

# **Beverly Hills Creative Offices Specific Plan Project Initial Study**

*Prepared by*

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# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
BHCO	Beverly Hills Creative Office
BHFD	Beverly Hills Fire Department
BHPD	Beverly Hills Police Department
BHUSD	Beverly Hills Unified School District
CalGEM	California Geologic Energy Management Division
CARB	California Air Resources Board
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
City	City of Beverly Hills
CNDDDB	California Natural Diversity Database
CO	carbon monoxide
County	County of Los Angeles
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EOP	Emergency Operations Plan
FAR	floor area ratio
GHG	greenhouse gases
HMAP	Hazard Mitigation Action Plan
I	Interstate
IS	Initial Study
LID	Low Impact Development
LOS	level of service
Metro	Los Angeles County Metropolitan Transportation Authority
NAHC	Native American Heritage Commission
NCCP	NEGATIVE
NO <sub>x</sub>	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
PM <sub>10</sub>	particulate matter with an aerodynamic diameter equal to or less than 10 microns
PM <sub>2.5</sub>	particulate matter with an aerodynamic diameter equal to or less than 2.5 microns
project	Beverly Hills Creative Offices Specific Plan Project
RAW	Remedial Action Workplan
ROW	right-of-way
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SEA	Significant Ecological Area
SO <sub>x</sub>	sulfur oxides
SWPPP	Storm Water Pollution Prevention Plan
TMDL	total maximum daily load
USFWS	U.S. Fish and Wildlife Service
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	vehicle miles traveled

Acronym/Abbreviation	Definition
VOC	volatile organic compound
WEP	Water Enterprise Plan

# 1 Introduction

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## 1.1 Project Overview

The Beverly Hills Creative Offices Specific Plan Project (“Proposed Project” or “Project”) would involve construction and operation of up to 11 new office buildings in the City of Beverly Hills. The office buildings would be constructed within an approximately 2.49-acre site (“Project Site”), which consists of a 2.11-acre private property bound by Santa Monica Boulevard to the northwest, Beverly Boulevard to the northeast, and Civic Center Drive to the southeast and southwest, along with approximately 0.37 acres of public right-of-way surface area proposed to be vacated by the City and incorporated into the Project Site. In addition, the Project Site includes a subsurface area under existing public right-of-way that the applicant proposes the City to vacate. This subsurface area extends under Civic Center Drive a distance of 25 feet south from the existing southern parcel boundary. This proposed subsurface vacation is for a land area between 4 and 25 feet below the ground surface and is requested to allow the construction of a two-level subterranean parking structure. The office buildings would range between approximately 8,500 and 21,700 square feet (Buildings 5 and 6 combined) in size and 3 to 4 stories in height. The Project would be constructed in conjunction with or following implementation of a remediation plan at the Project Site, which is being prepared by the California Department of Toxic Substances Control (DTSC).

## 1.2 California Environmental Quality Act

The California Environmental Quality Act (“CEQA”), Public Resources Code Sections 21000 *et seq.*, applies to a “project,” which is defined under CEQA as an activity which may cause either a direct or reasonably foreseeable physical change in the environment, and which is initiated by, funded by, or requires discretionary approvals from state or local government agencies. (Public Resources Code § 21065.) The Proposed Project constitutes a “project,” as defined under CEQA. CEQA Guidelines Section 15367 states that a “Lead Agency” is “the public agency which has the principal responsibility for carrying out or approving a project.” Therefore, the City of Beverly Hills (City) is the Lead Agency responsible for compliance with CEQA for the Proposed Project.

The City has prepared an Initial Study (IS) in accordance with the CEQA Guidelines to determine if the Proposed Project could have the potential to cause significant adverse environmental impacts. Based on the conclusions of the Initial Study evaluation (contained in Section 3 of this document), the City has determined that the Proposed Project may have a significant effect on the environment and, therefore, the City will prepare an Environmental Impact Report (EIR) pursuant to CEQA. Since the analysis in the Initial Study determined that the Proposed Project would not result in significant impacts for some environmental categories, the City proposes to eliminate the following topics from further evaluation in the EIR: Agriculture and Forestry Resources, Biological Resources, Mineral Resources, Population and Housing, Public Services, Recreation, and Wildfire.

## 1.3 Project Location

The Project Site is located directly east of the City of Beverly Hills Civic Center area, which is the location of Beverly Hills City Hall, Fire Station #1, and the Police Station (which is closest to the Project Site). The Project Site has frontages along Santa Monica Boulevard, Civic Center Drive, and Beverly Boulevard, and is currently addressed

9220 North Santa Monica Boulevard, Beverly Hills. Below is a description of the Project Site's regional location, followed by a detailed description of the Project Site boundaries.

### **Regional Location**

The Project Site is located in the City of Beverly Hills, which covers 5.7 square miles in the Los Angeles Metropolitan Area. The City is located within the County of Los Angeles (County), approximately 9 miles northwest of downtown Los Angeles. Regional access to the Project area is available via the Interstate 10 (I-10), located approximately 3 miles south of the Project Site, and the Interstate 405 (I-405), located approximately 3.5 miles west of the Project Site. Figure 1-1 shows the regional location of the Project Site. Local access to the Project Site is provided via major north-south and east-west roadways including Santa Monica Boulevard, which forms the northwestern boundary of the Project Site; Beverly Boulevard, which forms the northeastern boundary of the Project Site; Wilshire Boulevard, located approximately 0.6 miles south of the Project Site; and Doheny Drive, located approximately 0.5 miles east of the Project Site.

### **Project Site Boundaries**

The Project Site is approximately 2.49 acres in size and is bound by Santa Monica Boulevard to the northwest, Beverly Boulevard to the northeast, and Civic Center Drive to the southeast and southwest (see Figure 1-2 for an outline of the Project Site). The Project Site consists of a 2.11-acre linear strip of private property known as "Parcel 12," which is made up of Assessor's Parcel Number 4342-015-038 and the western portion of Assessor's Parcel Number 4342-015-040. The applicant also seeks use of portions of adjacent public right-of-way (ROW) along Civic Center Drive totaling 0.37 acres, which are proposed to be incorporated into Parcel 12 as part of this Project. In addition, the applicant is proposing that subsurface area, extending 25 feet from the south property line of "Parcel 12" and located between 0 to 25 feet or 4 to 25 feet below ground surface, be vacated by the City and merged with the Project Site. Figure 1-3 shows the outline of Parcel 12 and the surface and subsurface areas of public ROW that would be vacated and added to Parcel 12 as part of this Project. For the purposes of this environmental analysis, the term "Project Site" refers to Parcel 12 plus both the surface and subsurface portions of ROW that the applicant seeks to have vacated by the City and incorporated into the project.

The Proposed Project also includes a Public Benefit component; "Parcel 13," a vacant strip of land currently owned by the Project applicant, and "the Triangle," a vacant triangular piece of land also owned by the Project applicant and located northeast of the Project site, would be dedicated to the City for public benefit purposes. These Public Benefit components of the Proposed Project are discussed in the Initial Study where applicable.



## 1.4 Environmental Setting

### Existing Land Uses

The Project Site is generally vacant under existing conditions and contains no buildings. Parcel 12 (a component of the Project Site, as described above) is surrounded by chain link fencing. Within the fence line, Parcel 12 is generally covered with a mix of small shrubs, hedges, grass, and patches of remnant concrete from prior railroad operations at the property.<sup>1</sup> There are also several street signs positioned along Parcel 12's Santa Monica Boulevard frontage. The surface portions of ROW that would be vacated and incorporated into Parcel 12 are currently occupied by surface parking spaces, landscaping, City wayfinding signage, and pavement. Since portions of the ROW proposed for vacating are below ground, some areas are currently occupied with subsurface utilities. Namely, water and telecommunication lines traverse the subsurface area in the eastern section of the Project Site. Additionally, an existing water line within Civic Center Drive extends along the border and just outside of the subsurface ROW proposed for vacating.

The Project Site is designated as Railroad on the City's General Plan land use map and is located within the T-1 Transportation Zone. Figures 1-4 and 1-5 show the General Plan and zoning designations for the Project Site and its surroundings.

### Prior Land Uses

Parcel 12 was occupied by a railroad ROW from 1926 to approximately 1998. The railroad, operated by the Pacific Electric Railway Company, was active from 1928 until between 1971 and 1979. The Union Pacific Railroad Company became successor owner and transferred Parcel 12 to the Beverly Hills Land Company in 1998. (The Project applicant is now the owner of the Beverly Hills Land Company.)<sup>2</sup> As a result of the prior railroad uses at the Project Site, the Project Site has residual concentrations of arsenic in its soil. The Union Pacific Railroad Company is working with DTSC to prepare a Remedial Action Workplan (RAW) to address and remove contaminated soil at the Project Site. A Draft RAW has been prepared and circulated for public review and comment; at the time of this writing, the RAW is still in draft form.

### Surrounding Land Uses

The property northwest of the Project Site, across Santa Monica Boulevard, includes Beverly Gardens Park, a 1.9-mile linear park that stretches from Wilshire Boulevard to Doheny Drive, zoned as Open Space. Further north are single-family residences on land zoned R-1.X (One-Family Residential Zone).

Land uses to the southwest of the Project Site consist of the City of Beverly Hills Civic Center, which contains buildings for City services, such as the Beverly Hills Police Department, Beverly Hills Fire Station #1, City Hall, and the Beverly Hills Public Library. Part of the Civic Center is zoned as C-3 (Commercial Zone) and part is unzoned but identified for use as parks, reservoirs, and/or government.

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<sup>1</sup> In 2015, the property owner's tree trimming contractor removed trees from Parcel 12 (part of the Project Site) and Parcel 13 (which is another private property located near Parcel 12). Some of the trees that were removed were on Parcel 12, and some were partially located on Parcel 12 and partially in the public right of way. For the purposes of this CEQA analysis, the baseline conditions used in the analysis are those that exist when the Notice of Preparation for an EIR is issued. The Notice of Preparation is being issued well after the tree removals occurred.

<sup>2</sup> There are various small fractional ownership interests within the Project Site that the Beverly Hills Land Company has recently purchased.

Properties to the south/southeast of the Project Site (fronting the south side of Civic Center Drive) are developed with office buildings and shops. Buildings range from one story to approximately four stories in height. Existing floor area for adjacent buildings include approximately 45,000 square feet for the building addressed 9348 and 9350 Civic Center Drive and approximately 102,000 square feet for the building addressed 9336 Civic Center Drive. The properties are generally zoned C-5 (Commercial Zone). Abutting the Project Site to the south is a diagonal strip of angled surface parking located within the Civic Center Drive right-of-way. (Portions of this surface parking area would be vacated and incorporated into Parcel 12 as part of the Proposed Project, and other surface portions would remain in the ROW.)

To the northeast of the Project Site, on the north side of Santa Monica Boulevard, are more areas of the Beverly Gardens Park, north of which area single-family residences within the R-1.X zone. To the northeast of the Project Site, on the south side of Santa Monica Boulevard, is a vacant strip of land (similar in appearance to the Project Site). This vacant strip of land is known as "Parcel 13" and is also currently owned by the Project applicant. Multi-family residential uses are south of Civic Center Drive, zoned R-4 (Multiple Residential Zone). Buildings are four to five stories in height.

#### Existing Public Services and Utilities in the Project Area

The Project Site is located in an urbanized area and is generally surrounded by existing commercial and residential development. As such, the Project area is supported by utilities and public services. Table 1-1 outlines the providers that would serve the Proposed Project.

**Table 1-1. Public Services & Utilities**

Service Type	Service Provider
Fire protection	Beverly Hills Fire Department
Police protection	Beverly Hills Police Department
Schools	Beverly Hills Unified School District
Library	Beverly Hills Public Library
Water supply	City of Beverly Hills Public Works Department
Sewer lines	City of Beverly Hills Public Works Department
Sewage treatment	City of Los Angeles (at the Hyperion Treatment Plant)
Gas supply	Southern California Gas Company
Electric supply	Southern California Edison
Telecommunications	AT&T, Verizon, Charter Communications, dark fiber providers
Stormwater drainage	City of Beverly Hills Public Works Department
Solid waste collection and disposal	Athens Services
Transit services	<p><i>Bus services:</i> Los Angeles County Metropolitan Transportation Authority (Metro), Antelope Valley Transit Authority, and Los Angeles Department of Transportation</p> <p><i>Trolley service:</i> City of Beverly Hills</p> <p><i>Future rail service:</i> Metro's purple line subway extension (two stations in Beverly Hills, anticipated to be completed in 2023 and 2025)</p>

An existing Metro bus stop is located at the intersection of Santa Monica Boulevard and Beverly Boulevard, adjacent to the northeast corner of the Project Site. The stop is serviced by Metro lines 4 and 14 and is marked with a sign along the sidewalk but does not have a bench or other improvements. The Project Site is not within a Transit Priority Area under existing conditions or anticipated future scenarios (SCAG 2019); however, transit services are located in the Project area, as shown in Table 1-1.<sup>3</sup>

## 1.5 References

CoStar Public Record. CRE Data Records Search. Accessed December 7, 2020. <https://www.costar.com/products/costarpublicrecord>.

SCAG (Southern California Association of Governments). 2019. Transit Priority Areas (2016) and Transit Priority Areas (2045) – SCAG Region. Web mapping applications. Last updated June 2019. Accessed June 23, 2020. [http://gisdata-scag.opendata.arcgis.com/datasets/c9249b6bba0f49829b67ce104f81ef20\\_1](http://gisdata-scag.opendata.arcgis.com/datasets/c9249b6bba0f49829b67ce104f81ef20_1).

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<sup>3</sup> A transit priority area is defined as an area within 0.5 mile of a major transit stop (Public Resources Code Section 21099). A major transit stop is defined as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. (Public Resources Code Section 21064.3.) The nearest existing rail transit stations are located over 0.5 mile from the Project Site. Two Metro purple line stations are proposed within the City. One station is located well over 0.5 mile from the Project Site. The other station is located within 0.5 mile from the southwestern edge of the Project Site.

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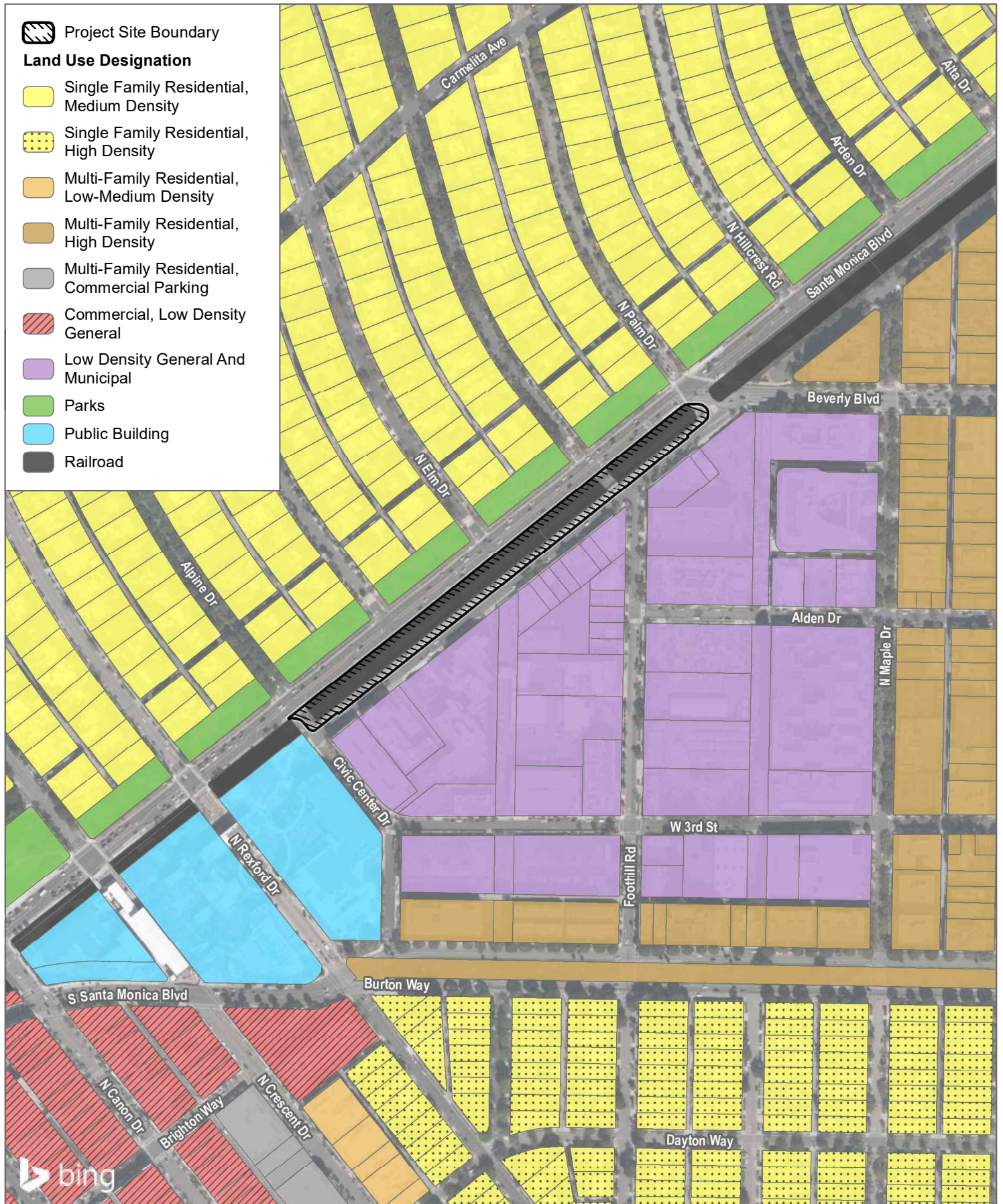
**FIGURE 1-3**

**Proposed Public Right-of-Way Vacations**

Beverly Hills Creative Offices Specific Plan Project

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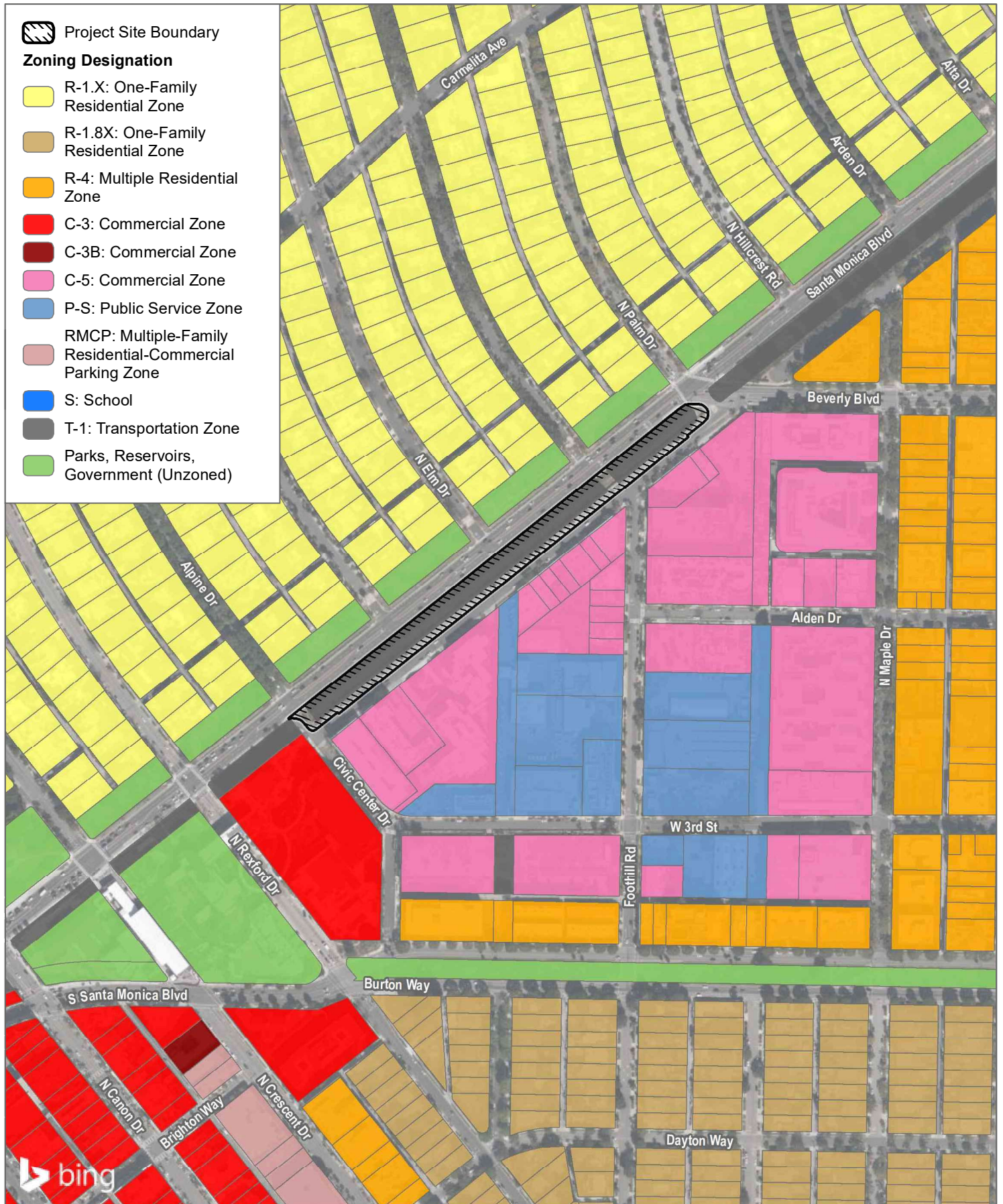




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## 2 Project Description

The Proposed Project would involve construction and operation of up to 11 new office buildings within the Project Site, the development of which would be governed under the proposed Beverly Hills Creative Offices Specific Plan (hereafter referred to as the “Specific Plan”). The office buildings would range between approximately 8,500 and 21,700 square feet (with Building 5 and 6 combined) in size and 3 to 4 stories in height. The buildings would have frontages on Santa Monica Boulevard and Civic Center Drive. The office buildings would be interspersed with landscaping and walkways. Parking would be provided in a 2-level subterranean garage beneath the Project Site. The Project would be constructed in conjunction with or following implementation of remediation at the Project Site, which is being prepared by the California Department of Toxic Substances Control (DTSC).

### 2.1 Project Design

The Specific Plan dictates the development of up to 11 office buildings, arranged in a linear fashion within the Project Site. Figure 2-1 shows a conceptual overview of the Proposed Project and provides number labels for each building. Table 2-1 below shows specifications for each of the proposed office buildings, as well as specifications for the other Project components. The Project is designed to attract individuals and companies engaged in creative media and entertainment industries, such as television, movies, or music. The buildings would provide high-end workspaces with indoor and outdoor work areas, high ceilings, open floorplans, and collaborative team spaces. Office spaces may include ancillary and accessory amenities typical of office uses, such as employee lunchrooms or cafeterias, lounges and patios, and fitness areas. Such amenities would be for employees and visitors of the on-site businesses only and would not be open to the public.

**Table 2-1. Proposed Project Summary**

Proposed Office Buildings	Building Number <sup>1</sup>	Office Uses (square feet)	Building Circulation Area (square feet) <i>stairways, elevators, mechanical rooms, etc.</i>	Total Building Area (square feet) <i>office uses plus circulation</i>
	Building 1	9,754	1,119	10,873
	Building 2	8,539	1,084	9,623
	Building 3	10,997	1,450	12,447
	Building 4	9,678	1,327	11,005
	Buildings 5 & 6	21,690	2,436	24,126
	Building 7	11,764	1,565	13,329
	Building 8	12,572	1,374	13,946
	Building 9	10,988	1,444	12,432
	Building 10	8,431	1,183	9,614
	Building 11	9,788	1,099	10,887
<b>Total building area</b>		128,282 square feet (does not include parking garage)		
<b>Total proposed floor area</b>		114,202 square feet (does not include building circulation, parking garage, or terraces)		
<b>Floor-Area-Ratio<sup>2</sup></b>		1.07 to 1.0		

**Table 2-1. Proposed Project Summary**

<b>Proposed Office Buildings</b>	<b>Building Number<sup>1</sup></b>	<b>Office Uses (square feet)</b>	<b>Building Circulation Area (square feet) stairways, elevators, mechanical rooms, etc.</b>	<b>Total Building Area (square feet) office uses plus circulation</b>
	Building 1	9,754	1,119	10,873
	Building 2	8,539	1,084	9,623
	Building 3	10,997	1,450	12,447
	Building 4	9,678	1,327	11,005
	Buildings 5 & 6	21,690	2,436	24,126
	Building 7	11,764	1,565	13,329
	Building 8	12,572	1,374	13,946
	Building 9	10,988	1,444	12,432
	Building 10	8,431	1,183	9,614
	Building 11	9,788	1,099	10,887
<b>Subterranean Parking Garage</b>		223,337 square feet in size, with 2 subterranean levels and 490 spaces		
<b>Surface Parking Area</b>		84 angled spaces along Civic Center Drive (reconstructed from existing)		
<b>Terraces</b>		13,615 square feet		
<b>Landscaping</b>		26,573 square feet		
<b>Hardscaping</b>		26,821 square feet		
<b>Building Heights</b>		3 stories (52 feet) to 4 stories (60 feet) <sup>3</sup>		

**Notes:**

- <sup>1</sup> Building numbers in this table correspond to the numbers shown in Figure 2-1.  
<sup>2</sup> The floor area ratio excluding the City right-of-way is 1.24 to 1.0.  
<sup>3</sup> The conceptual plans indicate building heights less than the maximum building heights identified in the Specific Plan.

The proposed office buildings would be dispersed across the Project Site, separated by landscaping and hardscaped areas. Landscaping and hardscaping would be installed in between the proposed buildings, along the building frontages, and at either end of the Project Site. Figure 2-2 shows the conceptual site plans for the Project.

Buildings located on each end of the Project Site (Buildings 1, 2, 10, and 11) would serve as gateways to the Project Site and would be lower in height relative to the rest of the buildings. The conceptual plans submitted as part of the Project applicant identify these “gateway” buildings as 3 stories in height (45 feet in height, as measured to the roof surface, and 50 feet in height, as measured to the top of the mechanical screen). Buildings 1 and 11 (the two end buildings) would also incorporate step-backs on the upper levels with a roof terrace to further create lower-scale approaches into the Project Site. The remaining buildings in the interior of the Project Site would be 4 stories in height, including an enclosed partial rooftop story that could be used as office space and/or as an amenity area for office tenants. According to the conceptual plans, these interior buildings would have a maximum height of approximately 60 feet. Figure 2-3 shows representative building sections for one of the gateway buildings (Building 1) and one of the interior buildings (Building 8).

Proposed building lengths would range from approximately 85 feet to 114 feet, and the buildings would be 25 feet to 30 feet apart from each other. As shown in Table 2-1, building floor areas would range from 8,431 square feet to 12,572 square feet, with the exception of Buildings 5 and 6 (located in the center of the site), which would be connected with a pedestrian bridge on the second and third levels and would have a combined floor area of 21,690



square feet. In total, the Project would involve development of 114,202 square feet of floor area, for a floor area ratio ("FAR") of 1.07 to 1.0, which is about 60% of the maximum FAR of 2.0 to 1.0 that is generally allowed for commercial development in the City.

### **Architectural Design**

The proposed office buildings would be designed in a range of architectural styles. Buildings at each end of the site would have traditional facades with columns and cornices, while buildings situated towards the center of the site would have more modern architectural treatments, such as glass screen walls and steel frames. Terraces, trellises, and setbacks would be used throughout the site to create a varied scale along the street facades.

### **Landscaping**

Landscaping and hardscaping would be installed in between the proposed buildings, along the building frontages, and at either end of the Project Site. Two gardens at each end of the Project Site would be developed, and landscaped courtyards would be located between each building. The Project Site's Santa Monica Boulevard frontage would be generally lined with hedges planted outside of the public right-of-way. Building 5 would include rooftop terrace plantings, consisting of hedges and trees.

### **Access, Circulation, and Parking**

The Proposed Project would provide 490 parking spaces in a 2-level subterranean garage located beneath the proposed buildings. The Specific Plan identifies a parking rate of one space per 350 square feet of floor area. Therefore, the Proposed Project would provide 163 more spaces than the Code-required 327 spaces. Access to the parking garage would be provided from Civic Center Drive via driveways located on each end of the Project Site as well as one-way ingress and egress access driveways near the center of the Project Site. The westerly driveway would allow for ingress and egress (right turns only). The center driveway would provide right turn and left turn inbound access, with outbound access limited to right turns only. The easterly driveway (near Beverly Boulevard) would provide right and left turn inbound access from Civic Center Drive. In order to accommodate the Project's driveway ramp and entries, approximately 74 of the existing angled surface parking stalls along Civic Center Drive would be removed. A total of 84 angled surface parking stalls would remain along Civic Center Drive, located between the proposed parking access points. The remaining 84 surface parking stalls would be reconstructed (i.e., re-paved and re-striped) as part of the Project. Additionally, 74 valet operated publicly accessible parking spaces would be provided in the subterranean garage to fully replace the surface spaces that would be removed.

The existing bus stop at the intersection of Santa Monica Boulevard and Beverly Boulevard, adjacent to the northeast corner of the Project Site, would also be improved as part of the Project.

### **Utility Improvements**

The Proposed Project would involve utility improvements within the Project Site and along the Project Site's immediate street frontages. Such improvements would include new water and sewer lines along Civic Center Drive, as well as laterals connecting new or existing lines to the proposed office buildings. These utility improvements would involve trenching within Civic Center Drive, adjacent to the Project Site. Existing utility lines within and adjacent to the Project Site would be protected in place during construction or relocated if necessary. The EIR prepared for the Proposed Project will include description and analysis of all required utility relocations and improvements.

### **Applicant Proposed Public Benefits**

In addition to Parcel 12, the Project applicant also owns properties known as “Parcel 13” and “the Triangle,” which are near the Project Site and are outlined on Figure 2-4. Parcel 13 is an approximately 2.25-acre parcel of vacant land located northeast of the Project Site, bounded by Santa Monica Boulevard to the northwest, Doheny Drive to the northeast, Civic Center Drive to the southeast, and Beverly Boulevard to the southwest. Similar to Parcel 12, Parcel 13 was formerly a railroad ROW. Union Pacific Railroad Company transferred Parcel 13 (along with Parcel 12) to the Project applicant in 1998. The “Triangle” is an approximately 0.3-acre parcel located northeast of both the Project Site and Parcel 13, bounded by the westbound lane of Santa Monica Boulevard to the north, Doheny Drive to the northeast, and the eastbound lane of Santa Monica Boulevard to the south.

As previously discussed, the applicant is proposing to transfer ownership of Parcel 13 and the Triangle to the City for public use. The applicant is proposing that permanent uses of Parcel 13 and the Triangle would be determined by the City through a public process independent of (and after) the entitlement process for the Proposed Project. Based on the proposed scope of the Project, the EIR for the Proposed Project will not evaluate any permanent development on Parcel 13 or the Triangle, because the nature, timing, and extent of such development is highly speculative at this time. The Proposed Project as evaluated in the EIR will include transfer of ownership for Parcel 13 and the Triangle from the applicant to the City; however, ownership transfer is not expected to have a material effect on the environment. In the event that the City decides to develop Parcel 13 and/or the Triangle, such development would require separate, future evaluation under CEQA.

## 2.2 Removal Action Workplan

Environmental investigations at the Project Site have identified and defined areas of soil contamination from arsenic due to the former use of the Project Site for railroad transportation. The existing contamination would be remediated pursuant to a RAW and a soil management plan approved by DTSC and in compliance with all applicable environmental laws. Impacted soils, as determined by testing, would be removed by trained personnel and disposed at an appropriately permitted landfill in compliance with regulatory requirements that would ensure the health and safety of the occupants of surrounding properties and the community at large. It is assumed that the first 2 feet of soils would be removed from the Project Site as part of RAW implementation. The RAW implementation at Parcel 12 would occur prior to or in conjunction with construction of the Proposed Project.

A Draft RAW has been prepared and was circulated for public review and comment in September and October 2020. (At the time of this writing, the RAW is still in draft form.) The RAW also includes remediation at Parcel 13 and the Triangle. The RAW is separate from the Proposed Project and is undergoing a separate environmental review process under CEQA overseen by DTSC. If the RAW is approved, RAW implementation would proceed regardless of the Proposed Project.

## 2.3 Construction

Construction is anticipated to commence in 2022 and to be completed in 2024. The anticipated construction phases are listed below in Table 2-2. Construction staging is anticipated to occur within the Project Site. Workers would park in local private parking garages during the initial phases of Project construction and would be transported to the Project Site via a shuttle service. Details for construction working parking will be included in the

Construction Management Plan required as part of entitlement approval. Once the underground parking structure is complete, construction workers would park within the Project garage.

**Table 2-2. Construction Scenario**

Construction Phase	Start Date	Finish Date	One-Way Vehicle Trips			Equipment		
			Average Daily Workers	Average Daily Vendor Trucks	Total Haul Trucks	Type	Quantity	Usage Hours
Utility Relocation, Demolition & Site Clearing	3/3/22	4/16/22	17	13	84	Loader	1	8
						Track Hoe	1	8
						Water Truck	1	8
						Street Sweeper	1	8
						Saw Cut Machine	1	4
						Air Compressor	2	4
Shoring	4/17/22	5/30/22	33	12	400	6000 pound Forklift	1	6
						Drill Rig	2	8
						35 Ton Crane	1	6
						Water Truck	1	4
						Air Compressor	2	4
						Portable Welder	2	4
Mass Excavation	6/21/22	10/24/22	48	178	9,594	6000 pound Forklift	1	6
						Loader	2	8
						Track Hoe	2	8
						Dozer	1	8
						Backhoe	2	8
						Water Truck	1	8
						Street Sweeper	1	8
						Portable Welder	1	4
						Air Compressor	2	4
Parking Garage Construction - Footing Spoils	8/27/22	10/17/22	6	15	439	Backhoe	2	8
						Track Hoe	1	8

Table 2-2. Construction Scenario

Construction Phase	Start Date	Finish Date	One-Way Vehicle Trips			Equipment		
			Average Daily Workers	Average Daily Vendor Trucks	Total Haul Trucks	Type	Quantity	Usage Hours
Parking Garage Construction - Structural Concrete	8/27/22	11/15/23	180	63	2,549	6000 pound Forklift	2	6
						Skip Loader	2	8
						Backhoe	2	8
						Street Sweeper	1	8
						Portable Welder	2	4
						Air Compressor	2	4
						Concrete Boom Pump	2	6
						Concrete Trailer Pump	2	6
Building Construction Structural Concrete	1/14/23	7/30/23	104	54	854	Concrete Trailer Pump	2	6
						Concrete Boom Pump	2	6
						Crane	2	4
						Forklift	4	6
						Boom Lift	6	8
						Air Compressor	2	4
Building Construction - Rough-in (installation of mechanical, electrical, and plumbing lines; light gauge framing; drywall; roofing; facades)	4/13/23	4/6/24	160	52	520	Crane	1	4
						Forklifts	2	6
						Scissor Lifts	12	8
						Air Compressor	2	4
						Portable Welder	2	4
						Cement & Mortar Mixer (Electric)	2	8

Table 2-2. Construction Scenario

Construction Phase	Start Date	Finish Date	One-Way Vehicle Trips			Equipment		
			Average Daily Workers	Average Daily Vendor Trucks	Total Haul Trucks	Type	Quantity	Usage Hours
Building Construction - Finishes (includes paving, architectural coatings)	10/28/23	7/28/24	74	52	360	Forklifts	2	6
						Scissor Lifts (Electric)	12	8
						Cement & Mortar Mixer (Electric)	2	8
						Concrete Industrial Saws (Electric)	4	6

Temporary fencing would be installed around the entire perimeter of the Project Site for safety and security purposes. Along the edges of shored excavation areas, K-rails would be placed for safety of vehicle traffic along both Santa Monica Boulevard and Civic Center Drive. Two-way vehicular traffic flow would be maintained along Civic Center Drive, and curb parking would continue to be allowed in designated areas. Construction truck traffic is anticipated to access the Project Site via I-405 and Santa Monica Boulevard. The Project Site would be accessed via Civic Center Drive, with trucks entering Civic Center Drive from either end of the Project Site. Trucks that are exiting the Project Site would drive onto Civic Center Drive and would then proceed northeast to Beverly Boulevard, turning left then right (or left) onto Santa Monica Boulevard. Excavated soils are not anticipated to be reused on site; as such, all excavated soils would be hauled off site. Trucks with demolition debris and soils are expected to bring materials to the Calabasas Landfill, located 27.5 miles northeast of the Project Site. If soils are found to contain hazardous materials, they would be brought to a landfill that is approved to handle such materials. Further details on each construction phase are provided below:

**Utility Relocation.** Utility relocation for utilities within the public right of way would be required as part of the Proposed Project. The EIR will include a detailed discussion and evaluation of all required relocations.

**Demolition and Site Clearing.** During this phase, the existing asphalt paving, curbs, and gutters would be demolished, and vegetation would be removed from the Project Site. Demolition debris would total approximately 837 cubic yards, equating to approximately 84 truckloads. Debris are expected to be hauled to the Calabasas Landfill, as described above. The total area proposed for grading/clearing, including parts of Civic Center Drive, is expected to be 139,392 square feet.

**Mass Excavation.** Excavation would begin at the southwestern end of the Project Site, and work would extend along the Project Site to the northeast end. The Project Site would be excavated to a depth of approximately 25 feet. Total soil export is expected to be 124,764 cubic yards, which is estimated to equate to 9,594 truckloads. (To ensure conservative and complete analysis, these excavation quantities include the amount of excavation and export that would be required for implementation of the RAW, even though remediation work is part of a separate project). Two temporary entry/exit ramps would be established for trucks (one at each end of the Project Site). Trucks would exit the Project Site onto Civic Center Drive, proceed northeast to Beverly Boulevard, and then turn left onto Santa

Monica. Debris are expected to be hauled to the Calabasas Landfill, as described above. As excavation passes the center of the Project Site, some of the equipment would be reduced. The mass excavation phase would have some overlap with the parking garage construction phases, as shown in Table 2-2.

**Parking Garage Construction.** Parking garage construction would be completed by two construction crews, working from each end of the Project Site. Structural excavation for the footings would entail soil export totaling 4,390 cubic yards, which is estimated to equate to 439 truckloads. Debris are expected to be hauled to the Calabasas Landfill, as described above. Concrete pumping for the parking garage would be staged from Civic Center Drive.

**Building Construction.** Building construction would be completed by two construction crews, working from each end of the Project Site. As such, two buildings would be constructed at the same time. (Crews would begin with Buildings 1 and 11 and then work towards the center, concluding with the construction of Buildings 5 and 6.) During the course of building construction, it is anticipated that the equipment would generally be spread evenly across the Project Site, with material and equipment staging located within the Project Site. Construction delivery trucks would generally park along Civic Center Drive during off-loading. Architectural coatings applied to the buildings would comply with CalGreen standards, which would minimize off-gassing from the coatings. Paving activities would be limited to minor patching along the edges of the new buildings.

## 2.4 Operation

The Project is expected to be operational in the fourth quarter of 2024. Individuals or companies would be able to lease or own individual buildings. Buildings are expected to be open for use 24 hours a day, 7 days per week. However, operational activities at the Project Site are expected to be concentrated around typical business hours (approximately 7:00 a.m. to 6:00 p.m.). Operational activities would be typical of office buildings and would consist primarily of employees arriving at the Project Site and leaving the Project Site; janitorial activities such as landscaping maintenance, office cleaning, and building maintenance; food service and deliveries associated with office lunchrooms or cafeterias; and deliveries to the Project Site associated with standard office building operations. Based on the square footage of office area that would be developed, the Project Site is expected to support approximately 360 employees (SCAG 2001).

Project operation would not include any stationary sources of air emissions (e.g., emergency generators, boilers, etc.). No outdoor noise sources, such as trash compactors, outdoor performance areas, or outdoor amplified music, would be included in the Project.

A full time at-grade loading area would be provided near the center of the Project Site, along Civic Center Drive. This loading zone would be provided in a recessed parallel parking bay, allowing for loading and unloading out of the flow of traffic. Two other part time at-grade loading zones would be provided in the public right-of-way at each end of the Project Site's frontage along Civic Center Drive. In each case, two angled parking spaces located in the City ROW would be signed as "Loading Only - 7 AM to 9 AM" so that these spaces would be reserved for loading during the morning hours.

## 2.5 Sustainability Practices and Features

The Proposed Project would be designed to meet or exceed LEED Gold Version 4 standards, or equivalent green building standards, which would minimize the Project's energy and water demands. The Project would also be designed to comply with the California Green Building Standards Code, as amended and adopted by the City. The Project would provide 48 bicycle parking spaces within the subterranean parking garage, which would encourage employees to use bicycles for transportation.

## 2.6 Specific Plan

The Proposed Beverly Hills Creative Offices Specific Plan has been developed to provide the regulatory framework for the proposed creative offices development at the Project Site, which is currently zoned and designated for transportation-related land uses. State law (Government Code Section 65450) gives cities the authority to adopt specific plans for implementing certain design standards and goals in designated areas. Specific plans are generally intended to provide greater details regarding the types of uses permitted on a site and development standards that would apply to projects proposed for development on the site, such as requirements for setbacks, building height, landscaping, and architectural styles. The Specific Plan would apply only to the Project Site and would provide site-specific development standards that are consistent with the standards used in the design of the Proposed Project. As such, the development of the Proposed Project would be the scope of the Specific Plan buildout scenario.

The EIR for the Proposed Project will analyze the environmental effects that may result from buildout of the Specific Plan. As such, upon approval of the Project, development on the Project Site in accordance with the Specific Plan would not require further CEQA review.

Once the Specific Plan is approved, any alterations to the plan could require further review under CEQA, depending on the scope of the alterations. As set forth in the Specific Plan, alterations to the plan would be processed under a formal amendment or an administrative modification. A Specific Plan amendment would be required for any proposed modifications that would substantially alter the distribution, location, extent, or density of the uses and buildings permitted by the Specific Plan or an increase in the maximum height of the buildings. An amendment would require discretionary approval and further review under CEQA. An administrative modification would be required for any proposed changes that do not substantially alter the distribution, location, extent, or density of the uses and buildings permitted in the Specific Plan area. An administrative modification would also be required for changes to the site plan and building elevations that would alter the approved architectural style or modulation of the buildings. An administrative modification could be approved by the Director of Community Development. Such modifications may not require further review under CEQA or may be considered exempt from CEQA. However, modifications would be evaluated on a case-by-case basis to determine whether CEQA analysis is warranted.

## 2.7 Required Permits and Approvals

### City Permits and Approvals

The Project would require discretionary approval from the City. A list of permits and approvals from the City that are required to complete the Proposed Project include, but are not necessarily limited to the following:

- **General Plan Amendment.** The Project Site currently has a Railroad land use designation that allows for quasi-public railroad-related uses and surface parking. Project implementation would therefore require an amendment to the General Plan Land Use Map to create a new Creative Offices Specific Plan land use designation.
- **Specific Plan Approval.** The proposed Specific Plan would include Project-specific development standards, including the proposed height, density, parking standards, and other development standards. The Specific Plan would permit a maximum height of 60 feet and a maximum FAR of 1.07:1.<sup>4</sup>

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<sup>4</sup> The FAR calculation of 1.07:1 is based on the total Project Site area, inclusive of the City right-of-way proposed to be vacated and added to the Project Site.

- **Zoning Map and Zone Text Amendment.** The Project Site is currently zoned T-1. Project implementation would require the Creative Offices Specific Plan to be added to the Zoning Code. The City's Zoning Map would also be amended in order to apply the Specific Plan designation to the Project Site.
- **Amendment to Master Street Plan.** The applicant proposes an amendment to the City's Master Street Plan to modify the ROW width for Civic Center Drive adjacent to the Project Site.
- **Vesting Tentative Tract Map.** The applicant is proposing to subdivide the Project Site into one master ground lot and 11 airspace lots (one for each building lot). As part of the subdivision request, the applicant is also requesting to vacate and incorporate portions of ROW above and below grade in order to accommodate the Project's subterranean parking level, new driveway entries, hardscape and landscape improvements, and a loading zone which is needed due to the Project Site's narrow width. The proposed lot area after existing surface areas of ROW are incorporated is 107,714 square feet (2.47 acres). The applicant is also requesting to formally merge an easement for street purposes that bisects the Project Site, and which previously terminated under the terms of the easement.
- **Development Agreement.** A Development Agreement is also being proposed in conjunction with the Project. As a public benefit, the applicant would convey fee title of land for Parcel 13 and the Triangle to the City for future public use. Prior to any transfer taking effect the City would have to formally accept the property.

### Approvals and Review from Other Agencies

Permits and approvals from other agencies, and/or coordination with other agencies, may also be required in association with the Proposed Project. Permits and approvals from other agencies are anticipated to be administrative in nature. As such, no responsible agencies have been identified for this project. Other agencies that may have involvement for permits, approvals, and/or coordination are listed as follows:

- California Department of Toxic Substances Control (DTSC) – Approval of a Soil Management Plan
- State Water Resources Control Board – Applicant must submit a Notice of Intent to comply with the General Construction Activity National Pollutant Discharge Elimination System (NPDES) Permit
- Utility providers – Utility connection permits

### Related Environmental Review and Consultation Requirements

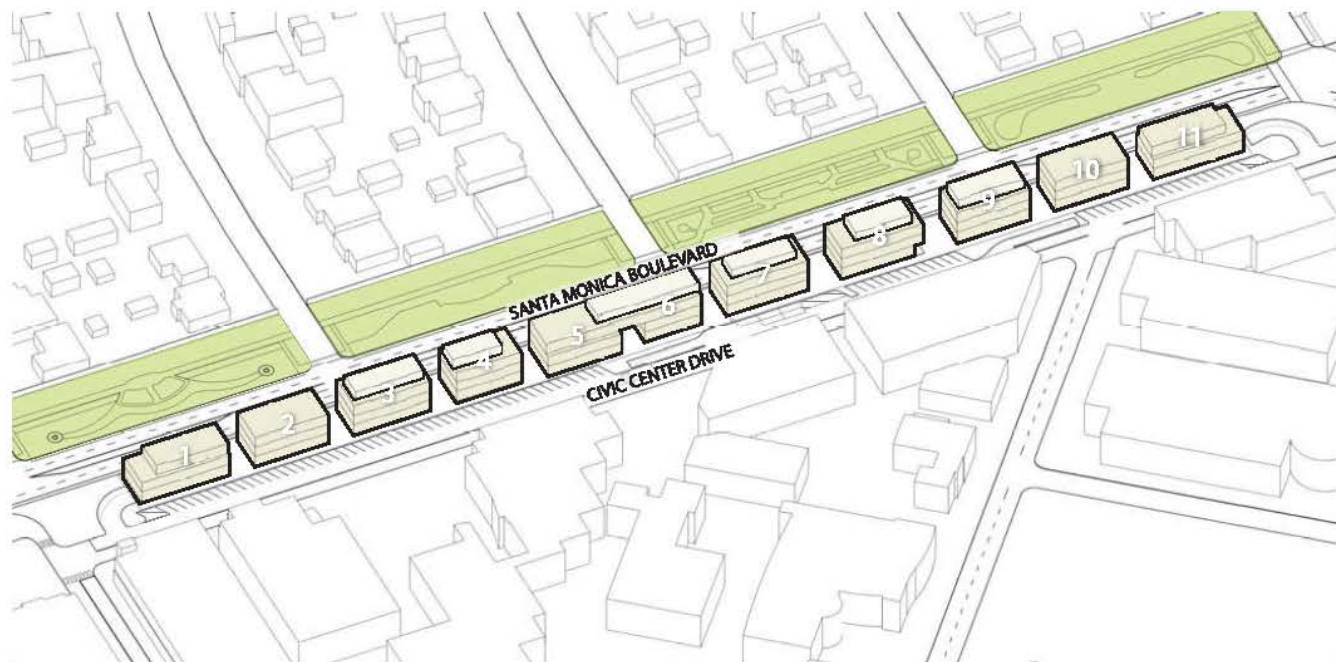
Related environmental review and consultation requirements for the Proposed Project include the following:

- Assembly Bill 52 Tribal Consultation
- Senate Bill 18 Tribal Consultation

## 2.8 References

SCAG (Southern California Associated of Governments). 2001. *Employment Density Study Summary Report*. Prepared by Natelson Company in association with Terry A. Hayes Associates. October 31, 2001. Accessed September 16, 2020. <http://www.mwcog.org/uploads/committee-documents/bl5aX1pa20091008155406.pdf>.





<b>BELOW GRADE AREA &amp; PARKING NUMBERS</b>	
BELOW GRADE PARKING AREA (NON PAID)	223,887
TOTAL PARKING STALLS REQUIRED	377
TOTAL PARKING STALLS PROVIDED	490

<b>ABOVE GRADE AREA</b>	
PROPOSED FLOOR AREA	111,202
SITE AREA (PREMERGER)	91,037
F.A.R. (PREMERGER)	1.34
SITE AREA (POST MERGER)	107,217
F.A.R. (POST MERGER)	1.07

NOTE: AREA CALCULATION DOES NOT INCLUDE PERIMETER WALLS, ELEV SHAFTS, STAIR SHAFTS, MECH. ROOMS.

<b>BUILDING 1</b>	
FIRST FLOOR AREA	3,749
SECOND FLOOR AREA	3,709
THIRD FLOOR AREA	2,208
FOURTH FLOOR AREA	-
TOTAL BUILDING 1 FLOOR AREA	9,754

<b>BUILDING 2</b>	
FIRST FLOOR AREA	3,071
SECOND FLOOR AREA	2,996
THIRD FLOOR AREA	2,531
FOURTH FLOOR AREA	-
TOTAL BUILDING 2 FLOOR AREA	8,599

<b>BUILDING 3</b>	
FIRST FLOOR AREA	2,636
SECOND FLOOR AREA	3,380
THIRD FLOOR AREA	3,353
FOURTH FLOOR AREA	1,625
TOTAL BUILDING 3 FLOOR AREA	10,997

<b>BUILDING 4</b>	
FIRST FLOOR AREA	2,876
SECOND FLOOR AREA	2,946
THIRD FLOOR AREA	2,822
FOURTH FLOOR AREA	1,159
TOTAL BUILDING 4 FLOOR AREA	9,699

<b>BUILDING 5-BUILDING 6</b>	
FIRST FLOOR AREA	6,085
SECOND FLOOR AREA	6,084
THIRD FLOOR AREA	6,405
FOURTH FLOOR AREA	3,117
TOTAL BUILDING 5+6 FLOOR AREA	21,690

<b>BUILDING 7</b>	
FIRST FLOOR AREA	3,462
SECOND FLOOR AREA	3,481
THIRD FLOOR AREA	3,408
FOURTH FLOOR AREA	1,413
TOTAL BUILDING 7 FLOOR AREA	11,764

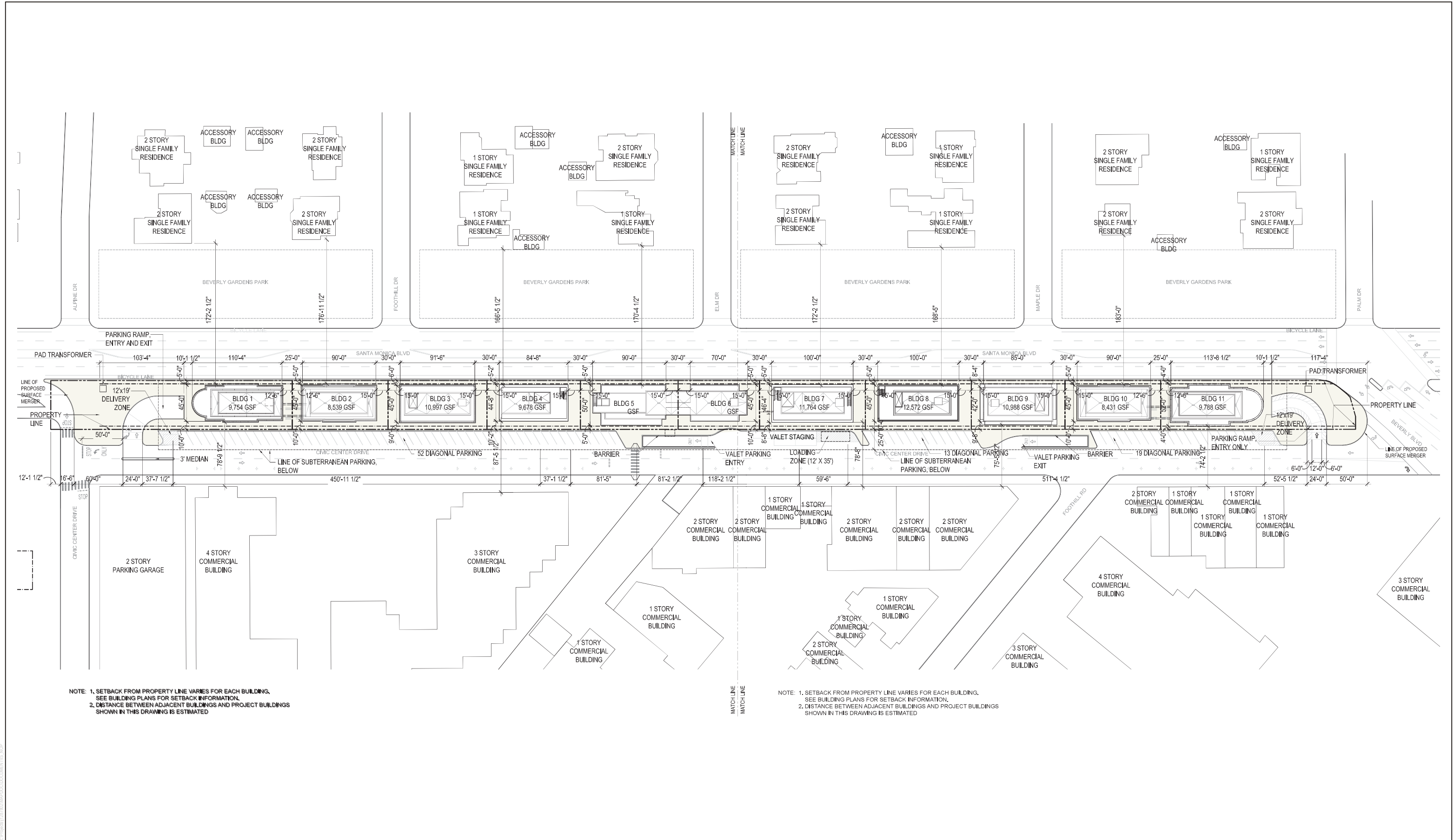
<b>BUILDING 8</b>	
FIRST FLOOR AREA	3,383
SECOND FLOOR AREA	3,861
THIRD FLOOR AREA	3,803
FOURTH FLOOR AREA	1,525
TOTAL BUILDING 8 FLOOR AREA	12,572

<b>BUILDING 9</b>	
FIRST FLOOR AREA	3,145
SECOND FLOOR AREA	3,158
THIRD FLOOR AREA	3,134
FOURTH FLOOR AREA	1,590
TOTAL BUILDING 9 FLOOR AREA	10,988

<b>BUILDING 10</b>	
FIRST FLOOR AREA	2,978
SECOND FLOOR AREA	2,960
THIRD FLOOR AREA	2,492
FOURTH FLOOR AREA	-
TOTAL BUILDING 10 FLOOR AREA	8,431

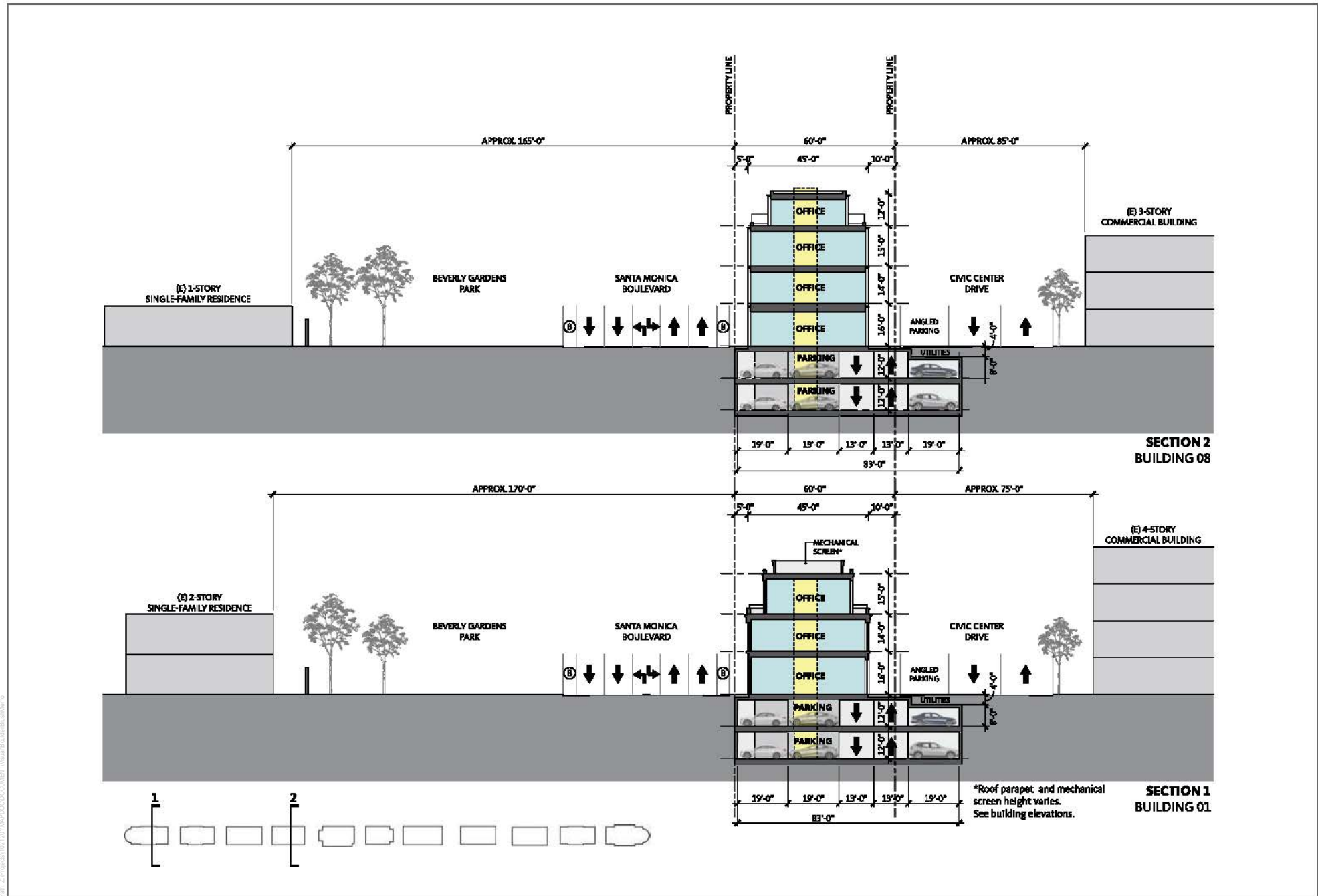
<b>BUILDING 11</b>	
FIRST FLOOR AREA	3,758
SECOND FLOOR AREA	3,734
THIRD FLOOR AREA	2,206
FOURTH FLOOR AREA	-
TOTAL BUILDING 11 FLOOR AREA	9,788

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SOURCE: Gensler 2020

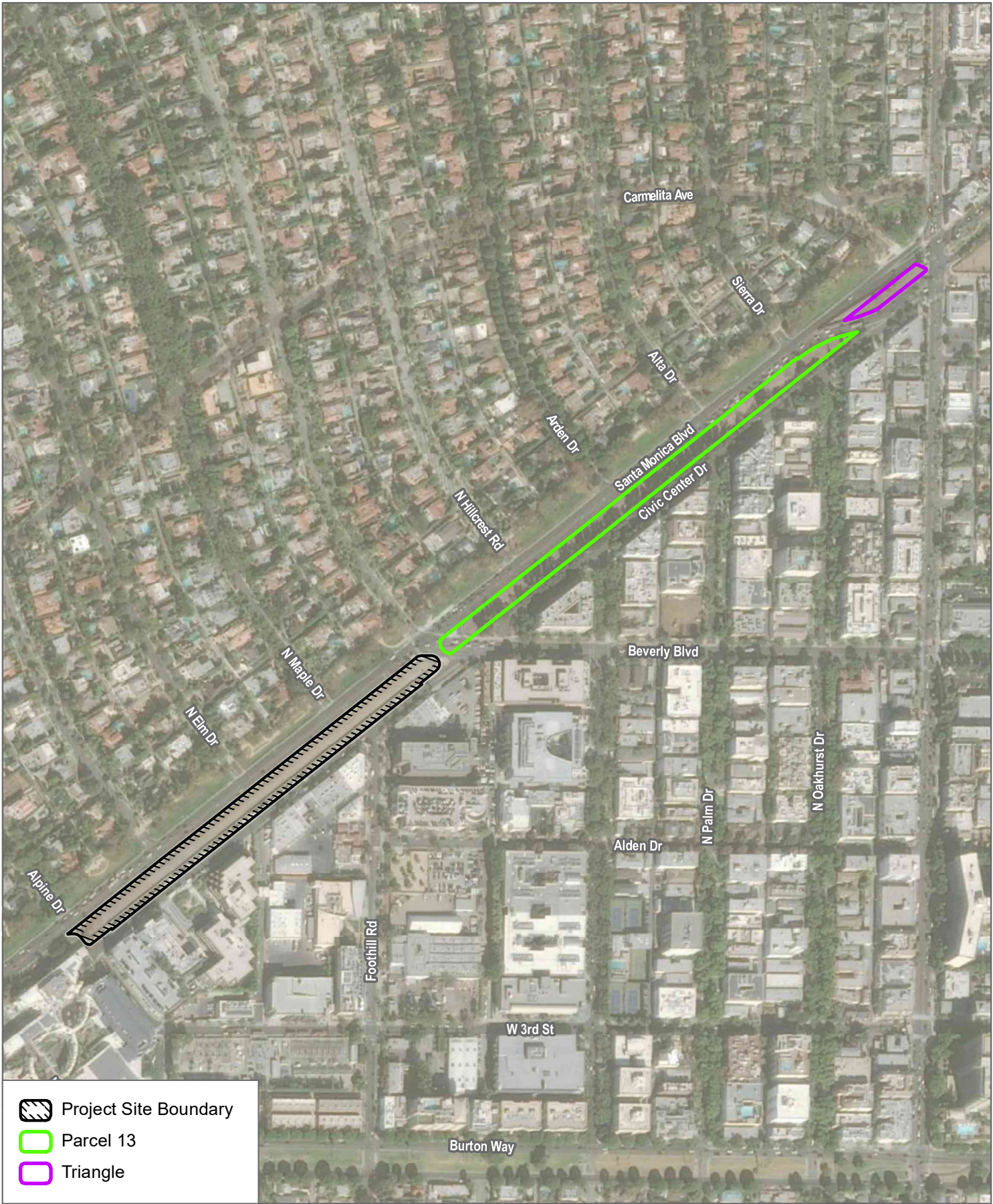
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SOURCE: Gensler 2020

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SOURCE: Bing Maps, OpenStreetMap, SCAG 2016

**FIGURE 2-4**  
**Parcel 13 and the Triangle**  
Beverly Hills Creative Offices Specific Plan Project

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# 3 Initial Study Checklist

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**1. Project title:**

Beverly Hills Creative Offices Specific Plan Project

**2. Lead agency name and address:**

City of Beverly Hills  
Planning Division, Department of Community Development  
455 North Rexford Drive  
Beverly Hills, California 90210

**3. Contact person and phone number:**

Masa Alkire, AICP, Principal Planner  
City of Beverly Hills  
Planning Division, Department of Community Development  
455 North Rexford Drive  
Beverly Hills, California 90210  
310-285-1135  
malkire@beverlyhills.org

**4. Project location:**

9220 North Santa Monica Boulevard, Beverly Hills, California 90210

**5. Project sponsor's name and address:**

Beverly Hills Land Company, LLC  
163 South Rodeo Drive  
Beverly Hills, California 90210

**6. General plan designation:**

Railroad

**7. Zoning:**

T-1 Transportation Zone

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

Refer to Chapter 2.0 of this Initial Study.

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

Refer to Section 1.4 of this Initial Study.

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

Refer to Section 2.7 of this Initial Study.

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

Refer to Section 3.18 of this Initial Study for details.

*Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.*

### Environmental Factors Potentially Affected

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

- |   |  |  |
|---|--|--|
| <input checked="" type="checkbox"/> Aesthetics                    | <input type="checkbox"/> Agriculture and Forestry Resources  | <input checked="" type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources                     | <input checked="" type="checkbox"/> Cultural Resources       | <input checked="" type="checkbox"/> Energy                             |
| <input checked="" type="checkbox"/> Geology and Soils             | <input checked="" type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials    |
| <input checked="" type="checkbox"/> Hydrology and Water Quality   | <input checked="" type="checkbox"/> Land Use and Planning    | <input type="checkbox"/> Mineral Resources                             |
| <input checked="" type="checkbox"/> Noise                         | <input type="checkbox"/> Population and Housing              | <input type="checkbox"/> Public Services                               |
| <input type="checkbox"/> Recreation                               | <input checked="" type="checkbox"/> Transportation           | <input checked="" type="checkbox"/> Tribal Cultural Resources          |
| <input checked="" type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire                            | <input checked="" type="checkbox"/> Mandatory Findings of Significance |

### Determination

On the basis of this initial evaluation:

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

*Masa Alkire*

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Signature

1/12/2021

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Date

## Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less Than Significant With Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance

### 3.1 Aesthetics

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the Project:				
a) Have a substantial adverse effect on a scenic vista?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) In non-urbanized 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, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) *Would the Project have a substantial adverse effect on a scenic vista?***

**Potentially Significant Impact.** Scenic vistas are typically considered to be views of scenic resources that are available from public vantage points. The City's General Plan sets forth several policies for the protection of scenic vistas. Policy OS 6.1 states "Seek to protect scenic views and vistas from public places including City landmarks, hillside vistas, and urban views of the City" and Policy OS 6.2 states "Seek to protect historic scenic parkways and associated greenbelts and viewpoints, such as that section of Santa Monica Boulevard (the old Route 66) that is located within the City" (City of Beverly Hills 2010). . As such, the City considers numerous features as scenic: City landmarks, hillsides, urban views of the City, and views of or from historic scenic parkways and associated greenbelts and viewpoints, such as that section of Santa Monica Boulevard located within the City. Development of the Project Site has the potential to affect views that may be available from Santa Monica Boulevard, including views of Beverly Hills City Hall. The Project would also have the potential to change the appearance of a segment of Santa Monica Boulevard. The EIR will include visual simulations of the Proposed Project from key observation points, as well as a narrative analysis of the visual simulations that will determine whether the Proposed Project has the potential to obstruct or degrade a feature of the visual environment that is considered scenic per City policy. As such, the Project's potential effects to scenic vistas requires further evaluation, and this topic will be further discussed and evaluated in the EIR.

- b) *Would the Project substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

**No Impact.** The nearest officially designated State Scenic Highway is a portion of State Highway 2 that extends through the San Gabriel Mountains, beginning just north of the City of La Cañada Flintridge (Caltrans 2020). The portion of State Highway 2 that is officially designated as a State Scenic Highway is located approximately 15 miles northeast of the Project Site. Due to this distance, the Proposed Project Site is not within the viewshed of this State Scenic Highway. Therefore, no impact on scenic resources within a State Scenic Highway would occur as a result of the Proposed Project, and this topic will not be further discussed in the EIR.

- c) *In non-urbanized areas, would the Project 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, would the Project conflict with applicable zoning and other regulations governing scenic quality?*

**Potentially Significant Impact.** The Proposed Project Site, as well as the Public Benefit component of the Project (Parcel 13 and the Triangle), are located in an urbanized area and are surrounded on all sides by existing urban development. As described in Section 3.1(a), the City's General Plan has several policies pertaining to scenic vistas. The General Plan also has policies pertaining to scenic quality, including policies that apply to new development. For example, Policy OS 6.5, Standards for New Development, states "Seek to ensure that new development does not adversely impact the City's unique urban landscape" (City of Beverly Hills 2010). Other policies require new development to be located and designed to visually complement the urban setting and to minimize removal of existing visual resources. The City's Municipal Code also sets forth policies pertaining to scenic quality, including requirements for high-quality design and visual consistency with surrounding areas (Municipal Code, Title 10, Chapter 3, Article 30 – Architectural Commission, Architectural Review, and Procedure). Further evaluation is required to establish the Project's consistency with policies for scenic quality. The EIR will present a consistency analysis between the Proposed Project and applicable regulations governing scenic quality (including the General Plan policies and Municipal Code policies discussed above). The analysis will come to a conclusion as to whether or not the Proposed Project would conflict with applicable zoning and other regulations governing scenic quality. As such, this topic will be further discussed and evaluated in the EIR.

- d) *Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

**Potentially Significant Impact.**

#### ***Light and Glare***

The windows and building materials proposed for the exterior of the Project could increase reflected sunlight during certain times of the day. Further, the Proposed Project would incorporate exterior lighting in the form of pedestrian walkway lighting, building lighting, interior lighting, safety lighting, and lighting for business signs. The Project would be required to comply with Section 5-6-1101 (Excessive Lighting Prohibited) of the City's Municipal Code, which prohibits the installation, use, and maintenance of lighting that creates an intensity of light on residential property greater than one foot-candle above ambient light level. Nevertheless, the Project would represent an increase in light and glare levels on the Project Site

compared to existing site conditions. The EIR will describe the light and glare increases that may be associated with the Proposed Project and will compare the increases to existing conditions, thereby establishing whether the Project would adversely affect day or nighttime views in the area relative to existing conditions. As such, this topic will be further discussed and evaluated in the EIR.

### ***Shade and Shadow***

The City of Beverly Hills has consistently used the following standard as the threshold for assessing project-related shade and shadow impacts.

A project may have a significant impact if shadow-sensitive uses would be shaded by project-related structures for more than:

- Three hours between the hours of 9:00 a.m. and 3:00 p.m. Pacific Standard Time between late October and early April
- Four hours between the hours of 9:00 a.m. and 5:00 p.m. Pacific Daylight Time between early April and late October.

Shadow-sensitive uses are generally facilities and operations sensitive to the effects of shading include solar collectors; nurseries; primarily outdoor-oriented retail uses (e.g., certain restaurants); or routinely useable outdoor spaces associated with recreational, institutional (e.g., schools), or residential land uses. These uses are considered sensitive because sunlight is important to their function, physical comfort, commerce, or combination thereof. Shadow-sensitive uses near the Project Site include Beverly Gardens Park, which is located the northwest of the Project Site (across Santa Monica Boulevard), and residential uses that are to the north of Beverly Gardens Park. Detailed shade/shadow studies will be included in the EIR and will be analyzed relative to the threshold described above. As such, this topic will be further discussed and evaluated in the EIR.

### **References**

- Caltrans (California Department of Transportation). 2020. List of eligible and officially designated State Scenic Highways. Accessed September 28, 2020: <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>.
- City of Beverly Hills. 2008. General Plan Land Use Designations. May LU1. Prepared by the Community Development Department. April 29, 2008. Accessed September 28, 2020. <http://www.beverlyhills.org/departments/communitydevelopment/longrangeplanning/generalplan/generalplandocument/>.
- City of Beverly Hills. 2010. *City of Beverly Hills General Plan*. April 30, 2010. Accessed September 26, 2020. <http://www.beverlyhills.org/departments/communitydevelopment/longrangeplanning/generalplan/generalplandocument/>.



## 3.2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) ***Would the Project 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?***

**No Impact.** The Project Site, Parcel 13, and the Triangle are not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP 2020). Therefore, the Project would not convert Farmland to non-agricultural uses. No impact would occur, and this issue will not be further analyzed in the EIR.

**b) *Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?***

**No Impact.** The Project Site, as well as the Public Benefit component of the Project (Parcel 13 and the Triangle), are zoned for transportation uses. As shown on the Los Angeles County Williamson Act Fiscal Year 2015/2016 map, no areas that are under a Williamson Act contract exist on the Project Site or in the vicinity of the Project Site (California Department of Conservation 2016). For these reasons, implementation of the Proposed Project would not conflict with existing zoning for agricultural use, as none exist in the area, nor would it conflict with a Williamson Act contract, as none exist in the area. No impact would occur, and this issue will not be further analyzed in the EIR.

**c) *Would the Project 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))?***

**No Impact.** The Project Site, as well as the Public Benefit component of the Project (Parcel 13 and the Triangle), are zoned and designated for transportation-related uses. No forest land, timberland, or Timberland Production areas are located within or adjacent to the Project Site. Therefore, the Proposed Project would not conflict with existing zoning for forest land, timberland, or Timberland Production areas, or result in the loss or conversion of forest lands to non-forest uses, as none exist. The Project would be implemented on a site that is surrounded by fully developed areas on all sides. No impact would occur, and this issue will not be further analyzed in the EIR.

**d) *Would the Project result in the loss of forest land or conversion of forest land to non-forest use?***

**No Impact.** As characterized above, no forest land is located within the Project Site or in the vicinity of the Project Site, as the Project area is urbanized and developed with commercial and residential uses. No forest land would be converted or otherwise affected by the Proposed Project. No impact would occur, and this issue will not be further analyzed in the EIR.

**e) *Would the Project 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?***

**No Impact.** As characterized above, no farmland or forest land is located in the Project Site or within the vicinity of the Project Site. As such, no farmland or forest land would be converted or otherwise affected by the Proposed Project. No impact would occur, and this issue will not be further analyzed in the EIR.

## References

California Department of Conservation. 2016. *Los Angeles County Williamson Act FY 2015/2016*. [map]. 1:120,000. Sacramento, CA: California Department of Conservation, Division of Land Resource Protection. 2016. Accessed June 20, 2019. [http://www.conservation.ca.gov/dlrp/wa/Pages/stats\\_reports.aspx](http://www.conservation.ca.gov/dlrp/wa/Pages/stats_reports.aspx).

FMMP (Farmland Mapping and Monitoring Program). 2020. California Important Farmland Finder. Web mapping tool. Accessed September 23, 2020. <http://www.conservation.ca.gov/dlrp/fmmp/Pages/LosAngeles.aspx>.

### 3.3 Air Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) Would the Project conflict with or obstruct implementation of the applicable air quality plan?**

**Potentially Significant Impact.** A significant impact may occur if the Project is not consistent with the applicable air quality plan or would interfere with implementation of the policies of that plan. The Project Site is within the South Coast Air Basin, and the applicable plan is the Air Quality Management Plan prepared by the South Coast Air Quality Management District (SCAQMD). Construction and operation of the Project could result in an increase in emissions by increasing the land use intensity at the Project Site, having the potential to conflict with the Air Quality Management Plan. Further analysis of this issue will be provided in the EIR.

**b) Would the Project 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?**

**Potentially Significant Impact.** Construction emissions associated with development of the Proposed Project would temporarily emit pollutants to the local airshed from dust and on-site equipment, construction worker vehicles, delivery trucks, and off-site haul trucks. Volatile organic compounds (VOCs), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), particulate matter with an aerodynamic diameter equal to or less than 10 microns (PM<sub>10</sub>), particulate matter with an aerodynamic diameter equal to or less than 2.5 microns (PM<sub>2.5</sub>), and sulfur oxides (SO<sub>x</sub>) emissions are the main pollutants that would result from construction. Project operation would also emit pollutants associated with vehicular traffic, area sources (consumer products, architectural coatings, landscaping equipment), and energy sources (natural gas, appliances, and space and water heating).

Criteria pollutants under nonattainment in the South Coast Air Basin are ozone and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) (SCAQMD 2017). The Proposed Project would generate VOC and NO<sub>x</sub> emissions (which are precursors to ozone) and emissions of PM<sub>10</sub> and PM<sub>2.5</sub>. Further analysis is required to determine the

Proposed Project's potential to result in a cumulatively considerable net increase of these criteria pollutants. Therefore, this issue will be further analyzed in the EIR.

**c) *Would the Project expose sensitive receptors to substantial pollutant concentrations?***

**Potentially Significant Impact.** There are sensitive receptors (residences) located within approximately 140 feet of the Project Site. The Proposed Project may generate toxic air contaminant emissions during construction of the Project. Additionally, the operational emissions associated with the Project could expose sensitive receptors to pollutant concentrations as well. Further analysis is required regarding the air pollutant emissions that would result from the Proposed Project, and whether a substantial impact to sensitive receptors would result. Therefore, this issue will be further analyzed in the EIR.

**d) *Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?***

**Less Than Significant Impact.** The occurrence and severity of potential odor impacts depends on numerous factors. The nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of receiving location each contribute to the intensity of the impact. Although offensive odors seldom cause physical harm, they can be annoying, cause distress among the public, and generate citizen complaints.

During Project construction, exhaust from equipment may produce discernible odors typical of most construction sites. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from tailpipes of construction equipment. However, such odors would disperse rapidly from the Project Site and would generally occur at magnitudes that would not affect substantial numbers of people. Land uses and industrial operations associated with operational odor complaints include agricultural uses, wastewater treatment plants, food-processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding (SCAQMD 1993). Operation of the Proposed Project would not entail any of these potentially odor-causing land uses. Furthermore, during construction and operation of the Proposed Project, the applicant, construction contractor, and Project operators would be required to comply with SCAQMD Rules 401, 402, and 403. Rule 401 prohibits discharge of air contaminants that are dark in shade or that obscure an observer's view for more than three minutes over the course of an hour. Rule 402 prohibits discharge of air contaminants that cause injury, detriment, nuisance, or annoyance to a considerable number of people or to the public, or that endanger the comfort, repose, health, or safety of people or the public, or that cause or have a natural tendency to cause injury or damage to business or property. Rule 403 requires implementation of dust control measures during activities capable of generating fugitive dust. Due to the nature of Proposed Project construction and operation, and upon compliance with applicable SCAQMD rules, the Proposed Project would not create any new sources of odor during construction or operation. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

**References**

SCAQMD (South Coast Air Quality Management District). 1993. CEQA Air Quality Handbook.

SCAQMD (South Coast Air Quality Management District). 2017. *Final 2016 Air Quality Management Plan*. March 2017. Accessed June 10, 2019. <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>.

### 3.4 Biological Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the Project 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?*

**Less Than Significant.** The City does not generally support native wildlife due to its urban character (City of Beverly Hills 2010). While the hillsides and canyons of the City may support wildlife such as hawks, falcons, birds, coyotes, opossums, and raccoons (City of Beverly Hills 2010), the Project Site, as well as the Public Benefit component of the Project (Parcel 13 and the Triangle), are situated along Santa Monica Boulevard

and are in a developed area characterized by vehicle traffic, urban noise, and activity. The Proposed Project would involve ground disturbance and development on the Project Site. Parcels 12 and 13 are currently vacant; however, they were used for railroad purposes from the 1920s through the 1970s. Under existing conditions, the Project Site is surrounded by small hedge plants consisting of *Abelia* and *Ficus nitida* columns, and the interior of the Project Site primarily consists of soil and ruderal vegetation. There are no trees on the Project Site (Ashley Consulting Arborists 2019), with the exception of one fan palm that is located at the southwestern end of the Project Site, within an area that is currently part of the public ROW. Parcel 13 is lined with mature trees and shrubs that are nonnative and ornamental in nature. Parcel 13 also supports seasonal, nonnative grasses.

Literature and database searches were conducted for the Project Site, Parcel 13, the Triangle, and the Project vicinity. Research included a search of the California Natural Diversity Database (CNDDDB), which is maintained and compiled by the California Department of Fish and Wildlife (CDFW), and the U.S. Fish and Wildlife Service (USFWS) species occurrence database and designated critical habitat areas. These searches were conducted to determine whether special-status species have been documented to occur within the Project area. Database searches identified 43 special-status plant species and 57 special-status wildlife species with recorded occurrences in the U.S. Geologic Survey's *Beverly Hills, California* 7.5-minute topographic quadrangle, in which the Project Site, Parcel 13, the Triangle are located, and the surrounding seven quadrangles. Of these species, 29 are listed under the federal and/or California endangered species acts and one is a candidate under the California Endangered Species Act. The Project Site is not located within any designated critical habitat (CDFW 2020, USFWS 2020a).

While some special-status species are known to occur in the Project area and surrounding region, the Project Site, Parcel 13, and the Triangle are located within a highly urbanized area and contain sparse ornamental landscaping. Desktop research of the Project area included a review of the latest aerial and street view imagery. Based on this imagery, as well as biological expertise in the Project vicinity, no native habitat is located on or adjacent to the Project Site, or Parcel 13 and the Triangle. As such, no special-status species, including listed species, are expected to occur on the Project Site, or Parcel 13 and the Triangle, due to the absence of suitable habitat.

However, the ornamental vegetation within and adjacent to the Project Site could provide nesting habitat for common birds and raptors protected under the Migratory Bird Treaty Act (16 USC §§703–712) and California Fish and Game Code Sections 3503, 3503.5, and 3513. Vegetation removal and other construction activities that are proposed on the Project Site could negatively affect individual birds or raptors that are nesting on or within the vicinity of the Project Site. Vegetation removal could adversely affect or kill a nesting bird or raptor, and construction activities would also elevate noise levels and could cause disturbance to protected bird or raptor species nesting on site or adjacent to construction disturbance areas. Construction could potentially occur during breeding, reproduction, and juvenile rearing periods for nesting birds and raptors (February 1 through August 31, and as early as January 1 for some raptors). Thus, there is potential for construction activities and construction noise to negatively affect breeding or reproduction of bird and/or raptor species on or adjacent to the Project Site. However, to ensure project compliance with regulatory requirements the following conditions of approval would be required to ensure compliance with the Migratory Bird Treaty Act and protection of nesting birds:

- The Project applicant/contractor would conduct all construction, ground disturbance, and vegetation clearing activities (collectively referred to as “construction activities”) outside of the avian breeding and nesting season (February 1–August 31) to the extent feasible.

- If, however, construction activities must occur during the avian breeding and nesting season, a pre-construction survey shall be conducted by a qualified biologist for active bird nests (those containing eggs or nestlings, or with juvenile birds still dependent on the nest). The survey shall be conducted by a qualified biologist no more than seven days prior to the initiation of construction activities. The nesting bird survey shall cover the construction footprint plus a buffer of 100 feet, as feasible.<sup>5</sup> In the event access to private, off-site areas is denied, areas can be surveyed from the project site with binoculars or other means.
- Any active nests that are present during the pre-construction survey shall be avoided until determined by the biologist to no longer be active. The biologist shall determine appropriate avoidance buffers for each nest based on species, nest location, and types of disturbance proposed in the vicinity of the nest.
- If construction activities are delayed after the survey has been conducted, the qualified biologist shall conduct an additional nesting bird survey such that no more than seven days have elapsed between the last survey and the commencement of construction activities.

The above conditions would ensure that any active nests within or adjacent to the proposed work areas are protected and are not disturbed during construction. Compliance with the regulatory standards and conditions would ensure that construction impacts to protected nesting birds and raptors are not adverse. Construction impacts would therefore be less than significant. Once the Proposed Project has been constructed, construction-related disturbances would not occur, and landscaping would be planted throughout the Project Site. As such, the Project Site would continue to provide potential nesting sites in an urban environment, consistent with existing conditions. Therefore, long-term impacts to nesting and migratory birds and raptors would not be significant. Overall, impacts would be less than significant. This issue will not be further analyzed in the EIR.

**b) *Would the Project 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 U.S. Fish and Wildlife Service?***

**No Impact.** The Project Site, as well as the Public Benefit component of the Project (Parcel 13 and the Triangle), support ornamental vegetation. Because the vegetation is ornamental in nature and is situated in an urban environment, it does not constitute a sensitive natural community in and of itself. Furthermore, no riparian areas are identified within the Project Site, Parcel 13, or the Triangle (USFWS 2020b). Thus, riparian habitats and sensitive natural communities do not exist within the Project Site, Parcel 13, or the Triangle, and no impact would occur. This issue will not be further analyzed in the EIR.

**c) *Would the Project 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 Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), do not support any wetland areas. Based on a review of the USFWS National Wetlands Inventory, the Project Site, as well as Parcel 13 and the Triangle, do not contain any blue-line streams or wetland habitats (USFWS 2020b). Due to the urbanized nature of the Project area and its surroundings, as well as the absence

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<sup>5</sup> Biological experts recommend a 100-foot buffer for this project, due to the highly urban nature of the site and its surroundings.

of any wetlands within the Project Site, as well as Parcel 13 and the Triangle, no impact would occur. This issue will not be further analyzed in the EIR.

- d) ***Would the Project 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?***

**Less Than Significant.** As described under Section 3.4(c), there are no wetlands or running waters within the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), and therefore, the Proposed Project would have no potential to affect the movement of migratory fish. Regarding wildlife movement, the Project Site, as well as Parcel 13 and the Triangle, are within an urbanized area and are not expected to function as wildlife movement corridors. While the Project Site, as well as Parcel 13 and the Triangle, are vacant and support some vegetation, they are bound on all sides by heavily trafficked roadways. As such, they are not likely to support wildlife movement through the City. Furthermore, the City is not recognized as an existing or proposed Significant Ecological Area that links migratory populations, as designated by the County of Los Angeles (County of Los Angeles 2020). However, vegetation on and adjacent to the Project Site has the potential to provide potential nesting sites for protected birds and raptors, which could be subject to Project-related construction disturbances. As discussed in Section 3.4(a), Proposed Project construction has the potential to adversely affect protected nesting birds or raptors. However, as described in Section 3.4(a), a condition of approval would be required for the Project ensuring that nesting and migratory birds and raptors are protected in accordance with applicable regulatory standards. As such, impacts would be less than significant. This issue will not be further analyzed in the EIR.

- e) ***Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

**Less Than Significant Impact.** The City has policies in place to protect biological resources, including certain trees and other vegetation. Specifically, Municipal Code Section 5-6-1001 prohibits damaging or interfering with any tree, shrub, vegetation, or planting of any character in any public parkway, park, or on any public land without authorization from the City.

The Project Site supports one ornamental tree (a fan palm), which would be removed. However, the tree is nonnative and is not a City-protected tree. There are no street trees located along the Project Site's frontages; as such, no trees would be removed or disturbed as a result of construction within the Project Site. Several trees are situated along the south side of Civic Center Drive, across from the Project Site. However, Project construction and ground disturbance would not extend to the south side of Civic Center Drive; as such, disturbances are not anticipated. However, existing vegetation within the portions of the Project Site that are currently part of the public ROW (including the fan palm) would be removed. Such vegetation removals would only be undertaken upon authorization from the City, per Municipal Code Section 5-6-1001. The Public Benefit areas, Parcel 13 and the Triangle, contain trees and vegetation; however, the trees and vegetation on these properties would not undergo disturbances as part of this Proposed Project.

As such, the Proposed Project would be undertaken in compliance with all local policies, including the City's tree protection policies. Upon required compliance with Municipal Code Section 5-6-1001, impacts would be less than significant. This issue will not be further analyzed in the EIR.



**f) *Would the Project 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 Impact.** The City's General Plan EIR does not designate any areas of the City as being within a habitat conservation plan (City of Beverly Hills 2010). Furthermore, the City is not within any of the regional conservation plans designated by the state (CDFW 2019), and the City is not recognized as an existing or proposed Significant Ecological Area by the County (County of Los Angeles 2020). Therefore, implementation of the Proposed Project would not conflict with the provisions of an adopted habitat conservation plan; natural community conservation plan; or other approved local, regional, or state habitat plan, as none apply to the Project Site. No impact would occur as a result of the Proposed Project, and this issue will not be further analyzed in the EIR.

**References**

Ashley Consulting Arborists. Affidavit – Lot 12, Civic Center Drive, Beverly Hills, CA. August 16, 2019.

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CDFW (California Department of Fish and Wildlife). 2020. List of California Natural Diversity Database (CNDDB) Species. Accessed October 27, 2020. <https://www.wildlife.ca.gov/Data/CNDDB>.

USFWS (United States Fish and Wildlife Service). 2020a. Environmental Conservation Online System Information, Planning, and Conservation System (IPaC). Accessed October 27, 2020. <https://ecos.fws.gov/ipac/>.

USFWS. 2020b. National Wetlands Inventory, *Wetlands Mapper*. Accessed September 25, 2020. <https://www.fws.gov/wetlands/Data/Mapper.html>.

### 3.5 Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) *Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?***

**Potentially Significant Impact.** Preparation of the EIR will involve conducting a cultural resources records search of the Project Site, the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), as well as a pedestrian survey. These investigations will identify the likelihood of the Project Site and the Public Benefit component of the Proposed Project (Parcel 13 and/or the Triangle) to support historical resources. The EIR will summarize the findings of these investigations and will describe whether the Project could have an adverse effect in the category of historical resources. As such, this issue will be further analyzed in the EIR.

**b) *Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?***

**Potentially Significant Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are located within an urbanized area and has been subject to disturbance in the past. Public Resources Code Section 21083.2(g) generally defines a unique archaeological resource as an artifact, object, or site that meets a number of criteria, including an ability to provide information needed to answer important scientific questions that have public interest; having a special and particular quality, such as being the oldest of its type; or, being directly associated with a scientifically recognized important prehistoric or historic event or person.

Any archaeological resources on the Project Site have likely been previously disturbed. Furthermore, the remediation process that would be conducted prior to Project implementation would include disturbance of up to 2 feet of soil below the ground surface on the Project Site and the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle). However, Project construction would involve excavation within the Project Site beyond 2 feet below the ground surface. In the event that resources are buried below a depth of 2 feet, the Proposed Project would have the potential to result in the inadvertent discovery of buried, previously unknown archaeological resources. In the event that previously unknown, buried resources were

to be encountered during construction, significant impacts could result if the resource(s) are not identified and avoided or properly treated. The EIR will therefore discuss the potential for such resources to be impacted by the Proposed Project and will identify mitigation measures to reduce impacts of the Proposed Project on any archeological resources that may be present. As such, this issue will be further analyzed in the EIR.

**c) *Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?***

**Potentially Significant Impact.** As previously discussed, the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are located within an urbanized area and has been subject to disturbance in the past. The Project Site, Parcel 13, and the Triangle are not part of a formal cemetery, and therefore, it is unlikely that human remains exist on or in the vicinity of the Project Site, as well as Parcel 13 and the Triangle. While unlikely, there is some chance that previously undiscovered human remains could be located within the Project Site and could be disturbed by construction activities. Therefore, this issue will be further analyzed in the EIR, and will be discussed in both the cultural resources section and in the tribal cultural resources section.

## References

None.

## 3.6 Energy

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) *Would the Project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?***

**Potentially Significant Impact.** As described in Section 1.4, electricity in the City is supplied by Southern California Edison, and natural gas is supplied by Southern California Gas Company. Construction of the Proposed Project would require the use of energy in the form of fossil fuels (for construction equipment, worker vehicles, and truck trips) and electricity (for construction site lighting, computer equipment, and temporary construction trailers, if needed). Operation of the Proposed Project would require electricity for building operation (appliances, lighting, etc.) and fossil fuels related to vehicular transportation to and from the Project Site. Project operation would also result in indirect energy consumption related to the supply,

distribution, and treatment of water, wastewater, and solid waste. As described in Section 2.5, the Proposed Project would incorporate a variety of sustainability design features that would support efficient energy use during operation. The Proposed Project would be designed to meet or exceed LEED Gold Version 4 standards, or equivalent green building standards, which would minimize the Project's energy and water demands. The Project would also be designed to comply with the California Green Building Standards Code, as amended and adopted by the City. The City also subscribes to the Clean Power Alliance, a service that allows electricity customers to purchase renewable power. Customers have the option to purchase 36%, 50%, or 100% of their electricity from clean power sources. The default renewable energy content provided in the City is 50%. This program would allow the Project operators to purchase electricity specifically from renewable sources, which would decrease the Project's consumption of nonrenewable energy. While the Project would comply with regulatory requirements for energy efficiency and would incorporate design features to promote efficiency, the EIR will include additional analysis on this topic. The EIR will show the anticipated energy consumption that would result from Project construction and operation. The Project's energy consumption will then be compared to existing regional demands, and sustainability measures will be discussed in further detail. This analysis will establish whether the Project's energy use is considered wasteful, inefficient, or unnecessary. As such, this issue will be further analyzed in the EIR.

**b) *Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?***

**Potentially Significant Impact.** There are a variety of state and local plans and policies in place that promote use of renewable energy and energy efficiency. Examples include the state's Renewable Portfolio Standard and the California Building Energy Efficiency Standards. The Renewable Portfolio Standard initially required retail sellers of electric services to increase procurement from eligible renewable energy resources to 20% of total retail sales by 2017. In 2015, Senate Bill 350 mandated a 50% Renewable Portfolio Standard by 2030. In 2018, Senate Bill 100 increased the Renewable Portfolio Standard to 60% by 2030 and requires all of the state's electricity to come from carbon-free resources by 2045. In accordance with Senate Bill 100, the City's electricity supplier (Southern California Edison) is required to procure at least 60% of its energy portfolio from renewable sources by 2030.

The California Building Energy Efficiency Standards (California Code of Regulations, Title 24, Part 6) was adopted to ensure that building construction, system design, and installation achieve energy efficiency and preserve outdoor and indoor environmental quality.

The Proposed Project has been designed and would be constructed to incorporate sustainable building features and construction protocols required by state and local regulations and plans, including the Beverly Hills Green Building Code, CALGreen, and the Sustainable City Plan. The Proposed Project is required to be consistent with existing regulations and, therefore, is not anticipated to conflict with renewable energy or energy efficiency plans. However, the EIR will include a more robust discussion of applicable plans and policies and will provide a consistency analysis for the Proposed Project, to ensure that the Project would comply with such plans policies. Therefore, this issue will be further analyzed in the EIR.

**References**

None.

### 3.7 Geology and Soils

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) ***Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:***

i) ***Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.***

**Potentially Significant Impact.** The Alquist-Priolo Earthquake Fault Zoning Act, California Public Resources Code sections 2621 et seq., regulates development near active faults to reduce hazards associated with surface fault rupture. The Act prohibits most structures for human occupancy from being built across the trace of active faults and establishes special study zones called Alquist-Priolo Zones, which extend 500 feet from the fault. These zones are delineated and defined by the state geologist and identify areas where potential surface rupture along a fault could prove hazardous. The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are not mapped within an Alquist-Priolo Earthquake Fault Zone, indicating that earthquake faults are not known to cross these properties (CGS 2020). However, the boundary of the nearest Alquist-Priolo Earthquake Fault Zone is located approximately 700 feet south of the Project Site. Construction and operation of the Project would not increase or exacerbate the potential for fault rupture to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving fault rupture. Nevertheless, due to the proximity of the Project Site to an Alquist-Priolo Earthquake Fault Zone, this issue will be further discussed in the EIR. Specifically, data gathering for the EIR will include a geotechnical investigation and associated report(s) that will further evaluate and discuss the potential for fault rupture at the Project Site. The EIR analysis will then incorporate and summarize the findings of the geotechnical investigation and will come to a conclusion regarding fault rupture hazards.

ii) ***Strong seismic ground shaking?***

**Potentially Significant Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are located within an area that could be subject to seismic ground shaking from a variety of fault lines throughout the region. A number of faults in the region are considered active features capable of generating future earthquakes that could result in moderate to strong ground shaking at the Project Site. Although the Proposed Project could be subject to severe seismic shaking, construction and operation of the Project would not increase or exacerbate the potential for earthquakes to occur and therefore would not directly or indirectly cause potential substantial adverse effects involving seismically induced ground shaking. Nevertheless, due to the Project's location in a seismically active region, this issue will be further discussed in the EIR. Specifically, data gathering for the EIR will include a geotechnical investigation and associated report(s) that will further evaluate and discuss potential seismic ground shaking at the Project Site. The EIR analysis will then incorporate and summarize the findings of the geotechnical investigation and will come to a conclusion regarding seismic ground shaking hazards.

iii) ***Seismic-related ground failure, including liquefaction?***

**Potentially Significant Impact.** Liquefaction is the process in which saturated silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by an

earthquake. Earthquake waves cause water pressure to increase in the sediment and sand grains lose contact with each other, leading the sediment to lose strength and behave like a liquid. The Project Site is not located within a liquefaction zone; however, the northeast portion of the Project Site is adjacent to the boundary of a liquefaction zone. Additionally, the Public Benefit components of the Proposed Project (Parcel 13 and the Triangle) are mapped within a liquefaction zone (CGS 2020). Due to the Project Site's proximity to liquefiable soils, this issue will be further discussed in the EIR. Specifically, data gathering for the EIR will include a geotechnical investigation and associated report(s) that will further evaluate and discuss potential liquefaction at the Project Site. The EIR analysis will then incorporate and summarize the findings of the geotechnical investigation and will come to a conclusion regarding liquefaction hazards.

**iv) Landslides?**

**No Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are not located within an area identified as being susceptible to earthquake-induced landslides on maps prepared by the state (CGS 2020). There are no known landslides near the Project Site or the Public Benefit components of the Proposed Project (Parcel 13 and the Triangle). These properties are generally flat and are surrounded on all sides by generally flat and developed land. As such, landslides are unlikely to occur on the Project Site, as well as Parcel 13 and the Triangle, and the Proposed Project is not expected to increase or exacerbate the potential for landslides to occur. As such, the Proposed Project would not expose people or structures to adverse risks associated with landslides. No impacts would occur, and this issue will not be further analyzed in the EIR.

**b) Would the Project result in substantial soil erosion or the loss of topsoil?**

**Less Than Significant Impact.** In an urbanized setting, substantial erosion or loss of topsoil typically occurs when ground disturbance causes soils to be exposed, and the soils are washed away during a storm or wind event. Surface structures, such as paved roads and buildings, decrease the potential for erosion. Once covered, soil is no longer exposed to wind or water erosion.

The Proposed Project would cause ground disturbance during construction activities, which can lead to erosion, particularly during a rain event or wind event. However, the construction contractor would be required to comply with the Construction General Permit. The Construction General Permit requires preparation and compliance with a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets. Preparation and implementation of the required SWPPP would reduce construction-related erosion to the extent practicable. During operation, the Project Site would be covered with buildings, hardscape, and landscaping, which would preclude erosion during operation. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.



- c) ***Would the Project 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?***

**Potentially Significant Impact.** As indicated above, the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are not located in an area that is expected to be susceptible to landslides. Additionally, the Project Site is not located within a state-mapped liquefaction hazard zone. However, there are other geotechnical hazards that could be present within the Project area, and the Project Site is immediately adjacent to a known liquefaction zone. The EIR will include a detailed geotechnical report that will characterize any potential hazards in the area and that will present design requirements for the Project. As such, this issue will be further evaluated in the EIR.

- d) ***Would the Project 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?***

**Potentially Significant Impact.** Expansive soils are generally clays, which increase in volume when saturated and shrink when dried. The Proposed Project would be required to comply with California Building Code requirements related to hazards involving potentially expansive soils. Further analysis of the on-site soils will be presented in the EIR based on site-specific geologic reports that will characterize on-site soils. Therefore, this issue will be further analyzed in the EIR.

- e) ***Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

**No Impact.** The Project Site is served by the existing municipal sewer system. The City has established utility services, and no septic systems are either proposed or required to serve the Project. Therefore, no impacts would occur, and this issue will not be further analyzed in the EIR.

- f) ***Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

**Potentially Significant Impact.** As previously discussed, the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are located within an urbanized area and have been subject to disturbance in the past. However, grading, excavation, or other construction activities resulting from implementation of the Proposed Project could potentially disturb undiscovered paleontological resources or unique geologic features, in the event that any are present. The EIR will present the findings of a paleontological resources records search and will identify the potential for the Project to adversely affect such resources. Mitigation measures will be presented if necessary. Therefore, this issue will be further analyzed in the EIR.

## References

CGS (California Geologic Survey). EQ Zapp: California Earthquake Hazards Zone Application. Web mapping application. Accessed September 28, 2020. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.

### 3.8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?***

**Potentially Significant Impact.** The Proposed Project would result in emissions of greenhouse gases (GHGs) during construction and operation. Temporary GHG emissions would result from construction vehicles and equipment. Additionally, during operation, GHG emissions would result from vehicle trips generated by the Proposed Project, as well as building energy and water usage. The Project would be subject to a variety of plans and policies that are in place for the reduction of GHG emissions at the state and local level. Such plans and policies include the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) and the Beverly Hills Sustainable City Plan. Further analysis is required to determine the estimated Project-generated GHG emissions, their impact on global climate change, and the Project's compliance with applicable plans and policies for GHG reductions. Therefore, this issue will be further analyzed in the EIR.

- b) ***Would the Project generate conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?***

**Potentially Significant Impact.** As stated above, there are a variety of plans, policies, and regulations in place for the purpose of reducing GHG emissions. At the state level, the California Air Resources Board (CARB) Scoping Plan provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. Under the Scoping Plan, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage) and changes to the vehicle fleet and associated fuels, among others. Another state regulatory action, Executive Order S-3-05, establishes a goal to reduce statewide GHG emissions to the 1990 level by 2020, and to reduce statewide GHG emissions to 80% below the 1990 level by 2050. At the regional level, the SCAG RTP/SCS sets forth strategies to reduce vehicle miles traveled, to increase use of alternative fuel vehicles, and to improve energy efficiency. At the local level, the City adopted the Beverly Hills Sustainable City Plan in 2009. The Sustainable City Plan is defined as a "tool kit that the City may use, either in whole, or in part to help address sustainability issues."

The plan establishes guiding principles and goals that the City will use to develop and implement programs that focus on sustainability. The plan also provides an implementation framework and a suggested prioritization of strategies (City of Beverly Hills 2009). The EIR will evaluate the Project's consistency with applicable state, regional, and local plans, policies, and regulations that have been adopted for the purpose of reducing GHGs. Therefore, this issue will be further analyzed in the EIR.

## References

City of Beverly Hills. 2009. *Beverly Hills Sustainable City Plan*. February 17, 2009. Accessed September 28, 2020. <http://www.beverlyhills.org/cbhfiles/storage/files/24347783778629768/SustainableCityPlan.pdf>.

## 3.9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**a) *Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

**Less Than Significant Impact.** Relatively small amounts of commonly used hazardous substances, such as gasoline, diesel fuel, lubricating oil, grease, and solvents would be used during construction at the Project Site and would be transported to the Project Site during construction. While some hazardous materials used during construction may require disposal, such disposal activities would only occur for the duration of construction and would not be considered routine. All potentially hazardous materials used during construction would be transported, used, and disposed in accordance with manufacturer's specifications and instructions, thereby reducing the risk of hazardous materials use. Additionally, any such materials would be transported, used, disposed, and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. These existing laws regulate quantities of hazardous materials, promote accident prevention, establish protections from exposure, and regulate storage and disposal. Consequently, use of these materials for their intended purposes during construction would not pose a significant risk to the public or environment.

During operation, hazardous materials that could be routinely used during operation of the Proposed Project include chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, oils, and miscellaneous organics and inorganics that are used as part of typical office building maintenance. Such materials would be used in small quantities, and their use on the Project Site would be consistent with use of similar hazardous materials occurring at other nearby office and commercial uses. As with Project construction, all hazardous materials used on the Project Site during operation would be used, stored, and disposed of in accordance with the manufacturer's specifications and all applicable federal, state, and local requirements. Such materials are not considered to be acutely hazardous when properly used, stored, transported, and disposed. Due to the type of development (commercial offices), operation of the Project would not involve the routine transport of hazardous materials to and from the Project Site. Upon compliance with applicable regulations governing the transport, use, and disposal of hazardous materials, significant impacts would not be anticipated to occur. Impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant. This issue will not be further analyzed in the EIR.

**b) *Would the Project 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?***

**Potentially Significant Impact.** Prior to or in conjunction with Project construction, the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), would be remediated for soil contamination as part of a separate project that is being undertaken by DTSC. The soils on these

properties are known to be contaminated with arsenic. Potential environmental impacts of the remediation process, including impacts pertaining to hazardous materials, have been evaluated in a draft environmental document prepared by DTSC (DTSC 2020a). In that document, DTSC determined that impacts would be below a level of significance. However, due to the history of contamination at the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), more details will be provided in the EIR with regards to potential hazardous materials releases. The EIR will include an evaluation of former hazardous materials releases at the Project Site, including contamination associated with the former railroad uses, as well as records search results for other potential issues such as underground storage tanks and potential contamination in the vicinity of the Project Site.

Project construction would involve the use and storage of commonly used hazardous materials such as gasoline, diesel fuel, lubricating oil, grease, solvents, and other vehicle and equipment maintenance fluids. These substances would be used and stored in designated construction staging areas. These materials would be transported and handled in accordance with all federal, state, and local laws regulating the management and use of hazardous materials. Compliance with applicable regulations would minimize the potential for upset and accident conditions involving the release of potentially hazardous construction materials and chemicals into the environment.

Project operation could involve use of chemical reagents, cleaning solvents, fuels, paints, cleansers, pesticides, fertilizers, oils, and miscellaneous organics and inorganics that are used as part of typical office building maintenance. Upon compliance with applicable regulations governing the transport, use, and disposal of hazardous materials, significant impacts would not be anticipated to occur. Nevertheless, the EIR will include more details and analysis of the potential for Project operation to result in release of hazardous materials into the environment. Therefore, this issue will be further analyzed in the EIR.

**c) *Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?***

**No Impact.** The closest school to the Project Site is the Hawthorne School, located at 624 North Rexford Drive, approximately 0.3 mile north of the Project Site. As such, the Project would not be located within one-quarter mile of an existing preschool or K-12 school. Furthermore, there are no known proposed preschool or K-12 school sites within one-quarter mile of the Proposed Project. As such, the Proposed Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No impact would occur, and this issue will not be further analyzed in the EIR.

**d) *Would the Project be located on a site that 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?***

**Potentially Significant Impact.** Government Code, Section 65962.5, combines several regulatory lists of sites that may pose a hazard related to hazardous materials or substances. The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are located on a Voluntary Cleanup Site (Case #19400017). The cleanup oversight agency is DTSC, and Union Pacific Railroad is responsible for the cleanup (DTSC 2020b). Cleanup would take place under a RAW as part of a separate project. Prior to the commencement of the Proposed Project, it is anticipated that the Project Site, Parcel 13, and the Triangle would be remediated per DTSC requirements and that use of these properties would

not pose a significant hazard to the public or to the environment. However, because these properties are located on an identified cleanup site, and because the cleanup process has yet to commence, this issue will be further analyzed in the EIR.

- e) *For a Project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?*

**No Impact.** The nearest public airport to the Project Site is the Santa Monica Municipal Airport, located approximately 5.5 miles southwest of the Project Site. According to the Los Angeles County Airport Land Use Commission, the Project Site is located outside of the airport land use plan (Los Angeles County Airport Land Use Commission 2003). As such, the Project Site is not within two miles of a public airport, and the Project Site is not located within an airport land use plan. Therefore, the Proposed Project would not create an airplane safety hazard for people residing or working in the Project area. No impact would occur, and this issue will not be further analyzed in the EIR.

- f) *Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**Less Than Significant Impact.** The City has developed two plans to facilitate emergency management: the Emergency Operations Plan (EOP) and the Hazard Mitigation Action Plan (HMAP). The EOP focuses on potential large-scale disasters that may require unusual emergency responses. The plan provides an overview of operational concepts, identifies components of the City's Emergency Management Organization within the Standardized Emergency Management System and the National Incident Management System, and describes the overall responsibilities of federal, state, and local agencies for protecting life and property and ensuring the overall well-being of the population. The HMAP provides resources and information to assist City departments, residents, the public, private sector organizations, and others interested in participating in planning for hazards. The HMAP provides a list of activities that may assist the City in reducing risk and preventing loss from future hazard events. The strategies address multi-hazard issues, as well as activities to address hazard events associated with earthquakes, wildfires, terrorism, earth movements, flooding, and wind storms (City of Beverly Hills 2010).

The construction and operation of up to 11 office buildings on vacant land is not anticipated to interfere with emergency preparedness initiatives or with responses to an emergency. Furthermore, the Proposed Project's design and operations would be required to adhere to applicable aspects of the EOP and the HMAP. As such, the Proposed Project would not obstruct or interfere with implementation of the City's EOP or HMAP. Rather, the plans would proceed in a similar manner with or without the Project.

The City of Beverly Hills' disaster route map identifies Santa Monica Boulevard and Beverly Boulevard, which both border the Project Site, as disaster routes (LADPW 2008). Construction activities can obstruct roadways and/or slow traffic on roadways, potentially impeding evacuation. However, construction trucks associated with the Project would enter and exit the Project Site via Civic Center Drive. Construction staging that requires roadway encroachments (e.g., concrete pumping) would also be conducted from Civic Center Drive. As such, Proposed Project construction is not expected to reduce the lane capacity of Santa Monica Boulevard or Beverly Boulevard. Construction disturbances would be limited to additional truck traffic and worker vehicle traffic along these roadways. Construction truck traffic is not unusual in an urban environment, and truck traffic would be controlled via standard construction best management practices,

which include construction traffic control measures. Furthermore, in the event of an evacuation, it is likely that construction at the Project Site would cease. The evacuation would proceed in a similar manner with or without the Project. As such, Project construction is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

During operations, the Project would increase the number of people present on the Project Site relative to existing conditions. The Project would therefore result in an incremental increase in the number of people who would need to evacuate and/or receive emergency services, particularly during business hours. However, as explained in Section 3.14, the employment growth associated with the Project would fall well within projections for the City, is not substantial, and has been accounted for in local and regional planning efforts. As such, the additional employees associated with the Project would not substantially alter the proceedings of the City's emergency response plan or evacuation plan. Furthermore, the Project's egress is onto Civic Center Drive, and no driveways would be situated along Santa Monica Boulevard or Beverly Boulevard. This would minimize the Project's effects on designated emergency evacuation routes (Santa Monica Boulevard or Beverly Boulevard). Employees of the Project would exit onto Civic Center Drive and could then evacuate in a southerly direction along Beverly Boulevard, Foothill Road, or Civic Center Drive. For these reasons, Proposed Project operations are not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Furthermore, the Proposed Project would not introduce any physical obstructions or impairments to emergency response or evacuation. The Beverly Hills Fire Department would review the Proposed Project plans to ensure adequate emergency access in and around the site as part of the building plan check process. The plans would be adjusted in the event that the fire department identifies any deficiencies in access that could preclude emergency evacuation or emergency response. In the event of a disaster during Project construction or operation, the City's emergency plans would proceed in a similar fashion with or without the Proposed Project. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

**g) *Would the Project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?***

**Less Than Significant Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are not within a Very High Fire Hazard Severity Zone (VHFHSZ). At its closest point, the nearest VHFHSZ is located approximately 0.6 miles north of the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle). Within the City, this zone is located north of Sunset Boulevard and generally coincides with the foothills of the Santa Monica Mountains (CAL FIRE 2020). As such, the Project Site, Parcel 13, and the Triangle are not within a VHFHSZ and are separated from the VHFHSZ by a major four-lane roadway (Santa Monica Boulevard) and over a half-mile of urban and suburban development. In the unlikely event of a fire emergency at the Project Site due to wildland fires, the Beverly Hills Fire Department (specifically Fire Station 1, located 0.1 miles south of the Project Site), would provide fire protection services. Due to the urbanized nature of the area and the provision of nearby firefighting protection services, implementation of the Proposed Project is not anticipated to expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.



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## 3.10 Hydrology and Water Quality

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) Result in substantial erosion or siltation on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
iv) Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the Project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?***

#### Surface Water Quality

**Less Than Significant Impact.** Short-term construction activities for the Proposed Project would have some potential to affect the quality of stormwater discharged from the Project Site. Land disturbance activities could result in erosion and sedimentation (particularly during a rain event). Because on-site soils have the potential to be contaminated, soils that are carried off site during a storm could introduce pollutants to the runoff. Spills or leaks of petroleum products used by construction equipment could also affect the quality of stormwater. Such discharges would have the potential to violate water quality standards or waste discharge requirements, resulting in a potentially significant impact. However, the construction contractor would be required to comply with a number of regulatory requirements that would minimize the potential for water pollutants to exit the construction disturbance areas. One such requirement is the Construction General Permit, which requires preparation and compliance with a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include erosion control measures such as covering exposed soil stockpiles and working slopes, lining the perimeter of the construction site with sediment barriers, and protecting storm drain inlets. Additionally, the construction contractor would be required to implement a Soil Management Plan that has been reviewed and approved by DTSC. This plan would include measures that would prevent soils from leaving the Project Site as part of stormwater runoff. In addition to implementation of the SWPPP and the Soil Management Plan, standard site management practices and typical equipment maintenance would generally preclude leaks and spills of a magnitude that would adversely affect stormwater runoff. As such, potential water contaminants would be confined to the construction disturbance areas to the extent practicable, thereby minimizing potential adverse effects to surface water quality.

The Project Site is currently vacant and generally unpaved. After construction, the Project Site would be covered with buildings, hardscape, and landscape, and the percentage of the Project Site that is impervious would increase. Increased imperviousness has the potential increase stormwater runoff volumes. Stormwater runoff from urban development also has the potential to carry pollutants associated with the development, such as trash and spilled or leaked chemicals (e.g., cleaning products). However, locating parking underground would limit discharge of spilled petroleum or debris typically associated with surface parking areas. As such, converting the Project Site from a generally vacant, undeveloped property to a property developed with office uses has the potential to increase runoff volumes and/or runoff pollutants, such that water quality standards could be violated, resulting in a potentially significant impact. However, the Proposed Project design would be required to comply with the City's Low Impact Development (LID) requirements, as established in Title 9, Chapter 4, Article 5 (Stormwater and Urban Runoff Pollution Control) in the City's Municipal Code. Specifically, Section 9-4-508 requires new development projects to control pollutants and runoff volume from the project site by minimizing the impervious surface area and controlling runoff through infiltration, bioretention, and/or rainfall harvest and use in that preferred order. Best management practices (BMPs) are required to remain on site the stormwater quality design volume (which is defined in Section 9-4-508. For projects that are unable to retain 100% of the stormwater quality design volume due to technical infeasibility, alternative compliance measures must be implemented. Alternative compliance methods include biofiltration and off-site infiltration. The remaining stormwater quality design volume that cannot be retained or biofiltered on site must be treated on site to reduce pollutant loading. The City's Public Works Department would review the Proposed Project as Compliance with LID requirements would ensure that stormwater runoff volumes and pollutants are minimized to the extent practicable and would also ensure operational compliance with applicable water quality standards and waste discharge requirements. Upon compliance with required water quality regulations (namely, the Construction General Permit and LID requirements), the Proposed Project is not expected to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface water quality. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

### **Groundwater Quality**

**Potentially Significant Impact.** Groundwater is located 45 to 52 feet below ground surface at the Project Site and Parcel 13 (DTSC 2020). During construction, the Project Site would be excavated to a depth of approximately 25 feet. As such, groundwater is not expected to be encountered during construction. The required SWPPP and standard site management practices, which would include spill prevention and cleanup guidelines, would protect groundwater from contamination by construction activities. The presence of an underground storage tank or the removal of an underground storage tank could also present a potential threat to groundwater quality during construction. While no underground storage tanks are expected to be present within the Project Site, in the unlikely event that they are found during excavation, potentially contaminated materials would be removed in accordance with all applicable federal, state, and local regulations. Therefore, underground storage tanks would not pose a significant hazard to groundwater quality.

During operations, groundwater quality would likely be protected, as the entire site would be covered by the impervious basement floor and walls, preventing urban runoff pollutant intrusion into the groundwater system. However, in the event that infiltration is pursued as a LID design feature, this topic will require further discussion in the EIR. Further analysis is required to ensure that pollutants are not introduced during infiltration.

- b) *Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

#### **Groundwater Use**

**Less Than Significant Impact.** The Proposed Project would not include construction of any groundwater wells and, thus, would not directly use groundwater. The Proposed Project would increase water demand relative to existing conditions. Water would be used for dust control during construction, and operation of the proposed offices would require water for landscaping irrigation and standard building operations. Water for construction and operation would be obtained from the municipal water service, which is provided by the City of Beverly Hills Public Works Department. The City's primary source of water is imported surface water from the Metropolitan Water District. The City has historically pumped groundwater from the Hollywood Subbasin (which underlies the City of West Hollywood and the northern portions of the City of Beverly Hills). However, the City's water treatment plant (which is used to treat pumped groundwater) is currently offline, so the City is relying solely on imported water. The water treatment plant is expected to resume operation once planned improvements are completed (anticipated in 2021), and the City also has plans to expand groundwater pumping in the future. By 2022, the City of Beverly Hills plans to source approximately 30% of its water supply from groundwater (City of Beverly Hills 2019, 2016). The Project is expected to be operational after 2022; as such, a portion of the Proposed Project's water demand may be met through groundwater use. However, groundwater pumping would be limited by the capacity of the groundwater wells, and not by water demand. Per Table 7-4A within the Urban Water Management Plan, pumping is anticipated to remain the same regardless of the year or of drought conditions (City of Beverly Hills 2016). As such, development of the Proposed Project would not alter or affect planned groundwater pumping volumes. Plans for groundwater pumping and improvements are currently underway and would proceed with or without the Proposed Project. For these reasons, development of the Proposed Project would not substantially utilize groundwater supplies such that the Project would impede sustainable groundwater management. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

#### **Groundwater Recharge**

**Potentially Significant Impact.** The Proposed Project would increase the imperviousness of the Project Site, as it involves development of office buildings on a currently vacant site. Developing a currently pervious area has the potential to interfere with groundwater recharge, as water can no longer percolate through the site. The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are located within the Hollywood Subbasin (City of Beverly Hills 2010). Underlying groundwater is replenished by percolation of precipitation and by subsurface flow from alluvial channels originating in the Santa Monica Mountains to the north (DTSC 2020). Development of the Proposed Project would generally preclude percolation from occurring at the Project Site; as such, this topic will be further discussed in the EIR.

- c) ***Would the Project 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:***

- i) ***Result in substantial erosion or siltation on or off site;***

**Less Than Significant Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), do not contain any streams or rivers. As such, no streams or rivers would be altered by the Proposed Project. However, ground disturbance during construction would have the potential to result in erosion or siltation on or off site, as exposed soils could enter stormwater runoff, resulting in erosion and/or siltation, or could be eroded in a wind event. As discussed under Section 3.10(a), all construction activities would be required to comply with a SWPPP and a Soil Management Plan. Implementation of these required plans would protect exposed soils from erosion during construction. During operations, the amount of impervious surfaces on the Project Site would increase, and urban land uses (e.g., offices) would be introduced to the Project Site. As such, the rate and volume of urban stormwater runoff could increase from the site. However, the design and operation of the Project would be required to adhere to LID standards (as described under Section 3.10(a)), ensuring that the volume and rate of stormwater runoff from the Project Site would be minimized to the extent feasible. Furthermore, any stormwater effluent from the Project Site would be expected to enter the City's existing stormwater drainage system and, therefore, would not lead to off-site erosion or siltation. As such, the Proposed Project would not have the potential to result in substantial erosion or siltation on or off site. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

- ii) ***Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site;***

**Less Than Significant Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), do not contain any streams or rivers. As such, no streams or rivers would be altered by the Proposed Project. As discussed under Section 3.10(a), Proposed Project construction would be required to comply with a SWPPP. Implementation of the SWPPP would control runoff from the site during construction and would minimize the potential for flooding to occur on or off site. During operations, the amount of impervious surfaces on the Project Site would increase, and urban land uses (e.g., offices) would be introduced to the Project Site. As such, the rate and volume of urban stormwater runoff could increase from the site, which could lead to flooding on or off site. However, the design and operation of the Project would be required to adhere to LID standards (as described under Section 3.10(a)), ensuring that the rate and volume of runoff from the Project Site would be minimized to the extent feasible. Implementation of LID features would reduce the potential for the Project to cause flooding. Through compliance with the stormwater management requirements described above, the Proposed Project would not result in substantial flooding on or off site. Impacts would be less than significant, and this issue will not be further evaluated in the EIR.

- iii) ***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***

**Potentially Significant Impact.** Under existing conditions, the Project Site generally drains from southwest to northeast, with half of the site draining to an existing concrete gutter located along Santa Monica Boulevard and half of the site draining to an existing valley gutter located at the bottom of the existing parking stalls along Civic Center Drive. Runoff from the site ultimately discharges into catch basins located adjacent to Beverly Boulevard on Santa Monica Boulevard and Civic Center Drive. The catch basins along Santa Monica Boulevard flow into an existing 57-inch storm drain main in Santa Monica Boulevard that continues to the northeast. The catch basins along Civic Center drive flow into an existing 24-inch storm drain that continues to the northeast. The existing storm drain system is owned by the City of Beverly Hills (Psomas 2020).

During construction, implementation of the required SWPPP is expected to limit stormwater runoff volumes from the site, as well as potential construction-related runoff pollutants. Implementation of the SWPPP would generally preclude stormwater contaminants (e.g., soils or spilled chemicals) from exiting the construction area. During operations, the Project would be designed and operated in compliance with LID requirements. Compliance with LID requirements would reduce stormwater runoff volumes and runoff rates. Compliance with LID requirements would also reduce stormwater pollutants and/or prevent pollutants from entering the stormwater drainage system. Required compliance with a SWPPP and LID provisions is expected to ensure that the Proposed Project would not result in exceedances of the stormwater drainage system or result in substantial additional sources of polluted runoff. However, as part of Project planning and design, a stormwater infrastructure capacity study will be conducted, and the findings will be presented in the EIR. As such, discussion of this topic as it relates to the capacity of existing utilities will be provided in the EIR. However, for the purposes of water quality, stormwater impacts would be less than significant due to compliance with regulations that limit runoff and runoff pollutants.

- iv) ***Impede or redirect flood flows?***

**No Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), do not contain any streams or rivers having the potential to be altered by the Proposed Project. The Project Site, as well as Parcel 13 and the Triangle, are located within a highly urban area and are located outside of the 100-year flood hazard zone (DWR 2020). As such, the Proposed Project would not impede or redirect flood flows. Therefore, no impacts associated with impeding or redirecting flood flows would occur. This issue will not be further analyzed in the EIR.

- d) ***In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation?***

**Less Than Significant Impact.** As stated in Section 3.10(c)(iv), the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are located outside of a flood hazard zone. As such, hazards related to flooding would not be expected. Tsunamis are large ocean waves caused by the sudden water displacement that results from an underwater earthquake, landslide, or volcanic eruption. Tsunamis affect low-lying areas along the coastline. The Project Site, as well as Parcel 13 and the Triangle, are located approximately 8 miles northeast of the Pacific Ocean. As such, the Project area would not be susceptible to inundation by tsunami.



Seiches are oscillations generated in enclosed bodies of water, usually as a result of earthquake-related ground shaking. A seiche wave has the potential to overflow the sides of a containing basin to inundate adjacent or downstream areas. The Lower Franklin Canyon Reservoir is located approximately 1.9 miles northwest of the Project Site, as well as Parcel 13 and the Triangle. However, the distance and geographic boundaries between the Project area and this body of water reduces the risk of a seiche affecting the Project area. Specifically, the City's General Plan states that the residential area north Carmelita Avenue may be exposed to flood hazards in the event of a reservoir breach. Below Carmelita Avenue, flood dangers would diminish, but structures could still experience flooding. The Proposed Project is located approximately 0.2 miles south of Carmelita Avenue. As such, substantial flooding hazards are not expected to occur at the Project Site, but some flooding could still occur.

In the unlikely event of a catastrophic flood, the Project could contribute pollutants to floodwaters (e.g., debris and sediments from landscaped areas and other pollutants typical of urban land uses, such as trash, leaked fuels, fertilizers, or spilled cleaning chemicals). Land uses surrounding the Project Site are also urban in nature and would thus contribute similar pollutants to floodwaters. As such, the Proposed Project would not introduce a unique or substantial new risk relative to existing conditions. With or without the Project, a catastrophic flood in the area would be expected to wash away dirt and debris from urban land uses. As such, impacts would be less than significant, and this issue will not be further evaluated in the EIR.

e) ***Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?***

**Potentially Significant Impact.** Water quality control plans are designed to preserve and enhance water quality and protect the beneficial uses of all downstream water bodies. The federal Clean Water Act requires states to adopt water quality standards for water bodies. Water quality standards consist of designated beneficial uses for a particular water body, along with water quality criteria necessary to support those uses. Water quality criteria are set concentrations or levels of constituents. When designated beneficial uses of a particular water body are being compromised by water pollution, Section 303(d) of the Clean Water Act requires identifying and listing that water body as "impaired." Once a water body has been deemed impaired, a total maximum daily load (TMDL) must be developed for each impairing water quality constituent. Water quality for all surface water and groundwater within the greater Los Angeles area is regulated under the jurisdiction of the Los Angeles Regional Water Quality Control Board (RWQCB). Water quality standards for all waters in the region are discussed in the region's Basin Plan. The City is located within the Ballona Creek Watershed. Contaminants within Ballona Creek include cyanide, copper, bacteria, lead, toxicity, zinc, trash, viruses (SWRCB 2017). The Ballona Creek Watershed has an Enhanced Watershed Management Program, with a primary objective of determining the network of control measure (or, BMPs) that will achieve required pollutant reductions while also providing multiple benefits to the community and leveraging sustainable green infrastructure practices (Ballona Creek Watershed Management Group 2016).

As described above, the Proposed Project would generate water quality pollutants typical of commercial and office uses. Such pollutants would include sediments, trash and debris, spilled or leaked chemicals, nutrients, pesticides, oil, grease, and metals. Compliance with the City's Stormwater and Urban Runoff Pollution Control requirements and implementation of construction BMPs would minimize the potential for such pollutants to exit the Project Site as runoff contaminants. Upon compliance with applicable requirements, the Proposed Project would not be expected to conflict with plans and policies for the protection of the Ballona Creek Watershed.

Other water quality control plans pertaining to the Project also include LID requirements. As previously discussed under Section 3.10(a), the Proposed Project would comply with LID requirements and would also be required to comply with other applicable municipal code requirements pertaining to water quality. As a result, the Proposed Project is not expected to conflict with or obstruct implementation of a water quality control plan.

A sustainable groundwater management plan, also known as a groundwater sustainability plan, demonstrates management and use of groundwater in a manner that can be maintained during a planning and implementation horizon without causing undesirable results. Water to be consumed by the Project would be provided by the City, which typically sources a portion of its water supply from groundwater pumped from the Hollywood Subbasin. The City also has plans to begin pumping groundwater from the La Brea Subarea. California's Department of Water Resources has designated the Hollywood Subbasin and the Central Basin (including the La Brea Subarea) as having very low priority in regards to enacting a Groundwater Sustainability Plan (CDWR 2020). However, this does not preclude a Groundwater Sustainability Plan from being developed. In the event that a Groundwater Sustainability Plan were to be prepared for the Hollywood Subbasin and/or the La Brea Subarea, the City would be subject to compliance with the plan(s). Groundwater pumping would be limited by the capacity of the groundwater wells, and not by water demand. Based on these limitations and continued groundwater monitoring, implementation of the Project would not substantially deplete groundwater supplies such that sustainable management of the Hollywood Subbasin or the La Brea Subarea would be impeded. Furthermore, the Project would not prohibit or impede the City's planned groundwater initiatives enumerated in the City of Beverly Hills' Water Enterprise Plan, which include monitoring and applying for grants, abiding by the requirements of the Sustainable Groundwater Management Act, initiating discussions aimed at participation in a water bank, notifying the City of Los Angeles of the City of Beverly Hills' interest in participating in a future recycled water program when future construction is planned in Beverly Hills, and staying abreast of water rights issues and cessation filings. Other, longer-term actions include revisiting the Water Enterprise Plan at least every ten years (and possibly more frequently) and participating in the Los Angeles Recycled Water Program (City of Beverly Hills 2017). These initiatives would help protect sustainable groundwater supply for the City of Beverly Hills. Furthermore, the Proposed Project would not change the groundwater pumping plans of the City of Beverly Hills. However, as described in Section 3.10(b), the Proposed Project would increase the imperviousness of the Project Site. This issue will be further discussed in the EIR as it relates to groundwater recharge. As such, while the Proposed Project is not expected to conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, this topic will be further discussed in the EIR, particularly in relation to groundwater recharge.

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### 3.11 Land Use and Planning

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**a) *Would the Project physically divide an established community?***

**Less Than Significant Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are bound by existing, major roadways on all sides. Santa Monica Boulevard is a four-lane, heavily trafficked roadway that extends along the northwest boundaries of these properties. Civic Center Drive extends to the south of the Project Site and Parcel 13, and the eastbound lanes of Santa Monica Boulevard extend to the south of the Triangle. Under existing conditions, the three properties are fenced. As such, these properties do not provide physical connections within an established community. Rather, they are unused properties within an urbanized environment that are generally closed off from the public. As such, development of the Project Site and transfer of Parcel 13 and the Triangle to City ownership would not result in a physical division within an established community. Furthermore, the Proposed Project does not include features such as a new highway, new aboveground infrastructure, or an easement through an established neighborhood, which are features that may result in physical divisions within a community. For these reasons, the Proposed Project's impacts would be less than significant. This issue will not be further analyzed in the EIR.

**b) *Would the Project 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?***

**Potentially Significant Impact.** The City has numerous land use policies and regulations that have been adopted to avoid or mitigate environmental effects. As described throughout this Initial Study, the Proposed Project may result in potentially significant environmental impacts, depending on the results of more detailed technical analyses that will be presented in the Project's EIR. As such, the analyses in the EIR will demonstrate whether the Project may potentially conflict with land use plans, policies, or regulations that have been adopted for the purpose of avoiding or mitigating an environmental effect. As such, further analysis of this issue will be provided in the EIR.

#### References

None.

## 3.12 Mineral Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**a) *Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?***

**No Impact.** The Division of Mines and Geology (renamed the California Geological Survey in 2006) has mapped the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), as Mineral Resources Zone 1 for aggregate resources. Mineral Resource Zone 1 is a designation given to areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence (Division of Mines and Geology 1979).

According to the California Geologic Energy Management Division (CalGEM), there are no oil, gas, geothermal, or other known wells located on the Project Site, or Parcel 13 and the Triangle. There are several plugged or idle oil and gas wells located approximately 0.4 miles east and southeast of the Project Site, and a majority of the Project Site is located within the San Vicente Oil and Gas Field. (The northeast tip of the Project Site, as well as Parcel 13 and the Triangle, are located outside of the oil and gas field.) The Project Site was historically used for railroad purposes, and there are no records of oil drilling or drilling attempts within the Project Site, as reported on the CalGEM Well Finder map (CalGEM 2020). As such, development of the Project Site would not interfere with any existing or previous oil drilling activities within the Project Site. Furthermore, the Project Site is across the street from a park and residential uses (to the north) and from office buildings (to the south and southwest). The Project Site is also located along a prominent roadway in the City, near the City's eastern gateway. Due to these surrounding land uses, future development of oil drilling at the Project Site is not expected to be practicable. As such, the Project Site does not currently support mineral extraction activities, nor would it be expected to support such activities in the future. As such, no impact would occur, and this issue will not be further analyzed in the EIR.

**b) *Would the project 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 Impact.** According to the City's General Plan, the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are within Mineral Resource Zone 3, a designation given to "areas containing mineral deposits the significance of which cannot be evaluated from available data"

(City of Beverly Hills 2010). The City's General Plan also identifies the San Vicente Oil Field. The General Plan sets forth policies to prohibit new drilling sites and to phase out existing drilling sites. Specifically, General Plan Policy CON 21.1 states "Prohibit new drill sites in new locations within the City for production of oil, gas, or other hydrocarbon substances" and Policy CON 21.2 states "Develop a plan to phase out existing oil drilling sites as soon as practicable." As such, the City has not delineated a specific mineral resource recovery site on the Project Site. Furthermore, if oil or gas resources were available on the Project Site, the City has land use policies that would disallow the development of new drilling. For these reasons, the Project would not result in the loss of availability of a locally important mineral resource recovery site. No impact would occur, and this issue will not be further analyzed in the EIR.

## References

- City of Beverly Hills. 2010. *City of Beverly Hills General Plan*. April 30, 2010. Accessed September 26, 2020. <http://www.beverlyhills.org/departments/communitydevelopment/longrangeplanning/generalplan/generalplandocument/>.
- Division of Mines and Geology. 1979. *Mineral Land Classification Map– Beverly Hills Quadrangle –Special Report 143 Plate 2.5*. [map]. Prepared May 25, 1979. Accessed September 27, 2020. <https://maps.conservation.ca.gov/mineralresources/>.
- CalGEM (California Geology Energy Management Division). 2020. CalGEM GIS: Well Finder. Accessed September 27, 2020. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-118.38338/34.08147/15>.

### 3.13 Noise

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project result in:				
a) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Generation of excessive groundborne vibration or groundborne noise levels?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) **Would the Project result in 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?**

**Potentially Significant Impact.** Implementation of the Proposed Project would result in two primary types of potential noise impacts: short-term (i.e., temporary) noise during construction and long-term noise during operation. There are sensitive receptors (residences) located approximately 140 feet from the Project Site. These land uses could be impacted by noise from Project construction and operation. The EIR will quantify the anticipated noise increases that could be associated with Proposed Project construction and operation and will evaluate potential impacts to nearby sensitive receptors utilizing methodology and established noise level requirements within the Beverly Hills Municipal Code noise regulations and within the City's General Plan Noise Element. As such, this issue will be further analyzed in the EIR.

- b) **Would the Project result in generation of excessive groundborne vibration or groundborne noise levels?**

**Potentially Significant Impact.** Operation of certain types of construction equipment can cause vibrations that spread through the ground and diminish in strength with distance. There are a variety of vibration-sensitive receptors within the vicinity of the Project Site, including residential uses approximately 140 feet from the Project Site and the Civic Center, which is approximately 30 feet from the Project Site. The EIR will quantify the anticipated vibration that could be produced by the Project and will evaluate potential impacts to nearby sensitive receptors, including any potential historic resources that could adversely be affected by construction vibration. As such, this issue will be further analyzed in the EIR.



- c) *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 Impact.** The nearest public airport to the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), is the Santa Monica Municipal Airport, located approximately 5.5 miles to the southwest. According to the Los Angeles County Airport Land Use Commission, the Project Site, as well as Parcel 13 and the Triangle, are located outside of the airport land use plan (Los Angeles County Airport Land Use Commission 2003). As such, the Project Site, Parcel 13, and the Triangle are not located within 2 miles of a public airport or within an airport land use plan. Additionally, the Project Site, as well as Parcel 13 and the Triangles are not located within the vicinity of a private airstrip. Therefore, the Proposed Project would not expose people residing or working in the Project area to excessive noise levels related to aircraft use. No impacts would occur, and this issue will not be further analyzed in the EIR.

## References

Los Angeles County Airport Land Use Commission. 2003. Santa Monica Airport, Airport Influence Area. May 13, 2003. Accessed September 29, 2020. [http://planning.lacounty.gov/assets/upl/project/aluc\\_airport-santa-monica.pdf](http://planning.lacounty.gov/assets/upl/project/aluc_airport-santa-monica.pdf).

## 3.14 Population and Housing

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

- a) *Would the Project 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)?*

**Less Than Significant Impact.** The Project would not involve development of residences and would not, therefore, have the potential to result in direct population growth by expanding the residential population of the City. Additionally, the Project would not develop new infrastructure, such as the extension of roads or utility services, that could encourage or facilitate population growth. Rather, the Proposed Project would

involve developing up to 11 new office buildings and transferring ownership of Parcel 13 and the Triangle to the City. As such, the Proposed Project would lead to an increase in employment opportunities within the City. Based on the square footage of office area that would be developed, the Project Site is expected to support approximately 360 employees (SCAG 2001). Transferring ownership of Parcel 13 and the Triangle would not result in employment growth or population growth. The employment growth associated with the proposed office buildings is analyzed further below.

### **Employment Growth**

The Demographics and Growth Forecast technical report in SCAG's 2020–2045 RTP/SCS shows population, housing, and employment growth projections for the City. According to this report, the City had 74,600 jobs in 2016 and is expected to accommodate 81,300 jobs by 2045 (SCAG 2020). Additionally, SCAG's 2016-2040 RTP/SCS included a Demographics and Growth Forecast Appendix which identifies that the City had 57,700 jobs in 2012 and is expected to accommodate 68,900 jobs by 2040 (SCAG 2016). The Proposed Project is expected to be operational around 2024. Assuming that the City keeps pace with SCAG's growth projections and that growth is evenly divided across the planning horizon, the City is expected to experience an increase of approximately 892 jobs between the time of this writing (2020) and the time of Project buildout (2024). The employment provided at the Project Site upon Project buildout would fall well within these projections. Assuming that the Proposed Project would accommodate new businesses in the City (as opposed to businesses that relocate from office buildings elsewhere in the City), the Project is expected to create approximately 360 new jobs in the City. This growth equates to approximately 6.5% of the total employment growth that is projected to occur between 2020 and 2045 and approximately 40% of the growth that is expected to occur between the time of this writing (2020) and the Project's anticipated buildout year (2024). As such, employment growth associated with the Proposed Project would fall well within the previous and current growth projections for the City. This indicates that the Proposed Project would not outpace regional infrastructure, since the SCAG RTP/SCS is used for local and regional planning purposes.

Proposed Project construction may also increase employment in the City. However, given the relatively common nature of the proposed construction activities, the demand for construction employment would likely be met within the existing and future labor market in the City and in the surrounding metropolitan area. If construction workers live outside of the City, these workers would likely commute during the temporary construction period.

### **Residential Growth**

Because the Proposed Project would be located in the densely populated Los Angeles metropolitan area, it is anticipated that jobs within the new office buildings would be filled by existing City residents or by residents of neighboring cities. In the event that some of the new employees relocate to the City upon obtaining a job at the Project Site, this would result in minor to negligible population growth. Even in the unlikely event that all new employees moved to the City along with an average-sized household, the resulting residential population growth would fall well within population growth projections for the City. The average household size in the City is 2.3 people per household (SCAG 2019). As such, 360 employees plus one household per employee would equate to a total population growth of 828 people. According to SCAG, the City had a population of 34,504 people in 2018 (SCAG 2019). According to SCAG's 2020–2045 RTP/SCS, the City's population is expected to grow to 35,800 people by 2045, equating to an increase of 1,296 people (SCAG 2020). According to SCAG'S 2016–2040 RTP/SCS, the City's population is expected to grow to 37,200 people by 2040, equating to an

increase of 2,696 people (SCAG 2016). As such, in the unlikely event that all Project employees and their households relocated to the City, the resulting population growth would fall within population growth projections for the City. This scenario is unlikely, because the Project Site is situated within a densely populated area, as explained above. Jobs that would be available at the Project Site are expected to be filled by existing City residents or by residents of nearby cities who would commute to the Project Site.

In conclusion, the Project would result in employment growth within the City. However, this employment growth would fall well within job growth projections for the City and would not be expected to lead to substantial population growth. For these reasons, impacts would be less than significant. This issue will not be further analyzed in the EIR.

**b) *Would the Project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

**No Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), do not support housing or employment. As such, development of the Proposed Project would not displace people or housing, such that construction of replacement housing would be needed elsewhere. No impact would occur, and this issue will not be further analyzed in the EIR.

**References**

SCAG (Southern California Associated of Governments). 2001. *Employment Density Study Summary Report*. Prepared by Natelson Company in association with Terry A. Hayes Associates. October 31, 2001.

SCAG (Southern California Association of Governments). 2016. *2016-2040 RTP/SCS, Demographics & Growth Forecast Appendix*.

SCAG (Southern California Association of Governments). 2019. Profile of the City of Beverly Hills. May 2019. Accessed September 27, 2020. <https://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx>.

SCAG (Southern California Association of Governments). 2020-2045 *RTP/SCS, Demographics & Growth Forecast*. Draft. Accessed October 28, 2020. <https://www.connectsocal.org/Pages/Connect-SoCal-Final-Plan.aspx>.

### 3.15 Public Services

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

#### Fire protection?

**Less Than Significant Impact.** Fire protection, rescue services, and emergency medical (paramedic) services in the City are provided by the Beverly Hills Fire Department (BHFD). The closest fire station to the Project Site is Fire Station 1 (445 North Rexford Drive, Beverly Hills; 0.1 miles south of the Project Site). As discussed in Section 3.14, Population and Housing, the Project would not include housing that would result in a direct increase in the City's population to be served by BHFD. However, the Project would result in the net increase of approximately 128,282 square feet of commercial space on a currently undeveloped site. As such, Project implementation would increase the building area and use of the Project Site when compared to existing conditions, thereby increasing the demand for BHFD services.

The proposed commercial uses would be expected to generate a range of fire service calls similar to what occurs under existing conditions in the vicinity of the Project Site. The Project would not include any unique hazardous uses, such as industrial facilities, that use or generate large quantities of hazardous and/or toxic materials that could pose an extreme risk of serious accident or fire at the Project Site. The types of fires that could potentially occur within the Project Site would be adequately suppressed with the fire equipment found at the fire stations nearest the Project Site. Additionally, the Project would be required to comply with the California Fire Code, Universal Building Code, and BHFD standards, including specific construction specifications, access design, location of fire hydrants, and other design requirements. Compliance with applicable regulatory requirements, including BHFD's fire/life safety plan review and demonstrating that adequate fire flow exists, per approval by the Public Works Department, would ensure that adequate fire prevention features would be incorporated into the Project that would reduce the demand on BHFD facilities and equipment resulting from Project construction and operation. Further, through consultation with the

BHFD, existing fire protection services were determined to be sufficient in order to provide services at the Project Site (City of Beverly Hills 2020).

Therefore, the Project would not require the addition of a new fire station or new fire protection services, the construction and/or expansion of which could result in environmental impacts. Operation of the Project would not result in substantial adverse physical impacts associated with the provision of new or expanded fire services in order to maintain acceptable fire protection services at the Project Site. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

#### **Police protection?**

**Less Than Significant Impact.** Police protection services in the City are provided by the Beverly Hills Police Department (BHPD). Protection services include emergency and non-emergency police response, route police patrols, investigative services, traffic enforcement, traffic investigation, and parking code enforcement. The police station closest to the Project Site is located at 464 North Rexford Drive, Beverly Hills, which is across the street from the Project Site (on the southwest side of Civic Center Drive).

As discussed in Section 3.14, Population and Housing, the Project would not include housing that would result in a direct increase in the City's population to be served by BHPD. However, the Project would result in the net increase of approximately 128,282 square feet of commercial space on a currently undeveloped site immediately across the street from the police station. As such, Project implementation would increase the building area and use of the Project Site when compared to existing conditions, thereby incrementally increasing the demand for BHPD services.

Given BHPD's metrics for evaluating service capacity based on residential population, the Project's increase in the police service population would not affect the officer-to-resident ratio within the City since the Project is not anticipated to directly increase the residential population within the City. Additionally, the Project would incorporate security features to reduce the demand for police protection services. These features would include sufficient lighting throughout the Project Site to ensure safety and visibility with illuminated entryways, walkways, closed circuit television monitoring, and the entrance(s) to the underground parking.

During Project construction, improvements below and within Civic Center Drive would be required, thereby potentially affecting access to the police station located across the street from the Project Site. However, while small portions of Civic Center Drive would be closed for a short duration during construction, two-way vehicular traffic flow would be maintained along Civic Center Drive, and curb parking would continue to be allowed in designated areas throughout construction, thereby ensuring that vehicles traveling to and from the police station via Civic Center Drive would still have access.

Therefore, overall, the proposed construction and operation of up to 11 new office buildings occupied by up to 360 new employees within the City does not have the potential to notably increase service calls for police protection. Therefore, the Project would not require the addition of a new police station or new police protection services, the construction and/or expansion of which could result in environmental impacts. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

### Schools?

**Less Than Significant Impact.** The City is served by the Beverly Hills Unified School District (BHUSD). The need for new school facilities is typically associated with a population increase that generates an increase in enrollment large enough to cause schools to be constructed or existing schools to be expanded. The Proposed Project does not include a residential component and is not expected to substantially increase the residential population of the City (see Section 3.14). Nonetheless, as required by Senate Bill 50, the Project Applicant would be required to pay development fees for schools to BHUSD prior to the issuance of a building permit. Pursuant to Government Code Section 65995, the payment of school development fees is considered mitigation for any potential school service-related impacts. As such, the Proposed Project is not expected to cause increases in demand for school facilities such that new or expanded facilities would be needed. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

### Parks?

**Less Than Significant Impact.** Physical deterioration of park facilities is usually caused by overuse due to a lack of additional/alternative facilities to accommodate population growth. The Proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth, as explained in Section 3.14. While employees at the Project Site could use nearby parks, including Beverly Gardens Park located immediately north of Santa Monica Boulevard and the Project Site, Beverly Hills Community Dog Park located 0.2 mile northeast of the Project Site, and Rexford Mini Park located 0.7 mile southwest of the Project Site, they would be expected to primarily use parks near to their place of residence. Additionally, the Proposed Project would include landscaped and outdoor areas that could be used by employees during breaks, including terraces and garden areas that would be situated between the office buildings. Furthermore, as required under Beverly Hills Municipal Code Article 7, park and recreation taxes are required to be paid for a variety of development projects in the City, including commercial buildings. As such, development of the Proposed Project is not expected to result in increased demands to park facilities such that new or expanded facilities would be required. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

### Other public facilities?

**Less Than Significant Impact.** Other public facilities and services provided within the City include library services and City administrative services. Library services are provided at the Beverly Hills Public Library, located at 444 North Rexford Drive, Beverly Hills, which is approximately 0.1 mile southwest of the Project Site. Increased use of library services is generally associated with an increase in residents. While the employees of the Proposed Project could use the local library services, employees are generally expected to primarily use libraries near their place of residence. City administrative services are provided within the City of Beverly Hills Civic Center, which is located to the southwest of the Project Site (on the southwest side of Civic Center Drive). Similar to library services, employees are expected to use City administrative services near their place of residence. As such, development of the Proposed Project is not expected to result in increased demands to other public facilities (such as library services or City administrative services) such that new or expanded facilities would be required. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

## References

City of Beverly Hills. 2020. Telephone communication between Masa Alkire, Cece Sohn and Michael Hand (City of Beverly Hills) and Dudek. November 30, 2020.

## 3.16 Recreation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

**Less Than Significant Impact.** Physical deterioration of park facilities is usually caused by overuse due to a lack of additional/alternative facilities to accommodate population growth. The Proposed Project would not include the construction of any infrastructure or housing that would directly or indirectly induce significant population growth in the surrounding area, as explained in Section 3.14. While employees at the Project Site could use nearby parks, including Beverly Gardens Park located immediately north of Santa Monica Boulevard and the Project Site, Beverly Hills Community Dog Park located 0.2 mile northeast of the Project Site, and Rexford Mini Park located 0.7 mile southwest of the Project Site, they would be expected to primarily use parks near to their place of residence. Additionally, employees would have access to on-site open space amenities, such as publicly accessible walkways, ground level courtyards, and private balconies and patios, included as part of the Project, thereby potentially reducing the demand for and use of nearby public parks and recreational facilities. For these reasons, development of the Proposed Project would not result in substantial deterioration of existing parks or recreational facilities, and impacts would be less than significant. This issue will not be further analyzed in the EIR.

- b) ***Does the Project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?***

**Less Than Significant Impact.** The Proposed Project would include landscaped and outdoor areas that could be used by employees, including terraces and garden areas that would be situated between the office buildings. All such facilities associated with the Proposed Project would be developed on site and are being evaluated as part of the Proposed Project. The Proposed Project does not include any new

recreational facilities or require the construction of new recreational facilities. As such, impacts would be less than significant, and this issue will not be further analyzed in the EIR.

## References

None.

## 3.17 Transportation

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in inadequate emergency access?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the Project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?***

**Potentially Significant Impact.** The Proposed Project includes the construction and operation of up to 11 new office buildings on a site that is currently vacant. Project-generated traffic during construction would include worker-related commuter trips, trucks used for delivering construction equipment, and trucks used for delivering and hauling construction materials and wastes. Project-generated traffic during operation would include employee-related vehicle trips and vehicle trips associated with loading/delivery trucks. The trips generated as a result of the Proposed Project have the potential to conflict with City policies for the circulation system. As such, a transportation study will be prepared as part of the EIR and will include an analysis of potential conflicts with applicable plans and policies addressing the circulation system. Therefore, this issue will be further analyzed in the EIR.

- b) ***Would the Project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?***

**Potentially Significant Impact.** CEQA Guidelines Section 15064.3 establishes vehicle miles traveled (VMT) as the most appropriate measure of transportation impacts, facilitating a shift from the use of level of service (LOS) to evaluate the impacts of traffic and transportation on the environment. VMT is the amount



and distance of automobile travel attributable to a project, while LOS is a measure of intersection and roadway operations based on vehicle delay and congestion. CEQA Guidelines Section 15064.3(b) describes specific considerations for evaluating the transportation impacts for several categories of development and is divided into subsections addressing land use projects, transportation projects, and projects warranting qualitative traffic analysis. For land use projects, Section 15064.3(b) states that “VMT exceeding an applicable threshold of significance may indicate a significant impact.” Additionally, in October 2019, the City adopted their own local CEQA thresholds of significance for transportation impacts and local transportation assessment guidelines, pursuant to Planning Commission Resolution No. 1901 (City of Beverly Hills 2019). Further studies are required to determine whether the Project may result in VMT that exceeds the City’s local thresholds as established by Planning Commission Resolution No. 1901. The EIR will contain a Transportation Impact Report for the Project that includes an impact analysis based on VMT. As such, this issue will be further analyzed in the EIR.

- c) ***Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?***

**Potentially Significant Impact.** The Proposed Project involves new ingress/egress locations for the underground parking garage along Civic Center Drive, as well as loading spaces along Civic Center Drive. As such, the Proposed Project would introduce new circulation patterns to the Project area and would create new internal circulation patterns. The Proposed Project would also increase pedestrian activity in the area, as well as modify existing pedestrian circulation. These additions and modifications include the removal of a pedestrian island at the intersection of Civic Center Drive and Beverly Boulevard, the addition of a mid-block crossing of Civic Center Drive and the addition of a new pedestrian crossing in the western portion of the site crossing Civic Center Drive. The EIR will thus include an analysis of Project Site vehicular and pedestrian access, including additional pedestrian activities and modifications of pedestrian connections at and in the vicinity of the Project Site. As such, this issue will be further analyzed in the EIR.

- d) ***Would the Project result in inadequate emergency access?***

**Potentially Significant Impact.** During construction, additional truck activity in the area may have the potential to affect emergency access. During Project construction, improvements below and within Civic Center Drive would be required, thereby potentially affecting access to the police station located across the street from the Project Site. However, while small portions of Civic Center Drive would be closed for a short duration during construction, two-way vehicular traffic flow would be maintained along Civic Center Drive throughout construction. Nonetheless, the Proposed Project would involve new driveways and vehicular patterns near the Project Site, which is located immediately across the street from the BHPD station. Therefore, Project construction and operation could also affect emergency access locally during construction and permanently based on proposed roadway modifications in the area. The EIR will thus include further details and analysis regarding emergency access during construction and operation. As such, this issue will be further analyzed in the EIR.

## References

City of Beverly Hills. 2019. *Resolution 1901 – A Resolution of the Planning Commission of Beverly Hills Adopting Local California Environmental Quality Act (CEQA) Thresholds of Significance for Transportation Impacts and Adopting Local Transportation Assessment Guidelines*. Accessed December 2, 2020.  
<https://www.beverlyhills.org/cbhfiles/storage/files/4460592531431926648/RFP-20-270-2-ATTACHMENTCITY'SCEQATHRESHOLDS.pdf>.

## 3.18 Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Would the Project 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:				
i. 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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

a) *Would the Project 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:*

i) *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)?*

**Potentially Significant Impact.** The Project would involve ground-disturbing activities that could have the potential to disturb tribal cultural resources, in the event that any are present within areas of ground disturbance. A record search of the Native American Heritage Commission (NAHC) Sacred Lands File was completed in October 2020, the results of which were negative. However, at the

request of the NAHC, outreach to local tribes is currently being undertaken by the City. These tribes include the Fernandeno Tataviam Band of Mission Indians, the Gabrieleno Band of Mission Indians – Kizh Nation, the Gabrieleno/Tongva San Gabriel Band of Mission Indians, the Gabrieleno/Tongva Nation, the Gabrieleno Tongva Indians of California Tribal Council, the Gabrieleno-Tongva Tribe, the Santa Rosa Band of Cahuilla Indians, and the Soboba Band of Luiseno Indians. If any issues related to tribal cultural resources are identified as a result of the City's ongoing outreach activities, this issue will be further discussed in the EIR. If no tribal cultural resources are identified, no further analysis will be required.

- ii) ***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?***

**Potentially Significant Impact.** See the discussion in Section 3.18(a)(i).

## References

None.

## 3.19 Utilities and Service Systems

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the Project:				
a) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) 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?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) ***Would the Project 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?***

**Potentially Significant Impact.** The Proposed Project would include installation of new utility connections, so that the proposed office buildings would be served by the City's existing utility infrastructure. This would involve installing connections to existing water lines and sewer lines within Civic Center Drive, installing stormwater drainage infrastructure within the Project Site that connects to existing infrastructure within the surrounding roadways, and installing connections to existing electrical, gas, and telecommunications lines. These utility improvements are expected to occur within the Project Site and along the Project Site's immediate street frontages and would involve trenching within Civic Center Drive. These improvements are considered part of the Project's construction activities. As such, the construction effects of installing these improvements are evaluated in the construction analysis within this Initial Study. As described throughout this Initial Study, some construction-related effects (e.g., air quality, noise, and transportation) require further analysis in the EIR. Thus, potential effects of utility improvements will be further evaluated as part of the construction analysis in the EIR.

As stated in Section 2.1, there are existing utility lines within and adjacent to the Project Site. These existing lines would be protected in place during construction or relocated if necessary. Any relocations would be accommodated within the Project footprint and would not involve additional areas of construction or excavation beyond what will be analyzed as part of the Proposed Project's construction scenario. As described throughout this Initial Study, some construction-related effects (e.g., air quality, noise, and transportation) require further analysis in the EIR. Thus, potential effects of utility relocations will be further evaluated as part of the construction analysis in the EIR.

The Proposed Project would represent an intensification of use on the Project Site compared to existing conditions. Project operation would increase consumption of water, natural gas, and electricity and would increase on-site wastewater generation. It is currently unknown whether existing facilities can accommodate the increases in demand that would be associated with the Proposed Project. The EIR will present an analysis of the Project's utility demands and will compare these demands to the capacities of existing facilities. As such, the Project's potential need for new or expanded facilities will be further analyzed in the EIR.

- b) *Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

**Potentially Significant Impact.** The Proposed Project would introduce office uses to a currently vacant site, which would generate an increase in on-site water use. The EIR will include an evaluation of whether or not the Project water demands are anticipated and accounted for within the adopted Urban Water Management Plan. As such, further analysis will be presented in the EIR to determine the sufficiency of existing water supplies relative to anticipated Project demands. Therefore, this issue will be further analyzed in the EIR.

- c) *Would the Project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

**Potentially Significant Impact.** Because the Proposed Project would introduce office uses to a currently vacant site, Project operation would increase on-site wastewater generation. Further analysis will be presented in the EIR to determine the sufficiency of existing wastewater treatment facilities, and more specifically, Hyperion Water Reclamation Plant, relative to anticipated Project demands. As such, this issue will be further analyzed in the EIR.

- d) *Would the Project 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?*

**Potentially Significant Impact.** The Proposed Project would introduce office uses to a currently vacant site, which would increase solid waste generation compared to existing conditions during both construction and operation. While Project construction and operation would not be expected to generate sufficient solid waste such that regional landfill capacity would be impacted, the EIR will study the Proposed Project's anticipated solid waste generation during both construction and operation relative to landfill capacity and its consistency with applicable solid waste reduction standards and goals.

- e) *Would the Project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

**Potentially Significant Impact.** As stated above, the EIR will evaluate the Proposed Project's consistency with applicable solid waste reduction standards and goals.

## References

None.

## 3.20 Wildfire

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

a) **Would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?**

**Less Than Significant Impact.** The Proposed Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are not located within a state responsibility area. The nearest state responsibility area is located approximately 10 miles west of the Project Site, in the Santa Monica Mountains. As described in Section 3.9(g), the Project Site, as well as Parcel 13 and the Triangle, are also not within a VHFHSZ. The nearest VHFHSZ is located approximately 0.6 miles north of the Project Site, as well as Parcel 13 and the Triangle, at its closest point. Within the City, this zone is located north of Sunset Boulevard and generally coincides with the foothills of the Santa Monica Mountains. As such, the Project Site, as well as Parcel 13 and the Triangle, are not within a VHFHSZ but are located relatively near a VHFHSZ (CAL FIRE 2020). Due to the Project's proximity to a VHFHSZ, the wildfire impact thresholds are discussed below.

The City has developed two plans designed to implement programs to facilitate emergency management: the EOP and the HMAP. The EOP focus on potential large-scale disasters that can generate unique situations requiring unusual emergency responses. The plan provides an overview of operational concepts, identifies components of the City's Emergency Management Organization within the Standardized Emergency Management System and the National Incident Management System, and describes the overall responsibilities of federal, state, and local agencies for protecting life and property and ensuring the overall

well-being of the population. The HMAP includes resources and information to assist City departments, residents, the public, private sector organizations, and others interested in participating in planning for hazards. The HMAP provides a list of activities that may assist the City in reducing risk and preventing loss from future hazard events. The strategies address multi-hazard issues, as well as activities for earthquakes, wildfires, terrorism, earth movements, flooding, and wind storms (City of Beverly Hills 2010). The Proposed Project's design and operations, as well as the future occupants of the Project, would be required to comply with applicable aspects of the EOP and the HMAP. The Proposed Project would not obstruct or interfere with implementation of the plans. Rather, the plans would proceed with or without the Project.

The Los Angeles County Department of Public Works identifies evacuation routes throughout the County. Santa Monica Boulevard and Beverly Boulevard, which both border the Project Site, are designated County disaster routes (LADPW 2008). Construction activities can obstruct roadways and/or slow traffic on roadways. However, construction trucks associated with the Project would enter and exit the Project Site via Civic Center Drive. Construction staging that requires roadway encroachments (e.g., concrete pumping) would be conducted from Civic Center Drive. As such, Proposed Project construction is not expected to reduce the capacity of Santa Monica Boulevard or Beverly Boulevard. Construction disturbances would be limited to additional truck traffic along these roadways. Construction truck traffic is not unusual in an urban environment, and truck traffic would be controlled via standard construction best management practices, which include construction traffic control measures. Furthermore, in the event of an evacuation, it is likely that construction at the Project Site would cease. The evacuation would proceed in a similar manner with or without the Project. As such, Project construction is not expected to impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

During operations, the Project would increase the number of people present on the Project Site relative to existing conditions. The Project would therefore result in an incremental increase in the number of people who would need to evacuate and/or receive emergency services, particularly during business hours. However, as explained in Section 3.14, the employment growth associated with the Project would fall well within projections for the City, is not substantial, and has been accounted for in local and regional planning efforts. As such, the additional employees associated with the Project would not substantially alter the proceedings of the City's emergency response plan or evacuation plan. Furthermore, the Project's egress is onto Civic Center Drive, and no driveways would be situated along Santa Monica Boulevard or Beverly Boulevard. This would minimize the Project's effects on designated emergency evacuation routes (Santa Monica Boulevard or Beverly Boulevard) in the event of an evacuation. Employees of the Project would exit onto Civic Center Drive and could then evacuate in a southerly direction along Beverly Boulevard, Foothill Road, or Civic Center Drive. As such, the Proposed Project is not expected to substantially interfere with or obstruct evacuations from the VHFHSZ north of the Project Site.

Furthermore, the Proposed Project would not introduce any physical obstructions or impairments to emergency response or evacuation. During Project construction, improvements below and within Civic Center Drive would be required, thereby potentially affecting access to the police station located across the street from the Project Site. However, while small portions of Civic Center Drive would be closed for a short duration during construction, two-way vehicular traffic flow would be maintained along Civic Center Drive throughout construction, thereby ensuring that vehicles traveling to and from the police station via Civic Center Drive would still have access. The Beverly Hills Fire Department would review the Proposed Project plans to ensure adequate emergency access in and around the site. The plans would be adjusted in the event that the fire department identifies any deficiencies in access that could preclude emergency evacuation or emergency response. In the event of a wildfire disaster during Project operation, the City's

emergency plan would proceed in a similar fashion with or without the Proposed Project. Impacts would be less than significant, and this issue will not be further analyzed in the EIR.

- b) ***Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?***

**No Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are not located within a VHFHSZ and are approximately 0.6 miles south of the nearest VHFHSZ (CAL FIRE 2020). The Project Site, Parcel 13, and the Triangle are located within an urbanized setting, surrounded by roadways, commercial development, and residential development. The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are all relatively flat and are not adjacent to any slopes or wildland areas such that Project construction or operation would have the potential to exacerbate wildfire risks relative to existing conditions. Construction activities within an urbanized setting are common throughout the Los Angeles metropolitan area and do not present a unique or substantial wildfire risk. Furthermore, the Project Site, as well as Parcel 13 and the Triangle, are separated from wildland areas by a major four-lane roadway (North Santa Monica Boulevard) and by residential development and roadways in a gently sloping area. These urban features separate the Project Site, as well as Parcel 13 and the Triangle, from the VHFHSZ located north of Sunset Boulevard. Therefore, it is not anticipated that the Proposed Project, due to slope, prevailing winds, and other factors, would exacerbate wildfire risks or expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impact would occur, and this issue will not be further analyzed in the EIR.

- c) ***Would the Project 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?***

**No Impact.** The Proposed Project would not require the installation or maintenance of new roads, fuel breaks, emergency water sources, power lines, or other utilities such that fire risk would be exacerbated. No impact would occur, and this issue will not be further analyzed in the EIR.

- d) ***Would the Project 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?***

**No Impact.** The Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are all relatively flat and are not adjacent to any slopes or wildland areas such that Project construction or operation would have the potential to 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. The Project Site, as well as Parcel 13 and the Triangle, are not located within a landslide hazard area (CGS 2020). The Project Site, as well as Parcel 13 and the Triangle, are separated from landslide hazard areas by a major four-lane roadway (North Santa Monica Boulevard) and by residential development and roadways in a gently sloping area between North Santa Monica Boulevard and the VHFHSZ north of Sunset Boulevard. Furthermore, the Proposed Project would not involve substantial drainage changes on the Project Site such that flooding would be caused or exacerbated by the Project (see Section 3.10 for further details). No impact would occur, and this issue will not be further analyzed in the EIR.



## References

- CAL FIRE (California Department of Forestry and Fire Protection). 2020. "FHSZ Viewer." Accessed September 27, 2020. <http://egis.fire.ca.gov/FHSZ/>.
- CGS (California Geologic Survey). EQ Zapp: California Earthquake Hazards Zone Application. Web mapping application. Accessed September 28, 2020. <https://maps.conservation.ca.gov/cgs/EQZApp/app/>.
- City of Beverly Hills. 2010. *City of Beverly Hills General Plan*. April 30, 2010. Accessed September 26, 2020. <http://www.beverlyhills.org/departments/communitydevelopment/longrangeplanning/generalplan/generalplandocument/>.
- LADPW (Los Angeles Department of Public Works). 2008. *Disaster Route Maps (By City), City of Beverly Hills*. Accessed September 28, 2020. <http://pw.lacounty.gov/dsg/disasterRoutes/city.cfm>.

### 3.21 Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- a) ***Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?***

**Potentially Significant Impact.** As discussed in Section 3.4, the Project Site, as well as the Public Benefit component of the Proposed Project (Parcel 13 and the Triangle), are located in a developed and urbanized area and do not support sensitive vegetation, sensitive wildlife species, or sensitive habitat. The Project Site, as well as Parcel 13 and the Triangle, are situated along North Santa Monica Boulevard and are in a developed area characterized by vehicle traffic, urban noise, and activity. The Proposed Project would involve ground disturbance and development on the Project Site, which is currently vacant and supports ornamental vegetation. Due to the existing conditions of the Project Site and surrounding area, as well as the absence of suitable habitat on these properties, the Proposed Project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. However, the Project area contains vegetation that has the

potential to support nesting birds and raptors which are protected under the California Fish and Game Code and under the federal Migratory Bird Treaty Act. In the event that any nesting birds or raptors are present during construction activities, the birds and/or raptors would be protected in accordance with the condition of approval set forth in Section 3.4(a), which would require a pre-construction nesting bird and raptor survey to be completed if construction is initiated during the nesting season. In accordance with this condition of approval, any nesting birds or raptors that are discovered within or near the Project Site would be avoided. Impacts to biological resources resulting from the Proposed Project would therefore be less than significant. This issue will not be further analyzed in the EIR.

However, further cultural resource investigations are required and will be presented in the EIR to determine any potential impacts that the Proposed Project would have on important examples of the major periods of California history or prehistory. Therefore, effects to cultural resources would be further examined in the EIR.

- b) ***Does the Project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?***

**Potentially Significant Impact.** As described throughout this Initial Study, the Proposed Project has the potential to result in a variety of potentially significant impacts requiring further analysis in the EIR. It is also anticipated that the Proposed Project may be developed while other Projects in the area are being developed, and the incremental effects of this Project may be cumulatively considerable. Therefore, potential cumulative impacts resulting from Project construction or operations have the potential to be significant and will be further analyzed in the EIR.

- c) ***Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?***

**Potentially Significant Impact.** As detailed throughout this Initial Study, the Proposed Project could result in a variety of significant effects, some of which have the potential to affect human beings. As such, further analysis will be provided in the EIR.

## References

None.

# 4 Preparers

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