

Appendix M

Supplemental Analysis Regarding Modifications to the Cheval Blanc Beverly Hills Project



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A. Introduction

In response to comments received after publication of the Final EIR and during the Planning Commission public hearings held in February 2022, the Applicant proposed operational modifications to the Cheval Blanc Beverly Hills Project (Project). This Supplemental Analysis describes and evaluates these proposed modifications. As demonstrated by this Supplemental Analysis, the proposed modifications would not result in any significant environmental impacts and recirculation of the Draft EIR is not required. Specifically, CEQA requires recirculation of a Draft EIR only when “significant new information” is added to a Draft EIR after public notice of the availability of the Draft EIR has occurred, but before the EIR is certified (refer to California Public Resources Code (PRC) Section 21092.1 and CEQA Guidelines Section 15088.5). CEQA Guidelines Section 15088.5 specifically states:

New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted to reduce the impact to a level of insignificance.*
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant impacts of the project, but the project’s proponents decline to adopt it.*

- *The draft EIR was so fundamentally/basicly inadequate and conclusory in nature that meaningful public review and comment were precluded.*

CEQA Guidelines Section 15088.5 also provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR [...] A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.”

B. Project Description

1. Overview of Project Evaluated in Draft EIR

The Cheval Blanc Beverly Hills Project is a multiple use luxury, hotel-driven, anchor development proposed on a 55,608-square-foot (1.277-acre) site located in the Business Triangle of the City of Beverly Hills (City). The Project Site also includes a portion of the existing north-south alley located east of North Rodeo Drive and west of North Beverly Drive and subterranean encroachments into the public right-of-way for subsurface utility improvements and parking spaces.

The Project proposes the creation of the Cheval Blanc Beverly Hills Specific Plan (Specific Plan) which would facilitate the orderly and efficient development of the Project Site by, among other things, establishing appropriate size, height, and density limits. Section 2.0, Project Description, of the Final EIR includes a description of the maximum development that would be permitted by the Specific Plan by land use category as well as a specific Conceptual Plan that would fit within the envelope of the Specific Plan.¹ As discussed therein, a maximum of 220,950 square feet of floor area and a maximum of 115 hotel rooms would be permitted under the Specific Plan. As shown in Table 2.0-1 of the Section 2.0, Project Description, of the Final EIR, projected buildout to the Specific Plan maximum would include approximately 104,440 square feet associated with 115 hotel rooms; 24,772 square feet of hotel lobby and circulation areas; a 4,924-square-foot wellness center; a 12,936-square-foot spa; 20,410 square feet associated with employee facilities, office, and back of house uses, including a central kitchen; a 7,001-square-foot club conference room/screening room/lounge; and 1,197 square

¹ As described in Section 2.0, Project Description, of the Final EIR, the Specific Plan maximums include the maximum number of hotel rooms and the approximate amount of floor area that may be allocated to each use in the building should the Project be built to the Specific Plan maximums. Adjustments in floor area may occur between uses up to a 5-percent increase for any general use category as provided for in the proposed Cheval Blanc Beverly Hills Specific Plan but shall not exceed 220,950 square feet of floor area. In particular, the square footage of the Hotel Rooms, Club and Appurtenant Uses category may increase as a result of buildout of 115 hotel guest rooms as per the Specific Plan, as compared to 109 hotel guest rooms as per the conceptual plan.

feet associated with a club lobby and associated circulation areas. Projected buildout to the Specific Plan maximum would also include 24,976 square feet of retail uses and 20,334 square feet for restaurant, lounge, bar, and restaurant kitchen uses. Overall, when accounting for the existing 56,787 square feet of existing commercial uses to be removed, buildout under the Specific Plan would result in a net floor area increase of up to 164,163 square feet and a floor area ratio (FAR) of 4.2:1 (with an above ground FAR of 3.91:1).

The proposed building would vary in height from four stories and a maximum height of 51 feet along North Rodeo Drive, stepping back to a partial nine-story penthouse with a maximum height of 115 feet along North Beverly Drive. The proposed building also includes three subterranean levels, which include parking for the Project. As described in Section 2.0, Project Description, of the Final EIR, the Project would incorporate modulation of building heights and massing, articulation of building façades at all elevations, and pedestrian-friendly treatments along the public right-of-ways. The Project would also provide a variety of outdoor landscaped areas and recreational amenities onsite for hotel guests, club members, and visitors.

The Project would provide 185 vehicle parking spaces for the proposed uses in three subterranean parking levels beneath the hotel building. Primary access to the building and parking would be from South Santa Monica Boulevard from a valet motor court. The existing alley that runs north-south and is currently accessed from South Santa Monica Boulevard would be relocated to the southern portion of the Project Site and be accessible from the west side of North Beverly Drive. The location of the existing alley would be incorporated into the Project Site.

As shown in the Final EIR, the proposed valet motor court on South Santa Monica Boulevard would have been used for drop-off and pick-up for hotel guests, club members, spa, retail, and restaurant patrons. Employees, valet driven vehicles, and small delivery vans would enter the Project's subterranean parking from the relocated alley off North Beverly Drive. Employees and small delivery vans would exit the subterranean parking southbound through the existing alley. Full size delivery trucks would access the Project's surface-level loading docks via the relocated alley off North Beverly Drive and exit southbound via the existing alley. Valet driven vehicles would return from the subterranean garage to the motor court via ground level on-site internal circulation.

Construction of the Project would occur in two phases, which would overlap in their duration. Phase 1 would involve demolition of the existing structures at 449–453 and 461–465 North Beverly and construction of the relocated alley with overhead protection and associated subterranean levels. Phase 2 would include the balance of the Project. The overall duration of construction is estimated to be approximately 38 months with Project buildout in 2026. Site demolition, excavation, and export activities would occur between the hours of 7:00 P.M. and 7:30 A.M. and would require an after-hours construction permit from the City.

Construction of the subterranean parking garage would extend to a maximum depth of approximately 44 feet below ground surface. During construction of the Project, approximately 124,920 cubic yards of earth would be removed from the Project Site, including approximately 34,564 cubic yards during Phase 1 and 90,356 cubic yards during Phase 2.

2. Project Modifications

The Project includes operational modifications in response to public comments received during the Planning Commission public hearings for the Project held in February 2022 and after publication of the Final EIR. These modifications include the following:

1. Modifying the operation of the proposed 2nd floor and 7th floor restaurants that together comprise approximately 7,952 square feet of indoor dining space as well as the approximately 2,260 square feet of outdoor dining space on the 7th floor such that these areas would be appurtenant uses to the hotel and club members (i.e., the restaurant uses would be open to hotel guests, club members and their guests, but not open to the general public). However, the total restaurant floor area of 20,334 square feet previously evaluated in the Draft EIR would remain;²
2. Eliminating the area of the Day Spa on the 5th floor and reallocating this floor area to create larger hotel rooms on the 5th floor (with no increase in the number of hotel rooms and maintaining the Day Spa area on the 4th floor only);
3. Providing parking for the majority of the patrons of the retail uses off-site in City-owned parking facilities, including payment for in-lieu parking spaces. Specifically, the Project would utilize 33 total customer parking spaces off-site for the Project's retail uses via participation in the In-Lieu Parking District. Fifteen (15) parking spaces will be provided on-site to support parking for very important person-very important client (VIP-VIC) retail customers who will shop by appointment. Access for up to 24 self-park parking spaces would also be provided on-site for employees. VIP and VIC retail customers shopping by appointment and employees will self-park by accessing the down ramp at the rear of the hotel building via the relocated alley off of North Beverly Drive and will exit southbound down the alley to Brighton Avenue; they will not use the motor court.

As shown in Table 1 on page 5, with the proposed modifications, the overall maximum floor area under the Specific Plan would remain at 220,950 square feet. With the proposed

² Note that, as appurtenant uses, the indoor portions of the 2nd and 7th floor restaurants could operate 24 hours a day consistent with the hotel use (compared to from 6:00 A.M. to midnight as public uses as evaluated in the Draft EIR).

Table 1
Overview of Proposed Modifications to Floor Area

Project Uses	Proposed Conceptual Plan^a	Proposed Modifications to Conceptual Plan	Specific Plan Maximum^b	Projected Buildout to Specific Plan Maximum^c	Modified Projected Buildout to Specific Plan Maximum
Hotel Guest Rooms	98,673 sf (109 rm)	104,378 sf (109 rm)		104,400 sf (115 rm)	110,436 sf (115 rm)
Hotel Lobby and Circulation	23,413 sf	23,413 sf		24,772 sf	24,772 sf
Wellness Center	4,924 sf	4,924 sf		4,924 sf	4,924 sf
Spa	12,226 sf	6,521 sf		12,936 sf	6,899 sf
Employee Facilities/Office/BOH (includes Central Kitchen)	19,290 sf	19,290 sf		20,410 sf	20,410 sf
Hotel/Club Restaurant Not Open to Public (Appurtenant Use)	0 sf	7,952 sf			7,952 sf ^d
Club Conference Room/Screening Room/Lounge	7,001 sf	7,001 sf		7,001 sf	7,001 sf
Club Lobby and Circulation	1,197 sf	1,197 sf		1,197 sf	1,197 sf
Subtotal for Specific Plan Use Category: Hotel Rooms, Club and Appurtenant Uses	166,724 sf	174,676 sf	175,000 sf (Specific Plan allows adjustment of up to 5%: 183,750 sf)	175,640 sf	183,592 sf ^e
Subtotal for Specific Plan Use Category: Retail Uses	24,976 sf	24,976 sf	25,000 sf (Specific Plan allows adjustment of up to 5%: 26,250 sf)	24,976 sf	24,976 sf
Subtotal for Specific Plan Use Category: Restaurants/ Lounges/Bars/Restaurant Kitchen	20,334 sf	12,382 sf	12,400 sf (Specific Plan allows adjustment of up to 5%: 13,020 sf)	20,334 sf	12,382 sf ^f
Total Floor Area	212,034 sf	212,034 sf	220,950 sf (Maximum allowable overall floor area)	220,950 sf	220,950 sf
<hr/> <i>rm = rooms</i> <i>sf = square feet</i> ^a Per the Specific Plan, exterior walls; stair shafts; elevators; elevator lobbies less than 100 square feet per cab; parking spaces and access; maintenance					

Table 1 (Continued)
Overview of Proposed Modifications to Floor Area

Project Uses	Proposed Conceptual Plan ^a	Proposed Modifications to Conceptual Plan	Specific Plan Maximum ^b	Projected Buildout to Specific Plan Maximum ^c	Modified Projected Buildout to Specific Plan Maximum
<p>equipment/machinery rooms; 45,201 square feet of outdoor areas including the pool deck, pool deck outdoor dining and bar area, other outdoor dining and bar area, wellness center outdoor deck, and balconies; and 2,000 square feet of storage per below grade parking level are not included in the floor area calculations.</p> <p>^b The Specific Plan maximum is the regulatory limit, as listed on Page 5 of the Specific Plan. As such, the Specific Plan maximum sets a limit on the size of each of the three broad use categories and allows the square footage in each general use category to be adjusted by up to 5 percent as long as the overall floor area does not exceed 220,950 square feet.</p> <p>^c All floor areas listed are approximate and conceptual for CEQA analysis purposes. The Specific Plan maximums include the maximum number of hotel rooms and the approximate amount of floor area that may be allocated to each use in the building should the Project be built to the Specific Plan maximums. Adjustments in floor area may occur between uses up to a 5-percent increase for any general use category as provided for in the proposed Cheval Blanc Beverly Hills Specific Plan but shall not exceed 220,950 square feet of floor area. In particular, the square footage of the Hotel Rooms, Club and Appurtenant Uses category may increase as a result of buildout of 115 hotel guest rooms as per the Specific Plan, as compared to 109 hotel guest rooms as per the conceptual plan.</p> <p>^d This includes 2,419 square feet and 5,533 square feet of indoor restaurant space on the 2nd and 7th floors, respectively. There is also approximately 2,260 square feet of outdoor dining space on the 7th floor not counted as floor area and that is also an appurtenant use (not open to public).</p> <p>^e Reflects a 4.91-percent area increase.</p> <p>^f This area does not include the approximately 2,500 square feet pool deck outdoor dining and bar area on the 6th floor that is not counted as building floor area. The 6th floor pool deck outdoor dining and bar area would be open to public.</p> <p>Source: City of Beverly Hills; Eyestone Environmental, 2022.</p>					

modifications, the projected buildout to the Specific Plan maximum would include approximately 110,436 square feet associated with 115 hotel rooms; 24,772 square feet of hotel lobby and circulation areas; a 4,924-square-foot wellness center; a 6,899-square-foot spa; 20,410 square feet associated with employee facilities, office, and back of house uses including a central kitchen; 7,952 square feet of indoor hotel/club restaurants that would be appurtenant uses (approximately 2,260 square feet of outdoor dining space would also be provided on the 7th floor that would be an appurtenant use); a 7,001-square-foot club conference room/screening room/lounge; and 1,197 square feet associated with a club lobby and associated circulation areas. Projected buildout to the Specific Plan maximum would also include 24,976 square feet of retail uses, and 12,382 square feet of indoor restaurant, lounge, bar, and restaurant kitchen uses (approximately 2,500 square feet of pool deck outdoor dining/bar area would also be provided on the 6th floor that would be open to the public). The Specific Plan would continue to provide for a maximum FAR of 4.2:1 (with an above ground FAR of 3.91:1). The overall design of the building, including building height and massing would not change with the proposed modifications. In addition, the construction assumptions, including the depth of excavation and overall duration of construction activities would be substantially the same as that evaluated in the Draft EIR. The existing alley would also continue to be relocated to the southern portion of the Project Site and would be accessible from the west side of North Beverly Drive. The location of the existing alley would be incorporated into the Project Site.

With the proposed modifications, the number of parking spaces previously proposed on-site would be reduced from 185 spaces to 139 spaces. These spaces would continue to be provided in three subterranean parking levels beneath the hotel/retail building. In addition, the Project would utilize 33 total customer parking spaces off-site for the Project's retail uses via participation in the In-Lieu Parking District.

Primary access to the building and parking would continue to be from South Santa Monica Boulevard from a valet motor court. However, with the proposed modifications, access to the proposed valet motor court on South Santa Monica Boulevard would be modified and would be used for drop-off and pick-up for hotel guests, club members, spa, and restaurant patrons only. Access to the proposed valet motor court for patrons of the proposed retail uses would no longer be provided as the majority of the parking for retail patrons would be provided off-site. VIP and VIC retail customers shopping by appointment and all employees will self-park by accessing the down ramp at the rear of the hotel building via the relocated alley off of North Beverly Drive, will exit southbound down the alley to Brighton Avenue, and will not use the motor court. As such, with the proposed modifications, the number of cars accessing from and leaving the motor court to South Santa Monica Boulevard would be reduced.

C. Effects of Proposed Modifications

The effects of the proposed modifications are evaluated below relative to the environmental impacts of the Project as evaluated in the Draft EIR and the Final EIR. The analysis includes an evaluation of the proposed modifications for the same environmental topics provided in Section 4.0, Environmental Impact Analysis, of the Final EIR.

1. Air Quality

Revised Appendix K provides the supporting worksheets for this analysis and replaces Appendix K of the Final EIR.

a. Construction

As set forth in Section 4.1, Air Quality, of the Final EIR and supported by the detailed worksheets and modeling data provided as Appendix K of the Final EIR, local and regional air quality impacts associated with construction of the Project would be less than significant.

As discussed above, the size and general design of the Project would not change with the proposed modifications. In addition, construction activities, including the depth of excavation, construction equipment mix on peak days, and overall duration of construction activities would be substantially the same as that evaluated in the Final EIR. As such, the impact conclusions related to construction-related air quality emissions set forth in Section 4.1, Air Quality, and in Appendix K of the Final EIR would not change. Thus, construction-related localized and regional air quality impacts would continue to be less than significant.

b. Operation

An analysis of potential operational air quality impacts associated with the Project is included in Section 4.1, Air Quality, of the Final EIR and supported by the detailed worksheets and modeling data included as Appendix K of the Final EIR. As demonstrated therein, potential regional and local air quality impacts associated with the Project would be less than significant.

As discussed above, proposed modifications to the Project include reallocating a portion of the general public restaurant space to restaurant space appurtenant to the hotel and club members (i.e., the restaurant space would not be open to the general public) with no change in the total restaurant floor area, eliminating the portion of the Day Spa on the 5th floor and reallocating this space to create larger hotel rooms on the 5th floor while retaining the Day Spa on the 4th floor only, and modifications to parking and access. The operational analysis of air

pollutant emissions was updated to reflect these modifications using the most recent 2020 version of CalEEMod.³ In addition, it is noted that in response to comments provided after release of the Final EIR and during the public hearings for the Project held in February 2022 (as provided in Appendix L of the Final EIR), the trip generation of the existing onsite uses was reduced compared to the Final EIR; as such, the “credit” taken for trips generated by existing uses against the trips generated by the Project was reduced, thereby providing a more conservative analysis. Therefore, while the Project with the proposed modifications would result in fewer daily trips compared to the Project analyzed in the Final EIR, the net increase with the proposed modifications would be greater due to a reduced credit taken for existing uses. Notwithstanding, as shown in Table 2 on page 10, regional emissions associated with the proposed modifications to the Project would be substantially the same as those set forth in the Final EIR. Thus, the Project with the proposed modifications would continue to result in less than significant Project-level and cumulative regional operational air quality impacts.

With regard to localized emissions, as the overall size of the Project would not change, localized operational emissions would also continue to be less than significant.

2. Biological Resources

As indicated in Section 4.2, Biological Resources, of the Final EIR, the Project’s potential impacts related to biological resources were fully evaluated in the Initial Study prepared for the Project (included as Appendix A of the Final EIR) and such impacts were found to be less than significant. The California Department of Fish and Wildlife (CDFW), in a comment letter to the NOP, recommended further evaluation of the Project’s potential impacts to bats during construction. As such, Section 4.2, Biological Resources, was included in the EIR in response to CDFW’s comment. As discussed therein, while there is no suitable bat habitat in the existing on-site buildings, there is marginal roosting habitat for bats in the 15 street trees that would be removed as part of the Project. With implementation of Mitigation Measures BIO-MM-1 through BIO-MM-3 included in the Final EIR, the potential construction-related impact to bats and roosts would be reduced to a less than significant level.

As described above, the proposed modifications to the Project would include operational refinements to primarily reduce the number of vehicles arriving at the Project Site. The proposed modifications would not alter the design, location, or include the need for the removal of any additional landscaping or trees. As such, with the proposed modifications, the impacts to biological resources previously discussed in the Final EIR would remain and would continue to be less than significant with implementation of mitigation.

³ *It is noted that the 2016 version of CalEEMod, which was the latest version at that time, was utilized for analysis in the Draft EIR. However, in response to comments on the Draft EIR, the analysis was updated and revised CalEEMod worksheets from the 2020 version of CalEEMod were included in Appendix K of the Final EIR.*

Table 2
Comparison of Maximum Regional Project Daily Operational Emissions—At Project Buildout (2026)^a

Emission Source	Pollutant Emissions (pounds per day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Project as Evaluated in Final EIR (refer to Appendix K of Final EIR for detailed worksheets)^b						
Area	4	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	3	2	<1	<1	<1
Mobile	5	3	28	<1	4	1
Stationary	<1	<1	<1	<1	<1	<1
Total Proposed Uses Emissions	11	7	31	<1	4	1
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(44)	(48)	(519)	(150)	(146)	(54)
Exceed Threshold?	No	No	No	No	No	No
Project with Proposed Modifications^c (refer to Attachment 1 for detailed worksheets)						
Area	4	<1	<1	<1	<1	<1
Energy (Natural Gas)	<1	2	2	<1	<1	<1
Mobile	5	4	30	<1	4	1
Stationary	<1	<1	<1	<1	<1	<1
Total Proposed Uses Emissions	10	7	33	< 1	5	1
SCAQMD Significance Threshold	55	55	550	150	150	55
Over/(Under)	(45)	(48)	(517)	(150)	(145)	(54)
Exceed Threshold?	No	No	No	No	No	No
<p>Numbers may not add up exactly due to rounding.</p> <p>^a The CalEEMod model printout sheets and/or calculation worksheets for the Project with modifications are presented as an attachment to this memo. The table reflects net emissions (i.e., Project emissions less existing emissions).</p> <p>Source: Eyestone Environmental, 2022.</p>						

3. Cultural Resources

As analyzed in Section 4.3, Cultural Resources, of the Final EIR, there are no historical resources on the Project Site that would be demolished, destroyed, relocated, or altered as a result of the Project; as such, demolition of the existing on-site buildings as part of the Project would not result in a direct impact to an historical resource. As discussed above, the proposed modifications to the Project would be limited to operational refinements to the Project that would

reduce the number of vehicles arriving at the Project Site. The Project would continue to be sited within the same Project Site and the Project would continue the removal of the same existing on-site buildings as previously evaluated in the Final EIR. As such, consistent with the conclusions of the Final EIR, no direct impacts to historical resources would occur with the proposed modifications.

With regard to potential indirect impacts to historical resources, as analyzed in Section 4.3, Cultural Resources, of the Final EIR, the Project Site is located within the vicinity of the Writers and Artists Building which has been designated by the City as Landmark No. 24. The Project would not modify or alter this building, but there is the potential for vibration and settlement associated with Project construction activities to cause damage to the building. Vibration was analyzed as part of the noise analysis for the Project (refer to Section 4.8, Noise, of the Final EIR), and the estimated vibration velocity levels from all construction equipment was determined to be well below the building damage significance threshold for the Writers and Artists Building. As such, potential indirect impacts to historical resources were concluded to be less than significant. With the proposed modifications, the Project would continue to impact the same Project Site, would include the same grading and excavation activities, would include development of the same building, and would result in the same peak day construction activity, including generating the same construction vibration levels at the Writers and Artists Building. Thus, the potential indirect impacts on historical resources would continue to be less than significant with the proposed modifications to the Project.

With regard to archaeological resources, as evaluated in Section 4.3, Cultural Resources, of the Final EIR, the results of the records search indicate that no archaeological resources have been previously recorded on or within 0.5-mile of the Project Site. In addition, the Project Site is located within an urbanized area of the City and has been subject to grading and development in the past, and no archaeological resources have been previously recorded on or in the vicinity of the Project Site. Therefore, any surficial archaeological resources that may have existed at one time have likely been previously disturbed. Notwithstanding, Project excavations could potentially encounter unknown and unanticipated archaeological resources. However, with implementation of Mitigation Measure CUL-MM-1, the potential impacts on archaeological resources would be less than significant. As described above, the proposed modifications would be limited to operational refinements to the Project to primarily reduce the number of vehicles entering the Project Site. The Project would continue to be developed within the same Project Site and would include the same number of subterranean parking levels and associated grading and excavation. As such, the potential to encounter archaeological resources during construction would remain with the proposed modifications. In addition, the same mitigation would continue to be implemented. Therefore, impacts on archaeological resources would continue to be less than significant with implementation of Mitigation Measures CUL-MM-1.

4. Energy

Revised Appendix K provides the supporting worksheets for the analysis below and replaces Appendix K of the Final EIR.

a. Construction

As analyzed in Section 4.4, Energy, of the Final EIR, construction-related energy impacts were demonstrated to be less than significant. As discussed above, construction activities, including the construction equipment mix on peak days, and overall duration of construction activities would be substantially the same as that evaluated in the Final EIR. Thus, energy impacts related to construction would remain less than significant with the proposed modifications to the Project.

b. Operation

As analyzed in Section 4.4, Energy, of the Final EIR, energy impacts associated with operation of the Project were demonstrated to be less than significant. Table 3 on page 13 provides a comparison of the energy demand associated with the Project as evaluated in the Final EIR with the Project with the proposed modifications. It is noted that the energy consumption presented in Table 3 accounts for removal of existing uses. In addition to the proposed Project modifications, trip generation for existing uses was reduced compared to the Final EIR; as such, the “credit” taken for trips generated by the existing onsite uses was reduced, thereby providing a more conservative analysis. Therefore, while the Project with the proposed modifications would result in fewer daily trips compared to the Project analyzed in the Final EIR, the net increase with the proposed modifications would be greater due to a reduced credit taken for existing uses. Notwithstanding, as shown in Table 3, energy usage would be substantially the same with the proposed modifications (electricity would decrease slightly, but natural gas and transportation fuel usage would increase slightly). In addition, the Project with modifications would continue to comply with the federal Corporate Average Fuel Economy (CAFE) transportation fuel economy standards, and applicable Title 24 and CALGreen Code requirements. Therefore, with the proposed modifications, the Project would continue to result in less than significant impacts associated with use of energy and consistency with energy regulations.

5. Geology and Soils (Paleontological Resources)

As evaluated in Section 4.5, Geology and Soils (Paleontological Resources), of the Final EIR, a paleontological records search conducted for the Project Site by the Natural History Museum of Los Angeles indicates that no paleontological resources have been previously recorded on or in the immediate vicinity of the Project Site. However, the paleontological records

Table 3
Summary of Annual Energy Use During Project Operation

Source	Project Energy Demand in Final EIR ^a	Energy Demand with Modifications ^b	Percent Change
Electricity			
Building	2,392,115 kWh	2,372,136 kWh	-1%
Water ^b	120,502 kWh	115,631 kWh	-4%
Total Electricity^c	2,512,617 kWh	2,487,767 kWh	-1%
Natural Gas			
Building	9,244,038 cf	9,277,499 cf	+1%
Total Natural Gas^c	9,244,038 cf	9,277,499 cf	0%
Transportation			
Gasoline	53,433 gal	55,418 gal	+4%
Diesel	10,822 gal	11,224 gal	+4%
Total Transportation^d	64,254 gal	66,642 gal	+4%
<p><i>cf = cubic feet</i> <i>gal = gallons</i> <i>kWh = thousand kilowatt hours</i></p> <p>^a Calculations assume compliance with Project Design Feature GHG-PDF-1 provided in Section 4.6, Greenhouse Gas Emissions, of the Final EIR.</p> <p>^b Detailed calculations for the Project with the proposed modifications are provided in Attachment 1 to this Supplemental Analysis. Totals may not add up due to rounding. It is noted that as with the Draft EIR, this analysis also accounts for the 6th and 7th floor outdoor restaurant areas in the total indoor, conditioned restaurant square footage, resulting in a conservative analysis.</p> <p>^c Electricity and natural gas estimates assume compliance with applicable 2019 CALGreen requirements for Project Energy Demand with and without PDFs.</p> <p>^d Transportation fuel estimates include project characteristics entered into CalEEMod. The CalEEMod model takes into account trip and VMT reduction features such as proximity to transit, high density construction and proximity to residential or job centers.</p> <p>Source: Eyestone Environmental, 2022.</p>			

search indicates that potentially fossil-bearing soil units are present in the Project Site vicinity, either at the surface or in the subsurface, such that the possibility exists that paleontological artifacts that were not recovered during prior construction and other human activity at the Project Site may be inadvertently encountered during excavation activities for the Project. Therefore, the Project could potentially impact paleontological resources during construction. With implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3, potential impacts to paleontological resources would be reduced to less than significant. As discussed above, with the proposed modifications, the Project would impact the same Project Site area, would include the same number of subterranean levels, and would include the same area of grading and maximum depth of excavations (i.e., 44 feet below ground surface). As such, the potential to

encounter paleontological resources during construction would be the same. Thus, with the proposed modifications, impacts on paleontological resources would continue to be less than significant with implementation of Mitigation Measures GEO-MM-1 through GEO-MM-3.

6. Greenhouse Gas Emissions

Revised Appendix K provides the supporting worksheets for this analysis and replaces Appendix K of the Final EIR.

a. Construction

As set forth in Section 4.6, Greenhouse Gas Emissions, of the Final EIR and supported by the detailed worksheets and modeling data provided in Appendix K of the Final EIR, the Project's potential impacts related to Greenhouse Gas emissions would be less than significant. As discussed above, construction duration and intensity under the Project with the proposed modifications would be substantially the same as that evaluated in the Final EIR. Thus, Greenhouse Gas emissions associated with construction would be the same as that set forth in the Final EIR.

b. Operation

As discussed above, the total square footage of the Project as evaluated in the Final EIR would remain unchanged with the proposed modifications to the Project. In particular, while a portion of the general public restaurant space would be reallocated to restaurant space appurtenant to the hotel and club members (i.e., the restaurant space would not be open to the general public), the total restaurant floor area as evaluated in the Final EIR would not change. In addition, the portion of the Day Spa on the 5th floor would be eliminated and this area would be reallocated to create larger hotel rooms on the 5th floor while retaining the Day Spa area on the 4th floor. Modifications to parking and access would also occur. In addition, it is noted that in response to comments provided after release of the Final EIR and during the public hearings for the Project held in February 2022 (as provided in Appendix L of the Final EIR), the trip generation of the existing onsite uses was reduced compared to the Final EIR; as such, the "credit" taken for trips generated by existing uses against the trips generated by the Project was subsequently reduced, thereby providing a more conservative analysis. Therefore, while the Project with the proposed modifications would result in fewer daily trips compared to the Final EIR, the net increase with the proposed modifications would be greater due to a reduced credit taken for existing uses.

As shown in Table 4 on page 15, the Project with the proposed modifications would result in similar GHG emissions when compared to the Project as evaluated in the Final EIR (1,772 MMTCO₂e vs. 1,775 MMTCO₂e). In addition, with the proposed modifications, the Project

Table 4
Comparison of Annual GHG Emissions Summary (Buildout)
(metric tons of carbon dioxide equivalent [MTCO₂e])

Scope	Project as Evaluated in Final EIR^a	Project with Modifications^b
Area	0	0
Energy	919	917
Mobile ^c	589	603
Stationary	1	1
Solid Waste	64	57
Water/Wastewater	39	37
Construction	160	160
Total Emissions	1,772	1,775
<p>Numbers may not add up exactly due to rounding.</p> <p>^a Refer to Appendix K of the Final EIR for supporting calculations.</p> <p>^b Refer to Revised Appendix K for supporting calculations.</p> <p>^c With the proposed modifications, trip generation for existing uses was reduced compared to the Final EIR and provides a more conservative analysis. While the Project with the proposed modifications would result in fewer daily trips in comparison to the Project evaluated in the Final EIR, the net increase under the Project with modifications would be greater due to fewer credits taken for existing uses.</p> <p>Source: Eyestone Environmental, 2022.</p>		

would continue to comply with the goals of AB 32, SCAG's RTP/SCS, and the Beverly Hills Sustainable City Plan, and would continue to implement sustainability features, including those contained within Project Design Feature GHG-PDF-1. Therefore, with the proposed modifications, the Project would continue to be consistent with the GHG reduction goals and objectives set forth in state, regional, and local regulatory plans. Impacts related to GHG emissions would be less than significant.

7. Land Use and Planning

As provided in Section 4.7, Land Use and Planning, of the Final EIR, the Project would not conflict with the goals and policies in local (Beverly Hills General Plan and Beverly Hills Municipal Code) and regional plans (SCAG's Regional Transportation Plan/Sustainable Communities Strategy) that were adopted for the purpose of avoiding or mitigating an environmental effect. As such, Project impacts related to conflicts with applicable land use plans, policies, and regulations would be less than significant.

As indicated previously, the proposed modifications include development of the same building (including same floor area and height) on the same project site, with the same types of

uses, as evaluated in the Final EIR. As summarized above, the proposed modifications would be limited to: (1) making the proposed 2nd and 7th floor restaurants appurtenant uses; reallocating the proposed 5th floor spa space to enlarged hotel rooms (with no increase in the number of hotel rooms); and (3) providing parking for the majority of the retail use customers in existing off-site City parking structures and the payment of in-lieu parking fees, which would reduce the number of on-site parking spaces needed. However, overall, the proposed modifications would include the same type, amount, height, and development configuration (i.e., single building), overall floor area and FAR as that evaluated in the Final EIR and would require the same entitlements (with the exception of also seeking authorization for use of in lieu parking in existing off-site City parking structures along with payment of applicable fees).⁴ Hence, with the proposed modifications, the Project would not be materially different with respect to land use and planning. As such, impacts related to conflicts with applicable land use plans, policies, and regulations would continue to be less than significant.

8. Noise

Supporting worksheets for the analysis below are included in Attachment 1 of this Supplemental Analysis.

a. Construction

A detailed analysis of construction noise and vibration is provided in Section 4.8, Noise, of the Final EIR. As demonstrated therein, on-site and off-site construction-related noise and vibration impacts were demonstrated to be less than significant. As described above, the overall square footage and general design of the Project would not change as a result of the proposed modifications. Therefore, construction activities, including the construction equipment mix on peak days, construction hours, and overall duration of construction activities would be substantially the same as that evaluated in the Final EIR. With the proposed modifications, the Project would also continue to comply with the same mitigation measures, project design features and regulatory requirements set forth in the Final EIR to reduce noise levels during construction. Therefore, on-site and off-site construction noise and vibration impacts would continue to be less than significant with implementation of the Project with the proposed modifications.

⁴ As provided throughout the Final EIR, per Section 21099 (d)(1) of the Public Resources Code, a project's parking impacts shall not be considered a significant impact on the environment if 1) the project is a residential, mixed-use residential, or employment center project, and 2) the project is located on an infill site within a transit priority area, both of which conditions apply to the Project. As such, potential transportation impacts related to parking shall not be a significant environmental impact of the Project.

b. Operation

Under the Project with the proposed modifications, sources of operational noise would continue to include: (a) on-site stationary noise sources, including operation of the mechanical equipment (e.g., HVAC equipment), activities within the proposed outdoor spaces (e.g., terraces, pool decks, and outdoor amplification), and activities at the loading dock; and (b) off-site mobile (roadway traffic) noise sources.

(1) On-Site Noise Sources

As described above, the proposed modifications to the Project include reallocating a portion of the general public restaurant space to restaurant space appurtenant to the hotel and club members (i.e., the restaurant space would not be open to the general public), reallocating a portion of the Day Spa space to create larger hotel rooms, and modifications to parking and access. However, the overall square footage and types of uses within the Project Site would not change with the proposed modifications. In addition, there would be no increase in the outdoor spaces with the proposed modifications to the Project. With the proposed modifications, the Project would continue to implement Project Design Features NOI-PDF-3 through NOI-PDF-5 to ensure no significant noise impacts at off-site sensitive receptors would occur. Therefore, noise levels due to the on-site noise sources would not change relative to those set forth in the Final EIR. As such, noise impacts associated with on-site noise sources, including building mechanical equipment, outdoor spaces and loading dock area, under the Project with the proposed modifications would continue to be less than significant.

(2) Off-Site Mobile Noise Sources

Table 5 on page 18 provides a comparative summary of the roadway traffic noise impact analysis associated with the Project as evaluated in the Final EIR and the Project with the proposed modifications. As previously described above, the proposed modifications would include modifying the operation of the proposed 2nd floor and 7th floor restaurants such that these areas would be appurtenant uses to the hotel and club members (i.e., the restaurant uses would be open to hotel guests, club members and their guests, but not open to the general public); eliminating the area of the Day Spa on the 5th floor and reallocating this floor area to create larger hotel rooms on the 5th floor (with no increase in the number of hotel rooms and maintaining the Day Spa area on the 4th floor only); and providing parking for the majority of the patrons of the retail uses off-site in City-owned parking facilities. With the proposed modifications, the number of trips to and from the Project Site would be reduced while most of the trips associated with the retail uses would be redistributed to the local roadway network as most patrons of the retail uses would park off-site in City-owned parking facilities. As such, roadway traffic noise levels would decrease to and from the Project Site while traffic noise levels may increase slightly in the surrounding streets adjacent to City-owned parking facilities that may be utilized. In summary, as shown in Table 5, the Project with the proposed modifications would

Table 5
Roadway Traffic Noise Impacts—Future Plus Project Condition

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels ^a (dBA (CNEL))			Increase in Noise Levels Due to Project (dBA (CNEL))		Noise Increase Threshold, ^b dBA (CNEL)	Significant Impact?
		Future Without Project	Future Plus Project		Project in Final EIR	Project with Modifi- cations		
			Project in Final EIR	Project with Modifi- cations				
Rodeo Drive								
– Between Carmelita Ave. and N. Santa Monica Blvd.	Residential, Church	63.5	63.5	63.5	0.0	0.0	2	No
– Between S. Santa Monica Blvd. and Brighton Wy.	Commercial	67.2	67.3	67.4	0.1	0.2	-- ^b	-- ^b
– Between Brighton Wy. and Wilshire Blvd.	Commercial	66.4	66.5	66.5	0.1	0.1	-- ^b	-- ^b
Beverly Drive								
– Between Carmelita Ave. and N. Santa Monica Blvd.	Residential	66.5	66.5	66.5	0.0	0.0	1	No
– Between S. Santa Monica Blvd. and Brighton Wy.	Commercial	69.2	69.6	69.5	0.4	0.3	— ^b	-- ^b
– Between Brighton Wy. and Wilshire Blvd.	Hotel, Commercial	69.0	69.1	69.1	0.1	0.1	1	No
North Santa Monica Boulevard								
– Between Camden Dr. and Rodeo Dr.	Church	71.5	71.5	71.5	0.0	0.0	1	No
– Between Rodeo Dr. and Beverly Dr.	Park	71.5	71.5	71.5	0.0	0.0	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Park	71.6	71.6	71.6	0.0	0.0	-- ^b	-- ^b
South Santa Monica Boulevard								
– Between Camden Dr. and Rodeo Dr.	Commercial	71.8	71.8	71.8	0.0	0.0	-- ^b	-- ^b
– Between Rodeo Dr. and Beverly Dr.	Commercial	72.0	72.2	72.1	0.2	0.1	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Commercial	71.7	71.8	71.8	0.1	0.1	-- ^b	-- ^b

Table 5 (Continued)
Roadway Traffic Noise Impacts—Future Plus Project Condition

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels ^a (dBA (CNEL))			Increase in Noise Levels Due to Project (dBA (CNEL))		Noise Increase Threshold, ^b dBA (CNEL)	Significant Impact?
		Future Without Project	Future Plus Project					
			Project in Final EIR	Project with Modifi- cations	Project in Final EIR	Project with Modifi- cations		
Brighton Way								
– Between Camden Dr. and Rodeo Dr.	Commercial	65.9	66.0	66.2	0.1	0.3	-- ^b	-- ^b
– Between Rodeo Dr. and Beverly Dr.	Commercial	65.4	65.5	65.6	0.1	0.2	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Commercial	65.2	65.4	65.7	0.2	0.5	-- ^b	-- ^b
<div><div></div><div>^a Detailed calculation worksheets are included in Attachment 1 of this Supplemental Analysis.</div><div>^b Not applicable, as noise increase threshold only applicable at noise-sensitive uses, i.e., residential, hotel and daycare.</div><div>Source: AES, 2022.</div></div>								

result in a maximum increase of up to 0.5 dBA (CNEL) in traffic-related noise levels along Brighton Way (between Beverly Drive and Canon Drive) when compared with future conditions without the Project. At other analyzed roadway segments, the increase in traffic-related noise levels would be 0.3 dBA or lower. The increase in traffic noise levels would be well below the most stringent 1-dBA CNEL significance threshold (applicable when existing noise levels are greater than 65 dBA CNEL at noise sensitive receptors).

Table 6 on page 21 provides a comparative summary of the roadway traffic noise analysis associated with the Project as evaluated in the Final EIR and the Project with the proposed modifications, as compared with existing conditions. As shown in Table 6, when compared with existing traffic noise levels, the Project with the proposed modifications would result in a maximum of 0.5 dBA (CNEL) in traffic-related noise levels along Brighton Way (between Beverly Drive and Canon Drive). At other analyzed roadway segments, the increase in traffic-related noise levels would be 0.2 dBA or lower. The increase in traffic noise levels would be well below the most stringent 1-dBA CNEL significance threshold (applicable when existing noise levels are greater than 65 dBA CNEL at noise sensitive receptors).

Table 7 on page 23 provides a comparative summary of the cumulative roadway traffic noise impacts analysis associated with the Project as evaluated in the Final EIR and the Project with the proposed modifications. As shown in Table 7, the cumulative roadway traffic noise levels of the Project with the proposed modifications would result in a maximum of 0.9 dBA (CNEL) in cumulative traffic-related noise along North Santa Monica Boulevard (between Camden Drive and Canon Drive). At other analyzed roadway segments, the increase in cumulative traffic-related noise levels would be 0.8 dBA or lower. The increase in cumulative traffic noise levels would be below the most stringent 1-dBA CNEL significance threshold (applicable when existing noise levels are greater than 65 dBA CNEL at noise sensitive receptors).

In summary, noise impacts associated with off-site noise sources under the Project with the proposed modifications would generally be substantially the same as that set forth in the Final EIR. The traffic noise impacts would continue to be less than significant.

(3) Composite Noise Levels

Table 8 on page 25 presents the estimated composite noise levels under the Project with the proposed modifications, which includes all Project-related noise sources, including: traffic, mechanical equipment, loading docks, and outdoor spaces. As indicated in Table 8, the estimated composite noise levels would be similar to those set forth in the Final EIR. Therefore, the composite noise level impacts with the Project with the proposed modifications would continue to be less than significant.

Table 6
Roadway Traffic Noise Impacts—Existing Plus Project Condition

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels ^a (dBA (CNEL))			Increase in Noise Levels Due to Project (dBA (CNEL))		Noise Increase Threshold, ^b dBA (CNEL)	Significant Impact?
		Existing Without Project	Existing Plus Project		Project in Final EIR	Project with Modifications		
			Project in Final EIR	Project with Modifications				
Rodeo Drive								
– Between Carmelita Ave. and N. Santa Monica Blvd.	Residential, Church	63.1	63.2	63.2	0.1	0.1	2	No
– Between S. Santa Monica Blvd. and Brighton Wy.	Commercial	66.7	66.9	67.0	0.2	0.3	-- ^b	-- ^b
– Between Brighton Wy. and Wilshire Blvd.	Commercial	65.9	66.1	66.1	0.2	0.2	-- ^b	-- ^b
Beverly Drive								
– Between Carmelita Ave. and N. Santa Monica Blvd.	Residential	66.2	66.2	66.2	0.0	0.0	1	No
– Between S. Santa Monica Blvd. and Brighton Wy.	Commercial	69.0	69.3	69.3	0.3	0.3	— ^b	-- ^b
– Between Brighton Wy. and Wilshire Blvd.	Hotel, Commercial	68.8	68.9	68.9	0.1	0.1	1	No
North Santa Monica Boulevard								
– Between Camden Dr. and Rodeo Dr.	Church	70.6	70.6	70.6	0.0	0.0	1	No
– Between Rodeo Dr. and Beverly Dr.	Park	70.6	70.7	70.7	0.1	0.1	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Park	70.7	70.8	70.8	0.1	0.1	-- ^b	-- ^b
South Santa Monica Boulevard								
– Between Camden Dr. and Rodeo Dr.	Commercial	71.4	71.4	71.4	0.0	0.0	-- ^b	-- ^b
– Between Rodeo Dr. and Beverly Dr.	Commercial	71.6	71.8	71.8	0.2	0.2	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Commercial	71.3	71.4	71.4	0.1	0.1	-- ^b	-- ^b

Table 6 (Continued)
Roadway Traffic Noise Impacts—Existing Plus Project Condition

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels ^a (dBA (CNEL))			Increase in Noise Levels Due to Project (dBA (CNEL))		Noise Increase Threshold, ^b dBA (CNEL)	Significant Impact?
		Existing Without Project	Existing Plus Project		Project in Final EIR	Project with Modifications		
			Project in Final EIR	Project with Modifications				
Brighton Way								
– Between Camden Dr. and Rodeo Dr.	Commercial	65.6	65.7	66.0	0.1	0.4	-- ^b	-- ^b
– Between Rodeo Dr. and Beverly Dr.	Commercial	65.1	65.1	65.2	0.0	0.1	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Commercial	64.9	65.1	65.4	0.2	0.5	-- ^b	-- ^b
<div><div></div><div>^a Detailed calculation worksheets are included in Attachment 1 of this Supplemental Analysis.</div><div>^b Not applicable, as noise increase threshold only applicable at noise-sensitive uses, i.e., residential, hotel and daycare.</div><div>Source: AES, 2022.</div></div>								

Table 7
Cumulative Roadway Traffic Noise Impacts

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels ^a (dBA (CNEL))			Increase in Noise Levels due to Project (dBA (CNEL))		Noise Increase Threshold, ^b dBA (CNEL)	Significant Impact?
		Existing Without Project	Future Plus Project		Project in Final EIR	Project with Modifi- cations		
			Project in Final EIR	Project with Modifi- cations				
Rodeo Drive								
– Between Carmelita Ave. and N. Santa Monica Blvd.	Residential, Church	63.1	63.5	63.5	0.4	0.4	2	No
– Between S. Santa Monica Blvd. and Brighton Wy.	Commercial	66.7	67.3	67.4	0.6	0.7	-- ^b	-- ^b
– Between Brighton Wy. and Wilshire Blvd.	Commercial	65.9	66.5	66.5	0.6	0.6	-- ^b	-- ^b
Beverly Drive								
– Between Carmelita Ave. and N. Santa Monica Blvd.	Residential	66.2	66.5	66.5	0.3	0.3	1	No
– Between S. Santa Monica Blvd. and Brighton Wy.	Commercial	69.0	69.6	69.5	0.6	0.5	— ^b	-- ^b
– Between Brighton Wy. and Wilshire Blvd.	Hotel, Commercial	68.8	69.1	69.1	0.3	0.3	1	No
North Santa Monica Boulevard								
– Between Camden Dr. and Rodeo Dr.	Church	70.6	71.5	71.5	0.9	0.9	1	No
– Between Rodeo Dr. and Beverly Dr.	Park	70.6	71.5	71.5	0.9	0.9	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Park	70.7	71.6	71.6	0.9	0.9	-- ^b	-- ^b
South Santa Monica Boulevard								
– Between Camden Dr. and Rodeo Dr.	Commercial	71.4	71.8	71.8	0.4	0.4	-- ^b	-- ^b
– Between Rodeo Dr. and Beverly Dr.	Commercial	71.6	72.2	72.1	0.6	0.5	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Commercial	71.3	71.8	71.8	0.5	0.5	-- ^b	-- ^b

Table 7 (Continued)
Cumulative Roadway Traffic Noise Impacts

Roadway Segment	Adjacent Land Use	Calculated Traffic Noise Levels ^a (dBA (CNEL))			Increase in Noise Levels due to Project (dBA (CNEL))		Noise Increase Threshold, ^b dBA (CNEL)	Significant Impact?
		Existing Without Project	Future Plus Project					
			Project in Final EIR	Project with Modifications	Project in Final EIR	Project with Modifications		
Brighton Way								
– Between Camden Dr. and Rodeo Dr.	Commercial	65.6	66.0	66.2	0.4	0.6	-- ^b	-- ^b
– Between Rodeo Dr. and Beverly Dr.	Commercial	65.1	65.5	65.6	0.4	0.5	-- ^b	-- ^b
– Between Beverly Dr. and Canon Dr.	Commercial	64.9	65.4	65.7	0.5	0.8	-- ^b	-- ^b
<div><div></div><div>^a Detailed calculation worksheets are included in Attachment 1 of this Supplemental Analysis.</div><div>^b Not applicable, as noise increase threshold only applicable at noise-sensitive uses, i.e., residential, hotel and daycare.</div><div>Source: AES, 2022.</div></div>								

Table 8
Composite Noise Impacts—Modified Project

Receptor Location	Existing Ambient Noise Levels (dBA (CNEL))	Estimated Project Composite Noise Levels (dBA (CNEL))		Ambient + Project Noise Levels (dBA (CNEL))		Increase in Noise Levels due to Project (dBA (CNEL))		Noise Increase Threshold, (dBA (CNEL))	Significant Impact?
		Project in Final EIR	Project with Modifications	Project in Final EIR	Project with Modifications	Project in Final EIR	Project with Modifications		
R1	74.7	58.3	58.3	74.8	74.8	0.1	0.1	1	No
R4	61.6	57.0	57.0	62.9	62.9	1.3	1.3	2	No
<p>^a Composite noise levels include: traffic, mechanical equipment, loading docks and outdoor spaces.</p> <p>Source: AES, 2022.</p>									

9. Transportation

a. Construction

As evaluated in Section 4.9, Transportation, of the Final EIR, potential construction-related transportation impacts during construction of the Project associated with haul truck traffic, the delivery and staging of construction materials and equipment, construction worker traffic, and construction worker parking. However, with implementation of Mitigation Measures TRA-MM-1 through TRA-MM-3, which would include implementation of a Construction Traffic Management Plan, Construction Worker Parking Plan, and coordination with the City regarding temporary roadway closures, major deliveries, off-site staging, and loading and unloading areas, the Project would not conflict with a program, plan, ordinance or policy addressing the circulation system, and potential construction-related transportation impacts would be reduced to a less than significant level.

As described above, with the proposed modifications, the Project would include development of the same multi-use building at the Project Site, the same three levels of subterranean parking, the same amount of grading, the same excavation and export, the same construction schedule, and the same construction activity during peak construction days as that evaluated in the Final EIR. Furthermore, with the proposed modifications, construction workers would continue to utilize a mixture of public and private parking facilities in close proximity to the Project Site and eventually park in the on-site subterranean parking structure once constructed. As such, construction of the Project with the proposed modifications would result in the same amount of haul truck traffic, delivery and staging of construction materials and equipment, and construction worker traffic and associated temporary demand for parking as that set forth in the Final EIR. Therefore, with implementation of TRA-MM-1 through TRA-MM-3, construction

activities with the proposed modifications also would not conflict with a program, plan, ordinance or policy addressing the circulation system, and construction-related impacts would continue to be less than significant with implementation of mitigation.

b. Operation

As previously described, the Project would continue to be constructed within the same Project Site. As such, the plans, policies, and programs applicable to the Project disclosed in the Final EIR would continue to apply. In addition, the proposed modifications include development of the same building (including same floor area and height) with the same types of uses as evaluated in the Final EIR. As summarized above, the proposed modifications would be limited to: (1) making the proposed 2nd and 7th floor restaurants appurtenant uses; reallocating the proposed 5th floor spa space to enlarged hotel rooms (with no increase in the number of hotel rooms); and (3) providing parking for the majority of the retail use customers in existing off-site City parking structures through the payment of in-lieu parking fees, which would reduce the number of on-site parking. Overall, with the proposed modifications, the Project would not be materially different with respect to conflicts with transportation-related programs, plans, or policies. Specifically, with the proposed modifications, the Project would not conflict with the City's Goal CIR-1 and Goal CIR-2 to provide a safe and efficient roadway circulation system within the City and to provide the development of a safe, comprehensive, and integrated transit system that serves as an essential component of a multi-modal mobility system within the City as the Project would continue to provide bicycle parking spaces, including charging facilities for e-bicycles, as well as employee lockers and showers, and would be located in an area well served by a variety of public transit options, including local and regional bus lines. Therefore, with the proposed modifications, the Project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, and impacts would continue to be less than significant.

With respect to VMT, as explained in Section 4.9, Transportation, of the Final EIR, based on the OPR Technical Advisory, the City of Beverly Hills adopted four screening criteria that the City may use to identify if a proposed project is expected to cause a less-than-significant impact without conducting a detailed study: (1) project size; (2) locally serving retail; (3) project location in a low VMT area; and (4) project accessibility to transit. The screening presumption for a less than significant VMT impact finding is based on an analytical foundation that includes the CEQA Guidelines, the OPR Technical Advisory, and the City's CEQA Transportation Thresholds of Significance. The CEQA Guidelines Section 15064.3(b)(1) states, "Generally, projects within one-half mile of either an existing major transit stop or a stop along an existing high quality transit corridor should be presumed to cause a less than significant transportation impact." This presumption is based on the legislative intent of Senate Bill (SB) 743 to "[m]ore appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas

emissions.” The City reviewed both the CEQA Guidelines and OPR Technical Advisory in establishing their CEQA Transportation Thresholds of Significance.

The four screening criteria listed above were evaluated for the Project to determine if the Project has the potential to result in a VMT impact. Based on the analysis provided in Section 4.9, Transportation, of the Final EIR, the retail component of the Project meets the City’s adopted Screening Criteria 2, and the Project in its entirety meets the City’s adopted Screening Criteria 4, and therefore the Final EIR concluded that the Project would not have a VMT impact pursuant to CEQA Guidelines 15064.3, and the Project’s VMT impact would be less than significant.

As described above, with the proposed modifications, the Project would continue to be constructed within the same Project Site and would include development of the same building (including same floor area and height) with the same types of uses as evaluated in the Final EIR. In addition, the proposed modifications to modify the operation of the proposed restaurants such that the proposed 2nd and 7th floor restaurants would be appurtenant uses to the hotel and club members (i.e., the restaurant uses would be open to hotel guests, club members and their guests, but not open to the general public) and the reduction in spa area would reduce the vehicle trip generation of the Project. Furthermore, the proposed modification to provide parking for the majority of the patrons of the retail uses off-site in City-owned parking facilities, including payment for in-lieu parking spaces, would not change the VMT findings of the Project. The in-lieu program shows that six City-owned parking garages are available for retail visitors within 750 feet of the Project Site. Retail visitors are likely to utilize the parking garage that is most convenient from the origin of their trip which has the potential to slightly shorten trip lengths in comparison to all retail visitors parking on the Project Site. As such, consistent with the analysis in the Final EIR, the Project with the proposed modifications would continue to meet the City’s adopted Screening Criteria 2 and 4 and the Project’s VMT impact would continue to be less than significant.

10. Tribal Cultural Resources

As evaluated in Section 4.10, Tribal Cultural Resources, of the Final EIR, no pre-historic archaeological sites or other resources documented to be related to past Native American activity have been previously recorded within the Project Site. Furthermore, the Project Site has been previously excavated to install building foundations, and in the case of 461 North Beverly Drive, to construct one level of underground parking. Thus, native subsurface soils with the potential to support the presence of cultural deposits have been disturbed by prior demolition and development activities that historically occurred on the Project Site. As such, no known or suspected tribal cultural resources or known cultural resources have been identified that could be impacted by the Original Project. Nevertheless, based on information provided to the City during the tribal consultation process, the Project Site is located in the ancestral tribal territory of the Gabrieleño Band of Mission Indians—Kizh Nation and the tribe considers this area, including the

Project Site, to be highly sensitive to tribal cultural resources. In addition, construction of the Project would require ground disturbance and excavation to a depth of 44 feet below ground surface to accommodate three subterranean levels, which would extend below the existing maximum depth of disturbance at the Project Site associated with one subterranean level at 461 N. Beverly Drive. As such, the Project could potentially uncover undiscovered significant tribal cultural resources and could potentially result in a substantial adverse change in the significance of a tribal cultural resource listed or eligible for listing in the California Register or in a local register or a resource determined by the City to be significant pursuant to PRC Section 5024.1. However, with implementation of Mitigation Measures MM-TCR-1 through MM-TCR-5, potential impacts to tribal cultural resources would be less than significant.

As previously described above, with the proposed modifications, the Project would impact the same Project Site, would include the same number of subterranean levels, and would include the same area of grading and maximum depth of excavations (i.e., 44 feet below ground surface) as evaluated in the Final EIR. As such, the potential to encounter tribal cultural resources during construction would remain. Therefore, impacts on tribal cultural resources would continue to be less than significant with implementation of Mitigation Measures MM-TRC-1 through MM-TCR-5.

11. Utilities and Service Systems—Energy Infrastructure

As evaluated in Section 4.11, Utilities and Service Systems—Energy Infrastructure, of the Final EIR, construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, the impacts of the Project related to energy infrastructure capacity would be less than significant during construction and operation.

With the proposed modifications, the Project would include the same types of land uses (hotel, club, spa, wellness center, retail, restaurant, pool, deck, and parking), the same building configuration (single 4-9 story building with 3 levels of subterranean parking), same overall floor area, and same number of hotel guest rooms as evaluated in the Final EIR. Table 3 on page 13 provides a comparison of the energy demand associated with the Project as evaluated in the Final EIR with the Project with the proposed modifications. It is noted that the energy demand presented in Table 3 accounts for removal of existing uses. With the proposed modifications, trip generation for existing uses was reduced compared to the Final EIR; as such, the “credit” taken for trips generated by the existing onsite uses was reduced, thereby providing a more conservative analysis. Therefore, while the Project with the proposed modifications would result in fewer daily trips compared to the Final EIR, the net increase with the proposed modifications would be greater due to a reduced credit taken for existing uses. Notwithstanding, as shown in Table 3, the Project would continue to generate substantially the

same amount of energy as the Project (electricity would decrease slightly, but natural gas and transportation fuel usage would increase slightly). Furthermore, consistent with the Final EIR, the Project would not require the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, energy infrastructure impacts would continue to be less than significant with the proposed modifications.

D. Conclusions

Based on the analysis presented above, the changes to the Final EIR set forth in this Supplemental Analysis do not result in any of the conditions set forth in Section 15088.5 of the CEQA Guidelines requiring recirculation of the EIR. Specifically, the information included in this Supplemental Analysis does not disclose any new significant impacts or a substantial increase in the severity of an impact already identified in the Final EIR, nor does it contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible alternative or mitigation measure that the Applicant has declined to adopt. All of the information included in this Supplemental Analysis merely clarifies, adds to, or makes insignificant modifications to information in the Final EIR. The City has reviewed the information in this Supplemental Analysis and has determined that it does not change any of the basic findings or conclusions of the Final EIR, does not constitute “significant new information” pursuant to CEQA Guidelines Section 15088.5, and does not require recirculation of the EIR.

Attachment 1

Noise Analysis Worksheets for Proposed Modifications



Project Composite Noise Calculations (CNEL)

Project: Cheval Blanc Project - MODIFIED PROJECT

Receptor	Ambient	Traffic ^a	Mechanical	Loading	Outdoor			Project Composite	Ambient + Project	Increase
R1	74.7	53.5	40.3	25.8	56.5			58.3	74.8	0.1
R2	61.6	46.4	38.8	18.3	56.5			57.0	62.9	1.3

^a - traffic noise levels at each receptor is based on the traffic noise analysis for the roadway segment in front of the receptor.

Receptor	Roadway Segment	Traffic Noise Levels, CNEL			distance to roadway, ft	Existing	Existing + Project	barrier	distance to Center Line	adj. for distance
		Existing	Existing + Project	Project Only						
R1	Santa Monica	69.9	70.0	53.5	20	70.6	70.7	0	55	-0.7
R2	Santa Monica	62.8	62.9	46.4	290	70.6	70.7	0	55	-7.8

FHWA Off-Site Traffic Noise Calculations

Project: Cheval Blanc - MODIFIED PROJECT

Modeling Condition: Existing Conditions

Traffic Distribution as % of ADT				
Vehicle Type	Day	Eve	Night	Sub total
Auto	77.6%	9.7%	9.7%	97.0%
Medium Truck	1.6%	0.2%	0.2%	2.0%
Heavy Truck	0.8%	0.1%	0.1%	1.0%
	80.0%	10.0%	10.0%	100.0%

Peak Hour Volume (PHV) to Average Daily Traffic (ADT):	10%
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Model Input											Model Results
Roadway Segment	Roadway Width*, ft	Distance to Edge of Roadway, ft	Distance to Centerline, feet	Speed mph	AM Pk	PM Pk	ADT	PHV to ADT factor	Barrier Atten.	Site Adjust., dBA	24-Hour CNEL
Rodeo Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	70	20	55	35	500	544	5,220	10%	0	0	63.1
- Bet. S. Santa Monica Blvd. and Brighton Wy.	45	10	32.5	35	566	815	6,905	10%	0	0	66.7
- Bet. Brighton Wy. and Wilshire Blvd.	45	10	32.5	35	367	779	5,730	10%	0	0	65.9
Beverly Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	60	20	50	35	962	949	9,555	10%	0	0	66.2
- Bet. S. Santa Monica Blvd. and Brighton Wy.	50	10	35	35	1,238	1,238	12,380	10%	0	0	69.0
- Bet. Brighton Wy. and Wilshire Blvd.	50	10	35	35	1,208	1,167	11,875	10%	0	0	68.8
North Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	30	55	35	2,895	2,936	29,155	10%	0	0	70.6
- Bet. Rodeo Dr. and Beverly Dr.	50	30	55	35	2,932	2,939	29,355	10%	0	0	70.6
- Bet. Beverly Dr. and Canon Dr.	50	30	55	35	3,052	2,947	29,995	10%	0	0	70.7
South Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	10	35	35	2,084	2,221	21,525	10%	0	0	71.4
- Bet. Rodeo Dr. and Beverly Dr.	50	10	35	35	2,191	2,296	22,435	10%	0	0	71.6
- Bet. Beverly Dr. and Canon Dr.	50	10	35	35	2,069	2,170	21,195	10%	0	0	71.3
Brighton Way											
- Bet. Camden Dr. and Rodeo Dr.	30	10	25	25	562	379	4,705	10%	0	0	65.6
- Bet. Rodeo Dr. and Beverly Dr.	30	10	25	25	491	343	4,170	10%	0	0	65.1
- Bet. Beverly Dr. and Canon Dr.	30	10	25	25	409	402	4,055	10%	0	0	64.9

* Estimated based on Google Earth map.

** Calculated using FHWA's TNM Version 2.5 Computer Noise Model.

FHWA Off-Site Traffic Noise Calculations

Project: Cheval Blanc - MODIFIED PROJECT

Modeling Condition: Existing + Project Conditions

Traffic Distribution as % of ADT				
Vehicle Type	Day	Eve	Night	Sub total
Auto	77.6%	9.7%	9.7%	97.0%
Medium Truck	1.6%	0.2%	0.2%	2.0%
Heavy Truck	0.8%	0.1%	0.1%	1.0%
	80.0%	10.0%	10.0%	100.0%

Peak Hour Volume (PHV) to Average Daily Traffic (ADT):	10%
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Model Input											Model Results
Roadway Segment	Roadway Width*, ft	Distance to Edge of Roadway, ft	Distance to Centerline, feet	Speed mph	AM Pk	PM Pk	ADT	PHV to ADT factor	Barrier Atten.	Site Adjust., dBA	24-Hour CNEL
Rodeo Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	70	20	55	35	502	551	5,265	10%	0	0	63.2
- Bet. S. Santa Monica Blvd. and Brighton Wy.	45	10	32.5	35	592	873	7,325	10%	0	0	67.0
- Bet. Brighton Wy. and Wilshire Blvd.	45	10	32.5	35	376	801	5,885	10%	0	0	66.1
Beverly Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	60	20	50	35	969	967	9,680	10%	0	0	66.2
- Bet. S. Santa Monica Blvd. and Brighton Wy.	50	10	35	35	1,313	1,341	13,270	10%	0	0	69.3
- Bet. Brighton Wy. and Wilshire Blvd.	50	10	35	35	1,223	1,208	12,155	10%	0	0	68.9
North Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	30	55	35	2,909	2,968	29,385	10%	0	0	70.6
- Bet. Rodeo Dr. and Beverly Dr.	50	30	55	35	2,956	2,985	29,705	10%	0	0	70.7
- Bet. Beverly Dr. and Canon Dr.	50	30	55	35	3,069	2,988	30,285	10%	0	0	70.8
South Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	10	35	35	2,094	2,249	21,715	10%	0	0	71.4
- Bet. Rodeo Dr. and Beverly Dr.	50	10	35	35	2,253	2,439	23,460	10%	0	0	71.8
- Bet. Beverly Dr. and Canon Dr.	50	10	35	35	2,091	2,222	21,565	10%	0	0	71.4
Brighton Way											
- Bet. Camden Dr. and Rodeo Dr.	30	10	25	25	588	437	5,125	10%	0	0	66.0
- Bet. Rodeo Dr. and Beverly Dr.	30	10	25	25	500	366	4,330	10%	0	0	65.2
- Bet. Beverly Dr. and Canon Dr.	30	10	25	25	440	466	4,530	10%	0	0	65.4

* Estimated based on Google Earth map.

** Calculated using FHWA's TNM Version 2.5 Computer Noise Model.

FHWA Off-Site Traffic Noise Calculations

Project: Cheval Blanc - MODIFIED PROJECT

Modeling Condition: Future No Project Conditions

Traffic Distribution as % of ADT				
Vehicle Type	Day	Eve	Night	Sub total
Auto	77.6%	9.7%	9.7%	97.0%
Medium Truck	1.6%	0.2%	0.2%	2.0%
Heavy Truck	0.8%	0.1%	0.1%	1.0%
	80.0%	10.0%	10.0%	100.0%

Peak Hour Volume (PHV) to Average Daily Traffic (ADT):	10%
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Model Input											Model Results
Roadway Segment	Roadway Width*, ft	Distance to Edge of Roadway, ft	Distance to Centerline, feet	Speed mph	AM Pk	PM Pk	ADT	PHV to ADT factor	Barrier Atten.	Site Adjust., dBA	24-Hour CNEL
Rodeo Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	70	20	55	35	540	600	5,700	10%	0	0	63.5
- Bet. S. Santa Monica Blvd. and Brighton Wy.	45	10	32.5	35	645	880	7,625	10%	0	0	67.2
- Bet. Brighton Wy. and Wilshire Blvd.	45	10	32.5	35	420	850	6,350	10%	0	0	66.4
Beverly Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	60	20	50	35	1,040	1,020	10,300	10%	0	0	66.5
- Bet. S. Santa Monica Blvd. and Brighton Wy.	50	10	35	35	1,315	1,310	13,125	10%	0	0	69.2
- Bet. Brighton Wy. and Wilshire Blvd.	50	10	35	35	1,280	1,230	12,550	10%	0	0	69.0
North Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	30	55	35	3,450	3,670	35,600	10%	0	0	71.5
- Bet. Rodeo Dr. and Beverly Dr.	50	30	55	35	3,485	3,670	35,775	10%	0	0	71.5
- Bet. Beverly Dr. and Canon Dr.	50	30	55	35	3,630	3,690	36,600	10%	0	0	71.6
South Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	10	35	35	2,270	2,460	23,650	10%	0	0	71.8
- Bet. Rodeo Dr. and Beverly Dr.	50	10	35	35	2,385	2,540	24,625	10%	0	0	72.0
- Bet. Beverly Dr. and Canon Dr.	50	10	35	35	2,265	2,400	23,325	10%	0	0	71.7
Brighton Way											
- Bet. Camden Dr. and Rodeo Dr.	30	10	25	25	600	410	5,050	10%	0	0	65.9
- Bet. Rodeo Dr. and Beverly Dr.	30	10	25	25	530	375	4,525	10%	0	0	65.4
- Bet. Beverly Dr. and Canon Dr.	30	10	25	25	450	420	4,350	10%	0	0	65.2

* Estimated based on Google Earth map.

** Calculated using FHWA's TNM Version 2.5 Computer Noise Model.

FHWA Off-Site Traffic Noise Calculations

Project: Cheval Blanc - MODIFIED PROJECT

Modeling Condition: Future + Project Conditions

Traffic Distribution as % of ADT				
Vehicle Type	Day	Eve	Night	Sub total
Auto	77.6%	9.7%	9.7%	97.0%
Medium Truck	1.6%	0.2%	0.2%	2.0%
Heavy Truck	0.8%	0.1%	0.1%	1.0%
	80.0%	10.0%	10.0%	100.0%

Peak Hour Volume (PHV) to Average Daily Traffic (ADT):	10%
--------------------------------------------------------	-----

Model Input											Model Results
Roadway Segment	Roadway Width*, ft	Distance to Edge of Roadway, ft	Distance to Centerline, feet	Speed mph	AM Pk	PM Pk	ADT	PHV to ADT factor	Barrier Atten.	Site Adjust., dBA	24-Hour CNEL
Rodeo Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	70	20	55	35	542	607	5,745	10%	0	0	63.5
- Bet. S. Santa Monica Blvd. and Brighton Wy.	45	10	32.5	35	671	938	8,045	10%	0	0	67.4
- Bet. Brighton Wy. and Wilshire Blvd.	45	10	32.5	35	429	872	6,505	10%	0	0	66.5
Beverly Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	60	20	50	35	1,047	1,038	10,425	10%	0	0	66.5
- Bet. S. Santa Monica Blvd. and Brighton Wy.	50	10	35	35	1,391	1,413	14,020	10%	0	0	69.5
- Bet. Brighton Wy. and Wilshire Blvd.	50	10	35	35	1,295	1,271	12,830	10%	0	0	69.1
North Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	30	55	35	3,464	3,702	35,830	10%	0	0	71.5
- Bet. Rodeo Dr. and Beverly Dr.	50	30	55	35	3,509	3,717	36,130	10%	0	0	71.5
- Bet. Beverly Dr. and Canon Dr.	50	30	55	35	3,647	3,731	36,890	10%	0	0	71.6
South Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	10	35	35	2,280	2,488	23,840	10%	0	0	71.8
- Bet. Rodeo Dr. and Beverly Dr.	50	10	35	35	2,447	2,683	25,650	10%	0	0	72.1
- Bet. Beverly Dr. and Canon Dr.	50	10	35	35	2,287	2,452	23,695	10%	0	0	71.8
Brighton Way											
- Bet. Camden Dr. and Rodeo Dr.	30	10	25	25	626	468	5,470	10%	0	0	66.2
- Bet. Rodeo Dr. and Beverly Dr.	30	10	25	25	539	399	4,690	10%	0	0	65.6
- Bet. Beverly Dr. and Canon Dr.	30	10	25	25	481	484	4,825	10%	0	0	65.7

* Estimated based on Google Earth map.

** Calculated using FHWA's TNM Version 2.5 Computer Noise Model.

FHWA Off-Site Traffic Noise Calculations

Project: Cheval Blanc - MODIFIED PROJECT

Modeling Condition: Cumulative Conditions

Traffic Distribution as % of ADT				
Vehicle Type	Day	Eve	Night	Sub total
Auto	77.6%	9.7%	9.7%	97.0%
Medium Truck	1.6%	0.2%	0.2%	2.0%
Heavy Truck	0.8%	0.1%	0.1%	1.0%
	80.0%	10.0%	10.0%	100.0%

Peak Hour Volume (PHV) to Average Daily Traffic (ADT):	10%
--------------------------------------------------------	-----

Model Input											Model Results
Roadway Segment	Roadway Width*, ft	Distance to Edge of Roadway, ft	Distance to Centerline, feet	Speed mph	AM Pk	PM Pk	ADT	PHV to ADT factor	Barrier Atten.	Site Adjust., dBA	24-Hour CNEL
Rodeo Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	70	20	55	35	542	607	5,745	10%	0	0	63.5
- Bet. S. Santa Monica Blvd. and Brighton Wy.	45	10	32.5	35	671	938	8,045	10%	0	0	67.4
- Bet. Brighton Wy. and Wilshire Blvd.	45	10	32.5	35	429	872	6,505	10%	0	0	66.5
Beverly Drive											
- Bet. Carmelita Ave. and N. Santa Monica Blvd.	60	20	50	35	1,047	1,038	10,425	10%	0	0	66.5
- Bet. S. Santa Monica Blvd. and Brighton Wy.	50	10	35	35	1,391	1,413	14,020	10%	0	0	69.5
- Bet. Brighton Wy. and Wilshire Blvd.	50	10	35	35	1,295	1,271	12,830	10%	0	0	69.1
North Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	30	55	35	3,464	3,702	35,830	10%	0	0	71.5
- Bet. Rodeo Dr. and Beverly Dr.	50	30	55	35	3,509	3,717	36,130	10%	0	0	71.5
- Bet. Beverly Dr. and Canon Dr.	50	30	55	35	3,647	3,731	36,890	10%	0	0	71.6
South Santa Monica Boulevard											
- Bet. Camden Dr. and Rodeo Dr.	50	10	35	35	2,280	2,488	23,840	10%	0	0	71.8
- Bet. Rodeo Dr. and Beverly Dr.	50	10	35	35	2,447	2,683	25,650	10%	0	0	72.1
- Bet. Beverly Dr. and Canon Dr.	50	10	35	35	2,287	2,452	23,695	10%	0	0	71.8
Brighton Way											
- Bet. Camden Dr. and Rodeo Dr.	30	10	25	25	626	468	5,470	10%	0	0	66.2
- Bet. Rodeo Dr. and Beverly Dr.	30	10	25	25	539	399	4,690	10%	0	0	65.6
- Bet. Beverly Dr. and Canon Dr.	30	10	25	25	481	484	4,825	10%	0	0	65.7

* Estimated based on Google Earth map.

** Calculated using FHWA's TNM Version 2.5 Computer Noise Model.