

Appendix 11

Revised Project Analysis (September 2018 Revised Project)



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9908 South Santa Monica Boulevard
Condominium Project EIR

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REVISED PROJECT ANALYSIS (SEPTEMBER 2018 REVISED PROJECT)

This document is the Revised Project Analysis for the 9908 South Santa Monica Boulevard Condominium Project, proposed in the City of Beverly Hills. The purpose of this document is to evaluate the Revised Project, as proposed in September 2018 (hereafter, the “September 2018 Revised Project”), and compare its impacts to those of the original Proposed Project analyzed in the Final Environmental Impact Report (FEIR). The following analysis considers potential impacts associated with the September 2018 Revised Project related to aesthetics, air quality, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise and vibration, and transportation and traffic. The September 2018 Revised Project is a separate project than the project proposed in July 2018 (hereafter, the “July 2018 Revised Project”), which is analyzed in Appendix 9 of the FEIR.

Final EIR Section 6, *Alternatives*, examines a range of reasonable alternatives to the Proposed Project that would attain most of the basic Project objectives, but would avoid or substantially lessen any of the potentially significant impacts identified in the FEIR. In addition to Section 6, *Alternatives*, Appendix 10 to the FEIR includes a more detailed evaluation of Alternative 3, *Mixed Use Office and Commercial Alternative*, in comparison to the original Proposed Project. However, based on comments provided for the Draft EIR by the public and the City’s Planning Commission, the September 2018 Revised Project was created to provide a project, similar to Alternative 2 in Section 6, *Alternatives*, that would better align with the existing General Plan and zoning designations of the site and surrounding area, as well as meet most of the basic Project objectives. As discussed in Section 2, *Project Description*, the objectives for the Proposed Project are as follows:

- *Redevelop a currently vacant urban in-fill site into a luxury residential project that is compatible with adjoining residential development and adjoining luxury hotel, office and service businesses.*
- *Enhance and activate a currently vacant site in an underutilized area of the city with limited parking, limited circulation, and adjacent sensitive residential uses by bringing high end 24-hour residential use to the site.*
- *Support infill development in an existing urban area in a manner which minimizes traffic impacts.*
- *Enhance housing opportunities in the city, bring new residents to the area, and provide an opportunity for downsizing Beverly Hills residents to remain in the city.*
- *Create luxury medium density urban housing with ample landscaped setbacks, spacious living areas, high ceilings, private outdoor open space and luxury roof top amenities*
- *Improve the aesthetic quality of the site by creating a first class architectural building to replace vacant land.*
- *Create construction jobs and increase housing opportunities in the city.*
- *Improve public safety by bringing 24-hour residents and residential activity to an underutilized area of the City.*
- *Increase activity and customer base for surrounding commercial businesses by bringing residents to the area.*



Table 1 provides a summary comparison of the development characteristics of the originally Proposed Project, July 2018 Revised Project, and the September 2018 Revised Project. As shown in Table 1, the September 2018 Revised Project is similar to the July 2018 Revised Project minus buildout of a fifth story. A detailed description of the September 2018 Revised Project and an analysis of its impacts follow.

**Table 1
 Comparison of the Proposed Project, July 2018 Revised Project, and
 September 2018 Revised Project's Buildout Characteristics**

Characteristic	Proposed Project	July 2018 Revised Project	September 2018 Revised Project
On-Site Uses			
Residential Units	27	27	25
Total Bedroom Count	57	73	63
Residential SF	89,988	86,182	76,969
Commercial SF	-	13,036	13,036
Floor Area Ratio (FAR)	2.50	2.76	2.5
Parking Spaces	74 spaces	176 spaces	176 spaces
Building Levels and Height			
Parking Levels	1	3	3
Parking Level SF	36,002	95,834	95,834
Building Levels	5	5	4
Building Height	66 ¹ feet	58 ² feet	47 ² feet
Floor Area by Level³			
Parking Level 3 SF	-	0	0
Parking Level 2 SF	-	0	0
Parking Level 1 SF	3,237	0	0
Level 1 SF	18,974	22,342	22,342
Level 2 SF	18,531	22,253	22,253
Level 3 SF	19,352	21,763	21,763
Level 4 SF	19,352	21,034	21,034
Level 5 SF	10,135	10,332	-
Roof SF	407	1,494	2,613
Overall SF	89,988	99,218	90,005



**Table 1
 Comparison of the Proposed Project, July 2018 Revised Project, and
 September 2018 Revised Project’s Buildout Characteristics**

Characteristic	Proposed Project	July 2018 Revised Project	September 2018 Revised Project
Construction			
Grading/ Soil Export CY	20,500	45,000	45,000

SF = square feet, CY = cubic yards

¹ *Based on the text of the overlay zone for the originally Proposed Project, the height of the building was measured to the pool deck surface.*

² *Based on the text of the overlay zone for the July 2018 Revised Project and September 2018 Revised Project, height is proposed to be measured to building roof surface, not pool deck surface.*

³ *Based on the BHMC Floor Area definition, below grade parking areas are not considered when determining a building’s total floor area. The below grade areas that are included in floor area calculations are identified as floor area in this table.*

September 2018 Revised Project Description

The September 2018 Revised Project would involve a mixed-use building that would include commercial and residential land uses on a 36,002 square-foot site located at 9908 South Santa Monica Boulevard in the City of Beverly Hills. The building would be four stories tall with a total height of 47 feet, measured from the project’s datum point. The September 2018 Revised Project would replace the undeveloped Project site with 76,969 square feet of residential space consisting of 25 residential units ranging from one to four bedrooms. In addition, the September 2018 Revised Project would include approximately 13,036 square feet of retail/commercial space on the ground floor for a total of 90,005 square feet of floor area. The retail/commercial space would consist of 9,345 square feet¹ of retail use, and 3,691 square feet² of restaurant (dining plus bar) use.

The September 2018 Revised Project would include three levels of subterranean parking and provide 176 parking spaces for residents and visitors, consisting of 137 standard spaces, 20 tandem spaces, 2 compact spaces, 8 EV charging station spaces, 7 ADA spaces, and 2 EV charging ADA spaces. The addition of a second and third level of parking would eliminate the use of mechanical lifts that are included as part of the Proposed Project. The additional parking spaces compared to the original Proposed Project would require a second and third level of subterranean parking, which would extend the excavation period by approximately five months, for a total period of 26 months, in comparison to the Proposed Project (development of the originally Proposed Project was expected to occur over approximately 21 months). Access to the Project site would be provided at two locations (each with one inbound and one outbound direction of travel): a residential motor court located on Charleville Boulevard (the motor court entry is from Charleville Boulevard and the exit is onto the alley south of the project site) and a commercial driveway located on South Santa Monica Boulevard. In addition, the September 2018 Revised Project would include a loading dock area for commercial vans and deliveries along the southeastern boundary of the Project site via a one-way eastbound City alley with access from South Moreno Drive.

¹ Retail square footage consists of 7,255 square feet of retail use and 1,978 square feet of “back of house” (BOH), which typically includes the offices, storage rooms, and any other areas hidden from customers.

² Restaurant square footage consists of 1,912 square feet of restaurant use and 1,892 square feet of BOH, which typically includes the kitchen, offices, storage rooms, and any other areas hidden from guests.



Project entitlements for the September 2018 Revised Project remain the same as for the Proposed Project, namely a request for amendments to the General Plan and the Zoning Code (Zone Text Amendment and Zoning Map Amendment) to create a Mixed Use Planned Development Overlay Zone (M-PD-5) and apply it to the Project site, a Planned Development Permit, a Vesting Tentative Tract Map for condominium purposes, and a Development Agreement.

Recent Geological Findings

In April 2016, the Initial Study for the original Proposed Project was released to the public, along with the Notice of Preparation of an EIR (available in Appendix 1). Based on the geologic information available at that time, in Section VI, Geology and Soils, of the Initial Study, it was determined that potential geologic impacts would be less than significant. However, in 2018, the California Geological Survey (CGS) published a final map of the Santa Monica Fault Alquist-Priolo zone, and extended the Santa Monica fault zone an additional mile to the east across the City of Beverly Hills. Responsive to the new mapping information published by the State, on April 6, 2018, Earth Consultants International (ECI) submitted a Report on a Fault Hazard Investigation for the Project site (9900 to 9916 South Santa Monica Boulevard) to the City that summarized the results of a fault trenching investigation of the property. The Fault Hazard Investigation report is included as Attachment A to Appendix 9. The ECI report identifies that the 9900-9916 South Santa Monica site lies near the mapped intersection of three major fault zones: the West Beverly Hills Lineament of the Newport-Inglewood fault zone, the western end of the Hollywood fault zone, and the eastern end of the Santa Monica fault zone. Initially, only the Hollywood and Newport-Inglewood faults were zoned as “Active” under the Alquist-Priolo Earthquake Fault Zoning Act by the CGS, meaning that the faults have ruptured through to the ground surface in the last approximate 11,700 years. The purpose of the fault trenching investigation conducted by ECI was to evaluate the surface rupture hazard on the 9900-9916 South Santa Monica Boulevard property due to the faults mapped in the immediately surrounding area (see Figure 2 in Attachment A to Appendix 9).

According to ECI, based upon available regional fault maps and recent mapping of faults on adjacent properties, no faults were interpreted to cross the Project site, but some faults were interpreted to be as close as 200 feet. In addition, the topography and geomorphology also provided no indications of an active fault across the property. ECI completed a physical investigation to verify if any faults were located on the Project site. A trench was excavated diagonally (northeast trending) across the site to intercept any faults that may cross the property. ECI identified several packages of alluvial deposits that were continuous across the length of the trench. Based on soils developed in these deposits, the lowermost mudflow deposits exposed in the trench are at a minimum 18,800 years old, but most likely are closer to 60,000 years old. The alluvial sediments at the bottom of the trench are even older. However, most importantly, no faulting or abrupt breaks in the deposits were observed within the trench exposure; nor were any suspicious thickness changes or tilted units observed that might suggest fault deformation. Given the most conservative estimate for the age of the units, and their stratigraphic continuity, ECI documented that there are no active (<11,700 years old) faults across the property. No fractures were present in the deposits at either end of the observable exposures, nor anywhere else in the trenches, to indicate a fault in immediate proximity to the property lines. Based on these findings, ECI concluded that there is no hazard for surface fault rupture across the property. Overall, ECI did not find any development constraints posed by fault hazards other than the normal seismic considerations that are part of the structural and



geotechnical engineering design of all projects (ECI 2018). Therefore, this report reaffirms the conclusions presented in the April 2016 Initial Study for the originally Proposed Project.

Impact Analysis

As shown in Table 1, the September 2018 Revised Project is similar to the July 2018 Revised Project minus buildout of a fifth story, which would incrementally decrease the overall floor area of the building from 99,218 square feet to 90,005 square feet. Due to the similarity in project characteristics between the September 2018 Revised Project and the July 2018 Revised Project, the following impact analysis provides a qualitative discussion of the impacts associated with the September 2018 Revised Project as compared to the July 2018 Revised Project. See Appendix 9 of the FEIR for a quantitative analysis of air quality, greenhouse gases, and noise and vibration impacts associated with the July 2018 Revised Project.

a. Aesthetics. The September 2018 Revised Project would be constructed on the same 36,002 square-foot vacant site as the Proposed Project. The Project site is located in an urban built environment and surrounded by one- to four-story buildings. There are no City landmarks, hillside vistas or notable urban views from public spaces through the Project site. Therefore, similar to the Proposed Project, the September 2018 Revised Project would not conflict with General Plan Policy OS 6.1, Protection of Scenic Views, which calls for protection of “scenic views and vistas from public places including City landmarks, hillside vistas, and urban views of the City.”

Under the September 2018 Revised Project, 13,036 square feet of retail/commercial uses would be added at the Project site, which would create a different visual character than the Proposed Project. All commercial uses would be located on the first floor and would replace the residential first floor associated with the Proposed Project. Commercial development would be visible at the building’s frontage along South Santa Monica Boulevard and would reduce the building’s setbacks from South Santa Monica Boulevard and would eliminate the ground-floor landscaped areas, amenity gardens, and private gardens that would be included under the originally Proposed Project. Despite the implementation of commercial uses and reduced setbacks on the ground floor, the September 2018 Revised Project would not result in a reduction in the number of ornamental tree locations along the South Santa Monica Boulevard or Charleville Boulevard public right of way when compared to the Proposed Project. Although the Proposed Project would involve removal, replacement and relocation of four ornamental trees along South Santa Monica Boulevard and Charleville Boulevard, these trees are not protected as native or heritage trees or as an urban grove by Article 29 of the Beverly Hills Municipal Code (BHMC) as the trees are not located on private property. The type and location of all replacement trees will be subject to review and approval by the City’s urban forester and shall be installed prior to Certificate of Occupancy for the new building. Therefore, the September 2018 Revised Project would comply with General Plan Policy OS 3.1 (Street Tree Master Plan), which discusses continued implementation of the phases of the Street Tree Master Plan and identifies that voluntary private funding to cover the cost of purchasing and planting street trees is desired. Overall, the September 2018 Revised Project’s incorporation of ground floor commercial uses with upper floor residential units would be compatible with the visual character of the surrounding one-to-four story land uses, including the Beverly Hills Community Sports Center to the west; commercial retail, offices, and The Peninsula Hotel



across Charleville Boulevard to the east; and multi-family residential and parking garages to the south.

Similar to the Proposed Project and the July 2018 Revised Project, the September 2018 Revised Project would create new sources of light and glare that would be more intense than under existing conditions since the site is vacant. Of the surrounding land uses, the multi-family residences south of the Project site would be most affected by potential light and glare. However, BHM Section 5-6-1101 prohibits any lighting which creates an intensity of light on residential property that is greater than one foot-candle (defined as the illuminance on a one-square foot surface from a uniform source of light) above the ambient light level (Beverly Hills 2015). Because the September 2018 Revised Project would involve development of a 47-foot, four-story building instead of a 58-foot, five-story building, overall light and glare under this project would be incrementally less than light and glare generated by the Proposed Project and July 2018 Revised Project. In addition, as with the Proposed Project and July 2018 Revised Project, the September 2018 Revised Project would also comply with City's General Plan Open Space Element Policies 6.6, Lighting, and 6.7, Glare, (Beverly Hills 2010):

- **OS 6.6 Lighting.** *Minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary.*
- **OS 6.7 Glare.** *Require that new development avoid the creation of incompatible glare through use of appropriate materials and design features.*

Although the September 2018 Revised Project would include 13,036 square feet of ground floor commercial development, which would potentially generate more light due to signage and window displays, the proposed commercial uses would be oriented toward South Santa Monica Boulevard and Charleville Boulevard. As such, the lighting associated with the commercial uses would not spill over onto the adjacent residential neighborhood behind to the Project site. In addition, required compliance with the BHM and Beverly Hills General Plan would result in less than significant impacts associated with new sources of light and glare.

Both the Proposed Project and July 2018 Revised Project would involve construction of a five-story building on the Project site with roof heights of 61 feet and 58 feet, respectively. However, the height of the building would be reduced by one story under the September 2018 Revised Project. When compared to the heights of the originally Proposed Project and the July 2018 Revised Project, the September 2018 Revised Project would have a maximum height of 47 feet (see Table 1). Due to this decrease in overall building height, the 2018 Revised Project would generate less shadow effect on nearby light-sensitive uses as compared to the Proposed Project and the July 2018 Revised Project. The only shade-sensitive use in the project vicinity is the rooftop open space area, including a pool, on the Peninsula Hotel located 50 feet east of the Project site. As shown in Figure 1, Figure 2a, and Figure 2b³ of Appendix 9, the July 2018 Revised Project's shadows would not be cast onto the Peninsula Hotel rooftop open space area for a significant amount of time during the summer or winter months. Because the September

³ Figures 1, 2a and 2b for the shade and shadow analysis in Appendix 9 have been revised to include the height and massing of the existing Peninsula Hotel and surrounding buildings. These revised diagrams provide a more detailed analysis than originally provided when Appendix 9 was reviewed by the Planning Commission on August 8, 2018, which show that the July 2018 Revised Project would not generate significant shadows during the summer months and shadows during the winter months would occur on the Peninsula Hotel rooftop between 3:30 PM and 4:00 PM that would result in approximately one hour of shadows before the sun sets at approximately 4:48 PM.



2018 Revised Project would develop a four-story building instead of a five-story building in comparison to the July 2018 Revised Project, shadows generated by the September 2018 Revised Project would not be cast on the Peninsula Hotel rooftop for any of the time periods studied to evaluate an impact based on the identified CEQA threshold. Furthermore, the 47' tall September 2018 Revised Project would only be approximately two feet taller than the Peninsula Hotel thus any shading of the Peninsula rooftop is very unlikely as the expanded shadow evaluation contained in Appendix 9 indicates that a 58' tall structure would shade the Peninsula rooftop for approximately one hour near dusk during winter conditions. Therefore, the shadow effects of the September 2018 Revised Project would not exceed impact thresholds (i.e., four hours between 9:00 AM and 5:00 PM during the summer, and three hours between 9:00 AM and 3:00 PM during the winter). Therefore, shadow impacts of the September 2018 Revised Project would be less in comparison to those of the Proposed Project and the July 2018 Revised Project and would remain less than significant.

Overall, development of the September 2018 Revised Project would generally improve the visual quality of the currently vacant site by providing new housing and reintroducing ground floor commercial use along South Santa Monica Boulevard. The ground floor commercial use would provide continuity to the commercial character of the Santa Monica Boulevard corridor frontage in comparison to the originally Proposed Project that included substantial setbacks and a motor court along South Santa Monica Boulevard. Therefore, similar to the July 2018 Revised Project, the September 2018 Revised Project would generally be more aesthetically compatible with the character of the surrounding community than the Proposed Project. In addition, due to the removal of the fifth story from the building, the September 2018 Revised Project would generate incrementally less light, glare, and shadow impacts than those of the Proposed Project and the July 2018 Revised Project. As with the Proposed Project and the July 2018 Revised Project, aesthetic impacts would be less than significant.

b. Air Quality. The September 2018 Revised Project would involve 25 new residential units (two less units in comparison to the originally Proposed Project and July 2018 Revised Project), and would marginally increase population in the City of Beverly Hills. According to the California Department of Finance [DOF], the City currently has an estimated population of 34,646 (California DOF 2017), which is within the Southern California Association of Governments (SCAG) 2020 population forecast of 35,800 for the City (SCAG 2016). Based on the City's average of 2.33 persons per household (California DOF 2017), the September 2018 Revised Project would add an estimated 58 residents (25 dwelling units x 2.33 people per dwelling unit). The 58 new residents would increase the City's population by 0.2 percent, which would not exceed SCAG's 2020 population forecast of 35,800. Therefore, the population growth associated with the September 2018 Revised Project would be consistent with City forecasts.

According to SCAG, the estimated housing forecast for the City is 15,500 in 2020 (SCAG 2016) and with approximately 16,432 housing units, the City's existing housing stock already exceeds the 2020 SCAG forecast. However, the 25 residential units associated with the September 2018 Revised Project would entail an incremental increase in the existing supply of housing units. Furthermore, the City's population would still be within SCAG's forecast despite the population growth generated by an increase in on-site residences.

The September 2018 Revised Project would also include 13,036 square feet of commercial space that would provide new job opportunities. The number of employees generated by the project is



estimated based on employment density numbers from SCAG's 2012 Employment Density Study Summary Report, which estimates one employee per 730 square feet of retail space (SCAG 2012). Based on this factor, the 13,036 square feet of commercial/retail space would generate approximately 18 employees. According to SCAG, the estimated employment forecast for the City is 63,100 in 2020, which is an increase in 2,953 employees from the 60,147 employees in 2015 (SCAG 2017). Because the September 2018 Revised Project would not be a major new employment center and is located in the Los Angeles metropolitan area, the Project would largely draw upon employees already living in the Los Angeles region and the addition of 18 new employees would not cause a substantial growth in the City's employment in exceedance of the SCAG forecast. Therefore, the September 2018 Revised Project would not conflict with the South Coast Air Quality Management District (SCAQMD) Air Quality Management Plan (AQMP).

Similar to the July 2018 Revised Project, overall temporary construction associated with the September 2018 Revised Project would include an estimated additional five months of construction activities required for the increased depth of the subterranean parking structure to accommodate three levels (a total of approximately 26 months from late 2018 to late 2020). As shown in Table 1, grading activities associated with construction of the September 2018 Revised Project would involve 45,000 CY of soil export for the three levels of subterranean parking, which is roughly double the 20,500 CY of soil export associated with the originally Proposed Project. Although construction of the September 2018 Revised Project would generate additional truck haul trips for soil transport, these trips would be spread out over a longer construction schedule, which would maintain daily construction emissions below thresholds. As shown in Table 3 of Appendix 9, maximum daily construction emissions associated with the July 2018 Revised Project would not exceed the SCAQMD regional thresholds or Localized Significance Thresholds (LSTs) for any criteria air pollutants. Because the September 2018 Revised Project would involve construction of four stories above ground instead of five stories, overall construction emissions under the September 2018 Revised Project would be incrementally less than those of the July 2018 Revised Project. Therefore, similar to the originally Proposed Project and the July 2018 Revised Project, construction of the September 2018 Revised Project would have a less than significant impact on regional and local air quality.

Similar to the originally Proposed Project, the September 2018 Revised Project would result in an increase in both stationary and mobile source emissions. Stationary source emissions would come from additional natural gas consumption and electrical demand by on-site buildings. Mobile source emissions would come from Project-related vehicle trips. As shown in Table 5 of Appendix 9, operational emissions associated with the July 2018 Revised Project would not exceed SCAQMD's operational thresholds. Because the September 2018 Revised Project would generate operational emissions associated with a four-story building instead of a five-story building, overall stationary and mobile source emissions would be incrementally less than those of the July 2018 Project. Therefore, similar to the Proposed Project and the July 2018 Revised Project, the September 2018 Revised Project's impacts related to operational emissions would be less than significant.

A CO hotspot could potentially occur near intersections where the Level of Service (LOS) changes to E or F, or where the volume to capacity ratio (V/C) increases by two percent or more as a result of the September 2018 Revised Project for intersections rated D or worse (SCAQMD 2003). However, as discussed in subsection g., *Transportation and Traffic*, implementation of the



September 2018 Revised Project would not cause a significant change to LOS at study intersections during one or more peak hours per the City's significance thresholds. Therefore, similar to the Proposed Project and the July 2018 Revised Project, the September 2018 Revised Project would not result in a CO hotspot and impacts would be less than significant.

c. Greenhouse Gas Emissions. Temporary construction-related greenhouse gas (GHG) emissions associated with the September 2018 Revised Project would be slightly greater than those of the Proposed Project due to the increased duration of excavation for the three levels of subterranean parking. Operational emissions would also be incrementally higher due to the addition of 13,036 square feet of retail/commercial uses. As shown in Table 8 of Appendix 9, combined GHG emissions associated construction and operation (i.e., area sources, energy use, solid waste generation, water use, and transportation) of the July 2018 Revised Project would not exceed the SCAQMD 3,000 MT tons per year significance threshold. Because the September 2018 Revised Project would involve construction and operation of a four-story building instead of a five-story building, overall combined annual construction and operational emissions under the September 2018 Revised Project would be incrementally less than those of the July 2018 Revised Project. Therefore, similar to the Proposed Project and the July 2018 Revised Project, the September 2018 Revised Project's impacts related to annual GHG emissions would be less than significant.

Similar to the Proposed Project and the July 2018 Revised Project, the September 2018 Revised Project would not conflict with applicable plans or policies related to GHG emissions since both entail infill development that would comply with applicable energy conservation requirements, implement proposed sustainability features, and generally be consistent with regional efforts to reduce regional vehicle miles traveled by providing housing and local-serving commercial amenities in an already urbanized area.

d. Hazards and Hazardous Materials. The Project site is not located in the vicinity of an airport or private airstrip. However, as discussed in Section 4.4, *Hazards and Hazardous Waste*, the Project site is located within a quarter mile of Beverly Hills High School (approximately 750 feet south of the site), Good Shepherd Catholic School (approximately 1,100 feet east of the site), and approximately a quarter mile southeast of El Rodeo School. However, similar to the Proposed Project and the July 2018 Revised Project, the September 2018 Revised Project would be required to comply with all applicable codes and regulations pertaining to emergency response and fire protection. In addition, based on the type of commercial uses that are permitted in the C-3 zone (refer to Table 4.5-1 in Section 4.5, *Land Use and Planning*), commercial uses on the Project site would not involve the routine transport, use, storage, or disposal of hazardous materials. As discussed in Section 4.4, *Hazards and Hazardous Waste*, the Phase I ESA conducted by California Environmental in June 2014 revealed no observable evidence of above ground storage tanks (ASTs); underground storage tanks (USTs); odors; pools of liquid; stains or corrosion; or other potential forms of soil contamination or hazardous substances in connection with the Project site. However, the Phase I ESA determined that USTs could be discovered during excavation for the subterranean parking levels. As part of the fault trenching investigation conducted by ECI (see Attachment A of Appendix 9) ECI completed a physical investigation to verify if any faults were located on the project site. A trench was excavated diagonally (northeast trending) across the site to intercept any faults that may cross the property which did not result in the finding of USTs. Nonetheless, as with the Proposed Project, if USTs were uncovered during grading, removal under permits issued by Los Angeles County



Department of Public Works and Beverly Hills Fire Department would be required to continue development of the September 2018 Revised Project. There would be no impact from observable soil contamination or hazardous substances on-site, and compliance with applicable regulations would reduce potential impacts related to previously undiscovered USTs to a less than significant level.

As discussed in Section 4.4, *Hazards and Hazardous Waste*, the nearest listed contaminated site is the Beverly Hilton, located approximately 200 feet north of the Project site. A release of fuel was reported in November 1998 at this off-site property. The Regional Water Quality Board (RWQCB) issued a No Further Action letter for the Beverly Hilton in March 2007. According to the 2014 Phase I ESA, it is unlikely that the groundwater beneath the site is impacted at concentrations that would lead to an on-site vapor intrusion condition at the proposed structure from the identified off-site facilities. Therefore, similar to the Proposed Project and the July 2018 Revised Project, impacts related to the presence of hazardous materials in the soil or groundwater beneath the Project site would be less than significant for the September 2018 Revised Project.

e. Land Use and Planning. Like the Proposed Project, the September 2018 Revised Project would require amendments to the Beverly Hills General Plan and the BHMC. The specific amendment is the creation of an overlay zone that allows for the height, density and uses included in the September 2018 Revised Project. The creation of an overlay zone is the same request as the Proposed Project; however, the Proposed Project proposed a strictly residential overlay zone named the Multiple Residential Overlay Zone (R-4-O). Instead, and similar to the July 2018 Revised Project, the September 2018 Revised Project would create a Mixed-Use Planned Development Overlay Zone (M-PD-5) to allow for the proposed mix of ground floor commercial with residential uses on the upper levels of the building. The proposed M-PD-5 Overlay Zone would include development standards and additional specific criteria to accommodate the September 2018 Revised Project, which would include standards for the proposed dwelling units, increased commercial use, height, increased floor area ratio, and increased parking, among other standards. The proposed M-PD-5 Overlay Zone, similar to the originally proposed R-4-O Overlay Zone, would require a Planned Development Permit, along with implementation of Mitigation Measures LU-1 and LU-2 to ensure compliance with the permit. However, the M-PD-5 Overlay Zone would not need to include standards for automatic car lifts under the September 2018 Revised Project when compared to the Proposed Project.

The commercial component of the September 2018 Revised Project would comply with the intended land uses under the General Plan, as well as the permitted land uses under the BHMC. In addition, the area surrounding the Project site along South Santa Monica Boulevard is a commercial corridor that includes commercial retail, offices, and The Peninsula Hotel. The addition of commercial uses on the ground floor under the 2018 Revised Project would contribute to this commercial corridor. Therefore, as with the July 2018 Revised Project, the September 2018 Revised Project would more closely align with the existing zoning and land uses in comparison to the Proposed Project.

The City's General Plan Land Use Element also contains the following goals and policies associated with commercial and residential uses and corridor development abutting residential neighborhoods within the City:



- **LU 2.1 City Places: Neighborhoods, Districts, and Corridors.** Maintain and enhance the character, distribution, built form, scale, and aesthetic qualities of the City's distinctive residential neighborhoods, business districts, corridors, and open spaces.
- **LU 2.4 Architectural and Site Design.** Require that new construction and renovation of existing buildings and properties exhibit a high level of excellence in site planning, architectural design, building materials, use of sustainable design and construction practices, landscaping, and amenities that contribute to the City's distinctive image and complement existing development.
- **LU 2.8 Pedestrian-Active Streets.** Require that buildings in business districts be oriented to, and actively engage the street through design features such as build-to lines, articulated and modulated facades, ground floor transparency such as large windows, and the limitation of parking entries directly on the street. Parking ingress and egress should be accessed from alleys where feasible.
- **LU 2.10 Development Transitions and Compatibility.** Require that sites and buildings be planned, located, and designed to assure functional and visual transitions between areas of differing uses and densities by addressing property and height setbacks, window and entry placement, lighting, landscape buffers, and service access.
- **LU 9.1 Uses for Diverse Customers.** Accommodate retail, office, entertainment, dining, hotel, and visitor-serving uses that support the needs of local residents, attract customers from the region, and provide a quality experience for national and international tourists.
- **LU 9.5 Commercial/ Residential Mixed Uses.** The feasibility of allowing mixed commercial/residential uses should be analyzed in order to expand the variety of housing types available and in certain areas, to improve commercial/ residential transitions.
- **LU 10.1 Local-Serving Business.** Promote appropriate development of businesses that serve, are located in proximity to, and are accessible to adjoining residential neighborhoods, such as grocery stores, dry cleaners, and personal care businesses.
- **LU 11.1 Preservation of Pedestrian-Oriented Retail Shopping Areas.** Preserve, protect and enhance the character of the pedestrian-oriented retail shopping area, which are typified by a variety of retail shops with displays to attract and hold the interest of pedestrian shoppers, to ensure the continuity of the pedestrian experiences.
- **LU 11.3 Retail Street Frontages.** Require that development and street frontages in districts containing retail uses be designed and developed to promote pedestrian activity including: (a) location and orientation of the building to the sidewalk; (b) transparency of and direct access to the ground floor elevation from the sidewalk; (c) articulation of street-facing elevations to promote interest and sense of quality; (d) inclusion of uses and public spaces that extend interior functions to the sidewalk such as cafes and plazas; and (e) use of pedestrian-oriented signage and lighting.
- **LU 11.5 Retail Streetscapes.** Maintain and, where deficient, improve street trees, planting, furniture, signage, public art, and other amenities that promote pedestrian activity.
- **LU 15.1 Economic Vitality and Business Revenue.** Sustain a vigorous economy by supporting businesses that contribute revenue, quality services and high-paying jobs.

The September 2018 Revised Project would include 13,036 square feet of commercial development, including 9,233 square feet of retail space and 3,804 square feet of restaurant space, along South Santa Monica Boulevard. This would be consistent with the previously listed land use goals and policies for commercial use and corridor development. Upon approval of the



M-PD-5 Overlay Zone, the September 2018 Revised Project would be more aligned with these goals and policies than the Proposed Project due to its inclusion of accessible commercial uses along a commercial corridor. Nonetheless, similar to the Proposed Project, the September 2018 Revised Project would require implementation of Mitigation Measures LU-1 and LU-2 to ensure compliance with the Planned Development Permit through an Operational Measures Program (LU-1) and Construction Management Program (LU-2).

f. Noise and Vibration. Maximum daily noise levels associated with construction of the September 2018 Revised Project would be similar to those of the Proposed Project; however, the overall duration of construction would be 26 months instead of 21 months under the Proposed Project. Although construction of the September 2018 Revised Project would generate additional truck haul trips for increased soil transport, these trips would be spread out over a longer construction schedule and would not significantly contribute to daily roadway noise throughout the construction period. Nonetheless, construction activity for either the September 2018 Revised Project or the Proposed Project would be limited to daytime hours per BHMC Section 5-1-205, which would avoid generation of high noise or vibration levels when residents are most sensitive to noise. Therefore, although construction and vibration impacts would incrementally increase under the September 2018 Revised Project, they would remain less than significant.

In the long term, exposure of future on-site residents to noise would be the same as under the Proposed Project. However, the addition of commercial space to the Project site under the September 2018 Revised Project would result in an increase in traffic generated in the vicinity of the project site. Fehr & Peers prepared a *Trip Generation for 4-Story Revised Project memorandum* for the September 2018 Revised Project in August 2018 (included as Attachment A). As shown in Table 2, the September 2018 Revised Project would generate an estimated 1,034 ADT, including 63 AM peak hour trips and 88 PM peak hour trips. This is 854 more ADT, 48 more AM peak hour trips, and 70 more PM peak hour trips when compared to the Proposed Project. In addition, due to the removal of the fifth floor, the September 2018 Revised Project would generate an estimated 24 fewer ADT, two fewer AM peak hour trips, and one fewer PM peak hour trip when compared to the July 2018 Revised Project.

**Table 2
 Trip Generation Comparison**

	Proposed Project	July 2018 Revised Project	September 2018 Revised Project	Difference in ADT	
				September 2018 Revised Project vs. Proposed Project	September 2018 Revised Project vs. July 2018 Revised Project
Average Daily Traffic (ADT)	180	1,058	1,034	+854	-24
A.M. Peak Hour Trips	15	65	63	+48	-2
P.M. Peak Hour Trips	18	89	88	+70	-1

Source: Fehr & Peers, August 2016 (see Appendix 5); Fehr & Peers, October 2017 (see Appendix 8); Fehr & Peers, July 2018; Fehr & Peers, August 2018 (see Attachment A)



According to sound measurement levels reported in Section 4.6, *Noise*, existing noise levels along Charleville Boulevard and Durant Drive were measured at 70 dBA Leq and 63.6 dBA Leq, respectively. Impacts to existing off-site development in the Project site vicinity would be significant if Project-related traffic or operational noise sources would cause a noise increase equal to or exceeding the levels shown in Table 4.6.4 in Section 4.6, *Noise and Vibration*, at a noise-sensitive receptor. These thresholds reflect Policy N 1.5 of the current Noise Element of the Beverly Hills General Plan, which was adopted in 2010. Per the noise thresholds shown in Table 4.6-4 in Section 4.6, *Noise and Vibration*, the September 2018 Revised Project would cause a noise impact on noise-sensitive receptors if roadway noise levels along Charleville Boulevard and Durant Drive increase by 1 dBA or greater.

Fehr & Peers prepared a *Revised Transportation Assessment of 9908 South Santa Monica Boulevard* for the July 2018 Revised Project in July 2018 (included as Attachment C of Appendix 9). Based on traffic volumes reported in the *Revised Transportation Assessment*, noise levels under existing and future year (2020) conditions (with and without Project-generated traffic) were calculated using the HUD DNL Calculator for study roadway segments (see Attachment D of Appendix 9). As shown in Table 11 and Table 12 of Appendix 9, traffic generated by operation of the July 2018 Revised Project would not cause an increase in traffic noise in exceedance of applicable thresholds under both existing and future year conditions. Because the September 2018 Revised Project would result in fewer ADT and peak hour trips when compared to the July 2018 Revised Project, the September 2018 Revised Project would also not result in significant traffic noise at the study intersections under both existing and future year conditions.

g. Transportation and Traffic. Fehr & Peers prepared a *Trip Generation for 4-Story Revised Project Memorandum* for the September 2018 Revised Project in August 2018 (included as Attachment A). As shown in Table 2, the September 2018 Revised Project would generate an estimated 1,034 ADT, including 63 AM peak hour trips and 88 PM peak hour trips. This is 854 more ADT, 48 more AM peak hour trips, and 70 more PM peak hour trips when compared to the Proposed Project. In addition, due to the decrease in residential floor, the September 2018 Revised Project would generate an estimated 24 fewer ADT, two fewer AM peak hour trips, and one fewer PM peak hour trip when compared to the July 2018 Revised Project.

Similar to the July 2018 Revised Project, site access under the 2018 Revised Project would be provided via a driveway along South Santa Monica Boulevard for the retail parking area with one inbound and one outbound direction of travel, and a motor court along Charleville Boulevard for the residences with an entrance point at its northern end and an exit on its southern end that exits onto the alley. Nonetheless, according to the *Revised Transportation Assessment*, the majority of September 2018 Revised Project-generated trips would also travel to and from the Project Site using South Santa Monica Boulevard with residential trips utilizing the Project driveway on Charleville Boulevard. Furthermore, similar to the Proposed Project and July 2018 Revised Project, the September 2018 Revised Project would also comply with Mitigation Measure TRAF-1⁴, which would require review of the Project design to ensure that all features are adequately designed to not obstruct driver and pedestrian visibility.

⁴ Due to physical changes to the original Proposed Project, Mitigation Measure TRAF-1 (Review of Project Features) in the FEIR has been revised accordingly: Prior to constructing the water feature or other project features (such as walls or landscaping) adjacent to the project driveways, the City Traffic Engineer shall review the proposed design to ensure that all features are adequately designed of an adequate distance from project driveways to not obstruct driver and pedestrian visibility the site distance for vehicles exiting the Project site meets the applicable site distance standards.



Fehr & Peers prepared a *Revised Transportation Assessment of 9908 South Santa Monica Boulevard* for the July 2018 Revised Project in July 2018 (included as Attachment C of Appendix 9). The *Revised Transportation Assessment* analyzes the potential July 2018 Revised Project-generated traffic impacts on the local street system under both existing and future year (2020) conditions for chosen study intersections and street segments.

As shown in Table 14 and Table 15 of Appendix 9, after applying the City's significant impact criteria, the July 2018 Revised Project would not result in a significant change of LOS at the study intersections under existing plus July 2018 Revised Project conditions or future year plus July 2018 Revised Project conditions. Because the September 2018 Revised Project would result in fewer ADT and peak hour trips when compared to the July 2018 Revised Project, the September 2018 Revised Project would also not result in significant changes of LOS at the study intersections under both existing and future year conditions.

As shown in Table 16 and Table 17 of Appendix 9, the July 2018 Revised Project would also not result in significant impacts on any study street segments based on City criteria under both existing and future year conditions. Because the September 2018 Revised Project would result in fewer ADT and peak hour trips when compared to the July 2018 Revised Project, the September 2018 Revised Project would also not result in significant impacts at the study street segments under both existing and future year conditions.

The September 2018 Revised Project would result in incrementally greater impacts to study intersections and roadway segments than the Proposed Project due to the increase in ADT and peak hour trips. However, similar to the Proposed Project and July 2018 Revised Project, the September 2018 Revised Project would not result in significant impacts and no mitigation is required. As with the Proposed Project, the September 2018 Revised Project would not generate traffic exceeding CMP significance thresholds since it would not add 50 or more peak hour trips to the nearest arterial monitoring station located at North Santa Monica Boulevard and Wilshire Boulevard. Impacts related to site access and alternative transportation modes would be similar to those of the Proposed Project, and the September 2018 Revised Project would also require compliance with Mitigation Measures TRAF-1 through TRAF-5 to ensure the review of project features by a City Traffic Engineer (TRAF-1); review of driveways plans for safety measures (TRAF-2); and implementation of a Construction Traffic Management Plan (TRAF-3), Construction Workers Parking Plan (TRAF-4), and a Cumulative Construction Management Plan (TRAF-5).

Alternatives Analysis

Section 6, *Alternatives*, of the FEIR examines a total of four alternatives to the originally Proposed Project that would avoid or substantially lessen any of the potentially significant impacts identified in the FEIR. The September 2018 Revised Project was created to provide a project, similar to Alternative 2 in Section 6, *Alternatives*, that would better align with the existing General Plan and zoning designations of the site and surrounding area as a mixed use commercial and residential project, as well as meet most of the basic Project objectives. Table 3 shows a comparison of environmental impacts of the September 2018 Revised Project in conjunction with Alternatives 1 through 4 when compared to the Proposed Project. Overall, implementation of the September 2018 Revised Project would result in slightly less impacts than Alternative 2 related to aesthetics and land use and planning. Furthermore, the September 2018



Revised Project would result in similar impacts as Alternative 3 and Alternative 4. However, similar to the originally Proposed Project, the September 2018 Revised Project would not generate any significant and unavoidable environmental impacts.

**Table 3
 Comparison of Environmental Impacts of the September 2018 Revised Project and Alternatives**

Issue	September 2018 Revised Project	No Project/ Development (Alternative 1)	Mixed Use Commercial and Residential (Alternative 2)	Mixed Use Office and Commercial (Alternative 3)	Office (Alternative 4)
Aesthetics	-	-	=	-	-
Air Quality	+	-	+	+	+
Greenhouse Gas Emissions	+	-	+	+	+
Hazards and Hazardous Materials	=	-	=	=	=
Land Use and Planning	-	-	=	-	-
Noise and Vibration	+	-	+	+	+
Transportation and Traffic	+	-	+	+	+

+ Impacts greater than those of the Proposed Project

- Impacts less than those of the Proposed Project

= Impacts similar to the Proposed Project

Note: Although impacts are identified as greater than or less than those of the Proposed Project, the overall magnitude of impacts (significant versus less than significant) is the same for all alternatives for each of the studied issues with the possible exception of transportation/traffic impacts associated with the Office alternative, which could be significant.

Conclusion

Table 3 and Table 4 are comparisons of the environmental impacts of the September 2018 Revised Project when compared to the Proposed Project and November 2017 Proposal. Overall, implementation of the September 2018 Revised Project would result in slightly less impacts than those of the Proposed Project related to aesthetics, and land use and planning; similar impacts to those of the Proposed Project related to hazards and hazardous materials; and slightly greater impacts than those of the Proposed Project related to air quality, greenhouse gases, noise, and transportation and traffic. However, similar to the originally Proposed Project, the September 2018 Revised Project would not generate any significant and unavoidable environmental impacts. The September 2018 Revised Project would also be subject to the same mitigation measures as the originally Proposed Project, which includes Mitigation Measures LU-1, LU-2, and TRAF-1 through TRAF-5 and would reduce all impacts to below a level of significance.



**Table 3
 Comparison of Environmental Impacts of the
 Proposed Project and September 2018 Revised Project**

Issue	September 2018 Revised Project
Aesthetics	-
Air Quality	+
Greenhouse Gas Emissions	+
Hazards and Hazardous Materials	=
Land Use and Planning	-
Noise and Vibration	+
Transportation and Traffic	+

+ Impacts greater than those of the Proposed Project

- Impacts less than those of the Proposed Project

= Impacts similar to the Proposed Project

Note: Although impacts are identified as greater than or less than those of the Proposed Project, the overall magnitude of impacts (significant versus less than significant) is the same for each of the studied issues.

When compared to the July 2018 Revised Project, the September 2018 Revised Project would also involve development of a mixed-use building that would include commercial and residential land with slight differences shown in Table 1. Overall, the September 2018 Revised Project would result in slightly less impacts than those of the July 2018 Revised Project related to aesthetics, air quality, greenhouse gas emissions, noise and vibration, and transportation and traffic; and similar impacts to those of the July 2018 Revised Project related to hazards and hazardous materials and land use and planning. In addition, similar to the July 2018 Revised Project, the September 2018 Revised Project would not generate any significant and unavoidable environmental impacts. Both the July 2018 Revised Project and the September 2018 Revised Project would also be subject to the same mitigation measures as the originally Proposed Project, which include Mitigation Measures LU-1, LU-2, and TRAF-1 through TRAF-5 and would reduce all impacts to below a level of significance.

**Table 4
 Comparison of Environmental Impacts of the
 July 2018 Revised Project and September 2018 Revised Project**

Issue	September 2018 Revised Project
Aesthetics	-
Air Quality	-
Greenhouse Gas Emissions	-
Hazards and Hazardous Materials	=
Land Use and Planning	=
Noise and Vibration	-
Transportation and Traffic	-

+ Impacts greater than those of the July 2018 Revised Project

- Impacts less than those of the July 2018 Revised Project

= Impacts similar to the July 2018 Revised Project

Note: Although impacts are identified as less than or equal to those of the July 2018 Revised Project the overall magnitude of impacts (significant versus less than significant) is the same for each of the studied issues.



Recirculation Considerations

According to Section 15088.5a of the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3), a lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of a draft EIR for public review under Section 15087 but before certification. As specified in in Section 15088.5a, “significant new information” requiring circulation includes a disclosure showing that:

1. *A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
2. *A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*
3. *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.*
4. *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

The purpose of this document is to evaluate the September 2018 Revised Project and compare its impacts to those of the original Proposed Project analyzed in the FEIR. In comparison to the Proposed Project, notable changes associated with the September 2018 Revised Project include 13,036 square feet of retail/commercial space on the ground floor, the addition of a second and third subterranean garage floor, and the removal of the fifth residential floor. Excavation for the second and third subterranean garage floors would extend the construction period by approximately five months in comparison to the Proposed Project. As such, overall impacts associated with air quality, greenhouse gas emissions, noise, and traffic and transportation would be slightly greater due to the increased construction duration and implementation of commercial uses. However, similar to the Proposed Project, the September 2018 Revised Project would not result in significant impacts or new mitigation measures regarding aesthetics, air quality, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise and vibration, and transportation and traffic. Therefore, the changes associated with the September 2018 Revised Project do not require recirculation of the FEIR.



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Attachment A

Trip Generation Memorandum





MEMORANDUM

Date: August 31, 2018

To: Susanne Huerta, Rincon Consultants

From: Sarah Brandenburg, Fehr & Peers

Subject: Trip Generation for 4-Story Revised Project - 9908 South Santa Monica Boulevard

Ref: 2812

This memorandum documents the trip generation of the 4-story version of the Revised Project for 9908 South Santa Monica Boulevard in Beverly Hills. We previously completed a transportation impact analysis of the 2018 Revised Project, including a trip generation estimate and an impact analysis of nearby intersections and residential roadway segments. The trip generation of the 4-story version of the Revised Project is presented below and then compared to the previous 2018 Revised Project trip generation.

4-Story Revised Project Description

The 4-Story Revised Project would reduce the number of multi-family residential units from 27 units to 25 units. The amount of commercial space would remain the same as the 2018 Revised Project consisting of approximately 13,036 square feet on the ground floor. The commercial space allocated to retail would be slightly larger than the 2018 Revised Project at 9,345 square feet (previously 9,223 square feet), and the space allocated to restaurant uses would be slightly smaller at 3,691 square feet (previously 3,804 square feet).

The 4-Story Revised Project would still contain three levels of subterranean parking and provide 176 parking spaces for residents and visitors consisting of 137 standard spaces, 20 tandem spaces, two compact spaces, and nine ADA spaces. Access to the project site would continue to be provided by two driveways, one commercial driveway on South Santa Monica Boulevard located on the southwestern edge of the site and one residential driveway on Charleville Boulevard located between South Santa Monica Boulevard and the alley.



4-Story Revised Project Trip Generation

The trip generation was calculated using the same methodology as the 2018 Revised Project based on *Trip Generation*, 9th Edition, Institute of Transportation Engineers (ITE), 2012. Since the completion of the original traffic study, the ITE 10th Edition was released. However, the ITE 9th Edition rates were used for comparison purposes to the originally proposed project. In comparing the 9th Edition rates to the 10th Edition rates, the overall trip generation would be slightly lower if the 10th Edition rates were applied. Table 1 summarizes the results of the trip generation calculation and presents the average inbound and outbound trips for the 4-Story Revised Project. As shown, the 4-Story Revised Project would generate 1,034 daily trips including 63 trips in the AM peak hour and 88 trips in the PM peak hour.

Trip Generation Comparison

The trip generation of the 4-Story Revised Project was compared to the 2018 Revised Project. Table 2 presents the previous trip generation estimates developed for the 2018 Revised Project, and Table 3 compares the 4-Story Revised Project to the 2018 Revised Project. The 4-Story Revised Project would generate fewer trips than the 2018 Revised Project as follow:

- 24 fewer trips on a daily basis
- 2 fewer trips during the AM peak hour
- 1 fewer trip during the PM peak hour

Conclusions

This memorandum documents the trip generation of the 4-story version of the Revised Project for 9908 South Santa Monica Boulevard. The 4-Story Revised Project would generate fewer trips than the 2018 Revised Project. A transportation impact analysis of the 2018 Revised Project found that the proposed uses would not significantly impact traffic at either study intersection during peak travel hours based on the LOS analysis for the existing plus Revised Project and cumulative plus Revised Project conditions (using the Beverly Hills significance criteria). In addition, the Revised Project was not found to cause significant impacts to the adjacent neighborhood street segments. Since the 4-Story Revised Project generates fewer trips than the 2018 Revised Project, the previous findings of no transportation related impacts would remain as is.

Land Use	Size		Trip Generation Rates									Estimated Trip Generation					
			ITE Code	Daily Rate	AM Peak Hour			PM Peak Hour			Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
					Rate	In	Out	Rate	In	Out		In	Out	Total	In	Out	Total
Proposed Land Use																	
Apartment	25	dwelling units	220	6.65	0.55	29%	71%	0.67	61%	39%	166	4	10	14	10	7	17
Retail	9.345	KSF	820	42.70	0.96	62%	38%	3.71	48%	52%	399	6	3	9	17	18	35
Restaurant	3.691	KSF	932	127.15	10.81	55%	45%	9.85	60%	40%	469	22	18	40	22	14	36
Total											1,034	32	31	63	49	39	88

Land Use	Size		Trip Generation Rates									Estimated Trip Generation					
			ITE Code	Daily Rate	AM Peak Hour			PM Peak Hour			Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
					Rate	In	Out	Rate	In	Out		In	Out	Total	In	Out	Total
Proposed Land Use																	
Apartment	27	dwelling units	220	6.65	0.55	29%	71%	0.67	61%	39%	180	4	11	15	11	7	18
Retail	9.233	KSF	820	42.70	0.96	62%	38%	3.71	48%	52%	394	6	3	9	16	18	34
Restaurant	3.804	KSF	932	127.15	10.81	55%	45%	9.85	60%	40%	484	23	18	41	22	15	37
Total											1,058	33	32	65	49	40	89

Land Use	Size		Trip Generation Rates									Estimated Trip Generation					
			ITE Code	Daily Rate	AM Peak Hour			PM Peak Hour			Daily Trips	AM Peak Hour Trips			PM Peak Hour Trips		
					Rate	In	Out	Rate	In	Out		In	Out	Total	In	Out	Total
Proposed Land Use																	
Apartment	-2	dwelling units	220	6.65	0.55	29%	71%	0.67	61%	39%	-14	0	-1	-1	-1	0	-1
Retail	0.112	KSF	820	42.70	0.96	62%	38%	3.71	48%	52%	5	0	0	0	1	0	1
Restaurant	-0.113	KSF	932	127.15	10.81	55%	45%	9.85	60%	40%	-15	-1	0	-1	0	-1	-1
Total											-24	-1	-1	-2	0	-1	-1