such, impacts to police protection services during operation of the Project would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

No BHPD police stations are within the defined RSA for the Cañon Drive-Half Portal Alternative. However, should an incident or emergency occur at or near the Cañon Drive-Half Portal Alternative, BHPD personnel would be dispatched from the BHPD Headquarters, at 464 North Rexford Drive, approximately 2,150 feet north east of the Cañon Drive-Half Portal Alternative.

The construction of the Cañon Drive-Half Portal Alternative would typically take place within the preferred work hours prescribed by the City, which are Monday through Friday, 8:00 am to 6:00 pm. During the construction hours associated with the Cañon Drive-Half Portal Alternative, the addition of workers within the RSA during these times would be negligible when compared to the approximate population of 35,700 people at night, and approximately 250,000 during the day (which includes workers and visitors). The BHPD does not utilize a standard personnel-to-population ratio due to the vast disparity of nighttime population to daytime population. BHPD offers emergency and non-emergency protection services and would respond to emergencies associated with incidents involving trenching and tunneling activities. However, the construction of the Cañon Drive-Half Portal Alternative would not result in a substantial increase in demand for police protection or affect BHPD service ratios.

Traffic impacts could occur during the construction of the Cañon Drive-Half Portal Alternative as a result of the presence of construction vehicles and increased truck movements. Access disruptions may occur as a result of the Cañon Drive-Half Portal Alternative as North Cañon Drive would be closed for the duration of the construction between the Clifton Way intersection and Wilshire Boulevard. While emergency services would still be able to access the site from the north, the majority of the traffic movements to and from the site would occur via Wilshire Boulevard. Closure of one lane of Wilshire Boulevard would also be required for the duration of construction, and turns from Wilshire Boulevard onto North Cañon Drive would be prohibited; however, construction traffic and emergency services would be exempt from this restriction. During pile installation and installation and removal of the decking, temporary closure of a second lane of Wilshire Boulevard would be undertaken. This would reduce westbound traffic to one lane. Detour routes to the site and access for emergency vehicles would be available and exemptions to allow for emergency service access would be in place. Construction contractor coordination with BHPD would also occur to ensure that the closures would not impair implementation of emergency response.

Although the presence of construction vehicles and increased truck movements and road closures are expected to be temporary and intermittent, increased traffic congestion and access disruptions during construction as described above could affect BHPD emergency response times. For these reasons, it is possible that the construction of the Cañon Drive-Half Portal Alternative could result in a potential temporary impact to police protection services. Implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for

Transportation) and would reduce the potential impacts to police protection to less than significant.

Operational Impacts

The Cañon Drive-Half Portal Alternative would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. The pedestrian access would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard, resulting in safer accessibility. Additionally, the Cañon Drive-Half Portal Alternative is not introducing any new housing units, or significantly increasing the permanent or visiting population. An increase in Metro Purple Line Extension ridership that would potentially induce growth is not expected to occur as a result of the implementation of the Cañon Drive-Half Portal Alternative because a viable station portal would exist on the south side of Wilshire Boulevard. As such, a substantial increase in demand for police protection or impacts to service ratios would not occur.

The Cañon Drive-Half Portal Alternative would not require permanent removal of traffic lanes. Therefore, the two southbound right-turn and left-turn travel lanes would be maintained, as well as two northbound travel lanes. Following the completion of construction activities, the lanes closed on Wilshire Boulevard would be reopened for use. Cañon Drive would continue to allow for the passage of both northbound and southbound traffic, access disruptions to emergency services would be minor and BHPD emergency response times would not be significantly impacted during operation of the Cañon Drive-Half Portal Alternative. Additionally, applicable BHPD requirements would be incorporated as part of the design of the Cañon Drive-Half Portal Alternative. As such, the potential for the Cañon Drive-Half Portal Alternative to result in impacts to police protection services during operation would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

No BHPD police stations are within the defined RSA for the Cañon Drive Staging Yard Alternative. However, should an incident or emergency occur at or near this alternative, BHPD personnel would be dispatched from the BHPD Headquarters, 464 North Rexford Drive, approximately 2,400 feet north east of the Cañon Drive Staging Yard Alternative.

The construction of the Cañon Drive Staging Yard Alternative would typically take place within the preferred work hours prescribed by the City, which are Monday through Friday, 8:00 am to 6:00 pm. During the construction hours associated with this alternative, the addition of workers within the RSA during these times would be negligible when compared to the approximate population of 35,700 people at night, and approximately 250,000 during the day (which includes workers and visitors). The BHPD does not utilize a standard personnel-to-population ratio due to the vast disparity of nighttime population to daytime population. BHPD offers emergency and non-emergency protection services and would respond to emergencies associated with incidents involving trenching and tunneling activities. However, the construction of the Cañon Drive Staging Yard Alternative would not result in a substantial increase in demand for police protection or affect BHPD service ratios.

Traffic impacts could occur during the construction of the Cañon Drive Staging Yard Alternative as a result of the presence of construction vehicles and increased truck movements. Access disruptions may occur as a result of this alternative, as closure of one lane of Wilshire Boulevard would be required during construction, and the site boundary would extend slightly into North

Cañon Drive. Additionally, installation of the southern pile line would require temporary closure of a second lane of Wilshire Boulevard, reducing westbound traffic to one lane. This work may be performed during nighttime hours and weekend closures to limit access and traffic disruptions. Construction contractor coordination with BHPD would also occur to ensure that the closures would not impair implementation of emergency response.

Although the presence of construction vehicles and increased truck movements and road closures are expected to be temporary and intermittent, increased traffic congestion and access disruptions during construction could affect BHPD emergency response times. For these reasons, it is possible that the construction of the Cañon Drive Staging Yard Alternative could result in a potential impact to police protection services. Implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for Transportation) and would reduce the potential impacts to police protection to less than significant.

Operational Impacts

The Cañon Drive Staging Yard Alternative would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. The pedestrian access would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard, resulting in safer accessibility. Additionally, this alternative would not introduce any new housing units, or significantly increase the permanent or visiting population. An increase in Metro Purple Line Extension ridership that would potentially induce growth is not expected to occur as a result of the implementation of the Cañon Drive Staging Yard Alternative because a viable station portal would exist on the south side of Wilshire Boulevard. As such, a substantial increase in demand for police protection or impacts to service ratios would not occur.

Following the completion of construction activities, roads would be reopened for use. As such, access disruptions would not occur and BHPD emergency response times would not be impacted during operation of the Cañon Drive Staging Yard Alternative.

Additionally, applicable BHPD requirements would be incorporated as part of the design of the Cañon Drive Staging Yard Alternative.

As such, impacts to police protection services during operation of the Cañon Drive Staging Yard Alternative would be less than significant.

Impact PUB-3. 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 Parks.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to parks were

evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process.

The Project (Beverly Drive)

Construction Impacts

Relative to the Project, Crescent Drive Mini Park is approximately 1,000 feet to the east, Reeves Mini Park is approximately 420 feet southeast, and Beverly Cañon Gardens is approximately 70 feet northeast, on the opposite side of Beverly Drive. Due to its proximity to the Project, Beverly Cañon Gardens is considered the most likely to experience temporary impacts as a result of the construction of the Project. Crescent Drive Mini Park and Reeves Mini Park are both more than 400 feet from the Project; therefore, these areas would not likely experience construction impacts.

While road closures and alterations to pedestrian access would occur during construction of the Project, access to Beverly Cañon Gardens would be maintained. Beverly Cañon Gardens can also be accessed via an alternative entrance on Cañon Drive. The Project is not expected to generate an increase in population during construction; therefore, construction of this Alternative would not result in increased use of existing neighborhood or regional parks. Additionally, no construction activities or use of the park for construction laydown or storage would occur. As such, no deterioration of the park would result from construction.

The Project would not impact parks in the RSA or require land from any publicly-owned, publicly-accessible parks or recreation areas. As such, impacts related to parks during construction of the Project would be less than significant.

Operational Impacts

The operation of the Project would not result in any road or pedestrian closures that would limit public access to parks within the RSA. Additionally, no use of any park for the operation of the Project would be required.

The Project would not generate an increase in population during operation; therefore, operation of the Alternative would not result in increased use of existing neighborhood or regional parks. It is not expected that parks or recreational facilities would be overburdened or subject to increased use that would accelerate physical deterioration of park facilities. No deterioration of these facilities would result from operation and impacts associated with the provision of new or physically altered parks would not occur.

As such, impacts related to parks during operation of the Project would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

Relative to the Cañon Drive-Half Portal Alternative, Crescent Drive Mini Park is approximately 490 feet to the east, Reeves Mini Park is approximately 380 feet south west, and Beverly Cañon Gardens is approximately 350 feet northwest.

While road closures and alterations to pedestrian access would occur during construction of the Cañon Drive-Half Portal Alternative, access to all parks within the RSA would be maintained.

The Cañon Drive-Half Portal Alternative is not expected to generate an increase in population during construction; therefore, construction of this Alternative would not result in increased use of existing neighborhood or regional parks. Additionally, no construction activities or use of the park for construction laydown or storage would occur. As such, no deterioration of the park would result from construction.

The Cañon Drive-Half Portal Alternative would not impact parks in the RSA or require land from any publicly-owned, publicly-accessible parks or recreation areas. As such, impacts related to parks during construction of the Cañon Drive-Half Portal Alternative would be less than significant.

Operational Impacts

The operation of the Cañon Drive-Half Portal Alternative would not result in any road or pedestrian closures that would limit public access to parks within the RSA. Additionally, no use of any park for the operation of the Cañon Drive-Half Portal Alternative would be required.

The Cañon Drive-Half Portal Alternative would not generate an increase in population during operation; therefore, operation of the Alternative would not result in increased use of existing neighborhood or regional parks. It is not expected that parks or recreational facilities would be overburdened or subject to increased use that would accelerate physical deterioration of park facilities. No deterioration of these facilities would result from operation and impacts associated with the provision of new or physically altered parks would not occur. As such, impacts related to parks during operation of the Cañon Drive-Half Portal Alternative would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

Relative to the Cañon Drive Staging Yard Alternative, Crescent Drive Mini Park is approximately 250 feet northeast, Reeves Mini Park is approximately 510 feet southwest, and Beverly Cañon Gardens is approximately 560 feet northwest.

While road closures and alterations to pedestrian access would occur during construction of the Cañon Drive Staging Yard Alternative, access to all parks within the RSA would be maintained. The Cañon Drive Staging Yard Alternative is not expected to generate an increase in population during construction; therefore, construction of this alternative would not result in increased use of existing neighborhood or regional parks. Additionally, no construction activities or use of the park for construction laydown or storage would occur. As such, no deterioration of the park would result from construction.

The Cañon Drive Staging Yard Alternative would not impact parks in the RSA or require land from any publicly-owned, publicly-accessible parks or recreation areas. As such, impacts related to parks during construction of the Cañon Drive Staging Yard Alternative would be less than significant.

Operational Impacts

The operation of the Cañon Drive Staging Yard Alternative would not result in any road or pedestrian closures that would limit public access to parks within the RSA. Additionally, no use of any park for the operation of the Cañon Drive Staging Yard Alternative would be required.

The Cañon Drive Staging Yard Alternative would not generate an increase in population during operation; therefore, operation of this alternative would not result in increased use of existing neighborhood or regional parks. It is not expected that parks or recreational facilities would be overburdened or subject to increased use that would accelerate physical deterioration of park facilities. No deterioration of these facilities would result from operation and impacts associated with the provision of new or physically altered parks would not occur. As such, impacts related to parks during operation of the Cañon Drive Staging Yard Alternative would be less than significant.

3.11.5 Mitigation Measures

Implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for Transportation) and would ensure that potential impacts to fire and police protection are less than significant for the Project and Project Alternatives.

3.11.6 Impacts after Mitigation

Upon implementation of Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D (described in Section 3.12.5, Mitigation Measures for Transportation), significant impacts would be reduced to a level less than significant.

3.11.7 Cumulative Impacts

No Project Alternative

Related projects identified within approximately 1 mile of the Project generally include commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning public services.

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to public services were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulative impact related to public services.

The Project and Project Alternatives

Construction Impacts

Related projects identified within approximately 1 mile of the Project generally include commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning public services.

Similar to construction of the Project and Project Alternatives, construction of the related projects could potentially result in traffic and access impacts that could impact public services. However, the Project and Project Alternatives would implement Mitigation Measures TRA-A, TRA-B, TRA-C, and TRA-D which would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (refer to Section 3.12.5, Mitigation Measures for Transportation) to ensure that impacts related to public services would be less than significant.

Additionally, impacts for the Project and Project Alternatives would be localized and minimized, thus, cumulative impacts related to public services would be less than significant.

Operational Impacts

Related projects identified within approximately 1 mile of the Project generally include commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning public services.

While related projects identified could increase local population, which could result in an increased demand and use of existing public services, the Project and Project Alternatives would not generate an increase in population. As such, the Project and Project Alternatives would not increase demand on public services. Therefore, it is not expected that the Project and Project Alternatives would contribute to cumulative impacts related to public services during operation.

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3.12 Transportation

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to transportation. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. The section describes the affected environment and analyzes the environmental consequences of the Project and Project Alternatives and, if applicable, provides mitigation measures.

3.12.1 Regulatory Setting

This section summarizes state, regional, and local regulatory framework that serve as the foundation for evaluating transportation impacts under CEQA. In particular, the Project and Project Alternatives are evaluated to determine whether they would create any impacts or conflict with any previously adopted policies, plans, or projects.

California Environmental Quality Act

CEQA generally requires state and local government agencies to inform decision makers and the public about the potential environmental impacts of proposed projects, and to reduce those environmental impacts to the extent feasible. CEQA Section 15064.3 describes specific considerations for determining a project's transportation impacts. Generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. For the purposes of this section, "vehicle miles traveled" refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the project on transit and non-motorized travel (CEQA 2019). The criteria used to analyze transportation impacts are included in Section 3.12.2. Potential CEQA impacts for the Project and Project Alternatives are summarized in Section 3.12.4.

California Senate Bill 743

Senate Bill 743 (SB 743) directs the Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines by July 1, 2014 to establish new criteria for determining the significance of transportation impacts and define alternative metrics for traffic LOS. On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changed transportation impact analysis as part of CEQA compliance. These changes include elimination of auto delay, level of service (LOS), and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts for transportation projects in California.

In 2016, OPR released the Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA. Of particular relevance was the updated text of the new Section 15064.3 that relates to the determination of the significance of transportation impacts, alternatives, and mitigation measures. More information on the determination of the significance of impacts is included below in Section 3.12.2.

California Assembly Bill 32 and Senate Bill 375

Assembly Bill 32 (AB 32), also known as the California Global Warming Solutions Act of 2006, is California's major initiative for reducing greenhouse gas (GHG) emissions. AB 32 requires California to reduce its GHG emissions to 1990 levels by 2020, a reduction of approximately 15 percent below emissions expected under a "business as usual" scenario.

As stated in AB 32, the California Air Resources Board (CARB) must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions. The full implementation of AB 32 will help mitigate risks associated with climate change, while improving energy efficiency, expanding the use of renewable energy resources, cleaner transportation, and reducing waste (CARB 2018).

Signed in 2008, Senate Bill 375 (SB 375) directs CARB to develop regional GHG emission reduction targets to be achieved by passenger vehicles by 2020 and 2035. SB 375 also directs each of California's major metropolitan planning organizations (MPOs) to prepare a sustainable communities strategy (SCS) that identifies a growth strategy to meet emissions targets, to be included in each MPOs regional transportation plan (RTP).

In 2010, CARB adopted regional targets for reducing GHG emissions by 2020 and 2035, using 2005 as a base year. The Southern California Association of Governments (SCAG) was assigned targets of an eight percent reduction in GHGs from transportation sources by 2020 and a 13 percent reduction in GHGs from transportation sources by 2035.

Southern California Association of Governments (SCAG) 2016-2040 Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS) and Regional Transportation Improvement Program (RTIP)

SCAG adopted the *2016-2040 RTP/SCS* in April 2016. The *RTP/SCS* is a planning document required under state and federal statute that encompasses the SCAG region, including six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The *RTP/SCS* forecasts long-term transportation demands and identifies policies, actions, and funding sources to accommodate these demands. The *RTP/SCS* consists of the construction of new transportation facilities, transportation systems management strategies, transportation demand management and land use strategies. The *RTIP*, also prepared by SCAG based on the *RTP/SCS*, lists all of the regional funded/programmed improvements over a six-year period.

LA Metro First Last Mile Strategic Plan

The *LA Metro First Last Mile Strategic Plan* (Metro, SCAG 2014) outlines an approach for identifying barriers and planning for/implementing improvements for connecting transit services to nearby trip origins (e.g. an individuals' home) and destinations (e.g. an individuals' place of employment). Examples of first/last mile improvements include but are not limited to: pedestrian and bicycle infrastructure, signage and wayfinding, and shared use services (e.g. car share). The Plan developed what is known as "The Pathway," a proposed countywide transit access network designed to enhance transit accessibility. The Pathway is a series of active transportation improvements that connect to and from Metro Rail and Bus Rapid Transit stations.

The City of Beverly Hills worked with Metro to develop the *Wilshire/Rodeo Station Pathway Plan* for the Wilshire/Rodeo Station. The Plan notes that Wilshire Boulevard would benefit from numerous first/last mile improvements, including bus stop enhancements, high-visibility

crosswalks, street furniture, and street trees where needed. The Plan identifies a series of bicycle improvements that will help facilitate station access, such as intersection treatments to create a bicycle-friendly environment at the intersection of Wilshire Boulevard and Cañon Drive. The document also identifies the following potential bicycle facilities near the Project and Project Alternatives:

- Beverly Drive: Class II Bike Lane
- North Cañon Drive: Class III (“Sharrows”)
- South Reeves Drive: Class III (“Sharrows”)

The City of Beverly Hills is currently developing the *Wilshire Boulevard – La Cienega Boulevard Streetscape Master Plan*. The Plan would develop streetscape design standards and incorporate concepts from the *City of Beverly Hills Draft Complete Streets Plan (City of Beverly Hills, 2019)* to show placement of transportation enhancements associated with streetscape improvements along Wilshire Boulevard near the future Wilshire/Rodeo station.

Los Angeles County Bicycle Master Plan

The *County of Los Angeles Bicycle Master Plan* (County of Los Angeles Public Works, 2012) seeks to improve bicycle mobility and encourage bicycle ridership within Los Angeles County. The Plan does not identify any planned bicycle facilities near the Project and Project Alternatives sites. However, since the adoption of the Plan, Class II bike lanes have been added along North Santa Monica Boulevard and a Class III facility (“sharrows”) has been added along North Crescent Drive north of Wilshire Boulevard. Several other planned facilities are identified as part of the *City of Beverly Hills Draft Complete Streets Plan* (City of Beverly Hills 2019) discussed below.

City of Beverly Hills General Plan – Circulation Element

The *City of Beverly Hills General Plan Circulation Element* (City of Beverly Hills, 2010) has two overarching objectives: that the neighborhoods of Beverly Hills should be preserved and enhanced, including limiting negative effects caused by vehicles. Secondly, vehicles should move into, out of, or through Beverly Hills as expeditiously as possible. The Circulation Element identifies the following goals that are relevant to this EIR:

- **CIR 1 Circulation System:** Provide a safe and efficient roadway circulation system within the City.
- **CIR 2 Transit:** Development of a safe, comprehensive, and integrated transit system that serves as an essential component of a multi-modal mobility system within the City.
- **CIR 3 Neighborhood Traffic Management:** An improved community character and quality of life in City neighborhoods through the implementation of traffic management techniques.
- **CIR 6 Transportation Demand Management (TDM):** A reduction in single-occupant motor vehicle travel in the City through Transportation Demand Management (TDM) that ensures efficiency of the existing transportation network and promotes the movement of people instead of personal automobiles.
- **CIR 7 Pedestrians:** A safe and comfortable pedestrian environment that results in walking as a desirable travel choice, particularly for short trips, within the City.

- **CIR 8 Bikeways.** An integrated, complete, and safe bicycle system to encourage bicycling within the City.
- **CIR 11 Role of the Alleys:** With the major exception of the area east of Robertson Boulevard and parts of the area north of Sunset Boulevard, the City is fully served by alleys which traverse midblock and provide rear service to the City's residential, commercial and industrial parcels. These alleys play an important and complex role in the structure of the City.

City of Beverly Hills Draft Complete Streets Plan

The *City of Beverly Hills Draft Complete Streets Plan* (City of Beverly Hills, 2019) creates a blueprint for transportation improvements that balance the needs of all road users: bicyclists, pedestrians, transit riders, and motorists. The goal of the Plan is to provide more options for people to choose the mode that best works for their trip type, and a network of streets where individual modes will be prioritized.

The Plan identifies the following goals that are relevant to this EIR:

- Goal B1: Provide a Safe and Efficient Bicycle Circulation System Within the City
- Goal B2: Provide a Holistic and Connected Bicycle Network
- Goal B3: Expand Bike Parking
- Goal B4: Support and Encourage Bicycle Transportation
- Goal P1: Improve Pedestrian Safety
- Goal P2: Make Walking a Desirable Travel Choice
- Goal P3: Enhance Sidewalks as Public Spaces
- Goal T1: Provide First/Last Mile Connections
- Goal T2: Improve the Rider Experience
- Goal T3: Increase Transit Ridership
- Goal V1: Reduce Traffic Congestion
- Goal V2: Harness the Power of Data and Technology
- Goal V3: Support Safe, Complete, Livable, Sustainable, and Quality Neighborhoods

The Plan identifies a series of bicycle improvements that will help facilitate access to the Wilshire/Rodeo Station.

The Plan also identifies Wilshire Boulevard and Clifton Way east of North Cañon Drive as pedestrian corridors and thus recommends a series of improvements designed to enhance the overall pedestrian experience. Potential improvements could include new and upgraded sidewalks, tightened curb radii to slow vehicle speeds, and mid-block crossings, among others.

The Plan identifies Wilshire Boulevard and Beverly Drive as part of the City's proposed Transit Enhanced Network. Bus stop enhancements – such as shelter, seating, lighting, trash/recycling bins, poles/signs with route information and schedules, a system map (or link to one), a paved boarding area, and ADA-compliant pedestrian connections –are identified at the intersection of Wilshire Boulevard and Beverly Drive.

Connect Beverly Hills

The City of Beverly Hills is currently working on the Connect Beverly Hills project, which would develop a streetscape plan and design standards for Wilshire and La Cienega Boulevards, and

incorporate concepts from the *City of Beverly Hills Draft Complete Streets Plan (City of Beverly Hills, 2019)* to show placement of transportation enhancements associated with streetscape improvements along Wilshire Boulevard near the future Wilshire/Rodeo station.

3.12.2 Methodology and CEQA Thresholds

Resource Study Area

The Project and Project Alternatives being evaluated for the North Portal are located north of Wilshire Boulevard and adjacent to the existing footprint of the Wilshire/Rodeo Station, which is part of the Purple Line Extension Project. The Wilshire/Rodeo Station is planned to be located immediately beneath Wilshire Boulevard from approximately Beverly Drive to the alley (adjacent to Crescent Drive) between Cañon and Crescent Drives. The main entrance of the Wilshire/Rodeo Station will be located on the southwest corner of Wilshire Boulevard and Reeves Drive.

The study area for the transportation analysis is bound by Beverly Drive to the west, Canon Drive to the east, Clifton Way to the north, and Wilshire Boulevard to the south. Station access for the roadways and intersections adjacent to the North Portal were evaluated as part of the transportation impact analysis. The study intersections reflect locations that may require lane modifications due to the public right-of-way (ROW) needed to construct the portal or may require improvements to provide pedestrian access to the station. No additional intersections were analyzed because the installation of the North Portal is not expected to increase vehicle travel flows or increase VMT in the study area. The three intersections studied are described below and shown in Figure 3.12-1.

- **Wilshire Boulevard/Beverly Drive** (signalized)
The Project would be located on the west side of Beverly Drive north of Wilshire Boulevard. Implementation would require removal of the majority of the southbound right-turn pocket. The proposed configuration with the North Portal would be one through lane and one shared through-right-turn lane on the southbound Beverly Drive approach. A minimal amount of storage (length of one vehicle) would be provided to allow vehicles turning right onto Wilshire Boulevard to yield to pedestrians without impeding traffic flows on southbound Beverly Drive. On-street parking, including bus loading, would be removed on North Beverly Drive between the Beverly Cañon Gardens mid-block crosswalk and Wilshire Boulevard with the Project. Lane geometries on Wilshire Boulevard would remain as existing.
- **Wilshire Boulevard/Cañon Drive** (signalized)
The Cañon Drive-Half Portal Alternative would be located on the west side of North Cañon Drive north of Wilshire Boulevard. Implementation would require striping changes to shift the vehicle travel lanes on North Cañon Drive to the east; however, the lane geometries on North Cañon Drive would remain as is with two northbound and two southbound travel lanes. On-street parking, including valet operations, would be removed on North Cañon Drive between Clifton Way and Wilshire Boulevard with the Cañon Drive-Half Portal Alternative. Lane geometries on Wilshire Boulevard would also remain as existing.

- Clifton Way/North Cañon Drive** (stop controlled)
 The Cañon Drive-Half Portal Alternative would be located on the west side of North Cañon Drive and the Cañon Drive Staging Yard Alternative would be located in the construction staging yard on the north side of Wilshire Boulevard between North Cañon Drive and the alley (adjacent to Crescent Drive) to the east. Neither alternative would affect the lane geometries at the intersection of Clifton Way and North Cañon Drive. However, this intersection is in close proximity to both portal Alternatives and is the only remaining unsignalized intersection in the study area. With the installation of the North Portal under the Cañon Drive-Half Portal Alternative or Cañon Drive Staging Yard Alternative, a traffic signal would be installed to improve vehicle flows and pedestrian access to the station. On-street parking, including valet operations, would be removed on North Cañon Drive between Clifton Way and Wilshire Boulevard with the Cañon Drive-Half Portal Alternative. No parking would be removed with the Cañon Drive Staging Yard Alternative.



Figure 3.12-1 Transportation Study Area

A more detailed summary of existing transportation facilities is included in Section 3.12.3. Potential transportation impacts under CEQA – including to existing and planned roadway, bicycle, pedestrian, and transit facilities – are summarized in Section 3.12.4.

Methodology

The approach for evaluating transportation impacts under CEQA is described in more detail below in CEQA Thresholds.

CEQA Thresholds

SB 743 directed OPR to “prepare, develop, and transmit to the Secretary of the Natural Resources Agency for certification and adoption proposed revisions to the guidelines adopted pursuant to Section 21083 establishing criteria for determining the significance of transportation impacts of projects within transit priority areas... Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion within a transit priority area, shall not support a finding of significance pursuant to this division...”.

On January 20, 2016, OPR updated the CEQA Guidelines “Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA”. In this update, the evaluation of VMT was recognized as “generally the most appropriate measure of transportation impacts.” On November 2017, OPR proposed a new section, 15064.3, to help determine the significance of transportation impacts. The purpose of this section is to describe specific elements for considering the transportation impacts of a given project given the use of VMT as the primary measurement. This section was updated in July 2018 and finalized in December 2018 with criteria for analyzing transportation impacts, those of which are shown below in Section 3.12.2.

Per the guidance from OPR, “a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide.” The City of Beverly Hills formally adopted the use of VMT for CEQA transportation impacts on October 11, 2019.

In accordance with Appendix G of the CEQA Guidelines, the Project and Project Alternatives would have a significant impact related to transportation if it would:

1. **Conflict with a program, plan, ordinance or policy** addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities.
2. **Conflict or be inconsistent with CEQA Guidelines Section 15064.3, Subdivision (b) per the following criteria:**
 - a. **Land Use Projects.** Vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor should be presumed to cause a less than significant transportation impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be presumed to have a less than significant transportation impact.
 - b. **Transportation Projects.** Transportation projects that reduce, or have no impact on, vehicle miles traveled should be presumed to cause a less than significant transportation impact. For roadway capacity projects, agencies have discretion to determine the appropriate measure of transportation impact consistent with CEQA and other applicable requirements. To the extent that such impacts have already been adequately addressed at a programmatic level, such as in a regional transportation plan EIR, a lead agency may tier from that analysis as provided in Section 15152.
 - c. **Qualitative Analysis.** If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead

agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate.

- d. **Methodology.** A lead agency has discretion to choose the most appropriate methodology to evaluate a project's vehicle miles traveled, including whether to express the change in absolute terms, per capita, per household or in any other measure. A lead agency may use models to estimate a project's vehicle miles traveled, and may revise those estimates to reflect professional judgment based on substantial evidence. Any assumptions used to estimate vehicle miles traveled and any revisions to model outputs should be documented and explained in the environmental document prepared for the project. The standard of adequacy in Section 15151 shall apply to the analysis described in this section.
3. **Substantially increase hazards** due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).
4. **Result in inadequate emergency access.**

A summary of potential Project and Project Alternatives impacts to transportation and mitigation measures is included in Section 3.12.4.

3.12.3 Existing Conditions

This section provides an overview of existing transportation facilities within the study area.

Roadway System

Major roadways within the vicinity of the study area include the following:

Wilshire Boulevard is an east-west Principal Arterial that extends from the Pacific Ocean in the City of Santa Monica to downtown Los Angeles. Within the City of Beverly Hills, Wilshire Boulevard provides three travel lanes in each direction. Wilshire Boulevard provides access to Cañon Drive and Beverly Drive at signalized intersections.

Beverly Drive is a north-south roadway that extends from the residential hills area in the north to Harlow Avenue in the south. Within the vicinity of the study area, the roadway is classified as a Minor Arterial and provides two lanes in each direction. Access from North Beverly Drive is restricted to through vehicles continuing onto S. Beverly Drive and right-turns onto Wilshire Boulevard. No left-turns onto eastbound Wilshire Boulevard are permitted.

Cañon Drive is a north-south Local Street that extends from Sunset Boulevard in the north to S. Beverly Drive in the south. Within the vicinity of the study area, the roadway provides a single lane in each direction south of Wilshire Boulevard and two lanes in each direction north of Wilshire Boulevard. Access from S. Cañon Drive is restricted to right-turn only onto Wilshire Boulevard, and full access is provided between North Cañon Drive and Wilshire Boulevard.

Emergency Access

The Beverly Hills Police Department (BHPD) and Beverly Hills Fire Department (BHFD) each provide emergency services within the City of Beverly Hills. The BHPD is located at 464 North Rexford Drive (approximately 0.7 miles north of the Project and Project Alternatives sites, driving distance). The BHFD operates the following three fire stations located around the City:

- Station #1 (Headquarters): 455 North Rexford Drive (approximately one-half mile north of the Project and Project Alternatives sites)
- Station #2 (Coldwater Canyon): 1100 Coldwater Canyon Drive (approximately 2.2 miles north of the Project and Project Alternatives sites)
- Station #3 (Doheny Drive): 180 South Doheny Drive (approximately one-half mile east of the Project and Project Alternatives sites) (BHFD 2019).

Cedars Sinai Medical Center is the closest major hospital to the study area and is located at 8730 Alden Drive in the City of Los Angeles (approximately 1.5 miles northeast of the Project and Project Alternatives sites).

Wilshire Boulevard provides direct access to the Project and alternatives for emergency vehicles. Within the City of Beverly Hills, emergency vehicles may also access the Project and Project Alternatives sites via North Rexford Drive, North Crescent Drive, and Doheny Drive.

Public Transit Service

Several transit lines operate within the study area with service provided by the Metropolitan Transportation Authority (Metro). Metro made minor route adjustments to Line 14 in conjunction with the advanced utility work being conducted for the Metro Purple Line construction project and the closure of North Cañon Drive at Wilshire Boulevard. In addition, Metro relocated several bus stops in the area due to on-going construction activities on Wilshire Boulevard in January 2018. The bus stops were relocated outside of the Metro Purple Line construction zone with the new eastern bus stops on Wilshire Boulevard between Rexford Drive and Crescent Drive and the new western bus stops on Wilshire Boulevard between Camden Drive and Rodeo Drive.

Existing public transit service is shown on Figure 3.12-. Metro is currently preparing the NextGen Bus Plan with the goal of implementing a new bus network in Los Angeles County that would be more relevant and reflective of local and regional travel needs. Some of the existing routes in Beverly Hills may be modified as a result of the NextGen Bus Plan.

Metro Line 4 provides service between downtown Los Angeles and the City of Santa Monica. The service route primarily travels along Santa Monica Boulevard connecting the communities of Los Angeles, West Hollywood, Beverly Hills, Century City, West Los Angeles, and Santa Monica.

Line 4 is a local service bus and has frequent stops along North Santa Monica Boulevard in Beverly Hills. Within the study area, both eastbound and westbound buses travel through the City of Beverly Hills along North Santa Monica Boulevard. Service is provided approximately every ten to fifteen minutes Monday through Saturday and approximately every twenty minutes on Sunday.

Metro Line 14 provides service between downtown Los Angeles and the City of Beverly Hills. The service route primarily travels along Beverly Boulevard connecting the communities of Los Angeles, Hancock Park, Park La Brea, Fairfax Village, West Hollywood, and Beverly Hills.

Line 14 is a local service bus and has frequent stops along Beverly Drive in Beverly Hills. Most stops are approximately one to two blocks apart. Within the study area, eastbound buses travel through the City of Beverly Hills by traveling in a northbound direction on Beverly Drive, making a right-turn onto North Santa Monica Boulevard, and then a right-turn onto Beverly Boulevard. Buses traveling in the westbound direction through the City travel west along Beverly Boulevard, make a left-turn onto North Santa Monica Boulevard, and a left-turn onto North Beverly Drive. Service is provided approximately every fifteen minutes on weekdays and approximately every twenty minutes on weekends.

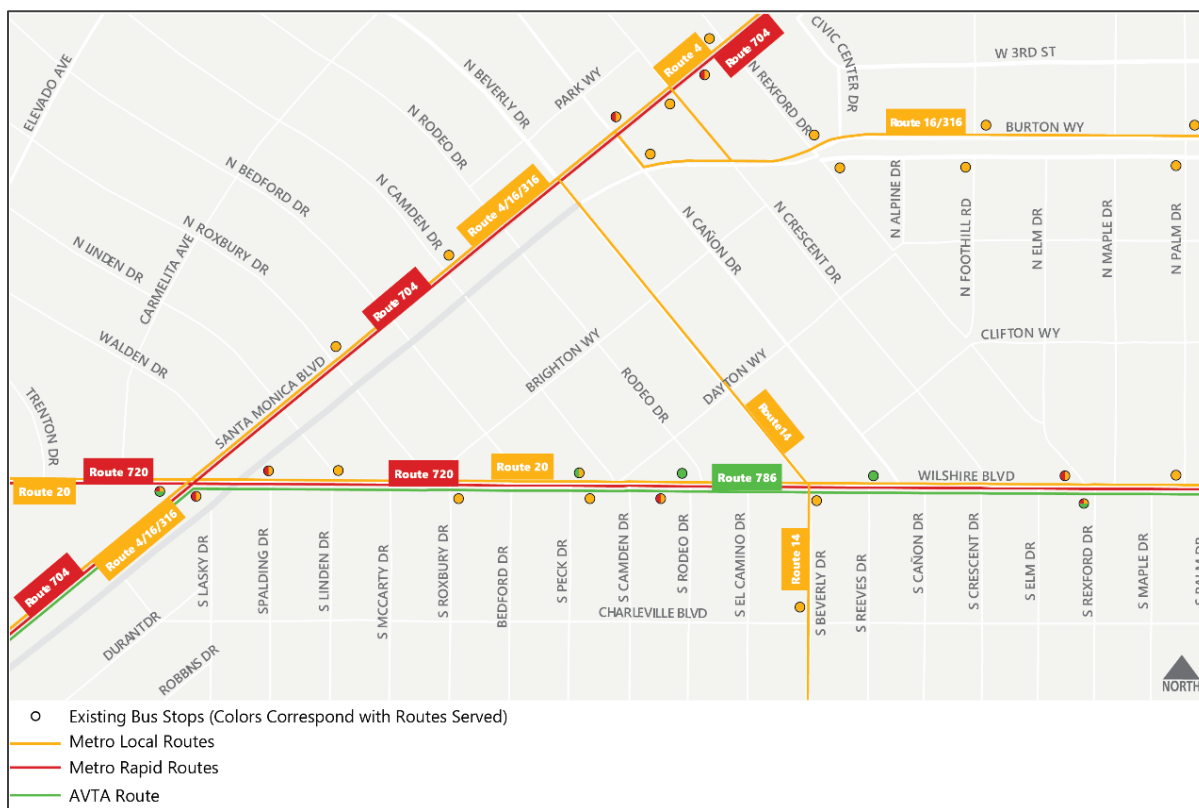


Figure 3.12-2 Existing Public Transit Service

Metro Line 16/316 provides service between downtown Los Angeles and the City of Century City. The service route primarily travels along 3rd Street, Burton Way, and North Santa Monica Boulevard connecting the communities of Los Angeles, Hancock Park, Park La Brea, Beverly Grove, West Hollywood, Beverly Hills, and Century City.

In Beverly Hills, Lines 16 and 316 provide overlapping local bus service with frequent stops along Burton Way and North Santa Monica Boulevard. Most stops are approximately one to two blocks apart. Within the study area, eastbound buses travel through the City of Beverly Hills by traveling in a northbound direction on North Santa Monica Boulevard, making a right-turn onto South Crescent Drive, and then a left-turn onto Burton Way. Buses traveling in the westbound direction through the City travel west along Burton Way, make a right-turn onto North Cañon Drive, and then a left-turn onto North Santa Monica Boulevard. Within the City of Beverly Hills,

service is provided approximately every ten minutes on weekdays by Line 16/316 and approximately every thirty minutes on weekends by Line 16.

Metro Line 20 provides service between downtown Los Angeles and the City of Santa Monica with service along Wilshire Boulevard. The route travels along Wilshire Boulevard connecting the communities of Beverly Hills, Los Angeles, Hancock Park, Park La Brea, Santa Monica, UCLA, West Los Angeles, and Westwood. Line 20 is a local service bus and has frequent bus stops along Wilshire Boulevard. Most stops are approximately one to two blocks apart. Service is provided every fifteen to twenty minutes on weekdays and twenty minutes on weekends.

Metro Rapid Line 704 provides an express service between downtown Los Angeles and the City of Santa Monica with principal service along Wilshire Boulevard as part of Metro's Rapid network. The line travels along N. Santa Monica Boulevard connecting the communities of downtown Los Angeles, Echo Park, Silver Lake, West Hollywood, Beverly Hills, Century City, Westwood, West Los Angeles, and Santa Monica. Bus service along North Santa Monica Boulevard in Beverly Hills is approximately every fifteen minutes on weekdays and twenty to twenty-five minutes on weekends.

Metro Rapid Line 720 provides an express service between East Los Angeles and the City of Santa Monica with principal service along Wilshire Boulevard as part of Metro's Rapid network. The line travels along Wilshire Boulevard connecting the communities of Beverly Hills, Boyle Heights, Brentwood, Commerce, downtown Los Angeles, East Los Angeles, Hancock Park, Koreatown, Park La Brea, Santa Monica, and Westwood. Bus service along Wilshire Boulevard is approximately every five to ten minutes on weekdays and every ten minutes on weekends.

Antelope Valley 786 provides service between Lancaster/Palmdale to Century City/West Los Angeles with service along Santa Monica Boulevard and Wilshire Boulevard. It travels along Santa Monica Boulevard connecting the communities of Westwood, Century City, and Beverly Hills, and along Wilshire Boulevard connecting the communities of Los Angeles, Hancock Park, Park La Brea, and Hollywood. Line 786 is a commuter service bus running only during peak hours on weekdays with service every twenty minutes to thirty minutes.

Bicycle and Pedestrian Facilities

Class II bike lanes are located along North Santa Monica Boulevard, and a Class III bicycle facility ("sharrows") exists along North Crescent Drive north of Wilshire Boulevard. While bicyclists can travel on all roadways in the City, no other designated facilities are provided in the study area.

Pedestrian sidewalks exist along all of the roadways within the study area. Pedestrian crosswalks are present at each of the signalized intersections within the study area, though some pedestrian movements are restricted at the intersection of Wilshire Boulevard and Cañon Drive. Specifically, the pedestrian crossings at Wilshire Boulevard and North Cañon Drive and Wilshire Boulevard and South Cañon Drive are restricted to the western side of the intersections due to the offset of North and South Cañon Drives and to prevent conflicts with left-turning vehicles. Signalized mid-block crossings are located on North Beverly Drive between Wilshire Boulevard and Dayton Way and on North Cañon Drive between Clifton Way and Dayton Way. At the stop-controlled intersection of Clifton Way and North Cañon Drive, crosswalks are provided on each leg of the intersection.

3.12.4 Impact Evaluation

This section summarizes transportation impacts and mitigation measures under CEQA for the proposed Project and Project Alternatives. Potential temporary construction impacts and permanent operational impacts were evaluated. A description of the Project and Project Alternatives, including detailed construction scenarios, is included in Chapter 2, Project Description.

Possible construction means and methods employed during construction would be determined by the construction contractor and may differ from those outlined in Chapter 2, Project Description. The construction process would include provisions for site establishment, laydown and staging areas, haul routes and traffic control, utility relocations, connection with the existing station, and systems connections.

The evaluation of traffic impacts to level of service (LOS) is no longer required under CEQA and as such is not included in this section. Any effects to traffic operations during construction would be temporary, with the duration of each impact dependent on the duration of specific construction activities.

Impact TR-1. Would the project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities?

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to programs, plans, ordinances, or policies addressing the circulation system, including transit, roadways, bicycle, and pedestrian facilities would occur.

The Project (Beverly Drive)

Construction Impacts

Construction of the Project would commence in the third quarter 2022, with an anticipated revenue service date of third quarter 2025. Construction would take approximately 2.5 to 3.5 years. The following transportation effects would occur during construction of the Project:

- North Beverly Drive would be closed between Wilshire Boulevard and Beverly Cañon Gardens for the duration of the construction
- A cul-de-sac would be provided southbound on North Beverly Drive to allow vehicles to turn around prior to the closure
- One lane of Wilshire Boulevard would be required to be closed for loading/off-loading construction materials
- Bus stops on Wilshire Boulevard would continue to be relocated away from the construction zone for the duration of construction (stops are currently relocated due to construction activities)

- South Beverly Drive will require restriping and re-signaling as traffic would be required to either turn left or right with no ability to travel north (except for construction vehicles)
- An additional lane along Wilshire Boulevard would be closed during pile installation and installation/removal of decking, resulting in a total of five lanes along Wilshire Boulevard (two eastbound, two westbound, and the westbound left-turn pocket into South Beverly Drive)
- The sidewalk on the west side of North Beverly Drive would be closed during piling activity
- The sidewalk on the north side of Wilshire Boulevard would be closed to provide construction vehicle access during piling activity
- Eight (8) metered on-street parking spaces along North Beverly Drive would be removed for the duration of construction
- The existing valet zone for the Montage Hotel along North Beverly Drive would be relocated for the duration of construction
- The Metro Purple Line may be subject to a potential temporary closure when connecting the Project to the existing station platform and concourse
- Wilshire Boulevard would be restriped and re-signaled to eliminate turns from Wilshire Boulevard onto North Beverly Drive

Project construction would disrupt the circulation system through temporary roadway closures, lane closures, and sidewalk closures resulting in a temporary significant impact. The implementation of Mitigation Measures TRA-A, TRA-B, and TRA-C would provide traffic control plans, designated haul routes, and a Transportation Management Plan (TMP) to minimize disruptions during construction.

Operational Impacts

The Project would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. With the North Portal, pedestrian access would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard. The signalized mid-block crossing on North Beverly Drive between Wilshire Boulevard and Dayton Way would also provide pedestrian access to the North Portal for those walking to/from the eastern portion of the downtown area. The Project would not preclude enhancements to sidewalks or other policies, programs, or projects identified in the *City of Beverly Hills General Plan Circulation Element* (City of Beverly Hills, 2010) or *City of Beverly Hills Draft Complete Streets Plan* (City of Beverly Hills 2019).

The Project would support transit use by enhancing station access, as well as support several regional and local plans and policies and would not conflict with previously adopted regional or local policies or plans related to roadway circulation. Therefore, the Project would result in no impacts.

Cañon Drive-Half Portal Alternative

Construction Impacts

Construction of the Cañon Drive-Half Portal Alternative would commence in the third quarter 2022, with an anticipated revenue service date of third quarter 2025. Construction would take approximately 2.5 to 3.5 years. The following transportation effects would occur during construction of the Cañon Drive Alternative:

- North Cañon Drive would be closed between Wilshire Boulevard to the south side of Clifton Way for the duration of construction
- One lane of Wilshire Boulevard would be closed for loading/off loading
- The sidewalk on the north side of Wilshire Boulevard would be closed to provide construction vehicle access during piling activity
- Bus stops on Wilshire Boulevard would continue to be relocated away from the construction zone for the duration of construction (stops are currently relocated due to construction activities)
- An additional lane along Wilshire Boulevard would be closed during pile installation and installation/removal of decking, resulting in a total of one westbound lane
- Ten (10) metered on-street parking spaces along North Cañon Drive would be removed for the duration of construction
- The Metro Purple Line may be subject to a potential temporary closure when connecting the Cañon Drive-Half Portal Alternative to the existing station platform and concourse
- Wilshire Boulevard would be restriped and re-signaled to eliminate turns from Wilshire Boulevard onto North Cañon Drive

With the Cañon Drive-Half Portal Alternative, construction would disrupt the circulation system through temporary roadway closures, lane closures, and sidewalk closures resulting in a temporary significant impact. The implementation of Mitigation Measures TRA-A, TRA-B, and TRA-C would provide traffic control plans, designated haul routes, and a TMP to minimize disruptions during construction.

Operational Impacts

The Cañon Drive-Half Portal Alternative would support several regional and local plans and policies and would not conflict with adopted regional or local policies or plans related to roadway circulation. The Cañon Drive-Half Portal Alternative would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. The Cañon Drive-Half Portal Alternative would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard.

The Cañon Drive-Half Portal Alternative would not preclude enhancements to sidewalks or other policies, programs, or projects identified in the *City of Beverly Hills General Plan Circulation Element* (City of Beverly Hills, 2010) or *City of Beverly Hills Draft Complete Streets Plan* (City of Beverly Hills, 2019). The Cañon Drive-Half Portal Alternative would support transit use by enhancing station access and would not conflict with transit improvements identified in regional

and local planning documents, or conflict with a program, plan, ordinance or policy addressing the circulation system. Therefore, the Cañon Drive-Half Portal Alternative would have no impact.

Cañon Drive Staging Yard Alternative

Construction Impacts

Construction of the Cañon Drive Staging Yard Alternative would commence in the first quarter 2024, with an anticipated revenue service date of third quarter 2026. Construction would take approximately 2.5 to 3.5 years. The following transportation effects would occur during construction of the Cañon Drive-Half Portal Alternative:

- A portion of North Cañon Drive north of Wilshire Boulevard would be closed for the duration of construction
- One lane of Wilshire Boulevard and the north sidewalk would be closed for the duration of construction to allow for deliveries and hauling away from the site
- Bus stops on Wilshire Boulevard would continue to be relocated away from the construction zone for the duration of construction (stops are currently relocated due to construction activities)
- An additional lane along Wilshire Boulevard would be closed during pile installation, resulting in a total of one westbound lane. This work may be performed during nighttime and weekend closures
- The Metro Purple Line may be subject to a potential temporary closure when connecting the Cañon Drive Staging Yard Alternative to the existing station platform and concourse

With the Cañon Drive Staging Yard Alternative, construction would disrupt the circulation system through temporary roadway closures, lane closures, and sidewalk closures resulting in a temporary significant impact. The implementation of Mitigation Measures TRA-A, TRA-B, and TRA-C would provide traffic control plans, designated haul routes, and a TMP to minimize disruptions during construction.

Operational Impacts

The Cañon Drive Staging Yard Alternative would support several regional and local plans and policies and would not conflict with adopted regional or local policies or plans related to roadway circulation. The Cañon Drive Staging Yard Alternative would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas, specifically the areas north of Wilshire Boulevard. The Cañon Drive Staging Yard Alternative would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard.

Based on the review of applicable programs, plans, and policies addressing the circulation system, including transit, roadways, bicycle and pedestrian facilities, the Cañon Drive Staging Yard Alternative would have no impact.

Impact TR-2. Would the project conflict with CEQA Guidelines section 15064.3, subdivision (b) related to transportation impacts?

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to transportation as defined in CEQA Guidelines section 15064.3 subdivision (b) would occur.

The Project (Beverly Drive)

Construction Impacts

Construction of the Project would require a temporary closure of North Beverly Drive between Wilshire Boulevard and Beverly Cañon Gardens for the duration of construction. This closure would require motorists to travel along detour routes, which could cause VMT to increase. In addition, construction of the Project would require truck trips to be made for delivery of materials to the construction site and export of materials from the construction site. The following truck trips are anticipated:

- Piling and Excavation: 12 export truck (20 cubic yard trucks) trips and two truck deliveries of supplies per day
- Construction of the North Station Entrance/Exit: up to two standard concrete trucks, eight large concrete pour trucks, and up to four support/delivery trucks per day. Backfill activity would be performed using 19 trucks during the peak backfill period.

For the Project, the preliminary inbound haul route would travel east/northeast on Santa Monica Boulevard from the I-405 off-ramps, and then east on Wilshire Boulevard to the Project site. The outbound haul route would be similar with travel west from the Project site to Wilshire Boulevard, and then west/southwest on Santa Monica Boulevard to the I-405 on-ramps. Additional haul routes specified for the construction of the Wilshire/Rodeo Station may also be utilized to limit disruptions to the community and road users. An alternative export haul route would travel east from the Project site on Wilshire Boulevard where it would turn south on South Robertson Boulevard, then west onto Pico Boulevard, then northwest onto Westwood Boulevard, and finally west onto Santa Monica Boulevard leading to the I-405 on-ramps.

The inbound and outbound haul routes were selected to occur on major arterial streets to minimize noise, vibration and other effects to adjacent businesses, schools, major commercial developments and residential neighborhoods. Consultation would be carried out and approval would be sought from the City of Beverly Hills (as well as the City of Los Angeles and Caltrans if required) during the environmental approval process to ensure the overall suitability of the proposed haul route in terms of practicality and minimization of potential effects. As such, the final haul route for the Project may be subject to change.

For the Project, the primary access gate to the construction area for deliveries and hauling would be provided on Wilshire Boulevard and a secondary access gate would be provided on North Beverly Drive. The primary access gate on Wilshire Boulevard would be located adjacent to the northernmost traffic lane in the westbound direction of travel.

Any increase in VMT resulting from out-of-direction travel or construction truck delivery/hauling trips would be temporary in nature, and therefore, would not permanently conflict with CEQA guidelines section 15064.3, subdivision (b) related to transportation impacts. Therefore, the impact of the Project would be less than significant.

Operational Impacts

The Project would enhance access to the Purple Line Extension Wilshire/Rodeo Station by providing a second portal on the north side of Wilshire Boulevard in closer proximity to the business district. The installation of the Project is not expected to increase vehicle travel flows or increase VMT in the study area. By enhancing access to the Wilshire/Rodeo Station, the Project would either reduce or have no impact on VMT. Based on CEQA Guidelines section 15064.3, the Project would have no impact.

Cañon Drive-Half Portal Alternative

Construction Impacts

Construction of the Cañon Drive-Half Portal Alternative would require a temporary closure of North Cañon Drive between Wilshire Boulevard to the south side of Clifton Way for the duration of construction. This closure would require motorists to travel along detour routes, which could cause VMT to increase. In addition, construction of the Cañon Drive-Half Portal Alternative would require truck trips to be made for delivery of materials to the construction site and export of materials from the construction site. The following truck trips are anticipated:

- Piling and Excavation: 10 export truck (20 cubic yard trucks) trips and two truck deliveries of supplies per day
- Construction of the North Station Entrance/Exit: up to two standard concrete trucks, seven large concrete pour trucks, and up to three support/delivery trucks per day. Backfill activity would be performed using 17 trucks during the peak backfill period.

For the Cañon Drive Alternative, the preliminary inbound haul route would travel east/northeast on Santa Monica Boulevard from the I-405 off-ramps, and then east on Wilshire Boulevard to the Cañon Drive Alternative site. The outbound haul route would be similar with travel west from the Cañon Drive Alternative site to Wilshire Boulevard, and then west/southwest on Santa Monica Boulevard to the I-405 on-ramps. Additional haul routes specified for the construction of the Wilshire/Rodeo Station may also be utilized to limit disruptions to the community and road users. An alternative export haul route would travel east from the site on Wilshire Boulevard where it would turn south on South Robertson Boulevard, then west onto Pico Boulevard, then northwest onto Westwood Boulevard, and finally west onto Santa Monica Boulevard leading to the I-405 on-ramps.

The inbound and outbound haul routes were selected to occur on major arterial streets to minimize noise, vibration and other effects to adjacent businesses, schools, major commercial developments and residential neighborhoods. Consultation would be carried out and approval would be sought from the City of Beverly Hills (as well as the City of Los Angeles and Caltrans if required) during the environmental approval process to ensure the overall suitability of the proposed haul route in terms of practicality and minimization of potential effects. As such, the final haul route for the Cañon Drive Alternative may be subject to change.

For the Cañon Drive-Half Portal Alternative, deliveries and hauling are expected to occur from Wilshire Boulevard. While a gate is provided on North Cañon Drive, this is expected to be used

as a secondary entrance/exit. The primary access gate on Wilshire Boulevard would be located adjacent to the northernmost traffic lane in the westbound direction of travel.

Any increase in VMT resulting from out-of-direction travel or construction truck delivery/hauling trips would be temporary in nature, and therefore, would not permanently conflict with CEQA guidelines section 15064.3, subdivision (b) related to transportation impacts. Therefore, the impact of the Cañon Drive-Half Portal Alternative would be less than significant.

Operational Impacts

The Cañon Drive-Half Portal Alternative would enhance access to the Purple Line Extension Wilshire/Rodeo Station by providing a second portal on the north side of Wilshire Boulevard in closer proximity to the business district. The installation of the Cañon Drive-Half Portal Alternative is not expected to increase vehicle travel flows or increase VMT in the study area. By enhancing access to the Wilshire/Rodeo Station, the Cañon Drive-Half Portal Alternative would either reduce or have no impact on VMT in accordance with CEQA Guidelines section 15064.3, therefore there would be no impact.

Cañon Drive Staging Yard Alternative

Construction Impacts

Construction of the Cañon Drive Staging Yard Alternative would require temporarily closing a portion of North Cañon Drive north of Wilshire Boulevard for the duration of construction. This closure would require motorists to travel along detour routes, which could cause VMT to increase. In addition, construction of the Cañon Drive Staging Yard Alternative would require truck trips to be made for delivery of materials to the construction site and export of materials from the construction site. The following truck trips are anticipated:

- Piling and Excavation: eight export truck (20 cubic yard trucks) trips and one truck delivery of supplies per day
- Construction of the North Station Entrance/Exit: one standard concrete truck, five large concrete pour trucks, and up to three support/delivery trucks per day. Backfill activity would be performed using 13 trucks during the peak backfill period.

For the Cañon Drive Staging Yard Alternative, the preliminary inbound haul route would travel east/northeast on Santa Monica Boulevard from the I-405 off-ramps, and then east on Wilshire Boulevard to the Cañon Drive Staging Yard Alternative site. The outbound haul route would be similar with travel west from the Cañon Drive Staging Yard Alternative site to Wilshire Boulevard, and then west/southwest on Santa Monica Boulevard to the I-405 on-ramps. Additional haul routes specified for the construction of the Wilshire/Rodeo Station may also be utilized to limit disruptions to the community and road users. An alternative export haul route would travel east from the site on Wilshire Boulevard where it would turn south on South Robertson Boulevard, then west onto Pico Boulevard, then northwest onto Westwood Boulevard, and finally west onto Santa Monica Boulevard leading to the I-405 on-ramps.

The inbound and outbound haul routes were selected to occur on major arterial streets to minimize noise, vibration and other effects to adjacent businesses, schools, major commercial developments and residential neighborhoods. Consultation would be carried out and approval would be sought from the City of Beverly Hills (as well as the City of Los Angeles and Caltrans if required) during the environmental approval process to ensure the overall suitability of the

proposed haul route in terms of practicality and minimization of potential effects. As such, the final haul route for the Cañon Drive Staging Yard Alternative may be subject to change.

For the Cañon Drive Staging Yard Alternative, deliveries and hauling are expected to occur from Wilshire Boulevard. The primary access gate on Wilshire Boulevard would be located adjacent to the northernmost traffic lane in the westbound direction of travel. While a gate is provided on North Cañon Drive, this can only function as a secondary entrance/exit due to space constraints within the yard.

Any increase in VMT resulting from out-of-direction travel or construction truck delivery/hauling trips would be temporary in nature, and therefore, would not permanently conflict with CEQA guidelines section 15064.3, subdivision (b) related to transportation impacts. Therefore, the impact of the Cañon Drive Staging Yard Alternative would be less than significant.

Operational Impacts

The Cañon Drive Staging Yard Alternative would enhance access to the Purple Line Extension Wilshire/Rodeo Station by providing a second station entrance/exit on the north side of Wilshire Boulevard in closer proximity to the business district. The installation of the North Portal is not expected to increase vehicle travel flows or increase VMT in the study area. By enhancing access to the Wilshire/Rodeo Station, the Cañon Drive Staging Yard Alternative would either reduce or have no impact on VMT. Based on CEQA Guidelines section 15064.3, the Cañon Drive Staging Yard Alternative would have no impact.

Impact TR-3. Would implementation of the project substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses?

The Project (Beverly Drive)

Construction Impacts

With the construction of the Project, the temporary closure of North Beverly Drive between Wilshire Boulevard and Beverly Cañon Gardens and lane closure(s) on Wilshire Boulevard would increase hazards due to geometric design features resulting in a temporary significant impact. The implementation of Mitigation Measure TRA-A would provide traffic control plans to minimize impacts to the degree possible for each work zone. The traffic control plans would be reviewed and approved by the City of Beverly Hills prior to implementation.

Operational Impacts

As described in Section 3.12.2, the Project would require removal of the majority of the southbound right-turn pocket. The proposed configuration of the Project would consist of one through lane and one shared through-right-turn lane on the southbound Beverly Drive approach. A minimal amount of storage (length of one vehicle) would be provided to allow vehicles turning right onto Wilshire Boulevard to yield to pedestrians without impeding traffic flows on southbound Beverly Drive. Lane geometries on Wilshire Boulevard would remain as is. It is anticipated that the new configuration will be designed using current roadway and intersection design guidelines as specified in the *California Highway Design Manual* (California Department of Transportation, 2019), and no design exceptions are anticipated. In addition, pedestrian crossings would be maintained. As such, the modified intersection configuration is not

anticipated to contain any hazardous geometric design features and the Project would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

With the construction of the Cañon Drive-Half Portal Alternative, the temporary closure of North Cañon Drive between Wilshire Boulevard and Clifton Way and lane closure(s) on Wilshire Boulevard would increase hazards due to geometric design features resulting in a temporary significant impact. The implementation of Mitigation Measure TRA-A would provide traffic control plans to minimize impacts to the degree possible for each work zone. The traffic control plans would be reviewed and approved by the City of Beverly Hills prior to implementation.

Operational Impacts

The Cañon Drive-Half Portal Alternative would be located on the west side of North Cañon Drive north of Wilshire Boulevard. Implementation would require striping changes to shift the vehicle travel lanes on North Cañon Drive to the east; however, the lane geometries on North Cañon Drive would remain as is with two northbound and two southbound travel lanes. Lane geometries on Wilshire Boulevard would also remain as is. The Cañon Drive-Half Portal Alternative would not affect the lane geometries at the intersection of Clifton Way and North Cañon Drive. However, this intersection is in close proximity to the station portal and is the only remaining unsignalized intersection in the study area. With the installation of the North Portal under the Cañon Drive-Half Portal Alternative, a traffic signal would be installed to improve vehicle flows and pedestrian access to the station. It is anticipated that the new intersection configuration and traffic signal would be designed in conformance with design guidelines as specified in the *California Highway Design Manual* (California Department of Transportation, 2019), and no design exceptions are anticipated. As such, the new intersection configuration and traffic signal are not anticipated to contain any hazardous geometric design features and the Cañon Drive-Half Portal Alternative would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

With the construction of the Cañon Drive Staging Yard Alternative, the temporary closure of North Cañon Drive to the north of the current construction barrier at Wilshire Boulevard and lane closure(s) on Wilshire Boulevard would increase hazards due to geometric design features resulting in a temporary significant impact. The implementation of Mitigation Measure TRA-A would provide traffic control plans to minimize impacts to the degree possible for each work zone. The traffic control plans would be reviewed and approved by the City of Beverly Hills prior to implementation.

Operational Impacts

The Cañon Drive Staging Yard Alternative would not affect the lane geometries on North Cañon Drive or Wilshire Boulevard. In addition, this alternative would not affect the adjacent alley. However, the intersection of Clifton Way and North Cañon Drive is approximately 400 feet from the Cañon Drive Staging Yard Alternative and is the only remaining unsignalized intersection in the study area. With the installation of the Cañon Drive Staging Yard Alternative, a traffic signal would be installed to improve vehicle flows and pedestrian access to the station. It is anticipated

that the traffic signal would be designed in conformance with design guidelines as specified in the *California Highway Design Manual* (California Department of Transportation, 2019). As such, the new traffic signal is not anticipated to contain any hazardous geometric design features and the Cañon Drive Staging Yard Alternative would be less than significant.

Impact TR-4. Would implementation of the project result in inadequate emergency access?

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to emergency access would occur.

The Project (Beverly Drive)

Construction Impacts

Construction of the Project would require temporarily closing North Beverly Drive between Wilshire Boulevard and Beverly Cañon Gardens, one lane along Wilshire Boulevard for the duration of construction, and an additional lane along Wilshire Boulevard during pile installation and installation/removal of decking. Increased traffic congestion and access disruptions caused by closures during construction could affect emergency access and response times resulting in a temporary significant impact. The implementation of Mitigation Measure TRA-D would provide emergency vehicle access to the construction work site, adjacent businesses, and adjacent residential areas and require that construction activities be coordinated with City law enforcement and fire department officials prior to implementation.

Operational Impacts

The Project would not change emergency access in the study area. As noted in Section 3.12.3, fire, police, and medical personnel generally access the station area from areas north and east of the Project site. Given that the North Portal would not change emergency access in the study area and would provide a secondary access point to the subway station, the Project would have no impact.

Cañon Drive-Half Portal Alternative

Construction Impacts

Construction of the Cañon Drive-Half Portal Alternative would require temporarily closing North Cañon Drive between Wilshire Boulevard to the south side of Clifton Way, one lane along Wilshire Boulevard for the duration of construction, and an additional lane along Wilshire Boulevard during pile installation and installation/removal of decking. Increased traffic congestion and access disruptions caused by closures during construction could affect emergency access and response times resulting in a temporary significant impact. The implementation of Mitigation Measure TRA-D would provide emergency vehicle access to the construction work site, adjacent businesses, and adjacent residential areas and require that construction activities be coordinated with City law enforcement and fire department officials prior to implementation.

Operational Impacts

The Cañon Drive-Half Portal Alternative would not change emergency access in the study area. As noted in Section 3.12.3, fire, police, and medical personnel generally access the station area from areas north and east of the Cañon Drive-Half Portal Alternative site. The Cañon Drive-Half Portal Alternative would provide an additional station access point to the subway station on the north side of Wilshire Boulevard. Given that the North Portal would not change emergency access in the study area and would provide a secondary access point to the subway station, the Cañon Drive-Half Portal Alternative would have no impact.

Cañon Drive Staging Yard Alternative

Construction Impacts

Construction of the Cañon Drive Staging Yard Alternative would require temporarily closing North Cañon Drive north of the current construction barrier at Wilshire Boulevard to provide for contractor laydown and construction, one lane along Wilshire Boulevard for the duration of construction, and an additional lane along Wilshire Boulevard during pile installation. Increased traffic congestion and access disruptions caused by closures during construction could affect emergency access and response times resulting in a temporary significant impact. The implementation of Mitigation Measure TRA-D would provide emergency vehicle access to the construction work site, adjacent businesses, and adjacent residential areas and require that construction activities be coordinated with City law enforcement and fire department officials prior to implementation.

Operational Impacts

The Cañon Drive Staging Yard Alternative would not change emergency access in the study area. As noted in Section 3.12.3, fire, police, and medical personnel generally access the station area from areas north and east of the Cañon Drive Staging Yard Alternative site. The Cañon Drive Staging Yard Alternative would provide an additional station access point to the subway station on the north side of Wilshire Boulevard, potentially improving emergency access to the station itself. Given that the North Portal would not change emergency access in the study area and would provide a secondary access point to the subway station, the Cañon Drive Staging Yard Alternative would have no impact.

3.12.5 Mitigation Measures

The following mitigation measures will be implemented to address potential construction-related impacts to transportation.

Project and Project Alternatives

TRA-A Traffic Control Plans. Site-specific traffic-control plans will be developed to minimize construction impacts to the degree possible for each work zone location. Traffic control plans will be prepared according to State guidelines and standards and approved by the City of Beverly Hills prior to implementation. Traffic control plans will encompass the necessary components of the street network effected by construction activities, such as travel lane widths, temporary lane closures, detour routes, traffic control devices, signing and striping, temporary access for pedestrians and bicyclists, and temporary business access.

During peak travel periods, two travel lanes will be maintained in each direction on Wilshire Boulevard. The traffic control plans will identify pedestrian routes and access to adjacent business during construction. Temporary pedestrian facilities will comply with the requirements of ADA and will be properly signed and lighted.

TRA-B Designated Haul Routes. Haul routes will utilize arterial streets to minimize impacts to circulation and residential neighborhoods. A truck haul route plan will be approved by the City prior to implementation. The plan shall include the haul routes to access the construction site, the allowable headways to avoid platoons of trucks along haul routes, and a schedule of hauling activities expected for each stage of construction.

TRA-C Transportation Management Plan (TMP). A TMP will be prepared and submitted to the City for review and approval prior to implementation. The TMP will include public information regarding construction activities, traveler information, incident management, demand management strategies, and expected construction activities. In addition, the TMP would include parking management to minimize the effects of temporary parking removal during construction and identify adequate off-street parking locations for construction workers. Development of the parking management strategies will be coordinated with the adjacent property owners.

TRA-D Emergency Vehicle Access. Emergency vehicle access will be maintained at all times to the construction work site, adjacent businesses, and adjacent residential areas. Emergency vehicle access will also be maintained at all times to and from fire stations, hospitals, and medical facilities near the construction site and along the haul routes. Construction activities, road closures, and lane closures will be coordinated with local law enforcement and fire department officials prior to implementation.

3.12.6 Impacts After Mitigation

During construction of the Project and Project Alternatives, significant impacts to transportation could occur. With implementation of Mitigation Measure TRA-A, TRA-B, TRA-C, and TRA-D, the level of impacts that would occur would be reduced to less than significant.

3.12.7 Cumulative Impacts

No Project Alternative

Related projects identified in the Project area generally include commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning transportation.

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to

transportation were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulative impact related to transportation.

The Project and Project Alternatives

Construction Impacts

The primary related construction projects within approximately one-mile of the Project and Project Alternatives that could potentially lead to cumulative transportation impacts is the construction activity of the Wilshire/Rodeo Station as part of Section 2 of the Purple Line Extension Project, which is currently under construction. However, it is currently anticipated that major aboveground construction activities for the Wilshire/Rodeo Station would be completed prior to any construction activity for the Project and Project Alternatives. In this case, there would be no significant overlap in the aboveground construction phases. The Project and Project Alternatives would implement mitigation measures as described in Section 3.12.5 to ensure that construction impacts related to transportation would be less than significant. Impacts for the Project and Project Alternatives would be less than significant, and as such, the Project and Project Alternatives would not contribute to a cumulatively considerable construction impact related to transportation.

Operational Impacts

The Project and Project Alternatives are not expected to significantly impact transportation during operations. Post-construction conditions would be similar to existing conditions as the Project would not significantly change existing conditions. As such, the Project would not contribute to a cumulatively considerable operational impact related to transportation.

3.12.8 Other Transportation Considerations

In addition to potential CEQA transportation impacts, the effects of potential pick-up/drop-off locations were evaluated for the Project and Project Alternatives.

Potential Pick-Up and Drop-Off Locations

This section describes the general pick-up and drop-off locations that were considered as part of the Project and Project Alternatives. The pick-up and drop-off locations will be further defined as part of the final design process. This evaluation is intended to provide an overview of where loading activities may occur with the Project and Project Alternatives.

Curbside Loading on Wilshire Boulevard

Curbside pick-up/drop-off along Wilshire Boulevard was evaluated but deemed to be infeasible due to the existing roadway geometric configuration. The provision of curb space along Wilshire Boulevard would create potential conflicts with vehicular traffic and would require removal of one travel lane, which would need to be studied in detail due to high traffic volumes that occur throughout the day and especially during peak hours. Instead of removing a travel lane, a parking bay could be provided on Wilshire Boulevard by reducing the sidewalk width. Providing curb cuts along Wilshire Boulevard to allow for loading activities would reduce the sidewalk width from approximately 15 feet to 7 feet. Given current pedestrian activity on Wilshire Boulevard and the increased demand expected with the North Portal, narrowing the sidewalk is not recommended. Therefore, other potential locations for loading activities were explored.

Passenger Loading in Existing Alleys

There are two alleys within the study area: one just west of North Beverly Drive, and another between North Cañon Drive and North Crescent Drive. Each of these alleys are currently used for commercial loading and valet parking operations for nearby restaurants and other commercial properties. Providing space for pick-up/drop-off activity in either alley would substantially disrupt existing operations. As such, this assessment does not include the alleys as possible pick-up/drop-off locations.

Beverly Gardens Parking Structure

The existing parking structure adjacent to Beverly Cañon Gardens could be used for pick-up/drop-off operations if it is not feasible to provide sufficient curb space for pick-up/drop-off activity along existing roadways. The Beverly Gardens Parking Structure has inbound and outbound access at both North Beverly Drive and North Cañon Drive north of the mid-block crosswalks between Wilshire Boulevard and Dayton Way. Pedestrian access is provided by an elevator (and stairway) on the north side of Beverly Cañon Gardens. A small area is provided on the first floor of the parking garage adjacent to the elevator that could be used as a pick-up/drop-off zone. Vehicles can maneuver through the first-floor drive aisles without taking a parking ticket as the parking gate is located on the second level of the structure.

Creating a loading zone in the structure would require geofencing the surrounding area to direct all loading activities within the vicinity of the North Portal to the Beverly Gardens Parking Structure. Additional technology requirements, such as adequate cell and Wi-Fi service in the garage, would need to be explored in greater detail if this loading option is considered. In addition, the geofencing could result in potential impacts to the loading activities for nearby businesses. However, as technology solutions advance and if pick-up and drop-off trips become more frequent over time, the structure could provide an alternative to on-street loading in the area. Any pick-up and drop-off strategies that are implemented in the parking structure would need to be done in coordination with the parking manager and adjacent businesses.

Curbside Loading on Adjacent Streets

The pick-up and drop-off evaluation focuses only on the roadways north of Wilshire Boulevard. This was done to draw North Portal pick-up and drop-off activity away from the residential neighborhoods located south of Wilshire Boulevard. Roadways evaluated include North Beverly Drive, North Cañon Drive, North Crescent Drive, and Clifton Way.

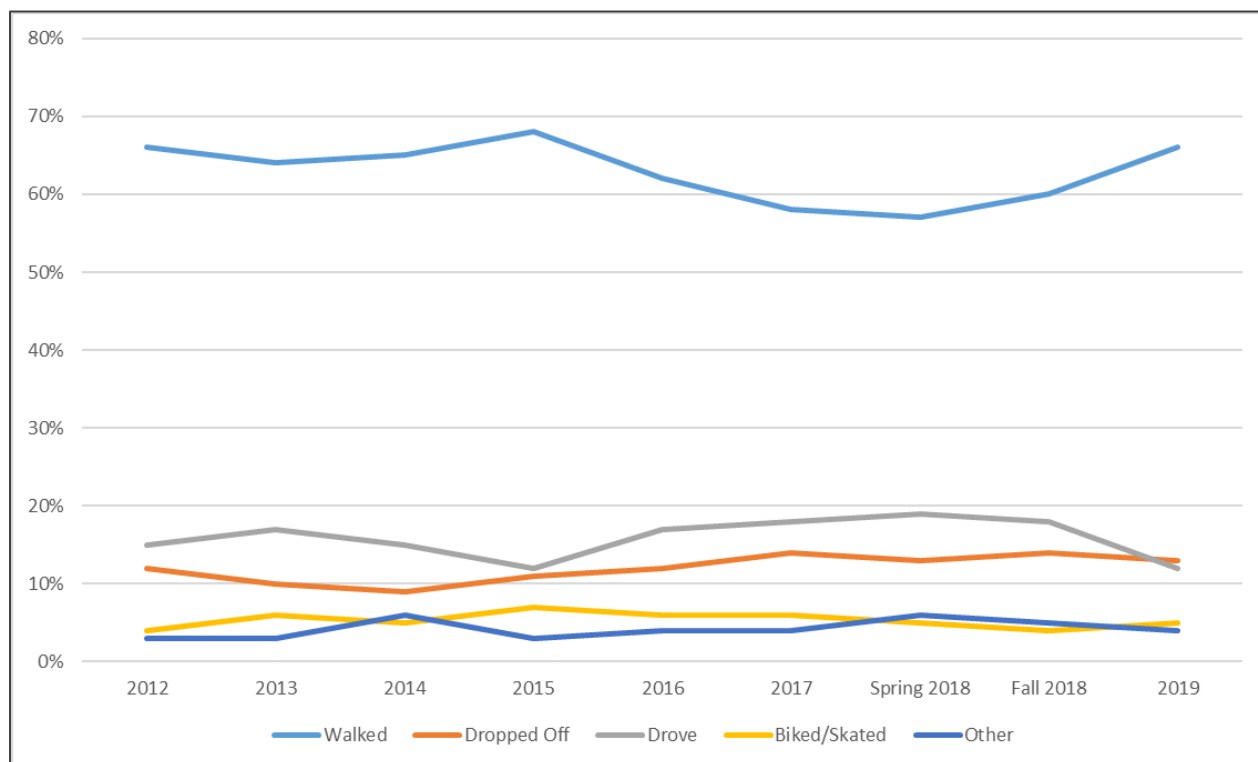
Station Pick-Up/Drop-Off Activity

The *Metro Westside Purple Line Draft Environmental Impact Statement/Environmental Impact Report (EIS/EIR)* (2010) includes projected station boardings and mode of access for the future Wilshire/Rodeo Station. The EIS/EIR projects that 4,585 daily boardings will occur at the station in the year 2035 (Metro 2010, Table 5-3). Of those, two percent are projected to access the station by private vehicle (Metro 2010, Table 5-4). Since there will not be any vehicular parking for Purple Line passengers at the Wilshire/Rodeo Station, it is assumed that those accessing the station by private vehicle would be dropped off.

Assuming a total of 4,585 daily boardings and a drop-off rate of two percent, it is anticipated that approximately 90 passengers will be dropped off at the station throughout the day. If passengers who are dropped off are eventually picked up during their return trip, this number would double to 180 pick-up and drop-off trips per day. For the purposes of the loading analysis,

200 passengers per day were assumed to be picked-up or dropped-off at the station.

The emergence of transportation network companies (TNCs) has occurred since initial ridership projections were made. TNCs have allowed more passengers to access transit by getting picked up or dropped off at transit stations. However, as shown in Figure 3.12-3, the percent of riders being dropped off at Metro rail stations has stayed relatively consistent over the past seven years with approximately 12 percent dropped off in 2012 and 13 percent dropped off in 2019. Therefore, the mode of access estimates contained in the original EIR/EIS were not adjusted further.



Source: LA Metro Annual On-Board Customer Satisfaction Survey

Figure 3.12-3 Metro Rail Mode of Access (2012 to 2019)

Loading Capacity and Demand

The methodology developed by Fehr & Peers in the *San Francisco Curb Study* (Uber Technologies, 2018) was used to estimate the amount of curb space needed to accommodate pick-ups and drop-offs. The methodology is based on the recognition that the length of curb space needed for passenger pick-ups and drop-offs is influenced by the number of vehicles picking up/dropping off passengers, passenger vehicle length, and the specific pick-up and drop-off location (e.g., mid-block or adjacent to a driveway or intersection).

A passenger vehicle needs space to pull over from the travel lane to the curb, dwell along a curb while picking up or dropping off passengers, and then return into the travel lane. Given that standard passenger vehicles are typically between 15-17 feet long, a single passenger loading space would require 50 to 60 feet if placed between other parked vehicles or obstructions. When multiple vehicles are maneuvering to the curb for passenger pick-ups or drop-offs, each

event does not necessarily require the entire 50 to 60 feet. In addition, the amount of curb space needed can further be reduced by placing loading zones before or after driveways or intersections. At these locations, the entry and exit distances can be through zones where parked vehicles or other obstructions would not be expected. As such, the total space needed would be reduced by approximately 20 feet.

The equation used to estimate the amount of curb space needed can be expressed as:

$$\text{Curb Space Needed} = A + n * (B + C)$$

where A = entry length, B = vehicle envelope, C = exit length, and n = the number of vehicles in a pick-up/drop-off zone. Figure 3.12-4 illustrates the curb space required for a variety of passenger loading scenarios. If A, B, and C are each 20 feet, the amount of curb space required is:

- One Vehicle Loading Zone (next to driveway, intersection, bus stop) = 40 feet
- One Vehicle Loading Zone (midblock) = 60 feet
- Two Vehicle Loading Zone (next to driveway, intersection, bus stop) = 80 feet
- Two Vehicle Loading Zone (midblock) = 100 feet (~50 feet per vehicle)
- Three Vehicle Loading Zone (midblock) = 140 feet (~43 feet per vehicle)

The list above presents the vehicle capacity along a given length of curb space, which is effectively equal to the maximum simultaneous pick-up and drop-off events that could occur. The maximum number of peak hour curb events were calculated by extrapolating the maximum number of simultaneous curb events listed above. This analysis was performed using Fehr & Peers CurbSpace+ tool, which examines the relationship between peak hour and simultaneous curb events. This tool was developed based on data collected from over 600 individual TNC, taxi, and private vehicle pick-ups and drop-offs at five different locations in San Francisco observed in 2018.

Curb Space Demand

To calculate the number of peak hour curb events, peak hour percentages were applied to the total daily pick-up and drop-off estimate of 200 daily trips. A range of 10 percent to 20 percent of daily trips were assumed to occur during the peak hour. Total peak hour pick-ups and drop-offs were then evaluated with Fehr & Peers CurbSpace+ tool to calculate the maximum simultaneous curb events. The number of simultaneous curb events were then used to calculate the amount of curb space required to facilitate a maximum simultaneous curb event scenario.

Table 3.12-1 summarizes the amount of vehicle activity that could occur along pre-determined curb lengths. As shown, capacity is similar for curb lengths between 40 and 60 feet, as well as between 80 and 100 feet. The ability to accommodate additional curb activity increases when 140 feet in curb space is provided. It should be noted that the capacities below assume a continuous section of curb. Smaller sections that total each of the possible curb lengths would have less ability to accommodate pick-up and drop-off activity.

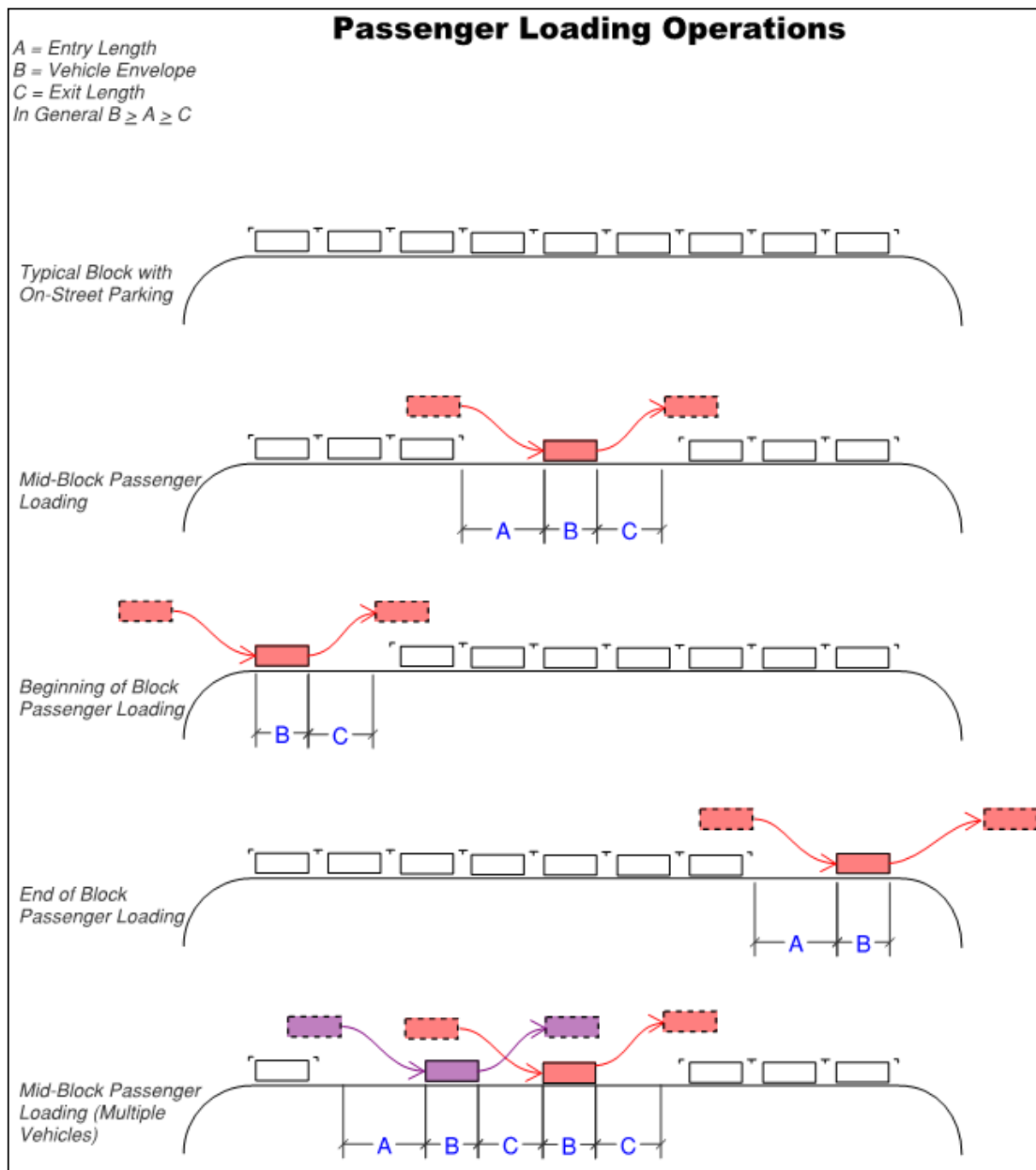


Figure 3.12-4 Typical Passenger Loading Operations

Table 3.12-1 Typical Curb Space Capacities

Curb Space Available (feet)	Curb Space Location	Vehicle Capacity	Max Simultaneous Curb Events	Max Peak Hour Curb Events
40	Next to driveway, intersection, bus stop)	1	1	6
60	Midblock	1	1	6
80	Next to driveway, intersection, bus stop)	2	2	23
100	Midblock	2	2	23
140	Midblock	3	3	60

Table 3.12-2 summarizes the number of anticipated simultaneous curb events and amount of curb space that would be required to accommodate such activity. As shown below, between two to three curb events are expected to occur simultaneously. Therefore, approximately 100 to 140 feet of curb would be needed to accommodate anticipated passenger pick-up and drop-off activity. However, if an equal number of pick-ups and drop-offs occur by vehicles traveling both northbound and southbound, it is estimated that 1 to 1.5 curb events would occur simultaneously in each direction. Given this, it is assumed that space for a total of four (two northbound and two southbound) curb events should be provided near the North Portal. As such, approximately 80 to 100 feet of curb would be needed to accommodate anticipated passenger pick-up and drop-off activity in both travel directions. The specific amount of curb space required would be dependent on the location of the loading zone (e.g. next to driveway or midblock).

Table 3.12-2 Projected Curb Space Needed

Passengers Accessing the Station via Pick-up/Drop-Off (daily)	Peak Hour %		Peak Hour Curb Events		Max Simultaneous Curb Events		Curb Space Required (feet)	
	Min	Max	Min	Max	Min	Max	Min	Max
Total: 200	10%	20%	21	43	2	3	100	140
NB: 100	-	-	-	-	-	2	80	100
SB: 100	-	-	-	-	-	2	80	100
Source: Fehr & Peers, 2020								

Roadway Configurations and On-Street Parking with North Portal

Table 3.12-3 below summarizes the roadway configurations and on-street parking inventory that would be available for the Project and Project Alternatives prior to implementing any loading zones. As shown, all on-street parking, including bus loading, would be removed on North Beverly Drive between the Beverly Cañon Gardens mid-block crosswalk and Wilshire Boulevard with the Project. Similarly, all on-street parking, including valet operations, would be removed on North Cañon Drive between Clifton Way and Wilshire Boulevard with the Cañon Drive-Half Portal Alternative. No parking would be removed with the Cañon Drive Staging Yard Alternative.

Table 3.12-3 Summary of Roadway Configurations and Available On-Street Parking

The Project and Alternatives	# of Lanes		On-Street Parking	
	Existing	With Portal	Existing	With Portal
The Project: N. Beverly Drive south of Beverly Cañon Gardens mid-block crosswalk	NB: 2 lanes SB: 2 lanes	NB: 2 lanes SB: 2 lanes	NB: 6 stalls + Bus loading SB: 3 stalls	NB: No parking; No Bus loading SB: No parking (Potential for one space if sidewalk is narrowed)
Cañon Drive-Half Portal Alternative: N. Cañon Drive south of Clifton Way	NB: 2 lanes SB: 2 lanes	NB: 2 lanes SB: 2 lanes	NB: 8 stalls + valet parking SB: 3 stalls	NB: No parking; No valet operations SB: No parking (Potential for one space if sidewalk is narrowed)
Cañon Drive Staging Yard Alternative: N. Cañon Drive south of Clifton Way	NB: 2 lanes SB: 2 lanes	NB: 2 lanes SB: 2 lanes	NB: 8 stalls + valet parking SB: 3 stalls	NB: 8 stalls + valet parking SB: 3 stalls

The information presented in the above table does not include additional space that would be required for pick-up and drop-off operations. A summary of changes to on-street parking with the Project and Project Alternatives due to the additional potential parking loss needed to accommodate the pick-up and drop-off loading zones is provided in the following section.

Potential Pick-Up/Drop-Off Locations

Potential pick-up and drop-off locations were identified using station portal concept designs for the Project and Project Alternatives, and from locations identified during a site visit conducted in December 2019. Given that the most desirable location for pick-up and drop-off activities will be as close to the station as possible, curb spaces closest to the North Portal that could be converted to loading activity were identified for the Project and Project Alternatives.

The Project (Beverly Drive)

This section summarizes potential pick-up and drop-off locations for the Project. Potential pick-up and drop-off locations are shown on Figure 3.12-5.

With the Project, all on-street parking on both sides of the street and the bus loading zone on the east side of the street on North Beverly Drive between Wilshire Boulevard and the Beverly Cañon Gardens mid-block crosswalk would be removed. Given the minimal right-of-way available for loading activities immediately adjacent to the North Portal, pick-up and drop-off trips would need to occur north of the Beverly Cañon Gardens mid-block crossing adjacent to the existing businesses.

A total of two pick-up/drop-off spaces could be provided along northbound North Beverly Drive, just north of the Beverly Cañon Gardens crosswalk. However, providing space for pick-up and drop-off vehicles would require repurposing approximately 40 feet of existing red curb space and removing two on-street parking spaces (a minimum of 10 feet of red curb space would remain).

In the southbound direction on North Beverly Drive, a total of three parking spaces could be converted to a loading zone to accommodate pick-up and drop-off activity just north of the Beverly Cañon Gardens crosswalk. There is a potential to provide one pick-up/drop-off space just north of the station portal if the sidewalk is narrowed.

Cañon Drive-Half Portal Alternative

This section summarizes potential pick-up and drop-off locations for the Cañon Drive-Half Portal Alternative. Potential pick-up and drop-off locations are shown on Figure 3.12-6.

With the Cañon Drive-Half Portal Alternative, all on-street parking on both sides of North Cañon Drive between Wilshire Boulevard and Clifton Way would be removed. This would also result in the loss of the valet parking operations on the east side of North Cañon Drive that serves the adjacent restaurants. Given the minimal right-of-way available for loading activities immediately adjacent to the North Portal, pick-up and drop-off trips would need to occur on North Cañon Drive north of Clifton Way or on Clifton Way.

For vehicles traveling on northbound North Cañon Drive, two pick-up/drop-off spaces could be provided just north of Clifton Way; however, this would require removing two on-street parking spaces. Motorists performing pick-up and drop-off operations may utilize up to 45 feet of red curb space just north of Clifton Way when executing approach maneuvers but would not stop along the red curb space itself. Alternatively, a total of two pick-up/drop-off spaces could be provided along eastbound Clifton Way, just east of North Cañon Drive. This would require removing three on-street parking spaces. The valet parking zone on the east side of North Cañon Drive would need to be relocated.

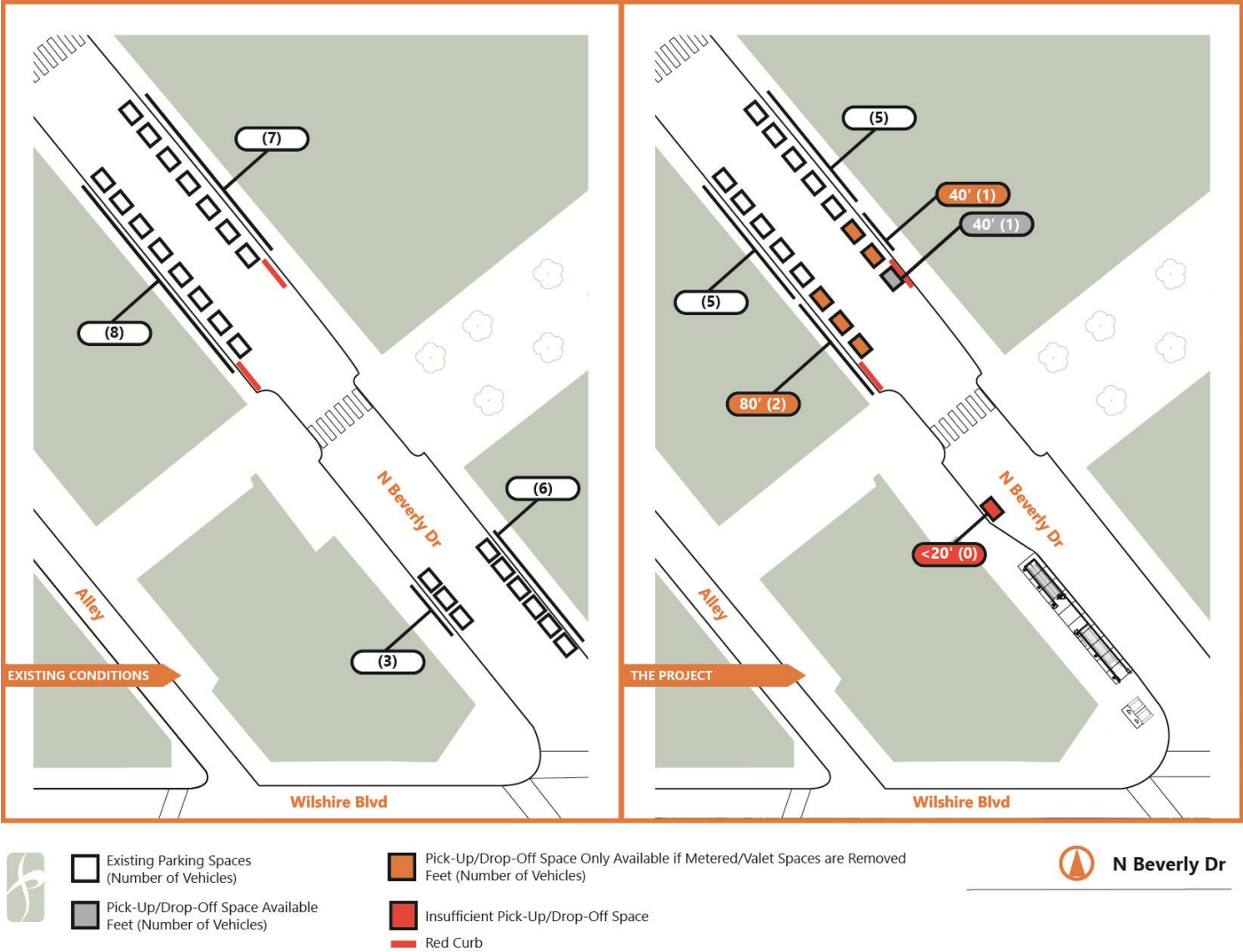


Figure 3.12-5 The Project (Beverly Drive) - Pick-Up/Drop-Off Evaluation

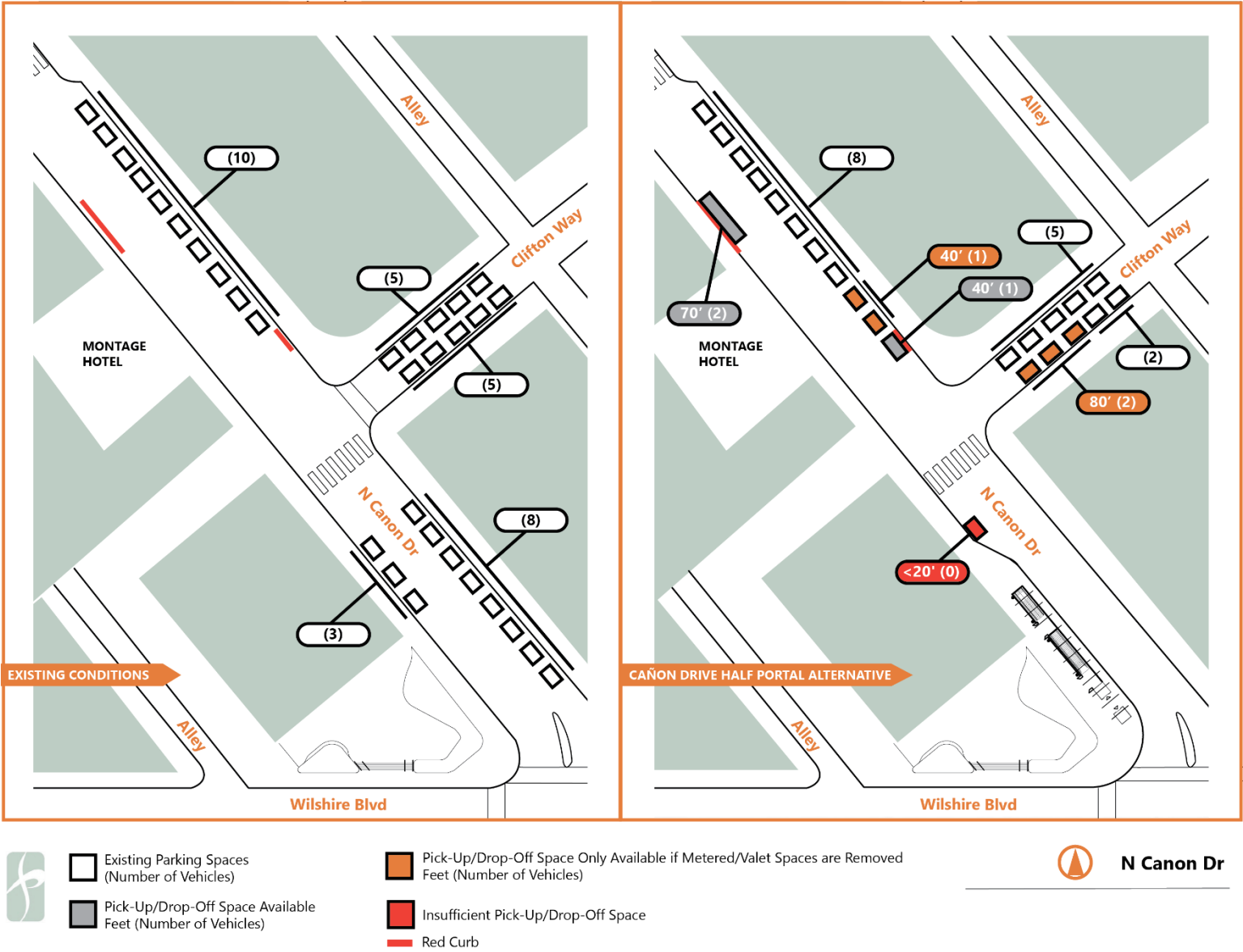


Figure 3.12-6 Cañon Drive-Half Portal Alternative - Pick-Up/Drop-Off Evaluation

Along southbound North Cañon Drive, there is space for two pick-up/drop-off spaces just north of the Montage Hotel, though it would require repurposing approximately 70 feet of red curb space (a minimum of 10 feet of red curb space would remain adjacent to the Montage Hotel driveway). There is a potential to provide one pick-up/drop-off space just north of the station portal if the sidewalk is narrowed. Providing space for pick-up and drop-off activity in this location would reduce the amount of red curb that would need to be repurposed north of Clifton Way adjacent to the Montage Hotel.

Cañon Drive Staging Yard Alternative

This section summarizes potential pick-up and drop-off locations for the Cañon Drive Staging Yard Alternative. For this Alternative, the lane configurations along North Cañon Drive would not change from existing conditions, and on-street parking spaces and valet operations would remain as is. Potential pick-up and drop-off locations are shown on Figure 3.12-7.

For vehicles traveling northbound, two pick-up/drop-off spaces could be provided along North Cañon Drive just north of Wilshire Boulevard. To accommodate the two pick-up/drop-off spaces, approximately 60 feet of red curb space would need to be repurposed and one on-street parking space would need to be removed (red curb clearance would be maintained at the intersection).

Along southbound North Cañon Drive, two pick-up/drop-off spaces could be provided just south of Clifton Way. This would require removing three on-street parking spaces.

To preserve all on-street parking on the east side of North Cañon Drive, vehicles traveling northbound could utilize one pick-up/drop-off space along North Crescent Drive, just north of Wilshire Boulevard. This would require repurposing approximately 40 feet of short-term metered green curb space.

Summary of Pick-Up/Drop-Off Evaluation

Due to the additional right-of-way needed to construct the Project and Project Alternatives, on-street parking would be removed on North Beverly Drive adjacent to the Project and on North Cañon Drive adjacent to the Cañon Drive-Half Portal Alternative resulting in limited opportunities for creating loading zones immediately adjacent to the North Portal if placed in these two locations. Table 3.12-4 summarizes the changes to on-street parking with the Project and Project Alternatives and the additional potential parking loss needed to accommodate the pick-up and drop-off loading zones. As shown, the Cañon Drive Staging Yard Alternative would have the least parking impacts.

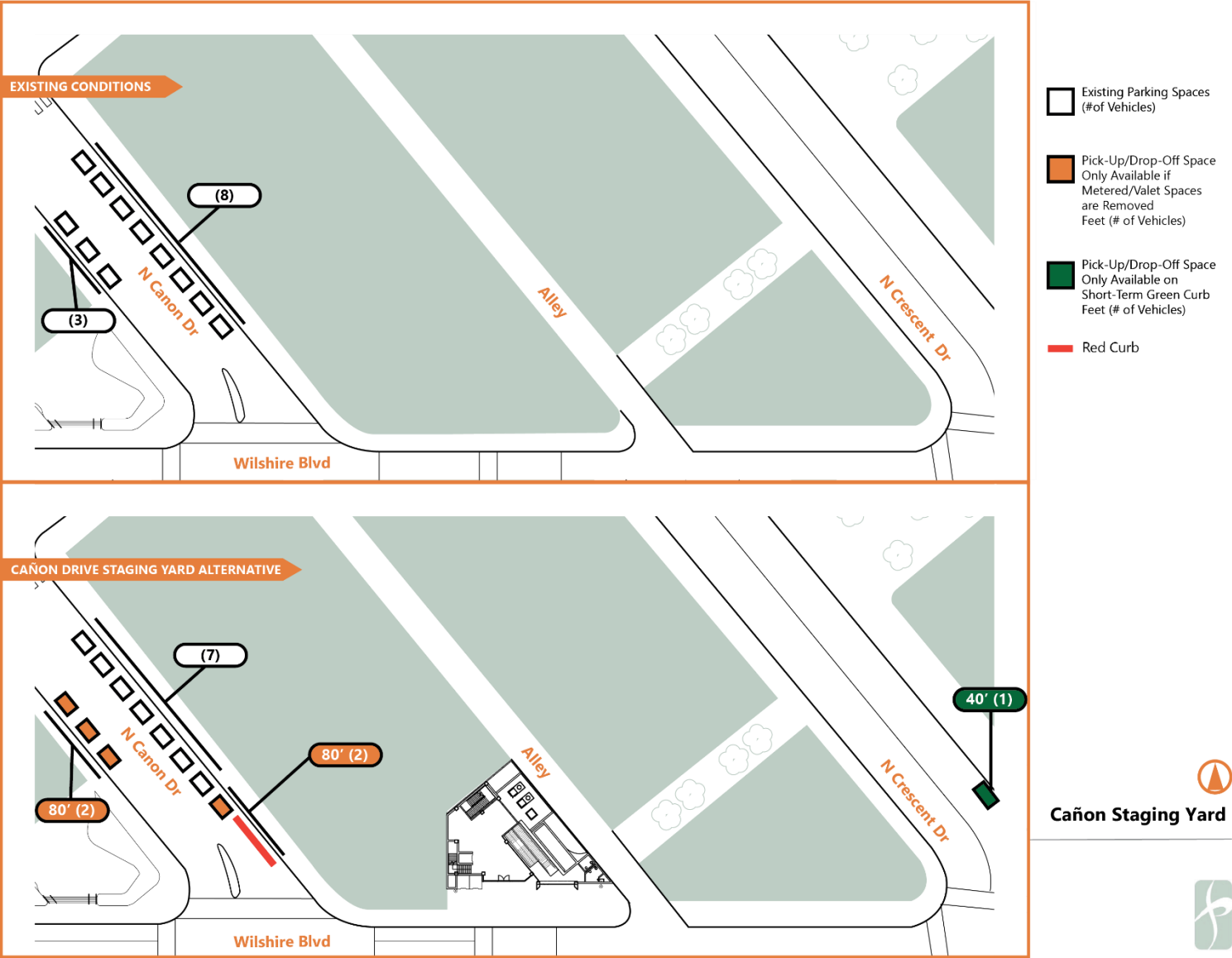


Figure 3.12-7 Cañon Drive Staging Yard Alternative – Pick-Up/Drop-Off

Table 3.12-4 On-Street Parking and Loading Summary

The Project and Alternatives	Existing Parking	Parking with Portal	Additional Parking Loss with Loading Zones
The Project: N. Beverly Drive south of Beverly Cañon Gardens mid-block crosswalk	NB: 6 stalls + Bus loading SB: 3 stalls	NB: No parking; No Bus loading SB: No parking (Potential for one space if sidewalk is narrowed)	<i>North of Crosswalk:</i> NB: Loss of 2 stalls SB: Loss of 3 stalls
Cañon Drive-Half Portal Alternative: N. Cañon Drive south of Clifton Way	NB: 8 stalls + valet parking SB: 3 stalls	NB: No parking; No valet operations SB: No parking (Potential for one space if sidewalk is narrowed)	<i>North of Crosswalk:</i> NB: Loss of 2 stalls <i>Clifton Way:</i> EB: Loss of 3 stalls
Cañon Drive Staging Yard Alternative: N. Cañon Drive south of Clifton Way	NB: 8 stalls + valet parking SB: 3 stalls	NB: No changes SB: No changes	NB: Loss of 1 stall SB: Loss of 3 stalls

3.13 Tribal Cultural Resources

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, Cañon Drive Staging Yard Alternative related to tribal cultural resources. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. This section also discusses how the Project and Project Alternatives would impact potential tribal cultural resources within the APE and proposed mitigation measures to reduce impacts, if needed.

3.13.1 Regulatory Setting

Federal

National Historic Preservation Act

The National Historic Preservation Act established the National Register of Historic Places (NRHP) to recognize resources associated with the country's history and heritage. Criteria for listing in the NRHP pursuant to Title 26, Part 63 of the Code of Federal Regulations are the following: significance in American history, architecture, archaeology, engineering, and culture as presented in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and that are (a) associated with events that have made a significant contribution to the broad patterns of our history; (b) associated with the lives of persons significant in our past; (c) embody the distinctive characteristics of a type, period, or method of construction, represent the work of a master, possess high artistic values, or represent a significant and distinguishable entity whose components may lack individual distinction; or (d) have yielded, or may be likely to yield information important to history or prehistory. Criterion (d) is usually reserved for archaeological resources. Properties eligible for the NRHP must be of sufficient age, be proven through scholarship to meet at least one of the significance criteria, and exhibit integrity of the features, elements, and/or informational value, which provides the property its documented historical or archaeological significance. Additionally, Section 101(d)(6)(A) of the National Historic Preservation Act allows properties of traditional religious and cultural importance to a tribe to be determined eligible for inclusion in the NRHP.

State

Assembly Bill 52

On September 25, 2014, Governor Jerry Brown signed into law Assembly Bill (AB) 52. The intent of AB 52 is to "set forth a process and scope that clarifies California tribal government involvement in the CEQA process, including specific requirements and timing for lead agencies to consult with tribes on avoiding or mitigating impacts to tribal cultural resources." It applies to projects that require an EIR or a Negative Declaration/Mitigated Negative Declaration.

AB 52 defines tribal cultural resources, amended Appendix G of CEQA Guidelines to include a separate section for tribal cultural resources, and created a formal requirement for consultation with California Native American Tribes in the CEQA process. Pursuant to PRC Section 21080.3.2, Tribal Governments can request consultation with a lead agency and give input regarding potential impacts to tribal cultural resources before the agency decides what type of

environmental review is necessary for a project. The PRC further requires avoiding damage to tribal cultural resources, if feasible. If not, lead agencies must mitigate impacts to tribal cultural resources to the extent feasible.

Section 21074 of the PRC defines “tribal cultural resources” as a resource that is either of the following:

1. Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:
 - a. Included or determined to be eligible for inclusion in the California Register of Historical Resources.
 - b. Included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.
2. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Section 5024.1. In applying the criteria set forth in subdivision (c) of Section 5024.1 for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.
 - b. A cultural landscape that meets the criteria of subdivision (a) is a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape.
 - c. A historical resource described in Section 21084.1, a unique archaeological resource as defined in subdivision (g) of Section 21083.2, or a “nonunique archaeological resource” as defined in subdivision (h) of Section 21083.2 may also be a tribal cultural resource if it conforms with the criteria of subdivision (a).

California Register of Historical Resources

The California Register of Historical Resources (CRHR) was created to identify historical resources deemed worthy of preservation on a state level and was modeled closely after the NRHP. The criteria are nearly identical to those of the NRHP but focus on resources of statewide, rather than national, significance. The CRHR automatically includes any resource listed, or formally designated as eligible for listing in the NRHP, including tribal resources. The State Historic Preservation Officer maintains the CRHR, which may also include properties designated under local ordinance or identified through local historical resources surveys that meet CRHR eligibility criteria.

California Health and Safety Code

California Health and Safety Code Section 7050.5, and PRC Sections 5097.94 and 5097.98 outline procedures to be followed in the event human remains are discovered during the course of California projects. If human remains are encountered, all work must stop at that location and the County Coroner must be immediately notified and advised of the finding. The County Coroner would investigate “the manner and cause of any death” and make recommendations concerning treatment of the human remains. The County Coroner must make their determination within 2 working days of being notified. If the human remains are determined to

be Native American, the County Coroner shall contact the California Native American Heritage Commission. The Commission would in turn "...immediately notify those persons it believes to be most likely descended from the deceased Native American." The descendants would then inspect the site and make recommendations for the disposition of the discovered human remains. This recommendation from the most likely descendants may include the scientific analysis of the remains and associated items.

Local

City of Beverly Hills General Plan

The City of Beverly Hills General Plan, amended on January 12, 2010, provides a comprehensive framework that guides the City's development through 2025. The Historic Preservation Element of the General Plan outlines goals and policies for the protection of historical and archaeological resources. Goal HP-1.8 is designed to protect prehistoric and historic archaeological resources: "Temporarily suspend all earth disturbing activity within 100-feet of a potential resource, if any such resources are discovered during construction-related earth-moving activities, to assess the significance of the find, and require appropriate mitigation before work resumes."

3.13.2 Methodology and CEQA Thresholds

Methodology

The following sections discuss the delineation of the study area and research, field survey, identification, and evaluation methodology for the Project and Project Alternatives. The cultural resources studies were conducted by cultural resources specialists who meet the Secretary of the Interior's Professional Qualifications Standards (36 CFR Part 61) in Archaeology and Architectural History.

Area of Potential Effects

For tribal cultural and archaeological resources, the APE consists of the area of direct impact, which consists of the three-dimensional area of potential ground disturbance for the Project and Project Alternatives, including all staging areas and other areas of temporary impact.

Archival Research and Ethnographic Study

An archival records search was conducted at the SCCIC of the California Historical Resources Information System (CHRIS) at California State University, Fullerton on July 9, 2019. The search provided information related to previously conducted cultural resource investigations and records of known cultural resources. The records search included information within a 1-mile radius of the Project and Project Alternatives for archaeological resources and a 0.5-mile radius of the Project and Project Alternatives for historic built resources. The results of the records search are discussed in Section 3.4, Cultural Resources. No resources of Native American origin were identified within a 1-mile radius of the Project and Project Alternatives.

A background ethnographic study conducted for the Project consisted of consulting ethnographic maps and standard ethnographic works for California Native American tribes that have historically occupied the area within 1 mile of the Project and Project Alternatives. No

potential tribal cultural resources were identified in the area within 1 mile of the Project and Project Alternatives during this background study.

Field Survey

Cultural resources specialists conducted a reconnaissance cultural resources survey of the APE on December 9, 2019, noting and photographing any potential cultural resources for recordation. Previously recorded cultural resources were also revisited. No archaeological materials were observed, and no resources of Native American origin were identified during the field survey.

Sacred Land Files Search and Native American Contact Program

A Native American Sacred Lands File search and contact program were conducted to inform interested parties of the Project and Project Alternatives and to request any information that may indicate an impact to cultural resources located within or adjacent to Project and Project Alternatives. The program involved contacting Native American representatives provided by the Native American Heritage Commission (NAHC) and individuals and groups known to have knowledge about the area within or adjacent to the Project and Project Alternatives, in order to solicit comments and concerns regarding the Project and Project Alternatives.

A letter was prepared and mailed to the NAHC on October 8, 2019. The letter requested that a Sacred Lands File check be conducted for the Project and Project Alternatives and that contact information be provided for Native American groups or individuals that may have concerns about cultural resources in the area within or adjacent to the Project and Project Alternatives. The NAHC responded with a letter dated October 23, 2019, which stated that the Sacred Lands File check was positive and included a list of tribes culturally affiliated with the area within or adjacent to the Project and Project Alternatives who may have information that could be utilized. Representatives for these tribes were then subsequently contacted with a letter that contained information regarding the Project and Project Alternatives and their geographical location. The purpose of the Sacred Lands File check and Native American contact was to identify Native American sacred sites and potential tribal cultural resources located within or adjacent to the Project and Project Alternatives. Both the NAHC and tribal representatives contacted indicated that the area within or adjacent to the Project and Project Alternatives is sensitive for potential tribal cultural resources. More details of the Native American contact program and related information are located in Confidential Appendix F of this EIR.

Assembly Bill 52

On November 22, 2019, letters were sent to each of the five Native American tribal representatives identified by the NAHC describing the Project and Project Alternatives and requesting a response. Two Native American tribal representatives requested consultation with the City per AB 52: Chairperson Andrew Salas of the Gabrieleno Band of Mission Indians—Kizh Nation and Adrian Morales, Tribal Consultations Lead for the Gabrieleno/Tongva San Gabriel Band of Mission Indians. In addition, Chairperson Robert Dorame of the Gabrielino Tongva Indians of California Tribal Council expressed interest in the Project and recommended Native American monitoring. Per AB 52, the City attempted to schedule consultation meetings with each tribal representative. The purpose of the consultation is to ascertain any specific information regarding the sensitivity of the area within or adjacent to the Project and Project Alternatives and recommendations for reducing or eliminating potential impacts to tribal cultural resources, if any. On March 13, 2020, the City consulted with the Gabrieleno Band of Mission

Indians—Kizh Nation and the tribal representative indicated that the Wilshire Corridor (including the Project and Project Alternatives area) is highly sensitive for tribal cultural resources. The tribal representative and the City discussed strategies to reduce potential impacts to tribal cultural resources, which have been incorporated into the analysis within this section.

CEQA Thresholds

An impact is considered significant if the project would:

1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

3.13.3 Existing Conditions

Historical Context

Prehistoric Setting

Southern California is known to have been inhabited by native peoples at least 13,000 years Before Present (B.P.) (Arnold et al. 2004). The first evidence of human occupation in the Los Angeles area dates to at least 9000 B.P. and is associated with a period known as the Millingstone Cultural Horizon (Wallace 1955; Warren 1968). Millingstone populations established permanent settlements that were located primarily on the coast and in the vicinity of estuaries, lagoons, lakes, streams, and marshes where a variety of resources, including seeds, fish, shellfish, small mammals, and birds, were exploited. Early Millingstone occupations are typically identified by the presence of handstones (manos) and millingstones (metates), while those Millingstone occupations dating after 5000 B.P. contain a mortar and pestle complex as well, signifying the exploitation of acorns in the region.

Although many aspects of Millingstone culture persisted, by 3500 B.P., a number of socioeconomic changes occurred that are associated with the period known as the Intermediate Horizon (Erlandson 1994; Wallace 1955; Warren 1968). Increasing population size required new technological innovations, such as the circular shell fishhook, the mortar and pestle, and dart and atlatl, to maximize extraction of terrestrial and marine resources, resulting in a more diverse hunting capability (Erlandson 1994). The Intermediate Horizon marks a period in which specialization in labor emerged, trading networks became an increasingly important means by which both utilitarian and non-utilitarian materials were acquired, and travel routes were extended.

The Late Prehistoric period, spanning from approximately 1500 B.P. to the Spanish mission era, is the period associated with the florescence of contemporary Native American groups. Gabrielino villages were reported to have been most abundant near the Los Angeles River in the area north of downtown Los Angeles, known as the Glendale Narrows, and those areas along the river's various outlets into the sea, including San Pedro Bay (Gumprecht 1999). Early explorers such as the Cabrillo Expedition visited the bay in 1542, marking the first known incursion by Europeans into what is today Los Angeles County.

Historic Setting

The first European exploration of what is today the city of Beverly Hills occurred in August 1769, when Governor Gaspar de Portolá traversed the area while exploring the region between San Diego and a planned new settlement at Monterey. The party camped in the vicinity of modern Beverly Hills on August 3 and met many Native Americans in the area. In 1771, Mission San Gabriel Arcángel was established by Spanish missionaries along the Rio Hondo River in what is now Whittier Narrows (McCawley 1996:189). European diseases devastated the Gabrielino population, and by the early 1800s, the majority of the surviving Gabrielino population had entered the mission system. This lifestyle change brought major consequences for Gabrielino cultural integrity. In the 1830s, the secularization of the mission system, the rise of private ranching, the increase in the local population, and the growth of local retail businesses caused more changes to the economic landscape of Los Angeles County.

In 1838, Governor Pío de Jesús Pico granted 4,539 acres, including the land currently occupied by the city of Beverly Hills, to Maria Rita Valdez as Rancho Rodeo de las Aguas. Valdez sold the property to Henry Hancock and Benjamin Wilson in 1854. The rancho passed through a series of hands until 1871, when the land was purchased by Henry Hammel and Andrew H. Denker, managers of the United States Hotel, who intended to subdivide the land. However, it was not until early in 1906 that the land on which Beverly Hills is now located was sold to the Rodeo Land & Water Company. On November 14, 1906, a plat of the new subdivision known as Beverly was recorded, covering land bounded by Wilshire and Santa Monica Boulevards. The street names Beverly, Cañon, and Crescent first appear on this plat (Robinson 1939:169).

Efforts to create the present community of Beverly Hills finally succeeded in 1907. Even then, the pace of development was leisurely, picking up only after the construction of the Beverly Hills Hotel in 1911, with the real boom in development not occurring until the decade of the 1920s. Settled initially by magnates and businesspeople such as oilmen Kirk B. Johnson and Max Whittier, Beverly Hills found itself synonymous with "hometown to the stars" after Douglas Fairbanks and Mary Pickford took up residence at Pickfair in 1920. Many other entertainment industry figures followed during the succeeding decades. In the 1930s and 1940s, the retail district of Beverly Hills began to compete with the Miracle Mile district in Hollywood, and newly developed Westwood Village for the title of the most fashionable shopping district in metropolitan Los Angeles. In the post-World War II era, the city's downtown became an important center for professional and business offices as well (City of Beverly Hills 1986).

3.13.4 Impact Evaluation

Impact TCR-1. Cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k).

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to tribal cultural resources as a result of the Purple Line Extension Project were evaluated in a separate environmental review process. Therefore, no impacts would occur related to tribal cultural resources that are listed or eligible for listing in the CRHR, or in a local register of historical resources.

The Project and Project Alternatives

Construction Impacts

Construction of the Project and Project Alternatives would include earth-disturbing activities, such as excavation, within the public rights-of-way (ROW) and at the staging yard site. No previously identified archaeological resources associated with Native American culture that are listed or eligible for listing in the NRHP, CRHR, or local register have been identified within a 1-mile radius of the APE, and no tribal cultural resources were identified in the archival research and outreach.

As discussed in Section 3.4 Cultural Resources, there are three historical resources within the APE: the Wilshire Beverly Center (Chase Bank), California Bank Building (Sterling Plaza), and the Beverly Hills Financial Center. The Wilshire Beverly Center and California Bank Building were both previously found eligible for the NRHP under Criterion C and the CRHR under Criterion 3, and therefore meet the definition of a historical resource under CEQA. The Beverly Hills Financial Center is eligible for the CRHR under Criterion 3 and also meets the definition of a historical resource under CEQA. However, none of these resources are considered a tribal cultural resource, as defined by PRC Section 21074. The Project and Project Alternatives would not impact any known tribal cultural resources. Therefore, construction impacts related to tribal cultural resources that are listed or eligible for listing in the CRHR, or in a local register of historical resources would be less than significant.

Operational Impacts

The Project and Project Alternatives would operate as a station portal on the north side of Wilshire Boulevard, and no ground-disturbing activities occurring during operations. As previously mentioned, no listed or eligible for listing tribal cultural resources were found to exist within or adjacent to the APE. Therefore, no operational impacts would occur related to tribal cultural resources that are listed or eligible for listing in the CRHR, or in a local register of historical resources.

Impact TCR-2. Cause a substantial adverse change in the significance of a tribal cultural resource that is determined to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to tribal cultural resources as a result of the Purple Line Extension Project were evaluated in a separate environmental review process. Therefore, no impacts would occur related to tribal cultural resources that are a significant resource determined by the lead agency.

The Project and Project Alternatives

Construction Impacts

Construction of the Project and Project Alternatives would include earth-disturbing activities, such as excavation, within the public ROW and at the staging yard site. As previously discussed, Native American tribes and others may have resided in the vicinity of Beverly Hills. These groups of people and their activities may have left archaeological traces. However, the APE was developed between 1945 and 1975 when a large number of medium- to large-scale office buildings were erected along the commercial corridors of Beverly Hills, including Wilshire Boulevard.

Though no previously identified archaeological resources associated with Native American culture have been identified within a 1-mile radius of the APE, and no tribal cultural resources were identified in the archival research and outreach, both the NAHC and Native American representatives contacted for the Project indicated that the area is sensitive for potential tribal cultural resources. Mitigation Measures TCR-A and TCR-B would be implemented to protect unknown tribal cultural resources that could be encountered during construction of the Project and Project Alternatives by retaining a Native American Monitor and providing the appropriate process for identifying discovered tribal cultural resources. With implementation of Mitigation Measures TCR-A and TCR-B, construction impacts related to tribal cultural resources that are a significant resource determined by the lead agency would be less than significant.

Operational Impacts

The Project and Project Alternatives would operate as a station portal on the north side of Wilshire Boulevard, and no ground-disturbing activities would occur during operations. As previously mentioned, no tribal cultural resources were found to exist within or adjacent to the APE. Therefore, no operational impacts would occur related to tribal cultural resources that are a significant resource determined by the lead agency.

3.13.5 Mitigation Measures

Project and Project Alternatives

TCR-A Retain a Native American Monitor

A Native American monitor who is ancestrally affiliated with the project area shall be retained by the lead agency or owner of the project to be on site to monitor all project-related, ground-disturbing construction activities (i.e., boring, grading, excavation, potholing, trenching, etc.). A monitor associated with one of the Tribal governments which have commented on the project shall provide the Native American monitor. The Native American monitor shall be required to maintain documentation of activities monitored and daily finds that shall be kept confidential by the Principal Archaeologists but which may be shared on request with Native American tribal governments recognized by the Native American Heritage Commission of the State of California.

TCR-B Unanticipated Discovery of Tribal Cultural Resources

In the event the Native American or archaeological monitor identifies a potential tribal cultural resource, the monitor shall be given the authority to temporarily halt construction within 50 feet of the discovery and to contact the qualified or Principal Archaeologist. Construction activities can continue in areas more than 50 feet (15 meters) away from the find. The qualified or Principal Archaeologist shall investigate the find and recommend whether it is eligible for inclusion in the CRHR. Additional work such as archaeological testing may be required to make this recommendation. Tribal governments that have commented on the project will be apprised of the findings. The lead agency, in consultation with interested tribes and with the input of the qualified archaeologist, shall determine whether the resource is a tribal cultural resource under CEQA and significant. If the discovery is determined to be a significant tribal cultural resource, the lead agency shall consult with interested tribal governments in order to determine an avoidance or treatment strategy.

3.13.6 Impacts after Mitigation

Implementation of Mitigation Measures TCR-A and TCR-B would ensure that potential construction impacts related to tribal cultural resources that are listed or eligible for listing in the CRHR or in a local register of historical resources, or a significant resource determined by the lead agency, would be less than significant for the Project and Project Alternatives.

3.13.7 Cumulative Impacts

No Project Alternative

Related projects identified within approximately 1 mile of the Project and Project Alternatives generally include commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning tribal cultural resources.

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Section 2 of the Purple Line Extension Project and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to tribal cultural resources were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulatively considerable impact related to tribal cultural resources.

The Project and Project Alternatives

Construction Impacts

The Project and Project Alternatives would not impact any known tribal cultural resources; however, implementation of Mitigation Measures TCR-A and TCR-B would ensure impacts to unknown resources would be less than significant. Impacts for the Project and Project Alternatives would be localized and minimized and, as such, would not contribute to a cumulatively considerable construction impact related to tribal cultural resources.

Operational Impacts

The Project and Project Alternatives would not impact tribal cultural resources during operations as discussed in the analysis above. As such, the Project and Project Alternatives would not contribute to a cumulatively considerable operational impact related to tribal cultural resources.

3.14 Utilities/Service Systems

This section presents baseline conditions and analyzes the potential impacts of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative related to utilities and service systems. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. The applicable laws, regulations, and methods used to determine the effects of the Project and Project Alternatives are described herein. The section describes the affected environment and analyzes the environmental consequences of the Project and Project Alternatives and, if applicable, provides mitigation measures.

3.14.1 Regulatory Setting

Federal

Resource Conservation and Recovery Act

Volume 40 of the Code of Federal Regulations, Part 258 (Resource Conservation and Recovery Act [RCRA, Subtitle D]) contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design, groundwater monitoring, and closure of landfills.

Clean Water Act

The CWA establishes regulatory requirements for potable water supplies including raw and treated water quality criteria. The City of Beverly Hills is required to monitor water quality and conform to the regulatory requirements of the CWA. The federal Safe Drinking Water Act (SDWA) establishes standards for contaminants in drinking water supplies. Maximum contaminant levels and treatment techniques are established for each of the contaminants. The listed contaminants include metals, nitrates, asbestos, total dissolved solids, and microbes.

National Pollutant Discharge Elimination System (NPDES) Program

Phase I of the National Pollutant Discharge Elimination System (NPDES) Program addresses stormwater runoff from “medium” and “large” municipal separate storm sewer systems (MS4s) generally serving populations of 100,000 or greater; construction activities disturbing 5 acres of land or greater; and ten categories of industrial activities. With respect to the disturbance of 5 acres of land or greater from construction activities, the SWRCB issued one statewide General Construction Activity Stormwater Permit (on August 20, 1992) to apply to all construction activities. Landowners are responsible for obtaining and complying with the permit but may delegate specific duties to developers and contractors by mutual consent. For construction activities, the permit requires landowners, or their designated agent, to:

- Eliminate or reduce non-stormwater discharges to stormwater systems and other waters of the United States.
- Develop and implement a Stormwater Pollution Prevention Plan.
- Perform inspections of stormwater control structures and pollution prevention measures.

A Stormwater Pollution Prevention Plan (SWPPP) prepared in compliance with the Permit describes the site, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of postconstruction sediment and erosion control measures and maintenance responsibilities, and non-stormwater management controls. Dischargers are also required to inspect construction sites before and after storms to identify stormwater discharge from construction activity, and to identify and implement controls where necessary.

Telecommunications Act of 1996

The Telecommunications Act of 1996 was enacted to promote competition and reduce regulation in order to secure lower prices and higher quality services for telecommunication consumers and encourage the rapid deployment of new telecommunication technologies.

State

Integrated Waste Management Act of 1989 (AB 939)

In 1989, the Legislature adopted the California Integrated Waste Management Act of 1989 (AB 939), which established an integrated waste management hierarchy that consists of the following in order of importance: source reduction, recycling, composting, and land disposal of solid waste. The law also required that each county prepare a new Integrated Waste Management Plan and that each city prepare a Source Reduction and Recycling Element (SRRE) by July 1, 1991. AB 939 also requires cities and counties to prepare SRREs in their General Plans.

SB 2202 made a number of changes to the municipal solid waste diversion requirements under the Integrated Waste Management Act. These changes included a revision to the statutory requirement for 50 percent diversion of solid waste to clarify that local governments shall continue to divert 50 percent of all solid waste on and after January 1, 2000. The City of Beverly Hills has achieved this reduction through recycling and collection of green waste.

California Safe Drinking Water Act

California enacted its own Safe Drinking Water Act (SDWA). The California Department of Health Services (DHS) has been granted primary enforcement responsibility for the SDWA. Title 22 of the California Administrative Code establishes DHS authority and stipulates drinking water quality and monitoring standards. These standards are equal to or more stringent than federal standards.

The Urban Water Management Planning Act (UWMPA) was also developed due to concerns for potential water supply shortages throughout the state of California. It requires information on water supply reliability and water use efficiency measures. Urban water suppliers are required, as part of the UWMPA, to develop and implement plans to describe their efforts to promote efficient use and management of water resources (City of Beverly Hills 2015).

California State Water Resources Control Board (SWRCB)

Responsibility for the protection of water quality in California rests with the SWRCB and nine Regional Water Resources Control Boards (RWQCBs). The SWRCB establishes statewide policies and regulations for the implementation of water quality control programs mandated by federal and state water quality statutes and regulations. The RWQCBs develop and implement

Water Quality Control Plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. The City of Beverly Hills lies within the Los Angeles RWQCB's (LARWQCB) jurisdiction, which regulates surface water quality in the Planning Area. The LARWQCB prepared a Basin Plan (water quality objectives for major drainage areas containing numerous local watersheds) that establishes implementation programs to protect beneficial uses of water and sets standards to prevent wastewater discharges that degrade water quality to the point where beneficial uses would be adversely affected.

California Public Utilities Commission (CPUC) Decision 95-08-038

California Public Utilities Commission (CPUC) Decision 95-08-038 contains the rules for the planning and construction of new transmission facilities, distribution facilities, and substations. The Decision requires permits for the construction of certain power line facilities or substations if the voltages would exceed 50 kilovolts (kV) or the substation would require the acquisition of land or an increase in voltage rating above 50 kV. Distribution lines and substations with voltages less than 50 kV need not comply with this Decision; however, the utility must obtain any nondiscretionary local permits required for the construction and operation of these projects.

Regional and Local

City of Beverly Hills Municipal Code

The City of Beverly Hills regulates the collection and disposal of solid waste through Title 6, Article 4 of the Beverly Hills Municipal Code (BHMC). Article 4.5 regulates the commercial waste collection franchises separately. To ensure that the City meets the statutory obligations imposed by AB 939, Title 9, Chapter 1 authorizes the City's Department of Building and Safety to impose and enforce requirements related to the salvaging, recycling, and reuse of construction and demolition debris.

Title 6 of the BHMC regulates the construction and operation of wastewater systems and the discharge of wastewater into the City's wastewater system, provides the method of imposing wastewater charges, and facilitates regulations for the wastewater system that are mandated by the USEPA and the state of California.

Section 6-1.2 of the BHMC establishes regulations for the administration of water services in the City. In compliance with Government Code Section 10631, parts (c) and (d), the City has also provided alternative water conservation measures. As a long-term goal, the City maintains a Water Conservation Program, Water Conservation Ordinance, and Efficient Landscaping Ordinance to achieve and maintain a high level of efficiency in water uses in the City's service area. Specific programs include leak reporting and repairs, valve maintenance program, system operation monitoring, meter replacement program, leak detection program, rate structure, rate management, flagging of unusual meter reads, test and repair program (pressure regulating valves), landscape irrigation, and public information program (City of Beverly Hills 2015).

Title 9 of the BHMC governs industrial and commercial construction activities and stormwater and non-stormwater discharge. Construction activities must implement appropriate BMPs and adhere to the applicable NPDES permit(s).

The City has adopted the Uniform Solar Energy Code, which was first developed in 1976 and published by the International Association of Plumbing and Mechanical Officials to address the growing needs of commercial and residential users of solar energy. This code is intended to provide a safe and functional solar energy system with minimum regulation.

The BHMC Title 6, Chapter 3, Antennas for Telecommunications Services, adopts rules and regulations to govern the operations of community antenna television systems in the City. It ensures consistency with federal law while promoting public health, safety, comfort, convenience, and general welfare of the City's residents; to enhance the aesthetic quality and appearance of the City by maintaining architectural and structural integrity; and by protecting views and vistas from obtrusive and unsightly accessory uses and facilities.

Los Angeles Regional Water Quality Control Board NPDES Permitting

Municipal and industrial discharges to regulated surface waters from and within the City of Beverly Hills require an NPDES permit from the LARWQCB. NPDES permits are required for operators of MS4s, construction projects, and industrial facilities. These permits contain limits on the amount of pollutants that can be contained in each facility's discharge.

3.14.2 Methodology and CEQA Thresholds

Methodology

The State CEQA Guidelines §15126.2 determines that in assessing the environmental impact of a proposed project, the lead agency should normally limit the examination of impacts to the existing physical conditions in the affected area as they exist at the time the notice of preparation is published. The examination should also include a discussion of relevant resource topic specifics within the affected area.

The City of Beverly Hills Public Works Department provides the following utility services: solid waste, water, wastewater, and stormwater. Southern California Edison (SCE) supplies electricity and the Southern California Gas Company (SCG) provides gas to the City of Beverly Hills. Telecommunication services are offered by various private telephone and internet service providers.

In determining impacts to utilities, data were incorporated from the City of Beverly Hills General Plan and Technical Background Reports, the BHMC, the Metro Westside Subway Extension Final EIS/EIR, Los Angeles County Public Works Ballona Creek Watershed Management Plan, and SCE and SCG websites.

CEQA Thresholds

An impact is considered significant if the project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects;
2. Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years;
3. Result in a determination by the waste water 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;

4. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; and/or
5. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

3.14.3 Existing Conditions

Solid Waste

The City's Public Works Department Solid Waste Division collects mixed waste (trash and recyclables) from all single-family residential areas, and all multi-family residential buildings that do not have trash chute bin service in subterranean parking structures. The City also collects all mixed waste and green waste left out by residents from all areas of the City and hauls the refuse to a material recovery facility in Sun Valley, California for processing. All commercial waste is collected by the City's franchise contractor and is hauled and processed at the material recovery facility in Sun Valley.

The City provides solid waste disposal including alley and curbside collection, recycling, and hazardous waste collections. Recyclables are sorted by the City and any composting solid waste is collected and sent to a composting facility. This new sorting system has enabled the City to meet and exceed the state mandated 50 percent diversion of waste from landfills and in 2018 the City's overall diversion rate was 60 percent.

The disposal of solid waste also occurs at either Sunshine Canyon Landfill or the Calabasas Sanitary Landfill. Combined, these landfills are permitted to receive 15,600 tons per day. The Calabasas Sanitary Landfill is anticipated to operate through 2025 and the Sunshine Canyon Landfill is anticipated to operate through 2037. Landfills are rapidly running out of space for solid waste disposal and in the next few years garbage hauling costs are expected to increase from 17 to 55 dollars per ton (Los Angeles County Public Works 2020).

Water

Land use in the service area is largely residential and other uses include commercial, light industrial, and municipal. The service area is nearly fully developed and additional growth will largely come from redevelopment and densification within the residential and commercial areas. The capacity of the City's water supply sources is adequate to meet projected ultimate demands for the City's service area, and the City does not anticipate an increase in water usage that will exceed the current supply. The implementation of City water conservation ordinances and measures has dropped the total per-capita City water use 21.5 percent since 2005 (City of Beverly Hills 2015).

The SCAG population forecast for 2025 (38,040) varies only slightly from the population for 2000 (33,824). Historical water use data reveals that, over the last 22 years, the average day (AD) water use has been stable, varying between 10.4 million gallons per day (mgd) and 13.7 mgd, with a mean value of 12.2 mgd. Beverly Hills imports approximately 90 percent of its water from the Metropolitan Water District of Southern California (MWD) and approximately 10 percent is currently provided from local groundwater production wells. Residential water use has accounted for approximately 70 percent of total system water use. (City of Beverly Hills 2015).

The City opened a reverse osmosis water treatment plant (WTP) in April 2004. The WTP is subsidized by the MWD as part of the Groundwater Recovery Program (GRP) to enable member agencies to develop local groundwater supplies to reduce the demand on the SWP and the Colorado River. The WTP produces 2.7 mgd and is in the process of expansion to produce 5.4 mgd. The groundwater is processed, treated, and subsequently blended with water purchased from MWD and conveyed to the distribution system via a transmission main that connects it to the Sunset Reservoir (RBF 2003). All water used in the City is treated to potable standards.

The City has four groundwater wells, three in the Beverly Gardens Park and one in the Burton Way median. The groundwater is conveyed to the WTP through a transmission main owned and maintained by the City. There are currently ten reservoirs within the Beverly Hills water system, ranging in size from 1.0 million gallons (MG) to 19.4 MG, for a total volume of 40.2 MG. Five reservoirs are aboveground, circular steel tanks, and the others are buried or partially buried concrete reservoirs. The City's storage facilities serve multiple purposes, including flow equalization, fire reserve, and emergency supply.

The distribution system has a complex network of transmission and distribution pipelines ranging from 2 to 24 inches in diameter. Most of the mains consist of lined and unlined steel, cast iron, and ductile iron pipe and a network of distribution pipelines (City of Beverly Hills 2015).

Water storage typically takes two forms: surface reservoirs and groundwater basin storage. MWD has developed dry-year storage with a capacity of more than 5.5 million acre-feet, which includes both surface reservoirs and groundwater storage sources. The City also has two emergency water supply connections with the City of Los Angeles' Department of Water and Power. The minimum average water supply estimated for the City for 2016–2018 was 10,700 acre-feet per year (City of Beverly Hills 2015).

A Water Conservation Ordinance, Water Efficient Landscaping Ordinance, and Stormwater Ordinance have been put into place to assist with the City's water conservation efforts.

Wastewater

The City's Department of Public Works maintains sewer collection and distribution systems throughout the City. The existing sanitary sewer system consists of over 95 miles of sewer mains that connect to the City of Los Angeles' sewer facilities at the southeastern border of the City. Over 65 percent of the existing system consists of 8-inch-diameter pipe and over 50 percent of the system is more than 50 years old (City of Beverly Hills 2005). The City has a rehabilitation program to repair, reline, and/or replace the existing wastewater infrastructure. This program allows the City to avoid costly replacements of damaged sections. The City of Beverly Hills sewer system currently serves a resident population of approximately 35,700 people and a daytime population of approximately 294,000 people in a service area composed of a mixture of land uses including residential, commercial, industrial, and institutional. In addition to this daytime population noted above, an estimated 44,700 people are in transit through the City during AM peak hours, and approximately 46,000 during PM peak hours (City of Beverly Hills 2005).

All of the wastewater flows generated from the City (not including stormwater) are collected and treated at the Los Angeles Hyperion Water Reclamation Plant (Hyperion), located on the coast at 12000 Vista Del Mar in the City of El Segundo. Hyperion treats wastewater from the cities of

Beverly Hills, Burbank, much of the City of Los Angeles, Culver City, El Segundo, Glendale, San Fernando, Santa Monica, and portions of Los Angeles County. Currently, Hyperion is the largest of four wastewater treatment plants in the area surrounding the City of Los Angeles.

The City utilizes BMPs and the latest technology to maintain optimal conditions of the wastewater system. The City's sewage is treated at Hyperion and is used to produce high-quality recycled water that meets state and federal standards for non-potable uses. To ensure that wastewater discharges are treated properly, the City contracts with the County of Los Angeles to administer the Industrial Waste Program. The program makes sure that industrial and commercial discharges meet state and federal standards to protect the integrity of the overall sewer system and Hyperion.

Stormwater

The City is part of the Ballona Creek Watershed, which is a tributary to Santa Monica Bay. The storm drain system is designed to prevent flooding by carrying away rainwater from the streets to the ocean in the fastest manner through a series of pipes and channels underneath the streets (City of Beverly Hills 2019b).

The City is currently providing services that would improve water quality such as extensive street sweeping in the commercial and residential areas, weekly sidewalk pressure washing in the commercial district, an extensive trash receptacle management program, cleaning catch basins, and retrofitting catch basins with screens to prevent trash and debris from entering the storm drain system. In addition, the City is also inspecting restaurants, gas and car service stations, and construction sites to ensure that BMPs are in place.

Eliminating pollution dumping on streets (illicit discharge) and eliminating illegal connections to the storm drain system and recovering sewer overflows from the storm drain system are also efforts to improve stormwater. The City has been actively participating in regional efforts by implementing the Ballona Creek Enhanced Watershed Management Program (EWMP) Plan and educating the community during city-wide events.

During construction, developers are required to implement an Erosion and Sediment Control Plan (ESCP) that has the following requirements:

- Sediment Control BMPs (silt fence, sand bag barrier, stabilized construction site entrance/exit, sediment, and dust control).
- Waste Management BMPs (stockpile management, spill prevention control, solid waste management, sanitary and septic waste management).
- Erosion Control BMPs (scheduling and preservation of existing vegetation).
- Non-Stormwater Management (Water Conservation Practices and dewatering operations).
- For projects that will disturb more than 1 acre, projects are required to implement a statewide SWPPP.

New building development projects are subject to low impact design (LID) requirements under the City's stormwater ordinance, which requires projects to capture and/or infiltrate the first inch of rain from a storm event and can help improve water quality by managing their runoff on-site by doing the following:

- If feasible, disconnect roof downspouts from the drainage system and redirect runoff to landscape areas.
- Capture roof runoff by installing rain barrels or cistern system. Water that is captured can be used to water your landscape.
- Maintain or increase landscape areas. Landscape areas help manage runoff on-site.

Electricity

Electricity service in the City is provided by SCE. The Big Creek hydroelectric system comprises approximately 90 percent of SCE's hydroelectric generation capacity. The Mohave Generating Station also contributes to SCE's power supply. Some customers within the City may purchase power generation through "direct access" from other providers. In these cases, SCE would deliver the power through existing infrastructure. Areas of the City where direct access purchasing is available are typically in fringe areas, along common borders with neighboring cities. These areas are minimal and usually account for a small percentage of electricity demand.

Currently, SCE has four substations that serve the City. The largest substation serving the City is located just east of City Hall, at Foothill and 3rd Street. SCE has indicated that the infrastructure is in good condition. SCE plans to upgrade the substations as the demand at each substation increases (City of Beverly Hills 2005). There are no major electricity transmission lines in the City. Major electricity transmission lines are those that carry a minimum of 220 kV of power. The largest transmission line is a SCE-operated 66 kV transmission line. The majority of transmission lines serving the City are located underground. Currently, SCE has no immediate plans for expansion within the City of Beverly Hills, as most of the City is built out. However, every year, SCE expands and improves existing facilities according to demand.

Natural Gas

Southern California Gas Company (SoCalGas) provides Natural Gas service for the City of Beverly Hills. Natural gas is a "fossil fuel," indicating that it comes from the ground, similar to other hydrocarbons such as coal or oil. SoCalGas purchases natural gas from several bordering states.

Currently, SoCalGas maintains transmission and distribution lines throughout the City. Most lines operate at a medium pressure of approximately 30 to 60 pounds per square inch (psi). Virtually all streets within the City have a buried pipe that is tied to the SoCalGas network. Distribution lines located in industrial areas generally require higher pressures. Major high-pressure natural gas lines within the City and within approximately 1 mile of the Project and Project Alternatives include the following (City of Beverly Hills 2005):

- 8-inch line in Beverly Drive between Olympic and Pico Boulevards;
- 16-inch line in Robertson Boulevard between Whitworth Drive and Olympic Boulevard;
- 6-inch line in Arnaz Drive between Gregory Way and Wilshire Boulevard;
- 8-inch line in Reeves Drive between Olympic and Wilshire Boulevards; and
- 8-inch line in Canon Drive between Wilshire Boulevard and Carmelita Avenue.

CPUC regulates SoCalGas and is the default provider, required by state law, for natural gas delivery to the City. SoCalGas has the capacity and resources to deliver gas except in certain situations that are noted in state law. As development occurs, SoCalGas will continue to extend

its service to accommodate development and supply the necessary gas lines. SoCalGas does not base its service levels on the demands of the City; rather, it makes periodic upgrades to provide service for particular projects and new development. Approximately 2 months before construction commences on a project, SoCalGas requests that the developer contact them with detailed information about the project's natural gas requirements. If necessary, SoCalGas customizes pipelines and mains to better serve newly constructed facilities. The cost for such service differs from project to project. SoCalGas is continuously expanding its network of gas pipelines to meet the needs of new commercial and residential developments in Southern California.

Telecommunications

Current telecommunication services in the City includes the following:

- Telephone service provided by PacBell
- Digital cable television service provided by various providers
- Internet service provided by various providers
- Cellular phone service available through various providers
- Municipal Area Network

Current technology allows residents and businesses to utilize a variety of options for their telecommunication needs.

3.14.4 Impact Evaluation

Impact UTIL-1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. There would be no impacts that would require the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities; therefore, no impact would occur.

The Project (Beverly Drive)

Construction Impacts

Construction of the Project would occur on the west side of North Beverly Drive, within the existing street right-of-way (ROW), north of Wilshire Boulevard. The footprint of the Project would be approximately 9,200 square feet and would extend from its connection to the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 165 feet north up North Beverly Drive. Construction of the Project would require utility relocations, piling, and excavation.

Utility work is required for the Project construction. Utilities that conflict with the excavation support (piling/decking) would be relocated onto a new alignment, or reinstated on the same alignment, depending on the requirements of the utility owner. Utility relocations would be one of the first activities to be performed once the contractor mobilizes on-site (Parsons Brinkerhoff 2019).

The Project would require the relocation of a fiber optic line, two storm drains, and street lighting, all owned and operated by the City. In addition, a fire hydrant and 6-inch-diameter water main are present on the north side of Wilshire Boulevard and Beverly Boulevard that may require relocation (City of Beverly Hills 2018). Wastewater and gas line relocations would not be required. Utility relocations are anticipated to take approximately 8 months.

The Project is located in the Rexford service area, which finished construction on the existing fiber optic line in May 2019. The relocation of the fiber optic line would be limited to the immediate Project footprint; thereby, minimal disruption would occur to nearby residences and businesses. Typically, the first step involves laying and enabling the fiber optic line in the adjacent sidewalk and installation of switching boxes, and the second phases would take the fiber optic line from the street to the Project footprint (City of Beverly Hills 2019a).

Storm drain relocation would involve asphalt removal, excavation, potholing, shoring, and the installation of storm drain pipe. All work would be performed under necessary permits and approvals, and disruption to service is not anticipated. Water line relocation may involve temporary service interruption but affected businesses and residents would be notified at least 30 days in advance if necessary.

Utility connections such as water and power would also be required. Temporary power would be supplied by SCE and would be required to run lighting, ventilation fans, and other construction-related activities for the Project. Electricity would also be required for dewatering activities during Project construction.

Compliance with applicable regulations would ensure that the Project would accommodate all stormwater runoff. Stormwater BMPs would be implemented during construction and operation of the Project to lessen the amount of runoff from the Project to the maximum extent practicable. In addition, the City requires that applicants prepare an urban runoff mitigation plan prior to construction of a project. This plan must comply with the most recent Standard Urban Stormwater Mitigation Plan (SUSMP) and the current municipal NPDES permit. This process is intended to reduce stormwater discharges by requiring the applicant to increase pervious surface area and to reduce the amount of runoff to the City's storm drain system. The NPDES permit issued to the LARWQCB provides regulations for urban runoff discharges in Los Angeles County. With implementation of the aforementioned BMPs, SUSMP, and NPDES permit, Project construction would not require expansion of the City's storm drain facilities.

Construction activities could potentially result in the interruption of service while utilities are being relocated. However, with implementation of BMPs and coordination with the appropriate utility service provider, construction activities would have minimal impacts on utility services in the area.

Dewatering would be required during construction, and adherence to BHMC Chapter 4, Article 6 governs these requirements. Per the code, all extracted groundwater should be reused when possible. Reuse options include recharging the groundwater to the basin; placing the groundwater to reasonable and beneficial use on the property, including irrigation or other non-potable use, or delivering the groundwater to the City for treatment and use by the City.

As mentioned above, the Project would require storm drain and water line relocations. The relocations would provide capacity for the approximately 9,200-square-foot Project footprint and is not anticipated to cause significant environmental effects due to the size and scope of the project. There may be temporary disruption of service to nearby residences and businesses, but notification would be given at least 30 days in advance so impacts would be less than significant. The relocations would not be of a large scale or scope and would not cause significant environmental effects. Therefore, impacts related to relocation or construction of new or expanded water, stormwater drainage, electric power, or telecommunications facilities during construction would be less than significant. There would be no impact related to the relocations of wastewater or gas utilities.

Operational Impacts

The source of electric power to be utilized during Project operations would connect from the existing electrical system of the Wilshire/Rodeo Station. It is anticipated that the existing power supply and other utilities being provided for the Wilshire/Rodeo Station will be sufficient for Project operations.

The Project would implement current NPDES regulatory requirements. These requirements are more stringent than what was in place when the infrastructure was originally built and therefore the amount of pollutants that currently enter the storm drain system would be reduced and no impact would occur. Therefore, impacts related to relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities during operation would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

The Cañon Drive-Half Portal Alternative would be located on the west side of Cañon Drive, within the existing street ROW, north of Wilshire Boulevard. The footprint of this alternative would be approximately 8,100 square feet and would extend from its connection to the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 195 feet north up North Cañon Drive.

Similar to the construction impacts associated with the Project, the Cañon Drive-Half Portal Alternative would require utility work during construction. Utilities that conflict with the excavation support (piling/decking) would be relocated onto a new alignment, or reinstated on the same alignment, depending on the requirements of the utility owner. Utility relocations will be one of the first activities to be performed once the contractor mobilizes on the site.

This alternative would require the following utility relocations during construction: fiber optic line, a water line, fire hydrant, storm drain and catch basin, and street lighting. Temporary power would be required for lighting, dewatering pumps, and to operate ventilation fans, and utility connections such as water and power would also be required. Both temporary and permanent power would be required for the Cañon Drive-Half Portal Alternative. Temporary power would be required to run lighting, ventilation fans, and other construction related plant. Power is anticipated to come from SCE.

The Cañon Drive-Half Portal Alternative is located in the Rexford service area, which finished construction on the existing fiber optic line in May 2019. The relocation of the fiber optic line would be limited to the immediate project footprint; thereby, minimal disruption would occur to

nearby residences and businesses. Typically, the first step involves laying and enabling the fiber optic line in the adjacent sidewalk and installing switching boxes, and the second phase would take the fiber optic line from the street to the site (City of Beverly Hills 2019a).

Storm drain relocation would involve asphalt removal, excavation, potholing, shoring, and installation of storm drain pipe. All work would be performed under necessary permits and approvals, and disruption to service is not anticipated. Water line relocation may involve temporary service interruption but affected businesses and residents would be notified at least 30 days in advance if necessary.

Although construction activities have the potential to affect utilities due to interruption of service while utilities are being relocated, utility service provider coordination and implementation of BMPs such as residential and business notifications would minimize impacts on utility services. Therefore, impacts related to relocation or construction of new or expanded water, stormwater drainage, electric power, and telecommunications facilities during construction would be less than significant. There would be no impact related to the relocations of wastewater or gas utilities.

Operational Impacts

Permanent electric power to the Cañon Drive-Half Portal Alternative is anticipated to come from the Wilshire/Rodeo Station. It is anticipated that the existing power supply and other utilities being provided for the Wilshire/Rodeo Station will be sufficient for the Cañon Drive-Half Portal Alternative operations.

The Cañon Drive-Half Portal Alternative would implement current NPDES regulatory requirements. These requirements are more stringent than what was in place when the infrastructure was originally built and therefore the amount of pollutants that currently enter the storm drain system would be reduced and no impact would occur. Therefore, impacts related to relocation or construction of new or expanded water stormwater drainage, electric power, or telecommunications facilities during operation would be less than significant. There would be no impact related to the relocations of wastewater or gas utilities.

Cañon Drive Staging Yard Alternative

Construction Impacts

The Cañon Drive Staging Yard Alternative would require electric power, water, and telecommunication system relocations for the underground walkway between the new portal and the concourse within the station. However, as the walkway is underneath the stair appendage, which is already within the scope of work for the previously approved Purple Line Extension Project, additional utility relocation work is expected to be minimal because the utilities have already been planned for the Wilshire/Rodeo Station and would be simply rerouted for construction of this alternative. Therefore, impacts related to relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities during construction would be less than significant.

Operational Impacts

The planned systems provided for the approved Purple Line Extension Project are expected to be adequate to accommodate the Cañon Drive Staging Yard Alternative because the Purple Line Extension Project requires large utility systems due to its size and scope. Infrastructure and

power to support solid waste, water, wastewater, stormwater, electricity, natural gas, and telecommunications systems required for the Cañon Drive Staging Yard Alternative would be incrementally less than what is needed for the operation of the Purple Line Extension Project because the Cañon Drive Staging Yard Alternative would include a station portal entrance/exit including stairs, escalators, elevators, passenger information systems, ticketing machines and ticket gates.

Impacts related to relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities during operation would be less than significant.

Impact UTIL-2. Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to utilities, including water supply, would occur.

The Project (Beverly Drive)

Construction Impacts

As mentioned in Section 3.14.3, the capacity of the City's water supply sources is adequate to meet projected ultimate demands for the City's service area, and the City does not anticipate an increase in water usage that will exceed the current supply. Although the City's existing water storage reservoirs do not provide sufficient emergency storage, the City is taking measures to resolve this issue. Construction for the Project is considered a reasonably foreseeable future development, as it would be physically connected to the previously approved Purple Line Extension Project. Impacts related to water supply during construction would be less than significant.

Operational Impacts

As mentioned in Section 3.14.3, the capacity of the City's water supply sources is adequate to meet projected ultimate demands for the City's service area, and the City does not anticipate an increase in water usage that will exceed the current supply. Although the City's existing water storage reservoirs do not provide sufficient emergency storage, the City is taking measures to resolve this issue. The operation of stairs, escalators, elevators, passenger information systems, ticketing machines, and ticket gates would not require water systems in excess of what has already been planned for the Purple Line Extension Project. There are no restrooms or facilities that would require large amounts of water for operation. Water usage would be limited to irrigation of new trees and other minimal landscaping on the street level. Minimal water usage would be required for operation of the Project. Therefore, impacts related to water supply during operation would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

Construction water supply impacts related to the Cañon Drive-Half Portal Alternative would be similar to those of the Project discussed above. Construction for the Cañon Drive-Half Portal Alternative is considered a reasonably foreseeable future development, as it would be physically connected to the previously approved Purple Line Extension Project. Impacts related to water supply during construction would be less than significant.

Operational Impacts

Operational water supply impacts related to the Cañon Drive-Half Portal Alternative would be similar to those of the Project discussed above. Minimal water usage would be required during operation of this alternative because no restrooms or other large water capacity features are included with this alternative. Water usage would be limited to irrigation of new trees and other minimal landscaping on the street level. Minimal water usage would be required for operation of the Cañon Drive-Half Portal Alternative. Therefore, impacts related to water supply during operation would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

Construction water use related to the Cañon Drive Staging Yard Alternative is anticipated to be negligible. Construction of the Cañon Drive Staging Yard Alternative is considered a reasonably foreseeable future development, as it would be physically connected to the previously approved Purple Line Extension Project. There would be no impact related to water supply during construction.

Operational Impacts

Operational water supply impacts related to the Cañon Drive Staging Yard Alternative would be similar to those of the Project and Cañon Drive-Half Portal Alternative discussed above. However, it is anticipated that public restrooms would be included. The public restrooms provided for would include only two total restroom stalls and two total sinks. As such, the restrooms would not facilitate the use of large amounts of water that would impact the water supply in the City. No large water capacity features are included with the Cañon Drive Staging Yard Alternative. Minimal water usage would be required during operation for irrigation for landscaping and new trees at the street level. Therefore, impacts related to water supply during operation would be less than significant.

Impact UTIL-3. Result in a determination by the waste water 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.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of

Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to utilities, including wastewater treatment demand, would occur.

The Project (Beverly Drive)

Construction Impacts

The construction of the Project would temporarily generate wastewater through dewatering and other construction activities. Dewatering would be performed in compliance with BHMC Chapter 4, Title 9, which specifies that dewatering would be conducted under the applicable project permit conditions. The RWQCB NPDES dictates that all existing and future municipal and industrial discharges to surface waters within the City are subject to regulations, and NPDES permits are required for operators of MS4s, construction projects, and industrial facilities. These permits contain limits on the amount of pollutants that can be contained in each facility's discharge and the Project would be subject to those requirements. The existing wastewater treatment system would support the Project during construction.

As previously discussed, Hyperion is the largest of four wastewater treatment plants in the area surrounding the City of Los Angeles. The plant has a dry weather capacity of 450 mgd for full secondary treatment and an 850 mgd wet weather capacity. Current flow is 340 mgd. The maximum recorded daily flow generated by the City is approximately 12 mgd and the average flow is approximately 6 mgd. Construction of the Project is not expected to substantially contribute to the amount of wastewater the City currently generates. Project construction would be conducted in accordance to applicable BMPs and NPDES permit requirements. Therefore, impacts related to wastewater treatment demand during construction would be less than significant.

Operational Impacts

Operation of the Project would comply with the NPDES permit and Title 6 of the BHMC, which regulates the construction and operation of wastewater systems and the discharge of wastewater into the City wastewater system. The Project does not include any restrooms or other wastewater-generating facilities and is not expected to substantially contribute to what the City currently generates. Any wastewater generated by the Project would be collected and transported through existing local, trunk, and mainline sewers. The quality of wastewater from the Project is expected to be typical and would not exceed wastewater treatment requirements of the RWQCB. Therefore, impacts related to wastewater treatment demand during operation would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

Construction wastewater impacts related to the Cañon Drive-Half Portal Alternative would be largely the same as those discussed for the Project above. The construction of this alternative would temporarily generate wastewater through dewatering and other construction activities. Dewatering would be performed in compliance with BHMC Chapter 4, Title 9, which specifies that dewatering would be conducted under the applicable Project permit conditions. Construction of this alternative is not expected to substantially contribute to the amount of wastewater the City currently generates. Construction of the Cañon Drive-Half Portal Alternative would be conducted in accordance to applicable BMPs and NPDES permit requirements.

Therefore, impacts related to wastewater treatment demand during construction would be less than significant.

Operational Impacts

Operational impacts for the Cañon Drive-Half Portal Alternative would be largely the same as the Project mentioned above and impacts on wastewater demand during operation would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

Due to the scope and the similar project components, construction impacts for the Cañon Drive Staging Yard Alternative would be largely the same as the Project and Cañon Drive-Half Portal Alternative. The Cañon Drive Staging Yard Alternative footprint would not be any larger than the footprints of the other Alternatives and impacts on wastewater demand during construction would be less than significant.

Operational Impacts

Operational impacts for the Cañon Drive Staging Yard Alternative would be largely the same as the Project and Cañon Drive-Half Portal Alternative mentioned above and the operational impact on wastewater systems would be less than significant.

Impact UTIL-4. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

Impact UTIL-5. Not comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

Please note that impact analysis for Impact UTIL-4 and UTIL-5 listed above is included in the combined analysis below.

No Project Alternative

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Construction of the previously approved Purple Line Extension Project would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. No impacts to utilities, including solid waste generation, would occur.

The Project (Beverly Drive)

Construction Impacts

Construction of the Project would involve site preparation activities (e.g., excavation and building) that would generate waste materials. During construction, the handling of all debris and waste would be subject to the local and state (AB 939) requirements for salvaging, recycling, and reuse of materials from construction activity on the Project site. Due to the reduction in waste in complying with AB 939, the Project would not result in an increase in solid

waste beyond the capacity of the two designated landfills. The incremental increase in solid waste would be within the permitted capacities.

The Project footprint is approximately 9,200 square feet, so it can be reasonably assumed that demolition and excavation to construct the Project would not exceed the landfill capacities as described in Section 3.14.3. Solid waste would not be generated in excess of state or local standards or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. The Project would comply with federal, state, and local reduction strategies and regulations related to solid waste. Therefore, impacts related to solid waste during construction would be less than significant.

Operational Impacts

AB 341 requires mandatory commercial recycling in California beginning July 1, 2012. Businesses or public entities that subscribe to a service of 4 cubic yards or more of solid waste per week must recycle; therefore, the Project would be subject to those requirements. Once constructed, the Project would operate as a station entrance portal and does not include any restroom facilities or other substantial solid waste-generating uses. It would not generate solid waste in excess of standards or in a way that would impair solid waste reduction goals and, therefore, impacts related to solid waste during operation would be less than significant.

Cañon Drive-Half Portal Alternative

Construction Impacts

The construction impacts for the Cañon Drive-Half Portal Alternative would be largely the same as the Project, as discussed above. The incremental increase in solid waste during construction would be within the permitted capacities. The Cañon Drive-Half Portal Alternative would comply with federal, state, and local reduction strategies and regulations related to solid waste. Therefore, impacts related to solid waste reduction statutes and regulations during construction would be less than significant.

Operational Impacts

The operational impacts for the Cañon Drive-Half Portal Alternative would be largely the same as the Project, as discussed above. Once constructed, the Cañon Drive-Half Portal Alternative would operate as a station entrance portal and does not include restroom facilities or other substantial solid waste-generating uses. This alternative would not generate solid waste in excess of standards or in a way that would impair solid waste reduction goals. Therefore, impacts related to solid waste reduction statutes and regulations during operation would be less than significant.

Cañon Drive Staging Yard Alternative

Construction Impacts

The construction impacts for the Cañon Drive Staging Yard Alternative would be largely the same as the Project and Cañon Drive-Half Portal Alternative, as discussed above and would not generate solid waste in excess of state or local standards or exceed capacity of local infrastructure. The incremental increase in solid waste during construction would be within the permitted capacities. The Cañon Drive Staging Yard Alternative would comply with federal, state, and local reduction strategies and regulations related to solid waste. Therefore, impacts

related to solid waste reduction statutes and regulations during construction would be less than significant.

Operational Impacts

The operational impacts for the Cañon Drive Staging Yard Alternative would be similar to the Project, as discussed above. Once constructed, this alternative would operate as a station entrance portal and would not include substantial solid waste-generating uses. Two public restrooms would be included but are not anticipated to generate a substantial amount of solid waste because of their limited size. The Cañon Drive Staging Yard Alternative would not generate solid waste in excess of standards or in a way that would impair solid waste reduction goals. Therefore, impacts related to solid waste reduction statutes and regulations during operation would be less than significant.

3.14.5 Mitigation Measures

Impacts related to utilities and services systems are less than significant. As such, Mitigation Measures are not proposed.

3.14.6 Impacts after Mitigation

Impacts related to utilities and services systems are less than significant. As such, Mitigation Measures are not proposed.

3.14.7 Cumulative Impacts

No Project Alternative

Related projects identified within approximately 1 mile of the Project and Project Alternatives generally include commercial and residential construction or expansion. These related projects would also be required to comply with applicable federal, state, and local regulations concerning utilities and services systems.

Under the No Project Alternative, an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard would not be constructed. Planned and approved City of Beverly Hills and other municipal projects would be implemented. Construction of the previously approved Purple Line Extension Project Section 2 and associated Wilshire/Rodeo Station would still occur, and a knockout panel on the north side of Wilshire Boulevard included in the design of the Wilshire/Rodeo Station would be completed by Metro. Any potential impacts to utilities and service systems were evaluated, and mitigation measures proposed as applicable, in Metro's previous separate environmental review process. The No Project Alternative would not contribute to a cumulative impact related to utilities and service systems.

The Project and Project Alternatives

Related projects identified within approximately 1 mile of the Project and Project Alternatives generally include commercial and residential construction expansion, or rezoning. In addition, the previously approved Purple Line Extension Project is also considered a related project. These related projects would also be required to comply with applicable federal, state, and local regulations concerning utilities.

Construction of the related projects could potentially result in temporary service impacts that could impact local utilities and service systems. However, the Project, the Cañon Drive-Half Portal Alternative, and the Cañon Drive Staging Yard Alternative would include the implementation of applicable BMPs including the development and implementation of a utility coordination plan and residential and business notifications, as well as compliance with the RWQCB NPDES permit, that would ensure that impacts would be less than significant. In addition, use of water and generation of wastewater would be similar to a typical construction project in the area. The Project and Project Alternatives in conjunction with the related projects would not contribute to a cumulative impact related to utilities and service systems during construction.

Operations of the related projects could also result in impacts to local utilities and service systems. Commercial and residential projects typically result in increased demands on water supply, and more substantial generation of wastewater and solid waste. The related projects would be required to comply with all applicable regulations and standards that control these utilities. In addition, these projects would be required to implement measures to reduce significant impacts in separate environmental approval processes. The Project and Project Alternatives would include a new station portal entrance/exit to the previously approved Wilshire/Rodeo Station and would not include uses that would generate substantial amounts of wastewater and solid waste. Limited public restroom facilities would be provided only with the Cañon Drive Staging Yard Alternative, which would increase water demand slightly, however the water usage would not be substantial and would be met by the City's existing water supply. Other utilities and service systems required for the Project and Project Alternatives are expected to be provided as part of the provisions included with the Wilshire/Rodeo Station. Demand on utilities and services systems during operations would not result in new facilities being required and would not exceed applicable requirements. The Project and Project Alternatives in conjunction with the related projects would not contribute to a cumulative impact related to utilities and service systems during operation.

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4. OTHER CEQA REQUIRED DISCUSSIONS

This chapter provides an overview of the environmental effects of the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and Cañon Drive Staging Yard Alternative, including environmental topics that do not require further analysis in this EIR or result in significant unavoidable adverse impacts, growth-inducing impacts, and significant irreversible environmental effects. The Project and two alternatives are collectively referred to as the Project and Project Alternatives. Cross-references are made throughout this chapter to other chapters of the EIR where more detailed discussions of the impacts of the Project and Project Alternatives can be found.

4.1 Environmental Topics Not Requiring Further Analysis

The following environmental topics are evaluated briefly as they would not be impacted by the Project or Project Alternatives, and therefore do not require further analysis in the EIR. While these environmental topics may sometimes be scoped out during the preparation of an Initial Study, an Initial Study was not prepared for this Project; therefore, these topics are included below with a brief evaluation.

4.1.1 Agricultural/Forestry Resources

CEQA Thresholds

An impact is considered significant if the project would:

1. 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;
2. Conflict with existing zoning for agricultural use, or a Williamson Act contract;
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g));
4. Result in the loss of forest land or conversion of forest land to non-forest use; and/or
5. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.

Existing Conditions

The location of the Project and Project Alternatives can be described as a highly urbanized and densely developed area of the City, generally characterized as a commercial and residential area. The roads located adjacent and near the Project and Project Alternatives include busy thoroughfares such as Wilshire Boulevard, Rodeo Drive, North Beverly Drive, North Cañon Drive, and North Crescent Drive. Buildings north of Wilshire Boulevard are typically larger and densely packed commercial, retail, residential, and mixed-use developments. Buildings south of

Wilshire Boulevard and south of the commercial frontage mostly comprise single-family residences and small multi-family apartment buildings.

The Project site and the Cañon Drive-Half Portal Alternative site are located within the public ROW, which includes roadways and sidewalks. The Cañon Drive Staging Yard Alternative site is located on property that has a General Plan land use designation of Commercial Low-Density General and is zoned C-3 (Commercial), as defined by the City's Zoning Ordinance and the Land Use Element of the General Plan (City of Beverly Hills 2008). Uses permitted in the C-3 Commercial Zone include commercial uses, such as cafes, offices, and retail shops. No areas within the City are zoned for agricultural or forestland uses (City of Beverly Hills 2008).

Brief Evaluation

No prime or unique farmland, or farmland of statewide importance exists within or near the Project and Project Alternatives. The Project and Project Alternatives are not located on or near any property zoned or otherwise intended for agricultural uses or located in an area subject to a Williamson Act contract (California Department of Conservation 2016). Additionally, no forest lands or timberland are located on or near the Project and Project Alternatives (California Department of Fish and Wildlife 2015).

Given the above, construction and operation of any of the Project and Project Alternatives would not impact agriculture or forestry resources and no mitigation measures would be required. As such, there would be no impacts to agriculture and forestry resources, and no further analysis is required.

4.1.2 Land Use and Planning

CEQA Thresholds

An impact is considered significant if the project would:

1. Physically divide an established community; and/or
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Existing Conditions

The Project site and the Cañon Drive-Half Portal Alternative site are within the public ROW, which includes roadways and sidewalks. The Cañon Drive Staging Yard Alternative site is located on property that has a General Plan land use designation of Commercial Low-Density General and is zoned C-3 (Commercial), as defined by the City's Zoning Ordinance and the Land Use Element of the General Plan (City of Beverly Hills 2008). Uses permitted in the C-3 Commercial Zone includes commercial uses, such as cafes, offices, and retail shops. The Project is not anticipated to require amendments to the City's General Plan or the Beverly Hills Municipal Code (BHMC).

The Project site is located within the existing North Beverly Drive ROW and is bordered by the Maybourne Beverly Hills Hotel to the east, Bank of America Financial Centre offices to the southeast, Union Bank offices to the south, and Chase Bank offices to the west. MGM Studios is located to the north of the Project site and the surrounding area is generally occupied by fitness centers, restaurants, and retail establishments.

The Cañon Drive-Half Portal Alternative is within the existing North Cañon Drive ROW and is immediately bordered by the Bank of the West office to the west and Coldwell Banker Real Estate offices to the east. On the opposite side of Wilshire Boulevard, East West Bank offices are to the southeast of this site and US Bank offices and carpark are to the south. These offices provide leased space to multiple businesses. Reeves Park is a small public green space and is approximately 350 feet south of the intersection of North Cañon Drive and Wilshire Boulevard.

The Cañon Drive Staging Yard Alternative is located on Wilshire Boulevard within an area previously acquired for repurposing as a staging yard for the Section 2 Project. This Alternative proposes to use this land for the construction of the new station portal. Neighboring the staging yard are the Coldwell Banker Real Estate offices to the northwest and the Torrey Pines Bank offices and other similar offices to the east. The area immediately on the south side of Wilshire Boulevard to the proposed project site is a Ferrari car dealership, the East West Bank offices, and the US Bank offices and carpark. These offices provide leased space to multiple businesses. Sixty Beverly Hills Hotel is approximately 300 feet to the southeast and AKA Beverly Hills Hotel is approximately 75 feet northeast on North Crescent Drive.

Brief Evaluation

The implementation of the Project and Project Alternatives would not introduce structures or permanent road closures that would physically divide an established community. No streets or sidewalks would be permanently closed as a result of the Project and Project Alternatives, and no separation of existing uses or disruption of existing access between land use types would occur. Road and traffic lane closures would be required temporarily during the construction phase.

The City of Beverly Hills General Plan

The General Plan was originally adopted in May 1977 and the most recent large-scale amendment and publication were in April 2010, with the last Housing Element adopted in 2013. The General Plan contains the City's over-arching goals, policies, and programs and is intended to be usable by all members of the community including residents, businesses, developers, and visitors. The General Plan establishes land use designations for property within the City; identifies public improvements, including traffic, infrastructure and community services that the City would implement in order to maintain and improve the community for future generations; and defines the City's economic sustainability aspirations, among other things. As previously discussed, the Project and Project Alternatives are not anticipated to require amendments to the City's General Plan or the BHMC.

SCAG Regional Plan

SCAG is the designated regional transportation planning agency under the state and is responsible for preparing the RTP, including the SCS pursuant to SB 375, and for reviewing the consistency and alignment of local plans, projects, and programs with its regional plan's goals and policies. Adopted in April 2016, SCAG's RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development, and preserve the quality of life for the region's residents. Table 4-1 lists the 2016 RTP/SCS goals and a discussion of the applicability of the goals for the Project and Project Alternatives:

Table 4-1 SCAG RTP/SCS Goals and Consistency

RTP/SCS Goal	Applicability
Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.	Consistent: The Project and Project Alternatives would deliver improved, convenient, and safe public access to the Beverly Hills Business Triangle, a prime local and regional destination, and a key hub for tourism, shopping, and dining experiences. Note that the Project and Project Alternatives would not substantially affect the local economy as the purpose of the Project and Project Alternatives is to provide additional access to riders who would utilize the Metro Purple Line Wilshire/Rodeo Station. (Section 4.3 Growth Inducement)
Goal 2: Maximize mobility and accessibility for all people and goods in the region.	Consistent: The Project and Project Alternatives would provide a new station portal entrance/exit for the Wilshire/Rodeo Station on the north side of Wilshire Boulevard and would enhance non-motorized connectivity between the Wilshire/Rodeo Station and the surrounding areas. (Section 3.12 Transportation)
Goal 3: Ensure travel safety and reliability for all people and goods in the region.	Consistent: With the North Portal, pedestrian access would connect to the existing sidewalk network and allow pedestrians to access the station from the north without crossing Wilshire Boulevard. (Section 3.12 Transportation)
Goal 4: Preserve and ensure a sustainable regional transportation system.	Consistent: The Project and Project Alternatives would support transit use by enhancing station access. (Sections 3.5 Energy and 3.12 Transportation)
Goal 5: Maximize the productivity of our transportation system.	Consistent: The North Portal would provide additional Wilshire/Rodeo Station access to riders who are already anticipated to utilize the Metro Purple Line Extension. (Section 4.3 Growth Inducement)
Goal 6: Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	Consistent: The Project and Project Alternatives would result in a reduction of vehicle miles traveled in the region by encouraging people to take public transit. The addition of the North Portal would improve pedestrian flow. (Sections 3.2 Air Quality and 3.5 Energy)
Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	Consistent: The North Portal would delivery improved, convenient, and safe public access to the Beverly Hills Business Triangle; thus, encouraging increased ridership and reducing vehicle trip emissions from passengers who would otherwise drive. (Section 3.5 Energy)
Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.	Consistent: The Project and Project Alternatives would support transit use by enhancing non-motorized connectivity and access between the Wilshire/Rodeo Station and the surrounding areas north of Wilshire Boulevard. (Section 3.12 Transportation)

Table 4-1 SCAG RTP/SCS Goals and Consistency

RTP/SCS Goal	Applicability
Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	Consistent: Station systems, including communications (e.g., telephone, passenger information, emergency communications, CCTV), fire sprinklers, and gate systems, etc. would be connected to the Wilshire/Rodeo Station. (Chapter 2 Project Description)

As shown in Table 4-1, the Project and Project Alternatives would be consistent with the goals and policies of SCAG's RTP/SCS.

Implementation of the Project and Project Alternatives would not conflict with any existing land use plan, policy, or regulation and would adhere to and support the development standards, goals, and policies set out by the City, including, but not limited to the General Plan, Zoning Ordinance, or SCAG RTP/SCS.

Given the above, construction and operation of any of the Project and Project Alternatives would not impact land use and planning. As such, there would be no impacts to land use and planning, and no further analysis is required.

4.1.3 Population and Housing

CEQA Thresholds

An impact is considered significant if the project would:

1. Induce substantial unplanned 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); and/or
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

Existing Conditions

The total population of the City is approximately 34,290 and approximately 90 percent of the City is zoned for residential uses (City of Beverly Hills 2019). The area adjacent to the Project and Project Alternatives consists primarily of commercial offices, restaurants, retail shops, banks, and hotels. No residential uses are on or adjacent to the Project site or Project Alternatives sites. The nearest residential uses are approximately 175 feet south of Wilshire Boulevard beyond the commercial frontage, as well as approximately 270 feet northeast of the Project and Project Alternatives along North Crescent Drive.

Brief Evaluation

The Project and Project Alternatives would provide a new station portal entrance/exit for the Wilshire/Rodeo Station on the north side of Wilshire Boulevard. Existing housing is not on or adjacent to the Project and Project Alternative sites. As such, people or housing would not be displaced with the implementation of the Project or Project Alternatives. The Project and Project

Alternatives would not create new homes or businesses or otherwise directly or indirectly increase population. Since a viable station portal would exist on the south side of Wilshire Boulevard for the Wilshire/Rodeo Station for the Metro Purple Line Extension, population growth would not increase beyond what was analyzed as part of the Purple Line Extension EIS/EIR. To the extent the Wilshire/Rodeo Station would have any such impact, the impact of a second portal to serve that station would be minimal and less than significant. It is anticipated that construction workers would be local to the City of Beverly Hills and would not relocate. The Project and Project Alternatives would serve the existing community and visitors of the area and would not induce population growth. This is discussed in more detail in Section 4.3, Growth Inducement.

Given the above, construction and operation of the Project and Project Alternatives would not impact population and housing, and no mitigation measures would be required. As such, there would be no impacts to population and housing, and no further analysis is required.

4.1.4 Recreation

CEQA Thresholds

An impact is considered significant if the project would:

1. 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; and/or
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

Existing Conditions

The area that would be used to construct and operate the Project and Project Alternatives is either public ROW or is zoned as C-3 Commercial. Land uses immediately surrounding the Project and Project Alternatives include commercial offices, restaurants, retail shops, banks, and hotels. No parcels in the area would be required to construct and operate the Project and Project Alternatives that consist of recreational uses.

Three City parks providing open space areas that offer recreational, social, and cultural programs located in proximity to the Project and Project Alternatives are:

- Crescent Drive Mini Park is at 142 North Crescent Drive, approximately 1,000 feet east of the Project, 490 feet east of the Cañon Drive-Half Portal Alternative, and 250 feet northeast of the Cañon Drive Staging Yard Alternative.
- Reeves Mini Park is at 125 South Reeves Drive, approximately 420 feet southeast of the Project, 380 feet southwest of the Cañon Drive-Half Portal Alternative, and 510 feet southwest of the Cañon Drive Staging Yard Alternative.
- Beverly Cañon Gardens is at 241 North Cañon Drive, approximately 70 feet northeast of the Project, 350 feet northwest of the Cañon Drive-Half Portal Alternative, and 560 feet northwest of the Cañon Drive Staging Yard Alternative.

Brief Evaluation

The Project and Project Alternatives would provide a new station portal entrance/exit for the Wilshire/Rodeo Station on the north side of Wilshire Boulevard. No recreational facilities or parklands within the area would be required to construct or operate the Project and Project Alternatives. The Project and Project Alternatives would serve the existing community and visitors of the area and would not increase the use of existing neighborhood and regional parks or other recreational facilities or include recreational facilities or require the construction or expansion of recreational facilities.

Given the above, construction and operation of the Project and Project Alternatives would not impact recreation, and no mitigation measures would be required. As such, there would be no impacts to recreation, and no further analysis is required.

4.1.5 Wildfire

CEQA Thresholds

An impact is considered significant if the project (if located in or near state responsibility areas or lands classified as very high fire hazard severity zones) would:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan;
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
3. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; and/or
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Existing Conditions

The Project and Project Alternatives are located in an area that can be characterized as heavily developed and densely urbanized. The area surrounding the Project and Project Alternatives is predominantly flat, with a slight incline gradient when traveling in a northerly direction. The streets in the Project and Project Alternative areas are generally neatly landscaped with potted vegetation and well-maintained street trees. There are no forested areas or wildlands near the Project and Project Alternatives, or within the City.

As part of its goal to protect the community from wildfire and under its legislative obligations, the California Department of Forestry and Fire Protection (Cal Fire) has mapped areas of significant fire hazards (or Fire Hazard Severity Zones) in the state. Fire Hazard Severity Zones maps are used to define areas where wildfire-related building codes apply, and to provide a framework and relevant information to assist local governments in considering wildfire in the safety elements of their general plans (Cal Fire 2007). As part of this mapping process, State Responsibility Areas and Local Responsibility Areas were established and adopted by Cal Fire

in 2007 and 2008, respectively. Cal Fire is responsible for wildfire for the state, and local fire protection agencies are primarily responsible for their relevant local responsibility area (Cal Fire 2007). Given the adjacent urban setting, the Project and Project Alternatives are not located within a designated Very Fire Hazard Severity Zone, State Responsibility Area, or a Local Responsibility Area (Cal Fire 2017; Los Angeles County Fire Department 2018).

Brief Evaluation

The Project and Project Alternatives are not in or near any State or Local Responsibility Areas or any area classified as a Very Fire Hazard Severity Zone. The area surrounding the Project and Project Alternatives is completely developed, relatively flat, and lacking in wildfire-prone vegetated areas.

Therefore, construction and operation of the Project and Project Alternatives would not impact wildfire risks, and no mitigation measures are required. As such, there would be no impacts relating to wildfire, and no further analysis is required.

4.2 Significant Unavoidable Adverse Impacts

This section is prepared in accordance with Section 15126.2(b) of the CEQA Guidelines, which requires the discussion of any significant environmental effects that cannot be avoided if a project is implemented. These include impacts that can be mitigated but cannot be reduced to a less than significant level. An analysis of environmental impacts caused by the Project and Project Alternatives has been conducted and is contained in this EIR in Chapter 3. Fourteen environmental issue areas were analyzed in detail in Chapter 3. According to the environmental impact analysis, the Project and Project Alternatives would result in significant and unavoidable adverse impacts related to construction noise (Section 3.10).

4.3 Growth Inducement

Section 15125.2(d) of the CEQA Guidelines requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Section 15126.2(d) of the CEQA Guidelines states that the EIR should:

“Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environment effects. Also discuss the characteristics of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.”

Induced growth is any growth that exceeds planned growth and results from new development that would not have taken place without the implementation of the proposed project. Typically, the growth-inducing potential of a project would be considered significant if it results in growth or population concentration that exceeds those assumptions included in pertinent master plans,

land use plans, or projections made by regional planning authorities. However, the creation of growth-inducing potentials does not automatically lead to growth, whether it would be below or in exceedance of a projected level.

The environmental effects of induced growth are secondary or indirect impacts of the proposed project. Secondary effects of growth could result in significant, adverse environmental impacts, which could include increased demand on community public services, increased traffic and noise, degradation of air and water quality, and conversion of agricultural land and open space to developed uses.

4.3.1 Population Growth

As discussed in Chapter 2, Project Description, the fundamental purpose of the Project and Project Alternatives is to provide an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard thereby delivering improved and direct public access to the Beverly Hills Business Triangle, a prime local and regional destination, and a key hub for tourism, shopping, and dining experiences. The Project and Project Alternatives are expected to improve pedestrian and vehicle access by minimizing pedestrian crossings from the southern to northern sides of Wilshire Boulevard. An increase in Metro Purple Line Extension ridership that would induce growth is not expected to occur as a result of the implementation of the Project and Project Alternatives because a viable station portal would exist on the south side of Wilshire Boulevard. The Project and Project Alternatives would not include the construction of any residential uses or other uses that would result in an increase in the population. Therefore, the Project and Project Alternatives would not result in a direct significant growth-inducing impact related to population.

4.3.2 Economic Growth

The Project and Project Alternatives would generate temporary employment opportunities during construction. Because construction workers would be expected to be drawn from the existing regional work force, construction of the Project and Project Alternatives would not be growth-inducing from a temporary employment standpoint. During construction, vehicular access to certain businesses located adjacent to the construction zone could temporarily affect business operations. However, the City would coordinate with these local businesses and stakeholders in order to implement a plan to reducing business disruption during the construction phase.

The Project and Project Alternatives would not stimulate significant employment, involve development of new housing, or significantly affect the economy of the region (see Section 4.1.3 above) beyond what was analyzed as part of the Purple Line Extension EIS/EIR. Currently, the area located north of Wilshire Boulevard supports a number of businesses and their employees, and is considered a significant employment area within the City. The Project and Project Alternatives are not expected to substantially impact the local economy as the purpose of the North Portal is to provide additional Wilshire/Rodeo Station access to riders who are already anticipated to utilize the Metro Purple Line Extension. The Project and Project Alternatives would not substantially increase ridership or economic growth in the area beyond what is currently projected in adopted local and regional planning documents. Therefore, the Project and Project Alternatives would not result in a direct significant growth-inducing impact related to economic growth.

4.4 Significant Irreversible Environmental Effects

PRC Section 21100(b)(2)(B) and Section 15126.2(c) of the CEQA Guidelines require that an EIR analyze the extent to which the proposed project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations would not be able to reverse. Construction of the Project and Project Alternatives would result in the use of nonrenewable resources, including fossil fuels; natural gas; water; and building materials, such as concrete. However, the Project and Project Alternatives involve the entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard, thereby delivering improved and direct public access to the Beverly Hills Business Triangle and do not represent an uncommon construction project that would use an extraordinary amount of raw material in comparison to other development projects of similar scope and magnitude. Additionally, the Project and Project Alternatives would reduce VMT in the region by encouraging people to take public transit and enhance the pedestrian network, thereby reducing the number of cars that operate in congested traffic conditions and transportation fuel use and the associated regional energy consumption (refer to Section 3.5 (Energy) for additional details). As such, the Project and Project Alternatives are not anticipated to consume substantial amounts of energy or use other resources in a wasteful manner. Although the Project and Project Alternatives would result in the consumption of nonrenewable resources, the impact would not be considered significant.

5. COMPARISON OF PROJECT ALTERNATIVES

This section describes the evaluation process used to identify and compare the Project and Project Alternatives presented in the Westside Purple Line Wilshire/Rodeo Station North Portal Environmental Impact Report (EIR). Alternatives have been considered in this EIR to explore potential means to mitigate or avoid the significant environmental impacts associated with implementation of the Project while still achieving the primary objective of the Project.

5.1 Introduction

Pursuant to Section 15126.6(a) of the CEQA Guidelines, an EIR shall describe a range of reasonable alternatives, which may include alternatives to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. The CEQA Guidelines state that an EIR need not consider every conceivable alternative or consider alternatives that are infeasible. The alternatives analysis must include an evaluation of the No Project Alternative in accordance with Section 15126.6(e) of the CEQA Guidelines to determine the consequences of not implementing the project. Through the identification, evaluation, and comparison of alternatives, the relative advantages and disadvantages of each alternative can be determined.

5.1.1 Project Objectives

The fundamental purpose of the Project is to provide an entrance/exit to the Wilshire/Rodeo Station on the north side of Wilshire Boulevard thereby delivering improved and direct public access to the Beverly Hills Business Triangle, a prime local and regional destination and a key hub for tourism, shopping, and dining experiences. Specific objectives related to this fundamental purpose include:

- Provide direct access from the north side of Wilshire Boulevard to the Wilshire/Rodeo Purple Line Station
- Provide direct pedestrian access to jobs, retail, and amenities in the City's business triangle
- Improve pedestrian flow and avoid significant degradation of vehicular flow in the vicinity of the Wilshire/Rodeo Purple Line Stations
- Minimize pedestrian street crossings on Wilshire Boulevard

5.2 Alternatives Development Process

As discussed in Chapter 2 (Project Description), Metro engaged with the community and relevant stakeholders during the Westside Subway Extension Project Draft EIS/EIR phase in a series of Station Information Meetings in Fall 2009, to solicit input from the public regarding potential station entrance locations at the Wilshire/Rodeo Station. In February 2012, a Station Entrance Location Report and Recommendations was prepared by Metro to support the Westside Subway Extension Project Final EIS/EIR, to identify preferred station locations and entrance alternatives for the subway project, as well as to provide a rationale for screening

options down to a single entrance for inclusion within the Final EIS/EIR (Metro, 2012). The report provided a review and screening of the five station entrance alternatives considered for the Wilshire/Rodeo Station in the Draft EIS/EIR. Upon evaluation of the environmental inputs and engineering constraints, a single entrance located at the Ace Gallery site was selected as the preferred primary station entrance for the Wilshire/Rodeo Station. In November 2017, FTA issued a Supplemental EIS which stated that the Wilshire/Rodeo Station will be designed with a knockout panel, allowing for the development of a future station entrance on the north side of Wilshire Boulevard.

In 2018, in response to stakeholder requests, the City approached Metro to provide a North Portal entrance/exit for the Wilshire/Rodeo Station on the north side of Wilshire Boulevard. The three original set of build alternatives were developed through the Station Entrance Location Report and Recommendations (February 2012) as described in Section 2 (Project Description). Two potential station entrance/exit locations north of Wilshire Boulevard were re-introduced by the City as part of this current EIR process, which are located on the west side of Beverly Drive, north of Wilshire Boulevard, as well as on the west side of Cañon Drive north of Wilshire Boulevard. In addition, the City introduced a third potential station entrance/exit location north of Wilshire Boulevard, which is the construction staging yard established for the Section 2 project located along Wilshire Boulevard at the northwest corner of Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive.

With consideration of the community input provided through the September 2019 Public Scoping Meeting, the focus of the North Portal was to provide safe and direct access to the retail and business centers located north of Wilshire Boulevard, without the permanent closure of Cañon Drive. During this time, a potential fourth design option was introduced from local stakeholders which included modified portal design (2 stairs, 2 up/down escalators, 2 elevators) for the proposed alternative at the staging yard. This station entrance/exit alternative differs from the three original alternatives which include half portal design features (1 stair, 1 up escalator, 2 elevators). In December 2019, the Beverly Hills City Council approved to include the environmental analysis for a modified portal option in the EIR.

Further refinement of the range of alternatives continued through the pre-design process to determine those alternatives that could be eliminated from further consideration and those alternatives that would be carried forward for detailed analysis in the EIR. A discussion of the alternatives that were considered but ultimately dismissed and the reasons for their elimination is included in subsection 5.2.1 below.

5.2.1 Alternatives Considered but Dismissed from Detailed Analysis

Section 15126.6(c) of the CEQA Guidelines requires that an EIR identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Factors that may be used to eliminate alternatives from detailed consideration in the EIR are: (1) failure to meet most of the basic project objectives, (2) infeasibility, and (3) inability to avoid significant environmental impacts. The following alternative was eliminated from further consideration in the EIR.

Cañon Drive Alternative with Permanent Cañon Drive Closure

This option was considered as a result of input received from the community during the Public Scoping comment period. Currently, North Cañon Drive is temporarily closed at Wilshire

Boulevard to vehicular access due to the construction of the Wilshire/Rodeo Station for the Section 2 project. There were discussions amongst the public regarding maintaining this street closure even with the implementation of the Project to create a pedestrian plaza at the north side of the intersection of Wilshire Boulevard and Cañon Drive. The permanent closure of North Cañon Drive would include a cul-de-sac for vehicles traveling south on Cañon Drive and would eliminate vehicle access from Wilshire Boulevard. Following the public comment period, the Beverly Hills City Council denied the consideration of a permanent closure of North Cañon Drive as a result of input received from local stakeholders, which pointed out the economic and transportation impacts the temporary closure has had on their businesses since the street closure began, and therefore, a permanent closure could result in further economic and transportation impacts. Therefore, this alternative was considered to be infeasible, and was eliminated from detailed analysis.

5.2.2 Alternatives Carried Forward for Detailed Analysis

Through the alternatives refinement process, the range of alternatives considered for further evaluation was narrowed down to the four most feasible options, which are described below and shown on Figure 5-1. Finally, an analysis of the No Project Alternative is included as required according to Section 15126.6(e) of the CEQA Guidelines.

No Project Alternative

CEQA requires that existing conditions and the Project and Project Alternatives be evaluated against a No Project Alternative in an EIR. The No Project Alternative helps define mobility challenges in the areas adjacent to the Project and identifies the consequences of extending existing policies and plans without committing to larger capital improvements. The No Project Alternative represents the Project area in the year 2025 if the proposed north station entrance/exit is not built and construction of the previously approved Purple Line Extension Project would still occur, including a knockout panel on the north side of Wilshire Boulevard that was included in the design of the Wilshire/Rodeo Station. In addition, planned municipal projects would still be developed in the area. The detailed list of related projects is found in Chapter 2 (Project Description).

The Project (Beverly Drive)

The Project would include a half portal located on the west side of North Beverly Drive, within the existing street and sidewalk right-of-way, north of Wilshire Boulevard. The Project footprint would be approximately 9,200 square feet and would extend from its connection to the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 165 feet north up North Beverly Drive. Three levels would be provided at the proposed North Portal. The street level would be comprised of an entrance/exit, including two elevators, one stairway, and one “up” escalator. A covered canopy would also be located above the 12-foot-tall portal on the street level, which would be enclosed by a translucent glass exterior. The adjacent sidewalk would be extended. The intermediate stairway landing level would consist of a landing area serving as a transition between stairways. The walkway or concourse level would consist of an open area with adequate space for passengers to ingress and egress from the stairway, escalator, and elevators. The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates, and then to the Wilshire/Rodeo Station walkway previously approved in the Metro and FTA EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed.

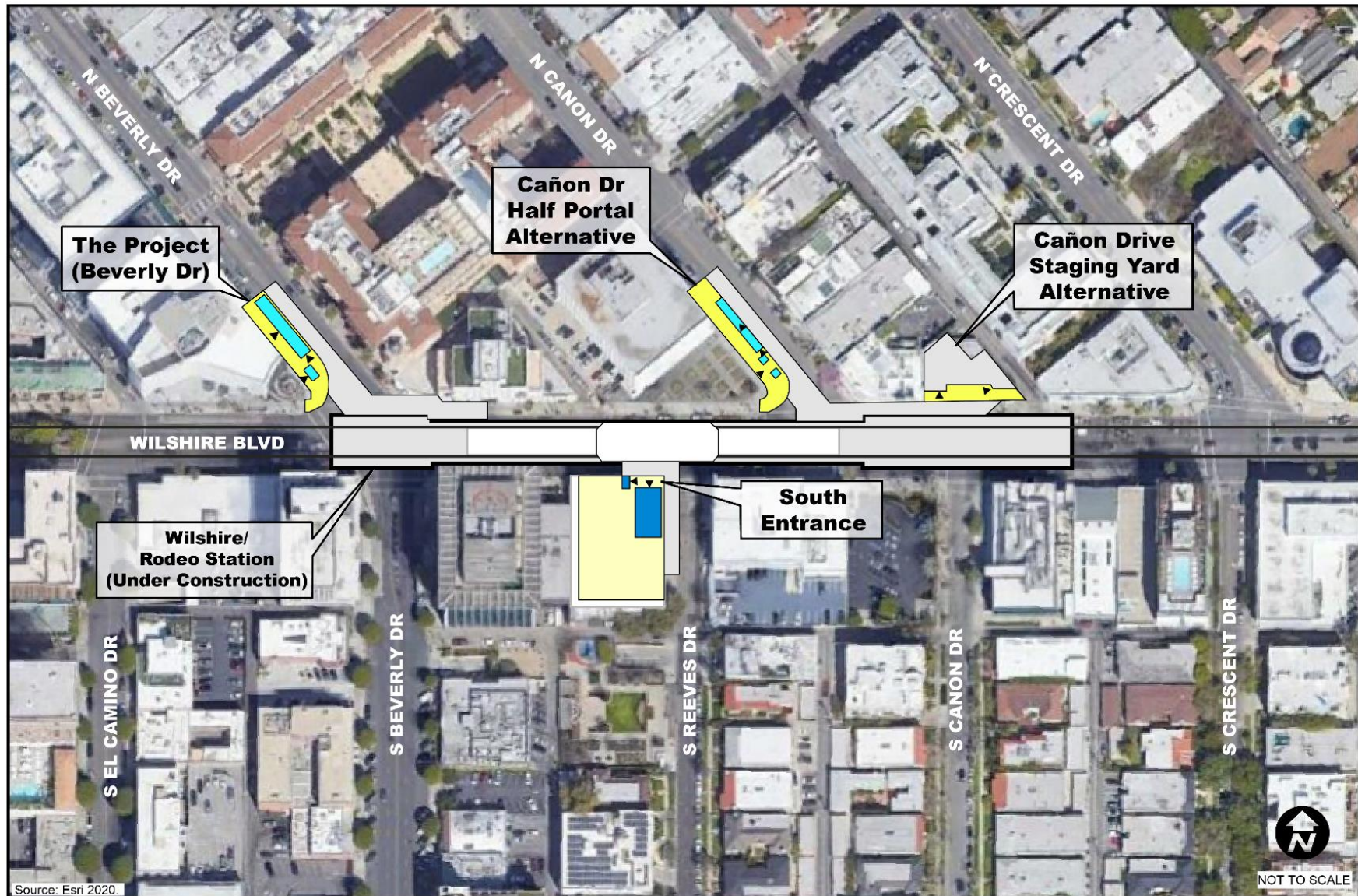


Figure 5-1 Purple Line Wilshire/Rodeo Station North Portal Project and Alternatives

Cañon Drive-Half Portal Alternative

The Cañon Drive-Half Portal Alternative would include a half portal located on the west side of Cañon Drive, within the existing street and sidewalk right-of-way, north of Wilshire Boulevard. The footprint would be approximately 8,100 square feet and would extend from its connection to the Wilshire/Rodeo Station at Wilshire Boulevard to approximately 195 feet north along North Cañon Drive.

Similar to the Project, the Cañon Drive-Half Portal Alternative would include three levels. The street level would comprise the North Portal entrance/exit, including two elevators, one stairway, and one “up” escalator. A covered canopy would also be located above the 12-foot-tall portal on the street level, which would be enclosed by a translucent glass exterior. The adjacent sidewalk would not be extended with this alternative. The intermediate stairway landing level would consist of a landing area serving as a transition between stairways. The walkway or concourse level shown on would consist of an open area with adequate space for passengers to ingress and egress from the stairway, escalator, and elevators. The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates, and then to the Wilshire/Rodeo Station walkway previously approved in the Metro and FTA EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed.

Cañon Drive Staging Yard Alternative

The Cañon Drive Staging Yard Alternative would be located within the construction staging yard established for the Section 2 project, as well as the adjacent public sidewalk, located along Wilshire Boulevard and the alley (adjacent to Crescent Drive) between Cañon Drive and Crescent Drive. The footprint of this alternative would be approximately 3,800 square feet and would occupy Assessor Parcel Numbers 4343-005-901 and 4343-005-900.

Similar to the Project and the Cañon Drive Alternative, the Cañon Drive Staging Yard Alternative would include three levels. The street level would comprise the North Portal entrance/exit, including two elevators, one stairway, and an “up” escalator. A covered canopy would also be located above the 12-foot-tall portal on the street level, which would be enclosed by a translucent glass exterior. The adjacent sidewalk would not be extended with this alternative. The Cañon Drive Staging Yard Alternative would also include an approximately 52-foot-tall ventilation shaft at the southeastern corner of the site. This tunnel ventilation shaft is required by Metro to be at least 40 feet from openings such as station entrances or portals. Due to the limited space available on the site this cannot be achieved by separating the shaft opening horizontally. Instead the opening is raised, resulting in a vertical shaft structure that extends 40 feet above the portal in order to satisfy the Metro requirement. The intermediate stairway landing level would consist of a landing area serving as a transition between stairways. The walkway or concourse level would consist of an open area with adequate space for passengers to enter and exit from the stairway, escalator, and elevators. The open area would also include a Metro ticket purchasing area followed by a passageway or walkway leading to the fare and turnstile gates, and then to the Wilshire/Rodeo Station walkway previously approved in the Metro and FTA EIS/EIR. Other minor supporting elements or ancillary facilities would also be provided as needed.

Additionally, this alternative could have a second escalator if a small below-ground portion of the adjacent parcel to the west (Assessor Parcel Number 4343-005-004) were utilized. This

would result in additional land to be acquired by the City. Adding a second escalator would require approximately 900 square feet of this parcel, with all of it below-ground, therefore, not increasing the surface square footage of this alternative.

Aesthetic changes would be very minimal, construction impacts would not change, and any increase in excavation would be minimal and would be less than, or equal to, the other two project alternatives. The adjacent parcel is currently being used as part of the construction staging yard by Metro and was previously a commercial development. Therefore, the addition of this escalator would not result in any significant changes to the assumptions and analysis in this EIR.

5.3 Project Objective Conformance

Chapter 2 (Project Description) outlines the primary objectives of the project as also listed above under section 5.1.1 Project Objectives. Analysis of how well the Project and each alternative would fulfill the project objectives is summarized in Table 5-1 (Project Objective Conformance) and discussed below.

Table 5-1 Project Objective Conformance

Objective	No Project Alternative	The Project	Cañon Drive-Half Portal Alternative	Cañon Drive Staging Yard Alternative
Objective 1: Provide direct access from the north side of Wilshire Boulevard to the Wilshire/Rodeo Station Purple Line Station	○	●	●	●
Objective 2: Provide direct pedestrian access to jobs, retail, and amenities in the City's business triangle	○	●	●	◐
Objective 3: Improve pedestrian flow and avoid significant degradation of vehicular flow in the vicinity of the Wilshire/Rodeo Purple Line Station	○	●	●	●
Objective 4: Minimize pedestrian street crossings on Wilshire Boulevard	○	●	●	◐

SOURCE: AECOM, 2020

● = Good Conformance ◐ = Moderate Conformance ○ = Poor Conformance

5.3.1 Provide Direct Access to Jobs, Retail, and Amenities

The Project and Cañon Drive-Half Portal Alternative would meet this objective by providing a station entrance/exit north of Wilshire Boulevard that provides direct access to the Beverly Hills Business Triangle which serves as a major employment and destination center. The Cañon Drive Staging Yard Alternative moderately meets this objective due to the further distance from the alternative to the Beverly Hills Business Triangle. The No Project Alternative would not provide a station entrance/exit north of Wilshire Boulevard.

5.3.2 Improve Pedestrian Flow

The Project and Cañon Drive-Half Portal Alternative would meet this objective by providing improved access north of Wilshire Boulevard by allowing pedestrians direct access to jobs and retail services with a safe and efficient pathway to businesses located north of the Rodeo/Wilshire Boulevard station. The Cañon Drive Staging Yard Alternative moderately meets this objective due to the additional distance and street crossing between this alternative and the Beverly Hills Business Triangle. The No Project Alternative would not provide direct access north of Wilshire Boulevard.

5.3.3 Minimize Pedestrian Street Crossings

The Project and Cañon Drive-Half Portal Alternative would meet this objective by providing direct access to the businesses and retail services north of Wilshire Boulevard by providing a safe and secure pathway along Wilshire Boulevard for pedestrians to safely access jobs and retail services located north of the Wilshire/Rodeo Station. The Cañon Drive Staging Yard Alternative moderately meets this objective due to the additional street crossing between this alternative and the Beverly Hills Business Triangle. The No Project Alternative would not provide direct access to the businesses and retail services north of Wilshire Boulevard.

5.4 Environmental Performance

The Project and Project Alternatives have been evaluated in detail throughout Chapter 3 of the Draft EIR. An overview of these alternatives and a summary of impacts are provided below in Table 5-2 (Summary Comparison of Project Alternatives).

Table 5-2 Summary Comparison of Project and Project Alternatives

Environmental Considerations	No Project Alternative	The Project (Beverly Drive)	Cañon Drive-Half Portal Alternative	Cañon Drive Staging Yard Alternative
Aesthetics & Visual Quality	IV	II	II	II
Air Quality	IV	II	II	II
Biological Resources	IV	II	II	II
Cultural Resources	IV	II	II	II
Energy	IV	II	II	II
Geology, Soils & Mineral Resources	IV	II	II	II
Greenhouse Gas Emissions	IV	II	II	II
Hazards & Hazardous Materials	IV	II	II	II
Hydrology & Water Quality	IV	II	II	II
Noise	IV	I	I	I
Public Services	IV	II	II	II
Transportation	IV	II	II	II
Tribal Cultural Resources	IV	II	II	II
Utilities & Service Systems	IV	III	III	III
Other CEQA Considerations*	IV	IV	IV	IV

SOURCE: AECOM, 2020

Note: *Other CEQA Considerations include: Agricultural/Forestry, Land Use and Planning, Population and Housing, Recreation, Wildfire, and Growth Inducement

I: Significant Unavoidable Impact

II: Less Than Significant Impact with Mitigation

III: Less Than Significant Impact

IV: No Impact

5.4.1 Alternatives Comparison Summary

The Project and Project Alternatives are evaluated in detail throughout Chapter 3 of the EIR. An overview of these alternatives and a summary of impacts and mitigation measures are provided below.

No Project Alternative

As no development would occur under the No Project Alternative, no construction or operation impacts would occur. The No Project Alternative is used for comparison purposes in order to assess the relative benefits and impacts of constructing a new transit project versus only constructing projects which are already funded and planned for in local plans. Therefore, the No Project Alternative would avoid potentially significant impacts to all environmental considerations and would have no impact.

Aesthetics & Visual Quality

The Project and Project Alternatives

Visual or aesthetic impacts would be experienced during nighttime construction for the Project and Project Alternatives as a result of lighting, including limited amounts of glare, that could spill over onto the hotel uses which are adjacent to the Project and Project Alternatives. With the implementation of Mitigation Measure AES-B, construction impacts related to the creation of a substantial source of light or glare that would result in adverse effects to day/nighttime views of the area would be less than significant.

Cañon Drive Staging Yard Alternative

Visual or aesthetic impacts would occur due to the proposed approximately 52-foot-tall ventilation shaft that would be visible on the south eastern portion of the site, directly adjacent to Wilshire Boulevard. The ventilation shaft does represent a taller new feature that would be noticed by viewers. With the implementation of Mitigation Measure AES-A, public art, or other visual or architectural features would be implemented on the ventilation shaft to ensure the structure would be visually consistent with the existing environment and the impact would be less than significant.

Air Quality

The Project and Project Alternatives

Air quality impacts would be experienced for the Project and Project Alternatives and could result in short-term odor emissions from diesel exhaust associated with construction equipment. Measures would be implemented that are described in the MOA between the City and Metro. The implementation of Mitigation Measures AIR-A through AIR-C would further reduce construction air quality emissions below the threshold. The implementation of Mitigation Measures AIR-A through AIR-D would reduce TAC emissions exposure to sensitive receptors during construction. In addition, Mitigation Measures AIR-A, AIR-B, AIR-D, and AIR-E are intended to further reduce other emissions, including those leading to odors. With the implementation of mitigation, construction air quality impacts would be less than significant.

Biological Resources

The Project (Beverly Drive)

Biological resources impacts would occur under the Project due to the removal of ornamental trees. Four ornamental trees located on the west side of Beverly Drive would require relocation within the site, but one ornamental tree would be permanently removed and potentially relocated elsewhere in the area as feasible. In addition, indirect impacts to bird species protected by the MBTA and CFGC could occur and result in increased nestling mortality due to nest abandonment or decreased feeding frequency. By implementing and adhering to avoidance and minimization measures provided in Mitigation Measure BIO-A, direct and indirect impacts of tree removal and construction on nesting birds that could utilize ornamental trees would be less than significant.

Project Alternatives

Biological resources impacts would occur under the Cañon Drive-Half Portal Alternative due to the removal of ornamental trees along Cañon Drive. For the Cañon Drive-Half Portal Alternative, five trees located on the west side of Cañon Drive would be permanently removed, and potentially relocated elsewhere in the area as feasible. No trees would be removed for the Cañon Drive Staging Yard Alternative. In addition, indirect impacts to bird species protected by the MBTA and CFGC could occur and result in increased nestling mortality due to nest abandonment or decreased feeding frequency. By implementing and adhering to avoidance and minimization measures provided in Mitigation Measure BIO-A, direct and indirect impacts of tree removal and construction on nesting birds that could utilize ornamental trees would be less than significant.

Cultural Resources

The Project (Beverly Drive)

Direct impacts to cultural resources would occur due to sidewalk closure, cut and cover piling and excavation adjacent to (less than 10 feet from) the Wilshire Beverly Center and the California Bank Building. Construction of the Project may also require the temporary removal and subsequent reinstatement of the boxed canopy on the east elevation of the Wilshire Beverly Center, which would materially alter the Wilshire Beverly Center temporarily. However, with implementation of Mitigation Measure CUL-A, direct construction impacts related to historical resources would be less than significant.

In addition, significant impacts to two historical resources would occur as a result of subsurface construction activities that may cause differential settlement or vibration due to piling and excavation activities next to the foundations of the Wilshire Beverly Center and the California Bank Building. However, with implementation of Mitigation Measure CUL-B, construction impacts related to historical resources would be less than significant.

The archaeological records search and survey identified no archaeological resources within or adjacent to the Project site. However, unknown resources may exist below grade within the Project site. As such, there is potential to encounter previously undiscovered archaeological resources during construction activities. With implementation of Mitigation Measure CUL-C, construction impacts related to archaeological resources would be less than significant.

Cañon Drive-Half Portal Alternative

Similar to the Project, direct impacts to cultural resources would occur for the Cañon Drive-Half Portal Alternative due to sidewalk closure, cut and cover piling and excavation adjacent to (less than 15 feet from) the Beverly Hills Financial Center. Although construction activities would be similar to the Project, construction of the Cañon Drive-Half Portal Alternative would not demolish, destruct, relocate, or materially alter the Beverly Hills Financial Center; therefore, the Cañon Drive-Half Portal Alternative would not result in direct impacts to that historical resource.

In addition, significant impacts to the one historical resource would occur as a result of subsurface construction activities that may cause differential settlement or vibration due to piling and excavation next to the foundation of the Beverly Hills Financial Center. With implementation of Mitigation Measure CUL-B, construction impacts related to historical resources would be less than significant.

Similar to the Project, the archaeological records search and survey identified no archaeological resources within or adjacent to the Cañon Drive-Half Portal Alternative site. However, unknown resources may exist below grade within the Cañon Drive-Half Portal Alternative site. As such, there is potential to encounter previously undiscovered archaeological resources during construction activities. With implementation of Mitigation Measure CUL-C, construction impacts related to archaeological resources would be less than significant.

Cañon Drive Staging Yard Alternative

Compared to the Project and Cañon Drive-Half Portal Alternative, there are no historical resources in the immediate vicinity of the Cañon Drive Staging Yard Alternative that would be impacted by the construction or operation of this alternative. Therefore, construction and operational impacts related to historical resources would be less than significant.

Similar to the Project and Cañon Drive-Half Portal Alternative, the archaeological records search and survey identified no archaeological resources within or adjacent to the Cañon Drive Staging Yard Alternative. However, unknown resources may exist below grade within the Cañon Drive Staging Yard Alternative site. As such, there is potential to encounter previously undiscovered archaeological resources during construction activities. With implementation of Mitigation Measure CUL-C, construction impacts related to archaeological resources would be less than significant.

Energy

The Project and Project Alternatives

Direct impacts to energy consumption would occur during the implementation of the Project and Project Alternatives and would increase energy consumption for the duration of construction in the form of electricity, natural gas, and fossil fuels (e.g., gasoline, diesel fuel). The implementation of Mitigation Measures AIR-A and AIR-B would further reduce energy consumption below the threshold by limiting idling of heavy construction equipment and requiring maintenance and tuning of engines. With the implementation of mitigation, construction energy impacts would be less than significant.

The Project and Project Alternatives are not anticipated to result in an increase in vehicle trips. The Project and Project Alternatives would promote the use of transit and enhance the pedestrian network; thus, reducing transportation fuel use and the associated regional energy consumption by reducing the amount of vehicle miles traveled, and the number of cars that operate in congested traffic conditions. Therefore, the Project and Project Alternatives would not result in potentially significant environmental impact on energy consumption.

Geology, Soils & Minerals

The Project and Project Alternatives

Direct impacts to geology, soils and minerals that would result in the risk of loss, injury or death due to the rupture of a known earthquake, strong seismic ground shaking, liquefaction or landslides would not occur with implementation of the Project and Project Alternatives. Although the Beverly Hills fault zone traverses the City and is located approximately 500 feet north of the Project and Project Alternatives footprint, no active faults are known to cross any of the Project Alternative footprints. The impact to people, buildings, or structures on or near the Project and Project Alternatives sites from strong seismic ground shaking would be reduced by the required

conformance with applicable building codes, and accepted engineering practices, therefore impacts related to strong seismic ground shaking would be less than significant. However, subsidence could occur during construction. With the implementation of Mitigation Measure GEO-A, potential subsidence impacts would be mitigated by utilizing geotechnical exploration and, if necessary, slurry walls, secant pile walls, and other methods to minimize potential subsidence. The impact would be less than significant.

No fossil localities are known to exist within the three-dimensional Project and Project Alternatives sites below grade. However, the Project and Project Alternatives have the potential to impact unknown, buried paleontological resources that may exist within the older Quaternary alluvium at unknown depths within the Project and Project Alternatives sites. With the implementation of Mitigation Measure GEO-B, construction impacts related to directly or indirectly destroying unique paleontological resources or geologic features would be less than significant.

The Project and Project Alternatives RSAs are within the San Vicente oil field, however, there are no active wells within any of the RSAs. Therefore, construction and operational impacts related to the loss of availability of a known mineral resource that would be a value to the region and the residents of the state would be less than significant.

Greenhouse Gas Emissions

The Project and Project Alternatives

Direct impacts in exhaust-related GHG emissions would occur as a result of heavy-duty off-road equipment, materials transport, and worker commutes during construction of the Project and Project Alternatives. However, construction of the Project and Project Alternatives would not exceed SCAQMD's adopted significance threshold of 10,000 MT CO₂e per year, the adjusted SB 32 threshold of 6,000 MT CO₂e per year, nor the annual SMAQMD threshold of 1,100 MT CO₂e.

In addition, the Project and Project Alternatives would generate energy source emissions that would result in indirect GHG emissions associated with electricity consumption for lighting and escalator and elevator use but would not generate GHG emissions that exceed the established thresholds. The Project and Project Alternatives would not conflict with any applicable plan, policy, or regulation for the purpose of reducing GHG emissions. The implementation of Mitigation Measures AIR-A through AIR-C would further reduce construction GHG emissions below the threshold. With the implementation of mitigation, construction greenhouse gas emissions impacts would be less than significant.

Hazards & Hazardous Materials

The Project and Cañon Drive-Half Portal Alternative

The Project would require removal of the majority of the southbound right-turn pocket on the west side of Beverly Drive, just north of Wilshire Boulevard. The proposed configuration of the Project would consist of one through lane and one shared through-right-turn lane on the southbound Beverly Drive approach. As permanent changes to the configuration of Beverly Drive would continue to allow for the passage of both north and south bound traffic, operation of the Project would not impair implementation of or physically interfere with an emergency response or evacuation plan.

The Cañon Drive-Half Portal Alternative would not permanently take any traffic lanes. Cañon Drive would continue to allow for the passage of both north and south bound traffic, operation of the Cañon Drive-Half Portal Alternative would not impair implementation of or physically interfere with an emergency response or evacuation plan.

Implementation of Mitigation Measures TRA-A through TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (Section 3.12, Transportation) and would ensure that any potential impacts to emergency response plans or emergency evacuation plans are less than significant. In addition, upon implementation of Mitigation Measure HAZ-A, potentially significant impacts related to the routine transport, use, or disposal of contaminated groundwater and soils during construction would remain less than significant.

Cañon Drive Staging Yard Alternative

The Cañon Drive Staging Yard Alternative would not require any permanent changes to roads. Similar to the Project and Cañon Drive-Half Portal Alternative, the implementation of Mitigation Measures TRA-A through TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction (Section 3.12, Transportation) and would ensure that any potential impacts to emergency response plans or emergency evacuation plans are less than significant. In addition, upon implementation of Mitigation Measure HAZ-A, potentially significant impacts related to the routine transport, use, or disposal of contaminated groundwater and soils during construction would remain less than significant.

Hydrology & Water Quality

The Project and Project Alternatives

Direct impacts to water quality, groundwater supplies and water quality control plans or groundwater management plans would occur as a result of utility relocations, piling, and excavation which have the potential to degrade water quality through the exposure of surface runoff to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Dewatering would be required for the piling activities, therefore dewatering permits from the City of Beverly Hills and LARWQCB would be required prior to construction. The ESCP developed for the Project or Project Alternatives would require implementation of site-specific construction erosion BMPs, which may include temporary sediment control BMPs; waste management BMPs; erosion control BMPs; and non-stormwater management. In addition, any contaminated groundwater encountered would be managed by the implementation of Mitigation Measure HAZ-A (Section 3.8, Hazards and Hazardous Materials). With the implementation of mitigation measures and compliance with the County of Los Angeles' MS4 Permit, impacts related to water quality standards and waste discharge requirements would be less than significant.

Noise

The Project (Beverly Drive)

Direct impacts to ambient noise levels would exceed the existing ambient noise levels by more than 5 dBA at multiple sensitive receiver locations in the daytime, evening, and nighttime periods, respectively. The locations with direct impacts include the Maybourne Beverly Hills Hotel western façade balconies and rooftop area, the Beverly Cañon Gardens Park, and the

outdoor sidewalk seating areas associated with the shops on South Beverly Drive. These locations are located closest to the construction area and there is a lack of intervening structures, and the implementation of the standard noise barrier fencing would not reduce noise levels below a level of significance.

Mitigation Measures NOI-A through NOI-I would be implemented in order to reduce construction-related noise impacts. Nonetheless, even after the implementation of Mitigation Measures NOI-A through NOI-I, construction equipment could still result in a 5 dBA increase over the ambient noise level. Therefore, impacts related to temporary construction equipment noise would be significant and unavoidable.

Cañon Drive-Half Portal Alternative

Similar to the Project, Cañon Drive-Half Portal Alternative direct impacts to ambient noise levels would exceed the existing ambient noise levels by more than 5 dBA. Compared to the Project, two sensitive receiver locations would be impacted in the daytime, evening, and nighttime periods. The locations with direct impacts include the Citibank Building Plaza outdoor plaza area and the Spago Restaurant outdoor dining area. These locations are closet to the construction area and there is a lack of intervening structures, and the implementation of the standard noise barrier fencing would not reduce noise levels below a level of significance.

Mitigation Measures NOI-A through NOI-I would be implemented in order to reduce construction-related noise impacts. Nonetheless, even after the implementation of Mitigation Measures NOI-A through NOI-I, construction equipment could still result in a 5 dBA increase over the ambient noise level. Therefore, impacts related to temporary construction equipment noise would be significant and unavoidable.

Cañon Drive Staging Yard Alternative

Similar to the Cañon Drive-Half Portal Alternative, direct impacts to ambient noise levels would exceed the existing ambient noise levels by more than 5 dBA at two sensitive receiver locations. The AKA Beverly Hills Hotel balconies and terraces would be impacted during the daytime, evening, and nighttime periods. In addition, the single- and multi-family residential uses on South Canon Drive, approximately 200 feet south of Wilshire Boulevard, would be impacted during the daytime and nighttime periods.

The noise increase would be temporary and intermittent but nonetheless would exceed the threshold, even with the presence of standard noise barrier fencing around the construction area. Mitigation Measures NOI-A through NOI-I would be implemented in order to reduce construction-related noise impacts. Nonetheless, even after the implementation of Mitigation Measures NOI-A through NOI-I, construction equipment could still result in a 5 dBA increase over the ambient noise level. Therefore, impacts related to temporary construction equipment noise would be significant and unavoidable.

Public Services

The Project and Project Alternatives

Impacts to fire protection services and emergency response times would occur for the Project and Project Alternatives as a result of the presence of construction vehicles and increased truck movements. In addition, access disruptions may occur due to the required lane closures

associated with each alternative. Detour routes to the site and access for emergency vehicles would be available adjacent to the Project and Project Alternatives, via Wilshire Boulevard.

In addition, the presence of construction vehicles and increased truck movements and road closures are expected to be temporary and intermittent; therefore, increased traffic congestion and access disruptions during construction could affect BHFD emergency response times. The implementation of Mitigation Measures TRA-A through TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction and would ensure that potential impacts to fire and police protection are less than significant for the Project and Project Alternatives.

Transportation

The Project (Beverly Drive)

Direct impacts to transportation would occur during operation of the Project due to the removal of the majority of the southbound right-turn pocket on the west side of Beverly Drive, just north of Wilshire Boulevard. The proposed configuration of the Project would consist of one through lane and one shared through-right-turn lane on the southbound Beverly Drive approach. It is anticipated that the new configuration will be designed using current roadway and intersection design guidelines as specified in the California Highway Design Manual (California Department of Transportation, 2019), and no design exceptions are anticipated. In addition, pedestrian crossings would be maintained. As such, the new intersection configuration is not anticipated to contain any hazardous geometric design features. Therefore, operation impacts related to substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses would be less than significant. In addition, the implementation of Mitigation Measures TRA-A through TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction resulting in less than significant construction traffic impacts.

Cañon Drive-Half Portal Alternative

Unlike the Project, the Cañon Drive-Half Portal Alternative would not require removal of a traffic lane during operations. The Cañon Drive-Half Portal Alternative would not affect the lane geometries at the intersection of Clifton Way and North Cañon Drive. However, this intersection is in close proximity to the Project and Project Alternatives and is the only remaining unsignalized intersection in the study area. A traffic signal would be installed to improve vehicle flows and pedestrian access to the station. It is anticipated that the new intersection configuration and traffic signal would be designed in conformance with design guidelines as specified in the California Highway Design Manual (California Department of Transportation, 2019), and no design exceptions are anticipated. As such, the new intersection configuration and traffic signal are not anticipated to contain any hazardous geometric design features. Therefore, operation impacts related to substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses would be less than significant. In addition, Cañon Drive would be closed at Wilshire Boulevard during construction. The implementation of Mitigation Measures TRA-A through TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction resulting in less than significant construction traffic impacts.

Cañon Drive Staging Yard Alternative

The Cañon Drive Staging Yard Alternative would not affect the lane geometries on North Cañon Drive or Wilshire Boulevard. In addition, this alternative would not affect the adjacent alley. The intersection of Clifton Way and North Cañon Drive is approximately 400 feet from the Cañon Drive Staging Yard Alternative and is the only remaining unsignalized intersection in the study area. Similar to the Cañon Drive-Half Portal Alternative, a traffic signal would be installed to improve vehicle flows and pedestrian access to the station. It is anticipated that the traffic signal would be designed in conformance with design guidelines as specified in the California Highway Design Manual (California Department of Transportation, 2019). As such, the new traffic signal is not anticipated to contain any hazardous geometric design features. Therefore, operational impacts related to substantially increase hazards due to geometric design features (such as sharp curves or dangerous intersections) or incompatible uses would be less than significant. In addition, the implementation of Mitigation Measures TRA-A through TRA-D would provide traffic control plans, designated haul routes, a TMP, and coordination for emergency vehicle access to minimize disruptions during construction resulting in less than significant construction traffic impacts.

Tribal Cultural Resources

The Project and Project Alternatives

There are no previously identified archaeological resources associated with Native American tribes within a one-mile radius of the Project and Project Alternatives sites, and no tribal cultural resources were identified in the archival research. However, both the NAHC and Native American representatives contacted indicated that the area is sensitive for potential tribal cultural resources. Mitigation Measures TCR-A and TCR-B would be implemented to protect unknown tribal cultural resources that could be encountered during construction of the Project and Project Alternatives. Therefore, construction impacts related to tribal cultural resources that are a significant resource determined by the lead agency would be less than significant.

Utilities and Service Systems

The Project (Beverly Drive)

Direct impacts to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities would occur as a result of utility relocations. The Project would require the relocation of a fiber optic line, two storm drains and street lighting, which are all owned and operated by the City. The relocation of the fiber optic line would be limited to the immediate area adjacent to the Project and would focus on the Project footprint; thereby minimal disruption would occur to nearby residences and businesses. In addition, a fire hydrant and 6-inch-diameter water main are present on the north side of Wilshire Boulevard and Beverly Boulevard that may require relocation. There may be temporary disruption of service to nearby residences and businesses, but notification would be given at least 30 days of notice so impacts would be less than significant.

Compliance with applicable regulations would ensure that the Project would accommodate all stormwater runoff. Stormwater BMPs would be implemented during construction and operation of the Project to lessen the amount of runoff from the Project site to the maximum extent practicable. In addition, with implementation of BMPs and coordination with the appropriate

utility service provider, construction activities would have minimal impacts on utility services in the area, therefore, would be less than significant.

Cañon Drive-Half Portal Alternative

Similar to the Project, direct impacts to the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities would occur as a result of utility relocations. This alternative would require utility relocations of a fiber optic line, a water line, fire hydrant, storm drain and catch basin, and street lighting. Both temporary and permanent power would be required for lighting, dewatering pumps and to operate ventilation fans and utility connections such as water and power would also be required. The relocation of the fiber optic line would be limited to the immediate area adjacent to the Cañon Drive-Half Portal Alternative and focus on the project footprint; thereby minimal disruption would occur to nearby residences and businesses.

Although construction activities have the potential to affect utilities due to interruption of service while utilities are being relocated, utility service provider coordination and implementation of BMP's such as residential and business notifications would minimize impacts on utility services. Therefore, impacts related to relocation or construction of new or expanded water, storm water drainage, electric power, and telecommunications facilities during construction would be less than significant.

Cañon Drive Staging Yard Alternative

Compared to the Project and Cañon Drive-Half Portal Alternative, the Cañon Drive Staging Yard Alternative would require electric power, water, and telecommunication system relocations for the underground walkway between the North Portal and the concourse within the station. Additional utility relocation work is expected to be minimal because the utilities have already been planned for the Wilshire/Rodeo Station and would be simply re-routed for construction of this alternative. Therefore, impacts related to relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities during construction would be less than significant.

Other CEQA Considerations

The Project and Project Alternatives

Direct impacts to other CEQA considerations including agricultural/forestry resources, land use planning, population and housing, recreation, wildfire, and growth-inducement impacts would not occur with the implementation of the Project and Project Alternatives.

5.4.2 Environmentally Superior Alternative

In accordance with CEQA Guidelines Section 15126.6, an EIR shall identify an environmentally superior alternative among the feasible alternatives. As discussed above and shown in Table 5-2, the No Project Alternative would not result in significant impacts to any environmental considerations. The Project and Project Alternatives would result in similar impacts, all having temporary construction impacts related to aesthetics, air quality, biological resources, cultural resources, energy, geology/soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, noise, public services, transportation, and tribal cultural resources. The implementation of mitigation measures would reduce significant construction impacts to less

than significant and ensure other impacts would remain at a less than significant level, except for the issue area of construction noise. The Project and Project Alternatives would result in temporary significant and unavoidable construction noise impacts that may not be reduced with the implementation of mitigation measures. However, the Cañon Drive Staging Yard Alternative would result in the fewest environmental impacts overall and less permanent environmental impacts. This alternative would not require permanent closure of any traffic lanes and would require less excavation activities that could impact the environment. Therefore, the Cañon Drive Staging Yard Alternative would be considered the environmentally superior alternative.

6. ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
amsl	above mean sea level
APE	Area of Potential Effects
ARB	California Air Resources Board
AQMP	Air Quality Management Plan
BHMC	Beverly Hills Municipal Code
BHFD	Beverly Hills Fire Department
BHPD	Beverly Hills Police Department
BHUSD	Beverly Hills Unified School District
BMP	Best Management Practice
BSA	Biological Study Area
C-3	Commercial
CA-27	California Route 27
CAA	Clean Air Act
CAAQA	California Ambient Air Quality Standards
CalEEMod	California Emissions Estimator Model
Cal/OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California building code
CCA	California Coastal Act
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act of 1970
CESA	California Endangered Species Act
CFR	Code of Federal Regulations
CH ₄	methane
Chase Bank	Wilshire Beverly Center
City	City of Beverly Hills
CMP	Congestion Management Program
CNDDB	California Natural Diversity Data Base
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalents
CPUC	California Public Utilities Commission
CRHR	California Register of Historical Resources
CRMMP	cultural resources monitoring and mitigation plan
CRPR	California Rare Plant Ranks
CWA	Clean Water Act
CWC	California Water Code
dB	decibel
dBA	A-weighted decibel scale
DTSC	California Department of Toxic Substances Control

DU	dwelling unit
EIR	Environmental Impact Report
EIS/EIR	Environmental Impact Statement/Environmental Impact Report
EO	Executive Order
ESCP	Erosion and Sediment Control Plan
FC&G	Metro's Fare Collection & Gating system
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FIRM	Federal Insurance Rate Map
FTA	Federal Transit Administration
GHG	greenhouse gas
GIS	Geographic information systems
GWP	global warming potential
HFC	hydrofluorocarbon
HRI	Historic Resources Inventory
Hz	Hertz
KOP	Key Observation Point
LACPW	Los Angeles County Public Works
LARWQCB	Los Angeles Regional Water Quality Control Board
L _{eq}	Equivalent Noise Level
L _{max}	maximum noise level
LOS	level of service
LPA	Locally Preferred Alternative
LST	local significance threshold
LUST	leaking underground storage tank
L _v	Vibration Level
MBTA	Migratory Bird Treaty Act of 1918
Metro	Los Angeles County Metropolitan Transportation Authority
MG	million gallons
MGD	million gallons per day
mg/m ³	milligrams per cubic meter
MOA	Memorandum of Agreement
MPO	metropolitan planning organizations
MT	metric ton
MWD	Metropolitan Water District
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NF ₃	Nitrogen trifluoride
NHTSA	National Highway Traffic Safety Agency
NO	nitric oxide
NO ₂	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NOP	Notice of Preparation
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
NRHP	National Register of Historic Places
OSHA	Occupational Safety and Health Administration
OPR	Governor's Office of Planning and Research

PFC	perfluorocarbon
PM	particulate matter
PM _{2.5}	Particulate Matter less than 2.5 microns in diameter
PM ₁₀	Particulate Matter less than 10 microns in diameter
ppb	parts per billion
ppm	parts per million
PPV	peak particle velocity
PRC	California Public Resources Code
PRMMP	Paleontological Resources Monitoring and Mitigation Plan
Project	Beverly Drive
Project and Project Alternatives	Collectively the Project (Beverly Drive), Cañon Drive-Half Portal Alternative, and the Cañon Drive Staging Yard Alternative
RCNM	Roadway Construction Noise Model
RMS	root mean square
ROG	reactive organic gases
ROW	right-of-way
RSA	resource study area
RTIP	Regional Transportation Improvement Program
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SAFE	Safer Affordable Fuel Efficient
SB	Senate Bill
SCAB	South Coast Air Basin
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCCIC	South Central Coastal Information Center
SCE	Southern California Edison
Scoping Plan	CARB Climate Change Scoping Plan
SEA	Significant Ecological Areas
SF	square feet
SGMA	Sustainable Groundwater Management Act
SHPO	State Historic Preservation Office
SIP	State Implementation Plan
SO ₂	Sulfur Dioxide
Sterling Plaza	California Bank Building
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TDM	Transportation Demand Management
TMP	Traffic Management Plan
µg/m ³	micrograms per cubic meter
UBC	Uniform Building Code
UPE	Under Platform Exhaust
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UST	underground storage tank
Vdb	decibel notation to measure root mean square

VMT	vehicle miles traveled
VOC	volatile organic compounds
WoS	waters of the State
WoUS	waters of the U.S.

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